



# ST1 DUE DILIGENCE STATEMENT 2024

ST1 NORDIC OY

Our Statement on Modern Slavery and Human Trafficking in Compliance with the UK Modern Slavery Act and the Norwegian Transparency Act



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# St1 Nordic Oy Due Diligence Statement 2024

## 1. Introduction to our business

We at St1 thrive from integrity, transparency and open dialogue. We play by the rules, and ethics and compliance are everyone’s responsibility. We respect the rights and dignity of all people and expect the same from all our partners. We recognise and support the protection of internationally proclaimed human rights, and we are committed to identify, prevent, and mitigate actual or potential human rights impacts.

All employees involved in St1’s value chain have the right to be free from slavery, servitude, and forced labour, or any exploitation depriving them of their 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 work, are against the St1 principles.

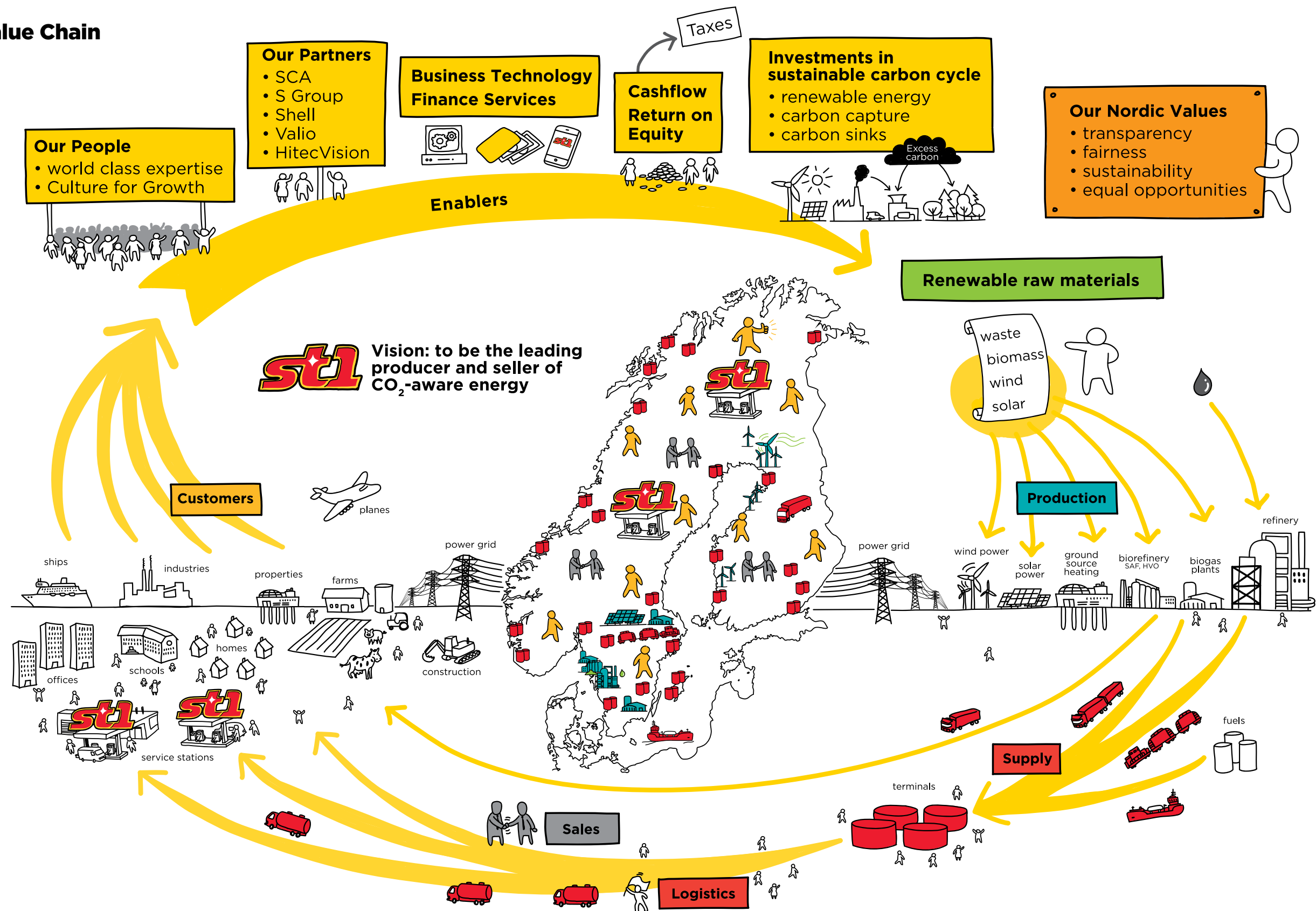
## 2. About this statement

This statement, prepared in accordance with the UK Modern Slavery Act 2015 and the Norwegian Transparency Act, is published by St1 Nordic Oy (St1) and applies to all our subsidiaries in compliance with the above-mentioned regulations. It has been approved by the Board of Directors of St1 Nordic Oy on June 17, 2025.

In this statement, we describe the steps St1 has taken during the financial year 2024 (January 1–December 31, 2024) to identify, assess, and address the risks of modern slavery and human trafficking, as well as risks of violations of other fundamental human rights and decent working conditions.

As of the period that this report accounts for, no human rights or labour rights violations have been identified.

St1 Value Chain



3. Structure, business, and supply chains

St1 is an energy transition company that operates in Finland, Sweden, Norway, and the United Kingdom. Through our operations, we implement our vision to be the leading producer and seller of CO<sub>2</sub>-aware energy, which we define as energy products that account for carbon impact throughout their lifecycle. CO<sub>2</sub>-aware means we are looking for the best possible ways to mitigate climate change and reduce carbon emissions. In the spirit of our vision, we research, develop, produce and invest in the energy transition to be able to provide our customers with CO<sub>2</sub>-aware energy while creating a positive societal impact.

