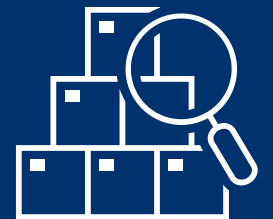




STARK GROUP POLICIES

PRODUCT INTEGRITY POLICY

Version 2.0 – July 2023



Introduction

STARK Group aims to be the preferred partner for construction and a positive link in the construction industry value chain.

As a professional builder's merchant, we want to supply reliable and robust products to our customers which do not compromise environmental and social standards.

STARK Group is a signatory to the United Nations Global Compact and is committed to supporting the ten principles.

To honour those commitments, we maintain appropriate and practical systems, processes and procedures in accordance with this and other Group policies and relevant legislation.

We are committed to address negative impacts related to our business operations throughout our value chain. We wish to play an instrumental role in upholding environmental and human rights standards across our value chains and promoting positive change within the communities around us.

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 and encouragements to suppliers and other partners to commit to respecting environmental and human rights.

Requirements

STARK Group Product Integrity Principles

1. We comply with national and international legislation in terms of product safety and quality

As an essential part of our obligation to bring safe and healthy products to the market we always comply with national and international product regulation. We have in place a framework that ensures that our products are always aligned with both national requirements and international legislation.

We maintain a regular dialogue with regulators and industry organisations to ensure we are always updated on regulatory requirements and their implementation.

2. We are committed to adhere to industry standards

As part of our commitment, we subscribe to industry standards in terms of quality and reliability. We stand behind the products we place on the market and if they in any way fail to perform as intended, we do our outmost to help our customers to mitigate any shortcomings.

3. We trade only with financially healthy suppliers who subscribe to our values

As part of our commitment to source safe products we only trade with suppliers who are financially healthy and who subscribe to our values in terms of supplying the market with safe and healthy products which contribute to helping our customers build safe and healthy homes. We have tools and guidelines to evaluate our suppliers' financial health and their ability to engage in long term relationships with us and our customers.

4. We assess and monitor supplier ESG performance

STARK Group uses external screenings to assess and monitor supplier ESG performance as a basis for prioritizing supplier engagement and improvement.

5. We are committed to take swift and immediate action to mitigate any risk

If a product turns out to not meet our quality requirements, we aim to take swift action to discontinue the sale of the product until we know where the failure originated and have reassurance it has been mitigated.

Further, we provide our sales and sourcing staff with training on relevant regulations and how to ensure the required quality and documentation from our suppliers.

Roles & responsibilities

Roles & responsibilities

Accountable

Policy approval

ExCom

Policy Owner

STARK Sourcing CEO

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/whistleblowernetwork.net).

Contact

For more information, please contact STARK Sourcing.

Policy Revision History

Review cycle: Annually Q3

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

Version 2.0 July 2023