



# **GASUM CODE OF CONDUCT**

FOR BUSINESS PARTNERS

12/2023

**EN**

# Responsible business is the cornerstone of sustainability

Sustainability is at the heart of Gasum's strategy and all our actions. We look at sustainability holistically through environmental, social and economic lenses. This means enabling emission reductions for our customers, reducing the environmental impacts of our own operations, promoting a safe work environment and ensuring responsible business practices.

But what does **responsible business practices** mean and why is it important?

Responsible business practices are about making the right decision in every situation. Gasum's Business Partner Code of Conduct sets out clear requirements our partners are expected to comply with when doing business with us.

For Gasum, doing business responsibly means that our colleagues, customers, suppliers, partners and other stakeholders can trust in us to engage with them transparently and consistently.

We respect every person we interact with, we respect the rule of law, we respect the environment – and we require our partners to do so as well.

If you have any questions about this Code of Conduct or its application in relation to your organization, please do not hesitate to contact us. We are here to support you.

At Gasum we value the relationships we have with our partners and by aligning expectations we ensure a consistent and stable working environment. By working together with respect, safety and transparency, we can build on strengthening responsible business practices across the industry for a just and sustainable society.

## The Gasum Values



Respect

Sustainability

Positive energy



## 1 Do not engage in bribery or corruption

We win business due to our high-quality products and services, not by unethical behavior by either our employees or business partners. We have a zero tolerance for corruption and expect the same from our business partners. As Gasum's business partner, you may not offer anything of value to our employees, public authorities or third parties, or accept anything of value from any party, that could have an undue influence on decision-making processes and fair competition. We also prohibit anyone representing us as a distributor, reseller or partner to offer or accept anything of value that could have an undue influence on decision-making processes or fair competition. All favors and gifts given and accepted must be relevant, reasonable, transparent and in compliance with applicable laws and regulations.

Business decisions must always be made in the best interests of the companies involved, i.e. both the business partner and Gasum. Personal relations or considerations will never influence decision-making. We expect our employees and business partners to disclose any personal or professional relationship that may, either directly or indirectly, result in a conflict of interest.

## 2 Compete fairly

We are committed to free competition with no hidden or unfair advantages. We respect and comply with antitrust laws that regulate the rules on how we can cooperate with our competitors on a horizontal level and with our distributors on a vertical level. We require the same from our business partners.

As our business partner, we require you to compete freely and fairly, in compliance with international and national competition laws and regulations at all times.

## 3 Respect international trade obligations

We acknowledge that trade sanctions and other restrictive measures may affect our operations, customers or business partners. As a business partner, you must ensure that your business practices are in accordance with the applicable regulations governing the import or export of your deliverables, and comply with all applicable trade sanctions and restrictions.

A business partner must warrant that neither it nor its affiliated companies, beneficiaries or directors are subject to any economic or administrative sanctions.

## 4 Maintain quality excellence and regulatory compliance

A business partner is required to have appropriate management systems in place to ensure compliance with the requirements of this Code and relevant laws and regulations. The functioning and quality of the management systems shall be in proportion to the size, complexity and risk environment of the business partner. In practice, this means adopting a structured approach to the assessment, mitigation and management of risks. In addition, the business partner must have in place adequate monitoring, control activities, communication and training with regard to the requirements and to ensure their ability to keep accurate records of their operations.

## 5 Respect the environment and combat climate change

A business partner is expected to have a precautionary approach to environmental challenges within their value chain. The business partner is encouraged to establish procedures to identify the most significant environmental impacts of their operations (including air, water and soil pollution, waste and resource efficiency, biodiversity) and implement mitigation actions when required. A business partner should consider their climate impact and reduce greenhouse gas emissions where reasonable.

A business partner is required to have appropriate management system in place to ensure compliance with the requirements of this Code and relevant laws and regulations. The functioning and quality of the management systems shall be in proportion to the size, complexity, and risk environment of the business partner.

## 6 Respect human rights

We are committed to respecting human rights in line with internationally recognized human rights standards. We do not approve of any complicity in human rights abuses such as child or forced labor.

We expect that our business partners know, understand and respect fundamental human rights, and apply them equally to all employees whether temporarily or permanently hired, or contracted. We require from our business partners a commitment to the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO Core Conventions on Labor Standards.

## 7 Manage confidential information

By accepting this Code, the business partner commits to their respective confidentiality obligations with Gasum. Under no circumstances shall any business partner abuse or disclose any information that may qualify as sensitive personal data, inside information in the meaning of any energy market, stock or anti-trust regulation, or other information the confidentiality of which is protected by law or contracts.

## 8 Protect personal data and privacy

We are committed to protecting and respecting the privacy of our stakeholders and require our business partners to do the same. We require that our business partners collect, use, store and process personal data carefully, responsibly and in compliance with applicable laws and regulations and that our business partners take adequate measures to ensure information security.

For information on the handling of personal data, you may turn to the Gasum Group Privacy Statement available at our website, our customer service or your Gasum contact person.

## 9 Excel in health safety and security

We aim and commit to a safe and secure working place and working environment for all employees at all our sites. We enable a proactive safety culture and have a strong focus on continuous improvement. We strive for proactive work with regard to crisis management, business disruptions and safety and information security incidents. As our business partner we expect you to have a similar proactive system in place to provide a healthy, safe and secure workplace to your employees, in compliance with all applicable laws and regulations. The functioning and quality of the management system shall be in proportion to the size, complexity, and risk environment of the business partner.

A business partner working at Gasum sites shall comply with Gasum's health and safety requirements and ensure that appropriate health and safety information and required equipment are provided to its employees and contractors.

## 10 Maintain a fair workplace

We require our business partners to hire and treat employees in a manner that does not discriminate with regard to gender, nationality, religion, race, age, disability, sexual orientation, political opinion, union membership, or social or ethnic origin, or other similar aspects relating to individuals. We expect our business partners to promote and ensure the principles of equal treatment and dignity of all employees.

Our business partners are expected to pay all workers at minimum a wage that meets basic needs and is in compliance with all applicable laws.

## 11 Raise and address concerns

Should you note breaches of this Code or related concerns, you are expected to raise such concerns with your Gasum contact person, Gasum's Group Compliance Officer or via Gasum's whistleblowing channel available on the Gasum website.



# Compliance and auditing

As a business partner you undertake to provide Gasum with all such information on your management systems, environmental performance and other topics, which is necessary and relevant for Gasum to verify your compliance with this Code. You also undertake to allow Gasum or its representatives access to the relevant premises and documentation in order for Gasum to verify that you as the business partner and your employees and affiliated companies, as well as any subcontractors that are relevant for our business relationship, comply with this Code. Gasum's requests related to above verifications must be responded to in a timely and precise manner, provided that such requests are reasonable and respect your confidentiality commitments to third parties.

As a business partner you understand and agree that the expectations and requirements set out in this Code are of great importance to Gasum and that non-compliance with and material deviations from this Code by you, your employees and affiliated companies as well as by your subcontractors that are relevant for our business relationship, must be addressed and corrected with urgency and, if left uncorrected after written notice, entitle Gasum to terminate our business relationship (including contracts) with you.





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