



GASUM CODE OF CONDUCT

FOR EMPLOYEES

12/2023

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GASUM CODE OF CONDUCT



Gasum Code of Conduct describes our responsible business practices and ways of working with our customers and stakeholders, and together as an organization.



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Responsible business is the cornerstone of sustainability

Sustainability is at the heart of our 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 every day. The Gasum Code of Conduct is our guide that helps us make those right decisions in our day-to-day work.

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 and we respect the environment.

The Gasum Code of Conduct is an integral element of the Gasum culture and creating a workplace where we can all feel safe and respected just as we are. It is a reflection of our values as a community.

At Gasum everyone should feel safe to raise concerns and speak up. To ensure that concerns are brought forward, we maintain a confidential whistleblowing channel that can be used both by Gasum employees as well as external stakeholders.

Each one of us at Gasum has a responsibility to know the Code of Conduct and to make sure that ourselves and everyone around us works in accordance with it. We also have the responsibility to speak up if any concerns arise.

By paying consistent attention to respect, safety and transparency, we build a sustainable Gasum community that we can all be proud of today and tomorrow.

The Gasum Values



Respect

Sustainability

Positive energy



This is our Code of Conduct

Who does this policy apply to?

- The Code of Conduct applies to each and every one working at or on behalf of Gasum; employees, consultants, resellers and representatives and our affiliates.
- We expect our business partners to comply with the same standards on transparent and ethical business as we do.

What is expected from me as an employee?

- Read and understand the Code of Conduct and related policies, directives and guidelines which can be found in the Integrated Management System.
- Complete Code of Conduct trainings and seek guidance when you have questions or concerns about how to act.
- Strive to continuously improve ways of working and do not compromise on the standards.
- Be alert to actions by employees or business partners which do not comply with our Code of Conduct.

- Speak up if you become aware of violations of the Code of Conduct. Raise concerns to your line manager, Human Resources (HR) or to the Group Compliance Officer directly or through the confidential whistleblowing channel.
- Cooperate fully and transparently in all compliance-related matters and reviews.

What is expected from leaders?

- The foundation for a transparent and ethical culture is leadership.
- Stay updated on the Integrated Management System, Corporate Governance, related policies, directives and guidelines. Ensure that your team knows where to find relevant documents and guidance.
- Lead by example and share learnings and best practices with your colleagues and team.
- Share information and ensure that training is included in the on-boarding process for new employees.
- Promote a culture of discussing dilemmas, ethical concerns and transparency in your team.

What happens if I do not comply?

- We are proud of our culture and values and take actions of non-compliance very seriously. We review concerns of non-compliance in an objective and fair manner.
- Failure to comply with our Code of Conduct may lead to disciplinary actions up to and including termination of your employment or contractual relationship.

Where do I go if I have questions?

- Your line manager is the first point of contact, but you can also get in touch with HR and the Group Compliance Officer.
- Confidential requests and concerns can be submitted to the whistleblowing reporting channel available on Gasum's website and intranet.
- The Group Compliance Officer provides support, conducts independent reviews of concerns, and prepares reports on compliance to the Executive Management and the Board of Directors.

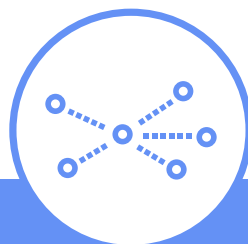


This is how we conduct responsible business



Working with our customers

Do not engage in bribery or corruption
compete fairly
Respect international trade obligations
Maintain quality excellence and
regulatory compliance



Working with our stakeholders

Respect the environment and
combat climate change
Respect human rights
Protect confidential information
Manage personal data and privacy



Working together

Excel in health & safety and security
Maintain a fair workplace
Manage our business partners
Raise and address concerns



Working with our customers



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Do not engage in bribery or corruption

We win business as a result of our secure and sustainable supply of energy to our customers, and not through unethical behavior by our employees or business partners. We do not seek to obtain favorable decisions on public policies from authorities through inappropriate or illegal means. We recognize that even customary gifts, entertainment and donations may be inappropriate in connection with ongoing business negotiations. We acknowledge that non-compliance with anti-corruption obligations may result in significant legal, financial and reputational consequences for the company.

