



**POHJOLAN VOIMA**

## **RESPONSIBLE SUPPLIER**

Pohjolan Voima Code of  
Conduct for Suppliers



**2026**

## 1 RESPONSIBILITY IN NETWORKS AND STAKEHOLDER RELATIONS

Pohjolan Voima works for a carbon-neutral Finland. Our aim is to take into account biodiversity in all our operations and to reduce the emissions of our production in accordance with the principle of continuous improvement. We work persistently to mitigate the environmental impacts of hydropower. Responsible operations are a part of our strategic outlook: We create decisive power to strengthen competitiveness and for a better tomorrow. This includes all the elements of responsibility: economic, social, and environmental responsibility. Our responsibility is based on the aspects that are the most important for our operations and our company values: skillfully, reliably, together.

Pohjolan Voima's responsible business conduct is guided by the Pohjolan Voima Code of Conduct, approved by the Board, as well as the UN Sustainable Development Goals from which we have identified four for our sustainability program, that are most relevant to us.

We operate in a project-based manner within networks, both with our owners and our partners and subcontractors. It is important for us that our contractual and cooperation partners are aware of their role in Pohjolan Voima's value chain and are committed to sustainable operating principles and their development. We do not tolerate the use of forced or child labour in any part of our value chain.

## OUR CORPORATE SUSTAINABILITY THEMES

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



Sustainable production on market terms



Competitive advantage by balancing power capability and timeliness



Top expert in asset management

Skilfully–Reliably–Together

This Code of Conduct for Suppliers (the "Code") describes the basic requirements for responsible business expected from contractual and cooperation partners.

## 2 OPERATING PRACTICE

We expect you, as our contractual and cooperation partner, 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. The aim is responsible management of economic, social, and environmental matters, the promotion of biodiversity, and the respect of human rights. You must also ensure that your own contractual and cooperation partners comply with these principles.

Applicable legislation and operating principles include the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

## 3 CONFLICTS OF INTEREST

You shall engage only in business relationships that comply with anti-bribery laws and regulations. You shall not accept or offer gifts or benefits that exceed reasonable and customary business hospitality or could appear to create a conflict of interest. You must comply with all laws prohibiting money laundering.



### 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 must identify and assess the environmental impacts and risks of your operations and minimise any negative impacts on the environment, climate, and biodiversity. If you produce or supply biomass fuels, you must be able to demonstrate their origin and supply chains, and that the fuels are sustainably sourced in accordance with sustainable forestry and legislation. Operating in line with good environmental and energy efficiency practices and their continuous improvement are part of your responsible operating practices.

## 5 SUBCONTRACTING

Unless otherwise agreed in writing, you do not have the right to subcontract tasks included in the agreement. If subcontracting is allowed, you must limit the subcontracting chain to the second tier. Further subcontracting is only possible with justified reason and written approval from Pohjolan Voima. You are responsible for the actions of subcontractors as if they were your own and for ensuring that they comply with this Code.

## 6 SAFE WORKING ENVIRONMENT AND EMPLOYEE WELLBEING

You must ensure a safe working environment for all persons in your service or under your influence and provide them with the necessary safety-related information, adequate training, and equipment. You must comply with all safety requirements.

You must prevent health hazards caused by work and promote equal treatment and fair employment practices: wages and working hours must meet at least the requirements of applicable laws, regulations, and generally accepted industry standards. You must continuously develop your operations to improve the working environment and safety.

## 7 CORRECTIVE MEASURES FOR NEGATIVE HUMAN RIGHTS IMPACTS

If your operations cause or contribute to harmful impacts on the well-being of your employees or local communities, you commit to actively correcting the situation. If international human rights principles and local legislation conflict, you must apply the law in a manner as consistent with human rights and international norms as possible.

## 8 PROTECTING INFORMATION

You must protect Pohjolan Voima's confidential information from unauthorised access, destruction, alteration, or disclosure through appropriate technical and organisational measures. Personal data must be processed in accordance with applicable data protection laws.

You must implement at least basic technical and other measures to ensure the security of systems, software, and services (including cybersecurity), based on good security practices and risk assessments. You must ensure the availability, integrity, and reliability of data, including the security of management and maintenance tasks. You must be prepared to maintain operations in severe exceptional situations (continuity management).

Pohjolan Voima has the right to require security clearances (pursuant to the Security Clearance Act 2014/726) for persons involved in providing supplier services. Pohjolan Voima is responsible for applying for security clearances and related costs.

## 9 COMPLIANCE WITH THE CODE

You commit to full compliance with this Code as part of the main contract. We support the development of your responsibility through dialogue between the parties, for example in regular meetings, and, if considered necessary, through site-specific audits. Audits are conducted by internal or external independent

auditors. You commit to responding accurately and within a reasonable timeframe to questionnaires related to the Code.

We consider violations of laws and this Code, as well as failure to take corrective actions, as a breach of contract that may lead to suspension or termination of cooperation or the business relationship. Breaches are subject to the main

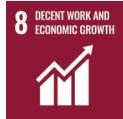
contract's provisions regarding contractual liability.

If you suspect or detect misconduct or activities that violate this Code, we encourage you to report it immediately to Pohjolan Voima via the reporting channel: <https://www.pohjolanvoima.fi/en/report-misconduct>

## 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**

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**DECISIVE  
POWER.**