Code of Conduct

of

AGGM Austrian Gas Grid Management AG
As of 26.06.2017

Code of Conduct

In its role as market area manager and distribution area manager, AGGM Austrian Gas Grid Management AG (AGGM) is responsible for the management of the gas grids in all of Austria's distribution areas as well as the transmission systems in the Eastern market area (in the following: "Austria's gas networks"). AGGM is also an independent system operator, playing a central part in supporting the operation of the gas market throughout the country and across borders.

AGGM is a public limited company established under Austrian law (*Aktiengesellschaft*). With regard to legal form, structure and decision-making powers, this type of organisation allows AGGM to maintain the necessary independence from activities unrelated to its role as market area manager and distribution area manager.

AGGM fulfils the responsibilities conferred on it in accordance with sections 14 and 18 of the Gaswirtschaftsgesetz 2011 (GWG, Natural Gas Act) and in accordance with the Energielenkungsgesetz (EnLG, Energy Intervention Powers Act). In its role as distribution area manager, AGGM's responsibilities essentially comprise network access and capacity management, gas flow control, long-term planning for the level 1 distribution system as well as crisis management in cases of congestion. In its role as market area manager, its responsibilities essentially comprise the coordinated planning of network development, the preparation of a capacity calculation model, setting up and operating an online platform as well as balance group management, balancing, the control of the market area and coordinated maintenance of the online platform, including numerous publications.

AGGM's Code of Conduct covers all of the core aspects of the company: people, health, safety and relationships with our environment.

As an Austrian company based in Vienna, we are committed to the liberalisation of the Austrian natural gas market as specified in the Natural Gas Act and follow this principle in meeting our business responsibilities. We support the ongoing development of a competition-based and competitive energy market in Austria.

Our overriding goal is to ensure the uninterrupted supply of gas to Austrian consumers and to balance and maintain the stability of Austria's gas networks. By meeting our responsibilities, we make a key contribution to safeguarding with lasting effect the supply of gas to all of Austria's distribution areas.

As an independent system manager, we ensure the safe, cost-effective, environmentally friendly and efficient operation of Austria's gas networks, even across borders. In awareness of our special responsibility towards market participants as well as society at large, we act in accordance with the principles set out below.

Stakeholders

Responding to the needs of the various market participants in AGGM's environment is of special concern. As a service provider, we encourage collaboration and a cooperative style of activity.

Serving as a knowledge-based centre of expertise for the liberalised gas market, we provide our services reliably and promptly while upholding superior quality standards. In doing so, we comply with the principles of equal treatment and non-discrimination. Where equal conditions exist, all market participants are treated equally.

Clear and open communication

AGGM engages in professional, respectful and constructive dialogue with all of its internal and external stakeholders. We take care to ensure that our conduct is open and transparent.

Cooperation

We build sound, long-lasting partnerships geared towards the needs of the market. As part of meeting our responsibilities, we proactively support change processes affecting the legal framework in Austria and Europe. We take an unbiased, constructive approach to dealing with cases of conflict.

Confidentiality

We make sure that information entrusted to us by market participants is handled confidentially. Information is not shared with other parties or used for any other purpose without the consent of the market participant concerned.

Management

The company's responsibilities and powers are publicly disclosed. AGGM has an established, consistent management system meeting international standards, which ensures that AGGM's market-driven structure is maintained.

We accept challenges and take responsibility for our conduct. Our lean, needs-based business organisation ensures our ability to meet our statutory responsibilities and deliver services reliably, cost effectively and efficiently and with minimal environment impact, for the benefit of our customers.

People

Our skilled and motivated employees are the most important key to the company's success. We encourage and expect staff to take responsibility for their own work and to work independently. The management plays an active part in promoting an extensive training and development programme, the improved design of individual working conditions, and the physical and mental well-being of our employees.

Compliance

In conducting business we comply with all applicable legal regulations and fulfil the terms of all the contracts and agreements that we enter into.

Competition

We are committed to fair competition. We do not tolerate unethical business practices. We consequently disapprove of agreements in breach of anti-trust legislation as well as corruption or bribery of any kind.