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BIOGAS

# Code of Conduct

VERSION 1.1 2024

## Our common ground rules

Biokraft is a company with sustainability as its core business. Therefore, it is also a matter of course that we conduct our business in an ethical, responsible and sustainable manner. This means that we comply with applicable laws and regulations in the countries in which we operate and that we both act and do business in a way that is correct and proper. This is also reflected in our culture, which is based on our values of Respect, Knowledge, Joy and Passion.

At the same time, it is not always easy to determine what is right in everyday life. We are often faced with complex issues, different industry standards, or situations where it is not clear how to act. That is why we have gathered our principles of business ethics in a Group-wide Code of Conduct, with the aim of clarifying our position on various issues and how we handle different situations.

Our Code of Conduct applies to all employees within the Group, to consultants and to suppliers who work and act on our behalf and in our name. There is also a corresponding Business Partner Code of Conduct for suppliers and other business partners.

We have a clear picture of what kind of company we want to be and in what way we want to contribute to a better and more sustainable world. For example, we do not tolerate any form of corruption, anti-competitive practices, bribery, discrimination, harassment, or unnecessary burden on the environment.

The Code of Conduct is important because it describes the way in which we conduct our business, what our employees can expect from us as an employer and what is expected of each individual employee. It is also important because it describes what our customers, suppliers and other stakeholders can expect from us. In an ever-changing world, trust is one of the most important building blocks of every business and organization. Our Code of Conduct ensures that we can trust each other and that others can have confidence in us.

If you are faced with a situation where you feel unsure, you can always consult your immediate manager or contact our Group Head of Legal.

Matti Vikkula  
CEO and president



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## Our values

Our values guide us in our daily work and how we act towards each other.

Our values are RESPECT, KNOWLEDGE, JOY & PASSION.

### BY RESPECT WE MEAN:

- ✓ That we treat colleagues and partners with dignity and kindness
- ✓ That we show consideration
- ✓ That we do not discriminate against or harass our colleagues or partners
- ✓ That we are there for each other

### BY KNOWLEDGE WE MEAN:

- ✓ That we share our knowledge and expertise
- ✓ That all employees know how to navigate the organization
- ✓ That all employees are an important part of the company
- ✓ That we will be a leader in the biogas process

### BY JOY WE MEAN:

- ✓ That we have a good work environment and work community
- ✓ That we see opportunities
- ✓ That we are committed
- ✓ That we feel a sense of pride in what we do

**OUR PASSION IS TO  
MAKE A DIFFERENCE!**



## Implementation & Compliance

### Who does this policy apply to?

The Code of Conduct applies to all employees within the Biokraft Group. It also applies to consultants, representatives, partners or others who perform work on our behalf under Biokraft's or subsidiaries' brands.

The Code of Conduct has been adopted and approved by the Board of Directors. Our CEO is ultimately responsible for compliance with the Code.

### What is expected of me as an employee?

All employees are expected to have read and understood the Code of Conduct. If something is unclear, each employee is expected to ask questions to their immediate manager or to our Group Head of Legal to understand what it means.

All employees are also expected to take responsibility for ensuring that we comply with our Code of Conduct and act in an ethical and sustainable manner in their day-to-day work. This means that we do not compromise on safety or the standards we have set ourselves to uphold, and that we are continuously trying to improve our processes and ways of working.

It is also the responsibility of all employees to pay attention to the behaviour of employees or business partners that is not in line with our Code of Conduct. If you notice behaviour that violates the Code of Conduct, raise the issue with your line manager. You can also turn to HR or our Group Head of Legal. If the breach is so serious that none of these are an option, you can use our whistleblower function where you can remain anonymous.

### What happens if I don't follow the code?

Our Code of Conduct is one of our most important tools for building and managing trust both internally among ourselves and externally from our shareholders, financiers, suppliers, customers, and partners. We therefore take violations and non-compliance extremely seriously.

All reported violations are reviewed in the most objective and fair manner possible. Violations can lead to disciplinary action such as termination or termination of contracts. We do not allow retaliation against anyone who raises a potential concern under this Code or who participates in an investigation.

### Who should I contact if I have questions?

In the first instance, you should contact your immediate manager. You can also contact HR or our General Counsel. If you have questions about very serious breaches or confidential issues, you can use our whistleblower function.