As part of our operating model development, we have structured our business operations around value chains. Currently, there are four value chains: Oil Products, HVO, Biogas, and Electrification – the latter being a platform and a value chain in the development phase. HVO and Biogas are end-to-end value chains enabling commercial decision-making that accounts for every stage – from feedstock sourcing and production, to trading, logistics, and end-customer sales.

Our Group company Brocklesby Ltd in the United Kingdom recycles fatty food waste to produce renewable fuels. Our energy portfolio encompasses biogas, Sustainable Aviation Fuel (SAF), renewable diesel, solar power, and oil products. As part of our energy services St1 Lähienergia (St1 Local Energy) delivers ground source heating systems. Furthermore, we are advancing various major energy transition projects, including transition investments at the oil refinery in Gothenburg.

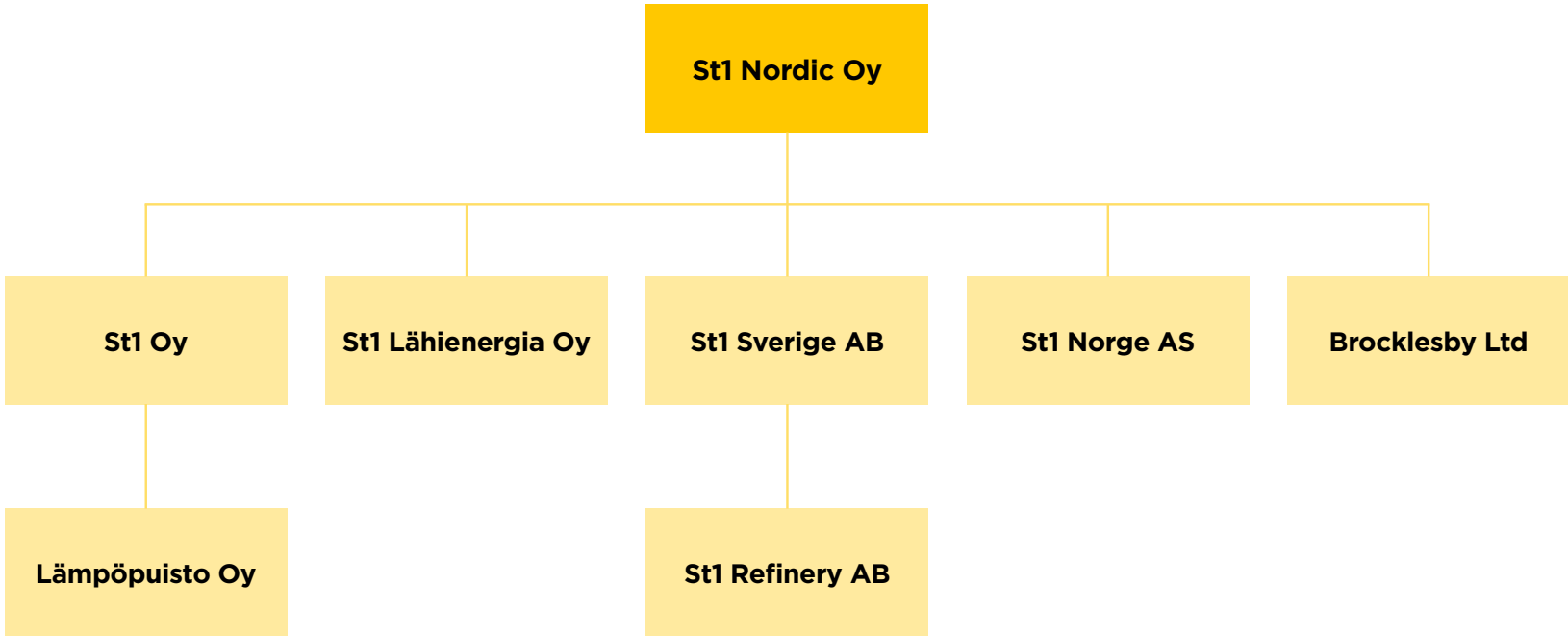
Our nationwide energy station networks span Finland, Sweden, and Norway, with a growing number of EV charging and biogas filling points for heavy-duty transport and car wash, alongside stand-alone convenience stores and restaurants. We have a comprehensive fuels logistics chain in all our countries consisting of extensive terminal and transport network, in partnership with North European Oil Trade (NEOT).

During 2024, St1 employed a total of 1,047 people and earned revenues amounting to 7,960.7 MEUR. Read more about St1’s structure, business, and supply chain in our integrated annual report, **Game Changer 2024**.

