



# NIE NETWORKS CODE OF ETHICS



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## MESSAGE FROM DEREK HYNES

Our Code is a guide for everyone at NIE Networks on how to behave as part of an ethical company. This means doing the right thing for society, for our customers and for one another.

Being an ethical company is grounded in the steps that each one of us takes every day to live our Values and demonstrate our Behaviours whether or not anyone is looking - moments that show that we are courageous, accountable, respectful and empathetic (i.e that we CARE).

This guide provides information on the way we do business, why this is important for NIE Networks and what we expect from you. Working together, to the standards we have set will ensure an open and positive culture and best outcomes for all.

Each of our jobs involves judgement, and this guide will help us get those judgements right. It doesn't contain the answers to everything but it shows how we should all go about our jobs.

However, it is ultimately up to each one of us to take responsibility for our own behaviours and those of our teams and consider how these either contribute to or detract from NIE Networks' reputation.

NIE Networks holds a position of trust in the communities we serve. As we go about our working day, we all have a responsibility to live up to this trust by calling out behaviours that don't align with our Values and Behaviours and relentlessly asking the question, "Are we doing the right thing?"

I hope Our Code helps you in the important work that you do for NIE Networks and for the wider electricity system on which people, organisations and businesses in Northern Ireland depend. If you need any support understanding what is being asked of you or further details please reach out to your line manager, a senior manager, or the Company Secretary, whose contact details are available on page 30.



## OUR CODE: A QUICK GUIDE

NIE Networks' Code of Ethics (in this document referred to as 'Our Code') sets out the principles and standards we must all adhere to in conducting our business to achieve our Vision of Delivering a Sustainable Energy System For All.

Following Our Code, not just to the letter but also in spirit, is in essence, about continually striving to work in a way that demonstrates the highest standards of safety, integrity, loyalty, fairness, and confidentiality: – that means always complying with the laws and regulations where NIE Networks operates, as well as following all policies, procedures and guidelines that relate to what you are doing.

All employees are required to confirm that they have read and understood Our Code by completing e-learning annually.

### 1. Obey all laws, regulations, and follow all policies and guidance

Our Code is set in the context of laws, regulations and company policies.

NIE Networks' is a regulated Company and its business activities are regulated by the Northern Ireland Authority for Utility Regulation (the Utility Regulator or the UR). The Company must comply with the obligations set out in its Transmission and Distribution licences, its obligations to facilitate competition in connections, the Compliance Plan in relation to the Company's independence from the rest of the ESB Group, and other regulatory requirements set by the UR.

Working ethically means every one of us has to comply with the laws and regulations applicable to the function in which we work and the obligations put in place by Regulators and also follow all Company policies, procedures and guidelines that relate to what we are doing.

We must complete all mandatory training required of us in relation to the Company's policies, procedures and guidelines.

### 2. Always act in the interests of NIE Networks, our colleagues and everybody with whom we do business

When we live Our Code:

- We know what standards are expected of us, in what we are doing;
- We understand what each of us must do personally to meet and reach beyond these standards; and
- We choose to take responsibility and do the right thing.

We never do anything that would violate Our Code, and if we believe that a violation has occurred we immediately report it.

## WE ALWAYS, WE NEVER

### We always

1. We always work to protect ourselves and others from risks to health and safety at all times.
2. We always respect the human rights of everyone we come into contact with at work.
3. We always make sure that everyone in NIE Networks is clear on what is expected of them and has the opportunity to reach to their full potential.
4. We always deliver a professional, efficient service to our customers and make it easy for them to do business with us.
5. We always ensure that our business records are complete, accurate and appropriately authorised.
6. We always respect privacy rights and protect NIE Networks' data, information and networks from cyber risks.
7. We always respect and protect NIE Networks' property and resources and avoid using them for any improper purpose.
8. We always manage our finances carefully so that NIE Networks maintains financial stability ensuring that we can deliver our ambitious plans.
9. We always endeavour to work alongside companies which meet our standards and are aligned with our ways of working.
10. We always communicate with our stakeholders in a transparent way.
11. We always act responsibly to protect the environment and climate. We are committed to delivering positive environmental and social impacts from our business.

