

Elenia's Code of Conduct for Partners

1. Introduction

Elenia's operational group consists of Elenia Oy and its wholly-owned subsidiary Elenia Verkko Oy ("**Elenia**"). This Elenia Code of Conduct for Partners ("**Code of Conduct**") is a set of principles that describe Elenia's expectations for responsible business practices. It applies to all of Elenia's partners, including suppliers of products and services and other partners ("**partner**").

All of Elenia's partners are required to comply with this Code of Conduct or their own Code of Conduct of at least the same level in terms of content and scope. The Code of Conduct is incorporated into all of Elenia's significant written agreements with partners.

Our Code of Conduct and sustainability are based on legislation and international requirements and conventions, including the UN Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Convention against Corruption, the UN Rio Declaration on Environment and Development, and the UN Sustainable Development Goals (SDGs). We are committed to the ten principles of the UN Global Compact initiative that formulate these agreements in the business world.

Elenia's task in society is to secure a smooth daily life, which requires responsibility and reliability from us and our partners. We require that our partners comply with the applicable legislation and this Code of Conduct, or corresponding principles, in their operations. In addition, Elenia encourages its partners to commit to identifying the direct and indirect sustainability impacts of their operations and to strive to prevent and mitigate adverse impacts in accordance with the principle of continuous improvement.

2. Compliance with the Code of Conduct

The Code of Conduct for Partners is an integral part of agreements between Elenia and its partner. The partner undertakes to comply with this Code of Conduct and shall ensure that it operates, and monitors its activities, in accordance with this Code of Conduct within its own organisation and throughout its supply chain. The partner shall ensure that their own suppliers and business partners, i.e. Elenia's sub-contractors and other entities in Elenia's value chain, comply with the requirements of the Code of Conduct. The partner undertakes to engage in regular training and monitoring to ensure the fulfilment of these obligations.

Elenia has the right to audit or investigate the partner's relevant information or operating locations on topics covered by the Code of Conduct to ensure compliance with the Code of Conduct in the partner's operations and supply chain. The audit may be carried out by Elenia or by an independently qualified third party. Elenia is liable for the costs directly caused by the audit and the partner commits to participating in the audit at its own expense.

If, as a result of the audit or other findings, Elenia has reason to believe that the partner has not complied with this Code of Conduct, Elenia has the right to obligate the partner to remedy the deficiencies. If the partner fails to take remedial action, Elenia has the right to take remedial action or terminate the contract. If the partner finds that they do not meet the requirements of the Code of Conduct, they must immediately take appropriate corrective action and report to Elenia on the deficiencies, violations and their rectification. The partner is responsible for ensuring the implementation of adequate measures.

The partner is responsible for operating in accordance with this Code of Conduct and for reporting suspected violations of the law, unethical conduct or non-compliance with this Code of Conduct without delay to Elenia's contact person or via the [whistleblowing](#) channel on Elenia's website. The partner shall

ensure that persons who report suspected violations and misconduct are not subject to retaliation. The partner understands that Elenia considers violations of legislation, non-compliance with this Code of Conduct or failure to remedy deficiencies to be a breach of contract that may entitle Elenia to terminate the contractual relationship with the partner.

In the event of a conflict between local legislation and this Code of Conduct, the partner shall comply with the stricter requirement, unless otherwise prohibited by law.

3. Responsible business conduct

Elenia's partner is committed to ensuring that the partner's employees are familiar with the requirements arising from legislation and other regulations that they must take into account in their work. The partner undertakes to provide its personnel with a means of seeking advice if there is any uncertainty about the requirements arising from legislation or other regulations that affect their work.

We obligate the partner to meet the requirements and competence requirements by measures such as monitoring legislation, the provision of comprehensive orientation and regular training. In Elenia's partnerships, everyone understands that non-compliance with laws and regulations can have serious consequences for Elenia, both legally and in terms of reputation. We expect our partner to be aware of the risks associated with their activities and to have implemented appropriate procedures to minimise the risks.

