



FINGRID

# Fingrid's

CODE OF CONDUCT

Approved at a meeting of the Board of Directors, 22 May 2024.

FINGRID

## Day-to-day work at Fingrid

We at Fingrid are working towards a brighter future, a clean energy system, and a reliable electricity supply. Our company has a substantially positive impact on mitigating climate change. We are building a power grid that will enable clean electricity to be used for heating, transportation and industrial processes.

We work closely with others, as cleaning the energy system is a joint effort. We need electricity producers, consumers, network operators, financiers, infrastructure builders, service providers and authorities to work towards a shared goal: Finland's climate targets and success. We also need good interaction with landowners of the transmission line areas and people in nearby areas. Fingrid is the unifying force in this effort and the foundation supporting the entire energy system.

Work must be done responsibly, with respect for the environment and people. As we perform this societally significant duty, it is essential that every Fingrid employee is committed to responsible and ethical business practices to promote sustainable development.

Our responsible operating methods are reflected in our day-to-day work. They earn the trust of our stakeholders and allow us to continue ensuring a reliable supply of clean electricity to our society.

Fingrid delivers. Responsibly.

**Asta Sihvonen-Punkka,**  
*President & CEO*



# Content




## We at Fingrid

- We understand the significance of our work to the customer, the company and society.
- We work as a team, helping others and sharing our knowledge and expertise.
- We are proactive and take responsibility for our efficiency.
- We search for new solutions. We have the courage to question established methods and try new ones.
- We value human diversity. We treat each other respectfully and genuinely.
- We ensure equality and a culture of full inclusion.
- We ensure emotional and physical safety. We intervene if this does not appear to be the case.



## We are committed to responsible and ethical operating practices to promote sustainable development

Our company carries the principal responsibility for Finland's power system and main grid, and, thereby, the functioning of our whole society. It is, therefore, important to ensure the social acceptance of our operations through shared values and this Code of Conduct. Our Code of Conduct helps both in daily decision-making and resolving problems.

We are committed to responsible and ethical operating practices to promote sustainable development. Responsibility is part of our values, our strategy, and everything we do. We have set environmental, social and governance (ESG) targets for our corporate responsibility work. Compliance and corporate responsibility are integrated into our management system and risk management. Our Code of Conduct is based on the UN's Global Compact Initiative and the Guiding Principles on Business and Human Rights.

We exercise due diligence and respect internationally recognised human rights. We avoid operating in a manner that leads to adverse human rights impacts, address any adverse human rights impacts when they occur, and take remediation

measures when required. If the requirements of national legislation conflict with internationally recognised human rights, we seek ways to honour human rights. We require our business partners, such as construction contractors, service providers and goods suppliers, to commit to complying with and respecting human rights, and we verify their compliance.

We do not accept the use of child labour and forced labour, and we recognise employees' freedom of association and the right to collective bargaining.

Our personnel are the mainstay of our operations. They are highly important as implementers of the basic tasks of the company and as its representatives and communicators. We require all our employees, managers and board members to observe this Code of Conduct in their daily work. It must be possible to trust our word and promises in all situations.

We require our business partner to comply with our separate Supplier Code of Conduct or other similar requirements that are separately agreed upon.



# Fingrid is transparent, fair, efficient and responsible

Our corporate culture is based on our corporate values. Values guide our practical operations and choices every day.

## Transparent

We actively share our skills and knowledge and communicate clearly. Through open and timely communication, we build mutual trust among our personnel and trust in the company among customers and society. We encourage collaboration, the free exchange of opinions and genuine listening. We allow a range of opinions and constructive feedback.

## Fair

We all respect each other without any kind of discrimination. At Fingrid, every employee is important. We follow shared ground rules, foster a common corporate culture, and use fair practices. We provide services to our customers on non-discriminatory terms and outsource external services in accordance with clear and transparent principles. We treat all our stakeholders consistently and equitably.

## Efficient

Efficiency requires us to take responsibility for our work, renewal, and achieving results. We are bold and open to new ideas. We develop the expertise of our personnel systematically, and we offer them the appropriate tools and adequate resources. Management principles and the duties and responsibilities of our personnel are clearly defined.

