



Oulun Energia Group's Supplier Code of Conduct

January 13, 2025

Introduction

Responsibility is an integral part of Oulun Energia Group's corporate culture. Oulun Energia Group's ethical requirements define the minimum requirements for the operations of the board, management, and personnel. We also require our suppliers (hereinafter referred to as the "Supplier") to comply with our ethical requirements when conducting business with a subsidiary of Oulun Energia Group.

The Supplier Code of Conduct (hereinafter the "Code of Conduct") defines the principles of corporate ethics that Oulun Energia Group requires commitment to and compliance with from its Supplier. This Code of Conduct is an integral part of all contracts between the Supplier and the subsidiary of Oulun Energia Group.

The Code of Conduct applies to all companies that supply products or services to a subsidiary of Oulun Energia Group. The Supplier must ensure that in its own operations, its own suppliers and subcontractors also comply with a code that is at least equivalent to this Code of Conduct.

Management systems

The Supplier must have appropriate management systems in place to ensure compliance with current applicable laws and regulations and the Code of Conduct.

Compliance with local law

The Supplier must comply with current applicable laws and rules and regulations in all its operations and in all circumstances. The Code of Conduct outlines the minimum requirements that the Supplier must comply with even if the requirements of the Code of Conduct are stricter than local laws.

The Supplier must act in accordance with the code provided by the subsidiary of Oulun Energia Group at a given time concerning supply or a service.

The Supplier must ensure that all its obligations and commitments to Oulun Energia Group and its subsidiary are implemented in a manner that does not conflict with the laws or rules and regulations that apply to the Supplier, Oulun Energia Group's subsidiary, or any contracts between them.

Human rights and labour rights

The Supplier must respect human rights and the principles of non-discrimination in all its activities.

The Supplier is aware of the principles of human rights and non-discrimination as defined in the UN Universal Declaration of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and the Ten Principles outlined in UN's Global Compact Strategy.

The Supplier must treat its employees, employees of its business partners, and members of other stakeholders fairly and equally, regardless of their age, origin, gender, nationality, language, religion, beliefs, opinions, political activity, trade union activity, family relationships, health status, disability, sexual orientation, or other personal reasons.

The Supplier shall not use child labour or any form of forced labour in any of its operations.

Environment

The Supplier must operate in accordance with the principles of sustainable development and avoid or minimise any adverse effects on the environment.

The Supplier must comply with environmental permits and environmental legislation. The Supplier must deal systematically with any observed environmental damage and violations. If the impact can extend or extends to Oulun Energia Group, the Supplier must also notify the subsidiary of Oulun Energia Group with which the Supplier has a contract.

The Supplier must ensure that its employees have sufficient knowledge and experience to attend to all its environmental responsibilities and obligations. The Supplier must also ensure that it has sufficient financial and human resources and the knowledge to meet its environmental obligations as set out in the Code of Conduct.

Safety

Each employee has the right to work without compromising their health. Our goal is to remain at 100% for occupational safety every day. The Supplier must ensure the safety and safe working conditions of its employees.

The Supplier must comply with all statutory occupational health and safety regulations.

The Supplier must ensure that the measures to promote occupational health and safety are up-to-date, sufficient, and that the culture of safety is constantly developed.

Responsible business conduct

The Supplier must act ethically and responsibly. The Supplier commits to comply with competition legislation in all its operations.

The Supplier or its employees shall not give or accept any direct or indirect bribes or other benefits that may be considered corrupt.

The Supplier shall not offer, give, or accept bribes or other similar benefits intended to influence business decisions or gain preferential treatment that may be considered excessive in context or that may otherwise seem inappropriate.

The Supplier must avoid situations in which the interests of the Supplier conflict with those of Oulun Energia Group. The Supplier must ensure that it has adequate means of recognition and other policies for potential conflicts of interest.

The Supplier commits to fighting the shadow economy and preventing money laundering and terrorist financing. The Supplier commits to suspending dealings with a person, group, or society subject to economic sanctions or domestic freezing orders.

If the delivery includes the supply of goods, the Supplier assures that the goods under the contract or the materials, raw materials, or components used in the manufacture of the goods under the contract have not been procured or imported directly or indirectly from Russia, Belarus, or the regions of Donetsk, Luhansk, or Crimea.

The Supplier must protect confidential information and use it only for relevant business purposes.

General requirements

The Supplier must have a process in place to ensure compliance with the Code of Conduct. The Supplier is responsible for ensuring and monitoring that its suppliers and subcontractors comply with the Code of Conduct.

The Supplier must immediately notify Oulun Energia Group of any action that is in violation of this Code of Conduct. Observations can be sent confidentially to:

<http://ins.li/oulunenergiawhistleblow>

The information given on the reporting channel will be handled confidentially according to the Finnish data protection law.

The Supplier commits to provide information on matters concerning the Code of Conduct at the request of the subsidiary of Oulun Energia Group.

The subsidiary of Oulun Energia Group has the right to ensure compliance with this Code of Conduct by conducting an audit (hereinafter 'Auditing') of the supplier's operations. The Supplier authorises the subsidiary of Oulun Energia Group or a third party designated by the subsidiary of Oulun Energia Group to conduct the Auditing and to perform the audit in the presence of the Supplier in matters related to this Code of Conduct. The Auditing can focus on, for example, the Supplier's records, accounts, and premises.

The Supplier must be notified of the Auditing no less than four (4) weeks in advance.

Consequences of violating the Code of Conduct

If the Auditing reveals or it is otherwise revealed that the Supplier is in violation of the Code of Conduct, Oulun Energia Group will provide the Supplier instructions for corrective actions to take. The Supplier must take corrective action immediately.

If the Supplier has fundamentally violated the Code of Conduct, the subsidiary of Oulun Energia Group has the right to cancel its orders, suspend future orders, and terminate or dissolve its contract with the Supplier.

If the contract that the Code of Conduct is attached to contains stipulations on termination of the contract, the parties note that the violation of this Code of Conduct is considered a material breach of contract that entitles the subsidiary of Oulun Energia Group to terminate the contract with the Supplier.