



STO Policy

Whistleblower Policy

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STO promotes a culture of openness, encouraging employees to report misconduct in good faith while ensuring protection and confidentiality for whistleblowers.

The Whistleblowers Policy at STO encourages employees, stakeholders, and the public to report concerns about fraud, corruption, or improper activities in good faith. It ensures protection against retaliation and mandates confidentiality, allowing disclosures to be handled with sensitivity. Anonymous reports may also be considered at the company's discretion, but attaching names is encouraged for credibility.



Whistleblower Policy

Purpose

The purpose of this Policy is to ensure employees are protected against any unfair or unjust treatment for disclosing concerns in good faith and to encourage employees, stakeholders and the public to make good faith reports of suspected fraud, corruption, or other improper activities, or health and safety concerns within the Company to appropriate officials and to describe the procedure that will be followed by the Company in evaluating and investigating such reports.

Effective date

Since October 2020.

Scope

This Policy applies to all employees of STO and STO Group of Companies. Law No. 16/2019 (Whistle Blowers Protection Act) shall be adopted as the main guideline to comply this Policy and Procedure.

Policy Statement

STO Group is dedicated to conducting its operations in alignment with its objectives and in full compliance with all applicable laws, regulations, policies, and procedures. The Group prohibits any form of malpractice by its employees or those of its subsidiary companies, fostering a culture of transparency, accountability, and integrity.

Each company within STO Group shall establish a detailed procedure to implement the core principles outlined in this Policy.



Whistleblower Policy Principles

4.1. This Policy allows employees to report concerns internally at a senior level and disclose information regarding malpractice or misconduct within the Company.

4.2. The Policy addresses concerns that may first be investigated independently but may subsequently lead to the use of additional procedures, including disciplinary actions. These concerns may include:

- a) Financial malpractice, impropriety or fraud;
- b) Failure to comply with a legal obligation or statutes

- or company policy and procedures;
- c) Dangers to health & safety or the environment;
- d) Criminal activity;
- e) Sexual harassment;
- f) Improper conduct or unethical behavior;

4.3. If an employee has a reasonable belief that any staff member, Group company, or employee of the respective company is involved in the aforementioned activities, they are expected to promptly report this information to their HOD or MD. If the employee feels uncomfortable reporting to the HOD or MD, they should report the matter

directly to the Board's Audit Committee, in accordance with the procedure outlined in this Policy.

4.4. The Company will work to foster an environment that encourages employees to fulfill their duty to report concerns and malpractices as outlined in company policies.

4.5. Opportunities must be made available for employees to raise concerns, and clear procedures must be established to address and manage these concerns.



4.6. Protection

- a. This Policy encourages the disclosure of information and ensures protection for employees who raise concerns, as long as the disclosure is made in good faith.
- b. Employees who knowingly submit false or misleading reports or do so without a reasonable belief in their accuracy, will not be protected under this Policy and may face disciplinary action.
- c. Retaliation against any employee who files a report or raises a concern under this Policy is strictly prohibited. Employees found to have engaged in retaliatory behavior or who fail to

maintain an employee's anonymity when requested may be subject to disciplinary action. Any employee who believes they have been subjected to behavior that violates this Policy should promptly report it to the appropriate authority.

4.7. Confidentiality

The Company will manage all disclosures with confidentiality and care. The identity of the individual reporting the concern may remain confidential, as long as it does not impede or hinder the investigation process.

However, during the investigation process, the source of the information may need to be disclosed, and the individual may be required to provide a statement as part of the necessary evidence.

4.8. Anonymous allegations

- a. This policy encourages individuals to include their name with any disclosures they make. Although anonymous concerns are typically viewed as less credible, they may still be considered at the Company's discretion. In making this decision, the following factors will be taken into account:



Whistleblower Policy Principles

- i. The seriousness of the issues raised
 - ii. The credibility of the concern
 - iii. The likelihood of confirming the allegation from attributable sources
 - iv. Untrue Allegations
- b. If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information.
- c. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.



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