



St1 Partner Code



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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.

This Partner Code outlines the requirements for St1's partners ("Partner") conducting business as a part of St1's value chain. Further Guidance on how to interpret the Code and act according to the principles set is provided within the Partner Guide.

General Business Principles

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.

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.

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.

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.

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.



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

Fair wages and working hours

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, 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 our behaviour towards each other is professional and fair, and we expect our Partner to adhere these same principles. 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.

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. The Partner shall provide its employees with a healthy, safe and secure workplace in compliance with all laws and regulations applicable to its operations

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.

Environmental Sustainability

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

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.