

CODE OF CONDUCT

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1. Management Board Foreword and Statement of Commitment

Dear Readers and Colleagues,

As one of Germany's four transmission system operators, Amprion bears a great deal of responsibility: our lines transport electricity to 29 million people and thousands of companies within our grid area. One third of Germany's economic output is generated there.

This responsibility shapes our business activities. We plan, build and operate our grid so that it can reliably, efficiently and safely transport electricity at all times. We engage in dialogue with citizens, associations, business partners, customers, politicians and authorities to achieve this.

Our core business is subject to complex legal regulations and guidelines, with which we are committed to complying. In addition, principles and guidelines form the framework for our corporate and social actions.

This Code of Conduct supports compliance with these requirements. It sets out the principles of compliance for our company, to which the Supervisory Board, the Management Board, and all managers and employees are committed. The Code of Conduct also serves as a guideline for ethical and socially responsible decision-making in our day-to-day work. The Code of Conduct outlines how we should conduct ourselves and our business, and how we expect others, particularly our suppliers and external partners, to act in return. Regardless of our daily work, we must all comply with laws, standards and guidelines, and act ethically, fairly, and with honesty, integrity and respect. Only by adhering to the high standards we have set ourselves will we be able to overcome future challenges and changes.

We therefore ask you to familiarise yourself with the contents of the Code of Conduct and contact our Compliance Organisation if you have any questions.

Dr. Christoph Müller

Peter RÜth

Dr. Hendrik Neumann

2. About us

Amprion is one of four transmission system operators in Germany. Our extra-high-voltage lines are the lifelines of society, transporting electricity for 29 million people across an area spanning from the North Sea to the Alps. We maintain a stable and secure grid while paving the way for a climate-friendly energy system.

3. Scope of application/adherence to the Code of Conduct

Our aim is to support all employees in their daily work by providing them with guidelines, binding rules and principles of conduct to help them recognise and overcome ethical and legal challenges in the interests of the company. To this end, the Code of Conduct applies to all official company matters and to all areas in which our employees are perceived as representing the company. Alongside other binding policies and specific requirements, the Code of Conduct serves as a guideline to be observed and as a point of reference for legally compliant and responsible conduct, for example when dealing with invitations, gifts or sensitive data. This forms the basis of our company-wide compliance culture at Amprion GmbH and its subsidiary Amprion Offshore GmbH (hereinafter jointly referred to as "Amprion").

Our Code of Conduct applies to all employees, interns, working students, managers, the Management Board and the Supervisory Board equally. We do not tolerate deliberate misconduct or violations of the Code of Conduct, regardless of position. ¹²

¹ The English version of these terms serves only for information. Therefore, in the event of any inconsistency between the German and the English version, only the German version shall apply.

² For the sake of readability, only the term "employees" is used throughout the following text when referring to the scope of application. However, this always refers to the stated scope of application and is not intended to be restrictive.

Our managers, in particular, act as role models for integrity and respect. As a manager, you play a special role in implementing the Code of Conduct. To create a culture characterised by mutual respect, trust and transparency, you should make every effort to promote the implementation of the Code of Conduct.

4. Responsibility as a business partner

At Amprion, we recognise our responsibility as a business partner and are committed to upholding ethical and legal standards in our business relationships. The private interests of our employees must always be kept strictly separate from the interests of the company. We do not tolerate any form of bribery, corruption, or the granting of unauthorised benefits to partners, public officials, decision-makers, or other third parties, whether direct or indirect. By corruption, we mean the abuse of entrusted power in a professional context for private gain or benefit. Examples of benefits include monetary or non-monetary gifts, donations, sponsorship or invitations in return for an action taken or not taken. Corruption encompasses both the active offering, promising, and granting of benefits (bribery) and the passive acceptance of such benefits (corruptibility) in business dealings and encounters with public officials, as defined in Section 11 (1)(2) of the German Criminal Code (StGB). Corrupt behaviour is a criminal offence in Germany and can have far-reaching negative consequences for Amprion. Amprion does not tolerate corrupt practices in any way. We expect all employees to adhere to the highest moral standards and avoid even the appearance of corruption. To avoid conflicts of interest at Amprion, we are committed to making all business relationships and decisions independently and objectively, and to never placing personal interests above those of the company in any professional or business-related context.

Our compliance management system also serves to prevent facilitation payments. So-called 'facilitation payments' refer to small amounts of money or benefits paid to public officials or other parties to speed up routine administrative actions or decisions. Amprion prohibits all forms of facilitation payments and expects all employees to refrain from taking any action that violates this prohibition.

Consultancy contracts are subject to special scrutiny at Amprion and, in accordance with the compliance guideline, undergo a compliance review as critical contracts for reasons of

transparency and risk assessment. At Amprion, we ensure that our consultants are remunerated in a manner commensurate with the value of the services they provide and their qualifications. We conduct our business exclusively through legally fault-free means and are committed to ensuring that our regularly commissioned suppliers, consultants, and contractors also take Amprion's principles of conduct into account in their own business practices. All Amprion departments that conduct business with third parties are also obliged to comply with the applicable foreign trade regulations. Particular care is required when purchasing and using goods and technologies for internal purposes.

