



STARK GROUP POLICIES

SPEAK-UP! WHISTLEBLOWER POLICY

Version 3.0 – July 2023



Introduction

We want our company to be perceived as honest and trustworthy by our employees, customers, suppliers, business partners and society in general. The Code of Conduct is our way of doing good business responsibly. It builds on our culture and values and directs us to appropriate behavior. Combined with our values and common sense, the Code of Conduct provides the basis for all our behavior. To support our efforts to act ethically and responsibly STARK Group has created a whistleblower line called SpeakUp! to encourage employees and others to speak up about any conduct that is not in line with the STARK Group's values to safeguard our integrity.

Help us fight corruption and business crime or harassment. Every violation report is important and helps us to prevent economic losses, to protect people and to prevent damage to our reputation.

To speak up is a matter of trust and all who speak up in good faith can do so in confidence and without fear of retaliation. Our Speak Up! can be used by employees, customers, any 3rd Party, etc. who comes across violations. Whether the report is made anonymously or not, STARK Group reassures reporters raising such concern that they will be protected from reprisals or retaliation. Any form of threat, retaliation or discrimination towards a reporter will not be tolerated and will be treated as a disciplinary matter.

The purpose of this policy is to explain how you can raise concerns about suspected or potential misconduct, what you can report and how STARK Group manages reports received within the whistle blower process, how we protect the reporter and how we handle the cases reported.

Scope

This policy is applicable to all STARK Group employees, affiliates, customers and 3rd parties.

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 Code of Conduct which explicitly states our expectations to our employees and working ethics and all guidelines and procedures that we follow at STARK Group are based on this policy.

Requirements

STARK Group Whistleblower principles

1. What can you Speak Up! about:

Our Speak Up! system is a reporting channel which provides employees, customers, and others with a relation to our organization a safe, simple, and consistent way to raise concerns when regular channels of communication and escalation are unavailable, inappropriate, or compromised. You should raise all knowledge of and all good-faith suspicion about any misconduct or violation you may have.

2. We do not tolerate knowingly false accusations:

You must not misuse the Speak Up! system by making accusations or filing reports that you know are false. We will not tolerate knowingly false reports and such behavior may result in disciplinary measures being taken against you.

3. How do you Speak Up!:

If you are not comfortable about speaking to someone within your own business, you can use our Speak Up! system. Please go to:

<https://starkgroup.whistleblownetwork.net>

In some of our markets, a telephone hotline is also made available. Any reporting to this hotline will be added into our Speak Up! System, and handled in the same way as direct reports to the system.

Even if STARK Group provides this system for reporting, you can also report externally to authorities. Link to each operating country's external reporting authority is found at our Speak Up! website.

4. Review and investigation:

STARK Group uses a two-phase approach when handling reports of possible misconduct. First there is a preliminary review and inquiries: the purpose is to assess the concern and determine whether the matter requires further investigation and, in such case, by whom and in what form. Secondly there is the investigation where the purpose is to assess whether the concern regarding the reported misconduct is justified and whether any sanctions should and can be imposed on individuals.

The reporter will be informed that their concern has been received and when the investigation is concluded, if they have provided means to receive this information. The reporter will not be provided with any details of the outcome of the case (or any actions taken) for reasons of confidentiality, privacy and the legal rights of the Data Subject involved.

If you become involved in a Speak Up! investigation, whether as a reporter, a witness, or a Data Subject, you need to cooperate and answer all legitimate questions completely and honestly. All witnesses are bound by confidentiality and cannot disclose any information to others than the investigator of the case.

If any person in the review and investigation team is named as part of the reported concern, the person(s) will be excluded from the process and will not have access to any information.

If a misconduct has indeed taken place, appropriate measures will be taken where necessary and in accordance with relevant laws and company policies.

Requirements

STARK Group Whistleblower principles

5. Personal data protection:

STARK Group is obliged to inform the Data Subject that a concern has been raised against them, but the identity of the reporter of the concern or any witnesses will not be disclosed. Information to the Data Subject may be postponed until the review and investigation has come to a conclusion.

Personal Data collected during a Speak Up! review or investigation will only be used for the purposes explained in this policy. Documentation regarding reported concerns is stored according to applicable law within the Speak Up! System.

6. GDPR and governance reporting:

There is a deletion policy in place, covering the reports, data and actions stored in the Speak Up! System according to GDPR laws.

Any breach of the provisions of this Policy may be subject to disciplinary action, prosecution and/or civil liability.

All cases reported in the Speak Up! system are reported to Audit Committee by STARK Groups Head of Internal Controls and Risk. "Whistleblower overview" has an allocated timeslot in every scheduled Audit Committee meeting.

7. Legislation:

Our Whistleblower setup and policy is based on the EU-DIRECTIVE 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

Our approach to this area considers local legislation and law implemented in support of this EU based directive for our operating countries.

Key components or our Whistleblower policy



We welcome feedback

At STARK Group we want to ensure a culture where you can speak up and articulate your opinion about the way we work. Our leaders have an open-door policy, so you also have the option to raise concerns or questions directly to them.



Greater concerns

The relevant governance bodies in the respective companies, e.g., the Supervisory board, the Works Council, HR, Risk personnel and Legal departments are available for a personal, anonymous and confidential exchange of information. Such bodies will always ensure data protection, compliance and confidentiality.



Confidentiality and anonymity

All submissions to Speak Up! system are strictly confidential and if you wish, also completely anonymous. Regardless of whether you remain anonymous or provide your name in the reporting, we ask that you open a secure post box in the system. This makes it safer and easier for us to communicate with you for further inquiries as we may not be able to finalise the case without further information from you.



Monitoring of Whistleblower reporting

The Speak Up! system is monitored all year round by STARK Groups Head of Internal Controls and Risk and STARK Groups CHRO. STARK Group takes all reports of possible misconduct seriously and each report is investigated in accordance with STARK Group values.



Examples of what the Speak Up! Channel can be used to report:

Fraud, extortion, bribery, embezzlement, theft, violations of competition laws and rules, inadequate financial or non-financial record keeping, conflicts of interest, improper use of company resources, disclosure of confidential information, non-compliance with trade sanction laws, violation of data protection and privacy laws, harassment and similar.

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.

Contact

For more information, please contact the Policy Owner.

Policy Revision History

Review cycle: Annually Q3

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

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