Anti-Corruption Policy

At St1 Biokraft, the way we do business is as important as the results we achieve. Integrity is part of how we work and how we grow. Our Safety First mindset and culture cornerstones – Be Collaborative, Be the Expert, Be Commercial, Be Open, – mean we never compromise when it comes to fairness and transparency. This approach is even more important as we operate in a cross-border environment where decisions and supply chains stretch across multiple markets. Every step, from sourcing biomass to delivering energy, relies on the trust of our colleagues, partners and communities. Therefore, we are committed to driving the green transition with integrity, safety and transparency, in every market where we operate.

Purpose and Commitment

St1 Biokraft acts in compliance with applicable laws and believes in conducting business in an ethical way to promote healthy business relations, and we expect the same from all our business partners. We are committed to maintain high ethical standards and to ensure that goods and services purchased are produced under sustainable and responsible conditions across our value chain. We take a zero-tolerance approach to all forms of bribery, corruption, facilitation payments and improper influence, regardless of local customs or practices.

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Corruption, in any form, is illegal. It undermines trust, safety and integrity in our mission, our culture, our operations, our partnerships, and the communities we serve. It distorts markets, damages the environment for fair competition and erodes the public's belief in sustainable solutions.

That is why we take a clear and consistent stand: we prohibit all forms of bribery, corruption and undue influence, no matter how small or well-intended they may seem,

Scope and Applicability

We view anti-corruption as a core element of our compliance and ESG framework, supporting responsible supply chains, and we ensure strict compliance with applicable requirements in every jurisdiction where we operate.

This Policy sets out our principles, roles and clear expectations for how we prevent and respond to corruption risks, so that St1 Biokraft's success is built on transparency, fairness, and a shared commitment to doing what's right. Detailed obligations, legal risks and operational procedures are outlined in the Anti-Corruption Guidelines.

This Policy applies to:

- St1 Biokraft AB and all its group entities, joint ventures and operations worldwide.

- Our board members, employees, contractors, consultants, agents, intermediaries, and any person or entity acting on our behalf or under our control.

St1 Biokraft's requirements on our business partners are set out in St1 Biokraft's Business Partner Code of Conduct.

Prohibited Conduct

At St1 Biokraft, we never, directly or indirectly, engage in conduct that violates anti-corruption laws or our principles and culture. Prohibited activities include:

- Offering, promising, giving, requesting or accepting anything of value to improperly influence a decision, secure an undue advantage, or benefit public officials or private individuals in order to gain business.
- Providing, authorising, accepting or allowing facilitation payments (small unofficial payments made to secure or speed up a routine process), even if they are locally permitted.
- Falsifying accounts, records or other documentation.
- Engaging in trading in influence by using a third party to improperly sway another person's decisions.

Third-Party and Supply Chain Integrity

We select and retain business partners based on merit, capability and shared values, and we expect them to meet our standards under the Business Partner Code of Conduct.

We recognise that third parties acting on our behalf represent a potential risk. Business partners should only be engaged for legitimate business purposes and on the basis of normal commercial terms and conditions. The remuneration should be in proportion to the service performed and be commercially acceptable.

We require:

- Risk-based due diligence before entering into or renewing agreements, focusing on ownership, ESG and jurisdictional corruption risks.
- Written contracts with anti-corruption clauses and audit rights.
- Ongoing monitoring of performance, expenses and behaviour.
- Right to terminate relationships where breaches occur.

This applies all business partners in our value chain.

Political, Social and Community Engagement

We do not make political donations. Lobbying or public affairs activities must be transparent, authorised and compliant with applicable law.

Social projects, donations and grants must:

- Be awarded based on objective criteria.
- Not disproportionately benefit a decision-maker.
- Be documented and aligned with our ESG objectives.

Speaking Up

We encourage anyone at St1 Biokraft, as well as our partners, to raise concerns about potential corruption or breaches of this Policy. Concerns can be reported through:

- Your line manager
- Legal / Compliance

Our confidential Whistleblower channel Whistleblower | St1 Biokraft

We strictly prohibit retaliation against anyone who raises a concern in good faith.

The detailed process for reporting, investigation, and protection of reporters is set out in our Whistleblower Policy.

Violations of this Policy or the Whistleblower Policy may result in disciplinary action, up to and including termination of employment, and where required, reporting to authorities. For business partners, non-compliance may result in suspension or termination of contracts.

Training, Governance and Oversight

We ensure that all employees and relevant third parties are aware of and comply with this Policy. Training is delivered on a risk-based basis:

- Baseline awareness is provided to all employees.
- Detailed training is provided to high-risk roles such as procurement, commercial, management and value chain.

We take individual responsibility seriously: everyone representing St1 Biokraft is expected to understand the Policy, know the risks in their role and follow our Code of Conduct, this Policy and accompanying Anti-Corruption Guidelines.

This Policy is owned by Head of Legal and reviewed at least annually, or sooner if required by legal or regulatory changes.

Anonymised case statistics and key performance indicators are reported annually to the Board as part of oversight.

All records are managed in line with St1 Biokraft's cross-border recordkeeping standards and relevant local laws.

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This Anti-Corruption Policy was last approved on the 27th of November 2025 by the board of St1Biokraft AB.

St1 Biokraft AB, Board of Directors