3.1 Fair competition

We do not condone unlawful acts that contravene competition law. The partner commits to not engaging in anticompetitive behaviour, such as conducting anticompetitive discussions and concluding agreements, as well as to refraining from cooperation with any parties that engage in such behaviour. Such practices include, for example, illicit price fixing, bid rigging, market or customer allocation schemes, abuse of market power and other illegal restrictive practices at any level of the value chain.

3.2 Prevention of corruption, bribery, money laundering and the grey economy, and sanctions compliance

By incorporating this Code of Conduct into the agreement, the partner undertakes to:

- (a) comply with all applicable anti-corruption and anti-money laundering legislation (collectively referred to as "**Anti-Bribery Legislation**");
- (b) comply with appropriately prepared anti-bribery policies ("**Policies**");
- (c) ensure, by means of adequate written instructions, contractual obligations and control measures, that the partner itself and its employees and management, its group companies, contractual partners and their employees and management, and intermediaries and other parties acting on behalf of the partner comply with Anti-Bribery Legislation and Policies;
- (d) notify Elenia without delay if it is suspected that the partner or other parties mentioned in item (c) above have violated Anti-Bribery Legislation or Policies ("**Violation**"), and
- (e) compensate Elenia for any damage caused by the Violation.

Elenia has the right to (a) terminate all valid agreements with the partner with immediate effect due to the Violation, and (b) suspend payments based on agreements to the partner due to the suspected Violation.

Hospitality offered to Elenia's employees or stakeholders must be reasonable and generally acceptable. Prohibited benefits that exceed customary hospitality may include, but are not limited to, monetary gifts, physical goods or recreational trips. In unclear situations, the partner shall check with Elenia's contact person whether the benefit can be offered.

We do not tolerate the grey economy, corruption, fraud, coercion, collusive practices, obstruction of investigation, money laundering, or terrorist financing. The partner undertakes to only conduct business with reputable parties that conduct legitimate business and whose funds originate from legitimate sources. Elenia's partners are required to comply with all applicable sanctions and export control laws and regulations. This includes, in addition to local regulations, international sanctions and export control regulations imposed by the United Nations, the EU, the United States and the UK. Partners must not, at any stage, engage in any business transactions or activities that are restricted or prohibited by sanctions and export control regulations.

3.3 Confidentiality and personal data protection

The partner shall respect confidentiality and personal data protection. All personal data collected, received, used, transferred or stored must be treated as strictly confidential and must not be disclosed to third parties, unless otherwise agreed upon or provided by law. The processing of data must be transparent to the persons concerned and personal data may only be used for the purposes the data subjects have been informed of. Responsible data management also requires comprehensive safeguards.

4. Human rights and social responsibility

Elenia requires that its partners respect human rights in all of their operations and as part of their business relationships and supply chain. The partner shall respect internationally recognised human and labour rights as defined in the UN Universal Declaration of Human Rights and the International Labour Organisation's (ILO) Conventions on Fundamental Rights at Work in all its operations and as part of its business relationships and supply chain. In its business operations, the partner must take into account the UN Guiding Principles on Business and Human Rights and observe due diligence. The partner shall commit to implementing effective and appropriate preventive, mitigating and remedial measures in the event of adverse human rights or labour rights impacts related to its business activities.

4.1 Occupational health and safety

The partner must provide their employees with a safe and healthy working environment. As far as the working environment is concerned, the partner must comply with applicable laws, rules and regulations in the countries where the partner operates. All partners involved in Elenia's activities must have the necessary knowledge, understanding and ability to implement safe and healthy work practices. The partner must ensure this through, for example, hazard identification, competence requirements, comprehensive orientation and regular training.

It is the responsibility of all Elenia employees or those working for Elenia to actively prevent health and safety risks in their working environment. In addition to highly competent and professional employees, our safety work is based on safe equipment, processes and operating models, visible and effective safety management as well as careful work planning and implementation. We always require appropriate protective equipment from our partners on construction sites, and they must be available to employees free of charge.