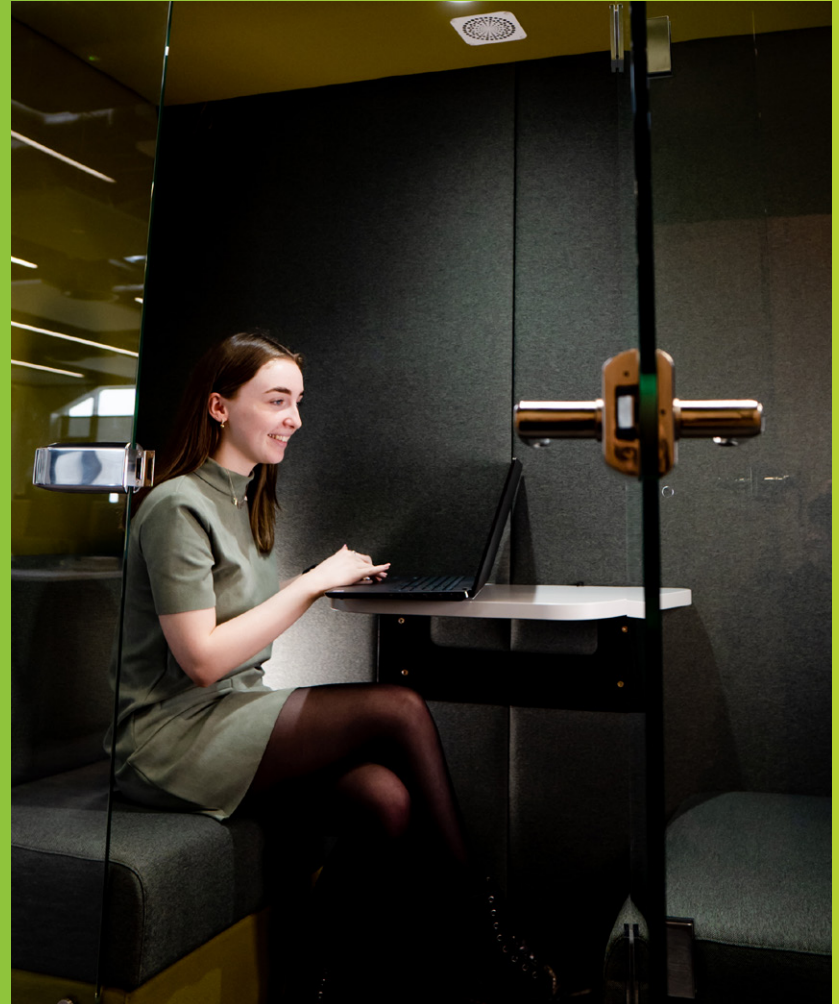
### We never

1. We never expose NIE Networks' IT and digital systems to harm, so that we protect NIE Networks' cyber security and the confidentiality of all Company and personal data.
2. We never penalise anyone disclosing instances of breach.
3. We never tolerate or engage in any activity that could lead to modern slavery.
4. We never defraud or deceive anyone, or act dishonestly, and we protect the Company against fraud.
5. We never do anything that will create a conflict of interest. It's the only way to ensure that all our decisions are made in the Company's best interests.
6. We never accept or offer gifts or hospitality that could influence or be perceived as influencing a business decision.
7. We never tolerate bribery or corruption in any form.
8. We never use or share inside information about NIE Networks (or any other company)
9. We never disclose confidential Company information to third parties unless required by law to do so.
10. We never damage the reputation of NIE Networks through our own use of social media.
11. We never abuse a dominant position we may have in any market where we are active and never collude with competitors.

### 3. ASK FOR HELP

At NIE Networks we are a team and value teamwork. If you need help understanding policies, procedures or guidelines we have subject matter experts who can provide practical guidance and advice and further information is provided on page 30.

These subject matter experts include Safety, Regulatory Compliance, IT, Sustainability & Environment, Communications and the Company Secretary, and contact details are provided on page 30.



# ABOUT OUR CODE

## ABOUT OUR CODE

### Who Our Code is for?

Our Code is for the use of all permanent and temporary employees and directors of NIE Networks, agency staff and trainees. Contractors, external consultants and other third parties acting on our behalf and contractors/suppliers providing services to us are also expected to conduct themselves in accordance with the principles of Our Code as well as the Requirement for Contractors – Business Ethics. We are committed to working solely with partners, contractors and third parties that have values and standards consistent with Our Code.

### We are all responsible

NIE Networks' reputation as a trusted and responsible organisation is the responsibility of every one of us. By following Our Code, we all play a part in upholding and enhancing the respect NIE Networks holds as a business and employer.

Doing the right thing by ourselves, our colleagues, the Company, and the people who depend on us at NIE Networks to do our job properly, includes seeking advice, raising concerns or reporting evidence pointing to wrongdoing.

### Managers provide guidance

As well as following Our Code, managers tell people about it, help everyone understand it and lead by example. Managers liaise with the Company Secretary on matters disclosed by employees under Our Code including in relation to potential conflicts of interest, gifts and hospitality and concerns reported. Managers also ensure that any breaches are reported so that our highest standards are maintained. Managers should follow the Guidance for Managers on Our Code.

### The Company Secretary

The Company Secretary owns the Code of Ethics which is one of a suite of policies that is intended to guide the decisions and actions of the Company's employees, contractors, partners and suppliers.

The Company Secretary ensures communication and awareness of Our Code across the organisation and proposes updates and revisions to Our Code. The Company Secretary reviews ethical issues organisation wide and considers what actions are needed to ensure that Our Code is adhered to. The Company Secretary provides advice and co-ordinates the investigation of reported breaches of Our Code and reports details to the Executive Committee, the Audit & Risk Committee, and the Board.

### The role of NIE Networks Board

The Board provides NIE Networks' leadership and retains overall responsibility for the Company's governance framework, internal controls and risk management including Our Code and is responsible for reviewing and approving any proposed changes to Our Code. The Board's Audit & Risk Committee receives reports on any significant breaches of Our Code.