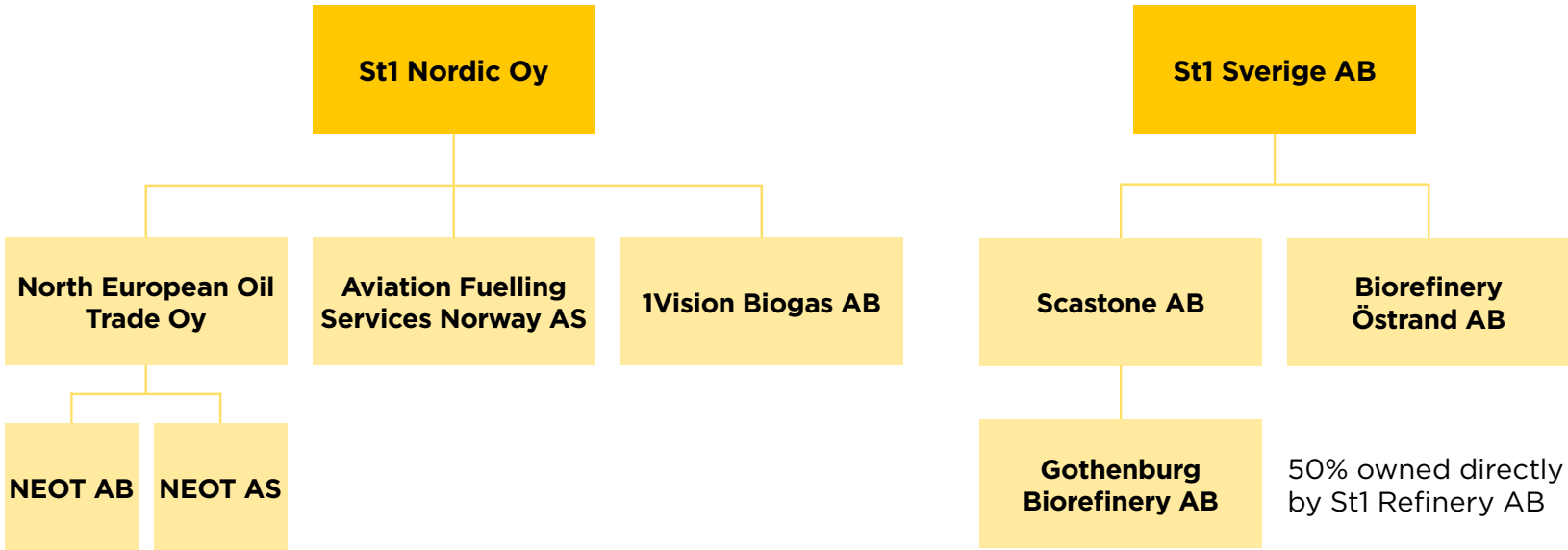
Our long-term partner, Equinor, supplied our crude oil deliveries in 2024 with crude sourced from the USA, Norway, Nigeria and the United Kingdom. Our associated company NEOT acquires fuels from global trading markets and handles storage and blending, as well as transportation from refineries to the terminals. Our station network utilises petroleum products produced at our own refinery, since the Gothenburg refinery is the most important source of supply, but NEOT also sources oil products from other refineries around the Baltic Sea area, mainly from Finland, Sweden, Norway and Denmark. <https://www.neot.fi/en/sustainability/>

Sourcing of renewable feedstocks originates from various sources, mainly from our own waste collection and treatment company Brocklesby Ltd in the United Kingdom, from our partnership with SCA as well as from the global feedstock markets. Brocklesby’s waste collection is based on strong partnerships with many restaurants, retailers, and food manufacturers in the United Kingdom.

Chart of the group’s main companies



Associated companies



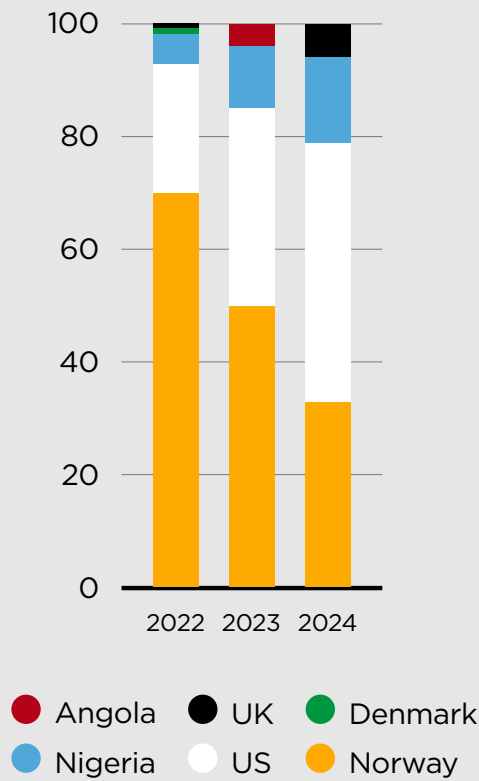
St1 and SCA's joint venture Gothenburg Biorefinery, produces Sustainable Aviation Fuels (SAF), renewable diesel (HVO), bionaphtha, and bioLPG. To support the production in Biorefinery Gothenburg, the HVO value chain includes highly competitive feedstock sourcing. Through a joint venture partnership with SCA, we have also secured a supply of crude tall oil (CTO) fractions such as fatty acids, a by-product from kraft pulp production in Sweden.

