



EPV ENERGY LTD – SUPPLIER CODE OF CONDUCT

1. INTRODUCTION

EPV's Corporate Responsibility Values

EPV Energy Group (The Company and its Subsidiaries) (EPV) is committed to economic, social, and ecological responsibility in all its operations. Responsible and ethical practices are EPV's founding principles.

EPV focuses on emission-free and reliable energy generation to its shareholders. EPV is the forerunner in low-emission and renewable energy. EPV's main task is to ensure that the supplied electricity and heat remain competitive. In addition to the sustainable energy generation, the well-being and occupational safety of personnel is one of EPV's core values.

Purpose of Code of Conduct

The purpose of this Supplier Code of Conduct (the Code) is to define the basic legal, ethical, employee, and environmental related standards placed on EPV's suppliers. EPV's suppliers shall comply with the principles prescribed in this Code in all their business activities and in relation to their employees and authorities. By requiring suppliers to share EPV's corporate responsibility values, EPV participates in the creation of high industry standards for inter alia climate and human right protection.

Value Chain

EPV's suppliers have an important role in the responsibility effort. In addition to their own activities, EPV's suppliers shall also ensure that their own suppliers, subcontractors, consultants, and business partners participating in the delivery of products, materials, components, or services to EPV comply with the principles of this Code.

EPV also requires that the supplier considers the economic, social, and environmental impacts of its activities on all its stakeholders, proportionate to the supplier's size and footprint.

2. BUSINESS CONDUCT

Compliance with Laws

The supplier shall comply with all laws and regulations applicable to its business operations. The supplier is expected to have adequate compliance policies in place and undertake necessary training for its personnel as to the content of applicable laws.

Conflict of Interest

The supplier shall avoid any situation in which a conflict of interest arises or may arise between the supplier and EPV. The supplier shall immediately disclose EPV all conflicts of interest relating to its activities as EPV's supplier. This includes informing EPV of situations where EPV employee or his/her family member holds a material financial interest, holds a managerial position, or works for the supplier.

Anti-corruption

The supplier shall have zero tolerance towards bribery, extortion, and any other forms of corruption in all business relationships.

The supplier shall establish and maintain policies and procedures to ensure that its representatives do not accept or offer any payments, personal benefits, gifts, or other commitments that deviate from normal hospitality.

Grey Economy

The supplier shall comply with all applicable laws and regulations relating to anti-money laundering, taxation, contractor's obligations and liability when work is contracted out, as well as other legislation combating grey economy. The supplier must duly take care of any payment and related obligation towards its employee, suppliers, and authorities, especially tax authorities.

Trade Sanctions

The supplier shall comply with all applicable laws and regulations on export control and export restrictions, including international trade sanctions imposed by EU, US, UK, or UN authorities.

The supplier shall inform EPV immediately if the supplier itself or its immediate owner, ultimate beneficial owner, director, officer, or representative becomes subject to international trade sanctions or restrictions.

Competition law

The supplier shall compete fairly and in accordance with applicable competition laws and regulations. These laws prohibit such formal or informal understandings, agreements, or arrangements among companies that unfairly restrict competition.

The suppliers shall have zero-tolerance for competition law infringements. The suppliers shall also refrain from exchanging current, recent, or future pricing or other confidential market information with its competitors.

The supplier shall not in any other way illegally restrict competition for example in its supply or distribution relationships or, if applicable, by abusing dominant position. EPV supports green procurements.

Cybersecurity and Data Protection Requirements

The Supplier shall ensure the appropriate processing of EPV's personal data and maintain a high level of cybersecurity for data, systems, and services. The Supplier shall comply with the requirements of the EU NIS2 Directive and the Finnish Cybersecurity Act implementing it, in all services and products provided to EPV.

The Supplier shall have documented procedures for identifying and managing its cybersecurity risks, as well as appropriate technical and organizational security measures, including strong authentication, access control, data encryption, up-to-date software patches, vulnerability management, secure remote connections, and adequate backup and recovery procedures.

The Supplier shall notify EPV without undue delay, and in any case no later than within 24 hours, of any cybersecurity incidents or vulnerabilities that may affect EPV's data, systems, or supply chain.

EPV has the right, where necessary, to audit or have audited the Supplier's cybersecurity-related practices and controls. In addition, the Supplier shall ensure that its subcontractors comply with at least the same cybersecurity requirements as the Supplier itself, and that the Supplier's personnel have received adequate training on information security and the handling of confidential information.

