

SKD026/B	07/21	RR
Next Review Date		06/25



## Business Ethics Policy

Stormking is committed to conducting all its business activities in an ethical manner; respecting our obligations under the law, supporting our employees in making ethical decisions about how they discharge their duties and making constant improvements in our environmental performance.

This policy applies to Stormking employees (staff, contract and temporary) and extends to all our business dealings and transactions in all countries in which we operate.

We will encourage the adoption of this policy amongst our business partners including contractors, suppliers and customers.

### **Policy**

Our Corporate Responsibility Policy sets out our commitment to operate responsibly and to engage with our stakeholders to manage the social, environmental and ethical impacts of both our activities and theirs. Our environmental and social policies are set out in dedicated policies.

### **Anti-Corruption**

Stormking does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company.

Employees have strict guidelines regarding hospitality and gifts accepted or offered, which are subject to managerial review. Stormking does not make direct or indirect contributions to political parties.

If any instance of bribery or corruption is identified, the company will take remedial steps immediately.

### **Training and communications**

This policy and relevant guidance will be communicated to employees across the Company through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.

### **Raising concerns and seeking guidance**

Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage.

SKD026/B	07/21	RR
Review Date		06/25



### **Monitoring and review**

The Stormking Corporate Responsibility Committee will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate.

### **Internal controls and audit**

Stormking has established mechanisms to maintain accurate records - available for inspection - which properly and fairly document financial transactions and agreements. Internal control systems are subject to regular audits to provide assurance that they are effective in countering corrupt practices.

A handwritten signature in black ink, appearing to read "Craig Cherry".

Craig Cherry

Managing Director