

Code of Conduct

We are St1 Biokraft, a company of experts determined to be the rising stars on the Nordic biomethane landscape. Our mission to drive the green transition starts with how we treat each other, our partners through the whole biogas value chain, and the world around us. This Code of Conduct (Code) is our shared commitment to act with integrity, protect what powers us and make sure that Safety always comes first. Our four cornerstones “Be Collaborative, Be the Expert, Be Commercial and Be Open” guide every decision, big or small, and shape the culture we build together as One Team. Whether you work in our plants, in the field or behind a screen, and in all jurisdictions where St1 Biokraft operates you are encouraged to embrace this Code as a reflection of who we are and the future we are creating: sustainable and responsible.

Guided By Safety and Cornerstones

Introduction and Purpose

At St1 Biokraft, how we work matters just as much as what we do. This Code guides our choices: acting with integrity and safety, treating people fairly, protecting what we are trusted with, and doing the right thing.

The Code outlines professional and ethical standards for of everyone who represents St1 Biokraft: employees, contractors, board members, partners and others. No matter where we work, we are one team, held to the same high standards.

Safety comes first, last, always at the center. Guided by our culture Cornerstones Be Collaborative, Be the Expert, Be Commercial and Be Open, this Code helps us build a safe, fair and responsible workplace for all.

Our Commitments

We act with integrity, professional behaviour and respect for people and the planet. We commit to:

- Keeping our workplaces safe and healthy
- Respecting human rights and fair working conditions
- Treating everyone equally and embracing diversity
- Protecting the environment and cutting our climate footprint
- Following all laws, rules and company policies

Our Culture Cornerstones

To achieve our ambitions, we have developed a powerful, far-reaching culture. Our culture is bringing us together as One Team, with One Dream, working towards One Result: to create a better future for generations to come.

Our culture is built on four solid cornerstones, and the magic happens when we integrate all four cornerstones into our daily actions. They guide us in the way we work, as individuals and as a team, as well as when facing our customers and the world around us.

Our cornerstones help us to thrive and grow, as we aspire to make St1 Biokraft the leading Nordic biomethane company. Our culture cornerstones are: Be Collaborative, Be the Expert, Be Commercial and Be Open.

Safe, Fair and Inclusive

Human Rights and Fair Treatment

Respect for human dignity and fairness is at the heart of who we are. We uphold internationally recognized human rights standards everywhere we operate, including the UN (United Nations) Guiding Principles on Business and Human Rights, ILO (International Labour Organisation) Conventions and applicable local laws.

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. Dignity, fairness and inclusion are essential for a safe and successful workplace.

Everyone deserves the opportunity to thrive. That is why we make decisions on hiring, training, promotion and pay based on qualifications, experience and business needs, and never on bias or stereotypes. Discrimination or harassment of any kind has no place here, including based on race, gender, sexual orientation, gender identity or expression, religion, background, citizenship, disability, age, or any other trait protected by law.

Safety First means creating a workplace where you can bring your whole self. On site, in the office, or across borders, - respect is everyone's responsibility.

Our four Cornerstones guide us to how we live this every day:

- Be Collaborative. Treat teammates, customers and stakeholders with dignity and respect. Listen actively and respond with care.
- Be Open. Speak honestly. Embrace different points of view. Make space for others to be themselves.
- Be the Expert. Own your impact. Call out disrespect when you see it. Help build a culture where professionalism and fairness go hand in hand.
- Be Commercial. Make smart decisions that reflect not just performance, but people. Long-term success depends on trust, safety and inclusion.

We all play a role in creating a safe, respectful, inclusive and happy workplace. If something feels wrong, speak up and know that your voice matters. Through training, surveys and feedback we keep improving together.

Labour Rights and Freedom of Association

Everyone who works with us has the right to freely choose and join a trade union without fear of intimidation or reprisal, in line with national law. No one will be punished or treated unfairly for using this right.

We strictly ban:

- All forms of forced labour or human trafficking
- Abusive practices such as withholding identity documents
- Child labour, in line with international standards

Our business partners are held to the same standards as set out in our Business Partner Code of Conduct.

Workplace Safety and Wellbeing

Safety is our first priority. We are committed to providing a safe and healthy workplace for everyone who works at or with St1 Biokraft.