3. SOCIAL RESPONSIBILITY

Respect for Human Rights

The supplier is expected to support and respect internationally proclaimed human rights, for example those set out in the International Bill of Human Rights.

The supplier shall respect the rights and privacy of each individual and treat everyone with dignity and respect. The supplier shall implement mitigation actions and provide corrective measures in the event of human right violations.

Health and Safety

EPV only engages suppliers who commit to EPV's goal of building a working environment in which occupational accidents do not occur.

The supplier shall provide its employees with safe, healthy, and secure working environment in compliance with all laws and regulations applicable to its operations. Occupational accidents must be prevented as far as possible.

The supplier shall ensure that its employees are provided with appropriate health and safety information, training, and equipment.

The supplier's employees shall never work under the influence of alcohol or illegal drugs on the site of EPV.

Terms of Employment

The supplier shall clearly define its employees' terms of employment. The supplier shall ensure that the compensation paid to the employees complies with all applicable wage laws, possible collective agreements, or industry standards, and shall always compensate employees fairly.

The working hours and holidays shall comply with applicable national laws.

Fair treatment, Non-discrimination, and Harassment

Suppliers must treat everyone fairly. Any discrimination based on gender, ethnic or social origin, religion, political or any other opinion, marital status, pregnancy, or any other similar distinction not inherent to the requirements of the work is prohibited.

The supplier shall ensure that no worker is subjected to any physical, sexual, or verbal abuse, or other unlawful harassment.

Health and Well-being

EPV encourages the supplier to adopt a proactive approach to occupational health and well-being and to discuss matters related to health, well-being, and coping at work with its personnel.

Freedom of Association

The supplier shall recognize and respect its employees' right to organize freely and bargain collectively.

Forced Labor

The supplier shall refuse to make anyone work against his or her will. The suppliers shall not use under any circumstances forced or compulsory labor. The supplier shall not make employees work under a threat of penalty or mental or physical coercion.

Child Labor and Young Workers

The supplier shall not employ under any circumstances children who are under the legal minimum age for the employment.

The suppliers shall protect workers under the age of 18 from work which, by its nature or the

circumstances in which it is carried out, is likely to endanger their health, safety, or morals.

4. ECOLOGICAL RESPONSIBILITY

Environmental Protection

The supplier shall make all reasonable efforts to protect the environment, combat climate change and take biodiversity into account, for example in land use. EPV encourages the suppliers to have a clear plan and a target on carbon neutrality.

In addition to the efforts to protect the environment, supplier shall comply with all applicable laws and regulations and shall obtain, maintain, and comply with all environmental permits, licenses, and registrations necessary for its operations.

Environmental Impact and Adoption of Measures

The supplier shall make a reasonable effort to identify environmental impact and footprint of its operations and to undertake necessary mitigation measures. The supplier is expected to monitor, control, minimize, and appropriately treat emissions and pollutants and other waste generated from its operations.

The supplier shall strive to implement appropriate and adequate greenhouse gas reduction measures such as improving energy efficiency, using renewable energy, as well as eliminating, reducing, and recycling waste.

5. MONITORING AND REPORTING

Monitoring

The supplier shall monitor its compliance with the Code. It is also the supplier's responsibility to monitor its own value chain and to take the necessary measures to ensure that the rules of conduct are followed not only in its own operations but also in its value chain, so that the supplier's own suppliers, subcontractors, consultants and business partners involved in the delivery of products, materials, components or services to EPV comply with the principles of these rules of procedure.

The supplier shall notify EPV without undue delay if it becomes aware of any infringement of the requirements of the Code.

Reporting

Upon request, the supplier shall provide EPV access to all relevant information and documents to verify the supplier's compliance with the Code. Should EPV have reasonable grounds to believe that the supplier is in breach of the Code, EPV has right to audit, either itself or through a third-party auditor, the supplier's relevant premises to validate the compliance with the Code.

Breach of Code

If EPV reasonably considers that the supplier has materially breached the Code, the supplier must remedy the situation as soon as possible. If the situation is not remedied within the time agreed together with EPV, EPV has the right to terminate the contract and cancel or suspend the work.

Applicability

By agreeing to work with EPV the supplier confirms that it and its affiliates comply with the Code. An "affiliate" refers in this Code to a company that is controlled by the supplier, controls the supplier or is under common control with the supplier. The supplier shall ensure that its suppliers, subcontractors, consultants, and partners comply with the principles of the Code.