If situations arise where the Code of Conduct does not provide specific guidance, you can also use these questions to determine what the right decision is:

- What is the legal, ethical, and moral decision to make?
- Will the decision or the consequences of it harm Biokraft or its operations in any way if it becomes public knowledge?
- Would a colleague, customer, supplier, shareholder or other stakeholder agree with or agree with the decision?
- How would your family feel if they knew about the decision?



### A checklist of your responsibilities

- ✓ Protect our business assets, including physical assets such as computers, phones, mobile devices, machinery, vehicles, and intellectual property, such as patents and proprietary technologies, ideas, and specialized knowledge.
- ✓ Immediately report any suspicions of an illegal activity.
- ✓ Never accept or offer a bribe or an improper gift.
- ✓ Be honest and accurate when reporting costs, sales, and other financial information.



# 2 Our operations

## We keep our promises

We produce and sell biogas produced from different substrates, such as different types of manure and food waste. Our customers expect us to deliver the promised quantity and quality, and on time. That we keep our promises is extremely important for our customers' trust in us.

To ensure our production, we work according to the Biokraft Business System. It is our management system for systematic and continuous improvement, the right focus and fact-based decision-making. It is based on four pillars in the following order of priority:

**Safety:** Safety is at the heart of everything we do. A safe workplace for our employees is always the first priority.

**Quality:** We make sure that we produce and deliver the right quality to both internal and external customers. We do not compromise on our quality and do not provide misleading information or withhold information regarding the quality of our products.

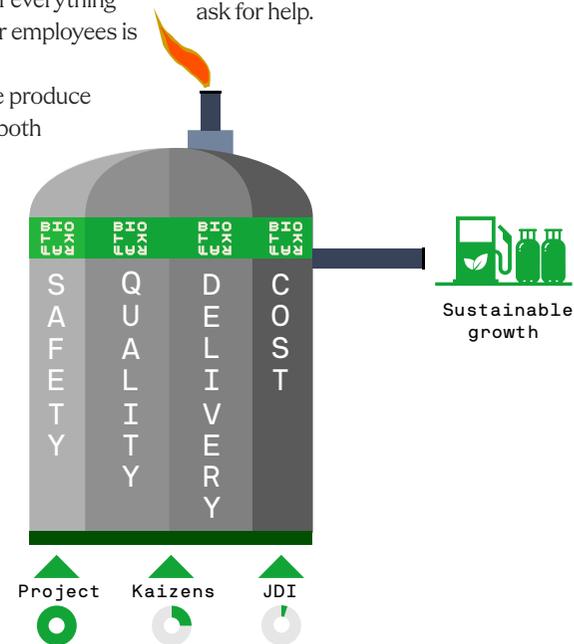
**Delivery:** We make sure we deliver on time.

**Cost:** We have control over our costs and streamline our production to create better profitability.

### What does this mean for me?

All employees are expected to familiarise themselves with and follow safety regulations and not deviate from legal requirements, internal routines, or processes. It also includes being aware of, understanding and complying with specific regulatory requirements that apply to specific markets, such as environmental protocols intended to certify our products for export.

All employees are expected to help each other so that we can maintain a high level of safety, quality and delivery reliability towards our customers. We do it together and all employees should feel confident that they can ask for help.



## Our own environmental responsibility

The very core of our business is a sustainable product and our purpose is to contribute to a sustainable world that produces bioenergy and plant nutrients in a circular cycle. But just providing products that are good for the environment is not enough, we also have our own responsibility for how we produce and what steps we take to continuously improve our own climate impact.

In our sustainability strategy, we have defined material issues that we have set goals for and are working to achieve or improve. On a day-to-day basis, this means that we work to improve our processes, optimize energy consumption, minimize nuisances such as odours and environmental impact when we build new facilities.

### 🔗 What does this mean for me?

Sustainability is everyone's responsibility. All employees are expected to take personal responsibility for their area and try to achieve continuous improvement in the form of more efficient processes, reduced resource consumption or the choice of better and more environmentally friendly products.



# 3 We as a company

## Anti-bribery and anti-corruption

Corruption is the misuse of entrusted power to benefit oneself or someone else. This can be done in many ways, both in the private and public sectors. Not only is corruption illegal and can affect trust in the company, but it can also have a negative impact on society, hinder economic growth and damage democratic institutions. At Biokraft, we believe that all forms of corruption are unacceptable, and we apply openness and transparency as far as possible.