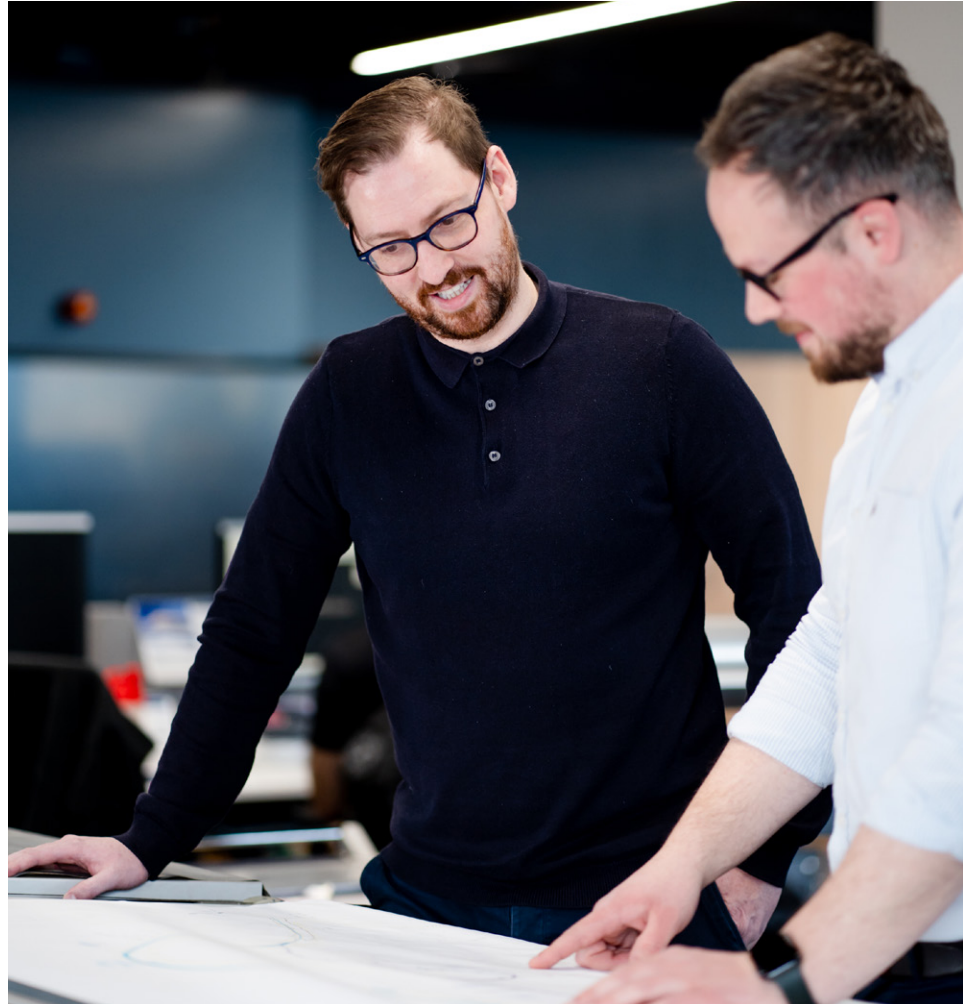


## BREACHES OF OUR CODE ARE A SERIOUS MATTER

The trust of our customers and other key stakeholders is vital to us. It is important that we maintain this trust. If you are found guilty of breaching Our Code, you may face a disciplinary process in accordance with NIE Networks' Disciplinary Procedures, and if you are found to have committed a violation, you will be penalised in such a way as to reflect the seriousness of the offence, up to and including dismissal. Depending on the nature of the breach, NIE Networks may report the matter to the Police Service of Northern Ireland.

Where we become aware of breaches of Our Code in relation to Terms and Conditions agreed with a contractor, supplier, or agency workers, we will report them to their employer and their contract may be terminated. NIE Networks may also take action to recover any losses incurred as a result of the breach.

As a company, NIE Networks complies with applicable legal and regulatory requirements set by recognised national authorities. If we don't follow these requirements we face serious consequences which may lead to civil and/or criminal prosecution.



# HOW DO I MAKE THE RIGHT DECISIONS?

## HOW DO I MAKE THE RIGHT DECISIONS?

### How can I be sure I'm doing the right thing?

Written standards like Our Code help us deal with issues that come up in our working lives. However, it isn't possible to cover every situation that might happen so, at times, we will have to use our own personal judgement.

Here you'll find some simple guidance to help get that judgement right.

### What to keep in mind when taking action or making a decision.

- Our Values – we're safety focussed, people focussed, customer focussed, commercially focussed and future focussed.
- Our Behaviours - we're courageous, accountable, respectful and empathetic.
- Any regulations, standards and laws that apply to that particular situation.
- Any policies, procedures and guidelines that relate to what we are doing.
- How might our action affect: our customers, our communities, our colleagues, our Company and ourselves.

So when faced with a choice or dilemma, think about the following:

- Does my action comply with regulations and laws?
- Is it in line with Our Values and Our Behaviours?
- Does it follow our policies?
- Does it follow procedures and guidelines?
- Does it set a good example to people with whom I work?
- Would I be happy with this if I were a customer or a member of our community?

If the answer to any of these questions is 'no', think again about what to say or do. Consider raising your concerns as outlined within our Speak Up processes which are detailed on page 12 of Our Code.

