

Fortum – Supplier Code of Conduct

Fortum is a Nordic energy company. Our purpose is to power a world where people, businesses and nature thrive together. Our core operations in the Nordics comprise of efficient, CO₂-free power generation as well as reliable supply of electricity and district heat to private and business customers. We are one of the cleanest energy producers in Europe and our actions are guided by our ambitious environmental targets.

Fortum is committed to sustainability in all its operations. In accordance with the Fortum Sustainability Policy and Fortum Code of Conduct, the company wishes to actively engage with stakeholders in continuously improving its environmental, social and economic performance. Fortum's suppliers play an important role in our efforts for sustainability.

SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (the Code) is applicable to Fortum's operations in every part of the world and to any supplier that delivers goods, services, work or other business activities to Fortum.

The purpose of this Code is to define the basic sustainability requirements placed on Fortum's suppliers. The Code is based on the principles of the United Nations Global Compact and is divided into four sections: business principles, human rights, labour standards and environment. Fortum has been a participant in the UN Global Compact initiative since 2010. Fortum is also a supporter of the UN Sustainable Development Goals.

Fortum's suppliers are obliged to implement the principles of this Code in all their business activities. Suppliers shall also comply with any additional requirements agreed in the contract documents. Suppliers are expected to have appropriate management systems in place to ensure compliance with this Code, proportionate to the size, complexity and risk environment of their business. Suppliers are also responsible for ensuring and monitoring their sub-suppliers' compliance with the principles of this Code.

Fortum's suppliers shall confirm compliance with this Code by continuously documenting compliance, providing information to Fortum on request, and allowing on-

site audits by Fortum or an external auditing company representing Fortum. Material breach of the Code or repeated refusal to provide the required information may lead to the termination of cooperation with Fortum.

Fortum's suppliers should report any suspected violation of the Code to their Fortum contact person, via the local Fortum reporting channel (if available) or SpeakUp tool: see www.fortum.com. SpeakUp is available to any internal or external stakeholder, and it can be used anonymously if necessary.

BUSINESS PRINCIPLES

Fortum's suppliers shall comply with all the applicable laws and regulations in all locations where they conduct business. In addition to complying with all applicable legal and regulatory requirements, suppliers are expected to act in accordance with the highest business ethics standards. Suppliers shall avoid any situations where a conflict of interest between the supplier and Fortum exists, and shall disclose any potential or existing conflict of interest to Fortum.

Accuracy of information, privacy and fair competition

Suppliers agree to safeguard the security of Fortum's information and confidentiality of confidential information, and to handle personal and other data appropriately, in

accordance with applicable laws and regulations and Fortum's guidelines. Suppliers shall issue accurate and relevant financial and other information about their business operations, conduct responsible marketing, and compete fairly and ethically in all other respects.

Anti-corruption, anti-bribery and anti-money laundering

The highest standards of integrity are to be expected from Fortum's suppliers, including its sub-suppliers, and other entities acting on behalf of the supplier, in all business interactions. Any form of extortion, bribery or corruption, including improper offers of payments to or from employees or organisations, is prohibited. Suppliers shall establish and maintain policies and procedures designed to prevent bribery and corruption.

Suppliers shall not provide Fortum representatives with any gifts or hospitality in any situation in which it might influence, or appear to influence, a representative's decision in relation to the supplier.

Suppliers shall implement protective measures and refrain from any activities which may be considered part of the money laundering process. Suppliers shall comply with all applicable laws and regulations regarding export control and export restrictions, as well as economic sanctions imposed by the EU, US, UK or UN.

HUMAN RIGHTS

Fortum's suppliers shall support and respect internationally proclaimed human rights that are expressed in e.g. the International Bill of Human Rights, and ensure they are not involved in human rights violations. Suppliers shall identify their human rights impacts, implement mitigation actions when required and provide remedial action in the event of human rights violations.

LABOUR STANDARDS

Freedom of association

Fortum's suppliers shall recognise and respect employees' freedom of association and their right to freely choose their representatives. Suppliers shall also recognise employees' right to collective bargaining. Suppliers shall not discriminate against employees' representatives or members of trade unions, or restrict their ability to carry out their representative functions in the workplace.

Forced labour

Fortum's suppliers shall not use forced labour, and employees shall be free to leave their employment after reasonable notice as required by national law or contract. Employees shall not be required to lodge deposits of money or identity papers with their employer.

Wages and working hours

Fortum's suppliers shall ensure that all employees are provided with understandable, written employment contracts setting out their employment conditions. Salary and terms shall be fair and reasonable, and at least comply with national laws or industry standards, whichever is higher. Working hours shall comply with national laws. Employees should have at least one day off per seven-day week.

Child labour and young workers

Fortum's suppliers shall not, in any circumstances, employ children who are below the minimum legal employment age. The minimum age is the age of completion of compulsory schooling, or not less than 15 years (or 14 years in countries subject to the developing country exception of ILO Convention 138). Children and young people above the minimum age but under 18 years of age shall not be employed in any hazardous work, or work that jeopardises their health, safety, or morals.

Non-discrimination

Fortum's suppliers shall treat their employees with respect and dignity. Any discrimination based on partiality or prejudice is prohibited. This includes discrimination based on ethnicity, gender, sexual orientation, marital status, pregnancy, parental status, religion, etc. Threats of violence, corporal punishment, physical or verbal abuse, or other unlawful harassment are strictly prohibited.

Health and safety

Fortum's suppliers shall provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Suppliers shall ensure that appropriate health and safety information is provided to its employees and sub-suppliers, and that relevant training and protective equipment is provided. Suppliers working for Fortum shall comply with Fortum's general EHS requirements as applicable. Suppliers shall at least provide employees and sub-suppliers with drinking water, clean toilets, adequate ventilation and thermal conditions, emergency exits, proper lighting, and access to first aid supplies or other provisions for emergency care at the workplace, as well as in accommodation provided by the supplier (if any).

Prevention of alcohol and drug use at work

Fortum is an alcohol- and drug-free workplace. Suppliers' employees and their sub-suppliers are permitted to work at Fortum's premises only if they are sober and drug-free. Suppliers shall take precautionary action to prevent alcohol and drug abuse. Occasional testing can be performed on suppliers' employees when they are working at Fortum's premises if it is allowed in national (or local) legislation.

ENVIRONMENT

Fortum's suppliers shall support a precautionary approach to environmental challenges and undertake initiatives to promote greater environmental responsibility. Suppliers should identify the environmental impacts of their operations and implement mitigation actions when required. Suppliers are expected to strive to continuously reduce the use of energy and water, as well as minimise waste and emissions to the air, water and land in their operations, and mitigate impacts on biodiversity.

Suppliers should consider the climate impact of their operations and reduce greenhouse gas emissions where reasonable. Suppliers are expected to promote the circular economy and pay attention to the efficient use of materials and the lifecycle impact of their products. Suppliers are encouraged to develop and diffuse environmentally friendly technologies. Suppliers shall at least comply with all applicable environmental laws and regulations.