



Energinet's Self-assessment questionnaire

1. POLICY COMMITMENT

QUESTION	POLICY	ENTER ANSWER	COMMENTS	ELABORATE	EVALUATION	FOLLOW UP ACTIONS
1.1	Does your company have one or several written policies in which the company commits to respect human rights, labor rights, environmental regulations and anti-corruption?		<p>If yes, please send a copy of the relevant policy/policies.</p> <p>If no, please describe why not, including your main challenges, and inform whether your company is considering preparing one.</p> <p>If in process, please elaborate.</p>			
1.2	Has the policy/policies been approved by top management?		<p>If yes, please inform the date when the policy/policies were approved and which employee(s) from the top management who have approved the policy/policies including full name and job title.</p> <p>If no, please describe why not.</p>			
1.3	Is/are the policy/policies publicly available, e.g. on your company's website?		<p>If yes, please share the link to the website where the policy/policies are publicly available.</p> <p>If no, please describe why not.</p> <p>If in process, please elaborate.</p>			
1.4	Does the policy/policies include a commitment to meet relevant national legal requirements?		<p>If no, please explain why not.</p>			
1.5	Does the policy/policies include a commitment to meet internationally recognized human rights standards?		<p>If no, please explain why not.</p>			
1.6	In case of a conflict between your commitment to comply with international standards or national legislation providing less protection, do you then give preference to the international standards?		<p>If no, please inform us about the rationale behind your approach.</p>			
1.7	Have internal stakeholders been engaged in developing the policy/policies?		<p>If yes, please explain shortly how you have engaged with internal stakeholders.</p> <p>If no, please explain the reasons for not engaging, including your main challenges.</p>			
1.8	Have external stakeholders been engaged in developing the policy/policies?		<p>If yes, please explain shortly how you have engaged with external stakeholders.</p> <p>If no, please explain the reasons for not engaging, including your main challenges.</p>			
1.9	Do your policy/policies clearly communicate expectations to your business partners?		<p>If no, please explain why not, including your main challenges and whether you are considering making any changes in your communication with your business partners in the supply chain.</p>			

1.10	Does your company require in contracts with 1st tier suppliers used for the performance of this contract that they have a policy commitment on human rights, labor rights, environmental regulations, and anti-corruption?		If yes, please send a copy of one of your contract clauses. If no, please explain why not, including your main challenges and whether you are considering applying such contract requirement.			
1.11	Does your company regularly evaluate the relevance of your policies?		If yes, please indicate how often.			
1.12	Does your company regularly up-date your policies?		If yes, please indicate how often.			

2. COMMUNICATION

QUESTION	COMMUNICATION OF POLICY	ENTER ANSWER	COMMENTS	ELABORATE	EVALUATION	FOLLOW UP ACTIONS
2.1	Does your company communicate your policy commitment to all employees in the organization involved in the performance of this contract?		If yes, please describe how. If no, please describe why not. If in process, please elaborate.			
2.2	Does your company communicate your policy commitment in writing to suppliers or other business partners involved in the performance of this contract?		If yes, please describe how. If no, please describe why not, including your main challenges, and whether you are considering making changes to your communication with business partners and suppliers in the supply chain. If in process, please elaborate.			
2.3	Does your company encourage your suppliers to communicate your or their own policy commitment to their own suppliers involved in the performance of this contract?		If yes, please describe how. If no, please describe why not. If in process, please elaborate.			
2.4	Have the procedures and systems of accountability for compliance with the policies been communicated internally?		If yes, please describe how, e.g. use of whistleblower system or something similar. If no, please describe why not. If in process, please elaborate.			
2.5	Have personnel in relevant business functions involved in the performance of this contract been provided training in the policies?		If yes, please describe how. If no, please describe why not. If in process, please elaborate.			
2.6	Have external business partners involved in the performance of this contract been provided training in the policies?		If yes, please describe how. If no, please describe why not. If in process, please elaborate.			
2.7	Have you communicated externally to business relations the procedures and systems of accountability for compliance with the policies, including the consequences for breaches, in relation to the performance of this contract?		If yes, please describe how, e.g. use of whistleblower system or something similar. If no, please describe why not. If in process, please elaborate.			

