

23.6.2021

## ENERSENSE SUPPLIER CODE OF CONDUCT

### 1 Introduction

#### 1.1 Background and purpose

Enersense International Plc and its group companies (jointly “**Enersense**”) are committed to observing the highest requirements of legislation and ethical principles in all of their operations.

This Supplier Code of Conduct specifies the principles that Enersense’s suppliers shall follow in their operations. The Code of Conduct defines Enersense’s approach to ethical business practices, human and work-related rights, and environmental values. The jointly agreed operating principles promote profitable business operations and a culture of responsibility and integrity, prevent unlawful and unethical practices, and strengthen confidence in our stakeholders.

Every Enersense supplier must always comply with this Code of Conduct, and this Code of Conduct is an inseparable part of all agreements between the supplier and Enersense. However, in addition to this Code of Conduct, suppliers must always observe requirements of local legislation, so that this Code of Conduct always constitutes the minimum requirements for the operations of Enersense’s suppliers.

#### 1.2 Area of application

This Code of Conduct is applied to Enersense’s suppliers in all countries in which Enersense operates.

In this Code of Conduct, “supplier” refers to all parties that supply products or services to Enersense directly or indirectly or which provide products or services in Enersense’s name. Suppliers must ensure that their own suppliers and subcontractors comply with this Code of Conduct or the supplier’s own, similar code when providing products or services to Enersense.

### 2 Business operations

#### 2.1 Compliance with laws and regulations

In all business operations, suppliers must carefully abide by all applicable laws, statutes, orders and governmental instructions as well as ethical business principles. Local requirements imposed by legislation must be complied with even when their requirements are stricter than the requirements set out in this Code of Conduct.

Suppliers must observe due care to prevent and detect any unlawful activity and promote a culture that

encourages ethical business and compliance with laws.

If any unlawful or unethical action is detected in a supplier’s business operations, the supplier must take the measures necessary to react to such action appropriately and to prevent any further occurrence of similar action.

The supplier must have in place an appropriate management system and internal guidelines, risk management procedures and related training and resources. These must be in the correct proportion to the scope and nature of the supplier’s business operations.

#### 2.2 Fair competition

In their operations, suppliers must promote free and fair competition in the market and comply with applicable legislation on competition. Suppliers shall not take part in measures aimed at preventing, restricting or distorting competition. Suppliers may not be involved in any agreement on artificially high or low prices, sharing of markets or customers, and they may not exchange confidential information with competitors in a prohibited manner.

Suppliers must comply with applicable competition legislation and other applicable guidelines on competition law, and refuse to discuss or agree on prices, market shares or other activities that prevent, restrict or distort competition in the marketplace with competitors.

#### 2.3 Prohibition of bribery and corruption

Enersense observes absolute zero tolerance regarding bribery and corruption. Bribery and corruption are unlawful practices and may cause serious legal consequences and damage Enersense’s reputation and the values we represent.

Suppliers may not accept or engage in any kind of bribery or corruption that is direct or practised through third parties or intermediaries in any of their business operations. Suppliers may not under any circumstances, by themselves or through third parties, promise or offer money or any other valuable benefits to anyone with the intention of seeking illegal business gains or influencing decisions, nor may they for these purposes request, accept or receive money or other valuable benefits from other people. Principles of transparency, equity and independence must be observed when offering and receiving business gifts, presents and entertainment.

**Making a zero-emission society a reality.**

2.4 *Conflicts of interest*

A conflict of interest means that a supplier's or its employee's financial or other personal circumstances do or may affect the said party's loyalty, professional discretion or management of duties. Suppliers must avoid business transactions and situations that can cause conflicts of interest. Suppliers may not seek personal benefit by taking advantage of their position or Enersense's property, information or business opportunities.

2.5 *Protection of property and privacy*

Enersense's know-how, other intellectual property rights and confidential information (including trade secrets) are valuable assets of the company and must be protected. For Enersense's successful business operations and reputation, it is also crucial to protect confidential information received from our customers and other stakeholders in an adequate manner.

Suppliers must treat confidential or sensitive information obtained in the strictest of confidence and respect other parties' intellectual property rights. Suppliers must comply with practices and guidelines that protect Enersense's property against damage and other external threats, and ensure that Enersense's or third parties' confidential information is not disclosed without authorisation. Suppliers must take adequate protective action to prepare for information security threats related to their operations.

The collection and processing of personal data must always be based on purposes permitted by law, and this must be done confidentially, in compliance with applicable laws.

Suppliers must have an appropriate business continuity plan.

2.6 *Purchasing and relationships with partners*

Suppliers should only deal with reputable and reliable partners. Suppliers must verify the backgrounds of their suppliers and other partners and their business operations before starting any cooperation.

