

Vattenfall Networks Limited

Compliance Report 2024/2025

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1. Introduction

This report is for the year to 31 March 2025, as required by Standard License Condition 31C paragraphs 7 to 10 of the Electricity Distribution License of Vattenfall Networks Limited (hereinafter referred to as VNL). The report describes VNL's compliance with the Relevant Obligations as they are according to the license condition 31C paragraph 12 and how VNL has implemented the practices, procedures, and systems adopted in accordance with the Compliance Statement of VNL. The report also describes the activities of the Compliance Officer and findings noted by the Compliance Officer.

2. Compliance Officers review work with the Relevant Obligations

The monitoring and review work has been performed by the Compliance Officer, who is independent of the operations of VNL and independent of the management of VNL and reports to the management of the business unit "Network Solutions", which includes VNL. The approach focuses on the Compliance Statement prepared by VNL and the requirements of the Standard License Condition and includes areas such as operational and managerial separation, financial independence, training of staff, access to confidential information, cross subsidization and branding.

VNL has according to the license condition 31C paragraph 5 ensured the Compliance Officer access to premises, systems, information and documentation, and has also provided the Compliance Officer with relevant resources required for the fulfilment of the Compliance Officer's tasks and duties.

During the Relevant year, Vattenfall started the assessment of ownership of VNL, which will continue over the following compliance year. Unbundling and regulatory license conditions has, inter alia, been taken into account on the assessment.

To summarize this Compliance Report, the review work clearly demonstrates that VNL are compliant with the Relevant Obligations.

3. Findings

3.1. Operational and managerial separation

VNL is a wholly owned subsidiary of Vattenfall AB. VNL's business is organized in the Business Area BA Distribution. BA Distribution also contains the Distribution businesses in Sweden. The head of BA Distribution reports directly to the CEO of Vattenfall AB. Vattenfall AB has no decision making rights regarding the daily operations or any assets in any of the legal entities in BA Distribution which ensures that VNL can maintain the managerial and the operational independence of any Relevant Undertaking in the Vattenfall Group. The management and board members are not part of another Relevant Undertaking. The Managing Director of VNL has three direct reportees; a Business Development Manager, a Regulation- and Commercial Manager and a Delivery and Operations Manager. All other VNL staff reports to one of the three managers.

VNL uses the Vattenfall Group logo, which is common for the whole Group. However, VNL's name contains the unique abbreviation 'IDNO' to clarify its

business activities in marketing and in ongoing dialogues with the company's customers and in any other communication activities. By using this abbreviation in its name, VNL ensures that the brand used by VNL is fully compliant with the Relevant Obligations.

3.2. Financial independence

As part of the Group's corporate planning process, VNL each year compile a 5 year business plan and budget for the following year. This contains overall numbers including the expected total capital requirements for each year, it does not contain details of specific projects. VNL spend and sets the budget independently from Vattenfall AB.

3.3. Training of staff

All VNL staff has undertaken the e-training "Unbundling – because we promote fair competition". The training is provided via an e-learning module which is available for all staff in the Vattenfall Group and is mandatory for all staff, including external staff, in VNL. The e-training are to be undertaken at least once every three years and it ensures that all staff in VNL have the awareness of the Relevant Obligations so they can conduct themselves to ensure the integrity of unbundling on a day to-day basis.

In accordance with the Compliance statement, VNL has procedures for the event that any member of staff transfer to any Relevant Undertaking. In the event of staff transfers to another Relevant Undertaking, such staff undergo the unbundling training and are then separated from the IDNO business for 6 months before entering the new role. During the Relevant year no such transfer has taken place.

3.4. Access to confidential information

Any Confidential Information that VNL handles in its business operations are kept separate to any Relevant Undertaking. Unstructured data, for example text data, are classified to ensure that confidential information is kept confidential. Restricted access to premises and systems where such Confidential Information are kept or are handled ensures VNL's independence of any Relevant Undertaking. In addition, a Document Controller has been employed by VNL which has improved oversight over access and structure for the management.

In relation to previously mentioned Vattenfall assessment of ownership of VNL, documents relevant for the process are marked confidential and cannot be

accessed by other Vattenfall businesses. Such documents requires confidentiality agreements in order to access.

3.5. Cross-subsidization

To be cost-efficient, VNL purchases services provided by the Vattenfall Group. The costs of the services are in proportion to VNL's use of the service. There are documents that describes how the prices for the services are calculated and there is a mutual agreement on this.

3.6. Complaints and incidents

Any complaint or incident regarding VNL's compliance with the Relevant Obligations shall be made available to the Compliance Officer at the time it comes to the knowledge of any person employed by VNL. The Compliance Officer and Vattenfall's corporate Unbundling Officer for the UK are then responsible for investigating the complaint or incident. During the year under review, no complaint or incident has occurred. Therefore, the instruction written last compliance year describing how to step-by-step handle an incident or complaint, has not had a reason to be used for the Relevant year and the Compliance Officer has not started an investigation based on any complaint or incident.

VNL's Compliance Statement has been updated and published at VNL's webpage as well as the Compliance reports for 2020/2021, 2021/2022 2022/2023 and 2023/2024.

4. Contact

Any queries relating to this report should be sent to:

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