### The phrases below are like red flashing lights.

Whether we say them ourselves or hear them from colleagues, we should take a moment to check if something wrong or illegal is happening:

**No one will ever know.**

**Everyone else does it, so it must be ok.**

**Don't worry, it's the way we do things around here.**

**It doesn't matter how it gets done, just do it.**

**I don't want to know.**

# Speak Up

## How do I speak up if I have concerns?

Being courageous is one of Our Behaviours, and NIE Networks expects us to report any concerns we have of serious malpractice and wrongdoing in NIE Networks. There are people you may speak to about any concerns you have including:

1. Your Head of Department (this will generally be a senior manager reporting directly to a member of the Executive Committee) who may discuss the matter with the Company Secretary.
2. The Company Secretary (contact details are provided on page 30). If, for any reason you're not able to talk to your Head of Department, if the matter involves your Head of Department, or you would just prefer to do so then you can speak with the Company Secretary. If the issue you wish to discuss involves the Company Secretary then you can talk to the Finance Director.
3. Safecall. This is NIE Networks' external reporting facility (contact details are provided on page 12) and if you are unable to talk to your Head of Department, the Company Secretary or the Finance Director then you may contact SafeCall.

Everyone at NIE Networks should be able to ask questions and raise concerns without fear of penalisation. NIE Networks will not tolerate penalisation, including bullying, intimidation, harassment, discrimination, victimisation or disadvantage of any person who reports a concern.

There are many ways to report a concern but the most important thing of all is to speak up. NIE Networks' Whistleblowing Policy sets out procedures for raising concerns and reporting wrongdoing.

## Company Secretary

You can contact the NIE Networks' Company Secretary by email at [olivia.carr@nienetworks.co.uk](mailto:olivia.carr@nienetworks.co.uk), or by phone on 07824 488870.

## NIE Networks External Reporting Facility

The external reporting facility is operated by an independent company, Safecall, and can be contacted:



- By calling Safecall at any time on 0800 915 1571; or
- Via email: [nienetworks@safecall.co.uk](mailto:nienetworks@safecall.co.uk), or
- Via the web: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)



SECTION 1

# OUR PERSONAL AND BUSINESS INTEGRITY

## OUR PERSONAL AND BUSINESS INTEGRITY

Our customers trust NIE Networks to provide vital services in a safe and reliable manner. It's a big responsibility but it's one we all welcome. By maintaining that trust and protecting our reputation we all contribute to NIE Networks' success.

### Compliance with legal and regulatory obligations

We must know, understand and choose to comply with the laws, licences and regulatory requirements that affect our work.

As employees we are obligated to comply with requirements outlined in our contracts of employment. We are also subject to other legal requirements as defined by our job roles. It is therefore important that you speak with your Line Manager to understand what these laws are.

Regulators are treated professionally with courtesy, honesty and respect at all times. We coordinate with business or corporate experts when working with or responding to requests from regulators. We flag any potential regulatory breaches, through our line managers, the Regulatory Compliance Manager or the other reporting channels covered in the Speak Up section of Our Code.

### Conflicts of interest

We never do anything that will create a conflict of interest. It's the best way to ensure that all our decisions are made in the Company's best interests.

A conflict of interest is a situation at work in which someone is in a position to derive personal benefit for themselves or someone or something associated with them (such as a family member or friend or other organisation) from actions they take or decisions they make at work.

This can happen in many different ways, such as when we:

- are involved in activities that compete with NIE Networks or another part of the ESB Group
- have a personal interest in business transactions involving NIE Networks or another part of the ESB Group
- have family or friends who do business with NIE Networks or another part of the ESB Group

If we think that a conflict may exist, or may be perceived as such, we disclose this to our Line Manager, Head of Department and the Company Secretary by completing the Declaration Form that is available on The Wire. We promptly take action to eliminate any conflict if reasonably requested by NIE Networks to do so.

Before entering into any other employment in addition to our employment in NIE Networks, or before accepting a directorship in another company, we need to get approval from NIE Networks – by notifying our Line Manager, Head of Department and the Company Secretary of our intentions in writing and the Company Secretary will liaise with us.

We must disclose any real or perceived conflict of interest that may arise in the course of our purchasing responsibilities. If this situation arises prior to or during a procurement process that we are involved in we must report it to the Procurement Manager so that any necessary action can be taken.

## OUR PERSONAL AND BUSINESS INTEGRITY

### Gifts and Hospitality

We never accept or offer gifts or hospitality that could influence, or be perceived by others as influencing a business decision.

Engaging effectively in key business relationships (i.e. customers, contractors, suppliers, government and regulatory officials) is important to NIE Networks. Social interactions occasionally arise in such engagement and there are sensible boundaries to these which need to be observed to protect NIE Networks from potentially damaging accusations of undue influence or bias and to protect us and the Company from being in breach of the Bribery Act 2010.

For example, it may be appropriate to receive or send gifts valued at £50 or below in any 12- month period, or to accept/offer modest hospitality if it is limited, legal, and is in line with our policies. Giving and receiving gifts or hospitality of this type is acceptable provided they are unsolicited, infrequent, valued at £50 or below in any 12-month period given openly and are recorded in line with NIE Networks' Anti-Bribery, Corruption, Fraud and Other Unlawful Activities Policy.

However:

We never accept a gift of cash, or gift of a voucher, no matter what value;

We never accept gifts, benefits, sponsorship or hospitality that could be deemed to influence and/or secure favourable treatment from us or NIE Networks; and

We never offer gifts, benefits, sponsorship or hospitality that could be deemed to influence and secure favourable treatment to us or NIE Networks.

