

# Business Partner Code of Conduct

St1 Biokraft AB ("St1 Biokraft") is a biogas growth company operating in the Nordics. The company's activities cover the whole biogas value chain, from feedstock sourcing to distribution and end user sales. This Partner Code of Conduct (the "Code of Conduct" or the "Code") refers to all operations within St1 business Biokraft and in all jurisdictions where St1 Biokraft operates.

## Introduction

St1 Biokraft is committed to ensure that our products and services are produced under sustainable and responsible conditions. To achieve this, St Biokraft emphasises the importance of adhering to our core values and working with business partners who follow equivalent commitments and standards.

Business partners such as suppliers, agents, joint venture partners, contractors and any other counterparty that conducts business with St1 Biokraft ("**Business Partners**") must agree to comply with the commitments and standards in accordance with this Code of Conduct. In addition, a Business Partner may also be a major customer if considered significant in terms of contract value, turnover and volumes generated from such customer. The Business Partner shall respect the Code of Conduct and is responsible for ensuring that both its own organization and contracted subcontractors comply with the requirements.

Products and services must be compatible with the **UN Global Compact's 10 principles** of human rights, working conditions, environment, openness, and corruption. The principles are based on the Universal Declaration of Human Rights, the International Labour Organization's ("**ILO**") Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption.

## Business Ethics

The Business Partner shall conduct its business according to good business practice and keep high ethical standards, which includes complying with the areas specified below.

### Laws and Regulations

The Business Partner shall follow applicable laws, regulations, statutory requirements and standards as well as collective agreements applicable to its operations and at its own expense hold all necessary permits, approvals, licenses and registrations.

### Anti-Corruption

The Business Partner must comply with applicable national and international anti-corruption regulations and may not engage in, tolerate or facilitate any form of corruption, fraudulent practices or other criminal or unethical activities, including bribery, facilitation payments, conflict of interest and extortion. Representation and gifts shall be characterized by openness, moderation and always have a natural connection to the business relation.

## **Conflict of interest**

We expect our Business Partner to disclose any potential or existing conflicts of interest, whether it shall be directly or indirectly related to St1 Biokraft or its employees.

## **Fair competition**

The Business Partner may not engage in, tolerate or facilitate any conduct or agreement that may violate applicable national and international competition and anti-trust laws. This includes, but is not limited to, not to enter into discussions or agreements on pricing, market sharing or other similar activities with competitors.

## **Trade Compliance**

The Business 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 Business Partner must notify St1 Biokraft without undue delay if the Business Partner itself or any of its owners, directors, representatives, suppliers, vendors or any affiliate or person acting on behalf of the Business 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.

## **Participation in political or religious activity**

Business Partners must not utilize their position or our partnership in promoting political endeavours contradicting the laws and regulations, or the principles set within this Code of Conduct.

# **Human Rights and Labour Rights**

## **Human Rights and Respect for People's Equal Worth**

The Business Partner shall support, and respect internationally declared human rights and treat its employees fairly, equally and with respect for people's equal worth.

Products and services must be compatible with the **UN Global Compact's 10 principles** of human rights, working conditions, environment, openness, and corruption. The principles are based on the Universal Declaration of Human Rights, the International Labour Organization's ("**ILO**") Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption.

## **Discrimination and Harassments**

The Business Partner is not allowed to practice any kind of discrimination based on gender, ethnicity, religion, disability, sexual orientation, union membership, age or any other condition that could lead to discrimination. The Business Partner shall make sure that harassments, bullying, threats, oppression, or other offensive special treatment does not occur.

## **Freedom of Association and Right to Collective Bargaining**

We expect our Business 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.

## **Working Conditions**

All employees shall have written employment contracts translated to the language that they understand. All employees shall have right to statutory leave.

## **Labour Rights**

The Business Partner must not use forced labour or engage in deceptive recruiting and human trafficking. The Business Partner shall at least meet laws and regulations concerning salaries and working hours, including those concerning minimum salaries, overtime pay, and other types of remunerations, and provide legally required benefits according to ILO conventions on the abolition of forced labour. The Business 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 Business Partners to charge recruitment fees from their employees, require employees to deposit money, 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 Business 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 Biokraft does not accept child labour. The Business Partner shall work towards the abolition of child labour according to the UN child convention and ILO convention on minimum age for access to work. The Business Partner is prohibited to employ workers under the minimum age of 15, as defined by the International Labour Organization. The working conditions for employees under the age of 18 must be appropriate for their age and must at least be compatible with national law. The minimum age for hazardous work is 18 years.

## **Health and Safety**

The Business Partner is responsible to plan and shape its operations so that the working environment is safe, including with regards to appropriate equipment, sound levels, building and fire safety, first aid, etc. The Business Partner shall work systematically and precautionary to continuously improve the working environment. Accidents and work-related injuries shall be prevented, and incidents shall always be reported and investigated. Employees must have the right to refuse a work situation if they reasonably consider that the situation may entail a serious risk to their health and safety.

All employees shall regularly be trained in a safe working environment, and relevant information shall be available in a language that all operational staff can understand.

Every contractor that works at St1 Biokraft's facilities shall take part of and adhere to St1 Biokraft's safety rules and protocols.

## **Environment**

St1 Biokraft expects that the Business Partner to the greatest extent possible uses renewable energy for transportation and production and otherwise work actively with reducing emission to air, ground, and water, as well as streamlining its use of energy and resources. 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.

The Business Partner shall apply the precautionary principle. This means that the business is carried out in a responsible manner with regards to environment risks, and environmental impact by applying precautionary methods that ensures that environmental damages does not occur.

The Business Partner shall have a system to take care of waste in a correct way to promote recycling and reusing.

## **Information Management**

Confidential information relating to St1 Biokraft's business is only allowed to be used for the specific purpose that it is intended for. The Business Partner must treat all non-public information obtained in the relationship with St1 Biokraft International as confidential.

## **Data protection and intellectual property rights**

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

# Compliance and Monitoring

The Business Partner shall ensure own compliance with the Code and throughout its value chain. The Business Partner undertakes to, upon request, participate in audits and provide all necessary information on management systems, environmental performance and any other relevant information for the purpose of verifying compliance with this Code.

Any non-compliance must be reported to St1 Biokraft. Reports can be made directly to the relevant contact person at St1 Biokraft.

Non-compliance with this Code may have negative impacts on St1 Biokraft and jeopardize the business relationship with St1 Biokraft. St1 Biokraft reserves the right to terminate the contract with any Business Partner who itself or in any part of its value chain has materially breached this Code.

\*\*\*

*This Business Partner Code of Conduct was last approved on 28.11.2024 by the board of St1Biokraft AB.*

*St1 Biokraft AB, Board of Directors*