

APPROVED  
by resolution of the Management Board of Eesti Energia AS  
on November 21, 2022

### **Eesti Energia Group's Code of Ethics for Partners**

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| <b>Category</b>                               | Resolution of the Management Board of Eesti Energia AS  |
| <b>Scope</b>                                  | Eesti Energia Group   |
| <b>Valid from</b>                             | 21.11.2022  |
| <b>Related documents</b>                      | Eesti Energia Code of Ethics<br>Procurement procedure of Eesti Energia AS and undertakings of the Group<br>Occupational health and safety requirements for the contractual partners |
| <b>Forms and information system solutions</b> | Not applicable  |
| <b>Owner</b>                                  | Risk Management and Compliance Department of Eesti Energia AS   |

#### **1. Objective**

1.1. The term "Partner" in this Document refers to any individual or legal entity that has a legal relationship with an undertaking of the Eesti Energia Group to provide goods, services materials or works. It also includes Partner's subcontractors and other entities acting on behalf of the Partner. Partner is also a person that has been granted use of Eesti Energia's premises, and also a person with whom joint cooperation objectives have been agreed.

1.2. The purpose of this document is to inform our Partners of the ethical requirements that serve as the prerequisite for cooperation. We expect our Partners to operate in accordance with the principles herein, and in full compliance with all applicable laws and regulations. This document goes beyond mere compliance with the law by drawing upon internationally recognized standards to advance social and environmental responsibility.

1.3. This document sets out the minimum standards of ethics that we expect all our Partners to comply with. If these expectations are violated, or a Partner fails to correct the non-compliance, Eesti Energia may terminate the cooperation.

1.4. This Document does not give detailed instructions on any given situation or how to comply with legal requirements in the countries in which Eesti Energia operates. It is therefore expected that our Partners always show good judgment and seek expert advice when in doubt.

1.5. Partners shall maintain necessary information to demonstrate compliance with the requirements of this document and applicable laws and regulations. If requested to do so, Partners shall provide this information to Eesti Energia. In case of reasonable doubt, Eesti Energia reserves the right to audit Partners' compliance activities and performance, to make sure that the requirements set forth in this document are being complied with.

#### **2. Business Principles**

2.1. In addition to all applicable laws and contractual requirements, Partners shall comply with this Code of Ethics. If there are contradictions between the terms of this Document and applicable laws and regulations, Partners are expected to follow the most stringent standard.

2.2. Eesti Energia maintains a zero-tolerance policy on fraud and corruption and expects Partners not to engage in, or tolerate, any form of fraud and corruption.

2.3. In its dealings with Eesti Energia, Partners shall avoid any situations where a conflict of interest or an appearance of a conflict of interest may arise. Partner acts impartially in its relations with Eesti Energia, and does not make any impermissible benefits to other undertakings, organizations or persons. Partner does not establish relationships that may result in an actual or apparent conflict of interest with the interests of Eesti Energia. Partner does not use the property of Eesti Energia, or the information obtained from Eesti Energia due to its duties or legal relationship, for personal gain or for an activity competing with Eesti Energia.

2.4. In order to become a Partner, the individual or legal entity has to compete honestly and ethically in accordance with legislation and the rules of competition. Partners shall not engage in any activities that restrict fair competition. Partners are therefore expected to ensure compliance with applicable anti-trust or competition laws, and to not enter anti-competitive agreements or engage in anti-competitive conduct.

2.5. Partners have to follow applicable data protection laws and regulations, and have in place sufficient security measures to protect the information disclosed to them by Eesti Energia. Partners shall only collect data that is necessary to perform their work, and ensure the confidentiality of said data.

2.6. Eesti Energia expects our Partners to ensure that their business is conducted in a manner that does not violate any relevant trade sanctions, and to inform Eesti Energia should they ever become subject to international sanctions.

2.7. Partners shall perform periodic evaluations of its facilities and operations, and the facilities and operations of its subcontractors that provide goods or services to Eesti Energia, to ensure compliance with this Document and applicable law.

### **3. Human and Labor Rights**

3.1. Partners shall comply with applicable labor laws regarding the terms of employment for its employees. These terms include, but are not limited to, working hours, wages and benefits, overtime, sick leave and holidays.

3.2. Partners shall act with respect towards all workers and take active measures to ensure a workplace, where harassment, violence, bullying, and any other behaviour that is perceived to be disrespectful, offensive, or humiliating, is prohibited.

3.3. Partners shall recognise and respect their workers' freedom to associate, and their right to collective bargaining, where permissible by local laws.

3.4. Partners shall not tolerate discrimination. All employees shall be treated fairly and equally, regardless of their nationality, age, race, sex, language, origin, color, creed, disability, sexual orientation, political or other convictions. Discrimination also means less favourable treatment of a person in connection with pregnancy and child-birth, parenting, performance of family obligations or other circumstances related to gender.

3.5. Partners shall not use child labour within their organisation, and shall comply with minimum age requirements set out in International Labour Organization (ILO) Conventions and national legislation. That is, the Partner may employ young workers with a minimum age of 15. Young workers (under 18) admitted to work must have working conditions appropriate to their age, i.e. they should not be engaged in any work likely to harm their safety, health or physical,

mental, moral or social development. Partners shall not require young workers to work overtime or perform night-time work.

3.6. Partners shall not use forced labour in their operations. The 11 possible indicators of forced labour set out by the ILO are: abuse of vulnerability of the employee, deception (e.g. knowingly providing false information about the working conditions), restriction of movement, social isolation, physical and/or sexual violence, intimidation and threats, retention of identity documents, withholding or non-payment of wages, debt bondage, abusive working and living conditions, excessive overtime. Partners shall take reasonable measures to prevent these labour rights violations within its supply chain. Particular attention shall be paid to vulnerable individuals and groups (e.g. women, children and minorities), who may be at higher risk of human rights abuse.

#### **4. Health and Safety**

4.1. Partners shall protect and promote the health and safety of their employees by providing them with a workplace that is in compliance with the „Occupational health and safety requirements for the contractual partners of Eesti Energia“ and all applicable laws, regulations and permits.

4.2. Partners shall provide the necessary instruction, training and equipment for their employees relating to occupational health and safety.

#### **5. Environmental impact**

5.1. Partners shall, at a minimum, operate in compliance with all applicable environmental laws, regulations and other requirements (e.g. required environmental permits).

5.2. Partners shall manage their operations responsibly in relation to the environment by undertaking activities that promote greater environmental responsibility.

5.3. Partners shall take measures to avoid and/or minimize any negative environmental impact of its activities.

#### **6. Reporting irregularities to Eesti Energia**

6.1 Partners shall report any non-compliance with this document and/or other actual or suspected violations to Eesti Energia Group's Risk Management and Compliance Department ([annateada@energia.ee](mailto:annateada@energia.ee); [www.energia.ee/annateada](http://www.energia.ee/annateada); +372 466 6000).