

Policy for Ethics and Transparency

1. Introduction

STIM is committed to conducting its business in a responsible, ethical and sustainable manner. This ethics and transparency policy (hereinafter referred to as the “Policy”) provides an overall framework and guidance for all employees, managers and board members of STIM, and forms the basis for the requirements placed on suppliers and business partners. The Policy is based on the OECD Guidelines for Multinational Enterprises and aims to ensure that STIM meets international standards for responsible business conduct.

2. Commitments

STIM is committed to:

- a) Respecting and protecting human rights, including labour rights, in all aspects of its business.
- b) Protecting the environment and working continuously to reduce its environmental impact, including emissions, waste and resource use, and promoting sustainable practices and innovation in all aspects of its business.
- c) Complying with national and international laws, regulations and standards, including environmental, labour and human rights laws, as well as industry-specific standards and best practices.
- d) Promoting transparency and communication, both internally and externally, about the company’s activities, results and challenges related to ethics, sustainability and social responsibility.
- e) Combating corruption, bribery and other forms of economic crime, and working to promote ethical business practices in all transactions and business relationships.
- f) Acting prudently and responsibly towards all stakeholders, including employees, customers, suppliers, governments, local communities and other affected parties, and seeking constructive dialogue and cooperation to identify and solve problems and challenges.

STIM employees commit to:

- a) Promoting honesty, integrity, loyalty and fairness in all dealings with customers and partners.
- b) Following the company’s Anti-Corruption Policy; including never offering, giving, requesting or receiving any gift, payment, hospitality or other benefit in exchange for business advantages.
- c) To contribute to a safe and rewarding work environment, including refraining from all forms of bullying or discriminatory and harassing statements or behaviour.

3. Implementation and follow-up

- a) STIM shall establish and maintain effective systems and procedures to ensure compliance with this Policy and to identify, assess and manage ethical, social and environmental risks and opportunities in its business.

- b) All employees, managers, board members and contractors shall be trained and guided in the Policy and expected to follow it in their work and decision-making.
- c) STIM shall regularly monitor and evaluate its performance in relation to the Policy and report openly on its progress, challenges and plans for improvements to stakeholder groups.
- d) STIM shall encourage dialogue and collaboration with stakeholder groups to learn from their experiences and perspectives, and to strengthen the Policy and its implementation.
- e) STIM shall establish and maintain an open and safe communication channel for employees and other stakeholder groups to report concerns or breaches of the Policy, and to ensure that such reports are handled in a fair and effective manner.

4. Responsibility and authority

- a) The board of STIM has overall responsibility for approving and monitoring the Policy and its implementation.
- b) The management of each of STIM's companies is responsible for ensuring that the Policy is implemented and complied with in their respective businesses, and for reporting on performance and challenges to the executive management of STIM. The executive management is responsible for reporting to the Board.
- c) All employees, managers, board members and contractors have a personal responsibility to act in accordance with the Policy and to contribute to identifying and resolving ethical, social and environmental problems and challenges in the Group's business.

5. Revision and update

The Policy shall be reviewed and updated regularly, at least every three years, to ensure that it remains up to date with changes in STIM's business, market, technology, legislation and societal expectations. Any changes to the Policy shall be approved by the Board and communicated to all affected parties.