2.8	Have you communicated externally to other stakeholders the procedures and systems of accountability for compliance with the policies, including the consequences for breaches, in relation to the performance of this contract?		<p>If yes, please describe how, e.g. use of whistleblower system or something similar.</p> <p>If no, please describe why not.</p> <p>If in process, please elaborate.</p>			
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3. DIVISION OF RESPONSIBILITY

QUESTION	DIVISION OF RESPONSIBILITY	ENTER ANSWER	COMMENTS	ELABORATE	EVALUATION	FOLLOW UP ACTIONS
3.1	Does your company have an appointed (a) person(s) at senior level responsible for compliance with the fundamental conditions and principles related to human rights, labor rights, environmental regulations, and anti-corruption?		<p>If yes, please provide contact details to the responsible person(s).</p> <p>If no, please describe why not.</p>			
3.2	Has the appointed person delegated the daily responsibility for monitoring compliance with human rights, labor rights, environmental regulations, and anti-corruption in relation to the performance of this contract to any other person or unit in the company?		<p>If yes, please provide contact details to the responsible person(s)/unit.</p> <p>If no, please describe why not.</p>			
3.3	Does your company have an escalation process for decision-making with regards to non-compliances with human rights, labor rights, environmental regulations, and anti-corruption in relation to the performance of this contract?		<p>If yes, please inform how the system is organized (e.g. <i>minor failure to comply is handled locally; more severe failures are handled by the appointed person at senior level and the most severe failures are handled the management board</i>).</p> <p>If no, please describe why not.</p> <p>If in process, please elaborate.</p>			

4. RISK ANALYSIS

QUESTION	RISK ANALYSIS – OWN OPERATIONS	ENTER ANSWER	COMMENTS	ELABORATE	EVALUATION	FOLLOW UP ACTIONS
4.1	Have any relevant risks for the performance of this contract related to human rights, labor rights, environmental regulations, and anti-corruption in your own operations been identified by your company?		<p>If yes, please describe the main risks and why you think they are main risks (<i>a variety of factors related to your company's own operation may contribute to the identification of main risk, e.g. the sector, the site/location of your own production, the location for delivery of this contract etc.</i>).</p> <p>If no, please describe why not and inform when you are planning to make a risks assessment.</p>			
4.2	Does your company have a written procedure by which it regularly seeks to identify risks related to human rights, labor rights, environmental regulations, and anti-corruption in its own operations?		<p>If yes, please describe the procedure shortly.</p> <p>If no, please describe why not, including your main challenges, and inform if you are about to establish one or is planning to do so.</p> <p>If in process, please elaborate.</p>			

4.3	Does your company have a developed methodology to prioritize your risks related to the performance of this contract?		<p>If yes, please describe the methodology shortly (<i>e.g. if the components of product that you delivers is produced in high risk countries in terms of low labor standards or environmental protection, this may call for a prioritization</i>).</p> <p>If no, please describe why not, including your main challenges, and inform how you otherwise would prioritize your risks.</p> <p>If in process, please elaborate.</p>			
4.4	Have external stakeholder been engaged in the assessment of risks for this contract(s) as mentioned in question 4.1?		<p>If, yes please explain how and explain whether it provided you with any added value.</p> <p>If no, please explain why not, including your main challenges.</p>			
4.5	Have an assessment of potential stakeholders that could be impacted by your company's activities as a result of the performance of this contract been conducted by your company?		<p>If yes, please inform about your findings.</p> <p>If no, please explain if you are considering making such an assessment and if so, when.</p> <p>If in process, please elaborate.</p>			
QUESTION	RISK ANALYSIS – SUPPLY CHAIN	ENTER ANSWER	COMMENTS	ELABORATE	EVALUATION	FOLLOW UP ACTIONS
4.6	Have any relevant risks for the performance of this contract related to human rights, labor rights, environmental regulations, and anti-corruption in the supply chain been identified by your company?		<p>If yes, please describe the main risks and why you think they are main risks (<i>a variety of factors related to your supply chain may contribute to the identification of main risk, e.g. the sector, the site/location of your supply chain, untransparent supply chain etc.</i>).</p> <p>If no, please describe why not and inform when you are planning to make a risks assessment.</p>			
4.7	Does your company have a written procedure by which it regularly seeks to identify risks related to human rights, labor rights, environmental regulations, and anti-corruption in the supply chain?		<p>If yes, please describe the procedure shortly.</p> <p>If no, please describe why not, including your main challenges, and inform if you are about to establish one or is planning to do so.</p> <p>If in process, please elaborate.</p>			
4.8	Have the 1st tier supply chain that is relevant for the performance of this contract been mapped?		<p>If yes, just shortly describe the geographical location of the suppliers.</p> <p>If no, please describe why not, including your main challenges.</p> <p>If in process, please elaborate.</p>			
4.9	Have the supply chain that is relevant for the performance of this contract beyond the 1st tier been mapped?		<p>If yes, just shortly describe the geographical location of the suppliers.</p> <p>If no, please describe why not, including your main challenges.</p> <p>If in process, please elaborate.</p>			