What this means in practice

Conflicts of interest

- We do not enter into business relationships that may, either directly or indirectly, result in a conflict of interest.
- All persons who are in positions to make commitments binding on Gasum must ensure their objectivity when making decisions on behalf of the company. Cooperation with family members or family companies or related parties, which could be a cause for potential or actual conflict of interest or bias, is not allowed.
- Any receipt of a gift or favor that is non-customary and may result in a conflict of interest must be declared and clarified in advance with receiver's line manager.

Gifts and hospitality

- We do not give or receive gifts or hospitality that could have an undue influence on decision-making processes relating to Gasum and its business.
- We provide only customary gifts and hospitality, and always respect applicable local laws, regulations and policies.
- We only provide gifts as a matter of courtesy and in an open and transparent manner. All dealings are approved by the relevant parties and supported by original receipts and documentation.
- We acknowledge that government officials in many markets may have very strict rules for gifts and hospitality.

Sponsorships

- The aim of our sponsorship and support activities is to reinforce Gasum's strategic objectives, maintain our corporate image, as well as carry out marketing and responsible business activities. All sponsorships and donations are managed by Gasum Group Communications.
- We do not make contributions to political parties or activities.

Key principles



We only engage in business representation and hospitality that is:

- 1 RELEVANT** – promotes the awareness and visibility of Gasum, supports our business objectives and has a visible and legitimate business purpose.
- 2 REASONABLE** – the expense per participant is reasonable, and the nature of the hospitality is such that we avoid even the appearance of impropriety or excess.
- 3 TRANSPARENT** – all business hospitality is conducted in an open and respectful manner. No aspect of the exchange or activity is concealed or risks misinterpretation.

Compete fairly

Competition is a natural aspect of operating in the open markets. We are committed to competing freely in the market with no concealed or unfair advantages, while considering our position in the market. Antitrust laws regulate the rules concerning our co-operation with our competitors at a horizontal level, and with our resellers at a vertical level.

What this means in practice

- Examples of anti-competitive activities include establishing agreements with competitors for the setting of any terms of sale, such as price, discount and credit terms, rigged bidding, market or customer division between competitors, and boycotts.
- Any sharing of the markets or otherwise restricting competition is forbidden.
- A role as a dominant market player imposes further restrictions for market behavior. We comply with rules applicable to dominant market players with regard to business areas where Gasum is a dominant player.
- We adhere to restrictions on information sharing and use during pending mergers and acquisitions (M&A) processes.

Information sharing among competitors or distributors

- If you are entering into discussions with competitors, distributors or resellers, or attending events where such discussions may come up, please contact the Group Compliance Officer for further antitrust guidance on limitations to information sharing.

Campaigns and pricing

- If you are planning on new pricing models or price reduction campaigns, please involve the management and the Group Compliance Officer to ensure compliance with antitrust laws.
- Always consult with your line manager and the Group Compliance Officer prior to bundled sales strategies, meaning the sale of one product on the condition of the purchase of another.

Key principles



- 1 Deal with each customer honestly and fairly and restrict your conversation to that customer's business.
- 2 Do not discuss any company's current or future pricing strategies with competitors.
- 3 Only rely on public sources for information about competitors.
- 4 Be alert about competition law restrictions in mergers and acquisitions (M&A) processes.
- 5 Think about antitrust issues when considering new pricing models.

Respect international trade obligations

We acknowledge that trade sanctions and other restrictive measures may apply to or otherwise affect our operations, customers or business partners. We comply with international trade obligations across our businesses and countries where we operate. We acknowledge that non-compliance with trade sanction obligations may result in significant legal, financial and reputational consequences for the company.

What this means in practice

- We are aware of that trade sanctions and other restrictive measures against countries, organizations, groups, entities and individuals, such as terrorist groups and terrorists (which are below referred to as "restricted parties") may affect Gasum and its business.
- When entering into a contract or business relationship with a new business partner such as a customer, distributor or supplier, we use risk-based due diligence to ensure that the partner is not subject to any sanctions or restrictions.
- We do not enter into business relationships with restricted parties.
- Any business relationship with a restricted party must be immediately terminated and reported to the Group Compliance Officer for further evaluation.
- Each manager who proposes a business partner relationship is responsible for ensuring compliance with the business partner evaluation principles and screening process for all prospective business partners.

