

Supplier Code of Conduct (in English)			Page 1 (6)
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Author(s): Nordgren Jonna		Approver: Suutari Eeva	

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Supplier Code of Conduct (in English)

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1 General

Sustainability is a central part of the Pori Energia Group (hereinafter referred to as Pori Energia), consisting of Pori Energia Oy and its subsidiaries Pori Energia Sähköverkot Oy and Tuulia Energy Oy. We promote sustainability throughout our entire value chain – from the provision of services to the choices made by our customers. Pori Energia complies with Finnish law, all other applicable regulations and requirements, as well as international human rights principles and labor standards. We are committed to the United Nations Guiding Principles on Business and Human Rights as well as the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Our operations are based on trust, which connects us with our customers and suppliers. We respect the equality and diversity of all people and do not tolerate any form of discrimination, harassment, or inappropriate behavior.

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All Pori Energia employees and partners have the right to be treated fairly and with respect. We promote an equal and safe working environment where everyone has the opportunity to develop, contribute, and be heard. We expect the same commitment from all our partners and suppliers.

This Code of Conduct sets forth the minimum requirements that suppliers must adhere to in their own operations and supply chains, alongside applicable laws and regulations.

All our employees are committed to following the principles and practices of our Code of Conduct. Likewise, we expect our suppliers to act responsibly. "Supplier" refers to all parties providing products or services to Pori Energia or acting on behalf of Pori Energia – including suppliers and subcontractors as well as their subcontracting chains.

2 Laws and Ethical Conduct

Our suppliers must comply with all laws, regulations, and international obligations applicable to their operations. These include, among others, provisions relating to labor law, health and safety, environmental protection, as well as the prevention of money laundering and corruption. We require our suppliers to adhere to and promote ethical business principles. This means acting with honesty and transparency and making decisions free from undue influence or prejudice. We expect our suppliers to uphold these values in all circumstances. Suppliers must refrain from any actions or relationships that could potentially jeopardize Pori Energia's reputation. Compliance with legislation and ethical principles not only protects the reputation of our suppliers and Pori Energia but also strengthens our shared responsibility and mutual trust.

3 Description of Activities

Our suppliers must promote sustainability throughout their entire supply and value chain and ensure that their subcontractors as well as providers of goods and services comply with the principles and requirements set forth in this Code of Conduct. Ensuring responsibility at all stages of the chain is essential for sustainable and ethical business.

Our suppliers are required to implement appropriate due diligence processes to monitor and manage subcontracting relationships. In addition, we encourage suppliers to provide training and workshops to their subcontractors and providers in order to ensure the implementation of responsible business practices.

Responsible business also requires building and maintaining trust with various stakeholders. We encourage our suppliers to actively engage with, for example, local communities and relevant organizations. It is important to recognize the expectations and concerns of different stakeholders and to respond to them appropriately. Before cooperation begins, it must be ensured that the planned measures and strategies genuinely support business value and create a positive impact.

4 Transparency and Fair Competition

Our suppliers must operate transparently in all stages of business operations. Transparency and open reporting are essential for ensuring responsibility, maintaining trust, and supporting informed decision-making. Our suppliers are required to provide Pori Energia with all necessary information, when

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requested, in accordance with applicable laws and regulations, so that we can meet our own reporting requirements and obligations.

Our suppliers must conduct business in accordance with the principles of fair, honest, and open competition. We are committed to the principles of open and fair competition and require our suppliers to act in the same way. Practices that distort competition, mislead, or are otherwise unethical — such as price-fixing, market sharing, bid rigging, or other forms of collusion prohibited under competition laws — are strictly forbidden.

Our suppliers must exercise particular care when interacting with Pori Energia’s competitors. Any cooperation that could harm or undermine the principles of fair competition is prohibited. This includes, for example, discussions or agreements with competitors regarding pricing, customer information, marketing plans, or other sensitive data.

5 Conflicts of Interest

We require our suppliers to act responsibly and refrain from any situations that could create – or appear to create – a conflict of interest in relation to Pori Energia or our employees. Business impartiality is essential to maintaining the reliability and reputation of both our company and our partners.

A conflict of interest arises when a supplier’s personal interests or external commitments are, or appear to be, in conflict with the interests of Pori Energia. Such conflicts of interest may include, for example, personal or financial interests that could affect the supplier’s ability to act objectively or make independent decisions.

A conflict of interest may arise, for example, if a supplier invites a Pori Energia employee responsible for procurement to an expensive trip or event to strengthen the business relationship, or if the supplier personally or financially benefits from a close relationship with a Pori Energia employee who participates in decision-making concerning that supplier. Such situations may affect, or appear to affect, whether decisions regarding Pori Energia matters are made fairly and independently. It is important that the supplier recognizes these situations and promptly reports them to the responsible person at Pori Energia. Open and transparent communication plays a key role in resolving conflicts of interest.

To identify potential conflicts of interest, our suppliers must inform us if:

- an employee, family member, or other relevant individual connected to the supplier has a relationship with one of our employees who has decision-making authority regarding the supplier’s matters; or
- any Pori Energia’s employee is involved in the supplier’s business.

Even the appearance of a conflict of interest can be harmful. Therefore, our suppliers must disclose in advance any affiliations or activities that could give rise to an actual or perceived conflict of interest.

