



# Human rights Statement

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## Disclaimer

This is an English translation of the Dutch human rights statement, which is available on [www.stedingroep.nl](http://www.stedingroep.nl). In the event of any discrepancy, the Dutch version will prevail.



# 1. Introduction

This document sets out Stedin Group's Human Rights Statement.

Stedin Group's mission is to work together to create an environment filled with new energy for our and future generations. We strive every day to ensure network access for all.

In doing so, Stedin Group makes every effort to safeguard the rights of individuals everywhere we work. This applies throughout our company's value chain, to our employees, our direct and indirect suppliers, our customers and other stakeholders in our value chain. We commit ourselves not to harm individuals, and we seek to avoid human rights violations. If our activities cause, contribute to or are associated with negative human rights impacts, we will determine what action to take.

Our human rights policy adheres to the guidelines and standards set out in Dutch legislation and international standards and guidelines.

## Definitions

<[See annex](#)>

# 2. Key policy considerations

We express our commitment to respecting universal human rights in the Stedin Group Human Rights Policy, and the Human Rights Statement stemming from it. The Human Rights Policy clarifies what Stedin Group stands for when it comes to the human rights of its own employees as well as employees of suppliers, customers and other stakeholders in the value chain. The human rights policy also translates universal human rights into practical policies to realise and safeguard the principles defined.

## Time periods

The policy as described in this document takes effect on 1 January 2025. The policy will be periodically reviewed and revised as necessary to stay in line with current developments and thus remain relevant and effective.

# 3. Scope of the policy

The Stedin Group Human Rights Policy covers every dimension of our activities, including, but not limited to, all locations where our employees carry out their work, all work processes and all our products and services. The purpose of this policy is to safeguard the rights of our employees, including interns and those who work for us on the basis of secondment, hiring or freelance agreements.

We also expect our suppliers to adhere to the human rights set out in the policy and will use our influence where necessary and possible to promote respect for human rights. Specific elements of the Human Rights Policy also apply to our customers and other stakeholders throughout our value chain.

## 4. Human rights

Our commitment to safeguarding human rights is based on standards arising from Dutch laws and regulations and the following international standards:

- Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- International Labour Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work;
- Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD);
- United Nations (UN) Guiding Principles on Business and Human Rights.

We comply with Dutch laws and regulations and expect our business contacts in the value chain to comply with national laws and regulations in the country in which they are established. Where there are differences between national legislation and international standards, we strive to adhere to the most far-reaching guideline and encourage our business contacts in the value chain to do the same. The Stedin Group Human Rights Policy focuses on three key priorities:

- Health and safety;
- Equal treatment and non-discrimination;
- Freedom and self-determination.

### 4.1. Health and safety

#### **A safe working environment**

Stedin Group offers all its employees a physically and socially safe and stimulating working environment. We are committed to the 'ILO Occupational Safety and Health Convention, 1981 (No. 155).'

Working safely and creating safe work conditions for employees, customers and bystanders is the highest priority for Stedin Group. We will never take any unnecessary risks when it comes to the safety of our employees, customers, business contacts, neighbours and the surrounding area. By safety, we mean not only physical safety but also social and psychological safety.

We devote extra attention to the health of employees working in jobs with an increased health risk, including by offering periodic health checks.

We expect our business contacts in the value chain to also commit to safe working and safe and healthy work conditions.

#### **Work conditions – including working hours**

Stedin Group is committed to the laws and regulations on the working hours of its employees, including regulations on working irregular hours and on-call or emergency shifts. In countries where there are no regulations on maximum working hours, we aim to respect the maximum working hours according to EU directives as much as possible. We expect our business contacts in the value chain to do the same.

### **Child labour, minimum age of employees and worst forms of child labour**

Stedin Group ensures that no children under the age of 15 are employed. For positions involving hazardous work conditions, we ensure that no children under the age of 18 are employed. We are committed to the 'ILO Minimum Age Convention, 1973 (No. 138)' and to the 'ILO Worst Forms of Child Labour Convention, 199 (No. 182)' and expect the same from our business contacts in the value chain.