4. Our policies and principles

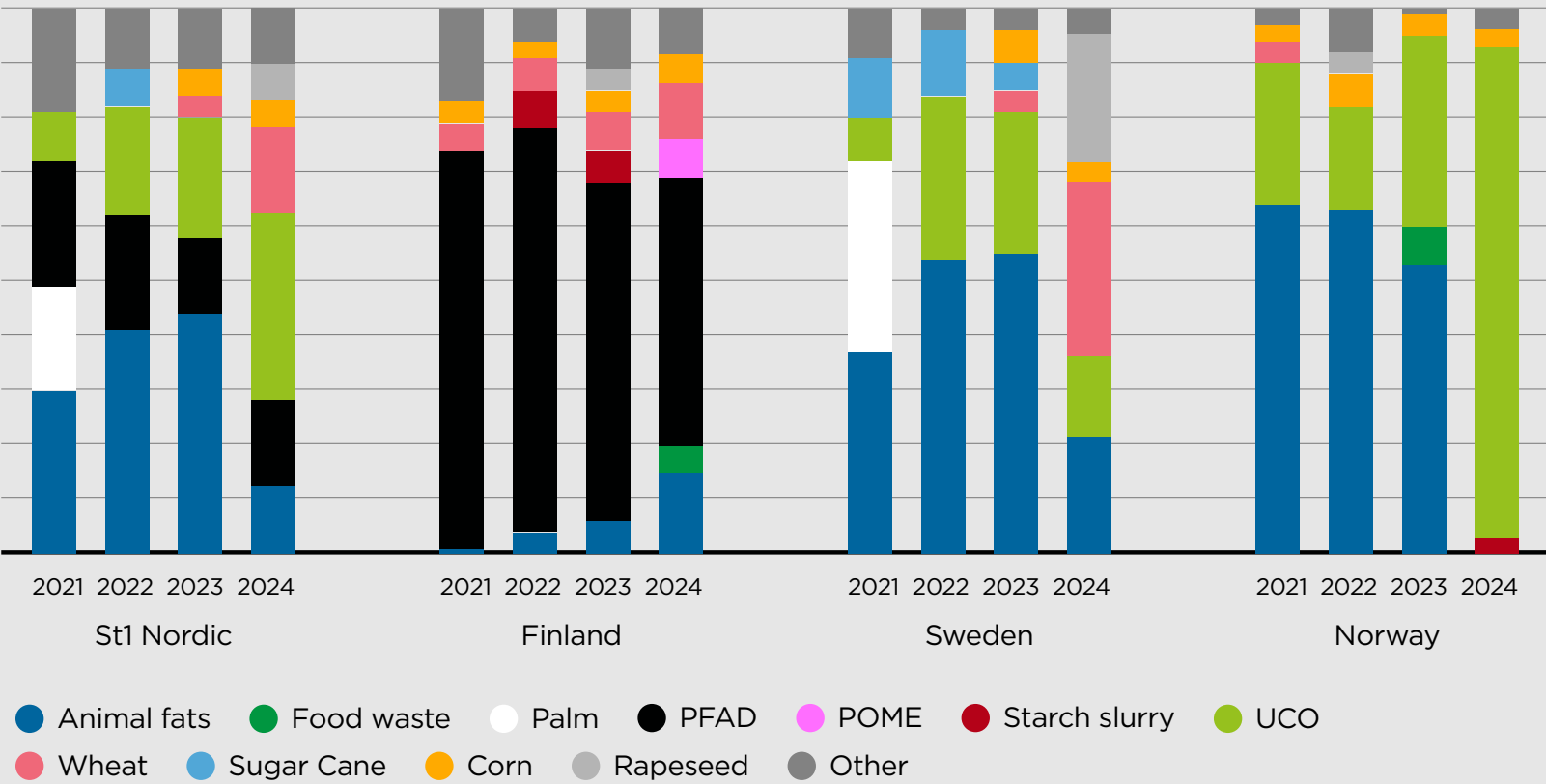
We seek to ensure that our operations have a positive impact on people and the societies they live in. However, we also acknowledge that our activities may directly or indirectly cause adverse impacts to human rights and decent working conditions. We recognise the potential risk of modern slavery in our industry and value chains and have zero tolerance towards modern slavery.

Our approach to human rights is based on the United Nations Guiding Principles on Business and Human Rights (UNGP). The UNGP outlines the duty of governments to protect human rights and businesses' responsibility to respect them as well as offer appropriate and effective remedy if those rights are breached.

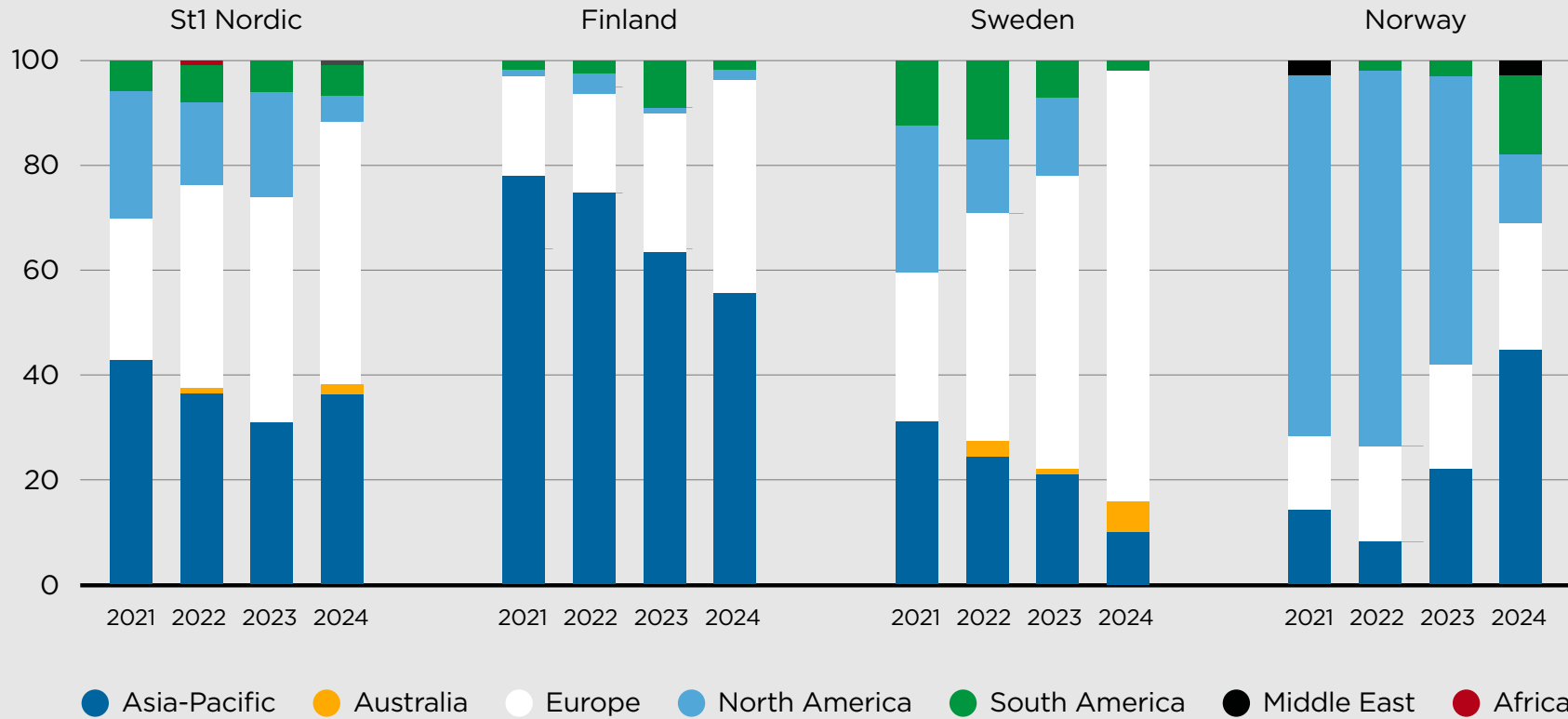
Crude oil processed at St1 Gothenburg refinery by country of origin, %



