

EirGrid Employee Code of Conduct

Version 3.0

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Background

The purpose of this Code of Conduct is to set down the general principles and standards which govern the professional activities and conduct of all employees in EirGrid.

“Employees” shall mean EirGrid permanent and temporary employees, any third parties (sub-contractors, agency workers, volunteers, interns and agents) working under direction of and/or engaged by EirGrid).

The Employee Code of Conduct forms part of the terms of employment of all employees. Employees are expected to always comply with the Code.

EirGrid employees must all operate and be seen to operate, to the very highest standards of business ethics. We shall deliver our roles in line with our ethical principles of **integrity, loyalty, confidentiality** and **fairness** underpinned by compliance with all **legal and regulatory** requirements.

The terms “EirGrid” and “EirGrid Group” includes EirGrid plc, its subsidiaries (excluding SONI Ltd) and contractual joint ventures.

| We do... | We don't... |
|--|---|
| ✓ We do conduct business with integrity, always acting in the interests of EirGrid and our stakeholders. | × We don't tolerate unethical practices within EirGrid or those organisations we work with. |
| ✓ We do encourage honest and open conversations. | × We don't tolerate any form of bribery or corruption. |
| ✓ We do treat all our stakeholders with respect and communicate with them in a transparent manner. | × We don't disclose confidential company information to third parties unless required by law, or regulation, to do so. |
| ✓ We do disclose and resolve conflicts of interest. | × We don't retain EirGrid documentation post our tenure. |
| ✓ We do protect information and records we are provided with. | × We don't seek to hide or distort relevant information. |
| ✓ We do ensure internal confidentiality to support regulatory separation or “ring-fencing”. | × We don't compete unfairly or illegally in any market we operate in. |
| ✓ We do respect and protect EirGrid's property and resources. | × We don't misuse or share inside information about EirGrid for financial or personal benefit. |
| ✓ We do understand that our obligations persist post our tenure with EirGrid. | × We don't accept or offer gifts or hospitality that could influence or be perceived as influencing business decisions. |
| ✓ We do value our people and embrace diversity. | × We don't damage the reputation of EirGrid through our own use of social media, through posting on our personal social media accounts. |
| ✓ We do conduct our activities in an environmentally responsible manner. | × We don't tolerate harassment or bullying. |
| ✓ We do respect human rights of everyone who comes into contact with EirGrid. | × We don't tolerate any form of reprisal against anyone disclosing instances of a breach. |
| ✓ We do actively encourage employees who see or hear something illegal or unethical to speak up. | |

Supporting Policies and Procedures

This Employee Code of Conduct is supported by a range of corporate policies and procedures which are referenced throughout this document as appropriate.

Regulatory Environment and Engagement

At EirGrid, we work closely with the Department of Environment, Climate and Communications (DECC) and are committed to the delivery and reporting on actions under national policy, including the Climate Action Plan.

As Transmission System Operator (TSO) and Market Operator (MO), EirGrid engages in ongoing and active consultation with the Commission for Regulation of Utilities' (CRU) and the SEM Committee respectively, on a range of matters as required by legislation and regulation.

Our Values



| We are transparent | We are collaborative | We are accountable | We are ambitious |
|--|--|---|--|
| We are open, honest and proactive in our communications | We work with our colleagues and our external partners to deliver for our stakeholders | We are confident in our capabilities and are clear on our boundaries | We stretch ourselves to accomplish our goals |
| We do... <ul style="list-style-type: none">• Have honest conversations• Act with integrity• Embrace diverse perspectives | We do... <ul style="list-style-type: none">• Listen attentively• Treat all our stakeholders with respect• Learn from our successes and our failures | We do... <ul style="list-style-type: none">• Trust our judgment to act decisively• Consistently lead by example• Respect decisions and move on | We do... <ul style="list-style-type: none">• Drive transformation• Take appropriate risk• Recognise achievements |
| We don't... <ul style="list-style-type: none">• Hide from uncomfortable topics• Withhold information or data• Pretend to have all the answers | We don't... <ul style="list-style-type: none">• Rely solely on authority to get things done• Hoard knowledge and insight• Look for scapegoats | We don't... <ul style="list-style-type: none">• Sweat the small stuff• Shirk responsibility• Blame others | We don't... <ul style="list-style-type: none">• Avoid addressing poor performance• Undermine the company's position• Fail to prioritise |
| Transparency builds Trust | Collaboration generates Success | Accountability enables Empowerment | Ambition delivers Performance |

Personal and Business Integrity

Integrity

EirGrid is committed to honesty, integrity, and transparency in all our business dealings, therefore, it is essential that all employees conduct themselves and conduct all activities to the highest possible standards.

