

Sustainability requirements for the suppliers of Gasgrid Finland Oy and its group companies

Gasgrid aims to be a trustworthy business partner and always carries out its business operations with integrity under any circumstances and in line with ethical standards as stated in Gasgrid's Code of Conduct. Gasgrid's commitment to sustainable and ethical business depends not only on Gasgrid's own personnel but also upon business partners who share Gasgrid's commitments.

The purpose of the Gasgrid Supplier Code of Conduct (later "**Code**") is to define the sustainability requirements for Gasgrid's suppliers (later "**Suppliers**"). In this context, Suppliers mean any legal entity and its 1st tier of suppliers which provide or participate in providing products, components, materials or services to Gasgrid.

This Code is based on the principles of the United Nations Global Compact initiative.

1 Business principles and transparency

Suppliers shall comply with all the applicable laws and regulations applicable to their operations. If this Code contradicts with national laws or regulations, Suppliers shall comply with whichever is more stringent. Suppliers are expected to act in accordance with the highest ethical business standards.

Conflict of interest

Suppliers shall avoid any situation where a conflict of interest between the Supplier and Gasgrid may exist and shall prevent and / or disclose any potential or existing conflict of interest to Gasgrid with undue delay.

Accuracy of information, privacy rules and fair competition

Suppliers agree to safeguard Gasgrid's information and to secure the confidentiality of confidential information. Suppliers agree to handle the personal and other data appropriately, in accordance with applicable laws and regulations together with Gasgrid's guidelines. Suppliers shall issue accurate and relevant financial and other information about their business operations, conduct responsible marketing, and compete in a fair and equal manner in compliance with all applicable antitrust laws and regulations. Suppliers should have standards and procedures in place to prevent their management and employees from engaging in any anti-competitive practices.

Anti-corruption, anti-bribery and anti-money laundering

The highest standards of integrity are to be expected from Gasgrid's Suppliers, including its management, employees and entities acting on its behalf, in all business interactions. Any form (offering, promising, giving, accepting) of extortion, bribery or corruption, including improper payments (such as

facilitation payments or kickbacks) to / from employees or organizations, is prohibited. The Supplier shall comply with all applicable laws and regulations on anti-money laundering and privacy and on all applicable economic and trade sanctions and must have as well as maintain policies and procedures to prevent bribery, corruption and black economy.

Supplier shall not provide Gasgrid representatives with any gift or hospitality in any situation in which it might influence, or appear to influence, a representative's decision in relation to the Supplier.

Trade sanctions

The Supplier must comply with any trade sanctions imposed by the EU, the US, the UK or the UN. The Supplier itself or its beneficiaries must not be subject to same sanctions.

2 Human rights

Gasgrid respects human rights in all its activities and requires the same from its Supplier. Gasgrid will in no circumstances accept the use of forced, undeclared or child labour. Gasgrid's Supplier is requested to support and respect internationally proclaimed human rights that are expressed e.g. in the International Bill of Human Rights (the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), and the International Covenant on Economic, Social, and Cultural Rights (ICESCR)), and ensure it is not in any way involved in human rights violations. Suppliers shall identify their human rights impacts, implement mitigation actions when required and provide remedial action in the event of human rights violations.

3 Labour standards

Freedom of association

Gasgrid's Supplier shall recognize and respect employees' freedom of association and their right to freely choose their representatives. Suppliers should also recognize employees' right to collective bargaining. Suppliers shall not discriminate against employees' representatives or members of trade unions or restrict their ability to carry out their representative functions in the workplace.

Forced labour

Gasgrid's Suppliers shall not use forced labour. Employees shall have freedom to leave their employment after reasonable notice as required by national law and / or contract. Employees shall not be required to lodge monetary deposits or identity documents with the employer.