Biofuels feedstock split 2024 %



Biofuels feedstock country of origin by region, % volume



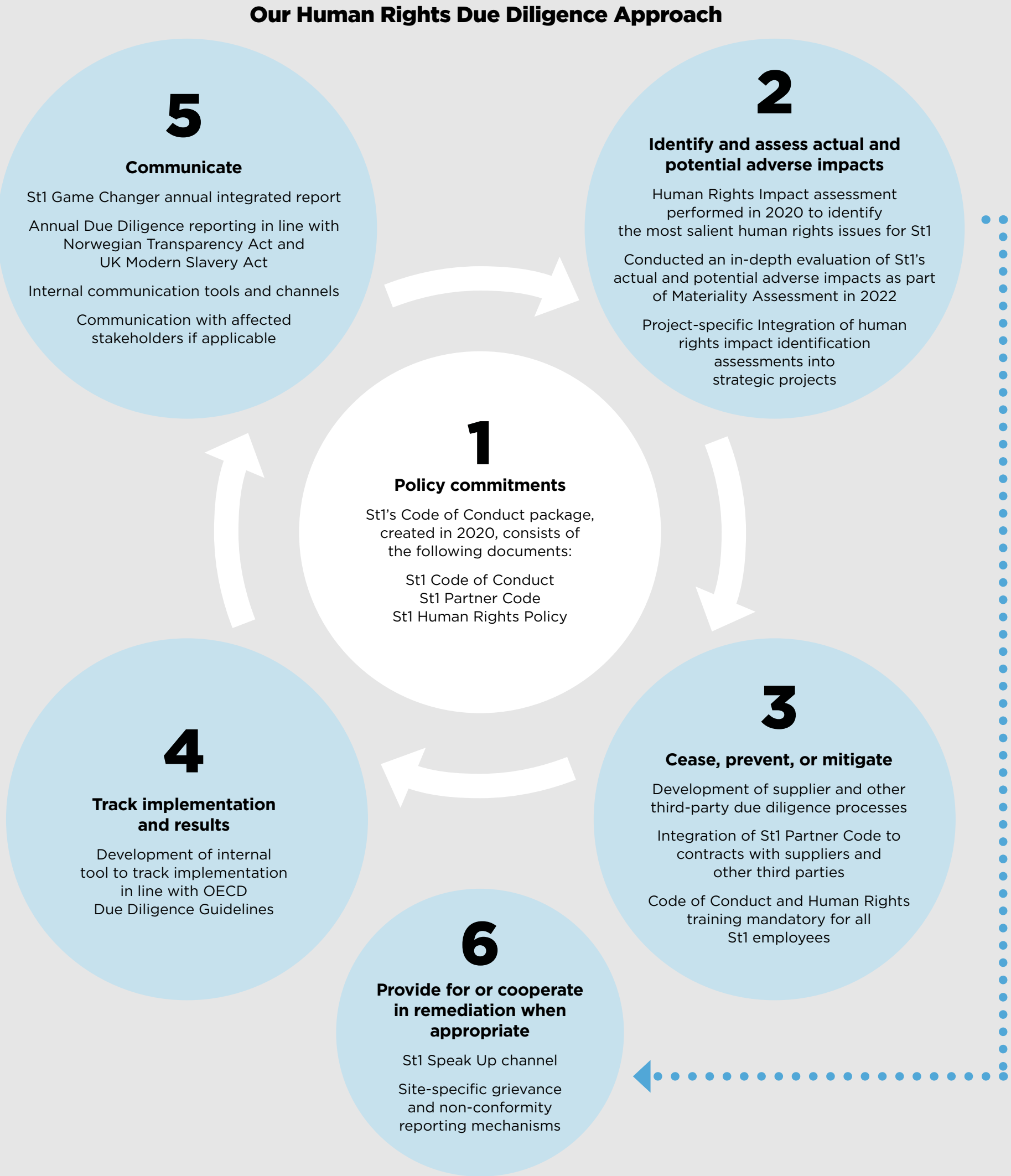
We respect the rights stated in the International Bill of Human Rights and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. Our respect towards human rights is embodied in our policies:

- St1 Human Rights Policy – outlines our commitment to respect fundamental human rights
- St1 Code of Conduct – sets the ground rules for St1 employees
- St1 Partner Code – sets the ground rules for our partners operating within our supply chain

Human rights principles that we address in our policies:

- Fair wages and working hours
- Freedom of association and collective bargaining
- Equal and fair treatment without fear of discrimination
- Health and safety
- Forced labour and modern slavery
- Child labour
- Positive societal impact to communities
- Anti-Corruption
- Right to privacy

At St1, we prioritise listening to our stakeholders and promoting transparent dialogue across our value chain. Any misconduct and unethical behaviour against our Code of Conduct is taken seriously, and we encourage all our stakeholders to report possible concerns openly.





We are in the process of further integrating the identified human rights issues into key policy documents and guidelines. These efforts aim to ensure that crucial measures to prevent negative impacts and maximise positive ones are applied consistently throughout our business operations. Through these actions, St1 seeks to ensure ethical business practices, protect workers rights, and reinforce accountability across our operations.

