

## SUPPLIER CODE OF CONDUCT

### Purpose and application of the principles

We are committed to promoting sustainable business as well as responsible practices and their development. Lumme Energia's employees are bound by the company's ethical principles (Code of Conduct). Lumme Energia is an energy services company that aims to provide its customers the best solutions for sustainable energy use. Energy companies have a significant social role, emphasizing the demand for ethics and transparency. For this reason, we consider it important that our suppliers also take exemplary care of their sustainability obligations.

We expect our suppliers to commit to addressing for the economic, social, and environmental impacts of their operations. Additionally, in accordance with the corporate sustainability due diligence obligation, our direct suppliers shall oversee that the legislation and corporate responsibility requirements are followed within their value chains.

The supplier ensures within its own organization the informing of those individuals whose tasks these corporate responsibility requirements concern. We are ready to support the promotion of socially, economically, and environmentally sustainable practices by sharing our own experiences and developing practices collaboratively. These sustainability requirements (hereinafter referred to as "principles") include minimum requirements that suppliers shall comply with when in business relations with Lumme Energia. In addition to these principles, additional requirements may be agreed upon in service and procurement contracts between Lumme Energia and suppliers.

The supplier is required to have appropriate means to ensure that the requirements described in these principles are met. Additionally, the supplier commits to continuously improving its operations in accordance with these requirements.

### Lawfulness of operations

Lumme Energia's service providers and other suppliers and partners (hereinafter referred to as "suppliers") commit to complying with existing laws, regulatory requirements, marketplace guidelines, and best business practices within their industry in the countries where they operate.

### Business practices

#### **Human rights and labour**

The supplier respects human rights and ensures that its operations are not involved in human rights violations. Additionally, the supplier appropriately investigates the human rights aspects and impacts of its operations throughout its entire value chain. The supplier shall treat all its employees fairly and respectfully. The supplier's employees shall have the right to organize, the right to belong to an association and the right to collective bargaining. Forced labour in any form is prohibited. The supplier must not discriminate against its employees. Reasonable special treatment, aimed at effectively promoting equality or preventing or eliminating the disadvantages caused by discrimination, is permitted.

The supplier commits to not hiring children under the age of 15 or below the nationally defined minimum age for employment, if higher (in accordance with the ILO Minimum Age



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Convention No. 138). If the employee is under 18 years old, the work shall not endanger the employee's education, health, or safety.

The supplier shall pay its employees' wages in accordance with applicable laws and regulations (including applicable collective agreements) and comply with the working hours specified in the applicable legislation and collective agreements. The supplier shall ensure that it has taken care of occupational health and safety matters in accordance with applicable legislation. Additionally, the supplier shall develop internal guidelines and procedures concerning occupational health and safety and inform all employees of them. The supplier must report all occupational health and safety-related incidents and accidents and investigate them.

The supplier withdraws from harmful behavior. Harassment in any form is prohibited. Every person's right to self-determination shall be respected. The supplier must have a clear process in place if harassment or other inappropriate behavior, such as sexual harassment, offenses, bullying, intimidation, threats, abuse, or physical or psychological violence, occurs within the organization.

### **Business ethics**

The supplier commits to refraining from engaging in bribery, money laundering, or facilitating such activities, circumventing sanctions, tax evasion, corruption, or illegal trade restrictions. The supplier actively instructs its employees to prevent criminal and unethical conduct.

Corruption and bribery in any form are prohibited, including obtaining or pursuing personal or business advantages through improper or illegal means, or attempting such actions. The supplier must never offer Lumme Energia's personnel gifts, hospitality, or other benefits valued above nominal amounts. Gifts or hospitality shall never be offered during a tendering or decision-making process.

The supplier must identify conflicts of interest in its own operations and take them into account in its decision-making, including when offering its services to Lumme Energia.

### **Treatment of customers**

The supplier must communicate about its products and services clearly, honestly, and responsibly. The supplier shall ensure that customers understand what they are committing to and that their choices are informed. The supplier's sales marketing on behalf of Lumme Energia shall be ethically sustainable, and the supplier must withdraw from customer harassment, coercion, pressure, or other inappropriate treatment. The supplier's compensation models shall not encourage aggressive or otherwise inappropriate sales tactics.

### **Product safety**

All products and services must fulfill the quality and safety requirements defined in the contracts as well as all legislative requirements. The supplier must use materials and components with known origins, ensure traceability of raw materials and finished products, and provide related information to Lumme Energia upon request. The supplier shall ensure that the delivered products are safe for both people and the environment.



### **Information security and data protection**

The supplier shall commit to information security work to protect and ensure the confidentiality, integrity, and availability of information and materials, especially those related to Lumme Energia and its stakeholders. The supplier is expected to respect everyone's right to privacy and handle personal data in accordance with good data processing principles and applicable legislation, such as the General Data Protection Regulation.

### **Intellectual property rights**

The supplier must commit to respecting and protecting the intellectual property rights of Lumme Energia and third parties. The supplier commits to complying with all laws applicable to intellectual property rights, including protection related to data transfer, patents, copyrights, and trademarks.

### **Business continuity planning**

The supplier must be aware of external and internal risks that affect the continuity of its business operations. The supplier shall have up-to-date continuity plans and technical recovery plans in place for the services provided to Lumme Energia. The plans in question are to take into account also supplier's own value chains. The supplier must regularly exercise and test the effectiveness of its plans.

## **Environment**

Respecting the environment is an essential part of Lumme Energia's sustainability. We also expect our suppliers to be aware of their own environmental impacts and to consider them in their operations. Upon request, the supplier shall be able to demonstrate the monitoring mechanisms it has in place to reduce its environmental impacts in its operations and value chain. The supplier must comply with environmental legislation, and it must be able to demonstrate their commitment to considering environmental aspects in their operations.

The supplier ensures that operations promote circular economy practices, such as, efficient resource utilization and reduction of harmful substances concerning climate, energy, materials, and waste. The supplier shall pay attention to evaluating, reducing, and preventing its environmental impacts throughout the value chain via life cycle assessment. The supplier shall be able to provide reliable and pertinent environmental information about its products and services, such as, emission impacts and recycling rates.

We also encourage the development and use of environmentally friendly solutions. Particularly in emission-intensive sectors, suppliers shall pay special attention to their own carbon footprint, its monitoring, and clear goals to reduce their environmental impacts.

## **Monitoring and reporting**

Lumme Energia conducts systematic evaluations and audits of suppliers to ensure compliance with these ethical principles. Supplier personnel can report any violations of



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these principles through the whistleblowing reporting channel available on Lumme Energia's website. Reports can be submitted anonymously if desired.

The supplier commits to rectifying all violations of these principles. The supplier must also ensure that its employees and other stakeholders have the opportunity to safely express their concerns and report any observed irregularities, and that there are proper procedures for handling such reports. The rights and privacy of all individuals who report violations and unethical conduct in good faith must be protected, and no countermeasures are permitted in any form.

If the supplier becomes aware that its own employees or Lumme Energia's employees have violated the requirements of these principles, the supplier must notify Lumme Energia as soon as possible. If the supplier is unable to discuss the matter with Lumme Energia's contact persons, reports can be submitted through the whistleblowing reporting channel available on Lumme Energia's website.

## Notifications and asking for advice

The confirmation of acceptance and inquiries related to these ethical principles are to be sent to the address [sustainability@lumme-energia.fi](mailto:sustainability@lumme-energia.fi).

## Approval

Place

Date

Company name

Signature

Company's Business ID

