

# Ethics Policy at Elenger/Eesti Gaas Group

Approved by Elenger Board on February 5, 2020

We are proud to follow our Ethics Policy in our everyday work:

## 1. General principles

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- 1.1. We assume our employees, board members, partners and suppliers adhere the Ethics Policy. All employees and board members (hereinafter the employee) are expected to exercise the Ethics Policy in their daily work.
- 1.2. We fully commit to comply with the laws and regulations of the countries in which we operate.
- 1.3. In activities which do not fall within the scope of laws or other mandatory legal proceedings, we adhere to the principles of transparency, honesty, equitability and fairness as well as industry's best practices.
- 1.4. We have established rules to comply with those principles and we monitor the execution of the rules.

## 2. Cornerstones

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- 2.1. Ethics and integrity
  - We keep our promises.
  - We respect confidentiality of business and personal information.
  - We respect and adhere to local and international ethical and professional standards.
  - We value highly and contribute to ensuring health and safety.
  - We follow our organisation policies and rules.
- 2.2. Professionalism
  - We do our work professionally, diligently and conscientiously comply with all applicable laws, regulations and standards.
  - We always try to do our best.
  - We value the principles of lifelong learning.
- 2.3. Treating people fairly and equitably
  - We treat all people fairly and equitably without discrimination.
  - We respect differences. Any discrimination, including discriminations against on the basis of gender, sexual orientation, age, pregnancy, race, religion, political view, ancestry, place of origin, colour, ethnic origin, citizenship, marital status, social conditions, disability or means used to overcome a disability is strictly prohibited.
  - We do not use child labour as well as forced or compulsory labour.
  - We care about each other.
  - We communicate kindly and politely.
- 2.4. Social and environmental responsibility
  - We value the people, community and the environment around us. We have key policies and procedures to actively support the community and protect the environment.

## 3. Applicable rules

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- 3.1. Integrity of our services
  - We ensure the integrity of our services through our processes and controls.
  - We do our best to avoid situations in which our professionalism, independence or impartiality may be compromised.
  - Our work shall be carried out honestly in a professional, independent and impartial

manner following our own approved measures and procedures.

### 3.2. Integrity of documents and information supplied

- Each employee is personally responsible for all the information he or she submits. All employees of the company must ensure that the documented information provided by them, including through IT-systems, internally or externally, contain reliable, truest and complete information to customers.
- This also applies, among other things, to documented information in respect of human resources, finance, legal, tax and documents submitted to governmental or regulatory authorities.
- All financial and accounting information must be duly and correctly recorded in company's books and accounts. All entries must be justified by the appropriate items of proof, in good faith.

### 3.3. Fighting bribery and corruption

- We fight against bribery and corruption. None of the company's employees allow, offer or pay any bribery, either directly or indirectly, in order to obtain any discounts in favour of the company or to obtain any other benefit for the company. No employee may, in the performance of his or her duties, ask or accept any form of bribery, either directly or indirectly, from any person.
- We ensure that all company's employees have knowledge that it is prohibited to solicit, accept or offer a bribery directly or indirectly in the course of the performance of their duties.
- All charitable donations and sponsorships must be pre-approved by the Management Board of the Eesti Gaas.
- We will inform the immediate superior about all offered gifts, hospitality or costs that provide tangible benefits to the recipient.
- We maintain accurate books and records which properly and fairly document all financial transactions.
- All our employees must strictly comply with all relevant local and international anti-bribery and anti-corruption laws.

### 3.4. Conflicts of interest

- A conflict of interest means a situation where the interests of the company differ from the personal interests of an employee, a close family member of the employee, or persons with whom we have a personal or business relationship.
- It is important to avoid situations that may affect our decision and we all have an obligation to report any obligations or relationships that may cause potential conflicts of interest.
- The decision as to whether to prohibit anything, to carry out additional checks or to accept it is done after analysing the conflict of interest.

### 3.5. Sustainable cooperation with business partners

- We observe that our business partners adhere to laws, ethical principles and good practice. We make our procurement practices in a fair, transparent manner and according to the rules established by the company.

