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# Code of Conduct

Principles of behaviour for Swissgrid employees  
(July 2023 version)

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## Preamble

As the Swiss transmission system operator, Swissgrid ensures the secure, high-performance and efficient operation of the grid. Swissgrid and its employees always act responsibly, professionally and with integrity to provide a secure and sustainable supply of electricity, both now and in the future.

This Code of Conduct describes the principles and values that Swissgrid and its employees apply to their actions.

The Code of Conduct applies to all employees (including leased personnel) and to all members of the Board of Directors (collectively the «Employees»). This requires all Employees to be aware of their responsibility for these principles and values set out in this Code of Conduct and to live up to this responsibility by consistently complying with it.

The principles and values set out in this Code of Conduct serve as the basis for all of Swissgrid's business activities and, in particular, should help create a positive and motivational working environment and assist in the realisation of corporate and social responsibility.

A code of conduct cannot cover every conceivable situation. Consequently, as part of this Code of Conduct, Swissgrid expects all Employees to apply ethical common sense and to ask for help or guidance on any questions about a specific behavior by consulting with their superiors or the Compliance Officer.

Employees are informed about the Code of Conduct and the requirements relevant to their professional activities (laws, ordinances and standards, as well as internal requirements such as regulations and directives) by means of appropriate training and communication measures.

## 1 Ethical principles

We disapprove any violation of personal integrity in the workplace and treat all people with respect. We make no distinction on the basis of gender, sexual identity and orientation, origin, language or religion, age, physical, mental or psychological impairment or other personal characteristics. We are committed to fairness, professionalism and transparency.

These principles govern our conduct towards our work colleagues as well as towards business partners, authorities and the general public.

## **2 Compliance with requirements**

All applicable requirements must be complied with by all Employees, be it laws, ordinances, standards or internal requirements such as regulations and directives. Employees must familiarise themselves with the requirements that are relevant to their professional activities. They are provided with adequate support to do so by Swissgrid.

## **3 Conflicts of interest**

Employees' personal, familial or other ties can cause conflicts of interest and be contrary to the interests of Swissgrid and its business partners. Employees avoid situations that could lead to conflicts of interest.

However, it is not always possible to prevent conflicts of interest or the appearance of such a conflict. In such cases, it is mandatory for Employees to immediately inform their direct superior or the Compliance Officer and request a joint meeting to attempt to find a mutually acceptable solution.

The exercise of public offices and activities performed for remuneration must be disclosed prior to employment or acceptance, and require approval by the Executive Board or, in the case of members of the Executive Board, by the Board of Directors.

## **4 Confidentiality of company information**

Secret, confidential or internal information, including business and official secrets, are not intended for third parties (including friends and family) and must be handled with care. Cases of misconduct will result in legal consequences.

This secret, confidential or internal information includes, in particular, all business and personal data, as well as data relating to business partners, strategies, forthcoming business transactions, price calculations, offers or forthcoming personnel changes in key functions of the company.

This information must be protected against unauthorised access by implementing appropriate technical and organisational measures. Employees use information and IT resources responsibly. They must ensure its secure and correct use.

## **5 Information made available internally and externally**

Swissgrid informs its Employees, business partners, authorities and the public in a transparent manner and in due time about important and relevant events relating to its business activities, to the extent permitted by law.

When dealing with relevant authorities and business partners Swissgrid Employees must comport themselves in a cooperative, open and respectful manner.

## **6 Professional and financial integrity**

Employees protect company assets from loss, damage, misuse, theft, fraud and the like. They only use them for non-business purposes in a reasonable manner and within the legally permissible scope.

## **7 Bribery and corruption**

Swissgrid does not tolerate bribery or any other form of corrupt business behavior. Bribery attempts must be reported immediately to the Compliance Officer.

The acceptance and giving of gifts and invitations of small value customary in business transactions is permissible. Further requirements are defined and specified by means of directives based on proven principles and criteria («best practice»). In particular, no gifts or invitations may be accepted before or during decisions. Benefits of monetary value (such as cash, vouchers or discounts), regardless of their amount, may neither be accepted nor given by Employees at their own expense. If there is any doubt about the appropriateness of gifts and invitations, Employees should contact their direct superior, the Compliance Officer or a member of the Executive Board.

## **8 Occupational health and safety**

Healthy, productive, and motivated Employees are essential to a company's long-term success. The safety and protection of people and the environment are a priority for Swissgrid.

Swissgrid designs its workplaces to comply with recognised health and safety requirements. Attention must be paid in particular to the prevention of health problems arising in the workplace. This also requires Swissgrid to provide all Employees with continuous training and information regarding the requirements to be respected.

Safety and a healthy environment at work are the shared responsibility of all Employees. Swissgrid pays attention to the safety and health of third parties who are within Swissgrid's sphere of influence.

## **9 Sustainability and social responsibility**

Swissgrid fulfils its task sustainably and with due regard for social and environmental aspects.

It aligns its actions with social sustainability, assumes social responsibility and seeks the dialogue with relevant stakeholders.

Swissgrid promotes environmental protection and the careful use of natural resources. Preserving quality of life for future generations can only be assured by complying with recognised environmental standards. Therefore Swissgrid is committed to protect the environment and to minimize carbon dioxide emissions, using energy efficiently and managing resources in a sustainable manner in order to ensure a secure and sustainable supply of electricity in the future.

## **10 Reporting and dealing with misconduct**

The principles and values set out in this Code of Conduct form an integral part of Swissgrid's business culture. Employees are responsible for ensuring that they are adhered to. In principle, violations of this Code of Conduct and the associated requirements will not be tolerated and will be considered a punishable misconduct by Swissgrid.

Swissgrid expects Employees to try to prevent and/or to report serious misconduct when they become aware of it in accordance with the applicable Whistleblowing Policy before contacting the authorities or third parties. Adverse treatment of whistleblowers is prohibited.

## 11 Entry into force

This Code of Conduct will enter into force on 1 July 2023 and replace the previous Code of Conduct of 1 January 2014.

This Code of Conduct can be modified at any time by decision of the Board of Directors.

Aarau, 19 April 2023

For the Board of Directors:

**The Chairman**

**The Secretary**

Adrian Bult

Thomas Oswald