4.10	Does your company have a developed methodology to prioritize your potential supply chain risks related to the performance of this contract?		<p>If yes, please describe the methodology shortly (<i>e.g. if the components of product that you delivers is produced in high risk countries in terms of low labor standards or environmental protection, this may call for a prioritization</i>).</p> <p>If no, please describe why not, including your main challenges, and inform how you otherwise would prioritize your supply chain risks.</p> <p>If in process, please elaborate.</p>			
4.11	Have you assessed if any of your business practices may cause or contribute to causing your suppliers failing to comply with the principles and conditions on human rights, labor rights, environmental regulations, and anti-corruption in the supply chain relevant for the performance of this contract?		<p>If yes, please inform us about the potential practices that have been identified.</p> <p>If no, please inform us if you are considering making such assessment.</p> <p>If in process, please elaborate.</p>			
4.12	Does your company collaborate with business partners or other external stakeholders in identifying risks in the supply chain relevant for the performance of this contract?		<p>If yes, please inform us about your partners.</p> <p>If no, please inform us if there is any potential, whether it has been considered and why not pursued.</p>			
4.13	Does your company have a published modern slavery statement under the UK Modern Slavery Act or similar during the last year?		<p>If yes, please explain the main findings without disclosing confidential information. In case you have published a Modern Slavery Statement under the UK modern slavery act, please provide a copy.</p>			
4.14	Is your company capable of tracing the origin of main raw materials used for the product(s) to this contract?		<p>If, yes please explain how you document the origin of the raw materials of the product(s).</p> <p>If no, please explain why not, including your main challenges and if you are planning to focus on traceability.</p>			
4.15	Does the product(s) covered by the contract, or any parts thereof contain one or more of the following minerals: <i>tantalum, tin, tungsten, or gold</i> ?		<p>If yes, please specify which and fill in the 'Conflict Mineral Reporting Template' and send to us.</p>			

5. RISK MANAGEMENT

QUESTION	RISK MANAGEMENT – OWN OPERATIONS	ENTER ANSWER	COMMENTS	ELABORATE	EVALUATION	FOLLOW UP ACTIONS
5.1	Have you conducted any activities in the last 3 years to mitigate risk or monitor compliance in your own operations relevant for the performance of this contract?		<p>If yes, please explain what activities have been conducted (<i>e.g. internal audits, trainings, risk management review, due diligence activities etc.</i>).</p> <p>If no, please explain why not with reference to question 4.1.</p>			
5.2	Does your company have an established model for managing the risks related to the performance of this contract within your own operations as described under question 4.1/4.2?		<p>If yes, please explain how you manage the risks within your own operations as described under question 4.1 related to the performance of this contract.</p> <p>If no, please inform how you are intending to manage such risks, including your main challenges.</p> <p>If in process, please elaborate.</p>			

