

Code of conduct



1. Introduction

This code of conduct outlines a series of norms and standards that apply to all employees. They are designed to improve and maintain the quality and integrity of our activities. It is the responsibility of all those who work for GasTerra to uphold this code of conduct, both in their own work and in their collaboration with others. These norms and standards are based on two core values:

- **Respect: for each individual and for the environment**
- **Integrity: in all our actions**

We aim to apply transparency to everything we do: we are both accountable and can give a good account of ourselves.

2. Our target groups

GasTerra has five main target groups:

Customers

Customer focus is at the heart of everything we do. We strive to achieve a high level of customer satisfaction.

Employees

GasTerra is committed to being a good employer. The company offers all its employees equal opportunities when they join, throughout their career and in the terms of employment we offer, regardless of gender, race, religion, nationality or sexual orientation.

Good mutual cooperation is a key prerequisite for achieving the best results.

Shareholders

We protect the interests of our shareholders and ensure that we achieve excellent results.

Society

We fulfil an important social role and maintain an ongoing dialogue with the society in which we operate.

Suppliers and partners

When it comes to cooperation with suppliers and partners, we are dedicated to doing business with integrity. We are looking for partners who endorse our values and who abide by similar norms and standards to our own.

3. Sustainable development

GasTerra is committed to sustainable development as a basis for its strategy and actions. The economic value and social significance of natural gas as a source of energy gives us a responsibility to manage our domestic gas reserves and energy stocks in the Netherlands. GasTerra is dedicated to securing the long-term supply of gas. We encourage the safe and efficient consumption of gas and actively investigate opportunities for further applications. We are involved in the transition to a renewable energy supply.

4. Health, safety and the environment

GasTerra gives top priority to personal health, safety and environmental protection. Each member of staff is expected to work as safely as possible and to limit the risks to his or her health. He or she is obliged to report unsafe situations and to intervene without delay in the event of a dangerous situation arising. Each member of staff is also expected to work with due regard and care for the environment.

5. Ethical business practice

GasTerra naturally abides by all the relevant statutory provisions. An established reputation for reliable and fair business practice is of inestimable value to the company. GasTerra expects everyone within the organisation to act with complete integrity. Company rules and procedures must also be upheld. Our activities are governed by Dutch and EU competition rules.

The management will stand by employees who are forced to relinquish opportunities or advantages that could only have been gained by sacrificing the aforementioned principles. The company expects all its employees to behave with probity.

6. Donations to political parties

GasTerra does not give donations to politicians and/or political parties.

7. Gifts and favours

GasTerra employees are not permitted to give or accept gifts or personal favours in connection with company business. This includes all goods or services given or received with a view to improperly influencing commercial activities. Gifts or personal favours from third parties may also not be accepted in principle, unless they are incidental and do not exceed a value of € 50. Gifts or personal favours above this amount must be notified to the CFO who will decide how to dispose of them.

8. Use of company resources

Each member of staff is responsible for the correct use of company resources in his or her work. This includes not only company property and assets, but also company information and commercial rights. Company resources may only be used to achieve the company's aims and objectives. Information and means of communication (such as the Internet, e-mail and telephone) are intended only for business use. Use of these resources for private ends is permitted within acceptable limits.

9. Payments

Payments must be completed in accordance with the proper procedure established for the purpose. Payments must be business-related and never personal in nature. Expense claims must be proportional to the commercial interests involved and supported by receipts or proofs of payment. All payments made to employees by third parties in respect of activities relating to their position at GasTerra must be passed on to the company.

10. Interests outside GasTerra

GasTerra employees must avoid a conflict between their own interests and those of the company. Commercial activities engaged in by employees alongside their employment with GasTerra must not conflict with the company's interests. In the event of doubt, such secondary activities must be notified to the management. Participating interests in companies with which GasTerra does business are in principle prohibited, unless the management has given its permission. The same applies to membership of the Board of Supervisory Directors of such companies.

11. Company information

Information that could damage GasTerra if it was communicated or made available to third parties must be treated in strict confidence. Only the management is authorised to decide whether or not to publicise important information of this kind.

Business transactions must be recorded accurately, precisely and in full, in accordance with the GasTerra guidelines.

The 'provisions governing the handling of information' are applicable to the treatment of information. These provisions contain rules concerning the securing, classification and management of information and rules for the use of means of communication.

12. Compliance

Each member of staff has a duty to report identified infringements of this code of conduct. As a rule, such infringements should be reported to the individual's own department. If this is inappropriate, the individual can notify a trusted third party or report the incident directly to the management. Such notifications will be handled in the greatest possible confidence. In the event of an investigation, the source of the notification will be guaranteed protection wherever possible. All members of staff will be supervised for their compliance with the code of conduct, regardless of their level or position within the company. Infringements can lead to sanctions in the form of disciplinary measures, dismissal and/or prosecution

Annexe:

Code of conduct for safety, health and the environment

Traffic

Given that the use of mobile phones while driving reduces concentration and speed of response, employees are prohibited from using a phone (including a hands-free) while in control of a vehicle. Mobile phones may only be used when the vehicle has been brought to a standstill in a safe place.

Smoking

Smoking is only permitted in specifically designated smoking areas. Employees who wish to give up smoking can make an appointment with the company doctor to discuss the various options available for doing so.

Alcohol and drugs

Possession and use of alcoholic beverages and/or drugs at the workplace is prohibited. Alcoholic beverages may only be served at events organised by GasTerra (such as receptions, farewell drinks parties, departmental gatherings, etc.). Such events require the permission of the CEO.

A wide range of non-alcoholic beverages will be served at these events and only light alcoholic beverages (such as beer and wine) will be provided. Employees must behave responsibly at all such events.

Managers will be expected to set an example. All employees are expected to call one another to account and to assist and intervene where necessary.

Employees who are guests at functions in connection with their work will be expected to behave responsibly with regard to the consumption of alcoholic beverages.

Employees are naturally not permitted to be at work under the influence of alcohol and/or drugs. Members of staff who are overseeing entry to the premises, colleagues and line managers are responsible for reporting any infringements, and line managers are responsible for taking appropriate action. Such action could include calling in the company doctor or taking disciplinary action.

(Definition: 'Drugs': any stimulating, narcotic or mind-altering substance, as covered by the Opium Act. 'Alcohol': a constituent of alcoholic beverages and a narcotic substance not covered by the Opium Act.)

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