

STARCO's statement on the Anti-Corruption and Anti-Bribery Act

Introduction

Integrity is a part of our values, which sets a high standard for all STARCO employees in terms of moral, ethical and honest attitude and behaviour. STARCO operates in a global environment where risks of corruption vary depending on the country and nature of business. Therefore, we work to implement a universal approach to fighting corruption inside the organisation, as well as in relationships between the organisation and external parties.

Our business

STARCO is involved in manufacturing, sourcing, assembling and distribution activities primarily in European and Asian countries. We operate our own factories in both developed and developing countries, and have supply sources located mainly in the Asian region.

We are fully committed to implementing the same CSR Policy and Anti-corruption and Anti-bribery principles throughout our organisation; furthermore, we are working with external suppliers to ensure that they are aligned with the same principles.

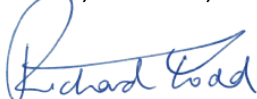
Policies and responsibilities

Internally, the responsibility of complying with the CSR Policy is held by top management and delegated further to middle and local management. We have an "open-door policy" throughout the organisation, where employees from all levels are able to raise their concerns and questions – both to local management and to executive management.

The corporate purchasing department and supply chain management are responsible for third-party compliance. Our supplier selection process includes a requirement to comply with STARCO's supplier Code of Conduct, which includes zero tolerance to corruption and bribery. It also urges suppliers to use reasonable efforts to promote compliance with the Code of Conduct amongst their own suppliers.

You can download and read our full CSR Policy at starco.com/CSR.

Aarhus, Denmark, 25 March 2017

A handwritten signature in blue ink that reads "Richard Todd".

Richard Todd, Chief Executive Officer, STARCO Europe A/S