5.3	Have you allocated any human or financial resources dedicated to managing the potential risks related to the principles and conditions?		Indicate yes, if you have allocated either human or financial resources or both. Please explain the level of resources in terms of numbers of staff and if they have any experience with such management as well as a confirmation of financial allocation (not necessary the amount, but you should inform if your allocation reflects an assessment of the need). If no, please explain why not, including your main challenges.			
5.4	Has any of your employees involved in the performance of this contract received training on how to manage potential risks?		If yes, please indicate the nature of the training. If no, please indicate if you have considered such training, what has been done, including your main challenges.			
5.5	Does your company have a mechanism for receiving complaints for non-compliance with the principles and conditions related to human rights, labor rights, environmental regulations, and anti-corruption that is relevant for the performance of this contract?		If yes, please explain the system (e.g. <i>who can file a complaint, what complaints can be filed, and how complaints would be dealt with/managed</i>) even if you don't have a written formalized process. If no, please explain why not, including your main challenges and if you are considering establishing a complaint mechanism.			
QUESTION	RISK MANAGEMENT – SUPPLY CHAIN	ENTER ANSWER	COMMENTS	ELABORATE	EVALUATION	FOLLOW UP ACTIONS
5.6	Have you conducted any activities in the last 3 years to mitigate risk or monitor compliance in the supply chain relevant for the performance of this contract?		If yes, please explain what activities have been conducted (e.g. internal audits, trainings, risk management review, due diligence activities etc.). If no, please explain why with reference to question 4.6.			
5.7	Does your company have an established model for managing the risks related to the performance of this contract within your supply chain as described under question 4.6/4.7?		If yes, please explain how you manage the risks within your supply chain as described under question 4.6 related to the performance of this contract. If no, please inform how you are intending to manage such risks, including your main challenges. If in process, please elaborate.			
5.8	Have you included a clause on compliance with the principles and conditions related to human rights, labor rights, environmental regulations, and anti-corruption in contracts with suppliers relevant for the performance of this contract?		If yes, please inform how you are monitoring the compliance with the clause. If no or only in some case (<i>we recognized that you may not have such clause with all suppliers and or only few, consequently the answer could be both yes and no</i>), please inform how you otherwise ensure that these suppliers comply with the principles and conditions related to human rights, labor rights, environmental regulations and anti-corruption and potential challenges you are facing in implementing this procedure.			
5.9	Is your company able to provide us (or a 3rd party on our behalf) access to your own premises, interviews with staff or documentation relevant for the performance of this contract in case we decide to audit this contract?		If no, please explain why not, including your main challenges. Please note that an on-site audit will only be conducted if such a need has been identified.			

5.10	Is your company able to provide us (or a 3rd party on our behalf) access to your 1st tier suppliers' premises, interviews with staff or documentation relevant for the performance of this contract in case we decide to audit this contract?		If no, please explain why not, including your main challenges. Please note that an on-site audit will only be conducted if such a need has been identified.			
5.11	Have you assessed if your key suppliers in the 1st. tier used for the performance of this contract have a mechanism for receiving complaints for non-compliance with the principles and conditions related to human rights, labor rights, environmental regulations, and anti-corruption that is relevant for the performance of this contract?		If yes, please explain what you have observed about their system and if you have had a dialogue with the supplier about their system. If no, please explain why not, including your main challenges, and if you are considering assessing your key suppliers' complaint mechanism.			

6. DEVIATION MANAGEMENT

QUESTION	DEVIATION MANAGEMENT – OWN OPERATIONS	ENTER ANSWER	COMMENTS	ELABORATE	EVALUATION	FOLLOW UP ACTIONS
6.1	Have any non-compliances been detected in your own operations relevant for the performance of this contract(s) during the last 3 years?		If yes, please describe the nature of the non-compliance(s) and how these have been managed. If no, please explain why you believe no non-compliances have been detected with reference to questions in section 4 and 5 and explain any challenges you may face in this regard.			
6.2	Does your company have a written procedure by which it ensures immediate action to mitigate deviations from this contract clauses within your own operations?		If yes, please describe the procedure for how you will react in case you find a non-compliance within your own operations in the performance of the contract. If no, please describe why not, including your main challenges. If in process, please elaborate.			
QUESTION	DEVIATION MANAGEMENT – SUPPLY CHAIN	ENTER ANSWER	COMMENTS	ELABORATE	EVALUATION	FOLLOW UP ACTIONS
6.3	Does your company have a written procedure by which it ensures immediate action to mitigate deviations from this contract clauses in the supply chain?		If, yes please explain the procedure for how you will react in case you find a non-compliance within the supply chain relevant for the performance of this contract. If no, please describe why not, including your main challenges. If in process, please elaborate.			
6.4	Does your company have an escalation process for informing your customers (e.g. county council/region/municipality/other) about incidents of non-compliances with the principles and conditions related to human rights, labor rights, environmental regulations, and anti-corruption that is relevant for the performance of this contract?		The process does not have to be a formalized or written. If yes, please inform us of your process, including information on which deviations/non-compliance that would generate such a process. If no, please explain if such a procedure is being set up or how we can otherwise be informed in such instances.			
6.5	Have you considered how you can use or increase your leverage in relation to your business relations in the supply chain relevant for the performance of this contract?		If yes, please explain your approach. If no, please explain why not, including your main challenges.			