



ST1 PARTNER CODE 2023

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 is built on the United Nations 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. 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.

A handwritten signature in red ink, appearing to read "HT".

Henrikki Talvitie, CEO

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.

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 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

We at St1 Nordic Oy and other companies within the same corporate group (hereinafter referred to as "St1", "we", "us") 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 Partner Code 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. As a formal part of St1s commitment to the United Nations (UN) Global Compact, our policies, including Partner Code are developed in accordance with the [ten principles of the UN Global Compact](#). We are committed to conduct human rights due diligence in line with [UN Guiding Principles for Business \(UNGPs\)](#) and [Human Rights](#) and the [OECD Guidelines for Multinational Enterprises \(OECD MNEs\)](#).



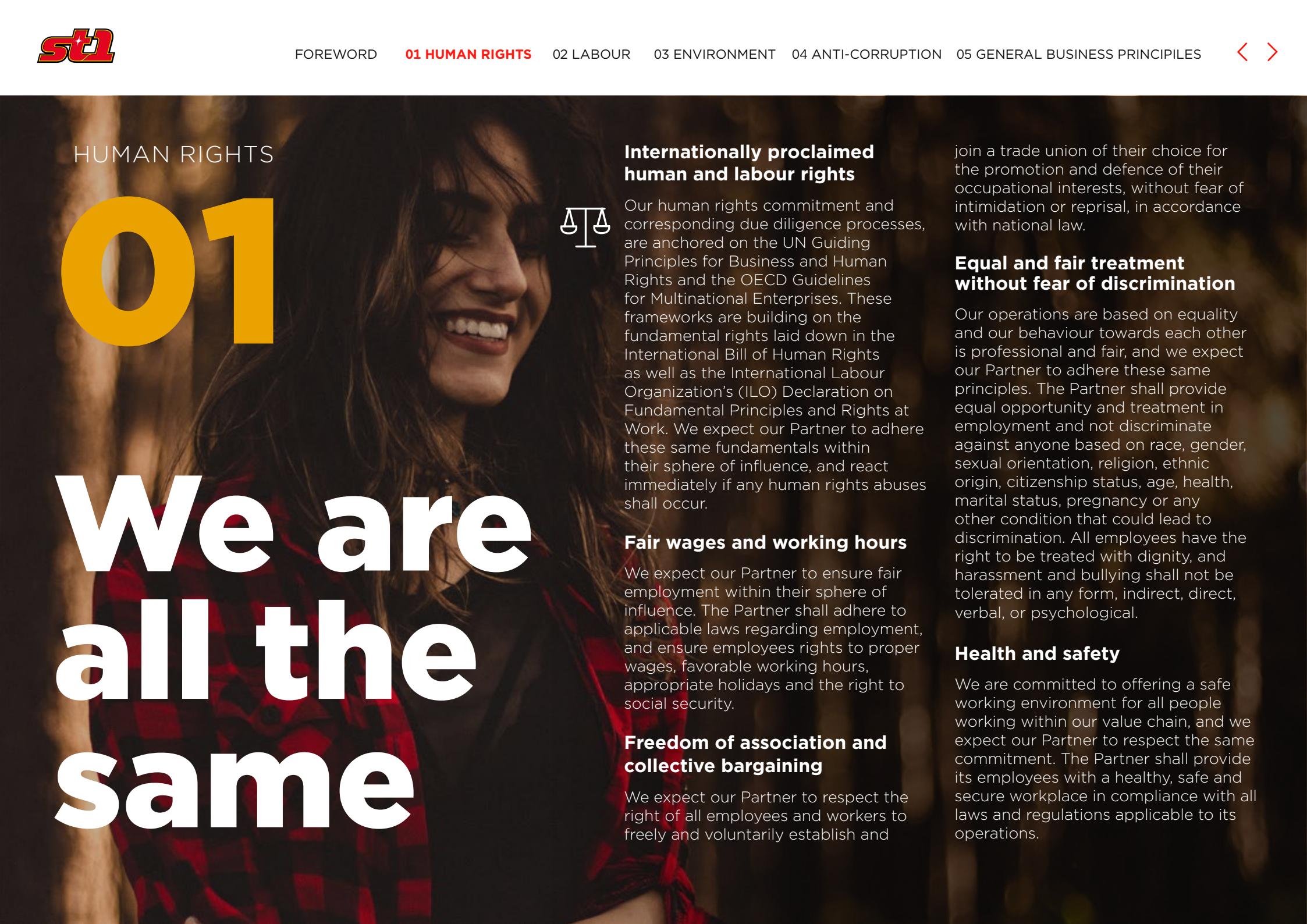
Further Guidance on how to interpret the Partner Code and act according to the principles set is provided within the Partner Guide.

This Partner Code shall apply, including but not limited to, to all of St1's potential or actual vendors, suppliers, contractors, subcontractors, representatives, contracting partners and any third parties with which St1 does or plans to do business (hereinafter referred to as "Partner" and collectively "Partners"). Further Guidance on how to interpret the Code and act according to the principles set is provided within the [Partner Guide](#).

This Partner Code forms an integral part of all agreements concluded between the Partner and St1. The Partner shall familiarize itself with the Partner Code comply with it and use its best efforts to ensure that no action or commission by the Partner or any of its employees, agents, customers, suppliers or subcontractors may cause the St1 to contravene the said Partner Code. St1 reserves the right to engage in activities to verify the aforementioned code which requires the participation of the Partner. The Partner must also implement the corrective actions deriving from the verification activities which St1 has undertaken. In case the Partner breaches the Partner Code and fails to remedy the breach as of St1's request, the St1 shall have the right to terminate the agreement with immediate effect.

HUMAN RIGHTS

01



We are all the same



Internationally proclaimed human and labour rights

Our human rights commitment and corresponding due diligence processes, are anchored on the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. These frameworks are building on 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.

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.

ENVIRONMENTAL SUSTAINABILITY

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 Partners.

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 party 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. The Partner shall refrain from all forms of corrupt and fraudulent practices as well as other criminal or unethical activities, such as providing or accepting any gift, corporate hospitality or other benefit in any situation that exceeds ordinary and conventional hospitality and in which it affects or may affect to the decision-making in relation to the other party.

GENERAL BUSINESS PRINCIPLES

05

In all our actions



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

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 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.

Trade compliance.

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. Our Partners shall comply with applicable economic and trade sanctions and monitor their partners.

The Partner must 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.

The Partner must notify St1 without undue delay if the Partner itself or any of its owners, directors, representatives, suppliers, vendors or any affiliate or person acting on behalf of the Partner is or becomes subject to any sanctions or if any product or technology which are provided by the Partner is or becomes subject to export control or license requirements.

3.

Data protection and intellectual property rights.

The Partner shall comply with all applicable laws and international treaties on intellectual property rights. The Partner shall not infringe St1's or any third party's IPRs. The Partner shall comply all applicable laws and regulations and principles and St1's instructions whenever the Partner processes personal or other data on behalf of St1.

4.

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.

5.

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.

6.

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.

7.

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. The Partner shall immediately report any concerns and potential non-compliances to this Partner Code to the main contact person at St1. Our Partners can also report any concerns via our SpeakUp channel. Immediate notifications of suspected non-compliances enable taking corrective actions and remediating the impact of potential non-compliances as quickly as possible.

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