



What we believe in and how we work



PARTNER GUIDE TO THE CODE OF CONDUCT 2020

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. 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

Partner Guide

This Partner Guide offers guidance on how to interpret the Partner Code and act according to the principles provided within this Guide.

The Partner Code outlines the requirements for St1's partners conducting business as a part of St1's value chain. Our partners are an integral part of our value chain and our vision. Therefore, enabling positive societal impact and creating 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.

Who do we work with and for?

Personnel

We believe that professional excellence of our personnel is a valuable competitive asset. Maintaining the edge in this area requires us to recruit and retain the best possible employees, and maintain the excellence with training. We expect our partners to also value their personnel's professional excellence and wellbeing, and to provide needed training and development to maintain their excellence. Together we create a safe workplace conducive of mutual respect and appreciation.

Business partners

We only work with suppliers, distributors and business partners who show consideration for people and environment. When we select our business partners, we expect them and their business partners to be committed to our Code of Conduct or similar ethical standards and to actively support its implementation within their sphere of influence.

Customers

Our success depends on how well we can fulfil the shifting needs of our customers. We have committed to innovation, and we expect that also our partners are committed to responsibility in offering high-quality products and services at competitive prices.

Society

We wish to be a responsible corporate member of society. Above all, we have dedicated ourselves to sustainable and responsible operations. We expect that also our partners comply with all relevant legislation, regulations, and official orders.



Enabling positive societal impact and creating more sustainable future depends not only on our own actions but also our Partners.

Our responsibility to follow the Code

We work with business partners, such as joint ventures and suppliers, that share our commitment to responsible operations, environmental sustainability, and compliance.

We expect all our employees, management, members of the Board, and business partners to act in accordance with the Code. If they have not met our expectations or contractual commitments, appropriate measures will be taken.

How to follow the Code?

Partners' responsibilities:

- Read and familiarize yourself with the Partner Code
- As a business partner, we expect you and your business partners (e.g. suppliers, sub-contractors and other business associates) to be committed to our Partner Code or similar ethical standards
- Ensure that your and your Partner's work is safe, ethical, and consistent with the laws and regulations
- Speak up if you become aware of possible violations of laws, regulations, or the Partner Code
- Cooperate when responding to an investigation or audit
- Be positive role models that act according to the Partner Code
- Help your team members to understand and operate according to our Partner Code
- Fulfil requirements and hold people accountable



How to speak up?

We encourage all our employees and partners to report suspicions of irregularities and misconduct in the first instance internally to any of the business area managers or HR.

In case the issue needs to be reported in secrecy and anonymously, The SpeakUp® system gives all employees, contractors, partners and other concerned individuals an opportunity to raise concerns in a confidential manner and report any misconduct that may occur within St1's value chain. St1 SpeakUp system is a global helpline that is administered by an independent company.

The service is anonymous. Any report you make will be fully kept confidential in consistent with law and good business practices. Please read further instructions from St1 SpeakUp Policy.

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



You can record your concerns via online form:

<https://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.



General Business Principles

Compliance with laws and regulation.

We act in compliance 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.

Our Partners

- We expect our partners to comply with all relevant laws and regulations in the context of each operation and country of operation.
- Whether a requirement of this Code would contradict national laws or regulation, the Partner is expected to comply with whichever is more stringent.
- If you have any questions regarding laws and regulations, speak to your Legal presentation or your St1 contact person who will contact the Compliance & Legal

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.

Our Partners

- 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.

Promoting good corporate governance.

We avoid conflicts of interest between the company and any individual, and we expect the same from our Partner.

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.

Conflict of interest can occur in many ways, such as:

- Outside jobs and affiliations
- Working with close relatives, especially involved in politics
- Having an intimate relationship with St1 employee who can influence decisions such as pricing, performance rating or procurements
- Investments that may influence your judgment
- Using information obtained by virtue of your position in the company on the market

Fair competition

We take competition law and the right to fair competition seriously, and we expect the same from our Partner.

Our Partner

- The Partner or its employees shall not engage in any anti-competitive practices.

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.

Our Partner

- 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.



Human rights

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.

Our Partner

- We expect our Partner to adhere these same fundamentals within their sphere of influence and react immediately if any human rights abuses shall occur.

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.

Our Partner

- 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.