Remember that:

- In all cases, including when gifts or hospitality are declined, where the value of the offer or receipt of gifts or hospitality is £50 or more (in any 12 month period) including when gifts or hospitality are declined, we complete a Gifts and Hospitality Notification Form including having it authorised by a member of the Executive Committee. This completed form should include details of the gifts or hospitality offered and whether it was accepted or declined. Completed forms should be submitted to the Company Secretary who maintains a central Gifts and Hospitality Register;
- We need to ensure that the acceptance of any gifts or hospitality which - when taken together with any other hospitality or gifts received in the previous, amounts to over £50 in value - is properly authorised by a member of the Executive Committee) and reported to the Company Secretary for inclusion in a central Register;
- Those of us working in Procurement are generally not permitted to accept hospitality or gifts.

*Find out more in NIE Networks' Anti-Bribery, Corruption, Fraud and Other Unlawful Activities Policy, and Gifts and Hospitality Notification Form.*

## OUR PERSONAL AND BUSINESS INTEGRITY

### **Fraud, deception and dishonesty**

We never defraud or deceive anyone, or act dishonestly, and we always protect the Company against fraud.

We will never seek to benefit from fraud, deception or false claims, or allow others to do so on our behalf. This includes defrauding or stealing from the Company or any third party, and any kind of misappropriation of property. We all hold the trust of NIE Networks, to make honest use of any funds, assets and properties that we are trusted to look after. Expense claims and working time records that we submit always accurately reflect our efforts on behalf of the Company and are in compliance with relevant policies and procedures.

*Find out more in NIE Networks' Anti-Bribery & Corruption, Fraud and Other Unlawful Activities Policy, and Expenses Policy.*

### **Bribery and corruption**

We never tolerate bribery or corruption in any form.

A bribe is an inducement or reward offered, promised or provided with the intent or expectation that a function will be improperly performed in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence (under the Bribery Act 2010) to offer or accept a bribe; to bribe foreign public officials; to make facilitation payments; and for companies to fail to prevent bribery by those acting on their behalf.

We never offer or accept a bribe and never participate or facilitate corrupt or illegal activities.

We always follow the Company's Anti Bribery, Corruption, Fraud and Other Unlawful Activities Policy and seek advice from a senior manager or the Company Secretary if in doubt.

*Find out more in NIE Networks' Anti-Bribery, Corruption, Fraud and Other Unlawful Activities Policy.*

### **Financial Control**

We always manage our finances carefully so that NIE Networks maintains financial strength to support the delivery of our plans.

We must follow our internal controls which keep NIE Networks on course by promoting efficiency, reducing risk of asset loss, and helping to ensure the accuracy of financial statements and compliance with laws and regulations. The Board and its Audit & Risk Committee are responsible for ensuring that we have an effective system of internal control operating across NIE Networks and monitoring its effectiveness to provide reasonable assurance of compliance. All of us have a responsibility to implement and operate within our internal control framework and report any non-compliance issues.

Everybody has a responsibility for managing spend within approved budgets and authority levels, regardless of the size of spend or method of procurement and we all have an obligation to seek value for money and to make savings where possible.

*Find out more in NIE Networks' Authority Levels.*

### **Procurement**

We conduct procurement in an open, transparent and non-discriminatory manner. We ensure that any works, supplies and services that are bought in to NIE Networks are fairly chosen through compliance with our Procurement Policy and Procedures which comply with the obligations arising from the Utilities Contract Regulations 2016 (applicable to procurement by UK utilities).

We take advice from our Procurement Department to ensure compliance.

*For more information contact a member of the Procurement Team.*



## OUR PERSONAL AND BUSINESS INTEGRITY

### Competition in connections

NIE Networks is required to facilitate competition in connections to our network and is committed to ensuring compliance with related Competition Law requirements.

We are all expected to comply with the following principles:

- We welcome open and efficient competition in the connections market in NI;
- We are committed to delivering the non-contestable works as efficiently as possible where a customer chooses an ICP to carry out the contestable works;
- We will deliver both the non-contestable works and the contestable works as efficiently as possible where the customer chooses to proceed with NIE Networks for the full works;
- We have a zero-tolerance approach to anti-competitive conduct and are committed to fostering a competitive market for the delivery of connections in Northern Ireland.

Those of us involved in delivering a connections service must ensure that we are familiar with and comply with our Competition Law Compliance Policy and other practical advice provided, in order to ensure that NIE Networks is compliant with Competition law.

*Find out more in and NIE Networks' Competition Law Compliance Policy.*

### Inside information

**We never use or share inside information about NIE Networks (or any other company).**

The law prohibits us, either in a personal capacity or on behalf of NIE Networks, from using non-public inside information to engage in transactions in listed securities, including bonds issued or guaranteed by NIE Networks. and financial instruments (assets that can be traded).

NIE Networks identifies and informs those employees who may have access to Company inside information in their role. If identified we must ensure that we comply with all relevant policies and procedures.

If in any doubt ask for advice.

SECTION 2

# OUR PEOPLE AND WORKING RELATIONSHIPS

## OUR PEOPLE AND WORKING RELATIONSHIPS

We work together to serve the public, our customers and communities every day and know many of them as friends, colleagues and acquaintances. By continuing to care for them, and each other, and having the courage to always keep people's best interests at heart, we can ensure the whole Company keeps their respect.