Safe Workplace and Incident Prevention

At St1 Biokraft, safety is a mindset. Safety First is the foundation of how we work, how we lead and how we look out for one another. This means physical safety, mental wellbeing and a respectful daily work culture.

A safe and healthy workplace helps everyone succeed. It supports performance, attracts talent and lets people bring their best to work. Safety is everyone's responsibility, and it starts with awareness and action every day.

Keep safety at the center. Follow the rules that apply to your job and site. Know the risks, use the right protective equipment, and stop the task if something feels unsafe. You are expected and empowered to speak up.

Report incidents, hazards and unsafe behaviour early. That way, we can learn from them and prevent harm. You don't need to have all the answers. Raising the concern is what matters.

Our safety system includes:

- Regular inspections and risk assessments
- Incident investigations and root cause analysis
- Leadership and behavioural safety training

Mental Health

Mental wellbeing matters. Stress, burnout or toxic behaviour affect how we work. If you need support, ask for it. Managers and HR are here to help.

We never tolerate bullying, harassment or intimidation of any kind. Be alert and report any concerns immediately. Managers are expected to create psychologically safe teams where people feel heard and supported.

Our approach is grounded in our Cornerstones:

- Be Collaborative. Safety is a shared responsibility.
- Be the Expert. Know your role, know the risks and take them seriously.
- Be Commercial. Safe and healthy teams deliver better results.
- Be Open. Concerns must be raised, not ignored.

We keep a high standard because we believe every person has the right to work in a workplace where they are protected, respected and supported.

Protecting What Powers Us

The knowledge we create, the data we hold and the tools we use every day are what fuel innovation, keep St1 Biokraft moving forward. From laptops and field equipment to financial systems and our know-how owned by St1 Biokraft, these assets fuel innovation and power our role in the green transition.

If these assets are lost, misused, or exposed, even by mistake, they put safety, trust and our long-term success at risk. That's why protecting them is non-negotiable. We use company resources responsibly and only for authorized purposes, always guided by Safety First and our Cornerstones.

What this means in practice:

- Use assets with care. Equipment, materials and systems are for work, not personal use.
- Keep digital tools safe. Use only approved hardware and software, protect your login and watch for phishing or cyber threats.
- Protect information. Data, research and business insights are confidential. Share only when authorized.
- Be responsible with finances. Record, report and approve costs honestly and treat company funds with the same care as your own.
- Safeguard intellectual property. Our designs, processes and technologies are built on original ideas and hard work. They are key to our future. Protect them as carefully as you would physical equipment.

St1 Biokraft's assets include information, physical tools, technology and finances. Protecting them is a responsibility we all share.

Intellectual Property

St1 Biokraft is a knowledge-driven company, and know-how is one of our most valuable assets. The methods, processes, designs and ideas we create are what keep us competitive and fuel the green transition. Protecting this intellectual property (IP) is protecting our future.

Every employee is a guardian of IP. Much of it lives in our daily work. If it is mishandled, even by accident, it can lose its legal protection or give competitors an advantage. Safety First also applies here: confidential information must be stored securely, identified correctly, and never shared in public or informal settings.

What this means in practice:

- Be the Expert. Know what counts as IP, from a patented process to a confidential production method, and treat it with the same care as physical equipment.
- Be Collaborative. If you create something that might qualify for IP protection, report it. We will help assess and safeguard it.
- Be Commercial. Handle IP responsibly. Even a small mistake with IP can cost.
- Be Open, with care. Share only when needed, and with safeguards like NDAs (Non-Disclosure Agreements). Avoid discussing confidential matters in public.

We also respect others' IP. We do not misuse confidential information from suppliers, customers or past employers. And remember: your responsibility to protect St1 Biokraft's IP continues even after you leave.

Use of Resources and Information

Our physical, digital, financial and intellectual resources are for business use only, Use them responsibly.

This also means keeping safe information that we create and handle every day. Some of it belongs to the company, some to our partners, and some to people. Keeping data safe is everyone's job and key to trust, safety and compliance.

Data Protection and Confidentiality

The trust of our employees, partners and customers depends on how well we protect the information they share with us. Confidentiality of operational data or personal details is everyone's responsibility.