### 3.6. Fair competition

- We are committed to competing fairly and in compliance with Competition Act and all other applicable laws. Competition laws typically prohibit agreements among competitors as to pricing or other competitive terms, or, as to the division of markets or business. All our employees must strictly comply with Competition Act and all other applicable laws. When in doubt, any employee should seek advice from Eesti Gaas Legal Department.
- We must promote the strengths of the company rather than highlighting the

shortcomings or failings of our competitors.

### 3.7. Confidentiality and protection of personal data

- At Eesti Gaas Group we place high value in confidentiality and protection of personal data. We follow the general principles of personal data protection, the rules deriving from the GDPR, and Principles of use of Personal Data of Eesti Gaas Group.
- All information received in the course of the provision of our services must be treated as, and must remain, strictly confidential. All our employees are personally committed to protect the information in their possession, and to ensure that it is kept confidential by employees working under their control, either by providing for specific contractual provisions in their employment agreements, or by the signature of confidentiality agreements, or by any other legally appropriate means. Everyone should ensure that the protection of such confidential information is secured by implementing locally adequate security measures, ensuring that access is restricted to authorized persons only.
- An employee may have access to inside information in daily activities. The use of this information for personal reasons or the disclosure thereof to people who are not entitled to it may violate the company's rules and harm the interests of the commercial enterprise. As long as this information is not disclosed to the public, it must remain strictly confidential.

### 3.8. Whistle-blower policy

- Whistle-blower policy is a new part of the company's general approach to the prevention and detection of misconduct. The relevant document is under development. An effective whistle-blower policy can help business operators to learn from problems, improve their practices, and reduce business risks.
- All employees are expected to report any violation or alleged violation of Ethics Policy or laws and regulations that have become known to them.
- The employee can report such violations to his or her immediate superior, higher superior, human resources manager or to the working environment representative. Each employee may select a notification channel of his choice. The whistle-blower shall be provided with anonymity upon request, if there are no impediments to it.

### 3.9. Communication with the media and public

- We develop active communication to strengthen the reputation of the company in front of our customers and the public. Media relations are the responsibility of the Group's Communications and Marketing Department. All media statements or replies to requests to a media shall be treated either through Communications and Marketing department or in a coordinated manner in order to avoid the sharing of the misleading or the confidential information. Responding to queries of the media must take place promptly and priority is to avoid the risk of disinformation or negative ratings related to the company.

## 4. Implementation of the Ethics Policy

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### 4.1. Eesti Gaas Group ethic related documents applicable to all employees of Eesti Gaas Group are:

- this Ethics Policy;
- company's internal rules (such as *Töösisekorra eeskiri*);
- other relevant internal rules related to ethical issues and work environment.

### 4.2. Scope of implementation

- The Ethics Policy applies to all employees of Eesti Gaas Group together with our business partners, who are required to comply with this Ethics Policy in full. We must ensure that they are aware of and adhere to the content of this Ethics Policy.
- The manager of each business unit is responsible for the implementation and

administration of the Ethics Policy under its responsibility. For this purpose, each manager is required to ensure that all employees are familiar with and implement the Ethics Policy, in particular by making the Ethics Policy available to their employees, by training them, informing them of their obligations and by ensuring that they understand that any violation of this Ethics Policy constitutes a serious breach of the employee's obligations.

#### 4.3. Compliance with the Ethics Policy principles and rules

- The company's management assesses compliance with the principles and rules of the Ethics Policy. The principles of the Ethics Policy shall be reviewed and, if necessary, supplemented each year. Each employee of the company has the opportunity to assess compliance with the Ethics Policy in the staff training meetings or by informing his or her superior and to propose a supplement to the Ethics Policy.
- Any worker who does not comply with the requirements of the Ethics Policy shall be subject to measures, which first of all shall include appropriate training, but may include termination of the employment contract. In any event, the employee in breach has the right to be heard and to defend himself before the measure is imposed on him or her.

#### 4.4. Implementation of the Ethics Policy

- Human Resources Managers have to regularly monitor compliance with the Ethics Policy and present their findings to the Management Board of Eesti Gaas.
- In the case of any question or concern relating to the application or interpretation of the Ethics Policy, every employee is free to seek the advice from his or her immediate superior, human resources manager or the working environment representative. Inquiries, complaints or feedback from external interested parties should be sent to published press contacts of the company.