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## **Starion Group Raising Ethical Concerns Policy**

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## 1 Introduction

The 'duty to report' is a fundamental mechanism within Starion Group that embodies our core principles of transparency, accountability, trust and ethical governance. It acts as a safeguard against unethical or illegal practices, enabling employees, contractors, freelancers and business partners to report breaches concerning Starion's ethical policies, nurturing a culture rooted in integrity and responsibility. This duty not only safeguards the interests of Starion but also ensures compliance with legislation and guidelines governing ethical standards.

## 2 Policy

At Starion we are committed to working to the highest ethical standards across our business operations and expect our staff to support these principles while working for the organisation. This policy encompasses the reporting of ethical concerns pertaining to breaches of Starion's Code of Conduct, Bribery and Fraud Policy, and other ethical policies or relevant legislation and regulations that also cover illegal and inhumane labour practices such as slavery and human trafficking.

Starion's staff have a duty to promptly report any potential breaches of these ethical standards, utilising the designated channels provided below. This includes matters concerning Starion, its staff or its business partners.

Staff should be confident that they can report ethical concerns in the knowledge that their reports will be taken seriously, treated confidentially and investigated appropriately. We ensure that staff reporting in good faith will face no retaliatory actions.

## 3 Application

All ethical concerns must be raised in good faith and can be reported confidentially through either an internal channel – through your line manager or the HR Department – or through the process described in the Whistleblowing Policy using the designated platform described therein. Staff members are encouraged to provide detailed descriptions when making reports, outlining the alleged unethical behaviour and individuals involved, and providing the basis of the allegation. Supporting documentary evidence, if available, should be included to facilitate a thorough investigation.

Although anonymous reports are accepted, it is usually more difficult to conduct effective investigations in such cases. Therefore, Starion encourages staff to provide their contact details when raising ethical concerns. This allows additional information to be gathered and points to be clarified during the investigation process, as and when necessary.

## 4 Channels of reporting

Reports of concern may be lodged by both internal staff and external partners through the designated process outlined in the Whistleblowing Policy. A link to the Whistleblowing platform is available on the Starion website and intranet. For more information, please refer to Starion's Whistleblowing Policy.