### Gifts, entertainment, and representation

Gifts, entertainment, or representation of low value can also be counted as bribery if there is an intention to influence the recipient's decisions or actions. Therefore, we do not accept or give gifts or participate in entertainment that may have undue influence on decision-making processes regarding our business. All gifts or entertainment must be open, of reasonable value and appropriate in relation to the business relationship. Particular caution applies during ongoing business negotiations.

Particular caution also applies to gifts and entertainment for the public sector. With the exception of low-value, company-branded items, we avoid giving gifts, offering entertainment, or representation to public officials. During ongoing permit matters or other decision-making processes, we completely refrain from gifts and entertainment to the public organization or authority concerned.

#### 🔗 What does this mean for me?

You may not offer, give, promise, or accept anything of value to or from a third party for the purpose of gain-

ing an advantage or influencing a decision. This means not receiving or giving gifts, participating in, or invite to entertainment such as sporting events, or participating in or invite to other events such as expensive restaurant visits in order to give Biokraft an undue advantage. Remember that even if it was not the purpose of the gift, it can still be perceived as an attempt at corruption or bribery by others. Use your good judgement and always consult your immediate manager or our Group Head of Legal if you are unsure.

### Sponsorships and donations

Biokraft may choose to sponsor various events and events for marketing purposes and to strengthen Biokraft's brand and image. We may also choose to donate to charities or local organizations for marketing purposes or as part of our overall sustainability efforts. We are careful to ensure that sponsorships or donations cannot be linked to decision-making processes or in any other way can be considered to influence decisions that unduly benefit Biokraft.

We do not sponsor the private interests of individual employees. All sponsorship and donations are handled by Biokraft's communications department.

#### 🔗 What does this mean for me?

Individual employees are not allowed to sponsor local sports teams, tournaments, conferences and other events on their own initiative, or to make donations in the name of Biokraft. If you have ideas for sponsorship or suggestions for contexts where Biokraft could be visible, you are welcome to contact our VP of Communications.

## Responsible business

### Trade sanctions and export controls

As a company operating in multiple markets, our business, customers, suppliers, and partners may be subject to trade sanctions and other restrictions. We have policies, guidelines, and procedures in place to comply with applicable international trade rules that regulate who you can trade or have financial dealings with and how you can import, export and move products, raw materials and technology. Violating trade regulations can lead to significant legal and financial consequences for Biokraft and the individuals responsible and damage our reputation.

#### 🔗 What does this mean for me?

By following our processes and procedures, we ensure that we do not enter business relationships with sanctioned parties. If you discover or become aware of circumstances that indicate a breach of sanctions or that we are not following our procedures and processes, you must immediately report it to your immediate manager or to our Group Head of Legal.

### Fair competition

We believe that our products can be successful on their own merits in a competitive market and that a fair market benefits us. We comply with competition laws in the markets in which we operate. It also means that we treat our suppliers in a professional manner and select suppliers and partners based on objective criteria.

#### 🔗 What does this mean for me?

You may not share or discuss business-sensitive information with competitors or take any action with competitors that has an anti-competitive effect or has such an effect.

If you participate in various industry forums where competitors are also present, it is important to be careful. Employees who need it due to their professional role or duties receive training in identifying situations where it is important to take antitrust and competition law into account. If you have not participated in such meetings, please read more about what applies to industry association meetings in our more detailed Competition Law Guidelines. It is forbidden to discuss sensitive information such as price levels, market shares and strategies.

## Conflicts of interest

A conflict of interest is a situation where private interests or other loyalties may affect an employee's loyalty, professional judgment, or professional performance.

A personal conflict of interest can arise when a personal relationship or activity may affect one's judgment or ability to objectively perform one's duties. The appearance or suspicion of a conflict of interest may also pose a risk. As employees, we must never let shared loyalties, personal gain, or benefits come at the expense of the company's interests.

An organisational conflict of interest may arise when Biokraft or its subsidiaries have conflicting relationships with entities such as authorities or municipalities. For example, a conflict may arise when we collaborate with local authorities in the development of infrastructure or guidelines around our facilities while also wanting to sell our products to them.

