



St1 Partner Code

2025



St1 Partner Code

St1's vision is to be the leading producer and seller of CO2 -aware energy. 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 expect to commit to the same principles and standards we have set for our business operations. As a formal part of St1's 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 the UN Guiding Principles on Business (UNGPs) and Human Rights and the OECD Guidelines for Multinational Enterprises (OECD MNEs Guidelines).

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 its requirements, and use its best efforts to ensure that the Partner nor its agents, customers, suppliers, or subcontractors take any action or omission that could cause St1 to violate the Partner Code.

This Partner Code shall apply, including but not limited to, all 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 with (hereinafter referred to as "Partner" and collectively "Partners"). The Partner Code is supplemented by St1's Code of Conduct and Human Rights Policy.

St1 reserves the right to verify compliance and audit the Partner and its relevant subcontractors. Such audits may include on-site inspections, document reviews, and interviews with personnel. Audits shall be conducted with reasonable prior notice and without undue disruption to operations. The Supplier shall provide full access to facilities, records, and personnel as reasonably required. The Partner commits to implement the respective corrective actions on possible identified non-conformances. 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.



General Business Principles

Compliance with laws and regulation

St1 expects its 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. Whether a requirement of this Partner Code would contradict national laws or regulation, the Partner is expected to comply with whichever is more stringent.

Trade compliance

St1 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, individual, group or 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.

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.

Participation in political or religious activity

St1 actively engages 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

St1 avoids 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.

Reacting to non-compliances

We at St1 communicate about our operations and discoveries transparently and openly, and we expect 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 Whistleblowing -channel available at <https://st1nordic.speakup.report/St1>. Immediate notifications of suspected non-compliances enable taking corrective actions and remediating the impact of potential non-compliances as quickly as possible.

Human and Labour Rights

Internationally proclaimed human and labour rights

St1's human rights commitment and corresponding due diligence processes, are anchored on the UN Guiding Principles for Business and Human Rights (UNGPs) 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 and overtime compensation, favourable working hours, appropriate holidays and the right to social security. Employees shall have reasonable rest periods between work shifts. Wage deductions and disciplinary measures are not allowed.



Freedom of association and collective bargaining

St1 respects the right of all St1 employees and workers to freely and voluntarily establish and join a trade union of their choice for the promotion and defense of their occupational interests. Employees and workers shall be able to exercise this right 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

St1 is committed to offering a safe working environment for all people working within our value chain. The Partner shall provide its employees with a healthy, safe and secure workplace in compliance with all laws and regulations applicable to its operations. This includes access to basic health services, essential medicines, safe drinking water, adequate sanitation, adequate nutrition, and decent housing wherever the operations may impact people and communities.

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 that deprives them of 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 or illegal work contracts are strictly prohibited. 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.



Child labour

St1 respects the distinct rights of children and requires these rights to be upheld 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 respect and uphold 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, to follow international standards. In addition, Partners are strongly encouraged to exercise influence on subcontractors, suppliers and other business affiliates to combat child labour in areas where potential child labour exists.

Indigenous peoples' rights

St1 expects its Partner to respect and uphold Indigenous peoples' rights throughout their operations. St1 recognizes the distinct rights and contributions of Indigenous peoples and are committed to inclusive, practices that uphold their dignity, traditions, and self-determination. Partner's operations shall be aligned with international standards, including the UN Declaration on the Rights of Indigenous peoples (UNDRIP) and the Indigenous and Tribal Peoples Convention (ILO 169).

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 shall recognise and monitor the environmental impact of its operations and is 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

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. The Partner shall avoid all forms of corruption, fraud, and any other criminal or unethical conduct, including offering or accepting gifts, corporate hospitality, or other benefits that go beyond customary and reasonable practices and that influence, or may influence, decision-making in relation to the other party.



Version control

Version	Approver	Approval date
1.0	St1 Management Team	2020
2.0	St1 Management Team	2023
3.0	St1 Board of Directors	16.12.2025