





FOREWORD BY THE CEO

### We are all on this journey together

**FOREWORD** 



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 is built on the United Nations Global Compact's Ten Principles. and supports out vision of being the leading producer and seller of CO<sub>2</sub> -aware energy, and our mission in enabling positive societal impact through all our operations. Through aligning our due diligence processes and partner requirements with the United Nations Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises, we take one step forward in making 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, and the companies belonging to its Group. Together—we write the St1 Story—with respect for our business, our customers, our partners, one another and the environment we operate in.

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Henrikki Talvitie. CEO

ST1 CODE OF CONDUCT





#### 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



#### Our values guide our everyday actions:

#### **Transparency**

At St1, we share knowledge and information to create a culture of openness and accountability. Our commitment to transparency demonstrates our responsibility and builds trust with internal and external stakeholders.

#### **Fairness**

At St1, we conduct our business based on ethical decisions free from prejudice. Valuing fairness, we always respect human rights. We give all employees the same chance to succeed

#### Sustainability

At St1, we stretch our perspective to create long-term positive impact on people, economy and environment. In line with our vision, we take urgent steps towards increased CO<sub>2</sub>-awareness and sustainability.

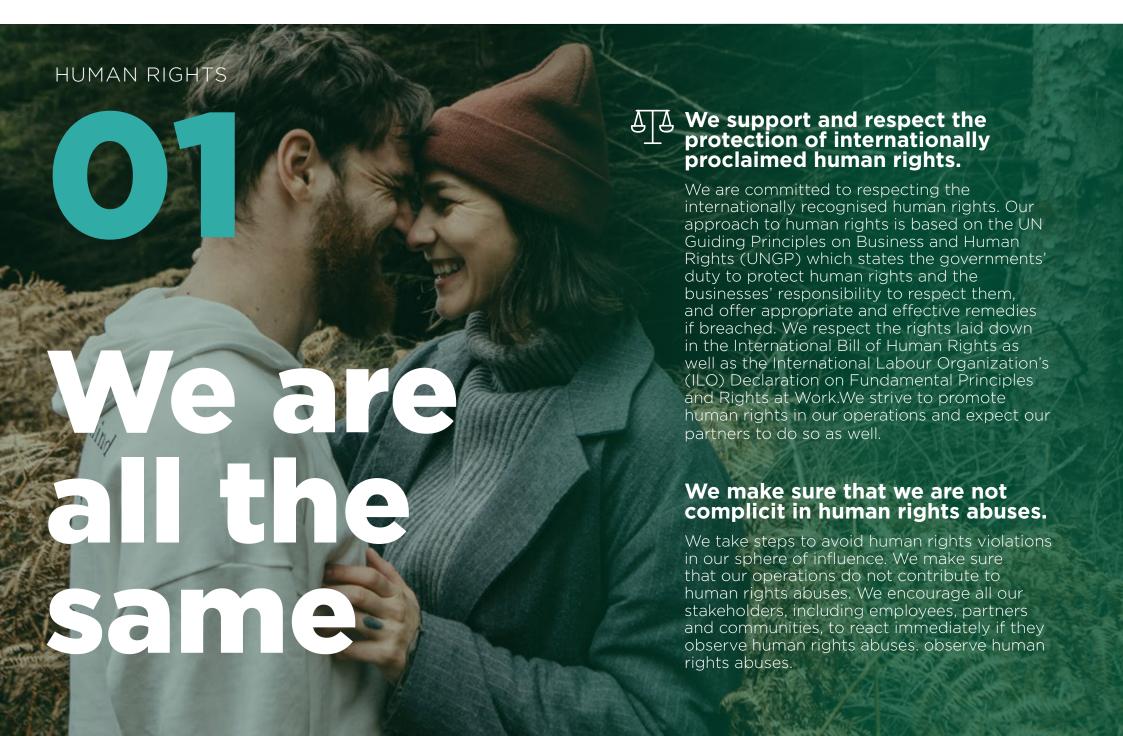
#### **Equal opportunities**

At St1, we honour social justice and respect each other's individuality. Contributors to the Nordic welfare system, we create equal opportunities and benefits to the common good.

