

Business Partner Code of Conduct

At St1 Biokraft, we are dedicated to developing biogas landscape in the Nordics and Europe, managing the entire biogas value chain from sourcing feedstock to sales and distribution. We believe that our impact extends beyond our own operations. Our business partners such as our suppliers, agents, joint venture partners, contractors and any other counterparty that conducts business with St1 Biokraft or acts on our behalf ("Partners") are key to delivering this mission.

Guided By Safety and Cornerstones

Introduction and Purpose

This Business Partner Code of Conduct ("Code") reflects our shared commitment to operating safely, lawfully, ethically and in alignment with our company principles and our culture Cornerstones. Our culture is designed to bring us together as One Team, with One Dream, working towards One Result: to create a better future for generations to come. We believe that all our Partners are an integral part of our One Team and must adhere to our Code herein.

Our Commitments

We act with integrity, professionalism and respect for people and the planet. We commit and expect our Partners to commit to:

- A safe and healthy work environment
- Respecting human rights and labour protections
- Equal opportunity, inclusion, and diversity
- Environmental responsibility and climate impact reduction
- Complying with all applicable laws, regulations and St1 Biokraft applicable policies

Our Culture Cornerstones

Our guiding principles, ethics and culture are anchored in Safety First and our four culture Cornerstones:

- **Be Collaborative** – we are winning together.
- **Be the Expert** – we act with competence and curiosity.
- **Be Commercial** – we drive green transition with entrepreneurial spirit and financial perspective.
- **Be Open** – we believe in transparency, learning mindset, honest and constructive communication, we speak up, listen, and share responsibly.

Our Cornerstones shape how we act in every partnership every day and what we expect from our Partners.

Safe, Fair and Inclusive

We are committed to building a safe, fair, and responsible value chain and workplace for all. Our expectations, human rights commitment and corresponding due diligence processes are anchored in international frameworks such as:

- the UN Guiding Principles on Business and Human Rights (UNGPs),
- the OECD Guidelines for Multinational Enterprises,
- the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work,
- the EU Corporate Sustainability Due Diligence Directive, and
- obligations following from applicable national laws.

This means that we expect from our Partners to ensure their practices uphold these principles and create conditions that promote human dignity, equality and safety for all employees.

Human Rights and Fair Treatment

Respecting human dignity and promoting fairness is fundamental to who we are. We commit to upholding internationally recognized human rights standards in all areas of operation.

All Partners must respect and uphold internationally recognized human rights. This includes avoiding actions that cause or contribute to adverse human rights impacts, and working to identify, prevent and mitigate such risks across their operations and supply chains.

Partners must have in place policies and operational procedures to support human rights due diligence. Partners must take active measures to prevent, mitigate and remediate any adverse human rights impacts, whether caused by their own activities or linked to their operations through business relationships.

Respect, Inclusion and Equal Opportunity

At St1 Biokraft, our safety ethics start with respect for each other, for our differences, and for the right to feel safe, valued and heard. We believe that dignity, fairness and inclusion are non-negotiable foundations for a safe and successful workplace.

Non-Discrimination

The Partner must not engage in or tolerate any discrimination based on ethnicity, gender, age, language, religion, disability, sexual orientation, political opinion, union membership, pregnancy or any other status protected by applicable law.

Harassment-Free Workplace

All forms of harassment, bullying, intimidation or degrading treatment – verbal, physical, visual or psychological – are strictly prohibited. The Partner shall take adequate measures to prevent and address such behaviors in the workplace.

Equal Treatment

The Partner shall actively promote diversity and inclusion at recruitment and all levels of the workforce and ensure equal access to development opportunities, promotions, training and fair treatment in all employment-related decisions.

Labour Rights and Freedom of Association

Freedom of Association and Collective Bargaining

We respect the right of all people at work 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. This means we expect the same from our Partners.

No Forced or Bonded Labour

Employment must be freely chosen. The Partner shall not engage in or benefit from forced, bonded or indentured labour. Employees and workers must not be required to surrender identification documents, pay recruitment fees, or be subjected to physical or psychological coercion.

No Child Labour

The Partner shall not employ workers under the age of 15, or under the minimum age for employment as defined by local law, whichever is higher. No worker under the age of 18 shall perform hazardous work or night shifts.

Employment Terms and Contracts

The Partner shall ensure that their employees receive clear, written contracts in a language they understand, outlining their rights, responsibilities, wages, hours and benefits. Oral contracts or informal arrangements are not permitted.

No Retention of Identity Documents

The Partner must never withhold passports or identity documents from workers. Employees and workers shall retain possession and control of their personal documents at all times.

No Recruitment Fees

The Partner shall ensure that employees are not charged recruitment or placement fees. Where such fees are identified, the Partner is responsible for full reimbursement.

Wages and Compensation

The Partner shall ensure that its employees are paid at least the legal minimum wage or the prevailing industry standard, whichever is higher. Overtime must be compensated at legally mandated rates. Deductions must not be used as disciplinary measures.

Working Hours

The Partner must comply with all applicable laws regarding working hours, rest periods and overtime. Employees must receive at least one day off every seven days, and daily rest must be ensured.

