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## HELEN GROUP'S SUPPLIER CODE OF CONDUCT

### ***For Helen, social responsibility is a success factor***

*Energy is an essential part of a well-functioning society, and the Helen Group (hereinafter Helen) plays a key societal role in safeguarding the production and supplies of energy. Helen delivers electricity, heat and cooling, as well as services related to the energy industry to its customers every single day of the year. We develop our operations in compliance with legislation and the Global Compact principles. We take corporate social responsibility into account in the planning, implementation and management of our business operations.*

*The partner network is important to us. We want the suppliers of services and goods to join Helen in committing to responsible action in the economic, social and ecological sense.*

*We take corporate social responsibility into account in the entire procurement process. We aim to take into account the impacts of our products and services on people and the environment throughout their life cycle. Our procurement processes comply with legislation and regulations in accordance with our own Code of Conduct and good business practice. In procurement, we ensure that any conflicts of interest have no impact on the handling of purchases or decision-making. We do not accept bribery in supplier cooperation.*

*In connection with competitive tendering, we request all tenderers to submit an account of the way they observe sustainable development in their operations and, having regard to the nature of procurement, we appreciate consideration of sustainable development in the criteria used in the comparison principles in the tendering process. We also ask for further information on individual purchases with respect to, e.g. sustainable development considerations related to the manufacture, use and disposal of products or the provision of a service. We require our contractors to act responsibly and to comply with the law.*

*We do not accept grey economy in any shape or form. We verify that our suppliers are registered in the trade, prepayment, employer and VAT registers. We also investigate whether the company has paid its taxes and statutory pension insurance contributions, and whether it complies with the collective bargaining agreements for the sector or the key contents of the terms of employment and provides occupational health services. Furthermore, we monitor together with our suppliers that the agreed matters are carried out also with respect to the subcontractors.*

*We monitor the responsibility of our suppliers with audits, if necessary, and are a member of the HSEQ cluster. In the cluster, we assess occupational health and safety issues, environmental responsibility and quality output in partnership with other industrial client companies.*

The following Supplier Code of Conduct is based on the Helen Group Code of Conduct. We require our suppliers to commit to this Supplier Code of Conduct or to similar specifically and jointly agreed supplier code of conduct.

### **Lawful and ethical business conduct**

We require that the supplier

- is responsible for the economic, social and environmental impacts of its activities.

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- complies with the applicable legislation and with our Supplier Code of Conduct for its own and its subcontracting chain's part where they apply to Helen's deliveries. We also require honest, sincere and non-discriminatory action.
- ensures protection of confidential data. This applies especially to personal data.
- duly takes care of payment and other obligations
- complies with the rules and binding regulations concerning open competition and combats grey economy. Competition must be honest and ethical.
- refuses to take part in corruption, including bribery. The supplier must not offer any personal benefits, gifts or similar that deviates from normal hospitality. The supplier must not accept money laundering.

### **Human rights and non-discrimination**

All employees of the Helen Group are entitled to fair treatment and to equal and fair opportunities. We also require the same of the suppliers.

We require that the supplier respects human rights and the principles of non-discrimination and that it complies with the ten principles of the UN Global Compact initiative. These must be complied with in the operations of the supplier and its subcontractors. The supplier must ensure that it is not involved in violations of human rights, and it must tackle action that diminishes human rights and, if necessary, take corrective measures. Employees must have the opportunity to take part in free association and collective bargaining. The supplier must ensure that it is not using forced or penal labour or child labour. The supplier must comply with the applicable legislation in terms of working hours and minimum wages.

### **Environment**

For us, environmental responsibility means, in particular, climate change mitigation, protection of air, water and soil, efficient use of natural resources, and safeguarding biodiversity.

We require that the supplier complies with the applicable legislation and regulations related to environmental issues and minimises any adverse impacts on the environment. We encourage the use of a certified environmental management system and the systematic development of environmentally friendly solutions.

Due to climate change, we all need to commit ourselves to the reduction of greenhouse gases, and, in order to meet the challenges of climate change, we at Helen are developing new solutions for increasingly cleaner energy production and more sustainable consumption. Our target is to achieve carbon neutrality by year 2035. We appreciate it if the supplier has a plan and a target in relation to carbon neutrality. We all share responsibility: it is developed together with our customers and partners, and it has an impact on the whole of society.

### **Occupational health and safety**

The supplier must offer a safe and healthy working environment for its employees and subcontractors and comply with the occupational safety and health legislation and regulations. Employees must be offered training and provided with appropriate protective equipment. Accidents must be prevented, and we encourage documentation and investigation of near misses.

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### **Monitoring and sanctions**

The supplier is required to notify Helen without delay if it notices violations in its own activities or in those of the subcontracting chain with respect to the Supplier Code of Conduct.

Helen has a responsibility survey, and the supplier is required to provide additional information upon request with regard to the Supplier Code of Conduct.

Helen may audit the implementation of this Supplier Code of Conduct by itself or with the aid of a third party. If any violations are detected, the supplier must correct the situation as soon as possible. If the situation is not corrected within the time agreed together with Helen, Helen has the right to terminate the contract and cancel or suspend the work. The violation may also have an impact on future competitive tendering processes.

Approved by Helen's Management Group on 16 June 2020