

STARK GROUP POLICIES

SUPPLIER CODE OF CONDUCT

Version 4.0 – May 2025



CEO Message

At STARK Group, we are committed to delivering sustainable solutions for our industry. This applies in relations to our customers, colleagues, suppliers and the communities we are part of.

We want to encourage our values of decency, passion and pride in our interactions with our stakeholders and we are committed to international principles of responsible business conduct.

As part of this commitment, STARK Group is a signatory to the United Nations Global Compact and we are guided by the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines on Multinational Enterprises. Furthermore, STARK Group is committed to reach net zero emissions, and we have set science-based targets.

We want to have strong collaborations with our suppliers and a sustainable supply chain is crucial to our common success. We aim to understand our social and environmental impacts in the supply chain and expect our suppliers will collaborate to continuously improve practices. STARK Group is therefore a member of amfori, a leading business association for sustainable trade.

STARK Group Supplier Code of Conduct applies to all suppliers to STARK Group including all Business Units. It is the responsibility of our suppliers to ensure that their sub-suppliers and other third parties acting on their behalf comply with the standards of this Code.

Søren P. Olesen

CEO, STARK Group A/S

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Content

1

Introduction

2

Social Compliance

3

Environmental Performance

4

Responsible Sourcing

1. Introduction

At STARK Group we are committed to responsible business conduct both in our own operation and in our supply chain. We want to work with our suppliers to continuously improve practices in relation to social and environmental impacts.

As part of our commitment to responsible business conduct, STARK Group is a member of amfori, which is a leading business association for sustainable trade.

STARK Group Supplier Code of Conduct is based on the amfori BSCI Code of Conduct v. 2021 and the amfori BEPI Code of Conduct v. 2024 which combined covers 13 social compliance areas as well as 8 environmental performance areas. The original documents are available at amfori.org, however, in the spirit of transparency, we have included the full text in this document.

The Responsible Sourcing section states requirements that are specific to our industry and certain product types.

STARK Group requires all suppliers to comply with local and national laws and regulations as well as adhere to the minimum requirements outlined in this Supplier Code of Conduct.

The requirements in this Code are universal but we understand that the methods for meeting them may differ depending on location, size and sector.

STARK Group believes that the standards for responsible business conduct are best implemented by focusing on continual improvement, collaboration and transparency.

Our Supplier Code of Conduct is the foundation for further risk assessment and monitoring activities aligned with international standards on social and environmental due diligence. We expect our suppliers to participate in assessment and monitoring activities, which may include self-assessments, questionnaires, interviews, audits, capacity building activities or other necessary measures.

STARK Group reserves the right to suspend or terminate potential or existing business relationships a) if there is a reluctance or no willingness to cooperate on assessment or evaluation in relation to the Supplier Code of Conduct, b) if there is reluctance or no willingness to work on improving management systems to manage risk of negative impact in relation to social or environmental areas or c) if a supplier fails to comply with the requirements in the Supplier Code of Conduct. Terminating business relationships will be seen as a last resort as described in international guidelines on due diligence.

Suppliers must actively inform STARK Group if non-conformities in relation to the requirements in this Code are identified so relevant action can be taken to address the impact. We aim to work collaboratively with the relevant supplier to implement a remediation plan according to a timeline dependent on the severity of the non-conformity.

References to international principles and guidelines

The Supplier Code of Conduct is aligned with the amfori BSCI Code of Conduct v. 2021 and the amfori BEPI Code of Conduct v. 2024. These two documents are based on and refers to, the following principles and guidelines:

- United Nations (UN) Universal Declaration of Human Rights
- International Labour Organization (ILO) Conventions and Recommendations
- UN Guiding Principles on Business and Human Rights (UNGPR)
- OECD Guidelines for Multinational Enterprises
- UN Children's Rights and Business Principles
- Gender Dimensions of the UN Guiding Principles on Business and Human Rights
- OECD Sectoral Guidance Documents
- All relevant global treaties on environmental protection, including the Montreal Protocol, the Basel Convention, the Convention on Biological Diversity, the Kyoto Protocol, the Stockholm Convention, the Minamata Convention, and the Paris Agreement
- National regulations for environmental protection

Values when implementing responsible business conduct

STARK Group commits to follow the amfori values below (as well as our own values) when implementing processes for responsible business conduct. We expect our suppliers to do the same.