We will be open, truthful, and honest in all our business dealings. We will keep our promises, as outlined below:

- We will ensure that our work is guided by EirGrid's commitment to fairness in all its business dealings. We value our customers and treat all customers equitably.

- Suppliers will be paid on time, in accordance with agreed purchasing and payment terms.
- The marketplaces in which we operate are highly competitive. We will not attempt to acquire trade secrets or other confidential information that belongs to a competitor through any improper means.
- Our competitors and suppliers are expected to act with the same commitment to integrity. We refuse business with firms who seek to acquire confidential information through improper means.

Find out more:

- [EirGrid's Protected Disclosures Policy](#)
- [Disclosure of Interests Policy](#)
- [Ethics in Public Office Legislation](#)

Conflicts of Interest

EirGrid recognises that a conflict of interest may arise where involvement or association with an outside activity could influence or be seen to influence how EirGrid carries out its business. We are committed to ensure that there is no conflict of interest between our work in EirGrid and any outside personal interest.

Where an employee is seeking clarity or is found to have an outside interest that impacts on any matter that is dealt with in the course of their work, that interest must be declared in writing to their relevant Head of Function. Specifically, if the individual, or any family member, have a financially beneficial interest in any company which deals with EirGrid, this interest must be formally declared. Unless directed otherwise employees will not participate in dealing with the matter concerned.

At EirGrid, we will not use information gained through working in EirGrid for any personal profit.

Corporate Governance

EirGrid engages in active and ongoing consultation with Government on policies and strategic issues as required by legislation and the Code of Practice for the Governance of State Bodies. This includes providing financial planning and performance information, including the annual budget, five-year corporate plan, biannual financial performance updates and quarterly performance updates. EirGrid also engages in active and ongoing consultation with regulatory authorities as required by legislation on a range of matters.

Fraud

EirGrid defines fraud as an intentional act of deceit to obtain or attempt to obtain an unjust/illegal advantage, for example to make a gain (financial or otherwise), to avoid an obligation or to cause loss to another party. EirGrid does not tolerate fraudulent or attempted fraudulent activity.

EirGrid is committed to creating a workplace culture that encourages the reporting of wrongdoings. EirGrid commits to investigate all fraudulent activities that are discovered or suspected and will take appropriate action against all parties involved in, or assisting with, committing fraudulent activity, including but not limited to, disciplinary processes, recovery and legal action. At EirGrid, we continually take steps to prevent and detect fraud, increase awareness of fraud amongst employees and other stakeholders, and create a culture where the reporting of suspicions of fraudulent activity is encouraged and expected.

Find out more:

- [Fraud Policy](#)

Bribery and Corruption

EirGrid takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all business dealings and relationships. This applies wherever EirGrid operates to implement and enforce systems to counter bribery and corruption. We never use or share inside information about EirGrid (or any other company) for financial or other personal benefit. We never compete unfairly or illegally in any market where we are active and never collude with competitors to fix prices, rig bids or share our customers, projects or territories.

Every employee has a duty to report any suspected or actual incident of bribery or corruption, that they become aware of at the earliest possible opportunity. All third parties (sub-contractors, agency workers, volunteers, interns and agents) working under direction of and/or engaged by EirGrid) must also ensure that they comply with the rules set out by the Anti-Bribery & Corruption Policy.

Find out more:

- [Anti-Bribery & Corruption Policy](#)

Hospitality, Gifts and Entertainment

Employees and Directors should not accept hospitality, gifts or entertainment if this means that the giver might expect preferential treatment from EirGrid in return. Equally employees and Directors should not offer gifts or hospitality to gain preferential treatment or be perceived as potentially influencing their decisions.

This does not mean that receiving gifts and hospitality are inappropriate in all circumstances. Reasonable, small, appropriate, and bona fide gifts, modest hospitality or entertainment extended to or received from third parties is generally acceptable.

