



## Fingrid's Code of Conduct

**FINGRID**

## Day-to-day work at Fingrid

As Finland's transmission system operator, Fingrid plays a significant role in Finnish society. Our duty of high-quality care requires of us an exceptionally high level of quality in all fields of responsibility as well as the ability to adapt with a changing operating environment.



Our responsible operating methods are seen daily in our day-to-day work. We set ambitious targets for our operations. Our company culture is open, communal, regenerating, target-oriented, and in compliance with good governance. We develop our operations in a balanced way and with a long-term view from the perspectives of our customers, society, finances and our personnel. We seek efficiency by combining our own core expertise with that of the best operators. By working like this, we earn the trust of our customers, society, our shareholders and the working community.

**Fingrid delivers. Responsibly.**

Jukka Ruusunen, President & CEO

## Contents

- Being a Fingrid employee
- Fingrid's Code of Conduct
- We operate transparently, impartially, efficiently and responsibly
- We observe best business practices and good governance
- We reduce the environmental impact of our activities
- We take responsibility as an employer and we respect people
- We act ethically in situations of interaction
- Together we ensure that this Code of Conduct is fulfilled



## Being a Fingrid employee

- I understand the significance of my work to the customer and to society.
- I act as part of a team – I appreciate, help and support others.
- I take responsibility for my own work, efficiency, regeneration and achievement of targets.
- I actively share my skills and information, and communicate in an understandable manner.
- I am bold and open to new ideas – I question things and bring new solutions.
- I give and receive feedback – constructively.



## Fingrid's Code of Conduct

Our company bears key responsibility for the Finnish power system and the 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 operating practices in order to promote sustainable development. Responsibility is part of our values, strategy and everything we do. Our Code of Conduct is based on the UN Global Compact and the Guiding Principles on Business and Human Rights.

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 that all our employees, managers and board members observe this Code of Conduct in their daily work. It must be possible to trust our word and promises in all situations.

We require that contractual partners that supply us with goods and services comply with our separate Supplier Code of Conduct or other separately agreed, similar requirements.



**It must be possible to trust our word and promises in all situations.**



## **We operate transparently, impartially, efficiently and responsibly**

Our operations rely on our values, which are transparency, impartiality, efficiency and responsibility.

Transparency begins from the premise that we actively share our skills and information, and communicate clearly.

Through open and timely communication, we build mutual trust among our personnel, as well as trust in the company among customers and society. We encourage cooperation, the free exchange of opinions, and genuine listening. In discussions, we allow different kinds of opinions and constructive feedback. We deal with confidential matters responsibly so that the privacy of all parties is guaranteed.

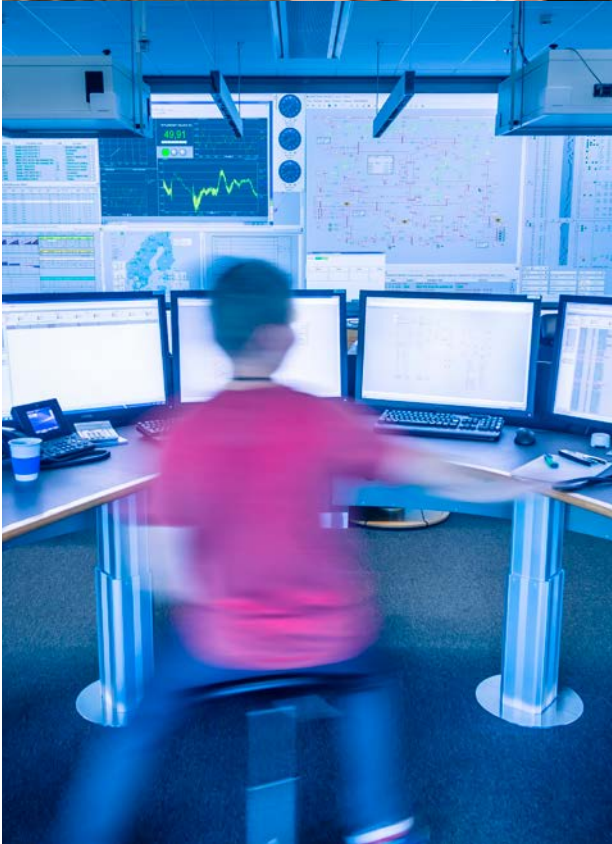
Impartiality requires that we all appreciate each other without any kind of discrimination. At Fingrid, every employee is important. We follow a common set of rules and our practices are fair. We provide services to our customers without discriminating and we subject external services to competitive tendering based on unambiguous and transparent principles. We treat all our stakeholders in a consistent and equitable manner.