Key principles



- 1 Identify high-risk counterparties or transactions before entering into a business relationship.
- 2 Ensure compliance with the business partner evaluation principles and screening process.
- 3 Actively monitor developments for changes in ownership structures or business transactions.
- 4 Inform business partners of obligations to comply with international trade sanctions.

Maintain quality excellence and regulatory compliance

Operating with the highest standards of quality and operational excellence is a fundamental responsibility for Gasum. We offer our customers a range of high-quality products and services. We aim to continuously improve the quality of our activities, prioritizing our customers' needs and expectations. We are committed to complying with all laws and regulations that are applicable to our operations and to keeping accurate records of our operations.

What this means in practice

- Our main tools for quality management and regulatory excellence are processes that ensure continuous compliance with laws and regulations, such as our Integrated Management System that is compliant with ISO 9001, ISO 14001, ISO 50001, ISO 45001 and the biogas sustainability schemes.
- Our operating principles, as described in the Gasum Integrated Management System, are binding on all our activities and on our entire personnel.
- Line managers are responsible for awareness of country and regionally specific regulatory requirements.

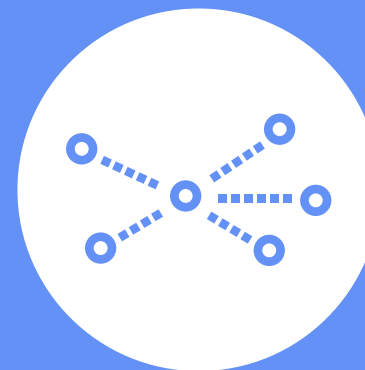
- As an employee, you are responsible for understanding and complying with all quality and regulatory processes and procedures that are relevant to your work.
- Operational quality and compliance are continuously evaluated through both internal audits and by external parties and certification agencies.
- We call attention to risks and red flags relating to quality and regulatory expectations immediately with the relevant line managers.
- We strive for the immediate correction of operational weaknesses and concerns.
- We expect our suppliers and distributors to comply with the principles set out in our Business Partner Code of Conduct as well as with industry-specific quality-related standards. We implement processes to monitor compliance throughout our supply chain.

Quality policy



- 1 We are aware of and act in accordance with laws and regulatory requirements applicable to our operating countries.
- 2 We understand and comply with Gasum's Integrated Management System.
- 3 We ensure that business partners understand our quality requirements and expectations.
- 4 We promptly report any red flags or issues that may lead to or indicate quality issues.

Working with our stakeholders



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Respect the environment and combat climate change

Our purpose is cleaner energy. We respond to the challenge of climate change by helping our customers to reduce their greenhouse gas emissions and local air pollution. Our aim is to increasingly shift towards renewable gas and electricity in our offering. We are committed to promote circular economy which is an efficient way in supporting climate change mitigation, resource efficiency and sustainable growth. We are committed to environmentally sound business practices in our operations.

What this means in practice

- We increase the availability of renewable energy to our customers, enabling them to reduce their greenhouse gas emissions and local air pollution.
- We promote circular economy by converting biodegradable waste and residue feedstocks into energy and recycled nutrients, and at the same time by reducing risk to biodiversity.
- We consider the life cycle of our products. We implement ways to reduce our climate impact and are committed to reaching our climate targets.

- We decrease our environmental impact by employing environmentally sound and energy-efficient technologies and utilize renewable electricity in our operations. We use resources, such as energy and water, efficiently, and reuse and recycle to minimize waste.
- In our daily work, we make systematic efforts to minimize potential local environmental impacts such as air, water and soil pollution, odor nuisances, and environmental impacts such as noise caused during project construction and we maintain responsible chemicals management.
- Our main tools for environmental and energy management are processes that ensure continuous compliance with environmental law and regulations, such as our Integrated Management System that is compliant with ISO 9001, ISO 14001, ISO 50001, ISO 45001 and the biogas sustainability schemes.

Environmental policy



- 1 We add value to our customers' businesses by supporting them to find sustainable energy solutions.
- 2 We implement ways to reduce our climate impact for example by striving to increase energy efficiency.
- 3 We promote sustainability by integrating zero waste and circular economy thinking into our operations.
- 4 We are aware of the regulatory and authority requirements set for our operations and ensure compliance.
- 5 We proactively make observations and follow up on any deviations to prevent environmental damage and to continuously improve our daily operations.