Find out more:

- [Hospitality, Gifts & Entertainment Policy](#)

Assets and Information

Information Assets

EirGrid Information Assets are defined as all information systems, data, and information (in digital and in paper format), electronic and computing devices, mobile devices, software, applications, network resources and physical information processing equipment owned by EirGrid.

At EirGrid, we are committed to protecting our employees, partners, and resources from any illegal or damaging actions taken by individuals, either intentionally or through negligence. We understand that effective security requires shared responsibility and the participation of every user, therefore all employees must comply with security measures in place to protect EirGrid Information Assets from unauthorised access, disclosure, modification, destruction and/or theft.

EirGrid is required to ensure the security and prevent the abuse of its Information Assets and there can be no expectation of an absolute right to privacy arising from the use of said assets. EirGrid Information Assets will only ever be used for company related business purposes and access to EirGrid Information Assets shall be based on business requirements and shall not be an automatic entitlement. Personal information stored on EirGrid information systems must only be accessed by Users in accordance with defined business need.

Anyone who comes into contact with EirGrid’s information assets must familiarise themselves with and be aware of EirGrid’s Records & Information Management Policy and associated procedures. Additionally, all users must complete information security awareness training following the start of employment or contract and refresher training as deemed necessary by the Enterprise Security Function.

Using EirGrid Information Assets for any unlawful purpose and/or disclosure of any confidential, sensitive or personal information to any person or company, will not be tolerated and may result in disciplinary action including but not limited to, reprimand, access revocation, termination of employment, and/or legal actions.

We expect all employees to maintain security standards set by EirGrid, at any location they work from and to operate with this in mind.

Find out more:

- [Acceptable Use Policy](#)
- [Records & Information Management Policy](#)

Data Privacy

EirGrid as an organisation, collects, controls and processes Personal Data and is required under law to make sure that any Personal Data processed is obtained lawfully and transparently, that the data is for a specific purpose, is no more than is necessary, is stored securely, is accurate and up to date, and is retained for no longer than is necessary.

EirGrid is committed to protecting the rights and privacy of Data Subjects in accordance with EU and national Data Protection Laws. Our Data Privacy Framework seeks to provide clarity on how Data Privacy and Protection is governed within EirGrid and outlines the various roles and responsibilities of EirGrid and employees in relation to the collection and processing of Personal Data.

Find out more:

- [Data Privacy Framework](#)

Social Media

EirGrid is committed to effective management and communication through all channels, including social media. The Public Relations function is responsible for the creation, moderation, and use of all social media content within EirGrid. The inappropriate use of social media has the potential to damage EirGrid’s reputation as well as those of other individuals or groups.

All employees are expected behave in a respectful and responsible manner at all times. Users must not publish information on any social media site, where such information has the potential to negatively affect EirGrid or its employees or damage or be destructive or hurtful for individuals and communities. EirGrid regularly monitors social media in reference to its work and to keep abreast of general commentary in the public domain, brand presence and industry or customer perceptions.

Find out more:

- [Acceptable Use Policy](#)

Our Working Environment

Inclusion, Respect and Dignity

EirGrid recognises that a diverse and inclusive organisation will achieve the best outcomes for our business, our customers, and society, enabling us to realise our purpose, ‘to transform the power system for future generations’. EirGrid is working hard to promote diversity in recruitment to bring a broader spectrum of different abilities to our organisation and be aware of best practice guidelines. In doing so, we will grow our capability into the future and ensure we are well resourced to meet the opportunities ahead.

We are committed to fostering a culture of diversity, equality, and inclusion.

Human Rights

At EirGrid, we are committed to upholding and respecting all aspects of human rights including ensuring that slavery or human trafficking is not taking place in our business or any of our supply chains. Our commitments to human rights are embedded within groupwide policies and procedures which relate to how we do business.

Protected Disclosures/Whistleblowing

EirGrid actively promotes a culture where employees and others are encouraged to report any wrongdoing in the workplace and elsewhere relating to EirGrid’s operations. The reporting and investigation process for protected disclosures can be found in Appendix 3 of EirGrid’s Protected Disclosures Policy.