The partner shall monitor and keep records of their occupational health and safety level and occupational hazards. Elenia encourages partners to report publicly on the level of occupational health and safety, relevant observations and other significant indicators. When our partner observes an accident, incident, near miss or other harmful conduct, we will take the necessary measures. Each partner has the duty to report such occurrences to Elenia according to an agreed process so that we can manage, investigate and mitigate their impacts and learn from the incident.

4.2 Diversity, equity and inclusion

In its human rights commitment, Elenia has made a commitment to promoting diversity, equity and inclusion in all of its activities. We do not condone discrimination, disrespect, bullying or harassment of any kind. We also require our partners to act in accordance with these principles and promote gender pay equality, among other things. We expect our partners are aware and take into account the rights of potentially vulnerable groups, such as migrant workers, women, children and people with disabilities as well as indigenous peoples and local communities.

Our partners shall not use, tolerate or be subjected to any form of humiliation or physical punishment. The partner must provide decent working conditions and provide workers with amenities such as drinking water, clean toilets, adequate ventilation, appropriate lighting and rest facilities. The partner shall not discriminate in any way in connection with recruitment or employment. Illegal discrimination is based on factors such as age, gender, religion, sexual orientation, nationality, pregnancy, disability, illness, trade union activity or membership, political activity or any other circumstance that may give rise to discrimination.

The partner is expected to share information about their organisation's performance, operations and strategy within the organisation and to promote communication between management and employees. The partner is expected to involve staff in the development of their organisation by promoting employee opportunities for influence and taking into account employee initiatives.

The partner must respect the right of workers to freely form, join or not join trade unions and to consult collectively. In situations where the right to freedom of association and collective bargaining can be restricted by law, the partner must allow alternative forms of employee representation, association and negotiation.

4.3 Terms of employment and a living wage

Our partner must ensure that their employees understand the terms and conditions of their employment before the start of employment. All employees must be provided with a written employment contract in a language they understand, which defines the basic working conditions, such as working hours, overtime pay, job description, notice period, amount of salary and payment interval. The partner must apply working time that is in accordance with applicable laws and collective agreements and keep records of the working time of their employees.

The salaries and social benefits paid by the partner must meet at least the minimum requirements of the applicable legislation, collective agreements or the industry, whichever is the highest. We urge our partners to be aware of what the living wage is and to pay their employees at least that amount. This refers to the salary being sufficient to cover the cost of living. The partner must not use salary reduction as a punishment. Partners' employees are free to leave after a reasonable period of notice in accordance with the applicable law or employment contract.

4.4 Prohibition of forced labour and child labour

The partner shall not use or condone forced labour or child labour in any form. The health, safety, development and education of employees under the age of 18 must be protected so that they are not endangered. The partner must be able to ascertain the age and identity of all persons they employ. Partners may not retain their employees' passports or other documents. The partner shall also ensure that their employees are not required to pay recruitment fees when using recruitment companies, for example.

5. Environment and climate

Elenia's aim is to continuously reduce harmful environmental impacts together with the partner network. We require our partners to comply with the minimum requirements stipulated by environmental legislation and other applicable laws, regulations and standards. Elenia's partners must work to combat climate change, promote sustainability and operate in an environmentally responsible and preventive manner.

The partner shall identify the key environmental aspects of its operations and their environmental impact throughout the life cycle of the products and regularly evaluate their significance as well as the required measures. Elenia requires that its partners use resources such as energy, water and raw materials efficiently and sustainably. We also require that our partners generate as little waste as possible and strive for increasingly high reuse and recycling rates in all of their operations.

Elenia's partners must adhere to the precautionary principle in their actions affecting the environment. Partners must actively develop policies that promote the sustainable use of natural resources and foster the development and deployment of environmentally friendly technologies in accordance with the UN Global Compact. Partners must handle hazardous substances responsibly and seek to minimise their use in their operations. If we observe environmental damage or harmful practices, Elenia works together with its partners without delay to remedy the damage or harmful practice.

In addition, partners must promote the following key environmental aspects of business operations to the extent that they are material to the partner's operations:

- energy consumption and climate change
- sustainable construction and land use
- efficient use of materials and the circular economy
- sustainable procurement and supply chains
- due diligence
- environmental deviations