

STARK GROUP POLICIES

HUMAN RIGHTS POLICY

Version 2.0 – July 2023



Introduction

We are committed to respecting fundamental human and labour rights throughout our activities across our value chain. Our commitment is based on core ILO conventions and internationally accepted frameworks from the OECD and the United Nations including the UN guiding principles on business and human rights, as well as compliance with applicable local legislation where we operate.

We are committed to address negative impacts related to our business operations. We wish to play an instrumental role in upholding human rights across our value chains and promoting positive change within the communities around us. We aim to be the preferred partner for construction and a positive link in the sustainable construction industry value chain by meeting the expectations outlined in the UN Guiding Principles on Business and Human Rights by identifying and putting in place measures to address our salient human rights impacts.

STARK Group is a signatory to the United Nations Global Compact and thereby supports the ten principles of the UN Global Compact including principles 1 and 2 regarding the support, respect and protection of internationally proclaimed human rights and that we ensure we are not complicit in human rights abuses.

Scope

This policy is applicable to all STARK Group employees and affiliates.

All STARK Group employees are responsible for following these principles and integrating them in all activities and processes in order to live the STARK group values of decency, passion and pride.

STARK Group has implemented a Supplier Code of Conduct which explicitly states our expectations to suppliers and other partners to commit to respecting human rights.

Requirements

STARK Group Human Rights principles

1. We are committed to respecting human rights

We are committed to respecting fundamental human and labour rights within our own operations and through our collaboration with our value chain. Our human rights due diligence process aims at identifying and assessing our key salient human rights issues, integrating findings from impact assessments into relevant company processes, tracking the effectiveness of measures and processes, and communicating on how impacts are being addressed. Our due diligence process has a risk-based approach based on third party ESG ratings, country, industry and spend.

2. We comply with all applicable laws and human rights commitments

Our commitment is based on core ILO conventions and internationally accepted frameworks from the OECD and the United Nations, including the UN Guiding Principles on business and human rights, as well as compliance with applicable local legislation where we operate.

3. We expect our suppliers to be committed to respecting human rights

We expect our suppliers to adhere to all applicable laws and be committed to respecting human and labour rights and internationally accepted frameworks (core ILO conventions, OECD and UN Guiding principles on business and human rights) within their operations and supply chain.

Our supplier due diligence process is continuously updated with the aim to identify, mitigate, prevent and account for adverse human rights impacts caused by or contributed to through our operations.

4. We are committed to provide remediation

We are committed to provide appropriate remediation to harmed individuals or communities where we have identified that we have caused or contributed to a negative impact. We expect our suppliers to have the same commitment.

We are prepared to collaborate with suppliers to remedy adverse impacts which are linked to our products or services through our suppliers' own mechanisms or through collaborating on the development of third party non-judicial remedies. Furthermore, we will not obstruct access to other remedies, and we are committed to collaborate in initiatives that provide access to remedy.

5. We expect our business partners to respect human rights within their scope

STARK Group expects its business partners to respect human rights within their scope and take measures to promote responsible practices throughout the value chain.

Key human rights across our value chain

STARK Group is committed to uphold as a minimum:



The right to health, safety and wellbeing

Health and safety is always a key priority for STARK Group, whether it involves our employees, customers or the communities in which our businesses operate. We aim for an accident-free workplace, and all our employees must support continuous improvements in health, safety and well-being throughout our operations.



Non-discrimination and equality

STARK Group works to ensure equal treatment and opportunities for all employees and to advance diversity, equity and inclusion. STARK Group supports freedom of expression and does not discriminate on gender, transgender identity or other expressions, age, culture, nationality, ethnicity, physical abilities, disabilities, hidden disabilities, political and religious beliefs, sexual orientation, or other factors.



The right to form or join a trade union and to bargain collectively

STARK Group is committed to the freedom of association and the right to collective bargaining.



Fair compensation and wages

STARK Group pays fair wages based on market levels, performance and, where relevant, collective bargaining agreements. We expect the same of our suppliers as outlined in our Supplier Code of Conduct.



The right not to be subject to harassment

STARK Group have zero tolerance towards bullying, harassment and discrimination and are committed to creating an inclusive culture free from these behaviours.



Data privacy

The right to privacy, including the security of personal data is a priority for STARK Group whether it involves our employees, customers or other stakeholders.



The right not to be subject to forced, compulsory or child labour

STARK Group do not tolerant any form of forced labour including compulsory labour, child labour, unreasonable working hours and human trafficking.

Roles & responsibilities

Roles & responsibilities

Accountable

Policy approval

ExCom

Policy Owner

CHRO

Deviations

All deviations must be approved by the policy owner. Such requests must be made in writing to the policy owner. In the event of any discrepancies between the English version of this policy and a translated version, the English version will be binding.



Whistle blower system

We encourage all stakeholders to speak up about any misconduct such as business crime or human rights violations. All information is kept strictly confidential, and all concerns can be raised without fear of retaliation: [STARK Group - Speak Up \(whistleblowernetwork.net\)](https://www.starkgroup.com/en/stark-group-speak-up).

Contact

For more information, please contact the local HR manager, Group Sustainability or Group HR.

Policy Revision History

Review cycle: Annually Q3

It may be amended at any time with the approval of ExCom.

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