Efficiency requires us to take responsibility for our own work, for regeneration, and for 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.

Responsibility requires every employee to be aware of the significance of his or her own work to the customer and to society. We take care of the tasks and responsibilities set for Fingrid reliably. We build and maintain the power system with consideration of the environment and safety. In our company, the work input of each employee is appreciated and the occupational well-being of our personnel is ensured. Each Fingrid employee can trust the company being a responsible employer.



**Responsibility requires every employee to be aware of the significance of his or her own work to the customer and to society.**



### Transparency

- for customers and society
- cooperation and communality
- timely and understandable communication
- tolerance and the free exchange of opinions
- availability and distribution of information

### Impartiality

- listening to and appreciating people
- fairness
- equal treatment of stakeholders

### Efficiency

- a methodical approach
- economy
- quality
- regeneration and the willingness to try new things
- prediction

### Responsibility

- certainty and keeping promises
- safety
- well-being at work and respect for others
- preserving the environment
- reliability



## We observe best business practices and good governance

We comply with legislation and international agreements applicable to our operations. The company's operations and the duties of its administrative bodies are governed by regulations such as the Finnish Companies Act, Securities Market Act and Electricity Market Act. In its operations, Fingrid complies with the Finnish Corporate Governance Code for 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 principles adopted by the Board of Directors, which are specified by policies adopted by the Executive Management Group as well as more detailed guidelines.

We are a reliable partner for our customers and suppliers in cooperative and contractual matters. Our operations are targeted and systematic in accordance with customer needs. We arrange competitive tendering for the services we need honestly and ethically. We carry out our purchasing on market conditions and transparently.

We are a responsible taxpayer and undertake, for our part, to prevent the grey economy. We refuse money-laundering and corruption, including extortion and bribery.



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

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 we do not seek personal benefit in the performance of our jobs.

Our risk management is active and anticipatory and ultimately the responsibility of each and every employee. The continuity of our operations under all circumstances is critical from a societal perspective among others, so we take precautions bearing in mind the possible realisation of risks.

## **We reduce the environmental impact of our activities**

We take into account land use-related and environmental impacts and opportunities to reduce them as part of our daily work. We pay particular attention to assessing and minimising environmental impact and take advance precautions against environmental risks.

We commit our contractors and suppliers to an environmentally friendly approach. We encourage the use and development of environmentally friendly solutions.





## We take responsibility as an employer and we respect people

Our aim is an open, communal, regenerating and target-oriented working community. In our management and leadership, we promote cooperation and the occupational motivation of our personnel.

We respect internationally recognised human rights. We avoid operating in a manner resulting in adverse human rights impacts, address any adverse human rights impacts when they occur and take measures of remediation when required. If the requirements of national legislation conflict with internationally recognised human rights, we seek ways to honour human rights. We also require that our business partners respect human rights.

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.

We choose our employees based on qualifications and skills. Our salary system is fair. We encourage our personnel to constantly improve themselves.

We offer our employees a safe, healthy and well-managed working environment. We assess occupational safety and health-related risks, and prevent accidents and injury. We provide sufficient instruction and training in occupational safety and health, as well as personal protective equipment. We are committed to the development of a safe working environment through the efforts of the entire working community. We also promote occupational safety in cooperation with our contractors and suppliers.



## 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. We are never intoxicated at the workplace.

We use discretion and think of the company's interest when representing it, when entertaining, when accepting business gifts or when giving them. We neither give nor accept gifts or honours that might lead to a dependent relationship or to the expectation of something in return. Moderate entertaining is part of normal hospitality. Business gifts given to or received from stakeholder representatives must be of moderate value.

When we take part in a seminar trip or something similar 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 support work done for the public benefit and complying with its Code of Conduct to a reasonable degree. The focus is on research, training, cultural activity and activity 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 a 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 supervisor activity and through the efforts of the entire workforce. If we suspect that activity contrary to this Code is taking place, we immediately inform our supervisor, Fingrid management or internal auditing.

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 misdemeanor does not suffer negative consequences. Activity contrary to this Code will result 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 working community is transparent, impartial, efficient and responsible.

In order to ensure operational responsibility, an external "whistleblowing" channel is also available for use: **[fingrid@deloitte.fi](mailto:fingrid@deloitte.fi)**

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