

Code of Conduct

Appendix to Supplier Contracts



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1. General terms

Parties in this Code of Conduct are hereafter referred to as “Tibber” and “Supplier”.

Tibber’s purpose is to empower consumers to use energy smarter, by using technology to reduce consumption and costs. Acting responsibly as a business and contributing to a more sustainable development is rooted in our vision, business model and daily operations.

This Code of Conduct outlines Tibber’s approach to sustainability, and it states the minimum requirements that apply for all business relationships and is deemed part of all agreements between Tibber and its Suppliers. Every chapter starts with a reference to how Tibber works with the relevant topic, before it states our expectations towards Suppliers. All paragraphs in **bold** state what the Supplier is obliged to undertake. All paragraphs in ***bold italic*** state recommendations.

Tibber may at any time demand self-assessments and documentation to monitor the Supplier’s compliance with the Code of Conduct. Tibber can call for an annual workshop to address challenges and opportunities relevant to sustainability in relation to the Supplier.

As a Supplier to Tibber you undertake to make available relevant, balanced and transparent documentation of your work with sustainability.

As a Supplier to Tibber you agree to have annual workshops focusing on sustainability, where the agenda is sustainability targets, performance and improvements, but also common interests and potential joint projects.

2. Tibber’s expectations - Approach to sustainability

Sustainable development has been defined as a development that meets the needs of the present without compromising the ability of future generations to meet their own needs (Our Common Future, 1987). This calls for concentrated efforts towards building an inclusive, sustainable and resilient future for people and the planet.

In Tibber, we have defined the scope of our responsibility to contribute to sustainable development through a 4 step process:

1. Identifying and analyzing stakeholders. The reasonable expectations and interests of stakeholders are a key reference point for the scope of Tibber’s responsibility.
2. Measuring performance in relation to context. Tibber’s responsibility performance is measured against a broader context of global sustainability.
3. Reporting on direct impacts and influence on stakeholders. The most material aspects of Tibber’s responsibility are subject to annual reporting.
4. Evaluating and improving performance, with a long term ambition to lead the way in work with sustainability. Review of historical data helps with continuous improvement of Tibber’s responsibility performance.

The 17 UN Sustainable Development Goals (SDGs) address the global challenges we face in these efforts, including those related to poverty, inequality, climate, environmental degradation, prosperity, peace and justice.

Based on the identification of our stakeholders and an analysis of materiality, Tibber's approach to sustainability concentrates on the SDGs that are especially relevant to Tibber:



The UN Global Compact (UNGC) is a generic platform offering insights, networking and tools for corporations working systematically with contributing to sustainable development. Within this framework, three aspects of sustainability is considered material for businesses, independent of sector:

1. Environmental footprint
2. Social impact
3. Corporate governance

To secure long term commitment, Tibber is a member of the UN Global Compact, and annually reports on a Communication of Progress (CoP) to meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption.

As a Supplier to Tibber you undertake to identify and analyse your stakeholder expectations, to identify material aspects of your contribution towards a sustainable development, to demonstrate a systematic approach to meeting this responsibility and to be transparent about progress results.

As a Supplier to Tibber you are recommended to commit to a member organisation and/or comply with relevant reporting standards on sustainability. Organisations such as the UN Global Compact or equivalent are accepted.

3. Tibber`s expectations - Material aspects

As a result of the materiality analysis, Tibber has defined 4 strategic priorities in our work with sustainability, covering all the relevant SDGs and UNGC Business Principles. The following is a list of expectations towards suppliers within each of the 4 strategic priorities.

3.1 Climate action and environmental protection

Relevant SDGs: 7,11,12,13

Relevant UNGC Business Principles: 7,8,9

- Carbon accounting

Tibber track, measure and report carbon footprint on a quarterly basis. Once a year targets are set for reduction of greenhouse gas (GHG) emissions in scope 1-4.

As a Supplier to Tibber you undertake to track, measure and report your GHG emissions in scope 1-3, to work systematically reduce it and seek third party verification of your carbon accounts. Certification from the GHG Protocol or equivalent standards are accepted.

- Life Cycle Assessments

Tibber conducts Life Cycle Assessments (LCA) for our inhouse developed hardware in order to identify global warming potential (GWP) and actions to reduce this from production, transport or use of our products.