## Responsible

Every employee is aware of the significance of their work to the company, the customer and society. We deliver on Fingrid's responsibilities and tasks reliably and effectively. We build and maintain the power system with a sustainable approach to human rights and nature and create a platform for a clean power system. In our company, we respect the work input of every employee and ensure occupational well-being and safety. Every Fingrid employee can count on the company to be a responsible employer.



## We observe the best business and corporate governance practices

We comply with the legislation and international agreements applicable to our operations. Regulations such as the Limited Liability Companies Act, Securities Market Act, and Electricity Market Act govern the company's operations and the duties of its administrative bodies. Fingrid's operations comply with the Corporate Governance Code for Finnish listed companies.

We also observe Fingrid's internal rules. In our control system, corporate responsibility is included not only in this Code of Conduct but also in the other principles adopted by Fingrid's Board of Directors, which are specified by policies and more detailed guidelines adopted by the Executive Management Group as well as more detailed guidelines.

We are a trusted collaborator and contractual partner. Our operations are targeted and systematic in accordance with customer needs. We arrange competitive tendering for the services we need fairly, ethically and professionally. We carry out our purchasing transparently on market terms.

We are a responsible taxpayer and refrain from special arrangements to minimise taxes. We are committed to combating the grey economy. We do not condone money laundering or corruption, including extortion and bribery.

We operate transparently, fairly and impartially in interactions with our stakeholders and communicate clearly and effectively. Ensuring sufficient, timely and correctly targeted internal communication is one of our daily tasks.

We are mindful of the requirements around business secrets, inside information and other sensitive information and treat it confidentially. We only process personal data for pre-identified and legitimate reasons and in compliance with the applicable legal requirements.

We take good care of the company's tangible and intangible assets. We make decisions concerning the company's basic tasks and interests in the best possible way and do not seek personal gain from our jobs.

Our risk management is active and forward-looking and ultimately the responsibility of each and every employee. The continuity of our operations under all circumstances is critical from a societal perspective, so we take precautions in view of the possible realisation of risks.



## We reduce the environmental impact of our activities

We take into account land use and environmental impacts and opportunities to reduce them as part of our daily work. We pay special attention to assessing our environmental impact and taking advance precautions against environmental risks in accordance with the environmental precautionary principle.

We ensure that our business partners are also committed to environmentally responsible practices. We encourage the use and development of environmentally friendly solutions.





## We fulfil our responsibility as an employer

We aim to be an open, communal, innovative and productive work community. In our management and supervisory work, we promote cooperation and personnel motivation.

We are committed to promoting diversity in everything we do. The company guarantees equal opportunities, rights and treatment for all its employees, utilises the diverse skills of its personnel, and manages its operations productively. We choose our employees based on qualifications and skills. Our remuneration system is fair. We encourage continuous self-development among our personnel.

We offer our employees a safe, healthy and well-managed working environment. We assess the occupational health and safety risks and prevent accidents, injuries and excessively harmful workloads. We provide sufficient instruction and training in occupational health and safety, as well as personal protective equipment. We are committed to developing a safe working environment through the efforts of the entire work community. We also work with our business partner to promote occupational safety. Our goal is zero accidents.

*We encourage continuous self-development among our personnel.*



## We act ethically in situations of interaction

We treat everyone with respect and fairness. All kinds of discrimination, harassment and bullying are forbidden. We do not accept coercive, threatening or insulting behaviour.

Our advocacy activities to influence the legislation and operating conditions affecting our company are transparent.

We exercise reasonable discretion and act in the company's interest when representing it, entertaining guests, and accepting or giving business gifts. We neither give nor accept gifts or recognition that could lead to a dependent relationship or the expectation of something in return. Offering moderate corporate entertainment is part of normal hospitality. Business gifts given to or received from stakeholder representatives must be reasonable and of moderate value.

When we take part in a seminar trip or similar activity organised by a partner, Fingrid pays the costs of travel and accommodation. Participation in such a trip requires a business-related reason and approval through the company's normal procedures.