#### 🔗 What does this mean for me?

It is not always easy to determine whether something is a conflict of interest or not. A basic rule is that we always strive to make objective and objective decisions. Cooperation with family members, family businesses or other close relatives that could lead to a potential conflict of interest shall be avoided.

USE THESE QUESTIONS IF YOU ARE FACING A SITUATION THAT COULD BE A POTENTIAL CONFLICT OF INTEREST. YOU CAN ALSO CONSULT YOUR IMMEDIATE MANAGER OR OUR GENERAL COUNSEL .

- Will this activity or relationship affect, or appear to affect, my ability to make sound and unbiased business decisions or otherwise interfere with my ability to perform my job duties?
- Will I receive personal benefits, or will family members benefit from my involvement in the activity based on my employment and position within the Biokraft Group?
- Will I use the company's assets for personal gain?
- Will my participation mean that I put my personal interests ahead of what is best for the company?
- Will it damage Biokraft's brand and reputation if it became widely known?

## Financial principles

### Openness and transparency in financial communication

For Biokraft, it is important to report and communicate in a transparent and truthful manner in order to convey an accurate picture of the company. We report our financial transactions in accordance with generally accepted accounting principles and report truthfully on environmental, social and governance (ESG) principles. It maintains the integrity of our financial reporting and strengthens our internal decision-making.

Many of our stakeholders rely on us to report financial information in an honest, complete, and timely manner. These include public authorities, credit rating agencies and institutional and individual investors. Incorrect financial reporting could undermine their trust, affect our reputation and result in the company being subject to fines and penalties.

#### 🔗 What does this mean for me?

Be honest and accurate when reporting or registering information about our business. If you submit or approve expenses, make sure they accurately reflect the transaction and comply with our policies, guidelines, and procedures. If you discover an error in a financial record or suspect that fraud has occurred, report it immediately to your line manager or our CFO.

### Combating insider dealing

Inside information is information that, if it became public knowledge, would have a significant impact on the value of shares and other securities. Insider trading involves using such information to trade stocks or other securities or sharing that information with others who may use it to trade. Insider trading is illegal, and we take great care to protect confidential information.

The definition of insider information does not require that the information must originate within the listed company, but only that it must be attributable to the listed company. A decision in a large unlisted company to buy products, enter into an agreement with or invest in a smaller listed company can therefore be inside information.

#### 🔗 What does this mean for me?

Any employee who gains access to information that can be classified as insider information has a responsibility to keep the information confidential until the information has been made public. If you gain access to insider information, it is not permitted to disclose the information to family members or friends, or in any way recommend family, friends or others to trade shares in the company to which the information applies.

If you suspect that information that could be inside information has accidentally left the company, you must immediately contact our CFO and report the incident.

### Anti-money laundering

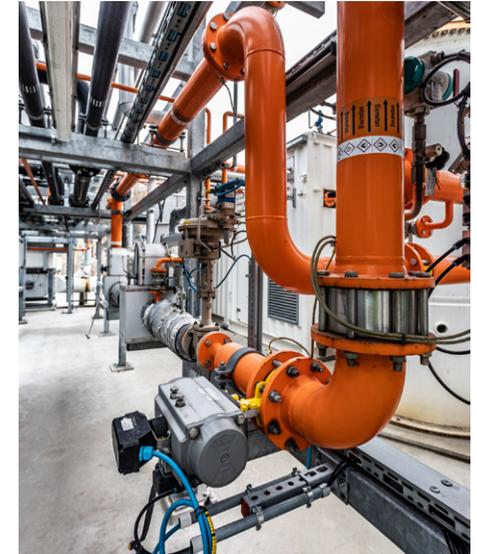
Money laundering involves criminals hiding the fact that money or other property comes from illegal activities by making it look like it comes from a legitimate source.

At Biokraft, we ensure that all revenues are generated in an ethically defensible and legal manner. We prevent money laundering by being transparent, being careful with our agreements and following standard processes in all financial activities. We make sure to know our customers and suppliers and do not do business with unusual payment methods or abnormal terms.

#### 🔗 What does this mean for me?

If you discover signs of or suspect money laundering, you should immediately report it to your immediate supervisor or to our CFO.