Respect human rights

Gasum respects human rights in accordance with the internationally recognized human rights standards. We do not accept any involvement in any human rights abuses.

We are committed to the principles stated in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (UNGP), the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the International Labour Organisation (ILO) Core Conventions on Labour Standards.

What this means in practice

- We perform risk assessments to develop our work in upholding human rights. Continuous collaboration with our different stakeholders and business partners is a crucial part of this effort.
- We seek to be a responsible actor in the societies where we operate and take actions to ensure that human rights are respected throughout our operations. We expect a similar commitment from our business partners as specified in our Business Partner Code of Conduct.
- We strive to avoid any risk of becoming linked, through our business relationships, to any form of modern slavery, including forced labor or human trafficking. We do not, under any conditions, tolerate the use of forced, compulsory or child labor.
- We are committed to complying with all laws concerning privacy, freedom of association, collective bargaining, working time, wages and salaries.
- We value diversity and ensure equality of opportunity and treatment in all our processes relating to our personnel, such as the recruitment and development of employees and their working conditions as well as employees' remuneration and promotion, without discrimination on grounds of gender, age, race, ethnicity, religion, political opinion, language, sexual orientation, family ties, disability or other similar aspects relating to individuals.
- We create and maintain an environment that treats all employees with dignity and respect. We do not engage in or tolerate any threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse.

Key principles



- 1 We have zero tolerance for discrimination.
- 2 We treat people with respect, and we protect and promote fundamental and human rights.
- 3 We provide a safe and healthy workplace.
- 4 We comply with laws related to wages, working hours and other conditions of work.
- 5 We reduce our impact on the environment and local communities.
- 6 We handle the personal data of our employees, customers, and business partners responsibly.
- 7 We conduct our business relationships ethically and with honesty.

Protect confidential information

The objective of Gasum's communications is to exchange information in a speedy, open, efficient, active and interactive manner. We recognize that information is a critical business asset, and that non-public information is confidential and may in some cases also be considered inside information.

What this means in practice

- We acknowledge that confidential information possessed by Gasum or its business partners must be managed in a safe and trustworthy manner.
- We do not share confidential information with unauthorized parties.
- We do not accept confidential information that we are not legally entitled to from business partners.
- Any employee that possesses non-public information that can be classified as inside information is restricted from trading in Gasum's, its customers' or business partners' securities based on this information. Advising or allowing another party to use this information (i.e. tipping) is also prohibited.
- We take measures to protect confidential information when traveling and interacting with colleagues in public places such as airplanes, trains, restaurants and taxis.
- We immediately notify our line manager and the Group Compliance Officer if there is a risk of a leak in confidential information.
- Before entering into discussions where confidential information may be disclosed, we ensure that a non-disclosure agreement (NDA) has been signed.
- External communication on behalf of Gasum can only be released by authorized individuals.
- The Legal & Compliance function maintains a process for managing regulatory or M&A project-related inside information and complying with regulations relating to market disclosures.

Document classification principles



The handling of Gasum's internal documents is governed by a four-tier classification system for information:

- 1 Public information is information that can be used and disclosed outside Gasum.
- 2 Internal information is intended only for Gasum's internal use but is available to all Gasum employees.
- 3 Confidential information is intended for Gasum's internal use, and access rights to the information have been determined separately.
- 4 Classified information is internal information relating to Gasum that is only accessible by specifically designated persons.

The content owner of a document is responsible for the classification of the document.



Manage personal data & privacy

We are committed to honoring and protecting the privacy of our employees and other stakeholders and to processing personal data in accordance with applicable laws and regulations and good data protection practices.

What this means in practice

- We ensure that we have processes and organizational structures in place to protect and manage data according to applicable laws and regulations.
 - We immediately notify the Group Compliance Officer, IT and HR if there is a risk of a leak or potential infringement of personal data. The notifications will be further handled by the Gasum Information and Cybersecurity Committee.
 - We assess and have a system in place for documenting the legal basis for processing activities involving personal data.
 - Where applicable, we issue privacy notices informing individuals of the details surrounding data processing activities and their rights and freedoms in accordance with the EU General Data Protection Regulation (GDPR).
- Where applicable, we enter into data processing agreements.
 - Data subjects have the right to request personal data access, correction or restricted processing based on legal grounds according to the Gasum Group Privacy Statement available on our website.
 - Gasum employees have the right to access all information relating to their own work by contacting HR.

