

Principles of responsible business conduct

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1. Introduction

AS Elenger Grupp is one of the largest energy companies in Estonia that benefits from long-standing experience and with its subsidiaries forms the Elenger group (hereinafter **Elenger**).

The company's principal area of activity is the provision of different energy solutions, while playing a significant role in society in advocating a more economic use of resources and promoting economic growth and social welfare. Elenger's business activity directly and indirectly affects the markets and communities in which it operates.

Elenger's long-term goals consist in good repute and profitable business built on integrity and accountability. Elenger observes and adheres to legislation of the country in which the company has its registered office.

For Elenger, responsible business means establishment of and adherence to long-term economic, ethical, social, and environmental values. In its activity, Elenger uses a broad-based business model and focuses on transparent and lawful business, valued people, equal treatment, community welfare, accountable cooperation partners, and the surrounding environment.

Elenger's fundamental values include expediency, innovation, coherence, and accountability.

Upon entry into force of this document, the previous "Principles of Responsible Business of the Eesti Gaas Group", No. 1-7/19-20, will be repealed.

2. Objective

The purpose of this document is to highlight the principles of responsible business conduct to inform employees and cooperation partners and to ensure the sustainability of Elenger.

3. Scope

The principles of responsible business conduct apply to Elenger's business activities and operations around the world. Compliance with these instructions is mandatory for all Elenger employees. We also expect our partners and suppliers to adhere to the principles provided herein.

4. Responsible business conduct

Elenger sees sustainable development as a significant integral part of value creation for customers, employees, interest groups, and society. Elenger is convinced that companies operating on the principles of sustainability and accountability are more successful in the long run. Elenger's goal is to create long-term monetary, ethical, social, and environmental value. Elenger tackles such aspects of accountability which are significant and meaningful for Elenger as an energy company and for market in which Elenger operates.

Elenger:

- bases in its entire activity relies on the principles of sustainability and accountability, being responsible for its activities and implementation of its values and aspiring to openness and transparency;
- influences through dialogue and develops solutions and offers that provide Elenger's customers, the community, and Elenger itself with the opportunity to make instrumental contributions in a sustainable future;
- manages risks, including environmental, social and governance-related risks;
- contributes to the development of society and future generations.

5. Managing a responsible business

Elenger integrates sustainability and accountability related issues into its day-to-day activity, implementing a broad-based business model. This encompasses ascertainment and implementation of opportunities for positive influence as well as prevention and reduction of any adverse effects resulting from Elenger's activity or transactions or use of supplied products and services. Elenger's goal in directing and motivating its employees and contractual partners is to raise their awareness and advance responsible business conduct related knowledge and innovation in all of the company's functions. In managing responsible business conduct, Elenger has set the following priorities:

People

Elenger is a reliable employer. The group has a good reputation and motivates its people to promote Elenger's values and adjust the organization to meet future needs. Elenger ensures for its employees a safe and healthy working environment and corresponding training if required. The overall objective is to prevent accidents at work and reduce the time spent away from work due to accidents/illness.

Elenger establishes opportunities for everyone to develop professionally and personally. Elenger helps each employee feel valued and acknowledged, involved and connected, knowing that their knowledge and skills have been put to maximum use.

We treat everyone fairly and equally in a non-discriminatory manner. We value our employees, irrespective of their gender, race, religious beliefs, and social background. Elenger does not use in its enterprise child labor, forced or compulsory work.

Our people care about each other and communicate with each other and persons external to the group in a kind and polite manner.

Company social responsibility

We value people, community, and the surrounding environment. We involve future generations and educate the community about the group's areas of activity through campaigns and public presentations. We communicate with social organizations and authorities, contributing in communal development. Through active partnership we support young people and their opportunities for development, exercise, and business.

Professionalism and integrity

We carry out our work professionally, diligently and conscientiously, while complying with all applicable laws, regulations and standards. We always endeavor to give our best and we keep our promises.

Investments

We ensure accountable investment decisions and transparency of investments. In deciding investments, we are guided by aspects of environmental responsibility, social responsibility, and accountable management.

Integrity of documents and information

Every Elenger employee is personally liable for the information they provide. All Elenger employees must guarantee that information provided by them both internally and externally, incl. information documented via IT systems, is reliable, true and correct, and complete for customers.

The same principle applies to documented labor, financial, legal, and tax information filed with governmental and supervisory authorities.

Confidentiality and protection of personal data

Elenger highly values confidentiality and protection of personal data. We adhere to general principles of protection of personal data, GDPR based rules, and Elenger group's principles of use of personal data.

We treat all of the information obtained during the course of providing Elenger's services as strictly confidential and we keep all data strictly secret. All of our employees take seriously the protection of any information they hold, thereat ensuring that their subordinates keep such information confidential. It is everyone's duty to make sure that confidential information is protected with corresponding appropriate safeguards that enable access only by authorized persons.

Communication with the media and the public

Elenger advances active communication to strengthen the company's reputation among its customers and the public. Media relations fall within the area of responsibility of the group's Marketing and Communications Department. To prevent the spreading of misleading or confidential information, media related communication is undertaken via the Marketing and Communications Department.

Cybersecurity and crime prevention

We ensure cybersecurity, which includes data security. With our activities, we combat money laundering, fraud, and financing of criminal activity.

Combating corruption

Elenger has zero tolerance for all forms of corruption and bribery. Elenger has developed separate document, „Anti-corruption instructions“.

Environmental impact

The aim is to reduce Elenger's direct impact on the environment by using more energy-efficient solutions and reducing waste through recycling. The disposal of waste (incl. hazardous) is carried out in accordance with the Waste Act and through companies with relevant permits. Elenger prioritizes employee awareness of environmental safety. Elenger promotes employee participation in voluntary events such as planting of trees etc.

We limit Elenger's indirect environmental impact related to the products and services provided by Elenger and the cooperation with suppliers to reduce adverse effects and increase beneficial effects.

Consumer interests

Elenger ensures that the goods and services it offers are in accordance with the agreed or statutory requirements to ensure the health and safety of the consumer and, if necessary, are marked with a label warning of health risks, product safety and information labelling. Elenger refrains from providing misleading information to consumers and handles and resolves consumer complaints fairly and as quickly as possible. Elenger complies with the consumer's personal data and privacy protection.

Protection of intellectual property

Elenger adheres to requirements of protection of intellectual property.

Competition

Elenger does not conclude such agreements between market participants which restrict free competition. Elenger operates in accordance with competition laws.

6. Management

Decisions concerning Elenger's strategy and sustainability aspects are made by the Supervisory Board of AS Elenger Grupp. The Management Board of AS Elenger Grupp decides on the principles of sustainable business and their implementation in accordance with Elenger's strategy.

7. International agreements

Elenger operates in all markets in accordance with the laws, principles and rules established in the organization, and adheres to high ethical values, internationally recognized human rights standards and working practices.