Our whistleblowing channel SpeakUp, introduced in 2020, allows stakeholders to report any incidents that they believe violate working conditions or involve unethical behaviour. Since the introduction of SpeakUp, we have placed greater emphasis on training our employees and will continue to promote the importance of due diligence and other salient issues. In 2024, a total of 6 SpeakUp cases were addressed. Out of these, three cases have been closed, while the remaining three are still open, pending further information from the reporter. All cases were thoroughly investigated and handled with the utmost discretion.

We take all reports of misconduct or unethical behaviour against our Code of Conduct seriously and urge all stakeholders to openly report any concerns they may have. Employees are encouraged to report observations of misconduct to their managers, Human Resources, management team members, or through SpeakUp, our anonymous communication channel available to all stakeholders.

We have also created a separate Norwegian Transparency Act email address, where the public can direct their questions. As required by law, all queries will be answered within a three-week timeframe. The email address can be found [here](#).

5. Risk assessment and management

As an energy company in transition, we know that our own operations and upstream supply chains are constantly developing. In the process of creating new business models, we ensure that we continually assess human rights risks. In 2022, we conducted our latest Group-wide sustainability impact assessment. Its purpose was to identify actual and potential adverse sustainability impacts in our own operations and throughout our value chain. The impacts were prioritised by scale, scope, irremediability and likelihood.

In addition, in 2024 we developed the draft double materiality analysis (DMA). The draft DMA identified key sustainability impacts across our entire value chain, including in our own operations, our supply chain (upstream), and through our customers’ actions (downstream), and was conducted to prepare for the Corporate Sustainability Reporting Directive (CSRD).

The most severe human rights impacts identified in the draft DMA were fundamental labour rights, health and safety, non-discrimination and equal opportunities, and land rights. Those particularly affected by these material impacts include workers in the upstream supply chain, retail site staff, contractors, and individuals involved in construction and maintenance projects, such as refinery turnarounds. The potential impacts identified in the draft DMA will be re-evaluated in 2025, with a detailed plan to mitigate, follow-up, remediate, and communicate on these risks.

The sector and geographical locations of the operations are key elements in defining risks. We use a wide range of sources to determine modern slavery risks and the risk of violations of other fundamental human and labour rights.

The sources include trustworthy reports by international human rights and non-governmental organisations, such as World Justice Project and Transparency International among others.

In 2024, we conducted onsite audits for potential battery energy storage systems (BESS) partners. BESS can be used to support renewable energy production and consumption projects such as electric vehicle charging. The audit scope included social and human rights topics. During 2025 we will develop a sustainability audit framework based on supplier and value chain risk.

6. Supplier and business partner due diligence

St1 has a diverse value chain. For this reason, we seek to ensure that our business partners are evaluated according to a risk-based approach. We recognise the critical role our suppliers and business partners play in our value chain and emphasise the need for stringent due diligence to address sustainability risks.

In 2024, we advanced our supplier due diligence process and practices by continuing the development and partial implementation of a new third-party due diligence system, focusing on the HVO value chain. This system includes supplier onboarding processes, sustainability risk management, audit documentation, and, in the future, the management of related corrective action plans. It will also support the application of St1’s new Sustainability Partner Due Diligence rule, which was developed in 2024 and will be finalised in 2025.

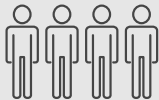
The most salient human rights issues



**Fundamental labour rights**  
Fair working hours and compensation, right to organise and bargain, right to join a union, right to freedom from slavery and forced labour, rights of children and youth