Right to Terminate Employment

The Partner shall ensure that employees are free to leave employment after reasonable notice. Contracts must not impose excessive penalties for resignation.

Workplace Safety and Wellbeing

Safety is our first and most important priority. We are committed to providing a safe and healthy working environment for everyone who works at or with the company, and this is what we expect from our Partners.

All contractors and subcontractors operating at St1 Biokraft sites must comply with our Work Environment Policy and other health and safety regulations.

Safe and Healthy Working Environment

The Partner shall provide a working environment that complies with all applicable occupational health and safety laws and regulations, including fire safety, machinery maintenance, protective equipment and emergency procedures.

Safety Training

The Partner shall ensure that employees receive regular and role-specific training on workplace hazards, safety procedures and use of equipment. Training must be provided in a language the employee understands.

Incident Management

The Partner shall ensure that all work-related injuries and near-misses are reported, recorded and investigated. Corrective actions must be implemented promptly.

Right to Refuse Unsafe Work

The Partner shall ensure that employees keep the right to refuse tasks that they reasonably believe could pose a serious threat to their health or safety without fear of retaliation.

Mental Health and Wellbeing

The Partner shall foster a supportive work environment that considers mental health and psychosocial risks. Measures such as reasonable workload, anti-bullying programs, and access to assistance programs are strongly encouraged.

Protecting What Powers Us

At St1 Biokraft, the data we gather, the knowledge and ideas we build as a company, and the tools we use are the core assets that fuel innovation, guide strategy, and power our contribution to the green transition. We expect our Partners to respect and safeguard our assets worth protecting.

Intellectual Property

We safeguard and respect intellectual property (IP) as a core asset of our company and a driver of innovation and competitiveness. Our Partners are expected to uphold the same level of protection.

Partners must not use, copy, reproduce or share our confidential know-how, production methods, patented procedures or proprietary IP subjects without prior authorization.

Any access granted to intellectual property must be for the agreed purpose only.

The use of third-party IP in deliveries to us must comply with all applicable license terms and must not infringe any rights.

Use of Resources and Information

St1 Biokraft's physical, digital, financial and intellectual resources are to be used responsibly and only for authorized purposes.

We expect our Partners to handle our information, systems and equipment with care, professionalism and integrity.

Data Protection and Confidentiality

Our employees, partners and customers expect us to protect the information they share with us. We take care to have appropriate safeguards in place to ensure that all personal and business data is handled responsibly, kept confidential, and protected against misuse.

All Partners must process personal data in accordance with the EU General Data Protection Regulation (GDPR) and any other applicable data privacy laws.

Personal data and confidential information received from St1 Biokraft must be protected and used lawfully, transparently and for specified legitimate purpose. Measures must be taken to safeguard data and ensure the rights of individuals are protected, including in cross-border processing and when subcontractors are involved.

This obligation remains in force even after the termination of the relationship with St1 Biokraft.

Data Security

We rely on digital tools and systems to do our best work, and with that comes the responsibility to protect St1 Biokraft's information and technology. Data security is a shared responsibility and a key part of working safely and responsibly.

Partners must implement adequate technical and organizational measures to protect personal data and sensitive company information from unauthorized access, alteration, loss or destruction.

Any data breaches affecting St1 Biokraft data must be promptly reported, with details of mitigation actions taken.

IT and Communication Systems

St1 Biokraft systems, including email, internet access, software, networks and devices, are provided to support our business.

Any access to St1 Biokraft's IT infrastructure must be authorized and used solely for permitted business purposes and comply with cybersecurity obligations under NIS2 and other applicable regulations.

Use of email, shared platforms and communication tools must comply with St1 Biokraft's cybersecurity guidelines and not be used to share offensive, illegal or confidential materials externally.

Acting with Integrity and Compliance

Legal and Regulatory Compliance

At St1 Biokraft, doing the right thing is about how we build trust, stay safe, and succeed together. Therefore, we are committed to full compliance with the laws and regulations of every jurisdiction we operate in and expect the same from our Partners.

Anti-Corruption

We have zero tolerance for any form of corruption. Partners shall refrain from and actively combat all forms of corruption, including bribery, facilitation payments, kickbacks and other unethical influence. This includes refraining from offering or accepting gifts or benefits that could be perceived as improper. Particular caution must be exercised when dealing with government officials. Partners must maintain accurate records and ensure transparency in all transactions.

Competing Fairly and Lawfully

We believe in healthy, honest competition. It drives innovation, sharpens our performance, and strengthens the value we bring to our customers, partners and society. Playing fair is how we earn trust and build lasting impact. We compete fairly and comply with laws that protect competitive markets and expect our Partners to act in the same way.

Partners shall uphold fair competition and comply with all applicable antitrust and competition laws.

Partners shall not:

- Enter into price-fixing, market allocation, or bid-rigging agreements.
- Exchange sensitive commercial information with competitors.
- Abuse a dominant market position.

Any agreements with competitors that may limit free competition are strictly prohibited.