We devote extra attention to ensuring the safety and well-being of any children under the age of 18 who we employ. If at any time we identify child labour in our own activities or elsewhere in our value chain, we will endeavour to ensure that the negative impact on the child or children is reversed as much as possible.

## **4.2. Equal treatment and non-discrimination**

Stedin Group wants its workforce to reflect society. This ambition is included in our ESG Strategy. We report on our targets and results in our annual report.

### **Right to equal treatment**

Stedin Group recognises that everyone has the right to equal treatment. We are committed to the 'ILO Discrimination (Employment and Occupation) Convention, 1958 (No. 111).' We expect the same from our business contacts in the value chain.

### **Fair pay and compensation**

Stedin Group is committed to offering fair pay, in keeping with a fair distribution of income. We guarantee that all Stedin Group employees receive at least the minimum wage, and we expect our business contacts in the value chain to do the same.

Stedin Group is committed to rewarding men and women equally for the same work. In this context, we are committed to the 'ILO Equal Remuneration Convention, 1951 (No. 100).' In our annual report, we set targets for the gender pay gap and the difference between the highest wage and the average wage within our own organisation.

### **No discrimination and harassment**

Stedin Group recognises that everyone has the right to an environment free from violence and harassment. We are committed to the 'ILO on Violence and Harassment Convention, 2019 (No. 190).' We expect the same from our business contacts in the value chain.

Stedin Group realises that a work environment in which violence or harassment occurs can be a violation of human rights. Violence and harassment pose a threat to equal opportunities and can affect psychological and physical health.

We therefore prohibit any discrimination or harassment of our employees, employees of suppliers, customers and other business contacts on the basis of characteristics such as race, skin colour, gender, sexual orientation, age, physical disabilities, religion, political beliefs or national, ethnic or social origin.

We aim to prevent violence and harassment towards employees, employees of suppliers, customers and other business contacts by ensuring a culture based on mutual respect and human dignity.

We have a Code of Conduct for employees and Supplier Code of Conduct that provide concrete guidance on desirable behaviour.





## 4.3. Freedom and self-determination

### **Forced labour**

Stedin Group commits not to cooperate with or benefit from forms of forced labour as referred to in the 'ILO Forced Labour Convention, 1930 (No. 29)' and the 'Abolition of Forced Labour Convention, 1957 (No. 105).'

We do not engage in practices where individuals are forced to perform work under pressure of violence, intimidation or more subtle forms of pressure. We believe it is important that all our employees feel free to work, are aware of the employment terms that apply to them and receive the corresponding remuneration on a regular and timely basis.

We expect the same from our business contacts in the value chain.

### **Right to form or join a trade union and to bargain collectively**

Stedin Group respects the right of employees to join a trade union or other form of employee association and the right to bargain collectively in accordance with local laws and regulations. We are committed to the 'ILO Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)' and the 'Right to Organise and Collective Bargaining Convention, 1949 (No. 98).'

We respect our employees' right to join a union without fear or negative reactions. We respect our employees' right to choose who they want to be represented by. We encourage an open and honest ongoing dialogue with these representatives.

We expect the same from our business contacts in the value chain.

### **Privacy**

Stedin Group is committed to protecting personal data. We ensure that the privacy of individuals is respected in accordance with national and applicable international laws and regulations, such as the General Data Protection Regulation and the Dutch General Data Protection Regulation Implementation Act. This applies both to our own employees and to customers. We have set this out in our privacy policy. We expect the same from our business contacts in the value chain.

## 5. Risk analysis

In line with the UN Guiding Principles, Stedin Group has established a due diligence process that enables us to identify, address and mitigate risks of human rights violations. To this end, we conduct risk-driven value chain research across our entire chain on topics such as human rights. We also screen suppliers for human rights issues and request suppliers to carry out similar screening of their own suppliers and/or third parties they engage and to adhere to national and international laws and regulations and the Supplier Code of Conduct. We discuss negative impacts on human rights in our supply chain and implement actions such as self-assessments or audits where necessary to prevent future issues.

