



CODE OF CONDUCT FOR PARTNERS

PLUGIT FINLAND OY

[11.08.2023], updated on web [01.09.2023]



1. Purpose

This Code of Conduct for Plugit Finland Oy's (**Plugit, we**) partners (the **Code**) sets rules for our partners on the standards of responsible business practices which Plugit requires all its partners to comply with, regardless of the value and form of cooperation. We require that all partners who cooperate with Plugit act responsibly and comply with the Code when cooperating with Plugit.

Suspected breaches of the Code shall be reported immediately to the contact person or a representative of the management of Plugit. The suspected breach can also be reported anonymously via our reporting channel. Reports regarding suspected breaches will be handled confidentially.

In case unlawful or unethical conduct or conduct against internal guidelines is recognized, Plugit will take all necessary actions to react to such conduct in an appropriate way, and to ensure that similar kind of conduct can be prevented in the future. Breaches of the Code or other violations of responsible business practices may lead to the termination of the contractual or cooperation relationship.

2. Applicability

By committing to business or cooperation with Plugit, the partner confirms that it and its affiliates and their representatives comply with this Code. In this Code, affiliates refer to all entities which Plugit's partner controls, which control Plugit's partner, or who are under common control with Plugit's partner.

3. Code of Conduct

3.1 Compliance with legal obligations and instructions

Plugit requires that all its partners act in an ethical manner and in compliance with applicable laws. Our partners shall comply with applicable national and international laws, acts, regulations and conventions. Laws and regulations relating to environmental protection, product safety, origin of materials, human rights and position of employees, equality, health and safety, confidential processing of information, anti-bribery and prevention of conflicts of interest, competition, consumer protection as well as export control and laws and regulations regarding international sanctions are fundamental. Additionally, our partners shall comply with instructions given by Plugit.

3.2 Environmental responsibility

Partners of Plugit shall comply with environmental regulations and standards applicable to their operations and ensure that they operate in an environmentally responsible manner in all their sites and operations. Partners of Plugit commit to assess, prevent and decrease potential harmful environmental impact of their operations. Our partners shall commit to developing the circular economy together with Plugit.



Plugit participates on its part in combatting climate change and encourages its partners to decrease their emissions. Our partners shall aim to decrease their carbon dioxide emissions in accordance with science-based international and national emission reduction targets.

3.3 Labor rights and respect for human rights

Our partners shall respect all internationally recognized human rights and ensure that they are not affiliated with any action in breach of human rights. Partners of Plugit commit to assessing the human rights impact of their operations considering their scope and nature.

In their operations, our partners shall comply with applicable labor laws, conventions and regulations governing their personnel's working relations. The minimum age for employment shall be 15 years.

Partners of Plugit shall treat their personnel fairly and with respect. No one shall be discriminated against or treated differently due to gender, age, race or ethnic origin, nationality, language, religion or belief, opinion, political activity, trade union activity, family relations, health, disability, sexual orientation or other personal characteristics or other reasons, that are not based on the prerequisites for the job. Plugit has a zero-tolerance policy on bullying and harassment targeted towards an individual or group, and we require the same from our partners.

3.4 Health and safety

Our partners shall ensure the health and safety of their personnel at the workplace in accordance with applicable laws and regulations. Our partners shall further comply with Plugit's health and safety policies and instructions when working at Plugit's offices and sites. Plugit requires that its partners assess and prevent health and safety risks in their operations.

Plugit investigates and reports accidents and dangerous situations related to its operations. Our aim is zero occupational accidents.

Partners shall acknowledge in their operations, that Plugit is an intoxicant-free workplace.

3.5 Preventing corruption, money laundering and the grey economy

Corruption and bribery in any form is strictly prohibited. Partners of Plugit shall ensure that their management, employees and third parties acting on their behalf do not promise, offer, give, or accept any kind of bribery or undue benefit. Plugit has a separate Anti-Bribery Policy, which every partner of Plugit and individual and intermediary working on behalf of the partner must comply with.

Plugit does not accept grey economy in any form and requires the same from its partners.

Plugit's partners shall commit to preventing money laundering and complying with anti-money laundering laws applicable to their operations. A partner of Plugit is expected to have completed all necessary precautions to ensure that its operations do not involve money laundering or tax evasion.



3.6 Confidential processing of information

Plugit respects its employees' and customers' right to privacy and requires the same from its partners. Personal data must be processed confidentially and in accordance with applicable laws. Plugit's partners and any individual or intermediary working on behalf of the partner must additionally comply with the requirements regarding confidential processing of information, as provided by Plugit.

Confidential information must be kept secret. Our partners shall process trade secrets and other classified information which is received as part of the cooperation or relates to Plugit or third parties confidentially and in compliance with applicable laws.

3.7 Working with Plugit

Through operating in an economically responsible manner, Plugit works towards strengthening the social and economic development of society. We require our partners to support, as part of their operations, the quality and sustainability targets of Plugit.

The communication towards Plugit by its partners shall be open, honest, responsible, and predictive. The contact person or the persons responsible for communication at Plugit shall be informed without delay of any contact concerning Plugit made to its partners by media or other third parties, and the further steps will be agreed upon jointly.

Our partners shall not operate in a way that may damage the reputation or competitiveness of Plugit.

3.8 Responsibility for subcontractors and other partners

Plugit requires that its partners monitor the operations of their subcontractors and other partners to ensure that their business operations also comply with standards of responsible business practices equivalent to this Code.

4. Updates to the Code

Plugit periodically reviews this Code, and changes and updates it when needed.