

Environmental Policy

STARK Group

Version 1.0

13 March 2018

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1. Introduction

STARK Group aim is to run efficient operations that minimise waste and reduce any negative effect of its business activities on the environment.

2. Policy and scope

STARK Group and all its business units should aim to:

1. Comply with all relevant environmental regulation

- As a minimum, all businesses and corporate functions will comply with applicable environmental legislation.

2. Conduct energy and resource efficient operations

- STARK Group will support continued focus on running efficient operations that consume less energy and produce less waste.

3. Establish targets, and monitor and report performance against those targets

- As a minimum, all STARK Group business units will set targets, monitor and report performance for carbon emissions, water consumption and waste production.
- Performance will be monitored and reported by business units to Group HSEQ every six months.
- STARK Group Executive Committee and where requested, the Board of Directors, will review environmental performance at least annually.
- STARK Group will publicly state environmental performance on an annual basis.

4. Promote continuous improvement in environmental performance

- STARK Group will provide guidance and training in all business operations to promote and support responsible environmental performance at all levels of the organization.
- Each business unit will work to reduce their environmental impacts year on year and to achieve their respective targets.
- All businesses will work to improve the accuracy and completeness of data reported.

5. Reduce environmental impacts in the supply chain

- Where possible, STARK Group will work with its suppliers and customers to minimise indirect

environmental impacts in its supply chain.

- STARK Group continues to (i) regularly monitor the market opportunity for environmentally-beneficial products and services, and (ii) share any best practice already available in their Group to fast-track any market offering (iii) in alignment with the Group Product Integrity Policy work with ethical and responsible suppliers ensuring confidence in the integrity of our supply chain and products

6. Promote sustainable products

- Where the opportunity exists, STARK Group strives to gain market share by increasing accessibility and knowledge of sustainable construction products.
- By promoting sustainable products, STARK Groups business units will ensure that business operations provide a positive link in the sustainable construction supply chain.

The principles set out above apply to all areas of the Group's activities

Business units within STARK Group may specify additional environmental policies which are specific and appropriate to their own activities.

It is the responsibility of every employee to contribute to environmentally responsible work practices in our day to day activities. Environmental awareness supports STARK Group's commitment to ensure high employee engagement, as well as driving cost efficiencies.

3. Roles & responsibilities

The following roles and responsibilities apply to this policy.

Policy governance area	Accountable (decision maker in governance area)	Responsible (executes work in governance area)
Ownership & maintenance	Group CEO	Group HR Director Environmental Business Partner
Application – Users of policy	Group HR Director	All STARK Group employees
Compliance with policy	BU CEOs	BU Management Group HSEQ Manager, Environmental Business Partner, BU environmental responsible, HSEQ Team members
Assurance / Branch audits	Group CEO	Group HSEQ Manager, Environmental Business Partner, Group HSEQ-team
Assurance / Corporate reviews and Internal audit	Group CFO	Group Risk & Compliance and / or Corporate Internal Audit
Policy review & approval	Group CEO	Group HSEQ Manager

3.1 Ownership and maintenance

STARK Group CEO is ultimately responsible for decisions in this policy area whereas STARK Group HR Director is responsible for maintaining and updating this policy.

3.2 Application of policy

The Group HR Director is ultimately accountable for ensuring that this policy is deployed for application in STARK Group and its business units and all STARK Group personnel are responsible for adhering to this policy.

3.3 Compliance

The business unit CEOs are accountable for ensuring this policy is adhered to in their business units with support from BU management enforcing policy compliance in their areas of responsibility. The Group HSEQ Manager, supported by the HSEQ Environmental Business Partner, BU environmental responsible and HSEQ Team members, are responsible for ensuring that all relevant users in the business units know and understand this policy.

Questions about this policy or its application should be directed to Group HSEQ Manager. Any employee that disregards this policy will be subject to disciplinary action, at the discretion of relevant management.

3.4 Assurance

Internal branch audits

Compliance with this policy and related procedures in the Group branch operations are monitored and tested periodically by Group HSEQ-team through the internal branch audit program.

Corporate review / Internal audit

Group Risk and Compliance and/or Corporate Internal Audit, as to be appointed by the Group CFO and agreed by Group CEO, will periodically perform corporate level reviews and audits against this policy.

3.5 Policy review and approval

The policy will be reviewed and updated where needed, annually by Group HSEQ Manager, with final approval provided by STARK Group CEO. Re-approval will be sought for material changes only.

4. Version control

Vers.	Description / change	Who	Completion date
1.0	Stand-alone v1 draft creation & initial review	Mikko Reinila	2 March 2018
1.0	Review and sign-off by STARK Group HSEQ Manager and Environmental Business Partner	Laila N. Therkildsen Louise Askær-Hune	8 March 2018

1.0	Review and sign-off by STARK Group HR Director	Lene Groth	8 March 2018
1.0	Sign-off by STARK Group CEO	Søren P. Olesen	13 March 2018