As a Supplier to Tibber you are recommended to systematically identify and analyse the life cycle costs from your products, to identify, plan and take actions to reduce it, and to seek third party verification. Certification from ISO 14044 or equivalent standards is encouraged.

3.2 Good and fair business practices

Relevant SDGs: 8,12

Relevant UNGC Business Principles: 1,2,3,4,5,6,10

- Labour and Human Rights

All employees in Tibber have an employment contract compliant with relevant labour, HSE and human rights regulations. Tibber welcomes diversity in our workforce, with employees from 19 nationalities (2021). 36% of employees are women, 50% in the top management team (2021). Tibber`s Head of People is responsible for non-discrimination practices and employer welfare.

As a Supplier to Tibber you undertake to comply with all relevant labour and human rights regulations in the countries where you operate.

As a Supplier to Tibber you are recommended to work systematically to secure diversity, non-discrimination and employer welfare, and to seek third party verification. Certification as B-Corporation or equivalent standards is encouraged.

- Ethical business practices and anti-corruption

As a digital B2C energy company, Tibber handles both digital power trading, large volumes of consumer data and personal information about customers.

In our overall business risk assessments we have concluded that

1. breach of data protection and privacy
2. breach of routines in power trading

represent some of the most prominent risks related to our operations.

To mitigate these risks, Tibber has internal governance policies for

1. IT systems
2. Privacy and data protection
3. Power trading

These policies regulate roles, responsibilities, maintenance routines and internal audits of Tibber's internal processes, security and compliance work. The IT-policy also regulates access control and operations related to platforms and IT systems. The Personal data protection programme secures control with all data processing, and that we have technical, organizational and contractual measures for good security and compliance. The Privacy policy is communicated to customers in a thorough way when signing up.

As a Supplier to Tibber you undertake to identify and analyse the overall business risks related to your operations, with a special focus on the potential for unethical and corrupt practices.

As a Supplier to Tibber you are recommended to work systematically to mitigate risks related to unethical and corrupt practices, and to seek third party verification. Certification from ISO 37001, 37301 and 31000 or equivalent standards is encouraged.

3.3 Positive social impact

Relevant SDGs: 5,8,10

Relevant UNGC Business Principles: 1,2,3,4,5,6

- Human Resources development

Tibber supports a lifelong learning process for all employees, and focuses on building a strong company culture with sustainability at its core.

All new employees go through sustainability training during their first week in the company, and all employees are offered coaching to make sustainable lifestyle changes.

As a Supplier to Tibber you are recommended to actively encourage your employees to have a sustainable lifestyle, and to facilitate individual learning and development within this area.

3.4 Stakeholder engagement

Relevant SDGs: All

Relevant UNGC Business Principles: All

- Stakeholder communication

In Tibber we believe that our stakeholder communication with a sustainability perspective will inspire more consumers to use energy smarter by using technology to reduce consumption and costs.

Our first priority is developing user-friendly and accessible products and services that inspire consumers to reduce their home energy consumption.

We also communicate frequently to our stakeholders about how they can have a more sustainable lifestyle, and we use independent research and Tibber data to support that communication.

As a Supplier to Tibber you are recommended to make your efforts in contributing to sustainable development transparent for stakeholders and the public.

3. Tibber`s expectations - Management approach

In Tibber, we consider our work with sustainability as a 4 step annual cycle of continuous improvement:

1. Planning for progress - setting goals
Sustainability goals are aligned with Tibber`s overall business goals, stakeholder expectations, the relevant SDGs and the UNGC Business Principles.
2. Daily operations - deployment of plans
Tibber has a dedicated team responsible for coordinating our work with sustainability, but daily operations and data collection are owned by the relevant departments.
3. Assessment of performance
Tibber conducts annual evaluations of our progress, in relation to business goals, stakeholder expectations, the relevant SDGs and the UNGC Business Principles.
4. Review of plans - setting new goals
As part of that evaluation, Tibber sets new goals. Quarterly and annual action plans are made to facilitate the work according to the new goals.

The Board of Directors is involved in long term goal setting, and to secure the integration of sustainability in the overall business strategy.

As a Supplier to Tibber you undertake to integrate sustainability in your long term business goals and strategies, to set SMART short term sustainability goals and to work systematically with improvements to secure progress.