### **Health, safety and personal security**

A core value is that we put the safety and wellbeing of our colleagues, customers and communities first. (Safety focussed).

At NIE Networks our approach to safety, like everything else we do, is driven by our behaviours – “CARE” – to put employees and customers at the heart of what we do and keep ourselves and others safe and healthy. Every one of us should maintain our own personal safety and the safety of our colleagues, customers, contracting partners, the public and others who may be affected by our activities. Each of us has responsibilities in maintaining a work environment where everyone goes home safe and well from work every day. When dealing with health and safety issues we always act in an open, honest and respectful way, reporting any breaches or unsafe situations as soon as possible. Being safe and looking out for each other's health, safety and wellbeing is at the core of how we work every day.

*Find out more in our Health and Safety Policy and Health and Safety Policy Statement.*

### **Human Rights**

We never tolerate slavery or human trafficking (together known as Modern Slavery) and never engage in any activity in breach of our Policy on Modern Slavery.

We recognise our responsibility to respect and promote international human rights standards in everything we do. NIE Networks expects all contractors and suppliers of goods, services or works – to the Company or on behalf of the Company – to perform their duties in an honest and ethical manner, within the law and with respect for everyone's human rights.

We are committed to acting ethically in all of our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that Modern Slavery is not happening anywhere in our business or in the organisations with who we do business.

We must all ensure that any concerns regarding human rights and Modern Slavery within NIE Networks' own operations or supply chain activity are reported immediately through the appropriate channels.

*Find out more in NIE Networks' Policy on Modern Slavery.*

## OUR PEOPLE AND WORKING RELATIONSHIPS

### **Inclusion, respect and dignity**

A core value is to act with honesty, integrity and empathy towards our colleagues at all times (People focussed).

At all times, everyone at NIE Networks is committed to fairness in our business affairs and in dealing in a fair and respectful way with every person we interact with. As well as being responsible for our own behaviour, we always take an inclusive and open-minded attitude with colleagues, customers and suppliers, treating everyone with courtesy and respect.

As part of its overall commitment to equality of opportunity NIE Networks aim is to promote a supportive and harmonious working environment where everyone is treated with respect and dignity at all times and where no-one ever feels threatened or intimidated because of their age, disability, marital or civil partnership status, political opinion, race, religious belief, sex (including gender reassignment) or sexual orientation. It is NIE Networks' policy to have a fair and transparent recruitment process, where successful candidates are appointed on merit.

We can seek advice from one of NIE Networks' Dignity at Work advisors if we are experiencing any form of harassment at work.

*Find out more in NIE Networks' Respect and Dignity in the Workplace Policy & Procedures, Equal Opportunities Policy, Equality, Diversity & Inclusion Charter, and Policy and Code of Practice on Disability.*

### **Developing our people**

We always make sure that everyone in NIE Networks is clear on what is expected of them, and has the opportunity to reach their full potential.

We are committed to enabling everyone at NIE Networks to fulfil their potential and maximise the opportunities available for personal success. Every employee's contribution supports the Company's success, so that we can deliver a high standard of service to our customers.

Managing performance daily and through the Performance Development Journey process has two essential parts: developing each of us to grow in capabilities relevant to our existing roles as well as planning for our future career within NIE Networks and having clearly agreed goals which set out what is expected of us.

Each of us and our managers have a shared responsibility for delivering individual high performance, and ensuring our continuing personal and professional development.

*Find out more in NIE Networks Performance Development Journey process.*

SECTION 3

# OUR ASSETS AND INFORMATION

## OUR ASSETS AND INFORMATION

During our working day, many of us will make use of NIE Networks' property or information. The care we take in looking after these assets and the level of trust that NIE Networks places in us is an important responsibility.

### **Company property and resources**

We always respect and protect the Company's property and resources, and avoid using them for any improper purpose.

Everyone at NIE Networks is entrusted with company assets every day. Some of these are physical items, such as vehicles, tools, equipment, computer assets, phones, Company money, keys or facilities. Others are intangible such as data, intellectual property, or information.

We always make sure that we:

- only use NIE Networks' assets in a way that is reasonable, appropriate and within the law, and never use for personal gain, take, sell, lend, borrow or give away any of them without prior permission,
- keep NIE Networks' best interests in mind when spending Company money or making financial commitments on the Company's behalf,
- always follow NIE Networks' Expenses Policy and show we can be trusted and responsible when submitting travel and expense claims, or approving those submitted by others.

### **Digital Systems**

During our work we should seek to ensure that we don't expose NIE Networks' IT and Digital systems to harm, so that we protect NIE Networks' cybersecurity and the confidentiality of all Company and personal data.

NIE Networks has comprehensive cyber security measures and risk mitigations to ensure the security and confidentiality of all Company and personal data. We must all follow the policies and guidelines issued to ensure that we use the Company's digital systems appropriately, to protect NIE Networks and ourselves. We need to be particularly careful when using the internet and email, regardless of the device, so that we do not expose NIE Networks to harm.

*Find out more in NIE Networks Cyber Security Policy and related policies and guidance.*

## OUR ASSETS AND INFORMATION

### Confidentiality

We never disclose confidential information to third parties unless required by law to do so.