**Health and Safety**  
Health and safety of employees, sub-contractors, and all workers throughout our value chain

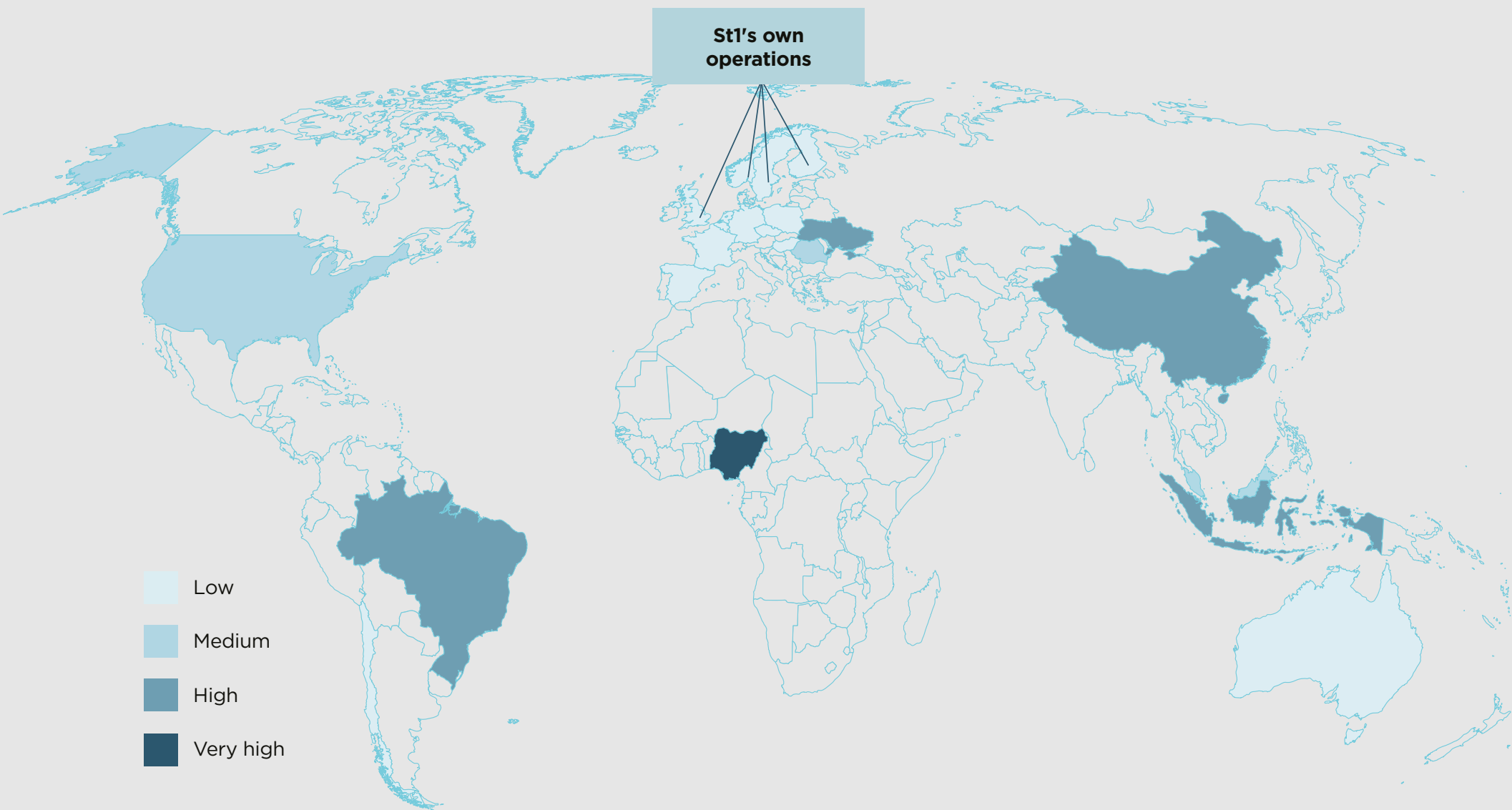


**Non-discrimination and equal opportunities**  
Right to equal treatment and non-discrimination, women’s rights, and right to privacy and family life



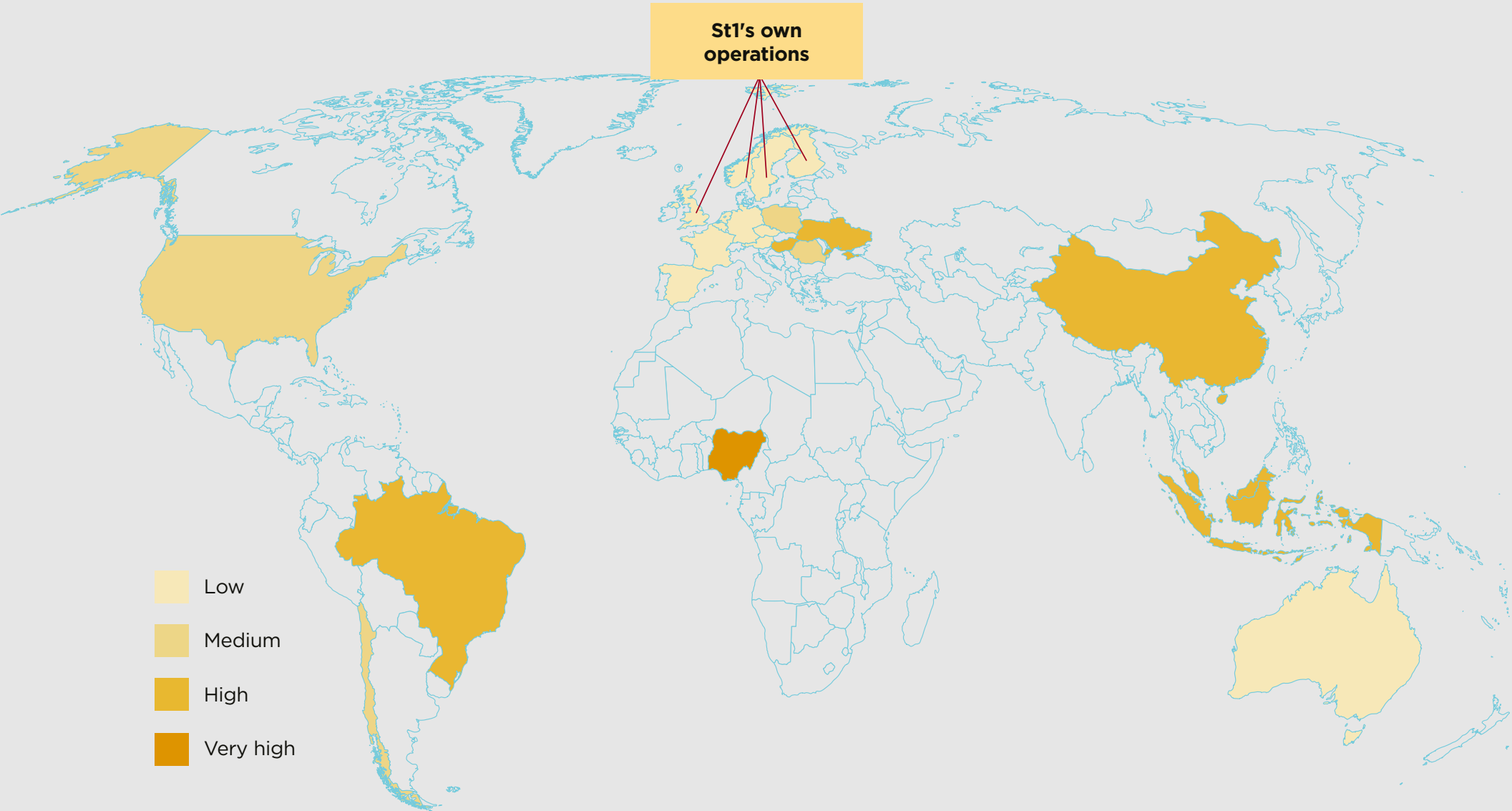
**Land and resource rights**  
Indigenous peoples’ rights, land, livelihoods, culture, and right to health and life

Modern slavery country risks



St1 assesses modern slavery risks by country using **The Global Slavery Index** produced by the Walk Free international human rights group. The assessment uses the Vulnerability Model, which determines the susceptibility of a country to modern slavery risks.