Fingrid may grant reasonable support to charitable activities in compliance with its Code of Conduct. The focus is on research, training, cultural activities, and activities related to human well-being. We do not support religious or political activities.



*We treat everyone with respect and fairness.*

## Together, we ensure that this Code of Conduct is fulfilled

Fingrid's Board of Directors has approved this Code of Conduct. The fulfilment of the Code of Conduct is regularly assessed, and the Code is updated whenever necessary.

As employees, we ensure that we understand this Code of Conduct and its application from the point of view of our own work. We also introduce new employees to this Code.

We ensure that work is carried out according to this Code of Conduct in our supervisory activities and through the efforts of the entire work community. If we suspect that activity contrary to this Code is taking place, we immediately inform our supervisor or Fingrid's management. In order to ensure operational responsibility, a confidential and independent reporting channel is also available to the personnel and third parties on the Fingrid website

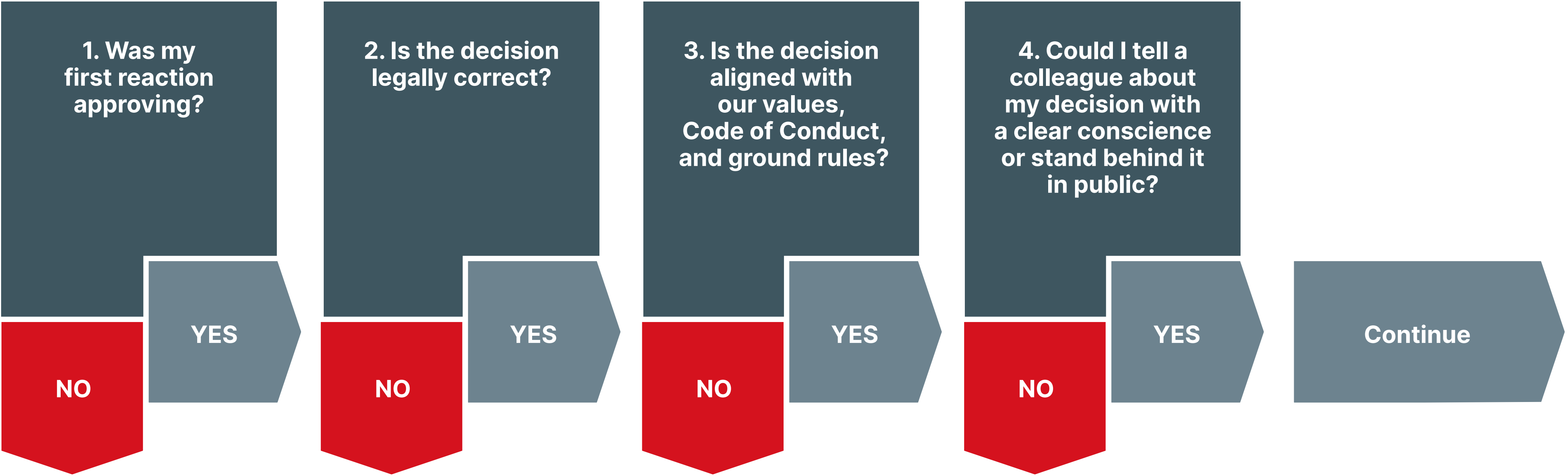
(<https://www.fingrid.fi/en/pages/company/corporate-responsibility/raise-a-compliance-concern/>).

We follow up suspicions of activity contrary to this Code of Conduct confidentially and professionally, guaranteeing the protection of privacy. We ensure that the reporter of a violation does not suffer negative consequences. Activity contrary to this Code results in discussion with a supervisor and, if necessary, disciplinary proceedings.

By observing this Code of Conduct, we ensure that our operations are socially acceptable and that the work community is transparent, fair, efficient and responsible.



**If you do not know what to do – think!**



**STOP TO THINK**  
If you are unsure, contact your supervisor, a manager, or the company's lawyers.

# Fingrid delivers. Responsibly.

## **Fingrid Oyj**

Läkkisepäntie 21, 00620 Helsinki  
P.O.Box 530, FI-00101 Helsinki, Finland  
Telephone +358 30 395 5000



**FINGRID**