

Vaasan Sähkö Group

Vaasan Sähkö Group sells electricity across mainland Finland. We are responsible for the distribution of electricity and district heating, and for providing related services to residents and businesses in the area. We source energy from the Nordic countries. New investments within our basic production are directed towards renewable energy. Our district heating energy is modern, local energy. Our goal is a carbon-neutral basic production.

Vaasan Sähkö Group has an important social role in the production, distribution and sale of energy. We are committed to sustainable, responsible and ethical practices and their development throughout the value chain. Every employee in Vaasan Sähkö Group is bound by our shared group values and policies.

We are committed to meeting relevant requirements, to improving our operations continuously, to complying with applicable laws, regulations and guidelines, and to reducing all types of hazards.

This Code of Conduct has been developed in accordance with the UN Global Compact and the principles that guide business operations and human rights, including the UN Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Supplier

Definition of Supplier: a supplier, partner, subcontractor or other similar entity or third party that provides Vaasan Sähkö Group or an individual Group company with materials, goods, products or services or that, through its own activities, provides products or services on behalf of Vaasan Sähkö Group or an individual Group company. This definition covers suppliers, partners and subcontractors who have a direct contractual relationship with Vaasan Sähkö Group, as well as suppliers and subcontractors of these parties.

The Supplier must be appropriately established, be an existing legal entity in accordance with applicable law and have the right to conduct business.

Supplier requirements:

- In its relations with Vaasan Sähkö Group, the Supplier shall comply with applicable legislation and regulations and the requirements of this Code of Conduct or similar, separately agreed responsibility requirements. The Supplier must demonstrate its commitment and ability to comply with the requirements of this Code of Conduct and applicable laws, rules and regulations.
- The Supplier shall maintain transparent and sufficient documentation to demonstrate the Supplier's compliance with the requirements of this Code of Conduct and all applicable laws and regulations. These can be expressed through ISO standards, policies and guidelines, for example. In addition, the Supplier shall, where appropriate, demonstrate effective risk management, orientation and training and adequate resources in proportion to the scope and quality of the Supplier's business to Vaasan Sähkö Group.



- The Supplier is obliged to provide Vaasan Sähkö Group with information on its economic, good governance, human and environmental impacts and other sustainability impacts, as well as on its compliance with the relevant regulations.
- When informing the media about matters related to Vaasan Sähkö Group, the Supplier shall agree in advance with Vaasan Sähkö Group on the content. If the media contacts the Supplier on a matter related to Vaasan Sähkö Group, the Supplier shall immediately inform Vaasan Sähkö Group. We also expect Suppliers to behave responsibly on social media and other communication channels. We encourage Suppliers to commit to the Code of Ethics for Professional Communicators by the Council of Ethics for Communication (VEN). For media-related questions, please contact viestinta@vaasansahko.fi.

Supplier's responsible business conduct:

- In all its activities, the Supplier shall prevent and eliminate risks of misconduct, hazards and other practices contrary to good business practice. The Supplier must, considering its own legitimate business interests, avoid conflicts of interest and declare all existing conflicts of interest, situations where there is a possibility of a conflict of interest and any circumstances on the based on which conflict of interest may be considered to affect the Supplier's cooperation with Vaasan Sähkö Group. The Supplier shall inform Vaasan Sähkö Group of any situation in which a conflict of interest arises or could arise.
- The Supplier shall maintain appropriate procedures to prevent corruption, extortion and bribery (zero tolerance) and to comply with applicable international sanctions programs.
- The Supplier must refuse money laundering in all its forms. The Supplier must have appropriate policies and processes in place to detect and prevent money laundering, as required by money laundering legislation and efforts against grey economy.
- The Supplier shall ensure and monitor that its or its suppliers' management or administrative body members or other persons exercising control are not in business prohibition registers or on sanctions lists (e.g. EU or UN) and that the Supplier is aware of the sanctions regulations and does not do business with persons subject to such regulations.
- The Supplier must undertake to compete honestly, fairly, ethically and in accordance with applicable competition legislation.
- The Supplier shall ensure the confidentiality of business-related confidential information and comply with applicable data security and data protection legislation and other relevant regulations. The Supplier must process personal data confidentially and in compliance with the



applicable personal data protection legislation and the requirements of the Electricity Market Act. The Supplier shall respect the intellectual property rights of Vaasan Sähkö Group and others.