6 Confidential Information and Data Protection

Our suppliers must protect the confidential information of Pori Energia and Pori Energia’s customers. Such information may only be used for the provision of agreed services. The sharing or use of

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confidential information for any other purpose always requires prior written consent from Pori Energia. Unauthorized use, copying, or disclosure of such information is strictly prohibited.

If a supplier's personnel process confidential information of Pori Energia or its customers, a separate data processing agreement must be concluded before the processing begins. Protecting this information is of the utmost importance. Our suppliers must process personal data lawfully and responsibly, respecting the privacy and rights of individuals. The processing of personal data must be transparent to the data subjects, and personal data may only be used for the purposes that have been communicated in advance. Responsible processing of personal data requires appropriate safeguards: suppliers must implement both technical and organizational measures to ensure integrity, confidentiality, and security of the data.

7 Corporate social responsibility

7.1 Human rights

Our suppliers must respect, protect, and promote all internationally recognized human rights principles as well as equality in their operations. In addition, suppliers are required to commit to fair employment practices.

7.2 Equality and non-discrimination

Our suppliers must provide equal opportunities to all employees and treat them fairly regardless of ethnic background, gender, disability, sexual orientation, religion, political opinions, or other personal characteristics. Suppliers must also ensure that no one is discriminated against on the basis of the above-mentioned factors or characteristics.

7.3 Forced labour

Our suppliers must under no circumstances use forced labor or any other form of involuntary work, including human trafficking. All work must be based on free will, and employees must have the right to terminate their employment contract by giving reasonable notice.

7.4 Child labour

Our suppliers are not permitted to employ, either directly or indirectly, children who are under the legal minimum working age. Exceptions may only be allowed if they are based on guidelines approved by the International Labour Organization (ILO), and even then, suppliers must exercise particular caution and due diligence in compliance with ILO Convention No. 138 on child labour.

7.5 Working hours

Our suppliers must comply with all applicable local and international laws, regulations, and industry practices regarding working hours, overtime, rest periods, and annual leave. Work-life balance is a key element of employee well-being and motivation. While workloads may occasionally increase, employees must not be subjected to unreasonably long working hours. We encourage suppliers to provide appropriate and, where necessary, flexible working arrangements, such as flexible hours, part-time work, or remote working opportunities.

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7.6 Compensation

Our suppliers must commit to fair compensation. Compensation must meet at least the requirements of law or industry standards – whichever is higher. Deductions are permitted only when lawful and must never be used as a disciplinary measure. While compensations are primarily to be paid in money, the method of payment must comply with local laws and practices.

7.7 Freedom of association

Our suppliers must respect freedom of association and the right to collective bargaining as fundamental rights of workers. Employees have the right to freely join or not join trade unions or other organizations, and to participate in negotiations without fear of retaliation, harassment, or interference. This also includes engaging in good-faith negotiations with representatives chosen by employees on the key terms of employment.

8 Occupational Health, Safety, and Wellbeing

Our suppliers must establish and maintain practices and a work environment where employees' health and safety are not put at risk. Safeguarding employee well-being and occupational safety is an essential part of responsible business conduct. Employees must be provided with the necessary protective equipment and given adequate training on safety procedures and the proper use of equipment. Workforce diversity must be taken into account, and suppliers must be prepared to make reasonable accommodations to support individual needs, such as those of employees with disabilities or special requirements.

Our suppliers must carry out regular assessments to identify potential occupational health risks, hazards, and areas for improvement. Identified risks must be addressed with preventive and corrective measures. To foster a culture of safety awareness, suppliers are expected to maintain open and continuous dialogue between management and employees or their representatives. This cooperation is essential for developing and sustaining a safe and healthy working environment and practices.

9 Environmental Responsibility and Energy Efficiency

Our suppliers must commit to reducing the negative and enhancing the positive impacts of their operations on climate, nature, and energy efficiency – both in their own activities and throughout the value chain. In addition, suppliers must commit to complying with all applicable national and international environmental laws, regulations, and principles. The production of products and raw materials must not result in deforestation, forest degradation, or other forms of environmental harm. Supply chains must also be transparent, and the origin of raw materials must be traceable.

Suppliers must identify, assess, and report the material environmental impacts of their operations, as well as prevent and mitigate the related risks. We encourage our suppliers to adopt a certified environmental management system or another documented approach to managing environmental matters.

10 Reporting Violations (Whistleblowing) and Audits

If a supplier identifies activities within its own supplier or subcontractor network that conflict with this Pori Energia Code of Conduct, or suspects a violation related to products or services delivered to Pori Energia, it must report this immediately. Reports can be submitted anonymously through the

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whistleblowing channel (link coming soon). All reports will be investigated, and whistleblowers will be protected from discrimination or other negative consequences when the report is made in good faith.

Repeated or serious violations are considered a material breach of contract and may result in the termination of cooperation. Pori Energia reserves the right to conduct audits, either directly or through a third party, to ensure compliance with the requirements. Audits are carried out in collaboration with the supplier, who must enable inspections at, for example, its premises. If violations are detected and not remedied within the agreed timeframe, Pori Energia may terminate the business relationship.

11 References, Appendices, Records

Reference/Appendix/ Recording number	Name
	the UN Guiding Principles on Business and Human Rights
	the International Labour Organization (ILO) fundamental principles and rights at work

12 Inspection markings

Author/ Date	Reviewer/ Date	Approver	Comment
Nordgren Jonna /		Suutari Eeva /	Approved by the Board of Directors of Pori Energia Group on October 30, 2025.