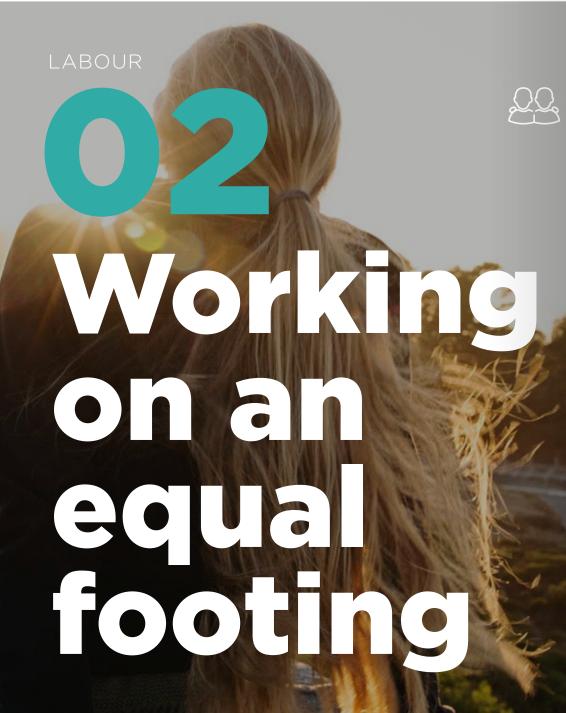
STI CODE OF CONDUCT











#### We uphold the freedom of association and the effective recognition of the right to 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.

#### We uphold the elimination of discrimination in respect of employment and occupation.

Our operations are based on equality and our behaviour towards each other is professional and fair. Responsibility of treating everyone equally rests with the entire workplace community. We do not discriminate against anyone based on race, gender, sexual orientation, religion, ethnic origin, citizenship status, age, health, or any other condition that could lead to discrimination. We value each other's work and respect each other's individuality. Harassment

and bullying are not tolerated at the workplace or in any company context.

#### We work to ensure health and safety of our employees, subcontractors and customers

We are committed to offering a safe working environment for all people working within our value chain. We are continually improving our health and safety processess and procedures. We do not tolerate any form of substance abuse at St1.

We uphold product stewardship and the safety of our products through the value chain of our operations. 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 product quality through supply chain meets the requirements set for it. We are accountable for the products and services we sell and helping our customers to solve any problems arising from such products or services.

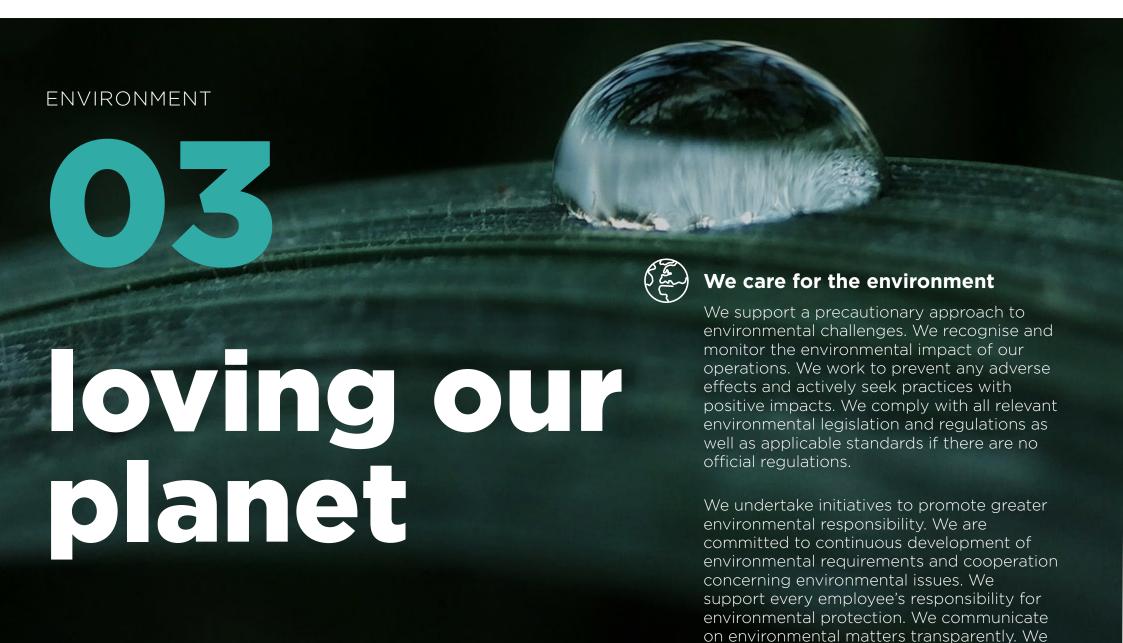
encourage the development and diffusion of

environmentally friendly technologies.