Key principles



- 1 We process data with integrity and confidentiality in a lawful, fair and transparent manner.
- 2 We only collect and process data for specified, explicit and legitimate purposes.
- 3 Personal data is limited to what is adequate and relevant in relation to the purposes for which they are processed.
- 4 We keep only accurate personal data and take reasonable steps to ensure that inaccurate or irrelevant personal data is erased or rectified.
- 5 Any leakages or infringements are processed swiftly and in a professional manner.
- 6 We do not store personal data for longer periods than relevant in relation to the purposes for which they are processed.



Working together



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Excel in health, safety and security

Safety is our first priority. We aim for and commit to providing a safe and secure workplace and working environments for all employees at all our sites, as well as to enabling a proactive safety culture with a strong focus on continuous improvement. We strive to work proactively with regard to managing crises, business disruptions and cyber security incidents.

What this means in practice

- We put safety first in everything we do.
- We actively monitor our working and operating environment and promote the safety and security of our employees, customers, and suppliers.
- We comply with legal, regulatory and contractual requirements.
- Our goal is zero harm to people, to the environment and to assets.
- We provide products that meet our customers' demands while fulfilling applicable regulatory safety and security requirements.
- We continuously work with improvements that prevent and ensure a quick response to and recovery from possible cybersecurity incidents. We take proactive measures to ensure business continuity and our ability to persist in delivering our products and services even during exceptional circumstances.
- We have adequate safety instructions and equipment in place, including chemical safety, at our sites, and also train our contractors to follow these instructions and requirements.
- Our main tools for health, safety and security management are processes that ensure continuous compliance with law and regulations, such as our Integrated Management System that is compliant with ISO 9001, ISO 14001, ISO 50001 and ISO 45001.
- Each of us has the responsibility to practice due caution in our everyday tasks to prevent safety and information security incidents.

Health and safety policy



We expect that all employees comply and act in accordance with our safety and security principles:

- 1 Safety first. All employees are safety ambassadors and should serve as role models for safety and security.
- 2 All employees must understand and manage their risks.
- 3 We stop unsafe and unsecure behaviors and activities.
- 4 We continuously improve and openly report and learn from all safety and security incidents.
- 5 We are aware of the emergency procedures and comply with the relevant Business Continuity Plans.

Maintain a fair workplace

Our human resources policies and practices are based on equality and the absolute prohibition of discrimination on the basis of age, health or other similar aspects relating to a person. The foundation of our work culture and the purpose of the Gasum Compass is to enable good leadership and collaboration, a healthy working environment, and the fair treatment of our employees. Gasum wants every employee to feel valued and seeks to offer each person growth opportunities and careers that they can be proud of.

What this means in practice

- We are committed to equal opportunity in all our employment practices and policies.
 - We emphasize fair treatment and equal opportunity in our processes. Every Gasum employee contributes towards achieving equality and equity in everyday life.
 - We continuously invest in the personal learning and growth of Gasum employees, and we encourage our employees to lead balanced personal and professional lives.
- We focus on creating awareness and engagement regarding fair employment policies across all our businesses.
 - We develop our management so that everyone has the opportunity to succeed at work and achieve the set goals
 - We ensure that our remuneration practices are fair, reasonable and in line with market standards for our industry.
 - At Gasum, our objective is to continuously develop employee wellbeing. Our preventative occupational health care aims to achieve a healthy and safe working environment and workplace community, prevent work-related health concerns, and maintain, promote, and monitor employees' health as well as their work and functional capacity in the various stages of their careers.
 - A key feature of Gasum's work culture is that everyone can work safely and in peace. We have zero tolerance for harassment or any kind of inappropriate behavior. All incidents must be addressed and resolved immediately.