## 6. Consideration of stakeholders

The Stedin Group Human Rights Policy has both an internal effect and an effect on parties in the value chain. We realise the importance of engaging with our employees, suppliers, customers and other stakeholders who may be impacted by our activities. We do this in a number of ways, including:

### Informing and committing

- **Employees** are familiarised with the Human Rights Policy as part of communication and awareness-raising activities with regard to the Stedin Code of Conduct.
- **Suppliers** are informed of their rights and obligations in relation to the Human Rights Policy through the Supplier Code of Conduct. We make our suppliers sign this code, committing themselves to our human rights principles, so that they in turn can involve their suppliers. We also expect our suppliers to inform their employees of their rights and obligations under the Stedin Group Human Rights Policy and its translation into the Supplier Code of Conduct.
- By publishing the Stedin Group Human Rights Statement on our website, we inform **customers** and all **other stakeholders** of our commitment to human rights.

This helps us ensure commitment to Human Rights throughout our organisation's value chain.

### Providing opportunities to report violations

To identify and address potential consequences of our actions in a timely manner, we enable employees, suppliers and other stakeholders to report possible misconduct to us in an accessible manner. There are a number of ways to do this, including:

- Stedin Group has an 'integrity and security' reporting facility, with the Compliance Officer investigating each report in more detail. Integrity incidents are handled in accordance with our internal 'Policy Instruction for Reporting and Handling Integrity Incidents and Misconduct'. There is also an 'Information Security' reporting facility and a privacy issues reporting facility. Employees can also discuss situations with a confidential adviser.
- Employees can report behaviour that they believe violates the internal Code of Conduct in accordance with the 'Policy Instruction on Reporting and Handling Integrity Incidents and Misconduct'. They can also report an incident of any kind through systems such as Alerta, IMS or the Dutch Whistleblowers Authority.
- Suppliers and other parties can report complaints in relation to the Public Procurement Act 2012 in accordance with the terms of reference of Stedin's Complaints Committee.
- Customers can make reports by phone or through the Stedin website. These reports are handled by the Customer Contact Centre and Complaints Management.

# Human Rights Policy Annex

## Definitions and terminology

Term	Meaning
Commit	Pledge oneself to.
Discrimination	Treating people differently, disadvantaging or excluding them based on certain personal characteristics.
Guarantee	Where the policy uses the term 'guarantee', we mean that we will ensure the policy is complied with. We are accountable for this and can be held responsible for compliance.
Forced labour	Labour or services demanded from a person under threat of punishment and for which the person has not volunteered. This includes subtle forms of forced labour, including but not limited to: confiscating identity documents, psychological coercion, linking labour to accommodation and pressure to work overtime.
Harassment	Attempting to influence a person's behaviour by deliberately discouraging, undermining, frightening, confusing, embarrassing or rendering the person unable to act.
Customers	Those living or located in Stedin's service area in the Netherlands, including both low-volume customers and heavy-volume customers.
Employees	Employees of Stedin, interns and people who work for Stedin on the basis of secondment, hiring or freelance agreements.
Human rights	Human rights protect the dignity of all human beings. These are rights that apply to every single person, at all times and anywhere in the world. Human rights are laid down in the Dutch Constitution and in national and international laws and regulations.
Stedin Group	All entities that are part of Stedin Group, including Stedin Netbeheer, DNWG Infra and NetVerder.
Expect	Where the policy uses the term 'expect', we mean that we will encourage our suppliers and partners in the value chain to comply with the policy. Where necessary, we will hold them accountable for non-compliance and exert our influence to achieve compliance.
Business contacts	Anyone with whom Stedin Group has a relationship in its value chain, directly or indirectly, in the course of its business.
Self-determination	The right to own choices and independence, both of the individual and a collective.