Complying with Trade Compliance and Sanctions

Doing business across borders brings us the opportunity to grow our impact but it also comes with significant responsibilities. Trade compliance protects St1 Biokraft license to operate globally, safeguards us from legal and commercial risk, and prevents disruptions that could affect our people, customers, and communities. We strictly follow international trade laws, economic sanctions and export control regulations in every market where we operate. Our Partners are expected to act in the same way.

Partners must comply with all applicable trade laws, export control regulations and sanctions regimes. They must not supply goods or services that violate international or local trade laws, including those imposed by the EU, US, UK or UN. Partners shall notify St1 Biokraft immediately if:

- They, or any key person/entity related to them, becomes subject to sanctions.
- Any goods, services or technology supplied become subject to restrictions.

Gifts and Hospitality

Partners may only offer or accept gifts or hospitality if they are modest, infrequent and have a legitimate business purpose. Lavish or frequent entertainment or anything that could influence decision-making is prohibited. Suppliers must maintain transparency and report any gifts or hospitality given or received that exceed local thresholds.

Sustainability and Responsible Partnerships

At St1 Biokraft, we choose our partners carefully, not just for what they do, but how they are doing it. We expect all third parties, suppliers and service providers to operate legally, ethically and in line with our values.

That means complying with all applicable laws and regulations in the context of each operation and in every country where they operate. It also means going further: embracing the principles in this Business Partner Code and applicable framework for external parties, which reflects the standards we also expect of ourselves. Everyone willing to conduct business with us, regardless of the country they operate in, shall respect the same principles. These are the minimum standards we expect, and we encourage all our partners to join us in striving to go above and beyond whenever possible. We therefore choose to follow voluntary principles as outlined in our company policies, which our partners are also expected to respect.

ESG Responsibility

Partners must implement appropriate due diligence processes to:

- Assess and manage social, environmental and human rights risks.
- Avoid causing or contributing to adverse impacts.
- Monitor and influence their own supply chains. Subcontracting needs to be agreed upon in advance and the same principles apply to any subcontractors of our partners.

Environmental Sustainability

Partners shall:

- Comply with environmental laws and permits.
- Reduce carbon emissions and energy use.
- Prefer renewable energy and environmentally responsible inputs.
- Apply the precautionary principle.

ESG Due Diligence

We apply a risk-based approach when assessing new and existing business partners to ensure alignment with our values and responsibilities. Our evaluation tools include:

- Due diligence questionnaires
- Screening for sanctions, politically exposed persons (PEPs) and adverse media
- Site visits and supplier audits

We take into account factors such as jurisdictional risk, the nature and materiality of services and partner's reputation. If significant ESG risks are identified, Partners are expected to present clear mitigation plans. In certain cases, onboarding may be delayed or restricted until appropriate safeguards are in place.

This process is supported by our Business Partner Evaluation Procedure and tracked through our dedicated due diligence register.

Responsible Sourcing

We are committed to ethical and sustainable sourcing in our biomass supply chain. Our approach prioritizes integrity, environmental stewardship and full transparency. Key expectations from our Partners include:

- Compliance with applicable food waste and biofuel regulations
- Traceability and clear documentation across the supply chain
- Protection of biodiversity and prevention of land-use conversion

We further expect our Business Partners to:

- Cooperate with audits and provide requested documentation
- Proactively report environmental incidents or supply disruptions
- Notify us of any changes in sourcing regions or subcontractors

Our sourcing practices support the EU Taxonomy for sustainable activities and contribute to broader climate and circular economy goals.

Monitoring and Subcontractors

Partners must:

- Cascade this Code to subcontractors and key suppliers
- Conduct audits, maintain documentation, and grant access when requested
- Cooperate in any compliance verification activities.

Speaking Up

At St1 Biokraft, we are committed to fostering a culture of openness which we believe is the foundation of a safe and responsible workplace. This extends to our business partnerships across the entire value chain, therefore

Partners must:

- Encourage internal reporting of concerns
- Protect whistleblowers from retaliation
- Report to St1 Biokraft without delay any actual or suspected breaches

The link to our reporting channel on our website is [Whistleblower | St1 Biokraft](#).

Breaches and Enforcement

Violations of this Code may result in:

- Remedial measures
- Suspension of business
- Termination of contract
- Notification to authorities.

Training and Awareness

St1 Biokraft will:

- Share the Code with all Partners during onboarding and contract renewal
- Conduct training for the relevant employees)

Partners are responsible for:

- Cascading this Code internally and within their supply chain
- Nominating a compliance contact
- Participating in audits and follow-up reviews.

Governance

The Code is owned by the CEO of St1 Biokraft and managed by the Legal / Compliance and Sustainability jointly.

The Code is reviewed annually and updated to reflect new risks, laws and stakeholder expectations.

This Code is a reflection of our Safety First mindset and our four culture Cornerstones – Be Collaborative, Be the Expert, Be Commercial and Be Open . Combined with them and St1 Biokraft Code of Conduct, this Code represents our shared commitment to doing what is right.

This Business Partner Code of Conduct was last approved on the 27th of November 2025 by the board of St1 Biokraft AB.

St1 Biokraft AB, Board of Directors