



HEALTH AND SAFETY POLICY

STARK Group HSEQ

Version 2.0
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STARK GROUP – HEALTH AND SAFETY POLICY

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1. INTRODUCTION

Health and safety are a key priority for STARK Group, whether it involves our employees, customers or the communities in which our companies operate. The aim is to create a safe and accident-free workplace and we are committed to continuous improvement in health and safety performance throughout our operations.

To pursue this aim, all leaders and employees are expected to act in accordance with the STARK Group Safety rules and in conjunction with applicable local and international laws and regulations at all times. To ensure full compliance with legislation and Group policies a comprehensive system will be maintained, and relevant information will be communicated as needed.

This policy will provide leaders and employees with an understanding of Health and Safety compliance and will help identify dangerous situations, problem areas and behavior that must be avoided. Leaders and employees will also receive guidance on where to seek instruction or further advice if work is being carried out illegally or irresponsibly. The BU's Intranet contains more detailed instructions and guidelines for how to comply with STARK Group safety rules.

2. DEFINITIONS

STARK Group	STARK Group A/S and all affiliates
HSEQ Team	Group Health, Safety, Environmental and Quality Team and the German EHS Team
Group CHRO	Chief Human resource Officer
BU	Business Unit
Third-party	Customers, suppliers and other relevant parties with no intra-group relation to STARK Group

3. OBJECTIVE AND SCOPE

STARK Group leaders and employees must comply with applicable laws, regulations and STARK Group policies.

Failure to comply with this policy can result in the following:

- Personal injuries
- Materiel damage
- Insurance claims
- Financial loss due to sick leave
- Impact on remaining employees/branch if colleagues get injured/ are on sick leave
- Fines from the Working Environment Authority

The purpose of this Health and Safety Policy and associated instructions and guidelines is to:

- Raise awareness and promote compliance and correct behaviour by ensuring that STARK Group leaders and employees know and understand the essence and purpose of Working Environment Legislations and STARK Group safety rules.
- Avoid fines, actions, damage and other risks associated with Working Environment Legislations.
- Identify and risk assess situations where alternative actions may be needed and ensure compliance with Working Environment Legislations.

By complying with this policy, STARK Group can maintain a health and safety environment and be considered a safe and responsible workplace for both customers, employees and third parties visiting the branches.

All businesses within STARK Group must ensure compliance with relevant laws and regulations of the countries where they operate.

4. HEALTH AND SAFETY IN STARK GROUP

STARK Group operates after STARK Group Safety rules and follow the Working Environment Legislations of all the different countries where STARK Group is situated. In doing so helps ensure the health, safety and welfare of all STARK Group employees.

Failure to comply with these rules and legislation can jeopardize STARK Group's most important assets – our employees.

The main areas regarding the Working Environment Legislation and STARK Group rules are work performance, workplace design, technical equipment, hazardous substances and materials and formal requirements.

In short, the areas consist of the following:

Work performance

Work shall be planned, organised and carried out in such a way as to ensure health and safety.

Workplace design

The work site shall be in such a condition that it is safe and healthy.

Technical equipment

Machines, machine parts, containers, prefabricated constructions, appliances, tools and building components, other technical equipment and personal protective equipment shall be designed and used in such a way that they are safe and without risks to health.

Hazardous substances and materials

Substances and materials with properties which may be dangerous, or which may otherwise compromise health or safety may only be manufactured and used in work processes and methods which effectively secure employees against accidents and illness.

Formal requirements

- 52% of the branches in STARK Group have the working environment certificate ISO 45001 issued. It applies for 2 Danish branches and 220 German branches.
- The Working Environment Committee shall participate in the organisation and performance of all working environment work by providing consultancy.
- In certain situations, certificates or documentation of education are needed before performing work that may cause a significant risk of accidents or illness.

5. KEY PRINCIPLES

All STARK Group leaders and employees must know and understand the key principles outlined below. For further explanation, see STARK Group's health and safety instructions and guidelines.

Overall, it is important to know that we don't tolerate work being carried out illegally, irresponsibly or in any way jeopardize the safety and health of our employees and customers. If such situations occur leaders and employees must clearly state that they cannot interact or participate in the matter and inform their nearest leader.

