

ETHICAL GUIDELINES

1. NON-SANCTIONED GUIDELINES

- 1.1** These Ethical Guidelines supplements the legally sanctioned "Rulebook for Nord Pool's Physical Markets" (the "Rulebook"), requiring high standards of conduct from the Participants and Clearing Customers when involved in Trading.
- 1.2** The Market Council of Nord Pool will handle any non-compliance in respect of the Ethical Guidelines and may thereafter give an official statement. If such non-compliance constitutes no violation of any laws, regulations or provisions in the Rulebook, Nord Pool cannot effectuate any formal sanctions.
- 1.3** Changes to the Ethical Guidelines can only be made by approval of the Market Council.

2. SCOPE

- 2.1** The Ethical Guidelines apply to all Exchange Members/Participants and Clearing Members/Clearing Customers in the markets organised by Nord Pool Spot AS, Nord Pool Finland Oy, Nord Pool ASA and Nord Pool Clearing ASA (in these Ethical Guidelines referred to as "Nord Pool") regardless of their function or geographical location.
- 2.2** If the Ethical Guidelines are in conflict or inconsistent with (and not merely supplement) laws, regulations or the Rulebook, these laws, regulations or provisions of the Rulebook shall precede.

3. PURPOSE

- 3.1** The activities in the markets organised by Nord Pool affect great economic values and are vital to the supply of energy in the relevant countries. Nord Pool, the Participants and Clearing Customers are therefore dependent of strong reliance, and that the public in general have confidence in their ethics and good standards of conduct.
- 3.2** These Ethical Guidelines shall contribute to maintaining a strong public confidence in Nord Pool and Participants and Clearing Customers being active in the countries where Nord Pool operates.

4. GENERAL PRINCIPLES

- 4.1** Participants and Clearing Customers shall act responsibly and seriously in order to maintain strong public confidence in them and in the markets of Nord Pool. It is the responsibility of the board, management and employees of Participants and Clearing Customers to ensure that this will be done.
- 4.2** Participants and Clearing Customers shall be in compliance with laws and regulations and the Rulebook as well as in compliance with general standards for good business practice and good professional behaviour.

4.3 Participants and Clearing Customers shall never compete with its colleagues in an unfair manner.

4.4 A good way to measure whether a line of action is in accordance with the above mentioned standards, is whether it can be justified in a way acceptable to others. Good business practice and good professional behaviour is measured and supported through good documentation and keeping of journals documenting relevant conduct, and by openness on the intentions with decisions carried out.

5. RELATIONS TO CLIENTS

5.1 A Participant acting on behalf of Clients as intermediary or agent, or in any other way performing investment services as defined in the Investment Service Directive (EEC Directive 1993/22) and applicable state legislation, shall endeavour to protect the interest of the Client in all cases where there are possible conflicts between their own interests and their Client's best interests, and shall make sure that Clients are treated equally and non-discriminatory.

5.2 The interests of the Clients shall be attended to in a correct and loyal manner, in accordance with national legislation and international standards as to good business practice when performing investment services.

6. MARKET BEHAVIOUR

6.1 All transactions made in Nord Pool's markets shall be performed with a genuine and generally acceptable business purpose.

6.2 No fictive transactions and mock agreements shall be carried out, and Participants Clearing Customers must never give false or misleading expressions of their intentions with trades or bids and offers in the markets.

6.3 No bids or offers or trades shall be presented to the market with the purpose of misleading other Participants and Clearing Customers. Sudden changes in market behaviour that is not motivated by serious commercial or technical circumstances must not occur.

6.4 Any Participant or Clearing Customer that is a leading player in respect to the relevant supply or demand for electricity or electricity derivatives must assure that they do not in any inconsiderate way affect the price development in the relevant markets.

6.5 No misleading information must be given that can contribute to make a false and incorrect or misleading picture of the market situation.

7. OTHER DEMANDS TO THE PARTICIPANTS AND CLEARING CUSTOMERS IN THE MARKET

7.1 Participants shall assure that their management and board of directors have proper knowledge of and complies with laws, regulations and relevant rules, and passes relevant knowledge on to their own employees within their respective areas of responsibility.

- 7.2** A Participant shall appoint a person who will be responsible for overlooking the ethical standards within the company (a compliance-function), so that they make sure that the board and the employees at any time have knowledge of the current regulations for their area of activity.
- 7.3** Participants and Clearing Customers shall establish internal ethical rules for their employees, and give directions to how to act in situations raising ethical questions, or whom they can address in situations of doubt. The guidelines should also give answers to questions in practical situations where other rules and regulations are unclear and/or insufficient. The internal guidelines should also give directions on the employees' possible trading with instruments. The employees should continuously receive information and be educated in the ethical questions relevant for their work.