

Interactions with Signatories Policy

1. Purpose

The purpose of this policy is to help members of the Energy Charter Independent Accountability Panel (the Panel) to effectively remain independent and impartial in their dealings with the Energy Charter Signatories.

2. Objective

The Panel aims to ensure that members are aware of their obligation to treat every Signatory fairly and equitably.

3. Scope

This policy applies to the Chair, members of the Panel and the Panel expert.

4. Policy

This policy has been developed to maintain the independence of the Panel in circumstances where Panel members will have interactions with Signatories outside their role on the Panel.

The Panel recognises that members may consult to or be employed by organisations that will involve interactions with the Energy Charter Signatories.

The Panel will maintain its independence by treating every Signatory fairly and equitably by:

- ensuring that information provided to one Signatory about the Panel's expectations for Signatory disclosures and the Panel's annual evaluation report is provided by the Panel to all Signatories by publishing guidance documents on the Panel's website;
- conducting a transparent public consultation process; and
- offering Signatory CEOs the same opportunities to meet with the Panel to discuss annual disclosures, the Panel's report and its recommendations for improvement.

The Panel will manage interactions with Signatories by requiring members to:

- disclose and update the Panel about any substantial individual engagement with a Signatory relevant to the deliberations of the Panel;
- refuse to receive any draft documentation from any Signatory relating to its disclosures to the Panel. This includes material relating to inputs to the disclosure statement and the draft disclosure statement itself;
- refuse to discuss any aspects of a Signatory's draft disclosure statement either verbally or via email;

- excuse themselves from any discussion relating to the Energy Charter disclosures including at formal customer council meetings or the End User Consultative Group;
- take sufficient steps to advise all staff to comply with this policy; and
- communicate this policy to the relevant Signatories themselves so as to avoid the unintentional provision of information relating to their disclosure statement.

4.1 Responsibility of the Panel

The Chair is responsible for:

- monitoring compliance with this policy; and
- reviewing this policy periodically to ensure that the policy is operating effectively.

The Chair must ensure that members are aware of this policy.

4.2 Identification and disclosure of Signatory interactions

Once any substantial individual engagement with a Signatory relevant to the deliberations of the Panel or breach of this Policy is disclosed, it must be entered into the Panel's register of Signatory interactions, as well as being raised with the Panel.

The Host must maintain the register of Signatory interactions. The register must record information related to the engagement or interaction in breach of this Policy and any steps taken in relation to that interaction or breach.

Agreed by the Energy Charter Independent Accountability Panel

Wendy Craik Chair

Cassandra Goldie

Andrew Richards

Phil Weickhardt

Date 18 September 2019