



ST1 PARTNER CODE 2020

**We are on a
journey together**

FOREWORD BY THE CEO

We are all on this journey together



We at St1 thrive from integrity, transparency and open dialogue. We play by the rules and ethics compliance is everyone's responsibility.

We respect each other and our partners and we conduct business in transparent and responsible manner. St1 Code of Conduct together with our Nordic values sets the ground rules for us and our partners. This revised Code acts according to UN Global Compact's ten principles and supports our vision of being the leading producer and seller of CO₂ -aware energy, and our mission in enabling positive societal impact through all our operations. This is also one step forward in creating a unified rule book and bringing responsible business principles more transparent in our daily operations. We all shall lead through example and therefore it is our utmost duty to study this Code of Conduct carefully while reflecting our own ways of working. We are accustomed to constructively challenge old truths, and continuously improve in every aspect of the business. Therefore,

making sure these ethical principles are followed by us and our partners in daily operations and decision making is not only important, but a strong part of our culture, in which we take ownership and responsibility for our work in enabling more sustainable future. This code of conduct applies to St1 Nordic Oy, the companies belonging to its Group and St1 Finance Oy and all our Partner's along the value chain. Together -we write the St1 Story - with respect for our business, our customers, our partners, one another and the environment we operate in.








Henrikki Talvitie, CEO

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ST1 CODE OF CONDUCT SETS THE GROUND RULES FOR US AND OUR PARTNERS.

- ✓ **It is everyone's responsibility at St1 to be familiar with the Code of Conduct and respect its principles in all daily operations.**
- ✓ **This Code of Conduct Code shall guide decision-making and encourage responsible action at St1.**

The Code of Conduct is supplemented by:

-  **St1 Code of Conduct**
-  **St1 Partner Code**
-  **St1 Human Rights Policy**
-  **Employee Guide to the Code of Conduct**
-  **Partner Guide to the Partner Code**

St1's vision is to be the leading producer and seller of CO₂-aware energy. We at St1 thrive from integrity, transparency and open dialogue.

We play by the rules and ethics compliance is everyone's responsibility. We respect each other and our partners and conduct business in transparent and responsible manner. St1 Code of Conduct sets the ground rules for us and our partners. Our partners are an integral part of our value chain and our vision. Therefore enabling positive societal impact and create more sustainable future depends not only on our own actions but also our partners, whom we wish to commit to the same principles and standards we have set for our business operations.



Further Guidance on how to interpret the Partner Code and act according to the principles set is provided within the Partner Guide.

HUMAN RIGHTS

01

We are all the same



Internationally proclaimed human and labour rights

Our human rights commitment is based on the UN Guiding Principles on Business and Human Rights (UNGPR) in respect with the fundamental rights laid down in the International Bill of Human Rights as well as the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. We expect our Partner to adhere these same fundamentals within their sphere of influence.

Fair wages and working hours

We expect our Partner to ensure fair employment. The Partner shall adhere to applicable laws regarding employment, and ensure employees rights to proper wages, favorable working hours, appropriate holidays and the right to social security.

Freedom of association and collective bargaining

We expect our Partner to respect the right of all employees and workers to freely and voluntarily establish and join a trade union of their choice for the promotion and defence of their occupational interests, without fear of intimidation or reprisal, in accordance with national law.

Equal and fair treatment without fear of discrimination

Our operations are based on equality, and professional and fair behaviour towards each other. No bullying and harassment is tolerated in any form. We expect our Partner to adhere same principles, and provide equal opportunity and treatment in employment and not discriminate against anyone based on race, gender, sexual orientation, religion, ethnic origin, citizenship status, age, health, marital status, pregnancy or any other condition that could lead to discrimination.

Health and safety

We expect our Partner to respect our commitment to offer a safe working environment for all people within our value chain. The Partner shall provide its employees a healthy, safe and secure workplace in compliance with all laws and regulations applicable to its operations.

LABOUR

02

Working on an equal footing



Forced labour and modern slavery

All employees involved in St1's value chain have the right to be free from slavery, servitude and forced labour, or any exploitation depriving the basic human rights. The Partner shall refrain from all forms of bonded and indebted labour, such as withholding wages and depriving the freedom of a worker through physical confinement or forced overtime. It is prohibited for our Partners to charge recruitment fees from their employees, falsify indebtedness, subject employees to threats, restrict the physical freedom, or withhold the workers' personal documents, such as passports, without the permission of the employee who must maintain the access and right to take back the documents at any time. The Partner shall ensure that all employees are made aware of the key terms of their employment prior to commitment to work, and all illegible and illegal work contracts are strictly prohibited.