- The Supplier shall maintain accurate, up-to-date and correct financial and other information about its business in the relevant government registers and shall properly fulfil its tax, payment and other obligations in relation to its business, including obligations to its suppliers.
- The Supplier must be registered in the trade register, preliminary tax withholding register, employer register and VAT register. The Supplier must pay taxes and statutory pension insurance contributions. In addition, the Supplier must ensure that it uses the applicable collective agreements or principal terms of employment. The Supplier shall offer occupational health care.
- The Supplier must comply with all rules and regulations concerning product safety and the protection, use, safety and quality requirements relating to e.g. machinery, equipment, products, services and chemicals.
- The Supplier shall aspire to prevent accidents at work and take care of its employees.
- The Supplier must respect all internationally recognized human rights. The Supplier shall have procedures in place to prevent adverse effects on people, the environment and society. The Supplier must comprehensively identify and monitor human rights risks related to its own activities and take immediate corrective action if potential human rights violations occur.
- The Supplier must identify and prevent all forms of physical, psychological, verbal and sexual harassment and abuse of employees.
- The Supplier must identify and prevent human rights risks in its operations, and observe the following:
 - Child labour, forced labour, trafficking and discrimination are prohibited
 - The employee has freedom of association and collective bargaining
 - Work safety and health must be considered
 - The terms and conditions of employment contracts must comply with the law
 - Salaries must align with national legislation and cover the basic needs of the employees.
- The Supplier must provide equal opportunities for all its employees and treat everyone equally, regardless of ethnic origin, gender, disability, sexual orientation, religion, political opinions or other characteristics.



- The Supplier shall use resources efficiently and have adequate procedures in place to minimize the negative environmental impact of its activities. Depending on the sector, areas to be considered include emissions and energy use, water use and wastewater, raw materials, pollution, storage and handling of chemicals, hazardous substances and waste.
- The Supplier shall actively seek to identify and prevent environmental damage arising from its business activities and ensure appropriate preparedness by adopting appropriate preventive and corrective measures, systematically deal with environmental violations and complaints and inform all parties concerned, including Vaasan Sähkö Group.
- Any above mentioned alleged environmental, human rights or good governance violations with effects extending to Vaasan Sähkö Group shall be reported to Vaasan Sähkö Group's contact person responsible for the contract.

Monitoring and sanctions:

Upon request, the Supplier shall provide Vaasan Sähkö Group with information on compliance with this Code of Conduct. Vaasan Sähkö Group may carry out audits verifying the compliance with this Code of Conduct, either by itself or with the assistance of a third party. Any audits will be carried out in cooperation with the Supplier so that they do not unnecessarily disrupt the Supplier's business or prevent the Supplier from fulfilling its legal or contractual obligations. The Supplier shall assist Vaasan Sähkö Group or its appointed third party in carrying out the audit in a reasonable manner, including by allowing on-site inspections and providing the requested information in a timely manner.

If the Supplier discovers that any of its partners violates this Code of Conduct in relation to the services or goods supplied to Vaasan Sähkö Group, it must immediately notify Vaasan Sähkö Group's contact person responsible for the contract.

If the Supplier is found to have breached this Code of Conduct, the Supplier shall be obliged to remedy the breach within a period to be agreed with Vaasan Sähkö Group, but no later than six months. If the Supplier fails to remedy the breach within the agreed time or to provide an adequate explanation of its measures to remedy the breach, Vaasan Sähkö Group shall be entitled to cancel its order, suspend the ongoing work or ongoing or future deliveries and/or terminate the main contract to which this Code of Conduct is attached.

The breach may also lead to the Supplier not being selected in future tenders.

To ensure the accountability of its practices, Vaasan Sähkö Group has a confidential and independent whistleblowing channel, which can be found on the Vaasan Sähkö Group website: vaasansahko.fi/en/whistleblowing-channel-for-suspected-misconduct. We recommend that all our partners join Vastuu Group's Reliable Partner program (vastuugroup.fi), which will manage and update the legally required documents on your behalf.

Information can be sent to: ostoreskontra@vaasansahko.fi.