Information that we come across while working in NIE Networks, whether relating to customers or NIE Networks, should be treated as confidential. We must all comply with obligations in our Licences not to disclose customer information to a third party without our customer's consent, unless that information is in the public domain.

Unless authorised to do so, we never disclose confidential information or commercially sensitive information about NIE Networks' activities to any third party.

In accordance with our Licences and the Compliance Plan we must maintain NIE Networks' managerial and operational independence within the ESB Group. We treat information that is not already in the public domain with great care.

We must ensure that no specific information which is not in the public domain is provided to ESB Group at any time and for any purpose, in such a manner which would give, or be perceived to give, ESB an unfair competitive advantage in relation to its generation or supply activities. This includes information about the activities, business or affairs of any existing or prospective generator, supplier, or customer, unless there is a legitimate reason to do so (for example, there is a legal or regulatory obligation.) This also applies for any individual transmission and/or distribution investment project or infrastructure reinforcement project. We should seek advice from the Regulatory Compliance Manager (whose details are provided on page 30) if in any doubt.

We never acquire any information or business secrets by improper means. Any confidential information that comes into our possession (whether it is about NIE Networks or not) will never be used for our own or anyone else's personal gain.

If you need further information about NIE Networks' obligations in relation to customer information or in relation to our interactions with ESB please contact the Regulatory Compliance Manager.

### Data privacy and personal information

In our work we must seek to respect privacy rights and protect personal information held by NIE Networks.

In accordance with the Data Protection Act 2018 NIE Networks has in place comprehensive data protection controls and frameworks to ensure we always respect privacy rights and protect any personal data held by NIE Networks. This includes personal data in relation to employees of NIE Networks, customers, agency staff, contractors or consultants.

Any personal information which we process, or which others collect, hold or process on behalf of NIE Networks will only be used for the business purposes for which it was collected.

We ensure that Special Category data (further information about what is considered Special Category data may be found within the NIE Networks Data Protection Policy) is identified and handled with particular care.

We always:

- ensure that data subjects know who will have access to their data and what we will do with the data (via a Privacy Statement);
- consider data privacy law and whether a privacy impact assessment is required before starting any new activity involving personal information;
- contact NIE Networks' Data Protection Officer (their details are available on page 30) for advice if we are unsure if we need to be collecting or processing personal data, or if we receive a request for access to personal data; and
- report any data breach immediately to the NIE Networks Data Protection Officer.

*Find out more in NIE Networks Data Protection Policy.*

## OUR ASSETS AND INFORMATION

### External communication and social media

We never set out to damage NIE Networks' reputation.

We never set out to damage NIE Networks' reputation, through what we say in person or through our own social media channels. Everything we do or say, and everything said about us can positively or negatively impact on NIE Networks' reputation.

While social media content can be both informative and engaging, it can also be damaging. Such content is instant, widely distributed, and permanent. Remember that our social media audience may be our stakeholders, including our customers, suppliers, contractors, the community and media.

If we are posting in a personal capacity and it can be inferred that we work for NIE Networks, we need to ensure that anything we post complies with NIE Networks' codes and policies and that audiences understand that any comments we make do not necessarily represent the views of NIE Networks.

We must all take due care and attention before making comments and ask ourselves the following question: 'Could what I am saying have a negative impact on NIE Networks or our stakeholders?'

Only authorised staff will publish material, respond or comment on NIE Networks' social media channels as official representatives of NIE Networks. Only NIE Networks' Communications Team, and others specifically authorised such as Duty Incident Press Officers, handle media releases and queries. Only appropriately trained staff speak to the media. If we are considering using social media or other media channels in a business capacity or have been contacted by someone in the media we contact the Communications Team.

*Find out more in NIE Networks Social Media Policy and Camera and Smartphone Usage Policy.*

### Business and asset records

We always ensure our business and asset records are complete, accurate and appropriately authorised.

We all have a responsibility to ensure that any records we create, amend or manage on behalf of NIE Networks accurately represent the facts. We always report accurately on financial and non-financial information in order to meet our legal and regulatory obligations. Accurate recording and reporting helps people within the Company to make informed decisions about our business and helps us meet our responsibilities to the shareholder, regulators and others.

We must all:

- Understand the operational, financial and other information that needs to be maintained and provided to stakeholders;
- Make sure that there are good processes in place for collecting, checking and maintaining that information, in a secure way;
- Co-operate constructively with any internal and external reviews, audits and investigations; and
- Highlight immediately any inaccuracies or incompleteness in records.



SECTION 4

# OUR ROLE IN SOCIETY

## OUR ROLE IN SOCIETY

This is an exciting, transformational time for NIE Networks. To thrive amid all the changes, we must approach each day with the energy, passion, persistence and drive needed to succeed and make a long term difference for our customers, communities and colleagues.

### Environment and Sustainability

A core value is that we invest in innovation and sustainability today for the benefit of customers and our environment tomorrow (Future focussed).

We always act in an environmentally responsible manner, preventing pollution, addressing climate change and the wider social impacts of our operations.

NIE Networks respects our shared environment, including its biodiversity and the deep significance and meaning it holds for communities. Wherever we operate, we collaborate with those communities, customers, employees and suppliers and we carefully consider the impact of any project on the environment and on the overall welfare of the communities we serve.

