



**GASUM
HUMAN RIGHTS POLICY
DECEMBER 2025**

1. Introduction

Gasum is committed to respecting human rights throughout its own operations and across its value chain. We take a proactive approach to identifying, preventing, mitigating, and, where necessary, remediating any adverse human rights impacts we may cause or contribute to.

Our human rights due diligence framework is aligned with the UN Guiding Principles on Business and Human Rights and is implemented in accordance with the process outlined in the OECD Guidelines for Multinational Enterprises.

2. Gasum's commitment to human rights

Gasum respects and upholds internationally recognized human rights across all aspects of its operations. We maintain a zero-tolerance stance toward any form of human rights abuse and are fully committed to operating in alignment with the Universal Declaration of Human Rights. Our approach is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. We also support the principles of the United Nations Global Compact.

Gasum places the highest priority on respect for human rights as a fundamental component of our corporate integrity.

This commitment is firmly embedded in both our Code of Conduct and our Code of Conduct for Business Partners. Our approach is supported by comprehensive internal policies and operational guidelines, including:

- Gasum's Health and Safety Guidelines and adherence to ISO 45001 management system standards,
- Procurement Principles, and
- Equality Plan.

These frameworks establish ethical standards that guide our business conduct and stakeholder engagement, ensuring responsible practices across our operations and supply chain.

Gasum is committed to conducting ongoing human rights due diligence to identify, prevent, and mitigate any actual or potential adverse impacts. Where impacts do occur, we take appropriate steps to address and remediate them. We expect the same level of commitment from all our suppliers and business partners throughout the value chain.

3. Human rights due diligence

Gasum has a structured human rights due diligence process to identify, prevent, mitigate, and account for actual and potential human rights impacts across our operations and value chain. The approach is integrated into our group-wide risk management framework.

Our human rights risk assessment focuses on the most salient issues, including the occupational health and safety of employees and contractors, the risk of harassment or violence in the workplace, working conditions in the supply chain, and the protection of employee personal data. These issues are regularly assessed and reviewed through established internal processes.

The most significant direct human rights impact arises from ensuring the safety of employees and contractors working at Gasum's production sites. Further along the supply chain, potential indirect impacts may include inadequate occupational safety, excessive working hours, and restrictions on freedom of association.

We prioritize mitigation efforts in areas where the risk of adverse impacts is highest, assessing both the severity and likelihood of potential impacts in line with the UN Guiding Principles on Business and Human Rights. Mitigation actions are developed collaboratively across key business functions and in cooperation with internal and external stakeholders. Where feasible, we also engage affected stakeholders or their legitimate representatives to support informed and inclusive decision-making.

To ensure accountability and drive continuous improvement, we monitor our human rights performance through a range of mechanisms, including employee engagement activities, safety management systems, internal audits, and supplier evaluations. We report transparently on our performance and progress in our annual sustainability report.

4. Grievance mechanisms

Gasum provides accessible and reliable grievance mechanisms for all stakeholders. All reports are handled confidentially by our Compliance and HR functions to ensure integrity and appropriate follow-up.

In addition to our main whistleblowing channels, we offer specific reporting mechanisms for matters related to occupational and physical safety as well as customer concerns. We also provide internal forums, such as the Group-wide Ethics, Compliance and Risk network, to raise and discuss human rights issues.

Gasum strictly prohibits any form of retaliation against individuals who raise concerns in good faith. We are committed to fostering a culture of openness, accountability, and trust across our value chain.

5. Remedy

When we identify adverse human rights impacts in our own operations, we initiate an investigation and take appropriate action to prevent broader consequences. If such impacts have already occurred, we take measures to remediate the harm and review our practices to prevent recurrence.

If human rights impacts are identified in our value chain, we collaborate with the relevant partner to agree on corrective actions and use our leverage to ensure their implementation. In

cases where we have limited direct influence, we work with other companies and industry initiatives to address systemic issues.

7. Performance measurement and reporting

Gasum monitors the effectiveness of its human rights efforts through a combination of qualitative and quantitative performance indicators. These include health and safety metrics, employee engagement surveys, whistleblowing reports, training completion rates, supplier qualification data, as well as internal and external audit findings. Performance results are reviewed regularly and disclosed transparently in our annual sustainability report. The Gasum Human Rights Policy is publicly available on our website.

8. Governance, roles and responsibilities

Oversight of human rights is embedded into Gasum's governance framework, which aligns with our enterprise risk management approach. The Board of Directors oversees Gasum's overall sustainable business practices and approves Gasum's Code of Conduct, while the CEO ensures that human rights considerations are organized and managed as part of

Gasum's operations. The Human Rights Policy is formally approved by the Gasum Board of Directors.

Day-to-day ownership for maintaining and updating the Human Rights Policy, as well as assessing their relevance, lies with the Group Sustainability function. Group Sustainability acts in a supporting role by providing frameworks, tools, and guidance, and by consolidating the overall human rights risk view across Gasum. Each Gasum Unit is responsible for applying the Policy in practice, monitoring outcomes, and reporting on progress.

The consolidated human rights risk and compliance status is reported annually to the CEO and the Gasum Management Team, ensuring accountability and transparency across the organization. This Policy is reviewed annually by Group Sustainability and the Gasum Board of Directors.

Gasum



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