

Elenia's Human Rights Policy

Our mission

Electrifying life

Our vision

Responsible reformer of energy services and markets

Our values

Responsibility for the future | Close to the customer
Open and reliable cooperation | The courage to renew

Our strategic objectives are to earn our customers' trust, operate efficiently, renew the energy markets and services, enable the green transition, mitigate climate change and advance carbon neutrality. Our Code of Conduct and management system promote responsibility and sustainable development in everything we do.

Scope of application

The Human Rights Policy applies to Elenia Group's companies and personnel. It also applies to Elenia's partners, subcontractors and other stakeholders operating in Elenia's value chain. We expect Elenia's employees and partners whose activities may have a direct impact on Elenia's operations, products and services to respect human rights and undertake not to violate them.

Elenia's commitments

Elenia is committed to respecting and promoting human rights with regard to both its personnel and stakeholders. Our operations are based on internationally recognised human rights, and we also expect the same from our partners. Elenia is committed to the UN Global Compact initiative and promotes selected UN Sustainable Development Goals (SDGs) in its operations.

Our operations are guided by the following international principles and guidelines, among others:

- Organisation for Economic Co-operation and Development (OECD), Guidelines for Multinational Enterprises
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights
- The principles of the UN Global Compact initiative
- UN Universal Declaration of Human Rights

Human rights policies

In addition to the Human Rights Policy, consideration of human rights in practice is supported by Elenia's Sustainability Policy, Human Resources Policy, Data Protection Policy, Occupational Health and Safety Policy, Procurement Policy and Whistleblowing Policy. In addition, Elenia's internal procedures, such as the anti-bribery and corruption guidelines, the internal procedure for harassment and other inappropriate treatment and the internal equality and non-discrimination plan, support compliance with human rights principles.

The key human rights principles for the Group's personnel and partners are described in the following documents:

- Elenia's Code of Conduct for Personnel
- Elenia's Code of Conduct for Partners

With these guidelines and policies, we ensure that human rights are respected and promoted as part of our day-to-day operations.

Elenia's human rights principles

Employees' rights

Elenia is committed to respecting the human and labour rights of all of its employees and partners. We ensure employees' freedom of speech and their right to have an opinion. We comply with local labour laws and collective agreements and promote freedom of association. We offer safe and healthy working conditions, reasonable working hours, pay and benefits. Pay is transparent taking into account privacy protection, fair and based on job requirements and local regulations.

A safe and healthy working environment

Ensuring a safe and healthy working environment is a key aspect of Elenia's operations. Based on Elenia's risk management process, we have identified that the most significant human rights impacts and risks are related to the safety of our partners' and sub-contractors' employees in our work. Safety risks are assessed daily in our work by both Elenia employees and our partners in accordance with the Occupational Health and Safety Policy. Our employees and partners make safety observations. We investigate and report safety incidents together with our partners and openly share lessons learned to prevent accidents. We also ensure the safety of our employees and partners through training, safety measures and inspections.

Diversity, equity and inclusion

Promoting diversity, equity and inclusion is a key part of our operations. Elenia does not tolerate harassment, discrimination or inappropriate behaviour in any form. We require that every employee is committed to treating all members of the work community equally, without discrimination and with respect for international human rights, the fundamental principles of working life and Elenia's Code of Conduct. We ensure the realisation of human rights, non-discrimination and equality in recruitment through practices that promote equality at all stages of the recruitment process. We ensure the equal treatment of our customers, partners and other stakeholders.

Protection of personal data

Elenia is committed to respecting everyone's right to the protection of personal data. The fundamental rights to the protection of personal data are protected by the EU Charter of Fundamental Rights and the European Convention on Human Rights, among others, and they are laid down both in EU legislation and at national level. Elenia has defined processes for managing personal data, ensuring the confidentiality, availability and integrity of personal data and reporting and investigating information security incidents concerning personal data in accordance with data protection legislation.

Human rights in supply chain

Elenia's procurements consist of contracting, material, ICT and indirect procurement. Elenia requires its partners to comply with laws, agreements and terms of employment and to commit to Elenia's Code of Conduct for Partners. Elenia's significant agreements include a commitment to the Code of Conduct. The partner will ensure that ethical and human rights practices are upheld and monitored within its own organisation and throughout its supply chain to the best of its ability and resources. Partners are liable for the operations of their own subcontractors. Elenia values long-term partnerships in network construction, and the partners' personnel are regularly trained in quality, safety, environment, sustainability and human rights themes.

We assess the human rights impacts and risks of our partners and supply chains, for example, through our partners' sustainability audits. Elenia may request relevant information from its partners in order to ensure compliance with the Code of Conduct and human rights. Elenia can audit the partner's operations to demonstrate the implementation of the agreed terms and corrective measures.

Elenia does not accept forced labour, debt slavery or other forms of modern slavery in its own operations or supply chain under any circumstances. If we suspect that a supplier is using forced or slave labour, we will take immediate corrective actions. Elenia does not tolerate any form of human trafficking or the use of child labour. If child labour is observed, we undertake to act in the best interests of the child.

Objectives, leadership and responsibilities

The Human Rights Policy states Elenia's commitment to respecting human rights, complying with human rights principles and implementing the related good governance and due diligence. Elenia aims to increase awareness and competence and provide regular training to employees and partners on human rights and the Code of Conduct. We also undertake to cooperate with partners through dialogue, audits, assessments and corrective action plans to minimise human rights violations.

Elenia's management is responsible for monitoring the implementation of human rights work and due diligence in operational management and business processes. Elenia's Board of Directors approves the Human Rights Policy and the Human Rights Commitment. The Board Audit Committee monitors the implementation of the due diligence process and is responsible for internal audit, which is used to assess and develop the effectiveness of the process.

Oversight, monitoring and proactive approach

The identification, assessment, prevention, corrective measures and communication of adverse human rights impacts form Elenia's human rights due diligence process. In accordance with the UN Guiding Principles on Business and Human Rights, Elenia is committed to taking human rights due diligence into account in its decision-making processes.



Elenia's due diligence framework

Elenia actively seeks to avoid negative human rights impacts and minimise potential impacts in its own operations and value chain. We take human rights risks into account in Elenia's risk management, the objectives and principles of which are described in Elenia's Risk Management Policy. Adverse human rights impacts and risks are prioritised on the basis of their severity and likelihood. If adverse human rights impacts are caused by our operations or occur in our supply chain, we initiate an investigation, agree on the corrective measures and monitor their implementation. We report regularly and transparently on our human rights work and monitor and assess the suitability, adequacy and effectiveness of our due diligence process.

Elenia has a whistleblowing channel through which Elenia's employees and stakeholders can anonymously report concerns, suspicions or violations related to operations that violate Elenia's Code of Conduct and human rights. We are committed to ensuring that the whistleblowing channel is fair, easily accessible and transparent. All reports are investigated and handled promptly and appropriately.

The Human Rights Policy will be reviewed at least once a year and updated as necessary. This document is public and available at www.elenia.fi.

Elenia is Finland's second-largest distribution system operator and the largest customer service provider in the energy sector in Finland. We see to the maintenance and renewal of the electricity network, build electricity networks and connections together with our partner companies, measure our customers' electricity consumption and forward energy data to electricity suppliers. Our service business provides customer service as well as diverse services related to the electricity market for the energy sector and other infrastructure companies.