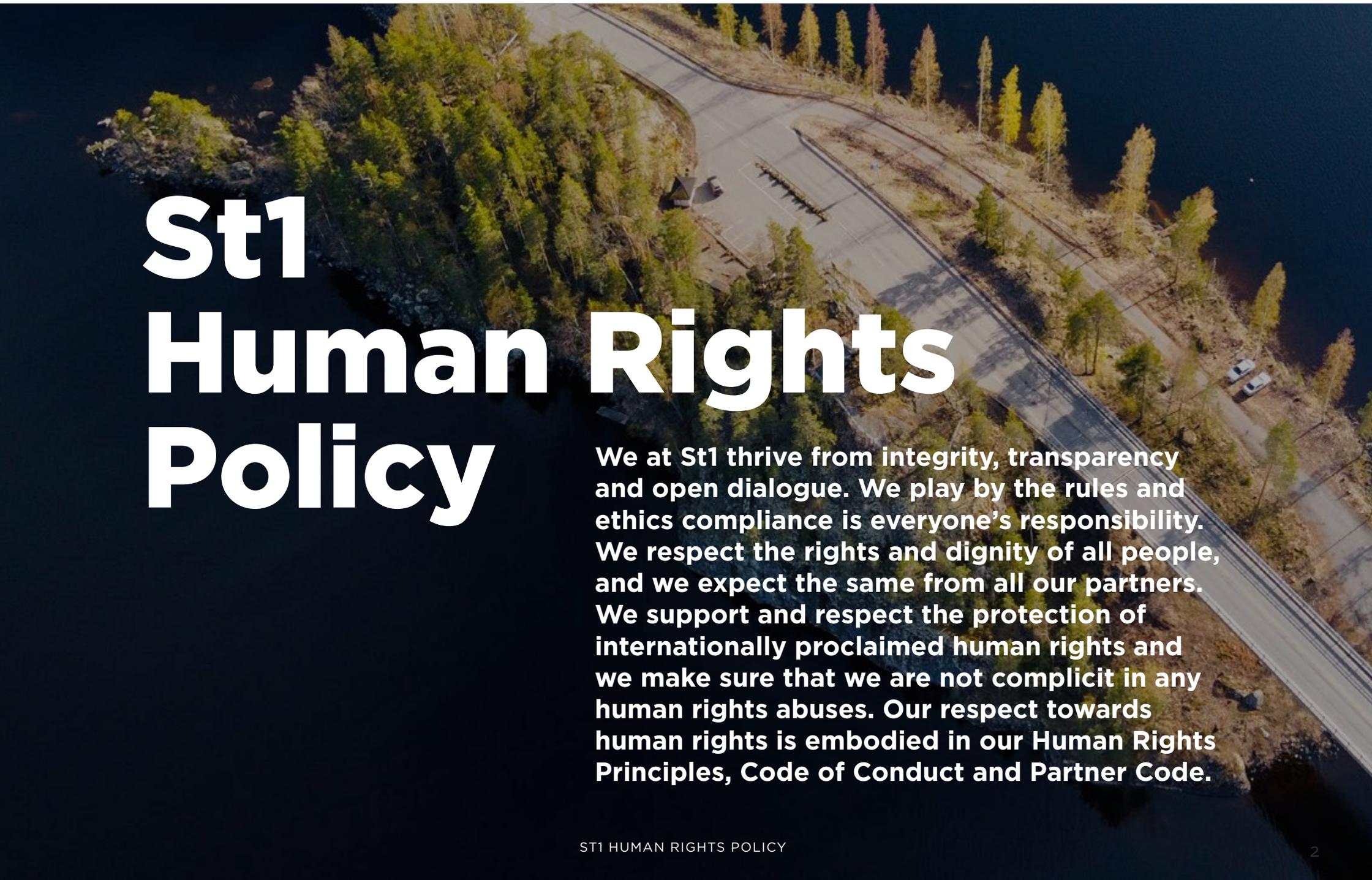




ST1 HUMAN RIGHTS POLICY 2023

**We are on a
journey together**



St1 Human Rights Policy

We at St1 thrive from integrity, transparency and open dialogue. We play by the rules and ethics compliance is everyone's responsibility. We respect the rights and dignity of all people, and we expect the same from all our partners. We support and respect the protection of internationally proclaimed human rights and we make sure that we are not complicit in any human rights abuses. Our respect towards human rights is embodied in our Human Rights Principles, Code of Conduct and Partner Code.

