

CODE OF CONDUCT

STARKA GROUP



STARKA



INTRODUCTION

The Starka Group is an independent family business that manufactures and supplies quality products for construction and civil engineering purposes.

This Code of Conduct summarizes the common rules and values that everyone within STARKA should strive to build trust and good relationships with colleagues, customers, business partners and our world around us. The company strives for the highest level of ethical conduct, and these rules should guide all situations that affect our work and our operations. We expect everyone, regardless of position, to behave and represent the company in the best possible way in terms of professionalism, business acumen and confidence in the environment and adhere to the high ethical requirements in their professional practice.

It is also important that our employees are happy and that we have a good working climate. All contact between employees, whether they are leaders or colleagues, must also be done with respect, responsibility and consideration for each other, which creates our success.

WE WORK TOGETHER

We work actively for:

- Equal opportunities
- A safe working environment
- Clear information in the organization
- Respect for personal integrity
- Increased durability
- Zero tolerance against harassment
- Zero tolerance to alcohol and drugs at work
- Good business ethics



LAWS, REGULATIONS & RULES

We all work in different locations, in different positions and with different tasks. But regardless of where we work within Starka, we must use our good judgment and common sense.

All employees, customers, suppliers and other business partners must comply with applicable laws, standards and regulations in the industry areas and countries in which we operate. This applies both to our own production, how we treat our employees and how we handle our accounting, accounting and taxes.

HUMAN RIGHTS

STARKA supports and respects the United Nations Declaration on Human Rights and accepts our responsibility to uphold the rights of employees and society in our operations. We encourage active international cooperation with the aim of improving the conditions for those who work with our products.

STARKA does not deal with any country, company or individual against which the UN or the European Union have issued sanctions.

Child labour

STARKA does not accept forced or child labour and supports the UN Convention on the Rights of the Child (UNCRC). We must make sure that the products we sell do not come from companies that use child laborers.

Trade unions

STARKA respects the right of employees to form and join the unions they themselves want and to negotiate collectively.



ETHIC AND MORAL

Our ambition is to continually exceed the demands of customers and other stakeholders on the quality of our services / products. We also keep what we promise in customer relations but also in the internal work. We carry on our activities with high integrity and morality and follow our high ethical rules. We also take responsibility for our actions.

We also require that all employees are aware of and follow our procurement guidelines, but also contribute to reduce costs as far as possible.

In order to maintain our business ethics, we should never act in violation of applicable competition laws, e.g. by abusing a dominant position; participating in illegal industry cooperation, e.g. through cartel formation.

We also do our work regarding confidentiality and we ensure that no unauthorized persons or companies may access confidential information, either internally or externally.

We all behave in an ethically defensible way.

BRIBERY AND GIFTS

We never accept, directly or indirectly, bribes or other irregular benefits or compensation, for the benefit of the business and / or for financial gain.

Employees may receive and offer gifts, services and entertainment from and to customers and suppliers, provided that these are not overly generous or excessive. If you are unsure if it is appropriate, check with your HR manager or CEO. We act correctly, do not offer or arrange trips, give gifts or other services or benefits that cannot be reviewed and reported openly. This approach also applies when receiving the above.



WORKING ENVIRONMENT

We strive to create a supportive work environment where collaboration, individual responsibility, innovation and high performance are important core values. The company follows health and safety rules and laws, and all employees are expected to take responsibility for ensuring that the workplaces are safe for themselves and their colleagues.

We regularly evaluate the company and the employees' views through employee surveys and create joint action plans that are also followed up. We also work continuously with our employees and the trade unions to create and develop a safe work environment. The competence of all employees is an important asset and the company wants to give everyone an individual development.

We respect that all employees need a healthy work-life balance.

Alcohol and Drugs

No employee may be affected by alcohol or drugs during work. The use of alcohol and other drugs can be a problem for the individual employee as well as for colleagues and the company. Employees who have substance abuse problems should be given support and, in this way, create the opportunity to do their work. We have zero tolerance against the consumption of alcohol during working hours.

Employees may not be involved in any transaction involving the handling, sale or purchase of illegal drugs. Illegal drugs must not be taken into the company's premises.

OUR BUSINESS PARTNERS

We strive to ensure that our suppliers are willing to meet the requirements set out in this publication. We choose our suppliers in a professional, systematic and fair manner. Our negotiations with the suppliers must be done in an honest and fair manner.

We nurture our customers' trust in our company by providing information about our values and our business. In order to live up to and strengthen their confidence in us, we must have an open attitude in dialogue with them. We respond to requests from outsiders and communicate quickly, correctly and effectively



EQUALITY, DIVERSITY & DISCRIMINATION

STARKA values diversity among its employees. We do not accept bullying, discrimination, discrimination or harassment at any of our workplaces because of gender, gender identity or expression, ethnic affiliation, religion or other beliefs, disability, sexual orientation or age. No one should be discriminated against or harassed for political reasons, nor for social or ethnic origin.

Salaries and benefits

We ensure that wages and benefits reach at least up to statutory levels and / or the lowest industry standard in the countries in which we operate.

We also reward employees with individual salary development through performance without discrimination.