The Gasum Compass



- 1 WE DELIVER ON OUR PROMISES** – This means promises to both customers as well as colleagues. We care for Gasum's success and the success of our customers.
- 2 WE BUILD A SAFE ENVIRONMENT TOGETHER** – Safety means both physical and psychological safety. A safe work environment means zero injuries as well as trust and respect in each interaction we have.
- 3 WE CELEBRATE AND GIVE PRAISE TO EACH OTHER** – We have fun at work together. We encourage and energize the people around us and make each other successful.
- 4 WE LEARN, SHARE AND DEVELOP** – By sharing information and collaborating, we improve our ways of working continuously. We explore new opportunities for improvement with open minds.



Manage our business partners

Business partners – such as customers, suppliers, distributors and resellers – are critical for the success of our company. We take action to ensure that all our business relationships are based on trust and transparency, and that we know who our business partners are and how they operate. We seek to work with others who share our commitment to responsible business.

What this means in practice

- We communicate our expectations and requirements to our suppliers and business partners using our Business Partner Code of Conduct.
- Before entering into a business relationship, we perform risk-based due diligence and screen our business partners to ensure that we know who we are doing business with. We focus in particular on managing risks related to trade compliance, bribery and corruption, human rights, money laundering, fraud and possible financial issues. We also consider social and environmental aspects.
- We continuously monitor the performance of our business partners through our supplier assessment process. Deviations and non-compliance with our Business Partner Code of Conduct may lead to termination of the relationship.
- Any employee who becomes aware of an instance of possible non-compliance by a business partner must report the activity to their line manager. The line manager should in turn take action to resolve the concern and involve other relevant functions or personnel.

Key principles



- 1 Know who we are doing business with. Counterparty and Credit Risk Policy sets the detailed requirements for the counterparty identification process.
- 2 Communicate our expectations on Responsible business-to-business partners.
- 3 Monitor business partners and offer support, with an understanding of how to apply our Business Partner Code of Conduct in practice.
- 4 Report and manage deviations in a timely manner.



Raise and address concerns

Gasum is committed to the highest standards of ethical, moral and legal business conduct. Every person in the company is accountable for responsible business behavior, which is reflected not only in our relationships with each other, but also in those with our customers, suppliers, shareholders, and other stakeholders.

The Gasum Code of Conduct and related policies, directives and instructions are a key component of our commitment to high standards of business and personal ethics in our business operations. A healthy speak-up culture of openness, integrity and accountability is essential in order to prevent, detect and react to suspected misconduct or breaches of our Code of Conduct, Corporate Governance or Integrated Management System.

What this means in practice

- Gasum encourages and expects all employees to report concerns, incidents of non-compliance or suspected misconduct using the appropriate reporting channels.
- If you are not comfortable raising the concern with your line manager or HR directly, you may use the whistleblowing reporting channel available on Gasum's website and Intranet. It is a channel that allows for confidential reporting.
 - All alleged incidents of misconduct communicated through the reporting channel will be reviewed in accordance with the related response and review processes. Only the Group Compliance Officer and the Head of HR or a person specifically appointed by them will have access to the report.
- All reports, regardless of the reporting channel, are handled confidentially.
- A report will not be investigated by someone who may be affected or connected with the concern or closely associated with the alleged perpetrator.
- A whistle blower or person speaking up does not need to have firm evidence of the malpractice before expressing a concern. However, the use of the whistleblowing channel must be made in good faith, even if the information later turns out to be inaccurate or does not trigger any particular further action.
- The HR function is responsible for monitoring and reacting to any attempt to apply a sanction or to disadvantage or discriminate against any person who expresses an intention to raise a concern, has raised a genuine concern in good faith, or cooperates in a company review or investigation.
- Concerns of retaliation or failure to monitor and react to concerns of retaliation may be reported to the Group Compliance Officer.
- Failure to comply with our Code of Conduct may lead to disciplinary actions up to and including termination of employment or contractual relationship.

How to raise a concern



- 1 Talk to your line manager.
- 2 Discuss with HR or local management.
- 3 If you are not comfortable raising the issue with your line manager or HR, you can contact the Group Compliance Officer.
- 4 Alternatively, you can file a report using the confidential whistleblowing reporting channel.

Don't hesitate to seek support.

If you feel unsure about
an action or a decision,
ask yourself:



Is it legal?



Could I tell my
manager about
this?



Do I feel
comfortable
with it?



How would I feel
if it was reported
in the media?



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