

# Employee Code of Conduct

Version 2.1

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## 1. Background

As EirGrid Group employees we 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** under-pinned by compliance with all **legal and regulatory** requirements.

## 2. Supporting Policies & Procedures

This Employee Code of Conduct is supported by a range of corporate policies and procedures which are referenced in Appendix 1. The current versions of these supporting policies and procedures are maintained on the Group's intranet site.

## 3. Application

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

Breaches of the Code will constitute a breach of the terms of employment and may result in disciplinary action being pursued in accordance with agreed procedures.

## 4. Principles

The general principles underlying this Code of Conduct, which applies to all employees of EirGrid Group, irrespective of level or location, are:

- **Integrity;**
- **Loyalty;**
- **Legal & Regulatory Compliance;**
- **Confidentiality;** and
- **Fairness.**

### 4.1 Integrity

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

- ❖ We will ensure that there is no conflict of interest between our work in EirGrid Group and any outside personal interest. A conflict of interest arises where involvement or association with an outside activity could influence or be seen to influence how EirGrid Group carries out its business.
- ❖ Where we have an outside interest that impacts on any matter that we may have to deal with in the course of our work, we will declare that interest in writing to our manager/supervisor. Specifically if we, or any family member, have a beneficial interest in any company which deals with EirGrid Group, this interest must be formally declared.
- ❖ Unless directed otherwise we will not participate in dealing with the matter concerned. We will not use information gained in the course of EirGrid Group work for any personal profit.

### 4.2 Loyalty

We acknowledge that we owe to EirGrid Group loyalty and commitment in all its business activities.

- ❖ We will not engage in, or support an outside activity or organisation which is in competition with EirGrid Group.
- ❖ In engaging in any other outside activity, we will ensure that we do not in any way impair our ability to give regular, punctual and satisfactory service to the company.

- ❖ We will support colleagues and the company in all matters related to EirGrid Group business activities.
- ❖ We will not undermine through action or omission the goals and objectives of EirGrid Group, its staff and management. Specifically all grievances and concerns will be progressed through agreed internal channels prior to any action which might affect public confidence or the good name of the company.

### 4.3 Legal & Regulatory Compliance

We will ensure that our work for EirGrid Group complies fully with the laws and regulations of the countries in which we operate.

- ❖ We will ensure that EirGrid Group complies with all regulatory requirements. In the case of any doubt about a given issue, the matter should be referred to:
  - Head of Group Legal Services (statutory);
  - Head of Group Regulation (regulatory); or
  - Head of Governance, Risk & Compliance (general).

### 4.4 Confidentiality

We will maintain confidentiality in relation to business transactions except when otherwise authorised by the parties involved, or if required by law.

- ❖ We will not disclose details of confidential company matters to third parties, including the media. Internal confidentiality (to support regulatory separation or "ring fencing") will be observed by all staff.
- ❖ We will fully honour the requirements of the General Data Protection Regulation.