Our confidential information includes:

- Intellectual property such as methods, processes, recipes, designs, trade secrets and software
- Business strategies such as research, forecasts and operational plans
- Commercial insights such as customer and supplier data, pricing and contract terms

This information keeps us safe and competitive. If exposed, even by mistake, it can harm people, damage trust and put our business at risk.

Keep it private. Don't disclose or misuse St1 Biokraft or partner information, including:

- Strategic plans, financial data or technical specifications
- Employee data, supplier contracts and arrangements
- Any St1 Biokraft non-public materials or records

Share confidential information only on a need-to-know basis, and always through secure, approved systems. Report phishing attempts, leaks or suspicious activity right away.

Protecting information protects St1 Biokraft, our people, and the work we do together.

Protecting Personal Data and Privacy

At St1 Biokraft, respecting privacy is about safety, ethics and trust. Colleagues, applicants and partners count on us to keep their personal data safe, with care and integrity. We handle all personal data in line with the EU General Data Protection Regulation (GDPR), national privacy laws, and our own high standards.

Key principles we follow in practice:

- Collect only the data we need and use it only for specific, lawful purposes
- Keep data secure in approved systems, with access limited to authorized people
- Respect privacy rights by being clear on how data is used and supporting the right to access, correct or delete it

If you work with personal data:

- Use only approved tools and notices when handling personal data, and collect consent where required
- Never share personal data unless there is a clear business need and safeguards are in place
- Report any suspected data breach immediately to IT Security, HR or Legal. A quick action matters.

Our Data Protection Policy explains how to handle personal or employee data. If you are unsure what counts as personal data or how to handle it, ask before you act.

Protecting personal data protects people, and that is a responsibility we all share.

Data Security

We rely on digital tools and systems every day, and protecting them is everyone's responsibility. Data security is part of working safely and being the Expert.

St1 Biokraft complies with all cybersecurity laws, including the EU's NIS2 Directive on risk management, incident reporting and system resilience.

What this means in practice:

- Use only approved systems for storing or sending company data
- Never share passwords or leave devices unattended
- Stay alert to phishing, malware or suspicious emails and report issues to IT immediately
- Keep up to date with cybersecurity training. It helps protect both company and personal data

One weak link can expose systems, cause downtime or damage trust. When in doubt, stop and ask. Staying secure is part of staying safe.

IT and Communication Systems

St1 Biokraft's systems like email, internet, networks, software and devices are provided to support our business. Use them responsibly and for work purposes. Occasional personal use is fine if it is appropriate and does not affect work or security.

The following are not allowed:

- Downloading unauthorized software or applications
- Sending or forwarding offensive or inappropriate content
- Using company systems or accounts for personal business, side jobs or financial gain

Where permitted by law, system monitoring may be used to protect operations and comply with cybersecurity obligations under NIS2 and other regulations. Misuse can lead to disciplinary action or legal consequences.

Use our systems with the same care and professionalism you bring to your work. If you are unsure what is allowed, ask first.

How we use our systems also shapes how we communicate. Every message, post or interaction reflects on how people see St1 Biokraft's brand.

Communicating with Purpose: Our Reputation and Brand

Our brand is built on trust. Every employee is an ambassador of St1 Biokraft. How we speak and act, online or offline, matters. Clear and respectful communication builds trust with colleagues, partners and the public.

What this means in practice:

- Be professional in public and online. If unsure, don't post it.

- Use social media wisely. Never share trade secrets, sensitive data or behind-the-scenes content without permission. Always get consent before posting photos or videos of colleagues.
- Keep business on business platforms. Do not use private messaging apps for work.
- Refer media inquiries to our Head of Communications.
- Never misuse your role for personal, political or commercial gain.

We train and support spokespersons and leaders to represent St1 Biokraft in line with our Cornerstones and legal duties. Our Head of Communications leads our external voice, working closely with subject matter experts and senior leaders.

When in doubt, Be Open and Be Collaborative: ask first, protect our shared reputation.

