



**GASUM
CODE OF
CONDUCT**



For business partners



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CEO'S STATEMENT

RESPONSIBLE BUSINESS IN PRACTICE

The energy company Gasum is a Nordic gas sector and energy market expert. Gasum offers cleaner energy and energy market expert services for industry and for combined heat and power production, as well as cleaner fuel solutions for road and maritime transport. The company helps its customers reduce their own carbon footprint as well as that of their customers. Together with its partners, Gasum promotes the development towards a carbon-neutral future on land and at sea.

At Gasum, we are committed to responsible business both in terms of what we do and how we do things. For us, responsibility means taking social, environmental and economic responsibility into account in all our operations. We acknowledge the complexity of our value creation, supply chain and the risks we face together. This is why we have created this Business Partner Code of Conduct to clarify the requirements our Business Partners are expected to comply with when doing business with us. We recognize that in some cases, it will be challenging to meet these requirements, but we are committed to supporting you. Together, our joint efforts will contribute to strengthening responsible business practices across the industry. We will work together in order to maintain high ethical standards and to conduct business in a responsible way.

We believe that the requirements in this Business Partner Code of Conduct are the way toward prosperous collaboration. We believe that aligning expectations and needs ensures effectiveness, mutual value creation and positive societal development.



Johanna Lamminen
CEO

PRINCIPLES FOR RESPONSIBLE BUSINESS

Our responsible business expectations from you, as our Business Partners, are based on our fundamental principles:



- 1 AVOID BRIBERY AND CORRUPTION**
- 2 COMPETE FAIRLY**
- 3 RESPECT INTERNATIONAL TRADE OBLIGATIONS**
- 4 MAINTAIN QUALITY AND REGULATORY EXCELLENCE**
- 5 RESPECT THE ENVIRONMENT**
- 6 RESPECT HUMAN RIGHTS**
- 7 MANAGE CONFIDENTIAL INFORMATION**
- 8 PROTECT PERSONAL DATA AND PRIVACY**
- 9 EXCEL IN HEALTH AND SAFETY AND SECURITY**
- 10 HAVE A FAIR WORKPLACE**
- 11 RAISE AND ADDRESS CONCERNS**

1 AVOID BRIBERY AND CORRUPTION



We win business due to our high-quality products and services, not by unethical behaviour by either our employees or business partners. We have a zero tolerance for corruption. We ask you, as Gasum's business partner, not to offer anything of value to our employees, public authorities or third parties that could have an undue influence on the decision-making processes and fair competition. We also prohibit anyone representing us as a distributor, reseller or partner to offer anything of value to influence decision-making processes.

Business decisions shall 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 ask our employees to disclose any personal or professional relationship that may, either directly or indirectly, result in a conflict of interests.

2 COMPETE FAIRLY



We are committed to competing freely in the marketplace with no hidden or unfair advantages. Anti-trust laws regulate the rules on how we can cooperate with our competitors at a horizontal level and with our distributors at a vertical level.

We require free and fair competition and expect you as a Business Partner to compete as forcefully and constructively as possible, while complying with international and national competition law and regulations at all times.

3 RESPECT INTERNATIONAL TRADE OBLIGATIONS



We acknowledge that trade sanctions and other restrictive measures may apply to 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/export of your deliverables.

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 AND REGULATORY EXCELLENCE



A Business Partner is required to have appropriate management systems in place to enable compliance with the requirements in 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, adequate monitoring, control activities, communication and training with regard to the requirements should take place.

5 RESPECT THE ENVIRONMENT



We regard sustainability as a comprehensive approach that is closely connected to our strategy. We respond to climate change challenges through renewable energy, low-carbon products, and circular economy solutions. In our operations, we are committed to energy efficiency and the prevention of environmental degradation. A Business Partner is expected to have a precautionary approach in order to minimize environmental impacts within their value chain.

6 RESPECT HUMAN RIGHTS



Gasum is committed to respecting human rights in line with internationally recognized human rights standards and seeks to avoid complicity in human rights abuses such as child or forced labor.

Fundamental human rights shall be known, understood and respected, and applied 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 agrees on 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, insider 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. We expect Business Partners to collect, use, store and process personal data carefully, responsibly and according to applicable laws and regulations as well as to take adequate security measures.

As a Business Partner, you may request information about personal data from our customer service or 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 cyber security incidents. As our Business Partner we expect you to take a similar proactive approach in respect of health, safety and security.

10 HAVE A FAIR WORKPLACE



Employees are hired and treated 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. Business Partners promote the idea that all employees shall be treated with equal respect and dignity.

Business Partners should strive to pay all workers a wage that meets basic needs and provides a discretionary income in compliance with all national applicable laws.

11 RAISE AND ADDRESS CONCERNS



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

COMPLIANCE AND AUDITING

Business Partners shall provide Gasum with necessary information and allow Gasum or its representatives access to the relevant premises and documentation in order to verify that the Business Partner, its employees, relevant affiliated companies and subcontractors comply with this Code.

Business Partners undertake to provide all necessary information of their management systems, environmental performance and all other relevant information to verify your compliance with this Code as requested by Gasum.



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GASUM

Revontulenpuisto 2 C, PL 21

02100 Espoo

tel. 020 44 71

www.gasum.com