**FOREWORD** 

01 HUMAN RIGHTS 02 LABOUR

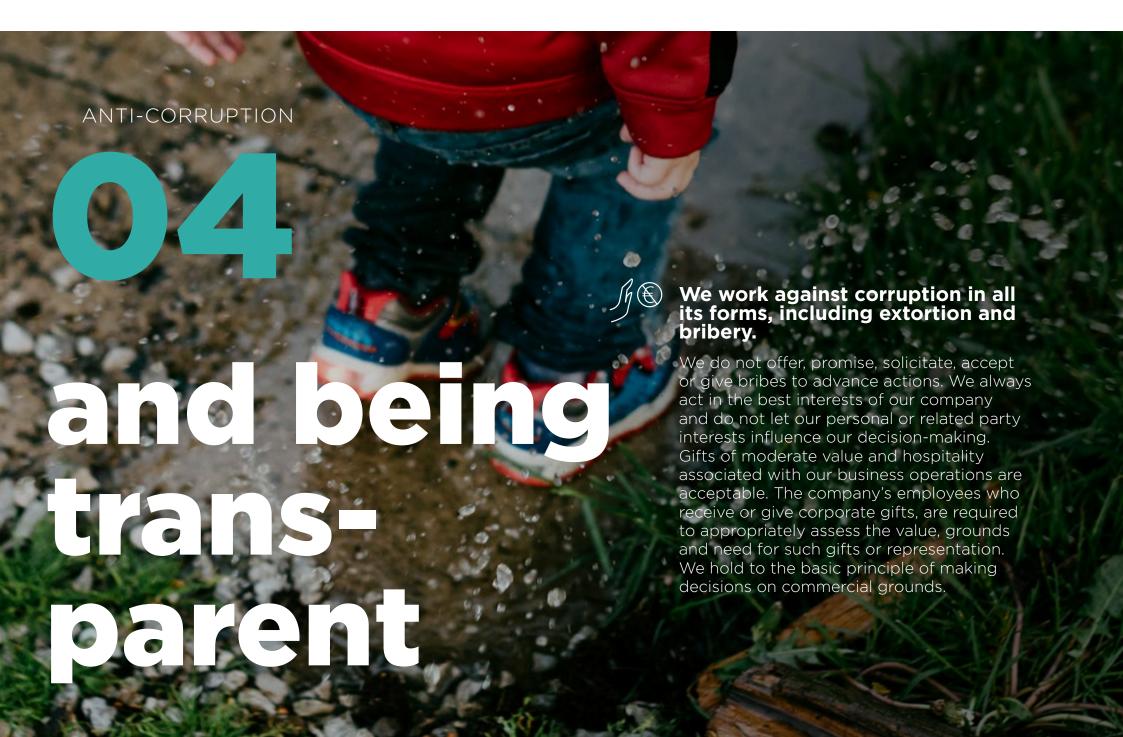




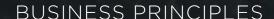


**FOREWORD** 









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# In all ou actions



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

01 HUMAN RIGHTS

1.

We comply with relevant laws and standards, and we expect the same measures from our partners.

2

We conduct trades in a compliant manner.

3.

We do not participate in political nor religious activity as a company.

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.

We will not, on our own or through any third party acting on our behalf, do business in, conduct any activity with, or provide any goods or services to or for the benefit of any country, individuals, group, entity that is sanctioned by the government of any country where we do business. We comply with all relevant and applicable export control laws and regulations, including but not limited to applicable trade, economic or financial sanctions which are imposed, administered or enforced by US, UN, EU, UK, any member state of the EU and/or EEA or any authority, official institution or agency acting on behalf of any of the above-mentioned.

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.



4.

We promote good corporate governance.

**5**.

We strive for business continuity and protect information we process.

6.

We commit to operating openly and transparently.

**7.** 

We react to non-compliances.

We avoid conflicts of interest between the company and any individual. Employees safeguard company assets and use them in the best possible way towards the attainment of company goals. We discourage employees from holding management positions in commercial corporations outside the company and shall prohibit any company employee from accepting such a position if that would create a conflict of interest with the employee's job duties in the company. We hold to the basic principle of employees complying with valid local legislation on competition restriction.

**FOREWORD** 

We recognize being part of critical infrastructure of Nordics and maintain our operations resiliency. Cybersecurity is essential for efficiency and security of our operations. We are committed to protect personal data of our customers, employees and partners.

We communicate our operations and discoveries transparently and openly. We choose to discuss the cases of noncompliance. We apply "open doors" principle, which means that we encourage our stakeholders to ask questions, make proposals as well as actively bring up non-compliances.

Our stakeholders shall react immediately if they observe any action contravening this Code of Conduct or current legislation. Immediate notifications of conserns enable taking corrective actions and remediating the impact of potential non-compliances as quickly as possible. All notifications of conserns should be made in good faith. Any conserns can be reported via St1 SpeakUp.

#### 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 Police

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