ENVIRONMENTAL IMPACT

STARKA provide open and information about our environmental work to employees and other stakeholders. We conduct active work to continuously reduce the company's direct and indirect environmental impact. Suppliers are expected to act in line with our environmental policy.

Suppliers must therefore know and comply with requirements in accordance with national legislation, regulations and industry standards. This includes having knowledge of and control over its environmental impact, as well as continually working on improving environmental measures in its operations. We strive to constantly use the most environmentally sound technology that is economically defensible.





BUSINESS INFORMATION & PROPERTY

Protect company property

All employees must protect the information and equipment that we have in our environment or that are assigned and that will be used in the work. Above all, employees must ensure that valuable electronic equipment, such as laptops, mobile phones and smartphones, is always stored safely.

It is not the company's intention to generally monitor e-mail, Internet access, etc., but if circumstances are such that it is required, for example by suspicion of crime, this may be done by authorized personnel.

Protect business information

Information about the company and our employees must be treated as sensitive information and must be protected and must not be disseminated to unauthorized persons or outside the company, except for information that is passed on for specific business purposes.

Examples of sensitive information are:

- acquisitions
- disposal
- new products
- strategies
- customer information
- design
- personnel and organizational information
- production methods and recipes

All employees must be extremely careful so that electronic equipment containing sensitive and confidential material (e.g. USB flash drives) is not removed or for any reason left to a third party outside the company. Everyone who handles business information (especially financial information) is required to verify that it is accurate and reliable.

The confidentiality also applies after termination of employment.



CONTACT WITH MEDIA

Only the CEO can speak to the media on behalf of the company. If an employee is contacted by a media representative due to any company case, the person concerned is referred to the CEO without any statements. The request for interviews with any employee of the company regarding the company or its business, as well as the issue of press releases by any employee of the company, must be read and approved in advance by the CEO. Interviews initiated by someone at the company must be approved by the CEO before time is agreed with the media.

Our reputation and brand identity can be adversely affected by careless comments or misrepresentation or negative information. The company is seriously considering whether an employee would leak information about the company to the media or talk to journalists without the prior approval of the CEO.

EVERYONE'S RESPONSIBILITY

This Code of Conduct applies to all employees of STARKA. Everyone is expected to have access to and act accordingly. Managers must notify all their employees directly under the code and it is part of the employment contracts. Although there may be questions of interpretation, the code describes the requirements that everyone who works for the company is expected to fulfil. All employees have an individual responsibility to read and follow this Code of Conduct and to ask questions in the event of ambiguity.

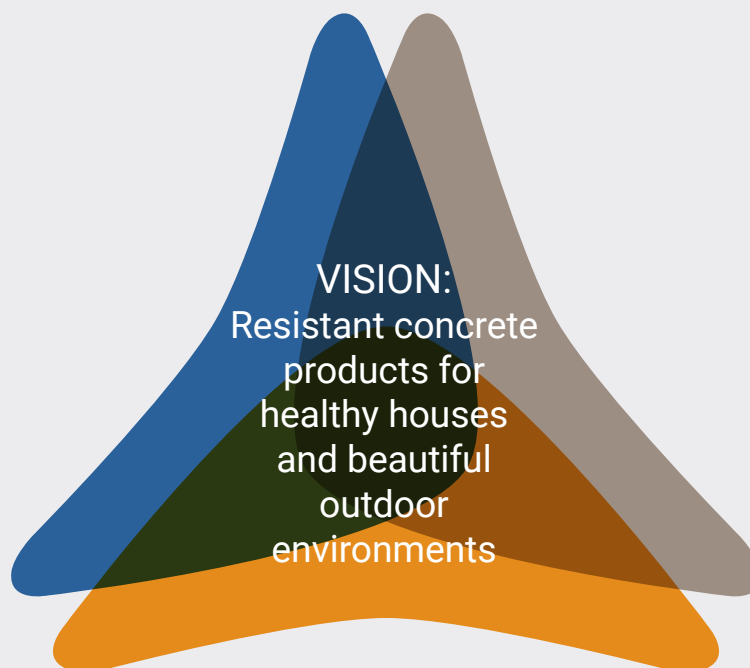
Report violations

If an employee suspects that a violation of this code has taken place, the parent must be informed immediately. If employees cannot raise the issue with their superior, the human resources manager or, in severe and urgent cases, the CEO can be informed instead. However, we are serious about violations because we see that we have a business that is characterized by high business ethics and morals. In these cases, we make individual assessments of what has happened and then assess what possible consequences this may have for the individual. However, we always strive to offer a supportive climate where employees should feel confident that they can report cases of suspected violations.



OUR CUSTOMERS

We support our customers' business processes with sustainable building systems. We nurture and respect their trust in our company.



SOCIETY, OUR SUPPLIERS AND PARTNERS

We believe in a long-term and professional relationship to jointly build for future generations.

OUR STAFF

With job satisfaction and a good working environment our staff should be given opportunities to develop and grow in their work role.

WE CREATE SUSTAINABLE ENVIRONMENTS IN CONCRETE

Ever since the 1930s, our key words have been quality, dedication and solid craftsmanship. With a natural and reusable material with a long life, we build a sustainable future for us, our children and the environment. We are proud of that. Read more about us and our products on www.starka.se.

Starka is a member of Sweden's Construction Industries and follows their guidelines on code of conduct.



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