Find out more:

- [Protected Disclosures Policy](#)

Health and Safety

EirGrid is committed to achieving and maintaining the highest standards of Health, Safety and Welfare for all of its employees and for any other persons who may be affected by our activities. Employees shall take all reasonable steps to ensure that the highest priority is placed on promoting and preserving the health and safety of fellow employees, this applies in EirGrid’s office building, for work-related travel and when attending off-site visits. All employees must complete mandatory Health and Safety training and for those employees who operate in specific work environments, additional training is required. EirGrid employees are responsible and accountable for exercising personal care and attention in protecting their own safety and health and for not endangering the safety and health of others by their actions or omissions.

Find out more:

- [Accident/Incident Reporting Procedure](#)
- [Accident/Incident Reporting Form](#)

Expenses

Employees are entitled to reimbursement for work related expenses. Guidelines of acceptable expenses can be found in EirGrid’s expense policy. However, employees must be mindful of the fact that as a State company, EirGrid has responsibility for the stewardship of public funds.

Find out more:

- [Expenses Policy](#)

Wellbeing and Development

At EirGrid, we value our people, and we work hard to make sure we develop a supportive working environment. We are committed to supporting our employee's health and wellbeing. We supply our employees with a range of both internal and external resources to support their wellbeing and development in EirGrid. Employees of EirGrid can find these resources on the Wellbeing page of our internal intranet site, Buzz.

EirGrid actively promotes a supportive environment for all our people to fulfil their potential and maximise their contribution to EirGrid's success. Across all levels of the organisation, we emphasise the importance of learning and development. We have a blended approach to learning and development, with a focus on training programmes to upskill in specific areas, alongside multidisciplinary team events. This allows the tacit knowledge that exists within our experienced teams to be shared with new staff.

Respecting Each Other



Being a Responsible Business

Commitment to the environment

EirGrid's strategic objectives and operations are fully aligned with the Government's Climate Action Policy and Climate Action Plan. 'Shaping our Electricity Future' outlines a pathway to reaching the government electricity ambition of powering the electricity grid by 80% renewables by 2030.

Our Sustainability Strategy aligns our targets to the most relevant and impactful of the UN's Sustainable Development Goals (SDGs) and is guided by the three pillars of:

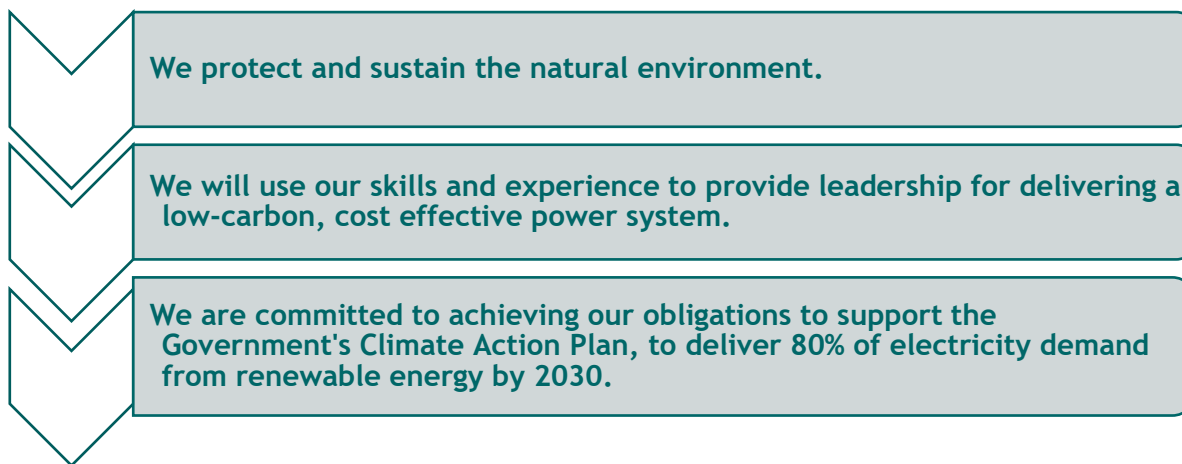
- Driving climate action and transformation of the electricity system
- Commitment to a sustainable society
- Being a responsible business

At EirGrid, our most impactful contribution from a sustainability perspective is to drive climate action through the transformation of the electricity system, realising the broader decarbonisation benefits that can materialise across the economy through electrification. This also includes minimising our own carbon footprint. For this, EirGrid undertakes a carbon footprint assessment on an annual basis. We are committed to working with all stakeholders to ensure that our business operations are conducted in a manner that supports efficient use of resources and that we manage

the environmental impact of our activities in terms of our use of products, our interactions with the land, the water, communities, and habitats. For example, to ensure merchandise purchase is in alignment to sustainable practices all merchandise purchases and printing undergo approval of the Sustainability Team.