## Handling of trade secrets and confidential information

Biokraft is a knowledge-based company and it is our collective knowledge and expertise that makes us unique. A large part of it is trade secret information and is of great value to us. Confidential information can be, for example, methods, concepts, recipes for the production of biogas and our proprietary processes and techniques. These must be protected both for reasons of competition and in order not to lose their character as trade secrets and thus the protection provided by the Trade Secrets Act. All employees have a responsibility to preserve trade secrets and confidential information that, if it became public knowledge, could harm Biokraft or our business. Confidential information can be, for example, strategic choices and

market information.

We also have a responsibility to protect the confidential information and trade secrets of our customers and suppliers.

### 🔒 What does this mean for me?

Make sure you have the authority and legitimate business purpose to share certain information. Do not share confidential information with suppliers or other third parties without having agreed on confidentiality or established a special non-disclosure agreement.

Never post confidential information or trade secrets on social media or discuss them in public contexts. It may also

include discussing sensitive information on the phone in, for example, public transport. When traveling, never leave your computer or important papers out of sight.

An important aspect of today's technological development and easily accessible free services for AI and translation, for example, is not to use these for sensitive or secret information. These services store the information and we do not have control over its security. Instead, use the services that are available within the framework of our IT environment.

Your responsibility to protect trade secrets and confidential information may persist even after you leave your employment or withdraw from a contract as a consultant or business partner.

## Human rights

For Biokraft, it is a matter of course to respect internationally recognized human rights. This means that we comply with applicable laws and agreements regarding terms of employment, including working and rest times, as well as compensation and benefits. We do not tolerate any form of modern slavery, including forced labour or human trafficking. We respect children's right to personal development and education, and we do not use child labour. We respect employees' rights to freedom of association and collective bargaining, as well as the choice of all employees to refrain from joining a trade union.