▪ Continuous improvement

STARK Group and our suppliers undertake to implement the Supplier Code of Conduct using a comprehensive approach, and embedded in their management systems and company culture, to ensure continuous improvement of due diligence within their organisations and relevant supply chains. In addition, STARK Group and our suppliers commit to engaging in constructive dialogue and working with their business partners and stakeholders to improve environmental performance. Disengagement should only be considered as a last resort when all other means for improvement have been attempted. Continuous improvement must also consider the needs of any vulnerable persons who may be affected by operations, in own operations or in the supply chain.

▪ Cooperation

STARK Group and our suppliers will have a greater impact on, and a better chance of identifying, assessing, preventing, mitigating, and remediating human rights and environmental violations in their organisations and supply chains by committing to working collaboratively with relevant stakeholders and taking a comprehensive approach to due diligence. The spirit of cooperation is crucial in the engagement between STARK Group, the suppliers and stakeholders at different levels, particularly to create leverage.

▪ Empowerment

STARK Group and our suppliers will commit to develop their organisations and empower stakeholders involved in their supply chains in a way that respects human rights, protects the environment and enables continuous improvement.

▪ Code observance

Complying with national legislation is the first obligation of business enterprises. In countries where the national legislation sets a different standard of protection than the Supplier Code of Conduct and its references, the suppliers shall abide by the principles that provide the highest protection to the workers and the environment, without contradicting the legal framework of the country.

▪ Protection of vulnerable persons

STARK Group and our suppliers commit to the protection and empowerment of vulnerable individuals, and members of vulnerable groups and communities, to the best of their influence. STARK Group and our suppliers understand that vulnerability can depend on the context, and certain individuals, groups, and communities may be vulnerable in more than one aspect.

▪ Transparency

STARK Group and our suppliers commit to being transparent:

- With each other, and with any third party involved as relevant (e.g., auditors, quality partners), within the context of identification, prevention, and remediation of adverse human rights and environmental impacts. Suppliers will proactively inform other relevant suppliers and STARK Group on any critical incidents, as well as the effectiveness of any responses to any adverse impacts.
- Through reasonable disclosure to shareholders, stakeholders, and governments regarding their impacts on the supply chain and in the surrounding communities, as well as the environment, in line with national legislation requirements where available.

The Social Compliance section is a literal translation of the amfori BSCI Code of Conduct v. 2021. As a business partner which has endorsed the amfori BSCI Code of Conduct, we have adapted the document into our own layout to better contribute to the amfori BSCI cascade effect.

The Environmental Performance section is a literal translation of the amfori BEPI Code of Conduct v. 2024. As a business partner which has endorsed the amfori BEPI Code of Conduct, we have adapted the document into our own layout to better contribute to the amfori BEPI cascade effect.

2. Social Compliance

STARK Group expects suppliers to comply with the following requirements in relation to social compliance:

2.1 Social Management System and Cascade Effect

- Adopt and publicly communicate a written human rights policy statement, in line with the complexity and size of operations, approved at the most senior level,
- Implement a process- and risk-based due diligence management system in their business practices in line with the UNGPs, and adjusted to the business model of the company. The expectations set in this Code of Conduct should be embedded in the system,
- Actively communicate their endorsement of the amfori BSCI Code of Conduct through all the functions in their company, as well as to their business partners and relevant stakeholders,
- Train and incentivize all relevant departments and individuals in a manner that allows them to integrate the principles of responsible and gender-responsive business and purchasing practices in the company culture, and cascade it to their business partners,
- Require their business partners to cascade the information to the relevant business partners and stakeholders in the supply chain,
- Require and follow-up with their business partners to work towards full observance of the amfori BSCI Code of Conduct within the sphere of their influence, including intermediaries that are involved in the worker recruitment process, such as brokers, recruiters and recruitment agencies,
- Include all workers in their due diligence, especially the vulnerable parts in their supply chain such as home-based workers, smallholders, as well as temporary and migrant workers; identify the challenges at these levels, and partner with amfori and other relevant stakeholders for improvements,
- Have the strategy, processes, and sufficient resources in place to meet the responsibilities related to the amfori BSCI Code of Conduct and ensure that there is continuous improvement in its implementation,
- Exercise responsible and gender-responsive purchasing practices, and avoid putting their business partners in a position that prevents them from adhering to the amfori BSCI Code of Conduct.