### 4.5 Fairness

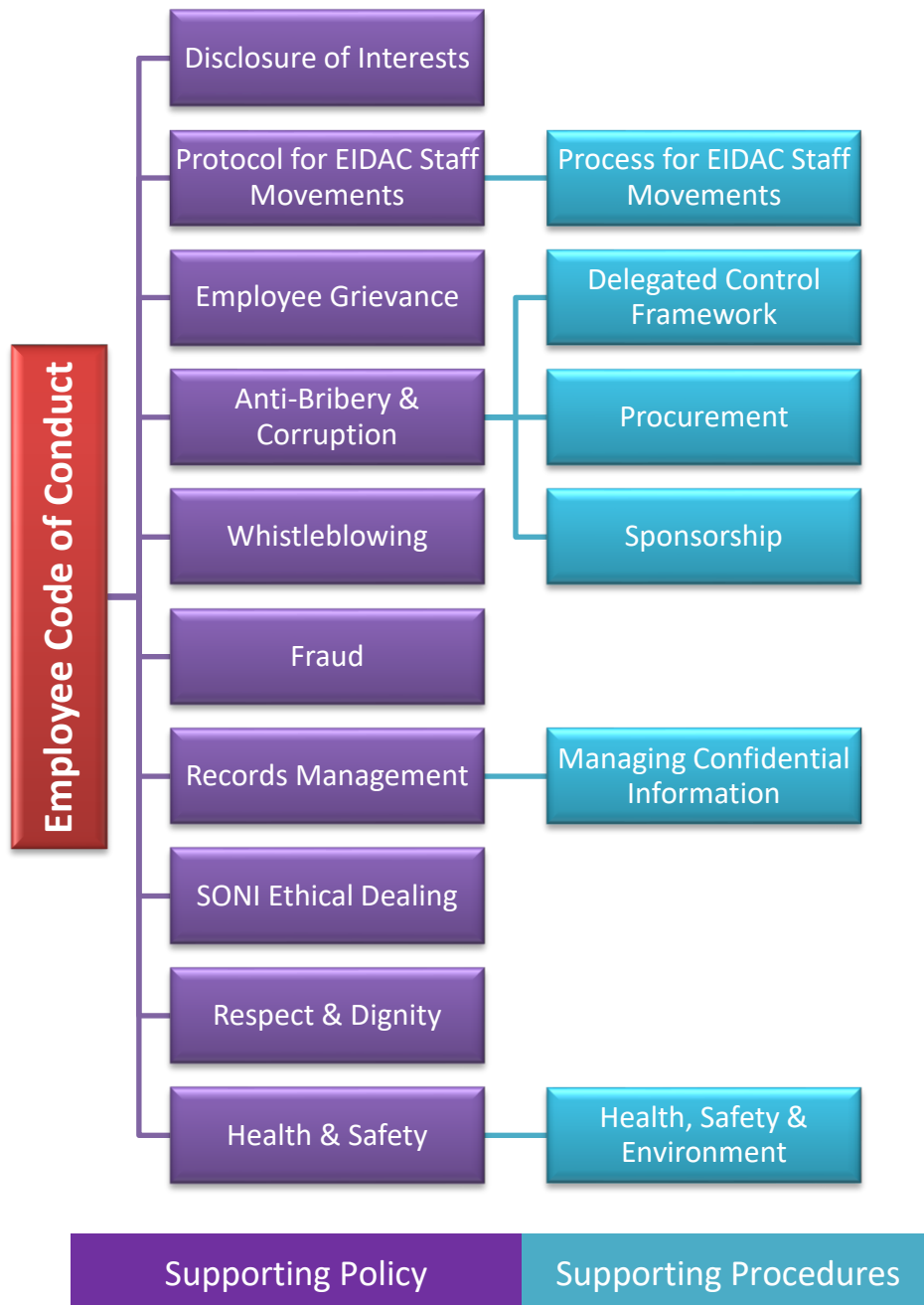
We will ensure that our work is guided by EirGrid Group's commitment to fairness in all its business dealings. We accept the need to value our customers and treat all customers equitably.

- ❖ We will not accept any money or any significant gift from a customer or supplier.
- ❖ We will not accept any gift from a customer or supplier if it could reasonably be viewed as contributing to the giving of preferential treatment to a customer or supplier.
- ❖ Suppliers will be paid on time, in accordance with agreed purchasing and payment terms.
- ❖ The marketplaces in which we operate are highly competitive. We compete vigorously and energetically, but we also compete ethically and honestly.
- ❖ We will not attempt to acquire trade secrets or other confidential information that belongs to a competitor through any improper means.
- ❖ We acknowledge that EirGrid Group places the highest priority on promoting and preserving the health and safety of its employees and the general public. As employees we will take every reasonable precaution to avoid injury to ourselves, our colleagues and members of the public.
- ❖ We will treat all our colleagues and our customers equally irrespective of marital status, sex, race, colour, creed, sexual orientation, political preferences, age or disablement. The recruitment and promotion of employees will be strictly on merit.
- ❖ We recognise the effect of EirGrid Group's activities on the communities we serve.
- ❖ We will ensure that our work for EirGrid Group always takes into account EirGrid Group's commitment to minimising the impact of its operations on the natural environment, consistent with the need to provide energy and infrastructure on a cost effective basis in order to promote Ireland and Northern Ireland's competitiveness.

## 5. Document Review

This document shall be reviewed every two (2) years.

Appendix 1 - Related Policies & Procedures<sup>1</sup>



<sup>1</sup> Hover over document then Ctrl + Click to open

## Appendix 2 – Commission for the Regulation of Utilities Approval<sup>2</sup>

RE: EirGrid Employee Code of Conduct



Rachel Strong <rstrong@cru.ie>  
To: Kicullen, Shirley  
Cc: REGULATION; Emer; Gerrard; Thompson, Bill; Lane, Karen



Thu 01/07/2021 15:01

**CAUTION:** This email originated from outside of the organisation. Do not click on links or open attachments unless you recognise the sender and know the content to be safe.

Dear Shirley,

Thank you for making the requested updates.

I can confirm approval of the EirGrid Employee Code of Conduct

Kind Regards,  
Rachel

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<sup>2</sup> S.I. No. 445/2000 - European Communities (Internal Market in Electricity) Regulations, 2000, requires the following:

*“(1) EirGrid shall prepare a code of conduct, for approval by the Commission, which shall apply to every director of EirGrid and to every person employed by EirGrid under a contract of employment.*

*(2) The code of conduct shall be consistent with these Regulations, in particular, with the requirements in relation to preserving the confidentiality of commercially sensitive information.*

*(3) The code of conduct shall be included as part of every contract of employment with EirGrid.”*