

CODE OF CONDUCT

1. POLICY STATEMENT

This statement is made on behalf of STR Limited (**STR**). Any references to 'we,' 'us,' or 'ours' shall be interpreted as references to STR, as the context requires.

Our Code of Conduct outlines the principles and guidelines that govern our interactions with our clients, candidates and suppliers ensuring transparency, fairness and respect for all parties in our supply chain whether this be in the United Kingdom or in our international dealings.

2. ABOUT THIS CODE OF CONDUCT

This Code of Conduct outlines the standard of professionalism STR expects from its employees, its contractors and all other representatives who provide services on its behalf, whether in the UK or overseas. It serves to provide a robust foundation for ethical business conduct. It also sets the expectations STR has of those with whom it engages in the course of its business dealings including its clients, its suppliers and all other parties that contribute to its business practice. We also recognise that it is not a replacement for sound judgement and does not cover every scenario we may face. Where we feel unable to make a decision of our own accord, STR provides a clear escalation process to provide both support and offer guidance.

3. WHO MUST COMPLY WITH THIS CODE OF CONDUCT

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, suppliers, other third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

4. OUR COMMITMENT

We are committed to delivering ethical, respectful and professional recruitment services to our clients, contractors and candidates. Our focus is always to **do the right thing**, holding firm to our collective commitment to complying with laws, regulation and internal policies. We:

- Have established guidelines and expectations for behaviour within STR. All of those engaged by STR, whether they be employees, contractors, suppliers or otherwise, must comply with relevant legislation, statutory and non-statutory requirements, official guidance, principles of best practice, and any such reforms to these requirements that arise in the course of providing their services. This Code of Conduct outlines the standards we expect from everyone working with our business and our commitment to upholding the highest standards of conduct and integrity in every interaction with our clients, candidates and colleagues. By defining acceptable and unacceptable behaviours, we aim to promote integrity, fairness, and mutual respect. These principles are crucial for building trust and maintaining the high standards of service that those we do business with expect from us and that we expect from them; and
- Strive to prevent misunderstandings and conflicts by always acting honestly and providing clarity and full transparency in all dealings with clients, candidates, and colleagues and at every stage of the recruitment process. Whether this be in our professional conduct, our clear and respectful language in all business dealings, our focus on fairness or our adherence to truth in advertising, we aim to ensure that all individuals feel valued, respected and understand the way we expect them to work; and

- Actively promote diversity, quality and inclusion not only within STR but also in our interaction with our clients and our candidates. We encourage the implementation of ethical business practices which align to the Environmental, Social and Governance (ESG) principles alongside ensuring we adhere at all times to both UK and international laws governing recruitment practice, anti-discrimination, data privacy, employment rights and health and safety. We provide guidance to others in our supply chain in respect of good diversity practice; all vital to our success and the success of those we serve; and
- Focus on accuracy and attention to detail to ensure that the representations that we make whether they be of the job roles and the culture of our clients or the qualifications and experience of our contractors/candidates are honest, fair and to be relied upon without hesitation; and
- Respect all working relationships. We ensure that our actions towards all parties are always fair and reasonable; that an individual's best interests, safety and privacy are respected and prioritised at all times and that healthy competition is encouraged and always to the benefit of all parties; and
- We act ethically, extending beyond our day-to-day responsibilities. We are accountable for our actions, whether at work or otherwise especially those that might affect our job performance or impact the reputation or business interests of STR. We actively encourage all parties to report where they observe any form of violation or scenario which makes them uncomfortable.
- Encourage the continual development and education of our employees, ensuring they are adequately trained and skilled to undertake their responsibilities and can demonstrate a high level of current and relevant professional knowledge.

5. ANTI-BRIBERY AND ANTI-CORRUPTION

We compete fairly, honestly and with integrity everywhere we do business around the world. We never attempt to gain an unfair business advantage through bribery, 'back-handers,' kickbacks or any form of corruption.

- We comply with the UK Bribery Act 2010, the U.S. Foreign Corrupt Practices Act (FCPA), and all other anti-corruption laws, rules and regulations applicable in the countries in which we do business; requiring the same of our business partners, contractors, and third parties.
- Those who represent us are prohibited from offering or accepting anything of value whether cash or otherwise in order to improperly influence a business decision. We also ask the same of all parties in our supply chain.
- All employees are expected to follow the guidelines set out in our Anti-Bribery and Anti-Corruption Policies and undergo regular training to ensure their knowledge remains relevant and fit for purpose.

6. MODERN SLAVERY

Modern slavery is a crime and violation of fundamental human rights. We are committed to upholding transparency within our business and throughout our supply chains and expect the same from those we engage with.

- All employees are expected to follow the guidelines set out in our Modern Slavery Policy and undergo regular training to ensure their knowledge remains relevant and fit for purpose.
- Our Modern Slavery Statement is available on our website and outlines STR's position and intolerance for any activity that violates the rights of another person whether vulnerable or otherwise.

7. DATA PROTECTION AND PRIVACY

STR maintains many information assets, including personal and sensitive information which are critical to doing business, keeping the trust of those we engage with and maintaining the reputation of our company into the future.

- We ensure compliance with all data protection laws whether in the UK or overseas as applicable to the territory in which we are providing our services, alongside all contractual obligations.
- We ensure all collection, storage locations, uses, sharing, transfers and disclosure of personal data are strictly controlled and protected.
- We ensure we have robust processes in place to mitigate the risk of a data breach and equally robust disaster recovery and business continuity procedure to mitigate any loss in the event a breach arises.
- All employees receive comprehensive training at the onset of their employment and throughout their career with STR to ensure their knowledge remains up to date and relevant and fundamental privacy and security principles are adhered to across the company.
- Our Privacy Policy outlines the foundation on which we collect, retain, use, minimise and delete personal data from individuals who engage with our business.
- All data protection queries are managed by STR's in-house Data Protection Team who also ensure STR upholds the privacy of all parties with whom they engage at all times. The team ensure all obligations are met, all policies maintained and updated, and all process including suppression and automation data minimisation are robust, monitored and updated in accordance with any reform.