Suppliers may not take part in money laundering, the financing of terrorism or criminal activity in any form, and they must abide by all applicable sanction programmes.

**3 People**

3.1 *Safe and healthy working conditions*

Enersense is committed to providing all of its employees and suppliers with a safe and healthy work environment. We believe that every occupational

accident is preventable. Our principle is that we do not compromise on occupational safety.

Every supplier is obliged to ensure their own and other people's safety, and any shortcomings in occupational safety detected must be reported immediately.

Suppliers must comply with laws on occupational safety, Enersense's requirements for occupational safety, and other safety and health instructions. Suppliers must notify Enersense of all shortcomings detected that are related to safety and health instructions or protective measures.

Suppliers must specify individuals responsible for matters of occupational health and safety in the organisation.

Suppliers must promote a proactive occupational safety culture, provide induction, and ensure absolute compliance with occupational safety legislation and safety instructions as well as training related to these. Suppliers must also ensure that appropriate action is taken after any accidents by analysing, identifying and distributing preventive and replacement measures.

3.2 *Terms of employment*

The terms of employment of suppliers' employees must meet at least the minimum requirements imposed in applicable national labour legislation, collective agreements and international treaties. Employees' pay and terms of employment shall be fair and reasonable.

3.3 *Respect for human and work-related rights*

Suppliers must respect internationally recognised human and work-related rights in all of their operations and promote their implementation. Enersense does not condone any form of violation of human and work-related rights.

Suppliers must respect employees' right to organise, join or not join associations and trade organisations, and to collectively negotiate with the employer.

Suppliers may not accept any kind of forced labour or use of child labour.

3.4 *Equal opportunities, non-discrimination and prevention on inappropriate treatment*

Equal treatment of all employees is one of Enersense's key principles. We aim to promote open, direct and respectful communication among all employees.

Suppliers may not discriminate against anyone based on ethnic origin, age, gender, family situation, sexual orientation, conviction, functional limitations, political views or other similar factors. Suppliers may also not accept any form of bullying or harassment, such as violence, sexual harassment, inappropriate punishments or any kind of abuse. Suppliers must undertake to guarantee an atmosphere free from harassment and violence for their employees.

#### 4 Environment

Enersense is involved in all phases of the energy sector's life cycle, and we believe that our services are highly relevant on society's journey towards increasingly sustainable development.

Suppliers must in cooperation with their employees, customers and suppliers aim to reduce the environmental impact of their operations, and act proactively in environmental matters by, e.g., constantly measuring and evaluating environmental effects.

Suppliers must continuously improve the eco-friendliness of their services by actively seeking means to reduce harmful effects on the environment throughout the life cycle of the services. Such environmental impact should be reduced through appropriate selection and use of materials, processes, and by minimising the amount of waste and emissions generated during operations.

Suppliers must comply with legislation related to the environment, environmental permits and other applicable orders, and Enersense's guidelines. Suppliers must aim to reduce or eliminate the amount of waste generated or other harmful impact on the environment, for example, by recycling material or waste.

Suppliers must ensure that their employees are aware of and trained on environmental requirements.

Suppliers must aim to actively prevent environmental damage and process any environmental violations and complaints systematically, and to communicate these to all parties concerned, including Enersense if the effects extend to Enersense.

#### 5 Violations and reporting

Enersense or a third party designated by Enersense has the right to supervise compliance with this Code of Conduct and to audit the supplier in relation to this.

If Enersense notices that the supplier does not abide by this Code of Conduct, Enersense will notify the supplier of the matter. The supplier must take corrective measures indicated in Enersense's

instructions without delay and demonstrate their implementation in an adequate manner. However, Enersense has the right to cancel orders made, suspend future orders and/or cancel the agreement with the supplier if the supplier has violated this Code of Conduct. Even if the agreement of which this Code of Conduct constitutes a part includes provisions on termination of the agreement, the supplier understands that violation of this Code of Conduct can be regarded as a material breach of contract that entitles Enersense to terminate the supplier's agreement.

If the supplier notices or suspects that the provisions of this Code of Conduct are being violated, the supplier must immediately report the matter to Enersense's ethical channel (whistleblowing channel) to the email address [ethics@enersense.com](mailto:ethics@enersense.com) or by mail to the address Enersense International Plc, SVP, Legal, Konepajanranta 2, 28100 Pori, Finland, or contact another whistleblowing channel in use at Enersense.

The supplier must also ensure that its employees, suppliers and other key stakeholders have at their disposal a reporting channel for reporting any violations of ethical guidelines and rules.