



STARK GROUP POLICIES

ANTI-CORRUPTION POLICY

Version 2.0 – July 2023



Introduction

STARK Group has a zero tolerance towards corruption, and we are committed to work against corruption in all its forms, including bribery and extortion. Our commitment is based on anti-corruption laws and international and regional legal frameworks, such as the UN Convention against Corruption including the UN guiding principles, as well as compliance with applicable local legislation where we operate.

We strive to promote a culture of transparency, honesty and integrity that fosters a safe and open work environment, and to address negative impacts related to our business operations. To pursue these values, all leaders and employees are expected to act in accordance with the STARK Group Code of Conduct.

Violating applicable anti-corruption laws potentially exposes Stark Group, its employees and any third-party intermediaries to significant criminal and civil liability, fines and penalties.

Corruption undermines stakeholders' legitimacy and trust. It is linked to misallocation of capital, environmental harm, human exploitation and unethical and illegal behaviour.

STARK Group is a signatory to the United Nations Global Compact and thereby supports the ten principles of the UN Global Compact including principle 10 regarding the commitment to work against corruption in all its forms including extortion and bribery.

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.

The policy is supported by detailed manuals.

STARK Group has implemented a Supplier Code of Conduct which explicitly states our expectations to suppliers and other partners to uphold similar principles and ethical standards and to commit to work against corruption.

Requirements

STARK Group anti-corruption principles

1. We are committed to work against corruption:

We have a zero tolerance towards corruption, and we are committed to fight corruption in all its forms by preventing, detecting and investigating all cases of suspected corruption, and remedying potential violations. Through behaviour and action Stark Group management promote a culture of openness, honesty and integrity, allowing employees to come forward with concerns. We ensure that employees understand and abide by this policy and how it relates to their work with STARK Group. We will respond to all incidents and report to local authorities when appropriate.

2. We comply with all applicable laws and anti-corruption commitments:

Our commitment is based on (but not limited to) The UN Convention against Corruption and internationally accepted frameworks from OECD including the UN Guiding Principles, as well as compliance with applicable local legislation where we operate.

3. We put commitment into action:

With our anti-corruption compliance programme we put our commitment into action. The programme consists of detailed procedures, communication, training and monitoring. The programme is designed to ensure we uphold the highest standards of professional integrity and can be an effective tool for preventing incidents of corruption and identifying misconduct. We continuously take necessary actions to improve the programme.

4. We expect our suppliers and other business partners to be committed to work against corruption:

We expect our suppliers and other business partners to be committed to work against corruption and to have ethical standards similar to ours. Suppliers and other business partners violating anti-corruption laws and regulations will be subject to termination of the business relationship as well as any other legal and remedial actions available under applicable law.

Key principles

STARK Group is committed to uphold:



Prohibition of corruption and bribery

Promising, offering or giving anything (directly or indirectly) in order to obtain an undue advantage is strictly prohibited. Also requesting, accepting or receiving anything in exchange for an undue advantage is strictly prohibited.

In STARK Group we do not give or accept personal payments or anything of value to or from a person or a company, including customers, suppliers and public servants, to obtain new business, retain existing business, or advance our interest improperly. We also do not use intermediaries to do, what we are not allowed to do.

The prohibition covers cash payments, benefits and favours. In certain circumstances, it also covers otherwise legitimate business expenditures such as gifts and entertainment.



Gifts, entertainment and hospitality

Gifts, entertainment and hospitality are legitimate opportunities to build healthy relationships. However we recognize the risk of creating an appearance of impropriety. For that reason we have detailed procedures for approval and registration. Gifts, entertainment and hospitality must be related to a clear business purpose and be transparent in the organisation.

Under no circumstances should gifts, entertainment or hospitality be given or accepted in return for promised actions, or create actual or perceived conflicts of interest.



Public sector – public officials

As a general rule, it is prohibited to offer anything to public officials or public companies.



Sponsorships and charity

STARK Group supports the community in which we operate. We provide corporate sponsorships and make charitable donations. Reasonable due diligence of recipients and procedures are followed to ensure that any such contribution does not constitute a violation of this policy.



Books and records

Extensive procedures for expenses must be followed including appropriate documentation before reimbursed. Secret, unrecorded or unreported transactions are prohibited.



Breaches or concerns

Employees who discover activities compromising our policies are obliged to immediately contact Group Legal or use our Whistle-blower system.

Roles & responsibilities

Roles and Responsibilities

Accountable

Policy approval

ExCom

Policy owner

Group General Counsel

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 local Legal department, Group General Counsel or Group Legal.

Policy Revision History

Review cycle: Annually Q3

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

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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 \(whistleblownetwork.net\)](https://www.starkgroup.com/whistleblownetwork.net).