Working hours and wages

Gasgrid's Suppliers shall ensure that all employees are provided with understandable, written employment

contracts setting out their employment conditions. Salary and terms shall be fair, reasonable, and at least comply with the national laws or industry standards, whichever is higher. Working hours shall comply with national laws. Suppliers shall adhere to applicable laws regarding working hours, minimum wages, overtime, sufficient breaks and rest time, sick leave and annual holidays, as well as parental leave and mandatory benefits (e.g. social security), and have appropriate records of these in place.

Child labour and young workers

Gasgrid's Suppliers shall not, in any circumstances, employ children who are below the minimum legal employment age. The Supplier shall follow minimum age set by local laws or International Labor Organization's (ILO) definition of minimum age of 15 years, whichever is higher. Children and young people above the minimum age but under 18 years of age shall not be employed in any hazardous work, or work that jeopardizes their health, safety, or morals. Suppliers are requested to have an established system to ensure fulfilment of and follow-up on these requirements.

Non-discrimination

Gasgrid's Suppliers shall treat their employees and sub-supplier's employees with respect and dignity and provide everyone equal opportunities without any discrimination based on partiality or prejudice. This includes discrimination based on ethnicity, gender, sexual orientation, marital status, pregnancy, parental status, religion, social origin, political opinion, and similar factors. Threats of violence, corporal punishment, physical or verbal abuse, or other unlawful harassment are strictly prohibited.

Health and safety

Gasgrid's Suppliers shall provide their employees with a safe and healthy workplace in compliance with applicable laws and regulations. Suppliers shall ensure that appropriate health and safety information is provided to its employees and sub-Suppliers, and that relevant training and protective equipment is provided. Supplier working for Gasgrid shall comply with Gasgrid's general HSE requirements as applicable. A Supplier shall at least provide its employees and sub-Suppliers during working hours and at the workplace with drinking water, clean toilets, adequate ventilation and thermal conditions, emergency exits, proper lighting, and access to first aid supplies or other provisions for emergency care at the workplace.

Prevention of alcohol and drug use at work

Gasgrid is an alcohol- and drug-free workplace. Suppliers' employees and sub-suppliers are permitted to work at Gasgrid only if they are sober and drug-free. Suppliers shall take precautionary action to prevent alcohol and drug abuse. Gasgrid reserves the right for occasional testing on Suppliers' employees when they are working at Gasgrid's premises and sites.

4 Environment

Gasgrid's Supplier shall at least comply with all applicable environmental requirements set forth in relevant laws, regulations and environmental permits in the jurisdiction where the Supplier operates. A Supplier shall support a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility. Suppliers should identify the environmental impacts of their operations and execute mitigation actions when required. Suppliers are expected to strive to continuously reduce the use of energy and water, as well as to minimize waste and emissions to the air, water and land in their operations, and mitigate impacts on biodiversity and climate.

Supplier is requested to consider the climate impact in its operations and reduce greenhouse gas emissions where reasonable. Suppliers are expected to promote the circular economy and pay attention to the efficient use of materials and the lifecycle impact of their products. Suppliers are encouraged to develop and diffuse environmentally friendly technologies.

5 Business transparency

Gasgrid's Suppliers shall be legal entities that are duly organized and legitimately exist under applicable laws. Suppliers shall comply fully with applicable tax laws and pay all taxes and other official payments as set by the authorities. Suppliers shall have the right to conduct their business, enter into an agreement with Gasgrid and perform their obligations accordingly. Suppliers should have risk management in place.

6 Compliance with Code

Gasgrid's Suppliers shall confirm compliance with this Code by continuously documenting its compliance, providing information to Gasgrid on request, and allowing on-site audits by Gasgrid or by an external auditing partner representing Gasgrid. Material breach of the Code or repeated refusal to provide the required information may lead to the termination of cooperation with Gasgrid.

Gasgrid's Suppliers should report any suspected violation of the Code to Gasgrid Whistleblowing Channel (see: [Whistleblowing Channel](#)). Whistleblowing is available to any internal or external stakeholder, and it can be used anonymously.

This Code is amended occasionally. The most recent version is available at: [Sustainability](#).