



STARK GROUP POLICIES

DIVERSITY, EQUITY & INCLUSION POLICY

Version 1.0 – July 2023



Introduction

STARK Group aspires towards a more diverse, equal, and inclusive company to become an even stronger market leader and player. As such diversity, equity, and inclusion (DE&I) are business critical and not a compliance necessity.

We believe that by ensuring a diverse and inclusive culture within STARK Group and supporting the group of companies, our Business Units – we help to build an even stronger company through a workforce as diverse as the tasks we cover every single day across borders and cultures. Also, this policy serves as a tool to identify situations where actions may be needed to ensure a safe and fair work environment.

This policy is built on the foundation of our three core values; decency, passion, and pride, but must be read in compliance with each country's relevant laws and regulations in which the values unfold.

Scope

In STARK Group we act with decency and value our people - therefore, we are committed, along with our leaders and employees on all levels, to comply with this policy.

This policy outlines the expectations from STARK Group to all employees when it comes to diversity and inclusion. This policy states what is expected from employees and what they can expect from leaders and management.

All guidelines and procedures that should be followed regarding diversity, equity, and inclusion at STARK Group are created from this policy document and the values outlined in the Code of Conduct and People Policy.

Requirements

At STARK Group we understand Diversity, Equity & Inclusion (DE&I) as:

1. Diversity

The representation and participation of groups of individuals with different social identity, such as gender, transgender identity or other expressions, age, culture, nationality, ethnicity, physical abilities, disabilities, political and religious beliefs, sexual orientation, and other attributes.

2. Inclusion

The process of involving, accepting, and valuing all people in the workplace regardless of their differences and social identity, that shows the rights and equal value of all people

3. Equity

Being fair and impartial in the way the needs of the employees are met and how opportunities are given to them in an objective matter that isn't affected by unconscious biases.

4. Belonging

Ensures that everyone feels safe. A sense of belonging involves more than simply being acquainted with other people. It is centered on gaining acceptance, attention, and support from members of a group.

As a company we require from ourselves that:

We value a diverse workforce that matches the population we serve and our client base. We do not discriminate on gender, transgender identity or other expressions, age, culture, nationality, ethnicity, physical abilities, disabilities, political and religious beliefs, sexual orientation, or other factors. The value of the equal opportunity is embedded in the way we do business and retain talent groupwide.

At STARK Group, we are convinced that our continued success relies on the diverse skills, experiences, and backgrounds that our employees bring to their roles. We believe that diversity and inclusion have a positive impact on our overall business results, our performance, our products, our relationships with customers and suppliers, and the environments where our employees thrive.

It is business critical that we succeed if we want to stay relevant to our customers, employees, investors, and society in the future and it is part of our values related to decency.

Our workforce reflects the increasing diversity of the greater community. Therefore, our efforts to understand, appreciate, and incorporate differences are becoming increasingly important.

Key DE&I Principles

STARK Group is committed to uphold as a minimum:



A diverse talent base

A diverse culture that's inviting, welcoming, and embracing multiple competencies viewpoints, and perspectives into our company. A culture that helps us to become more open and informed, take better decisions, and reflect the diversity of the societies we are part of.

We are committed to attract, develop, and retain people with different perspectives, experiences, and backgrounds to support us in our strategic journey. Our focus on DE&I is in this sense a necessary action for access to future, wider, and more diverse talent pools.

DE&I must be a natural element of any recruitment, hiring and selection activity in any STARK Group organization. Our approach to D&I must be visible, e.g., in all job adds posted, in our selection criteria, positions short listings, employer branding activities and when preparing the pipeline of talents and successors for key positions, in order to make this as balanced as possible.



Inclusive leadership and behaviour

An inclusive culture is about nurturing a sense of belonging in the workplace. When people belong, they are comfortable with expressing themselves openly, freely, and in their own voice and feel empowered to make a difference and act with passion.

STARK Group has zero-tolerance against any kind of bullying, harassment, and discrimination, and is committed to creating an inclusive culture, free from these behaviors.

It is therefore expected from both leaders and employees to demonstrate an inclusive attitude and behave in daily practices in such a way that builds and fosters an inclusive culture.

Furthermore, all our business units are required to have clear processes in place to follow, if we should have any employees who do not feel included or experience any episodes of bullying, harassment, or discrimination.

Key DE&I Principles

STARK Group is committed to uphold as a minimum:



Our DE&I approach

STARK Group applies a leader-led approach to attract more diverse applicants at all levels of our companies. We are committed to identify and eliminate potential barriers to ensure equality in advancement opportunities and foster an inclusive work environment, where diversity thrives in support of strategic ambitions and priorities.

As such, our priorities are reflected and integrated into our key people processes and approach:

- Recruitment, Hiring, and Selection
- Training & Development
- Succession
- Culture
- Leadership
- Rewards

To enforce, communicate, and share our inclusive culture and work environment, we will promote DE&I via our STARK Group Employer Brand and associated activities.

We monitor the outcome and progress of these initiatives annually through defined KPIs via an internal discussion amongst Group HR function leads and Business Units HR Directors. These KPIs will be revisited and adjusted once a year at the same time.



Equal opportunities

As a workplace, we ensure equal treatment for all employees. We take pride in belonging to a community that comprises different genders, ages, ethnicities, disabilities, sexual orientations, faiths, and religions.

We cannot afford to exclude any population in our search for the best talent for our business. By acknowledging and harvesting from different perspectives and experiences, we will gain a competitive advantage and leverage the effect of diversity for business growth. This requires a focus on equal opportunity throughout the organization.

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/whistleblowernetwork.net)

Communication & training

Please always check the intranet for an overview of manuals and guidelines regarding communication, training, and the annual wheel. Here you will find information on which leaders and employees who are obliged to participate in training, the way and the scope, and who is responsible.

Contact

For more information, please contact the local HR manager 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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