We must each maintain and follow NIE Networks' management systems, standards and procedures to avoid uncontrolled emissions to the air, water or soil and to improve our energy and resource efficiency and manage to responsibly handle any waste materials.

We speak up if something doesn't feel right as we carry out our work and information has been provided on page 12 on our Speak Up processes. In the event that an incident does happen, we take appropriate remediation measures and will promptly alert the appropriate regulatory or other authorities as required.

NIE Networks is committed to ambitious carbon reduction targets: in our offices and transport and in building a smart electricity network

capable of connecting high levels of renewable generation and low carbon technologies. We must each play our part to achieve the targets set.

Every year NIE Networks lets our stakeholders know how we have performed on our carbon targets and wider Environmental, Social and Governance goals by publishing this information in our Annual Report.

*Find out more in our Sustainability Policy and Environmental Policy.*

### Engaging with customers

Our core value is to strive to continuously improve our service to customers and we are professional, accountable, helpful and responsive in all our dealings with them (Customer focussed).

Customer demands and expectations are continuously increasing fuelled by rapid advances in technology, developments in other industry sectors and competition in connections.

Delivering an excellent customer experience is part of all our roles not just for those who interact directly with customers on a day to day basis. We aim to make every customer interaction a positive one, communicating clearly and making it easy for customers to do business with us.

Our customers, and particularly vulnerable customers, are at the centre of everything we do. We are committed to providing the best possible support to the most vulnerable customers who are dependent on life-saving medical equipment or those who are identified as needing extra support due to their personal needs or circumstances. We seek to ensure that every vulnerable customer receives the help they need, when they need it.

In our engagements with all customers we are always:

- Responsive – understanding the customer's needs, showing empathy, being reliable, pro-active and solving issues;

## OUR ROLE IN SOCIETY

- Professional – respectful, competent, making the customer feel valued;
- Accountable – taking responsibility for our interactions with customers, keeping our promises;
- Helpful – being accessible, providing timely information and advice and making the whole experience easy for customers.

These guiding behaviours in every interaction will ensure we have a customer centric culture which will continue to deliver benefits to our customers, communities and our business.

*Find out more in our annual Customer Service Action Plan and Vulnerable Customer Strategy.*

### **Engaging with suppliers and other business partners**

**We endeavour to work with and alongside companies who meet our standards and are aligned with our ways of working.**

We want to do business with partners who share our values and adopt clear commitments on ethical business like those in Our Code.

Any organisation operating on NIE Networks' behalf must ensure that they conduct themselves at all times in accordance with the principles enshrined in Our Code and also with relevant policies. Those of us who have responsibility for a relationship with a business partner or with suppliers must make sure that their commitments meet our standards.

Terms and Conditions agreed with our business partners seeks to include that they:

- comply with all relevant and applicable laws, regulations and industry standards;
- are aware of Our Code and meet its principles within their own operations;

- conduct their business in an ethical manner;
- comply with the Modern Slavery Act 2015 and conduct themselves in accordance with the principles of our Policy on Modern Slavery;
- maintain a safe and healthy working environment;
- have zero tolerance for bribery and corruption in any form, including extortion and improper payments and comply with the Bribery Act 2010;
- avoid situations where a conflict of interest may occur and always disclose where a potential conflict exists;
- proactively safeguard confidential and personal information.

These are set out in our 'Requirements for Contractors – Business Ethics' which forms part of our contracts with third parties.

*Find out more in NIE Networks' Policy on Modern Slavery and Requirements for Contractors – Business Ethics.*

### **Engaging with Government, regulators and political bodies**

**We always communicate with our stakeholders in a transparent way.**

NIE Networks follows the highest ethical standards in conducting business with regulators, politicians, Ministers and Government departments. When dealing with public representatives and officials, we are committed to being truthful, accurate and meeting all applicable laws, and regulations.

We remain neutral towards political parties and do not contribute to political parties or political campaigns; and we avoid doing anything that could be construed in any way as solicitation of favour.

# DOING THE RIGHT THING, TOGETHER

## DOING THE RIGHT THING, TOGETHER

**Our Code is about knowing what is expected of each of us, understanding what that means for us and choosing to do the right thing.**

**Our Values and Behaviours, Our Code and our Company Policies help us to understand and choose the right thing to do, as individuals and together.**

**All of the Company documents referenced in Our Code can be found on the Wire and from relevant contacts detailed at the end of this document.**



### **I know**

what standards are expected of me, in whatever I'm doing.

### **I understand**

what I personally must do to meet and reach beyond these standards.

### **I choose**

to take responsibility and do the right thing.

## CONTACTS FOR FURTHER INFORMATION

Conflicts of interest  
Reporting potential  
malpractice

Olivia Carr,  
Company Secretary

Email: [Olivia.Carr@nienetworks.co.uk](mailto:Olivia.Carr@nienetworks.co.uk)  
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Health and Safety

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Head of Health and Safety

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Phone: 07825 178 580

Data Protection

Laura McGowan

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Finance

Finance Business Partner  
for your business area



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#### **NIE Networks Confidential Helpline**



Telephone: 0800 915 1571

Email: [nienetworks@safecall.co.uk](mailto:nienetworks@safecall.co.uk)

Web Reporting: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)