



**POHJOLAN VOIMA**

## **RESPONSIBLE SUPPLIER**

Pohjolan Voima Code of  
Conduct for Suppliers



Approved 12 December 2024

# 1 RESPONSIBILITY IN NETWORKS AND STAKEHOLDER RELATIONS

Pohjolan Voima strives for a carbon-neutral Finland. Our aim is to take into account biodiversity in all of our activities and reduce the emissions from our production in accordance with the principle of continuous improvement. We are committed to long-term efforts to mitigate the environmental impacts of hydropower. Responsible conduct is part of our strategic thinking: We create decisive power to strengthen competitiveness and contribute to a better tomorrow. This includes elements of responsibility: economic, social, and environmental responsibility. Our responsibility is based on essential aspects of our operations and the company’s values: skilfully, reliably, together.

The responsible business practice of Pohjolan Voima is guided by the Code of Conduct, approved by the Board of Directors, and the four UN Sustainable Development Goals selected for Pohjolan Voima’s responsibility programme, where we have the greatest impact.

We operate in networks with our owners, partners and subcontractors. It is important to us that our contract and cooperation partners are aware of their role in Pohjolan Voima’s responsible value chain and commit to responsible operating principles and their development. We do not tolerate the use of forced or child labour in any part of our value chain.

This Code of Conduct for Suppliers (The “Code”) describes the basic requirements for responsible business conduct required from contract and cooperation partners.

# 2 PRACTICE

As our contract and cooperation partner, we expect you to comply with all applicable laws, permits, and other binding requirements related to your operations and to act in accordance with the principles of this Code, aiming for responsible management of economic, social, and environmental issues and promoting biodiversity. You also ensure that your own contract and cooperation partners comply with these principles.

The applicable legislation and policies include principles that correspond with the internationally recognized Ten Principles of the UN Global Compact initiative regarding human rights, labour standards, environmental protection, and anti-corruption.

# 3 CONFLICTS OF INTEREST

You are only involved in business relationships that comply with anti-bribery laws and regulations. You do not accept or offer gifts or benefits that exceed reasonable customary business or employment-related hospitality or that might appear to lead to a conflict of interest. You comply with all anti-money laundering laws.

## OUR CORPORATE SUSTAINABILITY THEMES



We create decisive power to strengthen competitiveness and contribute to a better tomorrow.



**Skilfully–Reliably–Together**

- Sustainability themes and key aspects by Sustainability themes**
- Carbon neutral and sustainable energy
    - Clean energy production and climate
    - Biodiversity and status of water systems
  - Affordable and reliable energy
    - Security of electricity and heat supply
    - Power plant and infrastructure lifecycle management
    - Reliability as a partner
  - Safe working environment and wellbeing of employees
    - Proactive safety
    - Inspiring workplace for top experts
  - Sustainability in networks and stakeholder relations
    - Ensuring sustainable operations in throughout the value chain and in partnerships
    - Interaction with stakeholders

## 4 ENVIRONMENTAL AND ENERGY EFFICIENCY

You identify and assess the environmental impacts and risks of your operations and minimize the negative impacts on the environment, climate, and biodiversity. If you produce or supply biomass fuels, you can demonstrate their origin and supply chains and that the biomass fuels are sustainably produced in accordance with sustainable forestry and legislation. Acting in accordance with good environmental and energy efficiency practices and their continuous improvement are part of your responsible conduct.

## 5 SUBCONTRACTING

Unless otherwise agreed in writing, you do not have the right to subcontract obligations included in the contract, and even then, you must limit the subcontracting chain to only the second tier. Further subcontracting is possible only for a justified reason and with Pohjolan Voima's written consent. You are liable for the performance of your subcontractors as for your own performance and ensure that subcontractors act in accordance with this Code.

## 6 SAFE WORKING ENVIRONMENT AND EMPLOYEE WELLBEING

You ensure a safe working environment for your employees or other persons within your sphere of influence and that they receive the necessary information related to occupational safety, as well as adequate training and equipment. You comply with all safety requirements.

You prevent health hazards caused by work and promote equal treatment and comply with fair employment practices: wages and working hours must be at least at the level required by applicable laws and regulations and generally followed in your industry. You continuously develop your operations to improve the working environment and occupational safety.

## 7 PROTECTING INFORMATION

You protect Pohjolan Voima's confidential information from unauthorized access, destruction, alteration, or disclosure with necessary technical and organizational measures. You handle personal data in accordance with applicable data protection legislation.

You comply with basic technical and other measures to ensure information security (including cybersecurity) of systems, programmes, and services based on general good security practices and risk assessments. You ensure the availability, integrity, and reliability of information, also considering the security of management and maintenance work. You are prepared to maintain operations in serious exceptional situations (continuity management).

Pohjolan Voima has the right, if necessary, to require security clearance in accordance with the Security Clearance Act (2014/726) for persons involved in the supplier's service. Pohjolan Voima is responsible for applying for security clearances and the costs incurred.

## 8 COMPLIANCE WITH THE CODE

You must allow Pohjolan Voima to audit your operations and, upon request, provide information on compliance with the requirements of this Code. Pohjolan Voima may carry out the audit itself or with the assistance of a third party.

If you do not meet the requirements of this Code, we support the development of your responsibility with applicable monitoring practices and by sharing our own experiences and developing operating methods in cooperation with you. If you materially violate this Code, we reserve the right to terminate our cooperation and all related contracts.

If you suspect or observe activities contrary to this Code, we urge you to report it to Pohjolan Voima without delay.

## OUR SUSTAINABLE DEVELOPMENT GOALS



We produce electricity and heat for our customers by means of hydropower, thermal power and nuclear power. We are committed to carbon neutrality. Ensuring that our production plants operate reliably and efficiently is a prerequisite for reaching this goal.



The relevance of our work, occupational health and safety, as well as wellbeing at work are important to the employees of Pohjolan Voima. In addition to carbon neutrality, relevance includes competitiveness and resource efficiency.



Our operations influence the environment. Themes important to us include biodiversity, sustainable use of forests and freshwater ecosystems, including migratory fish.



Our networked operating method is an integral part of our operating model. It is also part of the expertise of each Pohjolan Voima employee. We promote sustainable development together with our partners.

**POHJOLAN VOIMA OYJ**

Mikonkatu 7 A5

P.O.Box 40, 00101 Helsinki

[www.pohjolanvoima.fi](http://www.pohjolanvoima.fi)

**DECISIVE  
POWER.**