Our Partner

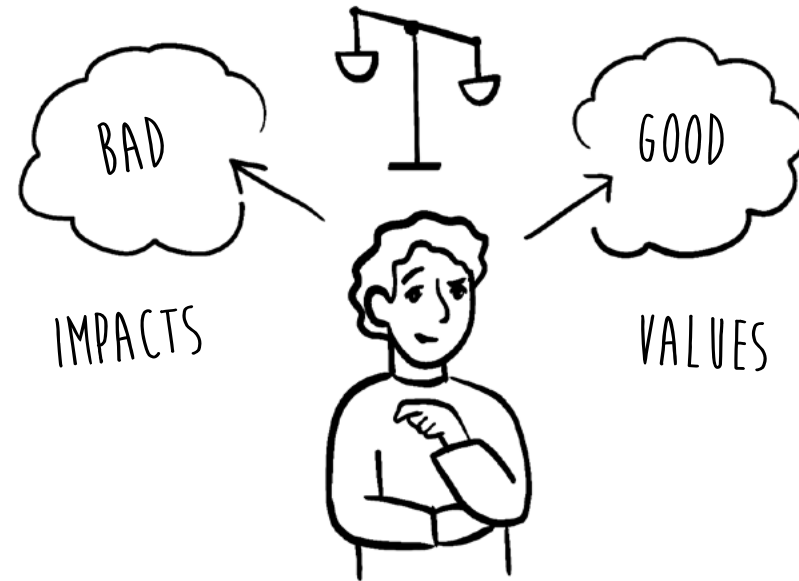
- The Partner is prohibited to employ workers under the minimum age of 15, as defined by the International Labour Organization. Children have the right to education, development and health, and all Partners within the St1 value chain shall not have adverse impacts on these rights.
- All forms of slavery, 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.



Positive societal impact to communities

St1 acknowledges how the operations in its value chain, besides having direct impacts on workers and their families, can indirectly impact wider communities. These can, for example, include environmental, health and social impacts. All communities have the right to social and economic development, and the operations should by no means hinder this. People have the right to social security and the realization of economic, social and cultural rights.

St1 aims to not only reduce the risk of adverse impacts, but the operations can in fact assist the development of the communities. For instance, operations can provide new economic opportunities. St1 further aims to ensure all people working in its value chain have adequate social rights, such as providing supporting services to the workers, which may encourage social progress also in the wider community. All human rights impact assessments that St1 will conduct include finding out whether there are affected minorities. If this is the case, these communities should be involved in the impact assessment, and the realization of their human rights should be monitored with special attention.



Q:

You have enquired about using the waste of foreign food industry as raw material and it turns out that the waste “just disappears during the night”. The truth is that the locals come and pick up the waste for their own use. Would you in this situation start furthering your own business opportunity?

A:

No recommended. We only use surplus in our choice of raw materials. If the waste or surplus is part of another value chain, that is not where our business is.

Labour rights

Fair wages and working hours

We adhere to applicable laws regarding employment, and ensure employees' rights to proper wages, favourable working hours, appropriate holidays and the right to social security as stated in the national legislation.

Our Partner

- We expect our Partner to ensure fair employment within their sphere of influence.
- The Partner shall adhere to applicable laws regarding employment, and ensure employees' rights to proper wages, favourable working hours, appropriate holidays and the right to social security.



Q:

Your company has won the tender for cleaning services. In your tender, you placed the price 30 percent below the competitors. You estimated that the price could be justified with fewer workers and advanced equipment. As soon as you started with your services, the usage of the customer's facilities doubled within a short period of time, resulting in increased demand for labour. Meanwhile in your company, you have temporary layoffs and thus, far fewer employees responsible for the service. The situation leads to a bigger workload for individuals and to working overtime. Several of the employees complain about harsh working conditions, and sick leaves are increasing. However, the more sick notices you get, the greater the workload is for the remaining workers. How would you tackle this situation?

A:

Immediately revoke the temporary layoffs or hire certified cleaners from an employment agency. Initiate measuring the well-being at work as well as preparing and carrying out more realistic work schedules.

Freedom of association and collective bargaining

We respect the right of all our 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. We aim in improving the climate in labour-management relations, especially within the countries without an adequate institutional and legal framework for recognizing trade unions and for collective bargaining.

Our Partner

- 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.

We expect partner to:

- Respect the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with national law;
- Put in place non-discriminatory policies and procedures with respect to trade union organization, union membership and activity in such areas as applications for employment and decisions on advancement, dismissal or transfer;
- Provide workers' representatives with appropriate facilities to assist in the development of effective collective agreement; and

- Not interfere with the activities of worker representatives while they carry out their functions in ways that are not disruptive to regular company operations. Practices such as allowing the collection of union dues on company premises, posting of trade union notices, distribution of union documents, and provision of office space, have proven to help build good relations between management and workers, provided that they are not used as a way for the company to exercise indirect control.