Human rights country risks



St1 assesses human rights risks by country using the **World Justice Project (WJP) Rule of Law index**, which evaluates countries risk levels based on eight factors. These include constraints on government powers, the absence of corruption, open government, fundamental rights, order and security, regulatory enforcement, and civil and criminal justice.

St1 has direct operations in Finland, Sweden, Norway, the United Kingdom. In addition, St1 Oy's subsidiary St1 Renewable Energy Thailand Ltd is being dissolved.

The remaining countries on the map represent the origin of crude oil used at St1 Refinery and the origin of feedstocks of biofuels products we sold in our home markets during the year 2024. The majority of biofuel products are sourced by our supply partner NEOT and all crude oil used in St1 Refinery is purchased from and shipped directly to our refinery by a single supplier. Only the countries from where we supply above 1% of the total biofuels volume as well as all countries from where we supply crude oil to our Refinery are included in the map. Products from Ukraine are not sourced from Russian-controlled areas.



**Our three-step partner sustainability due diligence process:**

1. Partner onboarding: Introduction to St1’s sustainability principles, completion of the St1 Partner Self-Assessment Questionnaire, sanction list screenings, and bio-product sustainability compliance checks.
2. Expert review and Risk Assessment: Analysis of self-assessment results, adverse media screenings, external sustainability ratings, and commitments, with potential requests for additional documentation or supplier dialogues to determine risk levels.
3. Decision, contract negotiation and follow-up: Actions and follow-up measures are tailored to the identified risk, with a structured decision-making process for high-risk partners. Partner Code is added in the contracts, and oversight mechanisms will be developed to monitor overall compliance of sustainability requirements within our partners.

In 2025, St1 will redesign the processes and workflows to enable enhanced automation, particularly for low-risk partners. The system will be expanded to cover various streams, including bio-based products, fossil products, strategic partners, and indirect sourcing partners. The new process will enable us to focus our resources to high-risk partners and through that practice sustainability due diligence activities with necessary detail. The overall due diligence process is owned by the legal function and includes, for example, a legal check including sanctions screening, cyber security screening, and solvency screening in addition to the sustainability

due diligence screening, which is owned by the sustainability function. We aim for all our third-party partners to go through the partner screening process. In 2025, we will set goals regarding the due diligence process in addition to finalising the process and implementing the related tool across the organisation. As part of this implementation, training will be provided, specifically for employees with purchasing responsibilities. Additionally, we will expand the system through collaborations with value chain partners, including joint ventures.

**7. Human rights in project development**

St1 is committed to ensuring that human rights due diligence is conducted for our investment projects, with stakeholder engagement serving as a crucial aspect of our project development. This engagement helps us identify potential human rights impacts at the initial stages of any project, allowing us to work together with stakeholders to avoid, minimise, mitigate, or compensate for these impacts. Our aim is to foster positive development in the societies in which we operate and contribute to a socially just energy transition. We actively engage in dialogue with stakeholders who may be impacted by our projects.

In 2024, as part of the operating model project work, we started to incorporate sustainability due diligence requirements into St1 projects. In 2025, we will continue to integrate human rights due diligence into our investment management process to ensure that human rights and other sustainability risks are identified and managed early on.

**8. Training**

St1 provides mandatory general human rights training for all employees as part of training on our Code of Conduct. The objective of the training is to maintain a high level of understanding on the risks of modern slavery and human trafficking as well as on the vital importance of fundamental human rights and decent working conditions to our operations and supply chain.

In 2024 we started developing a new training portal for employee trainings and in 2025 a new training portal will be implemented at a Nordic level. In the near future, we will update employee trainings on Code of Conduct, Human Rights as well as our Partner Code and ensure that the trainings are conducted regularly. In addition, we continuously train our own employees as well as contractors’ employees working at the sites in relevant health and safety topics. We also plan to strengthen value chain worker engagement and trainings within our upstream supply chain during 2025.

**9. Looking ahead**

As part of our efforts to continuously improve our due diligence processes and align them with best practices, we follow the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidelines and the United Nations Guiding Principles on Business and Human Rights.

In 2025, we will continue developing and implementing our partner due diligence process and tool including increased automatization. For example, we will develop a sustainability audit framework with prioritization based on supplier risk levels, incorporating follow-up activities and systematic monitoring of corrective action plan implementation. We will also continue to integrate human rights due diligence into our investment management process to ensure that human rights and other sustainability risks are identified and managed early on. Additionally, we will focus on refining and advancing St1’s overall sustainability ambition, roadmap and metrics.

The Board of Directors of St1 Nordic Oy approved this statement on June 17, 2025.



Henrikki Talvitie, CEO at St1 Nordic



# References

The following are the building blocks of St1's human rights due diligence approach:

## Frameworks:

- OECD Due Diligence Guidelines
- United Nations Guiding Principles on Business and Human Rights

## Country risk assessment indices and resources:

- Transparency International (Corruption Perception Index)
- International Trade Union Federation (ITUC Global Rights Index)
- WJP Rule of Law Index
- UNDP, Gender Inequality Index (GII)
- Environmental Performance Index (EPI)
- Freedom House (Freedom of the World Reports)
- Migrant Integration Policy Index
- UNICEF, statistics and reports
- Walk Free, Global Slavery Index
- International Work Group for Indigenous Affairs
- The Heritage, Property rights index
- Human Rights Watch World Report
- International Labour Organisation (ILO)
- Reporters Without Borders, Press Freedom
- U.S. Department of Labor, International Child Labour & Forced Labor Reports
- Indigenous Navigator
- Amnesty International





## **St1 Nordic Oy**

Interested in CO<sub>2</sub>-aware energy?

Read more at [st1.com](https://st1.com)

St1 Nordic Oy is an energy group  
whose vision is to be the leading producer  
and seller of CO<sub>2</sub>-aware energy