In order to help STARK Group leaders and employees the HESQ Team is committed to:

- Develop, implement and monitor health and safety procedures appropriate to our business activities.
- Identify the hazards and risks associated with our activities and put in place appropriate control measures to prevent injuries and ill health to our employees, customers and other third parties.
- Establish channels of communication which encourage employees to contribute improvements in our health and safety performance.
- Provide appropriate resources to ensure that this policy may be brought into effect and maintained.
- Ensure work-related incidents and near misses are investigated and analysed to prevent recurrence.
- Set annual objectives and targets to improve our performance.
- Monitor and review health and safety performance and action plans on a regular basis.
- Provide sufficient information, advice, training and supervision to ensure that people under our control are fully aware of their responsibilities and are competent to undertake their activities.
- Periodically monitor internal audits performance and compliance of our adherence to this policy

STARK Group leaders and employees have a duty to comply with the key principles and must agree to:

- Taking reasonable care for their own health and safety and that of others who may be affected by their actions.
- Co-operating fully to ensure compliance with this policy and procedures introduced to fulfil our obligations.
- Co-operating with us in maintaining high standards of health and safety.
- Maintaining their place of work and their equipment in a tidy and safe condition.
- Making proper use of equipment provided in the interest of health and safety.
- Identify hazards and conduct risk assessments when needed.
- Reading relevant issued information from the HSEQ Team and complete assigned courses on the internal E-learning platform.
- Always ensure that work-related incidents and near misses are reported, investigated and analysed to prevent recurrence.
- Always involve the Health & Safety Team if any questions arise about Working Environment legislation or STARK Group safety rules.

6. ROLES AND RESPONSIBILITIES

Whilst STARK Group CEO is ultimately accountable for Health and Safety in STARK Group, the Group CHRO is responsible for the development of this Health and Safety Policy and the underlying Manuals and Guidelines/Handbooks. This includes ensuring that the Health and Safety Policy, Manuals and associated documents are kept up to date, and monitoring and addressing risks.

Group CHRO is responsible to ensure that all companies within STARK Group know and understand this Policy and the Manuals and Guidelines/Handbooks.

The business unit HR Directors are responsible to ensure that the relevant employees know and understand this Policy and the Manuals and Guidelines/Handbooks, and that it is fully implemented and adhered to. The same goes for the BU subsidiaries.

Employees who are part of a Health and Safety committee will be trained in Working Environment legislation and how to comply with it.

Policy governance area	Accountable/Responsible
Policy owner	Group CHRO
Application – Users of policy	HR directors
Accountable for compliance with policy	Group CEO and BU CEO
Policy review	Group CHRO
Policy approval	ExCom

Review cycle: Annual

7. CONTROL FRAMEWORK

Controls are in place to ensure compliance with this policy and includes HSEQ internal audits, ongoing follow-up branch visits and online E-learning courses.

On STARK Group level, annual risk assessments are reviewed, and any additional branch actions, controls and instructions will be communicated.

8. COMMUNICATION AND TRAINING

An overview of applicable instructions, alerts, themes and forms are to be found on the Intranet and must be read and used by leaders and employees. These are developed based on risk assessments, reported accidents, dissemination of legislation, our STARK Group HSEQ standards and include the following areas:

- Work in the warehouse
- Use of vehicle and machinery
- General topics (ex. electricity and fire)
- Trucks

HSEQ communications and training are available as E-Learning modules and courses, where you will find training which are both mandatory and voluntary depending on your job description.

An ongoing assistance and guidance from the HSEQ Business Partners and communication between the HSEQ Team and the Business Units is present in order to comply with the HSEQ policy.

The countries who have national committees (Denmark & Finland) will communicate through annual meetings and inform the rest of the business units using Intranet and word of mouth.

9. ASSOCIATED INSTRUCTIONS AND GUIDELINES

Please always check the intranet for a current overview of manuals and handbooks.

10. DEVIATIONS FROM AND AMENDMENTS TO THIS POLICY

All deviations must be made in writing and approved by the policy owner. All amendments must be approved by ExCom.

11. POLICY REVISION HISTORY

Version	Publication date	Description of revision
1.0		Policy
2.0	March 2020	Review and update

12. CONTACT

For more information, contact the HSEQ Team.

OUR VALUES



DECENCY

We act with decency towards customers, colleagues, and partners

In everything we do, we aim to earn trust. Trust requires integrity, and integrity requires decency. As a market leader, the success of our customers is always at the forefront of our daily activities. It is only by being fully committed to our dealings with customers, colleagues and partners, that we earn the right to be the most trusted builders' merchant.



PASSION

We care deeply about people and society

We are driven by people with a passion for our customers and our business. People who go out of their way to help build success for others and for society as a whole. With enquiring minds and easy smiles, we encourage each other to be better every day, and we celebrate our accomplishments together.



PRIDE

We take pride in delivering what we promise

We have come a long way since our beginning in 1896. Today, we are grateful to have earned our position as a market leader. We take pride in delivering on our promises to customers, colleagues and partners every day, and continue our efforts to remain trustworthy as we build our future and welcome new colleagues on board.

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

In all our Business Units, we also have an HR department and a Legal department so if it for any reason does not work to talk to your local management, HR and Legal are ready to listen.

If, for any reason, you are not comfortable speaking with someone within your own business, you can use our Speak Up system. Please go to <https://starkgroup.whistleblownetwork.net> or find the link on our homepage or download our Speak Up app to your smartphone.

The Speak Up system is monitored all year round by our Group HR and Group Legal and all information will be kept strictly confidential.