Equal and fair treatment without fear of discrimination

Our operations are based on equality and our behaviour towards each other is professional and fair, and we expect our Partner to adhere these same principles.

Our Partner

- The Partner shall 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.
- All employees have the right to be treated with dignity, and harassment and bullying shall not be tolerated in any form, indirect, direct, verbal, or psychological.



We expect our Partners to ensure everyone is treated equally, whilst respecting each other and our individuality

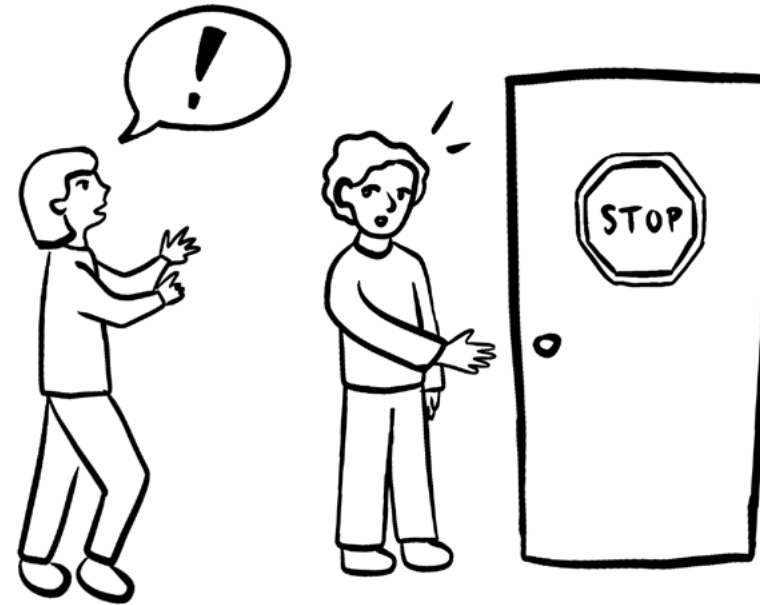
Health and safety

We are committed to offering a safe working environment for all people working within our value chain, and we expect our Partner to respect the same commitment.

We are committed and legally obligated to ensure the safety of our products. We comply with laws, regulations and standards related to product safety. We continuously monitor that our entire product quality chain meets the requirements set for it.

Our Partner

- The Partner shall provide its employees with a healthy, safe, and secure workplace in compliance with all laws and regulations applicable to its operations
- We do not tolerate any form of substance abuse at St1. Be sure that your performance is not impaired, for example by a lack of sleep or intoxicants
- We are also committed to contributing to developing the safety of our suppliers' employees by offering safety training and sharing knowledge.
- We expect and encourage business partners to comply with applicable HSSE requirements



Q:

You are in a newly established Nordic company that offers services in the maintenance and cleaning of building facades. However, your management has chosen to take some shortcuts and quickly ordered some cranes from southern Asia with different climate conditions. Furthermore, in order to lower expenses, the management has hired staff with weak English skills and without local native language skills to operate the cranes. The management tries to assure the workers that the cranes meet all the EU safety requirements, and the employees trust their words. However, you don't have any certificate or other assurance that the cranes meet the requirements for working in Nordic conditions, and you doubt whether the workers have understood the crane's instructions since you don't have a common language. How could these situations that increase the risks for your workers and business be avoided?

A:

Create stricter procedures for procurements. Furthermore, establish stricter internal and external control that falls under the auspices of the Labour Inspection Authority.

Environmental Sustainability

Environmental sustainability is utmost important for us at St1, and we expect our Partner to support a precautionary approach to environmental challenges.

Our Partner

- The Partner is advised to recognise and monitor the environmental impact of its operations and encouraged to implement actions for continuous development.
- In the case of an accident, immediately undertake effective action together with the authorities and other stakeholders
- 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.



Q:

You get an interesting proposal for cooperation from a company that collects raw materials for biofuel across Europe from several locations and transports them, according to the company, at a reasonable cost, to St1's biorefinery. Do you take up the opening business opportunity immediately?

A:

Do not rush into a partnership. Instead, ask the potential partner for an evaluation of the environmental impact of their logistics chain. We require that in all measures, the activities' overall impacts on the environment are evaluated. Sometimes, collections of small amounts from different locations causes more adverse effects than not using the raw material. Transport kilometres and single transport capacity volumes also have an impact on the evaluation. Business benefit is not the only criterion.

Anti-Corruption

We do not offer, promise, solicitate, accept or give bribes to advance actions. We at St1 have zero tolerance towards bribery and corruption, and we expect the same from our Partner.

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 nor make or accept improper payments to gain improper advantage and advance any actions.