2.2 Workers Involvement and Protection

- Establish responsible and gender-responsive management practices that involve all workers and their representatives in sound information exchange on the due diligence process,
- Define long-term goals to protect workers in line with the aspirations of the amfori BSCI Code of Conduct,
- Take specific steps, such as trainings, to make workers aware of their rights and responsibilities, with special attention to vulnerable persons. When relevant, intermediaries such as brokers, recruiters, and recruitment agencies should play an active role in achieving these steps,
- Build sufficient competence among the managers, workers, and worker representatives within their company, as well as in the supply chain, in order to embed the amfori BSCI Code of Conduct in their company culture, and promote continuous education and training at each level of work,
- Establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted, and maintain accurate records. The operational-level grievance mechanism must be in line with UNGP Article 31. Where relevant (e.g. when a migrant worker population is present), the operational-level grievance mechanism should be accessible in relevant local languages, and should allow to address and remedy the issues effectively across jurisdictions through partnerships and coordination.

2.3 The Rights of Freedom of Association and Collective Bargaining

- Respect the right of workers to form and join trade unions – or to refrain from doing so – and bargain collectively, in a free and democratic way, without distinction whatsoever and irrespective of gender,
- Ensure meaningful representation of all workers, without distinction whatsoever and irrespective of gender,
- Not discriminate against workers because of trade union membership,
- Not prevent workers' representatives and recruiters from having access to workers in the workplace or from interacting with them,
- Respect this principle by allowing workers to freely elect their own representatives with whom the company can enter into dialogue about workplace issues, when operating in countries where trade union activity is unlawful or where free and democratic trade union activity is not allowed.

2.4 No Discrimination, Violence or Harassment

- Treat all workers with respect and dignity,
- Ensure that workers are not subject to any form of violence, harassment, and inhumane or degrading treatment in the workplace, as well as threats of violence and abuse, including corporal punishment, verbal, physical, sexual, economic or psychological abuse, mental or physical coercion, or other forms of harassment or intimidation,

- Understand the possible grounds for discrimination in their specific context, and not discriminate or exclude persons based on sex, gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in unions or any other legitimated organisations, political affiliation or opinions, sexual orientation, family responsibilities, marital status, pregnancy, diseases, or any other condition that could give rise to discrimination,
- Establish disciplinary procedures in writing and explain them verbally to workers in terms and language which they understand. The disciplinary measures must be in line with national legislation,
- Provide gender-sensitive and equal opportunities and treatment throughout recruitment and employment,
- Verify that workers are not harassed, disciplined, or retaliated upon for reporting issues on any of the grounds listed above.

2.5 Fair Remuneration

- Comply, as a minimum, with wages mandated by governments' minimum wage legislation, or industry standards approved based on collective bargaining, whichever is higher. The wages shall refer to standard working hours,
- Pay wages in a regular, timely and stable manner, and fully in legal tender. Partial payment in the form of allowance "in kind" is only accepted in line with ILO specifications,

- Assess the pay gap accurately, and work progressively towards the payment of a living wage that is sufficient to afford a decent standard of living for the workers and their families,
- Reflect the skills, responsibility, seniority, and education of workers in their level of wages,
- Where a pay rate for production, quota or piece work, is established, allow workers to earn at least a wage which respectively meets or exceeds applicable legal minimum wages, industry standards, or collective bargaining agreements (where applicable) within standard working hours,
- Ensure that workers of all genders and categories, such as migrant and local workers, receive the same remuneration for equal jobs and qualification,
- Implement deductions only under the conditions and to the extent allowed by law or fixed by collective agreement,
- Provide the workers with the social benefits that are legally granted, such as without negative impact on their pay, level of seniority, position, or promotion prospects.