We conduct all business relationships in accordance with recognised commercial principles and reject the use of unfair practices. We are committed to treating our business partners fairly and in a spirit of partnership, which underpins our actions. The same principle applies to fair competition. At Amprion, we are aware that anti-competitive behaviour can prevent, restrict or distort fair competition. Examples of such behaviour include direct or indirect agreements on prices, premiums, fees, or contract terms; unfair restrictions or controls on products or markets; the allocation of customers; or the sharing of markets, as well as collusion in tendering procedures. We are committed to ensuring that our business activities are always in line with the principles of fair competition.

Given our importance to the economy and society, we believe that constructive and objective dialogue with government and political party representatives is essential. To avoid even the appearance of undue influence, we remain neutral with regard to party politics and do not make donations to political parties or to organisations or foundations closely linked to political parties.

5. Social responsibility

We are aware of our responsibility to recognise, support and comply with fundamental values in the areas of human rights, labour standards, environmental protection and anti-corruption. We are committed to upholding human rights standards within our company and to protecting and treating our employees fairly. By doing so, we ensure that our business practices align with these values, demonstrating our active commitment to sustainable and responsible corporate governance. At Amprion, we are committed to a culture of equal treatment and respect. We do not tolerate discrimination on the basis of gender, race, ethnic origin, religion, sexual orientation, age or disability. We treat all employees fairly and equally, and create a working environment that is free from prejudice and discrimination.

We respect ecological standards, environmental/climate protection and human rights, as set out in the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Since 2024, we have been committed to the ten principles of the United Nations Global Compact, which emphasise our responsibility to uphold human rights. We condemn all forms of slavery, discrimination in employment and occupation, child labour, inhumane working conditions and other human rights violations, and we are committed to ensuring that our customers and business partners also share and implement these values.

6. Responsibility in the workplace

The health, safety and well-being of our employees are a top priority at Amprion. The primary goal and core message of the occupational health and safety philosophy enacted by the Management Board is therefore to ensure that all employees and our service providers go home as healthy as when they came to work. To this end, Amprion places great importance on complying with all public, regulatory and internal binding occupational health and safety obligations, as well as current industry standards.

The company has a certified occupational health and safety management system and a company health management system. Within these systems, Amprion defines suitable framework conditions, processes and measures for safe working.

At Amprion, the assets and company resources entrusted to employees are the property of the company. They should be treated in accordance with the customary due diligence requirements and protected against loss, damage, misuse and theft. Such resources may not be passed on to unauthorised third parties.

For Amprion, protecting the personal data of customers, employees and business partners goes beyond merely a legal obligation. We are committed to handling this data responsibly and transparently. This forms the basis for a trusting working relationship. We respect data protection as a personal right, complying with both the EU General Data Protection Regulation (GDPR) and applicable national requirements within the European Union. All employees are responsible for properly handling personal data and can contact our data protection organisation at any time with questions or comments on data protection.

Respect, tolerance, integrity and honesty towards our employees, customers and the general public are also of great importance in our dialogue on social media. As Amprion employees, we therefore always express ourselves respectfully and professionally.

7. Contact persons, information and reporting channels

To fulfil our commitment to always complying with legal regulations and internal rules, it is particularly important to us to be made aware of any violations or misconduct and to take any necessary follow-up measures in accordance with the legal requirements. This information may relate to legal violations or breaches of compliance regulations. Our employees, suppliers, service providers, and business partners can report violations or misconduct either through our compliance whistle-blower system, which provides an independent, impartial, and confidential reporting mechanism in the form of an external ombudsperson, or via our Compliance Officer.

The whistle-blower system ensures that reports are handled securely and in accordance with strict procedures. Amprion takes all reports extremely seriously, regardless of the channel through which they are received, and consistently follows up on them within a fair procedure.

Amprion does not tolerate discrimination against whistle-blowers following a report. In addition, whistle-blowers will not face any sanctions unless they are found to have breached their own duty. We always adhere to the principle of confidentiality within the reporting procedure. This protects the identities of the whistle-blower(s), individuals reported and any other persons mentioned in the report. This means that information is processed fairly and securely throughout the entire procedure. We have documented this procedure as information for whistle-blowers and it is available to everyone on our [website](#).

If you become aware of any violations of our Code of Conduct or irregularities, particularly suspected cases of fraud, anti-competitive agreements, corruption, money laundering, human rights violations, environmental regulations violations, or safety concerns, please inform us immediately. You can also submit this report anonymously to our independent external ombudsperson.

The contact details of the external ombudsperson and our Compliance Officer can be found on our [website](#).