Acting with Integrity and Compliance

Legal and Regulatory Compliance

At St1 Biokraft, doing the right thing is how we build trust, stay safe and succeed together. We are committed to full compliance with the laws and regulations of every country where we operate. Everyone representing St1 Biokraft is expected to understand and follow the legal obligations and company policies relevant to their work. This includes contracts, regulatory requirements and voluntary commitments we have made.

Compliance protects our people, safe operations and the trust of our customers and communities.

What this means in practice:

- Know the laws and rules that apply to your role and ask for help if unsure.
- Follow company policies, procedures and commitments
- Speak up early if something feels wrong

We work across borders and under many legal frameworks, and we hold ourselves to a high standard. The following areas apply to our business operations and are covered in detail in our set of policies.

Anti-Corruption, Gifts and Hospitality

At St1 Biokraft, we build trust not only through innovation and expertise but also by how we behave. Corruption in any form is against the law and breaks that trust. We prohibit all forms of corruption, bribery, and undue influence. This includes bribes, kickbacks, facilitation payments, and improper payments through third parties.

We expect everyone who works for or represents St1 Biokraft to act with honesty and transparency in every transaction.

What this means in practice:

- Record all payments, gifts and expenses honestly and accurately.
- Check our Anti-Corruption Policy before offering gifts, donations, or hospitality.
- Stay alert. Speak up if you see or suspect corruption or unethical practices, even from a third party.
- Complete your mandatory anti-corruption training. It is part of protecting our business and each other.

We hold a zero-tolerance approach to corruption. Our integrity, like our safety, is non-negotiable.

One of the most common risks is gifts and hospitality. Partnerships at St1 Biokraft are built on trust, not favours. Even small or well-meant offers can create problems or be misinterpreted.

We only allow gifts or hospitality when they are occasional, modest, transparent, and tied to a clear business purpose, and we do not expect gifts in return. Cash, gift cards, expensive travel, or offers during contract negotiations are never acceptable.

We apply extra caution with public officials: apart from low-value, branded items, we avoid gifts or entertainment entirely, and never during ongoing permit or other regulatory proceedings.

When in doubt, check our Anti-Corruption Policy and Guidelines or ask before you act. Taking a moment to check protects both you and St1 Biokraft. Acting in line with our Cornerstones Be Collaborative, Be the Expert, and Be Open means protecting our reputation and relationships.

Complying with Trade Compliance and Sanctions

Doing business globally helps us grow and deliver impact, but it also brings strict duties. Trade compliance protects St1 Biokraft's license to operate, reduces risk, and prevents harm to people, customers and communities. We follow international trade laws, sanctions and export control rules in every market where we operate.

What this means in practice:

- Screen partners, suppliers and customers against sanctions and embargo (UN, EU, UK, U.S. OFAC).
- Follow import/export rules. Make sure goods, technology or services have the right licenses and documentation.
- Watch for red flags like vague end-users, unusual payments or inconsistent delivery instructions, and speak up if something feels suspicious.
- Stay trained. St1 Biokraft provides trade compliance training accessible to all employees. If your role includes onboarding new counterparties or handling transactions you are expected to participate and ensure your knowledge stays current.

Our Trade Compliance Policy and Guidelines detail process steps for screening, recordkeeping and escalation, including red flag indicators. If you are ever unsure, don't guess – ask your manager or Legal. Doing business the right way means doing it responsibly, everywhere we operate.

Competing Fairly and Lawfully

We win business by competing honestly, not by cutting corners. Fair competition drives innovation and builds trust with customers, partners and society.

What this means in practice:

- We don't fix prices, rig bids or divide markets or customers.
- We don't misuse market power.
- We don't exchange sensitive information with competitors and use only legal sources, like public reports or customer feedback for market intelligence.

If your role involves dealing with competitors, industry groups, or joint ventures, always check our Competition Law Compliance Policy or consult your manager or Legal before acting.

Competition law training is required for employees in high-risk roles such as value chain, procurement and strategy.

Fair competition protects our integrity and fuels long-term success.

Conflicts of Interest and Transparency

We are committed to maintaining transparency and integrity in all business decisions. A conflict of interest arises when personal interests interfere—or appear to interfere—with the interests of the company.

What it means in practice:

- Speak up early if you believe a situation could present a conflict of interest. Raise potential conflicts with your manager or Legal as soon as possible. Early disclosure helps protect both you and the organization from reputational, legal, or operational risks.
- Keep decisions based on what's best for St1 Biokraft, not on personal connections.

