

Ethical reporting channel - instructions

1. Our Code of Ethics - Ethical reporting channel

Helen Group's ("Helen") success is built on responsible business practices, the basic principles of which are documented in Helen's Code of Ethics. Helen's Code of Ethics is part of Helen's corporate culture that supports the success of our business. We value an open atmosphere, high ethical standards as well as respect for our personnel and others involved in our business. You play an important role in our success.

Our ethical reporting channel ("channel") provides everyone with a possibility to confidentially report suspicions of misconduct. It is important for Helen's operations that everyone reports suspected internal or external misconduct that does not comply with Helen's Code of Ethics. The channel is an important tool for detecting potential acts of misconduct and an early warning system with which we aspire to reduce risks and uphold as well as ensure the implementation of the Code of Ethics.

2. When to blow the whistle?

Anyone can submit a report through the ethical reporting channel, if they suspect or become aware of misconduct or conduct that does not comply with Helen's Code of Ethics (<https://www.helen.fi/en/company/helen-ltd/about-us/about-helen/eettiset-toimintaperiaatteet>) and can have serious consequences for our organisation or an individual person.

Reports of suspected misconduct may concern, for example:

- ✓ Suspected financial crime (such as the giving or receiving of bribes, and fraud)
- ✓ Conduct in breach of competition law
- ✓ Suspicious transactions/assignments in the energy derivatives market
- ✓ Market manipulation, insider trading, and such in the wholesale energy market
- ✓ Significant breaches of environmental rules and pollution of the environment
- ✓ Serious security breaches
- ✓ Gross safety deficiencies
- ✓ Forms of discrimination and harassment that cannot be reported by following the existing processes

The whistleblower does not need to have evidence to support their concerns, but the report must be made honestly and in good faith. Intentionally reporting false or malicious information is considered a serious offence.

3. How to blow the whistle?

There are different ways to raise a concern:

- ✓ **Option 1** Report your suspicions to a supervisor or manager in our organisation.
- ✓ **Option 2** Openly or anonymously reporting through the channel at:
<https://report.whistleb.com/en/helen>

If you wish to report your suspicions of misconduct anonymously, you will remain anonymous throughout the processing of the report. The reporting process is encrypted and password-protected, the persons handling the report are bound to confidentiality. The channel is administered by our external partner, WhistleB, who has no access to the password-protected material.

4. The investigation process

PROCESSING OF A REPORT

Only appointed members of Helen's senior management ("member") have access to reports received through the channel. Submitting a report is secure and the messages are handled in strict confidence. During the investigation process a member may request information and expertise from other persons. These persons have access to relevant data and are also bound to confidentiality.

RECEIVING A REPORT

After receiving a report, a member decides whether to accept or decline it. If the report is accepted, appropriate measures will be taken in terms of the investigation. Please see "INVESTIGATION" below.

A report may be declined, if:

- ✓ the alleged conduct is not reportable conduct under these Whistleblowing guidelines
- ✓ the report has not been made in good faith or is malicious
- ✓ there is insufficient information to allow for further investigation
- ✓ the subject matter of the report has already been solved

If the message contains issues falling outside of the scope of these guidelines, the member should take appropriate action to resolve the issues.

INVESTIGATION

All reports are treated seriously and in accordance with these Whistleblowing guidelines.

- ✓ No member, nor anyone taking part in the investigation process, will attempt to identify the whistleblower in any way.
- ✓ A member will ask follow-up questions through the channel, if necessary.
- ✓ A report will not be investigated by anyone who may be involved with or connected to the misgiving.

- ✓ A member determines, if and how a report will be investigated.
- ✓ All reports are handled confidentially.

PROTECTION OF A WHISTLEBLOWER IN THE EVENT OF A NON-ANONYMOUS REPORT

Anybody who expresses a genuine concern will not be at risk for suffering any sanctions or personal disadvantages as a result. It does not matter if the whistleblower is mistaken, provided they are acting honestly and in good faith.

In cases of alleged criminal offences, the whistleblower's identity may need to be disclosed during judicial proceedings.

5. Processing of personal data

The processing of personal data that may be included in the reports and investigation documents is based on and necessary (in accordance with EU General Data Protection Regulation 679/2016, Directive 1937/2019 on the protection of persons who report breaches of Union law and national legislation adopted on the basis thereof) for the purposes of the legitimate interests pursued by the controller or a third party.

REGISTER CONTROLLER

Helen Ltd (Business ID: 2630573-4; Address: Kampinkuja 2, 00100 Helsinki, Finland; Tel: +358 9 6171) acts as a controller of personal data in accordance with applicable data protection legislation and its privacy policy available on its website (www.helen.fi/en).

DELETION OF DATA

Personal data included in reports and investigation documents will be permanently deleted 60 days after the completion of the investigation, with the exception of personal data that must be maintained according to applicable laws.

PROTECTION OF, AND INFORMATION TO, A PERSON SPECIFIED IN A REPORT

Those affected will be entitled to the right to access data relating to themselves and should the information be incorrect, incomplete or outdated to require amendments or deletion of data.

These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the report.