



St1 Human Rights Policy

2025



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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. In addition, we also strive to contribute to promoting and advancing human rights wherever possible. Our respect towards human rights is embodied in our Human Rights Principles, Code of Conduct and Partner Code.

Policy Commitment

St1's approach to human rights is based on the United Nations (UN) Guiding Principles for Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD MNEs Guidelines). These frameworks outline the government's duty to protect human rights and the businesses' responsibility to respect them, and sets the expectation to offer appropriate and effective remedies if breaches occur. St1 respects 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. St1 is a participant of the UN Global Compact and is committed to implementing its ten principles across our operations.

In line with the UNGP and OECD MNEs Guidelines, St1 incorporates human rights into due diligence processes. We take proactive steps to identify, prevent, and mitigate adverse human rights impacts in our own operations and across the value chain, and continuously monitor and evaluate the effectiveness of our due diligence processes. When evaluating potential and actual human rights impacts within the value chain, consultations with relevant stakeholders ranging from St1's employees to partners should take place. St1 conducts company-wide and site-specific human rights impact assessments, emphasizing competence development of St1 employees and maintaining open dialogue with stakeholders. St1 is committed to transparently reporting on how the company addresses impacts to 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. Our aim is to provide human rights training to management and all other St1 employees who may identify human rights violations within the value chain. By familiarizing employees with the possible risk areas, and situations in which violations are most likely, we enable them to better identify, mitigate and prevent risks and actual impacts.

This policy applies to all St1 operations, employees and subsidiaries, with the same expectations extended to partners across the value chain.



Human Rights Principles

St1 actively takes steps to avoid human rights violations within our sphere of influence. We make sure that our operations do not contribute to human rights abuses, and we encourage all stakeholders – including employees, partners and communities – to respond immediately if they observe any such incidents. St1's Human Rights Principles promote awareness of human rights issues that are relevant to our work, further enhancing the capabilities to identify and manage any potential violations. The key human rights principles are outlined below.

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 and overtime compensation, favourable working hours, appropriate holidays and the right to social security as stated in the national legislation. 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 defence of their occupational interests. Employees and workers should 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

St1's 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. St1 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.

Right to health

St1 is committed to respecting the right to health, including access to basic health services, essential medicines, safe drinking water, adequate sanitation, adequate nutrition, and decent housing wherever our operations may impact people and communities. St1 also expects business partners to uphold these principles and contribute to healthier, more resilient societies. St1 is committed and legally obligated to ensure the safety of our products. We comply with laws, regulations and standards related to product safety and continuously monitor



that the entire product quality chain meets the requirements set for it. St1 takes accountability for the products and services we sell and is dedicated to helping our customers to solve any problems arising from such products or services.

Occupational Health and Safety

St1 is committed to offering a safe working environment for all people working within our value chain. We proactively identify and mitigate health and safety risks, promote employee engagement in safety practices, and continuously improve our procedures in line with regulations and international standards. St1 is also committed to contributing to developing the safety of our subcontractors' employees by offering safety training and sharing knowledge.

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. 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 Human Rights Principles.

It is prohibited for St1's 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 these rights are respected, St1 prohibits illegible or 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 is easily understandable for the employee/worker.

Child labour

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

Positive societal impact to communities

St1 acknowledges that its own operations and the operations in the 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 also to contribute positively to community development. 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 access to supporting services to the workers, which may foster social progress also in the wider community. In ensuring these rights are upheld, special attention is given to vulnerable groups and affected minorities.

All human rights impact assessments conducted by St1 include assessing whether any minorities or vulnerable groups may be affected. If such communities are identified, they should be actively involved in the impact assessment, and the realization of their human rights should be monitored with particular attention.

Indigenous Peoples' rights

St1 recognizes the distinct rights and contributions of Indigenous Peoples and are committed to inclusive practices that uphold their dignity, traditions, and self-determination. St1 supports an equitable energy transition that benefits Indigenous communities and protects the natural landscapes we share. St1's operations align with international standards, including the UN Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Indigenous and Tribal Peoples Convention (ILO 169).

St1 recognizes that Indigenous Peoples are often at heightened risk of human rights violations, and that their livelihoods, food security, and cultural practices are closely tied to the protection of their rights to access, use, and own land. We have zero-tolerance for land-grabbing, and conduct environmental and social impact assessments before initiating projects that may affect Indigenous Peoples' rights, ensuring meaningful engagement throughout the project. St1 respects and upholds the principle of Free, Prior, and Informed Consent (FPIC), facilitating transparent and culturally appropriate decision-making. St1 also expects its partners to respect and uphold Indigenous rights throughout their operations.

Anti-Corruption

St1 promotes ethical business behaviour and forbids offering, promising, soliciting, accepting and giving bribes to advance actions in its own operations or in the value chain. St1 actively develops policies and concrete programmes to address corruption internally and within the value chain.



Right to privacy

St1 respects the right to privacy of everyone directly and indirectly involved in its operations, including employees, business partners, and customers. All personally identifiable information, personal healthcare information, and occupational information must be treated in a confidential manner. St1 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.

Reporting Grievances and Remediation

St1 takes all suspected violations of human rights seriously and encourages employees, workers in the value chain, local communities, and other external stakeholders to report any potential violations of this policy and its principles to St1, without fear of retaliation.

St1 has a whistleblowing channel (SpeakUp) in place for anonymous reporting of violations of the Code of Conduct, Human Rights Policy, and ethical guidelines, including human rights violations. This channel is accessible to all employees and external stakeholders, including workers within the value chain. Any reported incidents shall be investigated confidentially in accordance with St1's investigation process. In addition, employees are encouraged to report observations of violations to their managers, Human Resources, and management team members. Retaliation against any reporters of potential violations is strictly prohibited. The channel can be accessed here: <https://st1nordic.speakup.report/St1>.

St1 is committed to providing, or cooperating to provide, appropriate and effective remedy to individuals or communities that have been affected by adverse human rights impacts that St1 has caused or contributed to. Remedy shall be aligned with international human rights standards and defined together with the affected parties through meaningful dialogue.

Governance

Respecting and upholding human rights is everyone's responsibility within St1's operations and its subsidiaries. This policy is approved by the St1 Board of Directors, which holds ultimate responsibility and oversight for human rights across the organisation. Implementation of this policy and the St1 Human Rights principles are led by the Sustainability Governance & Performance team, and is steered by the Head of Sustainability and Corporate Affairs, an executive leadership member reporting directly to the St1 CEO. The Sustainability Governance & Performance team is responsible for monitoring the effectiveness of this policy, and ensuring it remains up to date through regular review.



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