2.6 Decent Working Hours

- Ensure that workers are not required to work more than 48 standard hours per week, without prejudice to the specific expectations set out hereunder. Exceptions specified by the ILO are recognized,

- Interpret applicable national legislation, industry benchmark standards or collective agreements within the international framework set out by the ILO, and promote working hour practices that enable a healthy work-life balance for the workers,
- Only exceed the limit of hours described above in line with exceptional cases defined by the ILO, in which case overtime is permitted,
- Use overtime as an exceptional and voluntary practice, paid at a premium rate of minimum 125% of the standard rate. Overtime shall not represent a significantly higher likelihood of occupational hazards, and in no circumstance go the limits defined under national legislation,
- Grant their workers the right to resting breaks in every working day and the right to at least one day off in every seven days, unless exceptions defined by collective agreements apply.
- Train all departments and individuals on occupational health and safety regularly throughout all stages of employment, and provide information on potential occupational health and safety risks to workers and public, including affected communities,
- Take effective measures to prevent workers from having accidents, injuries, or illnesses, arising from, associated with, or occurring during work. These measures aim at minimizing, so far as is reasonable, the causes of hazards inherent within the workplace,
- Seek improving workers' protection in case of accident, including through compulsory insurance schemes,
- Maintain records of all health and safety incidents in the workplace and all other facilities that are provided or mandated,
- Take all appropriate measures, and obtain all relevant licenses and documentation required by national legislation, to see to the stability and safety of the equipment and buildings they use, as well as to protect against and prepare for any foreseeable emergency. This includes residential facilities for workers when these are provided or mandated by the employer or a recruitment partner,
- Establish relevant committees, such as an Occupational Health and Safety Committee, to ensure active co-operation between management and workers, and/or their representatives for the development and effective implementation of systems that ensure a safe and healthy work environment. These committees aim to represent the diversity of the workers,

2.7 Occupational Health & Safety

- Respect the right to healthy working and living conditions of workers and local communities, without prejudice to the specific expectations set out hereunder. Vulnerable persons, such as - but not limited to - young workers, new and expecting mothers and persons with disabilities, shall receive special protection,
- Comply with national occupational health and safety legislation, or with international standards where national legislation is weak or poorly enforced,
- Ensure that there are systems in place to assess, identify, prevent, and mitigate potential and actual threats to the health and safety of workers,

- Provide awareness to workers, and respect their right and responsibility to exit the premises and/or stop working without seeking permission in dangerous situations and uncontrolled hazards,
- Provide adequate occupational medical assistance and related facilities and provide equal access to all workers for these services. Health services (including insurance) should serve the distinctive concerns and needs of all genders and ages,
- Provide access to safe and clean drinking water, and eating and resting areas free of charge, and where applicable, provide access to cooking and food storage areas,
- Provide an adequate number of safe, separate toilets with adequate level of privacy for all genders, and paper towels and washbasins with hand soap in all work areas,
- Ensure that when residential facilities are provided or mandated, they are clean and safe, and they meet all the basic needs of the workers,
- Provide effective and tailored Personal Protective Equipment (PPE) to all workers free of charge, taking the needs of different worker categories, such as pregnant and nursing women, into consideration,
- Compensate the damages incurred to the workers on the occasion that historical or actual failure of adherence to principles is identified.

2.8 No Child Labour

- Not employ, directly or indirectly, children below the minimum age of completion of compulsory schooling as defined by law, which shall not be less than 15 years, unless the exceptions recognised by the ILO apply,
- Protect children from any form of exploitation,
- Establish robust age-verification mechanisms as part of the recruitment process, which may not be in any way degrading or disrespectful to the worker,
- Take special care and identify measures in a proactive manner in case of the dismissal and removal of children, to ensure the protection of affected children.

2.9 Special Protection for Young Workers

- Ensure that young persons do not work at night and that they are protected against conditions of work which are prejudicial to their health, safety, morals, and development, without prejudice to the specific expectations set out in this principle,
- Remove young workers from any hazardous work or source of hazard immediately when such cases are identified, and redefine their scope of work without any loss of income,

- Ensure that (a) the kind of work is not likely to be harmful to young workers' health or development; (b) their working hours allow their attendance in school, their participation in vocational orientation approved by the competent authority or their capacity to benefit from training or instruction programmes,
- Set the necessary mechanisms to prevent, identify and mitigate harm to young workers, with special attention to the provision and access of young workers to effective operational grievance mechanisms and to Occupational Health and Safety trainings schemes and programmes specific to the needs of young workers.