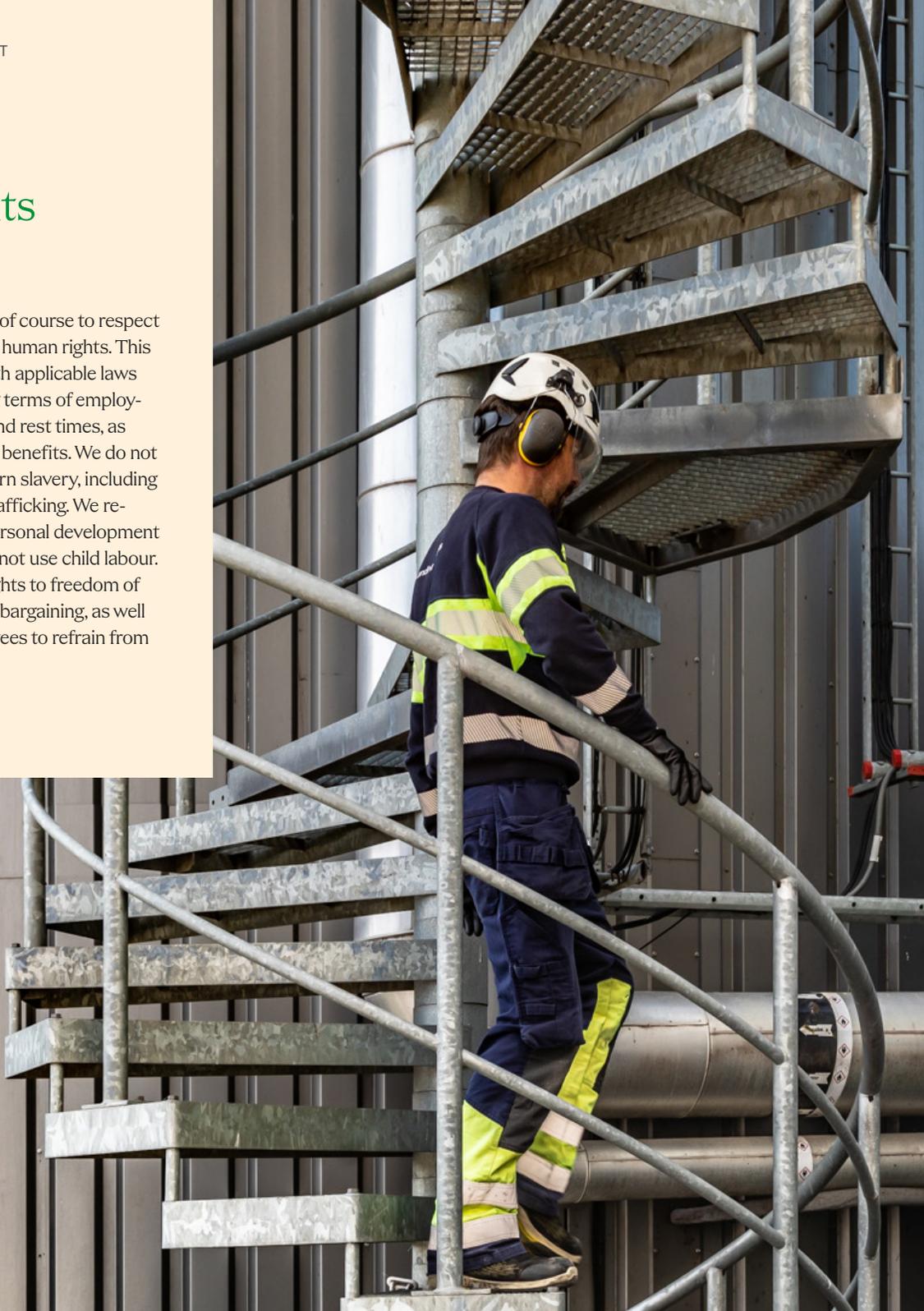
## Communication and Media Relations

Biokraft strives to be open, proactive and accessible in our contacts with the media and stakeholders. In order to maintain trust in Biokraft, it is important that we convey a clear and honest picture of our operations. It is also important that information is given in a correct way, through appointed spokespersons. A spokesperson is an employee who, through their position or professional role, is authorized to speak about individual issues or topics.

We appreciate and welcome that the media want to report on our activities. At the same time, it is important to remember that there may be times that are less suitable, or information that for various reasons is sensitive to share, which means that we cannot comment. Whether we are to comment and, if so, who is to be the spokesperson, is decided by our VP Communication based on the area of responsibility or subject matter. Employees who have not been assigned a role as spokesperson may not speak in the media on behalf of the company.

### 🔗 What does this mean for me?

If you are approached by a journalist, always be friendly and polite. If you receive questions from a journalist, you should always ask for them to be sent to you in writing and contact our VP Communications directly.



# 4 We as an employer



## Diversity, inclusion, and equal treatment

Biokraft strives to be an attractive employer where all employees want to be ambassadors for our company. We want to build our culture based on our values with mutual respect based on clear missions, goals and expectations.

We strive to be a workplace characterized by diversity, where everyone comes into their own and can contribute with their skills and knowledge. It is also a matter of course that every employee, regardless of background and identity, can contribute, lead and grow with us.

All employees are given equal opportunities based on competence, experience, and performance, regardless of gender, transgender identity or expression, ethnicity, religion or other belief, age, disability, sexual orientation, nationality, family situation, political opinions, trade union membership, social background and other characteristics protected by law.

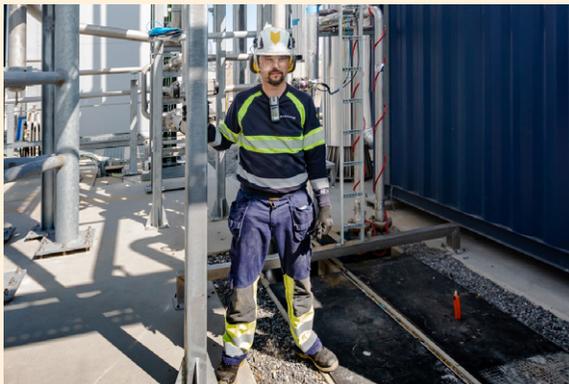
## Health, safety, and well-being at work

We believe that accidents, incidents, work-related illnesses, and unsafe conditions can be prevented. When we work with our business management system, Biokraft Business System, we make sure that safety is our number one priority. This ensures that in our planning and operation we comply with current work environment regulations and requirements in our work environment.

We have zero tolerance for all forms of discrimination, harassment, and bullying.

### 🔗 What does this mean for me?

Take responsibility for your own safety and the safety of others around you. Correct or report hazards and address any risky behaviour. You can either talk to your colleague directly or to your immediate manager if you notice unsafe situations. It is your responsibility to know and comply with all safety requirements, including the use of personal protective equipment. Never take shortcuts or ignore necessary security procedures.