Child labour

St1 respects the distinct rights of children and requires these rights to be realized throughout our value chain. The Partner is prohibited to employ workers under the minimum age of 15, as defined by the International Labour Organization. Children have the right to education, development and health, and all Partners within the St1 value chain shall not have adverse impacts on these rights. All forms of slavery, illicit activities and work likely to harm the health, safety or morals of the child as a consequence of its nature or the circumstances under which it is carried out are strictly prohibited. We oblige all our Partners in adhering to minimum age provisions of national labour laws and regulations and, where national law is insufficient, taking account of international standards. In addition, exercising influence on subcontractors, suppliers and other business affiliates to combat child labour in areas where potential child labour exists is highly recommended.

03

loving our planet



We care for the environment

Environmental sustainability is utmost important for us at St1, and we expect our Partner to support a precautionary approach to environmental challenges. The Partner is advised to recognise and monitor the environmental impact of its operations, and encouraged to implement actions for continuous development. The Partner shall comply with all relevant environmental legislation and regulations as well as applicable standards and environmental permits in the jurisdiction of the operations. We at St1 undertake initiatives to promote greater environmental responsibility, and we expect the same from our Partner.

ANTI-CORRUPTION

04

and being
trans-
parent



**Working against corruption
in all its forms**

We at St1 have zero tolerance towards bribery and corruption, and we expect the same from our Partner. The Partner shall ensure that its directors, employees and third parties acting on its behalf do not offer, promise, give or accept any bribes, or make or accept improper payments to gain improper advantage and advance any actions.

05

In all our actions

1.

Compliance with laws and regulation.

We expect our partners to comply with all relevant laws and regulations in the context of each operation and country of operation. Everyone willing to conduct business with us, regardless of the country they operate in, shall respect the same legal principles. These are considered as the minimum standards, and we strive to go above and beyond whenever possible. We therefore choose to follow voluntary principles as outlined in our company policies, which our partners are also expected to respect. Whether a requirement of this Code would contradict national laws or regulation, the Partner is expected to comply with whichever is more stringent.

2.

Participation in political or religious activity.

We actively engage in societal discussions but do not offer financial support to political parties and entities associated with them or make any direct or indirect political or religious contributions. We expect our Partners not to utilize their position or our partnership in promoting political endeavours contradicting the laws and regulations, or the principles set within our Code of Conduct.



St1 is committed in solving global energy challenges while creating positive societal impact.

3.

Promoting good corporate governance.

We avoid conflicts of interest between the company and any individual, and we expect the same from our Partner. We expect our Partner to disclose any potential or existing conflicts of interest, whether it shall be directly or indirectly related to St1 or its employees.

4.

Fair competition

We take competition law and the right to fair competition seriously, and we expect the same from our Partner. The Partner or its employees shall not engage in any anti-competitive practices.

5.

Transparency and reacting to non-compliances

We at St1 communicate our operations and discoveries transparently and openly, and we wish the same from our Partners. We encourage our Partner to ask questions, make proposals as well as actively bring up non-compliances. Immediate notifications of non-compliances enable taking corrective actions and remediating the impact of non-compliances as quickly as possible. Our Partners can report any non-conformities via our SpeakUp channel.

When to report?

Do not hesitate to seek guidance. If you are not sure about an action or a decision, ask yourself:

- ✓ Is it legal?
- ✓ Am I comfortable with this?
- ✓ Does it do harm for our employees, brand or other stakeholders?
- ✓ Does it do harm to the environment and society?
- ✓ How would it look, if it would be reported to the media?



St1 SpeakUp service is a global helpline via which you can report irregularities anonymously.

You can either record your information by calling or via website specified for the use of St1.

You can record your concerns via online form: www.speakupfeedback.eu/web/st1nordicSt1

Or by calling a country specific, toll free number.

FI: 08001-13031

SE: 020-798813

NO: 800-18333

While recording, do insert the access code 61240.

More information in SpeakUp Policy