



# VENI

Energy Group

Securing energy for your business

# VENI ENERGY GROUP

## SUPPLIER CODE OF CONDUCT

Version 1 | 2024

# VENI Energy Group is a leading player in energy services and sourcing in the Nordic region.

The Group serves more than 48.000 businesses across the Nordics with a total energy volume of over 11 TWh. Our Energy Sourcing service ensures competitive electricity prices over time, and our Energy Audit service ensures accurate billing for your past and current energy consumption. Property owners and tenants benefit from our Metering Management service, with complete solutions for administration of energy consumption and costs, optimal and modern metering structure and equipment, flexible solutions, and clear reporting. VENI Energy Group is owned by Norvestor private equity. Our Norwegian, Swedish and Finnish subsidiaries are Eneas Services, VENI Metering, Nordel Energi, VENI Energia, Yrittäjien Sähköhankinta and Neras Direkte.

## Introduction

VENI Energy Group's values are customer focus, commitment, and reliability. We strive to live these values every day, and our internal guidelines ensure that we conduct business in an ethical and sustainable manner. This makes us a trustworthy business partner.

Our internal guidelines cover requirements for decent working conditions, human rights and diversity, business ethics, HSE, anti-corruption, sustainability, GDPR and privacy.

We build business relationships with suppliers who share similar values and follow the same principles of business conduct. Our Code of Conduct lays out the standard to which we hold our suppliers and is a tool to cement compliance in our value chain.

## Compliance

VENI Energy Group expects compliance with all applicable laws, legal regulations and the terms laid out in this Code of Conduct. All breaches of compliance must be reported to VENI Energy Group in a timely manner, with an appropriate corrective action plan.

To ensure compliance, VENI Energy Group performs risk- and due diligence assessments of all suppliers, and we may ask suppliers to complete and return a self-assessment questionnaire on the topics laid out in this Code of Conduct.

Lack of cooperation with self-assessment, failure to report violations of the terms in this Code of Conduct, or the discovery of non-compliance may result in a reduction of, or ultimately termination of, the business agreement between VENI Energy Group and the supplier.



# 1. Human Rights

## 1.1 Fundamental human rights

VENI Energy Group expects that our suppliers are committed to the internationally recognized Universal Declaration of Human Rights. Suppliers shall integrate human rights policies in their internal guidelines and policies, and human rights impact should be assessed regularly by the supplier to identify and monitor risks of non-compliance internally and throughout their supply chain, including routines for rectifying damage or providing compensation to victims of violations of basic human rights or decent working conditions.

## 1.2 Non-discrimination & fair treatment

All employees are to be treated equally, independent of race, colour, sex, language, religion, national or social origin, age or other status.

Suppliers are encouraged to support organizations that help those who have been subjected to breaches of human rights.

# 2. Health and Safety

## 2.1 General requirements

VENI Energy Group expects all suppliers to work systematically with health, safety, and environment (HSE) and ensure safe working conditions in line with national laws and the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work.

The physical environment shall be reasonably adjusted to ensure health and safety for employees, customers, and other visitors and, to the extent reasonable, including those with disabilities and special needs.

## 2.2 Whistleblowing

Suppliers must work to ensure that no employees are exposed to harassment, discrimination or bullying at the workplace. A whistleblowing function where those employed by the supplier can anonymously report cases of objectionable conditions that occur in the workplace must be available to employees.

# 3. Employment

## 3.1 Work hours

All those employed by the supplier shall have working hours and leave correlating to the laws and regulations of the country of employment. Suppliers are encouraged to follow ILO standards where they are stricter than national laws and regulations.

### **3.2 Wages**

Employees are to receive equal pay for equal work. All wages must correlate with, or surpass, national or industry minimum standards. There must be adequate legal grounds for the reduction of wages. Deduction shall never be used as a disciplinary measure.

### **3.3 Terms of employment**

The supplier will provide all employees with written information about their employment, including terms and conditions, wages, and any employee benefits, in a format and written language the employee can understand.

### **3.4 Forced & child labor**

All forms of forced or compulsory labor and child labor must be rejected. The employment of individuals under 18 years of age must follow employment laws in the country of employment.

### **3.5 Freedom of association and collective bargaining**

All employees shall have complete freedom of association and the effective recognition of the right to collective bargaining.

### **3.6 Recruitment**

Recruitment, placement, training, and advancement of staff shall be based on qualification, skillset, and experience.

Job seekers are not to be discriminated against based on gender, pregnancy, maternity or adoption leave, caretaker duties, ethnicity, religion, disability, sexual orientation, age or any combinations of these grounds in the recruitment process.

## **4. Sustainability**

### **4.1 Environmental impact**

VENI Energy Group expects all suppliers to commit to and ensure environmentally friendly and energy efficient business activity. Suppliers must work to reduce environmental impacts where possible, and continuously focus on sustainable improvements.

Focus areas include, if relevant, energy efficiency, waste reduction, resource efficiency for raw materials and water use, responsible material sourcing and responsible management of hazardous waste and substances.

### **4.2 Environmental focus**

VENI Energy Group encourages suppliers to take active measures to get certified with Eco-Lighthouse, EMAS (Eco-Management and Audit Scheme), ISO or similar. VENI Energy Group may prioritize collaboration with certified suppliers.

### **4.3 GHG reporting**

VENI Energy Group is working towards a greener future and lowering its Co2 emissions. To carry out a yearly Greenhouse Gas Emission inventory, suppliers are expected to make available information about their greenhouse gas emissions, production, or other sustainability work to VENI Energy Group upon request.

### **5. Anti-corruption**

Suppliers must oppose all forms of corruption, money laundering and fraud, and comply with relevant national anti-corruption legislation, as well as applicable anti-corruption legislation in the countries in which they operate.

All contracts with business partners must be in writing, and anti-corruption clauses shall be included in contracts where possible.

Suppliers are expected to perform risk assessments to uncover potential of corruption, provide employee training to minimize risk, keep accurate accounting, and regularly review and update company anti-corruption routines.

Any gifts or business courtesies between the supplier, its sub-suppliers and customers shall be of moderate value and happen at infrequent intervals.

### **6. Confidentiality & anti-trust**

Suppliers are obliged to observe confidentiality towards all outsiders regarding any matter they become aware of during their collaboration with VENI Energy Group. Suppliers shall observe silence about, and not use, any of the information they receive about VENI Energy Group's strategy, business operations, or the like.

VENI Energy Group will not collaborate with any supplier who does not follow anti-trust regulations.

### **7. GDPR & privacy**

VENI Energy Group expects suppliers to never share, sell, transfer, or otherwise disclose personal data to others, unless there is a legal basis for doing so.

All cooperation with subcontractors that process personal data on the supplier's behalf shall be regulated through a data processing agreement (DPA).

### **8. Compliance with relevant sanctions regimes**

Our suppliers shall comply with relevant sanctions regimes (including the US, UN and EU). VENI Energy Group will screen potential and existing suppliers for compliance with all relevant sanctions.

## Contact information

If you have any questions about the content laid out in this Code of Conduct or need to contact VENI Energy Group to disclose non-compliance, you can reach our Sustainability and Risk Management team through [Compliance@venienergy.com](mailto:Compliance@venienergy.com)

We look forward to building a valuable and sustainable business relationship with you.

I hereby confirm that ..... [company name]  
shall comply with VENI Energy Group's Supplier Code of Conduct

Signed by:

Title:

Date

Signature

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