## Handling of personal data and confidentiality

Digitalization is an important part of the development of our business and efficient use of data is crucial for us to be able to continue to live in continuous improvement. We are committed to protecting the data of our employees, customers, and business partners. Handling personal data with respect and in accordance with applicable legislation is an important way for us to build and maintain the trust of our stakeholders. We expect all employees to handle personal and confidential information securely everywhere – in the office and facilities, outside of work and at home.

### 🔗 What does this mean for me?

Collect and use only the personal data that is necessary and necessary for the activity to be carried out. You may not use this data for purposes other than those for which it was collected. You also need to ensure that they are stored and handled securely. This means that only people who really need to have access to them should get it. When the personal data has fulfilled its purpose, it must be deleted.

If you have any questions about what counts as personal data and how it may be used, please contact our General Counsel. If you have questions about how personal data should be stored to be secure, please contact our IT Department. If you discover that someone is handling personal data negligently, report it to your immediate manager or to our Group Head of Legal.

## Use of social media

Social media includes all digital communication channels that allow individuals to create and share content and publish comments. Biokraft is a knowledge-based company and, like all companies, we have trade secrets and processes that, for various reasons, we do not wish to share publicly.

This Code of Conduct applies to communications related to job responsibilities and to private communications that may have an impact on the company. In personal activities, all employees should be respectful and remember that their behaviour can affect how others see us, who we are and what we stand for as a company.

All employees should also keep in mind that the internet is a public place and that the content created, shared and published may be used by others outside of our control. The publication of sensitive content, images or videos depicting non-public parts or parts related to our trade secrets is not permitted. Permission to publish pictures and videos of colleagues must always be obtained before publication.

The use of private chat or messaging services for work-related communication is not permitted.

### 🔗 What does this mean for me?

Use good judgment when acting online and creating, sharing, and commenting on content on social media. Show consideration and respect your colleagues' wishes if they do not want to be in pictures or videos that you publish on social media.

Also, be aware of the difference in private, social, and corporate communication, and remember that most social platforms are not approved for business-related communication between colleagues or between internal and external stakeholders.

# 5 Whistleblower function

## Whistleblowing

At Biokraft, we work actively to create a safe and secure environment for everyone who meets us, regardless of whether you are an employee, job seeker, consultant or supplier. The earlier irregularities or irregularities are discovered, the greater the chance of remedying the situation.

Reporting serious irregularities that violate applicable legislation or our Code of Conduct is called whistleblowing. It is the responsibility of all employees to report any irregularities or if there is a suspicion that they are taking place.

Biokraft does not accept any retaliation against whistleblowers, and we have procedures in place to protect employees who choose to report irregularities. An employee who subjects another person to retaliation will be subject to disciplinary action, which may lead to dismissal.

### What should I report?

Serious irregularities which constitute a breach of the law or those the disclosure of which is in the public interest; It may also be a violation of our Code of Conduct. Reporting shall only relate to irregularities committed by people at Biokraft within the framework of our operations. You should not blow the whistle on matters related to your own employment or personal relationships with colleagues. Such issues should instead be raised with your immediate manager.

### How should I report?

In the first instance, you should turn to your immediate manager or to HR, but if you for various reasons cannot or do not want to, we have an internal whistleblower function through our tool &Frankly. You can access the function through our intranet or through a link on our website, [www.biokraft.com](http://www.biokraft.com)

### Can I remain anonymous?

Yes. Your report will be treated anonymously if you so choose, and the person handling the follow-up case is subject to a statutory duty of confidentiality.

### What happens after I report?

Upon receipt of a report, Biokraft will initiate an investigation into the matter and then take appropriate action. The matter is handled by a committee consisting of HR and Legal. The committee is subject to a statutory duty of confidentiality. As a reporter, you will always receive feedback if you have not waived further information or submitted a report without providing any form of contact information.

More detailed information about whistleblowing can be found in our Whistleblower Policy.

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WANT TO KNOW MORE ABOUT OUR POLICIES AND GUIDELINES?

ALL OUR POLICIES AND GUIDELINES ARE COLLECTED ON OUR INTRANET, WHERE YOU AS AN EMPLOYEE CAN READ MORE ABOUT SPECIFIC ISSUES OR SITUATIONS LINKED TO DIFFERENT SECTIONS OF THIS CODE OF CONDUCT.