2.10 No Precarious Employment

- Ensure that, their recruitment process and employment relationships do not cause insecurity and social or economic vulnerability for their workers,
- Ensure that work is performed on the basis of a recognised and documented employment relationship, established in compliance with relevant national legislations, custom or practice, and international labour standards, whichever provides greater protection,
- Before entering employment, provide workers with understandable information in their own language and ensure that they are aware about their rights, responsibilities, and employment conditions, including working hours, remuneration and terms of payment in their own language,

- Aim at providing decent, and where relevant, flexible working conditions that also support workers, irrespective of gender, in their roles as parents or caregivers, including migrant and seasonal workers whose children may be left in their hometowns,
- Not use employment arrangements in a way that deliberately does not correspond to the genuine purpose of the law. This includes - but is not limited to - (a) apprenticeship or training schemes where there is no intent to impart skills or provide regular employment, (b) seasonality or contingency work when used to undermine workers' protection, (c) labour-only contracting, and d) contract substitution,
- Not use subcontracting in a way that undermines the rights of workers.

2.11 No Bonded, Forced Labour or Human Trafficking

- Not engage in, or through business partners, be complicit to, any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour, including state-imposed forced labour,
- Adhere to international principles of responsible recruitment, including the Employer Pays Principle, and require the same from their recruitment partners, when engaging and recruiting all workers, either directly or indirectly, especially members of vulnerable groups such as temporary and migrant workers, . As a minimum, this includes:
 - No recruitment fees and costs are charged to workers
 - Clear and transparent employment contracts
 - Workers' freedom from deception and coercion

- Freedom of movement and no retention of identity documents
- Access to free, comprehensive, and accurate information
- Freedom to terminate contract, change employer, and safely return
- Access to free dispute resolution and effective remedies
- Progressively compensate the damages incurred to the workers within a reasonable timeframe, and within the framework of the same international principles, if historical or actual failure of adherence to principles is identified.

2.12 Protection of the Environment

- Implement a process- and risk-based environmental due diligence management system in their business practices, adjusted to the business model of the company. This can also be integrated into the overall due diligence management system,
- Comply with national environmental legislation, or with international standards where national legislation is weak or poorly enforced,
- Identify the environmental impacts of their operations, and implement adequate measures to prevent, mitigate and remediate adverse impacts on the surrounding communities, natural resources, climate, and the overall environment.

2.13 Ethical Business Behaviour

- Not take part in any act of corruption, extortion or embezzlement, nor in any form of bribery - including but not limited to - the promising, offering, giving or accepting of any improper monetary or other incentive,
- Develop and adopt adequate internal controls, programmes or measures for preventing and detecting corruption, extortion, embezzlement or any form of bribery, developed on the basis of a company-specific risk assessment,
- Keep accurate information regarding their activities, structure and performance, and disclose these in accordance with applicable regulations and industry benchmark practices to enhance transparency of their activities,
- Not falsify, or participate in falsifying any information or in any act of misrepresentation in the supply chain,
- Provide awareness to the workers about the policies, controls, programmes and measures against unethical behaviour, and promote compliance within the company through trainings and communication,
- Collect, use, and otherwise process personal information (including that from workers, business partners, customers and consumers in their sphere of influence) with reasonable care. The collection, use and other processing of personal information must comply with privacy and information security laws and regulatory requirements.

3. Environmental Performance

STARK Group expects suppliers to comply with the following requirements in relation to environmental performance:

3.1 Environmental Management System

- Implement a process- and risk-based environmental due diligence management system in their business practices, adjusted to the business model of the company. This can also be integrated into the overall due diligence management system.
- Comply with national environmental legislation, or with international standards where national legislation is weak or poorly enforced.
- Identify the environmental impacts of their operations, and implement adequate measures to prevent, mitigate and remediate adverse impacts on the surrounding communities, natural resources, climate, and the overall environment.
- Assessing environmental management practices of business partners so they can identify, assess, monitor, and control adverse impact(s) on the environment and humans.
- Reviewing business partners' processes to ensure legal compliance and prevent major environmental incidents.

3.2 Energy & Climate

- Establishing and implementing effective management practices and encouraging business partners to do the same to identify, quantify and reduce the greenhouse gas emissions resulting from their energy use.
- Ensuring in own operations and those of business partners there is an expectation to use international good practice and standards to manage energy use.
- Ensuring there are effective energy management practices in own operations and those of business partners.