Policy Commitment

Our approach to human rights is based on the United Nations Guiding Principles for Business and Human Rights (UNGP) and the OECD Guidelines for Multinational Enterprises (OECD MNEs Guidelines). These two frameworks state the government's duty to protect human rights and the businesses' responsibility to respect them, and offer appropriate and effective remedies if breached. We respect the 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.

In line with the UNGP and OECD for MNEs Guidelines, St1 is implementing human rights into its due diligence process. When evaluating the possible and actual human rights impacts within our value chain, consultations with the relevant stakeholders ranging from St1's employees to our partners should take place. In the human rights impact assessment, emphasis is put

on the competence development of our employees and open dialogue with the stakeholders. We are committed to transparently reporting on how we address our impacts to legitimate human rights.

St1 ensures that all regulatory affairs with relevant actors, including governments, regulatory bodies and public authorities, are consistent with the human rights principles as stated in this document.

St1 is committed to improving its internal awareness in the field of human rights through training and communications. The aim is to provide human rights training to the management and all other St1 employees who may discover human rights violations within our value chain. Through familiarizing the employees with the possible risk areas, and situations in which violations are the most likely, the staff is better equipped to identify the risks and actual impacts.



We take steps to improve internal awareness and avoid human rights violations in our sphere of influence.

Human Rights Principles

We take steps to avoid human rights violations in our sphere of influence. We make sure that our operations do not contribute to human rights abuses, and encourage all our stakeholders, including employees, partners and communities, to react immediately if they observe any incidents as such. St1's Human Rights Principles foster awareness of human rights issues that are relevant to our work, further enhancing the capabilities to identify and manage the violations that may arise. The key human rights principles are outlined below.

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



We and our partners do 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.

Fair wages and working hours

To ensure fair employment, all employees involved in St1's own operations and value chain must be provided with fair wages, at least in line with the national minimum. St1 adheres to applicable laws regarding employment, and ensures employees rights to proper wages, favorable working hours, appropriate holidays and the right to social security as stated in the national legislation.

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.

Equal and fair treatment without fear of discrimination

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 and our partners do 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. We value each other's work and respect each other's individuality and psychological safety. All employees have the right to be treated with dignity, and harassment and bullying are not tolerated at the workplace or in any company context.



We respect privacy and are committed to safety in our value chain.

Health and safety

We are committed to offering a safe working environment for all people working within our value chain. We do not tolerate any form of substance abuse at St1, and we are committed to respecting our employees' and business partners' privacy and the confidentiality of personal data. We are also committed to contributing to developing the safety of our suppliers' employees by offering safety training and sharing knowledge. 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. We are accountable for the products and services we sell and helping our customers to solve any problems arising from such products or services.

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. All forms of bonded and indebted labour, such as withholding wages and depriving the freedom of a worker through physical confinement or forced overtime, are against the St1 Principles. 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.

To ensure that the above rights are respected, St1 prohibits illegible and illegal work contracts, and requires that all work documents must be written according to the applicable legal regulations. These contracts must be available to the employee, stating the terms and conditions of service, the voluntary nature of employment, the freedom to leave (including the appropriate procedures) and any penalties that may be associated with a departure or cessation of work. The workers must have the right to terminate their contract if so desired. All terms must be explained in a language and manner that are easily understandable for the employee/worker.

Child labour

St1 respects the distinct rights of children and requires these rights to be realized throughout our value chain. Child labour under the minimum age of 15, as defined by the International Labour Organization, is prohibited. 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 its own operations and the operation 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



St1 aims to assist the development of the communities and reduce the risk of adverse environmental, health and social impacts.



can in fact assist the development of the communities. For instance, St1's operations can provide new economic opportunities. St1 further aims to ensure all its employees and 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.

Anti-Corruption

St1 promotes ethical business behaviour and forbids offering, promising, solicitating, accepting and giving bribes to advance actions in its own operations or in supply chain. We actively aim in developing policies and concrete programmes to address corruption internally and within our value chain.

Right to privacy

St1 respects the right to privacy of everyone directly and indirectly involved in its operations, including the employees, business partners, and the customers. All personally identifiable information, personal healthcare information, and occupational information must be treated in a confidential manner. The company aims to ensure protection of information and integrity of systems through technological safeguards, monitoring, guidelines and regular training of employees and partners. Observations of possible breaches and serious deviations will be communicated to the management of the company and the necessary corrective actions will be taken. When new technology and/or new systems shall be acquired or new methods for processing personal data considered, appropriate safeguards and legal basis for processing will be taken into consideration in the evaluations. All employees shall be bound by confidentiality to disclose any unauthorized information received or processed during the employment.

 **We ensure protection of information and integrity with technological safeguards, monitoring, guidelines and regular training.**