Respect for the environment is critical to our work. At EirGrid, we are committed to monitoring and improving the scope of our biodiversity actions, in response to our obligations. When developing electricity transmission projects, we avoid or minimise impacts on biodiversity. We plan to implement proposals for Nature Inclusive Design (NID) across our projects, in collaboration with our in-house Ecologist, ESB and nature conservation bodies where appropriate.

Respecting the Environment



Commitment to a sustainable society

Engaging with the public is essential for our work. It is only with public support that we can achieve our climate action targets and secure a sustainable supply of electricity for future generations.

The development of grid infrastructure projects provides a shared benefit across the entire country. We recognise that these developments can involve change, which can bring both challenges and benefits for local communities. Our Energy Citizens Roadshows bring members of local communities together with EirGrid to engage in meaningful, in-depth, meaningful discussions about the future and the role of the grid.

Through our community benefit funds, EirGrid want to ensure that the local community which hosts our infrastructure will directly benefit. EirGrid maintains several social partnerships.

Find out more:

- **Public Engagement Strategy**
- **Shaping Our Electricity Future Roadmap**

Respecting our communities (in which we operate)



Governance Commitments

EirGrid is committed to reporting on our strategy and approach, as well as our performance in respect of our governance through the sustainability lens. We have committed to annually reporting on our performance against each of the three pillars of our sustainability strategy, including performance against our Science Based Targets. We welcome increased ambitions for climate policy development and will report under the new Corporate Sustainability Reporting Directive (CSRD) from 2026.

Since 2010, EirGrid has been accredited with the Business Working Responsibly (BWR) Mark, which is an independent external accreditation of how EirGrid interact with the marketplace, the workplace, the environment and the communities we engage with and an assessment of our sustainability strategic approach.

Non - Compliance and Sanctions

EirGrid is committed to conducting its business to the highest standards of integrity, fairness and honesty in compliance with statutory and regulatory obligations. At EirGrid, we recognise that is the responsibility of every one of us to uphold these principles, as outlined in our Code of Conduct.

Any action in breach of our Code by an employee is a disciplinary matter and will result in disciplinary procedures being invoked. This may result in penalties being imposed (up to and including dismissal).

Any action in breach of our Code by a contractor, casual or agency worker will be reported to the relevant person's employer and may result in termination of the contract between the relevant EirGrid Group entity and the relevant third-party company. In the case of either of the above, EirGrid may also take action to recover any losses incurred, which may include the issuing of civil and/or criminal proceedings against the employee or contractor and/or other individual or company concerned.

Finally, the matter will also be reported to An Garda Síochána, or other authority, where EirGrid is required (or elects) to do so.

Document Review

This policy will be reviewed at least every two years for effectiveness in its implementation and operation. This will be done in line with changes in statute law, relevant case law and other

developments. Any revisions or modifications necessary will be made and communicated to all employees as soon as is reasonably practicable in consultation and agreement with senior management.

The Head of Governance, Risk & Compliance shall ensure that:

- all employees are made aware of the Employee Code of Conduct on at least an annual basis;
- all new employees are made aware of the Employee Code of Conduct through the induction process;
- awareness or guidance is available to all employees on an ongoing basis; and
- Heads of Functions are aware of their specific responsibilities in relation to the Employee Code of Conduct.

Approved by the EirGrid plc Board 15th May 2024

Approved by CRU 10th July 2025

Appendix 1: Relevant Policies

| | | |
|---|--|--|
| Employee Code of Conduct | Directors' Code of Conduct | Protected Disclosures / Whistleblowing Policy |
| Disclosure of Interests Policy | Hospitality, Gifts & Entertainment Policy | Fraud Policy |
| Anti-Bribery & Corruption Policy | Acceptable Use Policy | Data Privacy Framework |
| Shaping our Electricity Future Roadmap | Expenses Policy | Public Engagement Strategy |