Outside Activities

We all live lives beyond our work. But if those activities clash with St1 Biokraft's interests, they can put our integrity at risk. Always check and get approval before committing to:

- External board memberships
- Outside employment, freelance work or consulting
- Investments in competitors, suppliers or customers
- Family ties or investments that overlap with St1 Biokraft's business

Written approval protects both you and the company. Senior or sensitive roles may also face stricter rules and disclosure requirements.

Personal Relationships

Relationships at work happen. What matters is managing them fairly. Disclose any close relationship with colleagues, customers or suppliers that could affect business decisions. Safeguards will be put in place to protect objectivity and avoid power imbalances, such as between a manager and a direct report.

Responsible Partnerships

Suppliers and Third Parties

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

That means following the laws of every country of operation and embracing the principles in our Code of Conduct and Business Partner Code of Conduct. These are our minimum standards, and we encourage partners to aim higher.

Business Partner Code of Conduct

Our Business Partner Code of Conduct sets clear expectations for responsible and ethical collaboration. It covers:

- Anti-corruption and fair competition
- Health, safety and working conditions
- Environmental responsibility
- Traceability and legal sourcing

Non-compliance may lead to corrective actions or, in serious cases, termination. Everyone who works with partners must make sure that these standards are built into contracts.

ESG Due Diligence

We use a risk-based approach when selecting and reviewing partners. Our evaluation tools include:

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

We consider country risks, the type of service and reputation. Where risks are identified, partners must show clear mitigation plans before moving forward. Our evaluation procedure of business partners supports this process.

Responsible Sourcing

We are committed to sourcing responsibly across our supply chains. This means acting with integrity, transparency and environmental care.

Key expectations include:

- Compliance with all relevant regulations
- Ensure traceability and clear documentation across our value chain
- Meet our standards for ethical and sustainable practices

We expect our business partners to:

- Cooperate with audits and provide requested documentation

- Report incidents or disruptions promptly
- Notify us of changes in sourcing regions or subcontractors

Sourcing responsibly is part of Safety First and supports the EU Taxonomy for sustainable activities, helping us deliver on broader ESG goals.

Living the Code

Speaking Up

At St1 Biokraft, openness is the foundation of a safe and responsible workplace. If you see something unsafe, unethical or against this Code, speak up. Raising your voice protects our people, our company and our reputation.

You can report:

- Suspected violations of this Code or any St1 Biokraft policy
- Unsafe behaviour, health risks or environmental hazards
- Fraud, harassment, discrimination, corruption or unethical conduct

How to speak up:

- Talk to your manager or HR
- Contact Legal / Compliance
- Use our confidential whistleblower channel [Whistleblower | St1 Biokraft](#)

All reports are taken seriously and handled fairly and confidentially. Retaliation against anyone who raises a concern in good faith will not be tolerated. Our Whistleblowing Policy sets out the full process and protections for both reporters and those being reported.

Training and Support

The Code is something we live by every day. To make sure everyone knows how to apply it:

- We provide Code of Conduct training when you join St1 Biokraft, with regular refreshers after.
- Those who work in a higher-risk roles, like sales, procurement, business development or management, will get extra training tailored to their job.

Managers have a key role in showing we do it right: lead by example and bring the Code into daily team decisions.

If concerns arise, we first support and correct. If expectations are ignored, consequences may follow, from extra training to disciplinary action, and in serious cases, termination or reporting to authorities.

Governance and Oversight

The Code is owned by the CEO and managed by Legal / Compliance.

It is reviewed annually to reflect new risks, laws and stakeholder expectations.

If you have questions or concerns, talk to your manager, HR or Legal / Compliance. You can find supporting policies, guidelines and tools on the St1 Biokraft intranet.

This Code is here to guide good decisions, not to overwhelm you with rules.

Together with our Safety First mindset and our Cornerstones – Be Collaborative, Be the Expert, Be Commercial, Be Open, – it is a shared commitment to doing what is right.

This Code of Conduct was last approved on the 27th of November 2025 by the board of St1Biokraft AB.

St1 Biokraft AB, Board of Directors