



STARK GROUP POLICIES

PEOPLE POLICY

Version 2.0 – July 2023



Introduction

We are committed to respecting fundamental human and labour rights within our operations and through collaboration with our value chain. Our commitment is based on core ILO conventions and internationally accepted frameworks from OECD and the United Nations including the UN guiding principles on business and human rights, as well as compliance with applicable local legislation where we operate.

STARK Group is a signatory to the United Nations Global Compact and thereby supports the ten principles of the UN Global Compact including principles 1 to 6 regarding upholding basic human rights and rights in the labour market, that are vital to our social and economic lives.

We hope this policy increases employee engagement, promotes the group as a preferred industry workplace, and attracts a talented workforce. Please read it carefully to learn more about your rights and responsibilities as a STARK Group employee.

Scope

This policy is written for business units owned by and belonging to STARK Group worldwide. It outlines the expectations of the company to employees and states what employees can expect from leaders and managers. This policy is applicable to all STARK Group employees and affiliates.

We act with decency and value our people; therefore, it is important that all employees comply with this policy. All STARK Group employees are responsible for following these principles and integrating them into all activities and processes to live the STARK group values of decency, passion, and pride.

All guidelines and procedures that we follow at STARK Group are based on this policy and the values outlined in our Code of Conduct.

Please also seek more information on our other policies, where some of the areas in this policy will be explained in more detail.

Requirements

STARK Group People Policy principles:

1. We are committed to respecting and reinforcing Labour Rights and Rights at Work:

We are committed to respecting international labour standards within our own operations and through our collaboration with our supply chain as stated in our Code of Conduct and our Supplier Code of Conduct, and as elaborated as key topics on the following pages.

2. We comply with all applicable employment laws:

Our commitment is based on core ILO conventions and internationally accepted frameworks from OECD and the United Nations including the UN Guiding Principles on business and human rights, as well as compliance with applicable local legislation where we operate. STARK Group always complies with local legislation and existing contractual agreements.

3. We are committed to monitoring and managing performance within employment law and labour rights:

We are committed to continual improvement and following up on the development of how we perform within employment law and labour rights. We measure and report on key social performance indicators, within i.e., gender equality, engagement and training, to ensure progress in these areas.

4. We are committed to providing remediation:

We are committed to providing appropriate remediation to harmed individuals or communities where we have identified that we have caused or contributed to a negative impact.

5. We are determined to follow our processes:

We are determined to always follow the guidelines described in our reserved matters and the direction set by various committees, Counsel, and other forums where we secure that relevant topics are discussed, and processes are governed and followed as expected.

6. We will take the ramification:

Noncompliance with the stipulations outlined in our People Policy could potentially result in ramifications pertaining to one's employment status.

Key topics in own workforce



Diversity, Equity & Inclusion

STARK Group works to ensure equal treatment and opportunities for all employees and to advance diversity, equity, and inclusion. STARK Group supports freedom of expression and does not discriminate on gender, transgender identity or other expressions, age, culture, nationality, ethnicity, physical abilities, disabilities, hidden disabilities, political and religious beliefs, sexual orientation, or other factors subject to unconscious bias.



Fair compensation and wages

STARK Group pay fair wages and reward good performance. Compensation for employees of STARK Group is based on the market level, performance, and, where relevant, collective bargaining agreements. All reward decisions must comply with local/Group guidelines as well as legislation as elaborated in our compensation policy.



Health & safety

Health and safety are always key priorities for STARK Group, whether it involves our employees, customers, or the communities in which our businesses operate. We work for a safe and healthy work environment, with the aim of an accident-free workplace. All our employees must support continuous improvements in health, safety, and well-being throughout our operations.



Sick Leave

We aim to keep sick days to an absolute minimum. All business units must have guidelines for handling both short and long-term illnesses, so employees receive the support that they need to return to work as soon as possible. Overall, STARK Group should be a safe place to work from a physical and mental standpoint.



Wellbeing

STARK Group's open-door philosophy allows employees to confidently come forward with their concerns. A confidential and anonymous whistleblower line is also available.

Stress is an inevitable part of any profession. All local business units should have a stress policy describing how to avoid stress and how to handle it if it is already present.

STARK Group issues an annual confidential work condition survey, regular performance talks, and development interviews to follow employee satisfaction levels. Employees are entitled to at least one performance talk per year, and we recommend that they are held more regularly if possible.

Key topics in own workforce



The right not to be subject to harassment

STARK Group has zero tolerance towards bullying, harassment and discrimination and is committed to creating an inclusive culture free from these behaviours.



Employee Data Protection

The right to privacy, including the security of personal data, is a priority for STARK Group whether it involves our employees, customers, or other stakeholders. We only collect and process personal data considered necessary for administering an employee's work with STARK.



Recruitment & Promotion

Talent acquisition and internal promotions are key drivers for our company's success. Internal promotions are important to motivate and retain valuable employees.

Where possible, we do our utmost to support our employees who would like to change positions and organizations within STARK Group by offering them opportunities to be directly appointed to a position via internal promotion processes, or as part of internal/external recruitment processes.

We apply a "grandparent approval principle" for key positions to increase transparency, ensure an impartial process, and eliminate bias.



Labour Rights

It is our unwavering commitment to adhere to all Fundamental Principles and Rights at Work. Each employee is recruited with an employment agreement that fully complies with applicable local legislation and trade union agreements, where applicable.

We actively strive towards eradicating all forms of forced or compulsory labor and effectively abolishing child labor.

We hold our suppliers to the same standards, as clearly articulated in our Supplier Code of Conduct.



Labour law and industrial relations

STARK Group believes in freedom of association and complies with all rules and regulations set by law and collective bargaining agreements.

In business units where most of our employees are covered by collective bargaining agreements, we cooperate with representatives and recognize the workers' rights to organize and have union representation.

We have constructive dispute-resolution processes and inform and consult employees and worker representatives when major changes occur and whenever their input is relevant. In some cases, this is done through a local work council, our European Works Council, or other channels, depending on the issue and local culture.

Key topics in own workforce



Development and talent management

STARK Group supports professional development for all employees including classroom training, on-the-job training, and online courses.

We acknowledge that managers and leaders play an important role in developing employee competencies, and we invest time and resources toward giving our managers the skills and understanding needed to build and maintain a working environment that fosters growth.

Our company values and Leadership Model serves as a foundation for our leadership and management training sessions.



Travel and hospitality

We aim to provide safe and sustainable travel options for our employees who travel for business purposes.

Employees should take the following into account when making travel arrangements as stated in the STARK Group Travel Manual :

- Consider sustainability and try to make the smallest environmental impact necessary.
- Strike a balance between cost, time, and sustainability when selecting a mode of transportation.
- Personal preferences should not be the reason for additional travel costs for STARK Group.



Smoking, Alcohol, and drugs

No one may work under the influence of alcohol, illegal drugs, or any substance that prevents them from performing the job safely and effectively.

We are committed to supporting employees who have issues with drugs or alcohol and how to help them return to work as soon as possible.



Termination

Termination should be considered a last resort and we are committed to ensuring that all terminations are done legally, decently, and with respect.

If organizational changes or rounds of lay-offs are required, trade unions can be involved with business units. We always clearly communicate the reason for each termination and ensure that a plan and process is in place to terminate employment.

If an employee must leave for performance reasons, we will give the person due process and the possibility to react accordingly.

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/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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