8. CONFIDENTIAL INFORMATION

STR's information should only be used for company purposes and should not be disclosed to anyone outside of the company. Even within the company, only those individuals who truly need to know the information to conduct their business should have access to confidential information.

Confidential information includes things such as client, customer, and supplier information, strategic, business and marketing plans, internal company communications, and existing and future service delivery information.

All confidential information should be:

- stored in a secure place and not left where others can view it;
- clearly marked as confidential;
- not sent to unattended printers;
- not discussed in any form where unauthorised parties may be able to hear.

We ask all employees:

- not to bring any information from a previous employer; and
- to not accept anyone else's confidential information unless required by a specific business arrangement and then only subject to a pre-agreed confidentiality or non-disclosure agreement; and
- not solicit another party's confidential information unless required by a specific business arrangement; and
- to be transparent in reasons surrounding securing information in and about the marketplace; and

9. INTELLECTUAL PROPERTY

Anything created by an employee during their time with STR belongs to the company. This includes, but is not limited to, inventions, discoveries, ideas, improvements, software programs and contracts. These work products are STR property if they are created or developed, in whole or in part, on company time, as part of an employee's duties or through the use of company resources or information. Employees must promptly disclose to STR, in writing, any such work product and cooperate with the company's efforts to obtain protection for STR.

10. DIVERSITY

STR creates and promotes an environment that is inclusive of all people and their unique abilities, strengths and differences and promotes diversity as a strategic and competitive business advantage.

- STR and its employees respect diversity in each other and in all parties with whom they interact and are committed to acting fairly and with integrity at all times.
- STR employs a strategy of continual improvement; always seeking opportunities to explore new avenues to ensure that all of those with whom it engages feel they are equally represented and with access.
- Our dedicated Equality, Diversity, and Inclusivity (EDI) team works together to ensure that our policies, practices, and culture reflect our commitment to diversity and inclusivity.

11. CONFLICT OF INTEREST

We all have a duty to avoid situations that create a conflict of interest. A conflict of interest can occur when an employee or a family member has a personal interest, activity, or relationship that could interfere or appear to interfere with the employee's ability to make objective business decisions in the best interest of STR. Conflicts are not always obvious or easy to identify. Examples may include:

- Where an employee or a family member engage in activities that compete with STR's business interests, or appear to do so;
- An employee working for or providing a service (such as consulting or acting as a paid advisor) to a current STR supplier, customer, landlord, or competitor or entity one who seeks to do business with STR;
- An employee acting on behalf of anyone besides STR in a transaction with STR (for example, helping someone sell products and/or services to STR);
- Having an ownership or financial interest in a STR supplier, customer, landlord, or competitor.

If any employee has or becomes aware of a real or potential conflict of interest, they must promptly disclose it to STR's HR department. Many issues can be managed easily once they have been promptly disclosed.

All employees must avoid any activities or relationships that could create a conflict of interest.

12. FRAUDULENT ACTIVITY

We are dedicated to upholding the highest ethical standards in all business transactions, relationships and partnerships. STR prohibits all fraud including theft, corruption and financial and non-financial representation. It expects those with whom it engages to adopt a similar position and to work in collaboration to protect assets, implement safeguarding controls, encourage honesty and transparency in all business dealings and to comply at all times with relevant laws and regulations and to report any known or suspected misconduct.

We uphold a zero-tolerance policy towards all fraudulent activity and are committed to:

- preventing the facilitation of tax evasion, whether it occurs under the laws of the United Kingdom or any jurisdiction overseas;
- complying with the Proceeds of Crime Act 2002; and
- adhering to best practice at all times regardless of whether we have a statutory obligation. For example, STR is not authorised or regulated by the Financial Conduct Authority, so is not obligated to comply with the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017; nevertheless, we seek to mitigate risk where possible.

All employees must report any suspicious financial activities or transactions and must comply with all laws and regulations regarding financial crime.

13. Gifts and Entertainment

STR is committed to maintaining the highest ethical standards in all business transactions. STR defines a gift as an item offered or provided for which the recipient does not pay the full value. Gifts can come in many forms, including but not limited to gifts, entertainment, meals, hospitality, travel, discounts, and more.

Giving or receiving business gifts can often be customary and a way to express gratitude or build goodwill in business relationships. However, this must always be given careful consideration and should never be given or accepted if it might influence our professional relationships or business decisions, create a sense of obligation, or give the appearance of doing so.

All employees should always be aware of how accepting or offering a business gift might be perceived by the public, by other entities we do business with, and by STR itself.

If, an employee is offered a gift and are uncertain whether it is appropriate, they must refer to STR's HR department in the first instance for guidance. This must be done PRIOR to accepting anything

The above standards and policies stated herein do not represent all standards and policies applicable to STR nor are they a comprehensive or complete explanation of the laws that are applicable to STR and its partners in any particular country.

Breach of these standards, STR policies or the law may give rise to disciplinary action up to, and including, dismissal.

Any waiver of this Code of Conduct requires the prior written approval of STR's CEO or, in certain circumstances, the Board of Directors or a committee thereof.

The standards and policies discussed herein may be amended from time to time. Up to date copies shall be maintained on STR's internal HR system and as appropriate, on company websites.