3.3 Emission To Air

- Ensuring in own operations and in those of business partners' effective management practices to identify, monitor, and control emissions to air and their impact on the environment and humans.
- Specifically ensuring that own operations and those of business partners, emissions of Ozone-depleting, or other hazardous, substances are strictly managed.

3.4 Water & Effluents

- Reviewing water and effluents management practices in own operations and business partners to identify, monitor, and ensure effective controls are in place to avoid adverse impact(s) on the environment and humans.
- Encouraging own operations and business partners to adopt measures that promote efficiency in water consumption and water reuse where possible.
- Encouraging own operations and business partners to adopt measures that reduce or eliminate adverse impacts of effluents by reducing their quantity and/or their content of hazardous substances.

3.5 Waste

- Reviewing waste management practices used in own operations and by business partners to identify, monitor, and ensure effective control of waste-related impact(s) on the environment.
- Monitoring waste generation and encouraging management practices that divert waste from disposal (reuse, recycling and/or other recovery operations).
- Encouraging own operations and business partners to adopt measures that reduce or eliminate adverse impacts of wastes, for example through improved processes

3.6 Biodiversity

- Reviewing management practices used in own operations and by business partners to identify, monitor, and control adverse impacts on biodiversity.

- Encouraging own operations and business partners to adopt, where possible, measures that create positive impacts for biodiversity.

3.7 Chemicals

- Reviewing chemicals management practices used in own operations and by business partners to identify, monitor, and ensure effective control of chemical-related impact(s) to people and/or the environment.
- Encouraging own operations and business partners to use alternative substances that are less hazardous to people and/or the environment.

3.8 Nuisances

- Reviewing management practices used by own operations and business partners to identify, monitor, and control the impacts of noise and other potential nuisances, such as light pollution, dust or traffic on the environment and local community, and where necessary, implementing corrective actions or remediation activities.
- Suppliers commit to addressing adverse impacts or risks in the above-mentioned environmental performance areas in their own operations and in their relevant supply chains. For each of these areas, suppliers are encouraged to:
 - Set internal targets and support relevant business partners to set and monitor their own targets for improvement and track this over time.
 - Look to international good practice guidelines to support in the effective management of risks.

4. Responsible Sourcing

STARK Group expects suppliers to comply with the following requirements that are specific in relation to timber, natural stone and minerals:

4.1 Responsible Sourcing of Timber

- Suppliers are required to adhere to the STARK Group Responsible Timber and Timber Related Products Policy. The policy is available at [Policies :: STARK Group](#)
- Suppliers that provide products that are in scope of EU Timber Regulation (EUTR)/EU Deforestation Regulation (EUDR) and/or UK Timber Regulation (UKTR) shall comply with these regulations as well as other legislation in force at any time and in the importing and exporting countries. Suppliers shall ensure that timber has been cut and produced in compliance with the legislation of the country of origin and that it has not contributed to deforestation and/or forest degradation. Suppliers must provide STARK Group with relevant and requested data in relation to documenting timber and timber related products are deforestation free.
- Suppliers shall not import or participate in importing illegally cut timber, irrespective of the country of origin or any third country.
- Suppliers shall promote production of sustainable timber products, preferably certified as FSC® or PEFC.

4.2 Responsible Sourcing of Natural Stone

- Suppliers must ensure that all employees have access to necessary safety and protection equipment and document that they and their sub-suppliers comply to ILO Convention No. 182 regarding child labour.
- Suppliers shall declare with country of origin and processing facility.
- Natural stone products certified according to XertifiX, Fair Stone or TFT Responsible Stone Program will be favored.

4.3 Responsible Sourcing of Minerals

- We expect our suppliers commit to responsible sourcing of minerals consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework. This framework concerns specifically “conflict minerals” which are minerals from conflict-affected and high risk areas, namely tin, tantalum, tungsten and gold (3TG) .
- We expect suppliers to adopt a policy and exercise due diligence on the source and chain of custody of 3TG in the products they manufacture and sell to STARK Group. We expect our suppliers can document upon request that minerals are sourced consistently with the OECD framework.

Roles & responsibilities

Roles & responsibilities	Accountable
Policy approval	ExCom
Policy Owner	STARK Sourcing CEO

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 (whistleblownetwork.net).

Contact

For more information, please contact STARK Sustainable Sourcing.

Policy Revision History

Review cycle: Annually Q3
It may be amended at any time with the approval of ExCom.

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