Human Rights Policy

St1 Biokraft is a purpose-driven company focused on enabling a sustainable society and driving the green transition. As we grow and operate across diverse markets and partnerships, we recognize that respect for human rights is a core part of how we build trust, deliver impact and live up to our values covering the whole biogas value chain, from feedstock sourcing to distribution and end user sales. This Human Rights Policy (the “Policy”) sets out the principles and expectations that guide our actions across our operations, value chain and stakeholder relationships and in all jurisdictions where St1 Biokraft operates.

Purpose and Commitment

At St1 Biokraft, respect for human rights begins with safety and extends to dignity, fairness and freedom from harm. We are committed to working with integrity, care, and respect for all people in our operations and across our entire value chain. This commitment guides how we conduct our business every day.

Our approach is based on internationally recognised standards, including the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, and the International Labour Organization’s (ILO’s) Declaration on Fundamental Principles and Rights at Work.

This commitment applies equally to our own employees, to the contractors and business partners we work with, and to the communities we impact. It is anchored in our governance framework, including our Code of Conduct and our Business Partner Code of Conduct.

Scope

This Policy applies to all St1 Biokraft employees (permanent, temporary and interns), as well as to contractors, consultants, suppliers, other business partners, and affiliates in every country where we operate.

We pay special attention to the needs of vulnerable groups, such as women, migrants, minorities, indigenous peoples and children, who may face higher risks of negative human rights impacts.

Our Human Rights Principles

We uphold the following principles across our operations and value chain.

Respect, Inclusion and Equal Opportunity

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 hare, including based on race, gender, sexual orientation, gender identity or expression, religion, background, citizenship, disability, age, or any other trait protected by law.

Fair Wages and Working Hours

We ensure that all employees in our operations and value chain receive fair wages, at least in line with national minimum standards. We follow all applicable laws on pay, working hours, holidays and social security.

Freedom of Association and Collective Bargaining

We respect every employee's right to join or form trade unions and to engage in collective bargaining without fear of intimidation or retaliation. Where legal frameworks are weak, we work to improve dialogue and fair labour relations.

Health and Safety

Safety First is the foundation of how we respect human rights. We provide a safe, healthy and secure workplace for all employees and contractors. This includes preventing substance abuse and promoting physical and mental wellbeing.

We also share safety knowledge and training with suppliers and partners, helping to raise standards across our value chain. All our products and services must meet strict safety requirements, and we monitor compliance closely.

Forced Labour and Modern Slavery

Everyone has the right to work freely. We prohibit all forms of forced labour, bonded labour, and modern slavery. This means no one may be forced to work under threat, intimidation or penalty. Withholding wages, contract deception, confinement or coercive/unlawful overtime are not allowed. Partners may not charge recruitment fees, withhold passports, create false debts or restrict an employee's freedom to leave.

Contracts must be lawful, clear and written in a language employees understand. They must confirm that work is voluntary and that employees have the right to resign according to legal requirements.

This Policy does not restrict lawful overtime that is permitted and compensated under national labour laws or collective agreements.

Child Labour

We strictly prohibit child labour. No employee under 15 (or higher if national law requires) may be employed in our operations or value chain. We protect children's right to education, development and health, and do not allow hazardous or harmful work for anyone under 18.

We require all partners and suppliers to follow ILO standards and national laws on child labour. We assess risks in high-risk regions and work with stakeholders to prevent and address violations.

Right to Privacy and Data Protection

At St1 Biokraft, respecting personal data is part of respecting people. We handle personal data lawfully and fairly, in line with the GDPR, the European Data Protection Board and local laws.

Data must only be collected for legitimate purposes, kept secure and accessed only when necessary. It must not be stored longer than needed. Misuse of data or systems is not tolerated and may lead to disciplinary or contractual consequences.

We also assess risks from new technologies such as surveillance or automated decision-making to ensure fairness, inclusion, and trust.

Anti-Corruption and Ethical Conduct

We do not tolerate corruption in any form. This includes offering, accepting or soliciting bribes or kickbacks. We promote ethical conduct in our own operations and expect the same from partners and suppliers.

Positive Societal Impact

At St1 Biokraft, we recognise that our operations can impact communities directly and indirectly. We aim not only to avoid harm but also to create opportunities, for example, by supporting fair employment, local development and social progress. Where minorities or vulnerable communities are affected, they are engaged in our assessments, and their rights are given special attention.

Due Diligence Process

We use a structured due diligence process to identify, prevent and address human rights risks. This includes:

- Regular assessments of risks in our operations and value chain.
- Action plans to prevent and mitigate risks, especially in high-risk sectors or countries.
- Monitoring through audits and supplier reviews.
- Corrective actions and remediation when harm occurs.

Our process aligns with the ESRS S1, standard, the EU Forced Labour Regulation, and relevant national human rights due diligence laws.

Grievance and Remedy Mechanisms

We provide accessible and transparent channels for raising concerns. Employees, contractors, suppliers and community members can report issues confidentially and, where permitted, anonymously.

We acknowledge receipt of reports within seven days, investigate them fairly and provide feedback and possible remedies within 90 days. All corrective actions are tracked and monitored.

This mechanism is linked to our Whistleblowing Policy.

Training and Awareness

All employees receive human rights training during onboarding and through refreshers. Managers and functions, involved in high-risk matters, such as HR and Legal, receive tailored training. We work to build awareness and shared responsibility across our business.

Governance, Monitoring and Oversight

We monitor compliance through KPIs, audits and annual reporting to the Board. Lessons learned are used to strengthen our practices and prevent risks.

This Policy is jointly owned by HR, the Head of Sustainability and the Head of Legal jointly and is overseen by the Board.

This Policy will be reviewed annually, or sooner if required by legal or regulatory changes.

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This Human Rights Policy was last approved on the 27th of November 2025 by the board of St1Biokraft AB.

St1 Biokraft AB, Board of Directors