STOREGGA

WE DO THE RIGHT THINGS WELL.

OUR CODE OF CONDUCT

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Revision Record

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04	04 December 2024	Annual review and update	KW/SH	ExCom	Board

WHAT'S INSIDE

STOREGGA

A MESSAGE FROM OUR CEO

WELCOME TO OUR CODE OF CONDUCT

We're proud of the culture that we are building here at Storegga, grounded in trust and mutual respect across our team. This Code is our guide to living by our values and supporting each other in making the best decisions.

Think of this Code as a helpful reference for upholding integrity, professionalism, and ethical behaviour in all we do. It's here to keep us aligned with our mission and core values: to be purposeful, accountable, courageous, and engaging. By following these principles, you're helping make Storegga a stronger, more resilient company that protects and supports all of us.

Building a strong reputation with our stakeholders–including employees, investors, governments, customers, contractors, partners and the communities we serve–is essential to maintaining our social license to operate. This Code plays a big role in driving Storegga's success and fostering that trust.

If you ever see something that doesn't sit right or have any doubts, don't stay quiet–please speak up. We'll handle your concerns appropriately and with strict confidentiality. Remember, Storegga does not tolerate retaliation of any kind–we are always ready to listen.

Thank you for reading, using, and embracing this Code to help build a positive, ethical culture and ensure a bright future for Storegga. We appreciate your dedication!

Tim Stedman

Chief Executive Officer

OUR MISSION
OUR VALUES

At Storegga, our mission is clear, and our values set the pace.

We are committed to being purposeful, accountable, courageous and engaged–our guiding values for making a lasting, positive impact and doing our part to shape a net zero future.

Each of us plays a role in upholding these values, helping to strengthen Storegga's reputation and drive our mission forward.

PURPOSEFUL: We are energised by our role in reducing CO_2 in the atmosphere, in a way that is sustainable and considers the well-being of future generations.

ACCOUNTABLE: Whether individually or as a team, we take responsibility for our actions and their impact on the environment, our colleagues, investors, and communities. Together, we aim to build a sustainable and thriving future.

COURAGEOUS: We face challenges and take bold steps toward our goals. Even in uncertainty, we stay committed to improvement and seek innovative solutions.

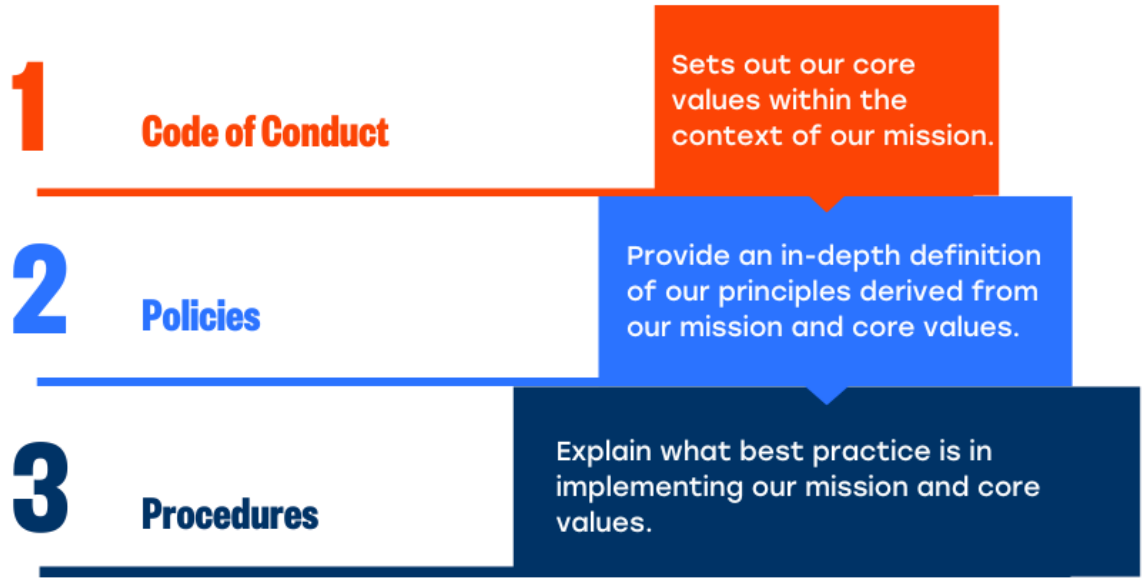
ENGAGED: We listen to our stakeholders with an open mind, ready to learn and remaining dedicated to progress.

How we act reflects who we are. By living these values, you'll find the guidance you need to uphold this Code and contribute to a brighter future for Storegga and the planet we share.

YOUR RESPONSIBILITIES

Why do we need a Code of Conduct?

This Code is for you. It provides you with the guidance and specific information on how you must act, in accordance with our mission and core values. It is the defining document youneed to adhere to and is the standard against which our stakeholders will judge us.



Who this Code of Conduct applies to?

This Code applies to everyone working at Storegga, including our Board, our management team and our entire workforce of employees across every location. We also expect our contractors, consultants and agents that carry out our business, or work on our behalf, or in our name, to conduct themselves in a way that is consistent with this Code.

How to use this Code of Conduct?

In this Code we have made certain commitments to our mission and core values and have set out our expectations from you to ensure that corresponding principles are maintained throughout our business.

Against each of the core principles, we have sought to set out what this means, how it translates into your business behaviour, where to find more information and how to raise a concern or seek further guidance. This Code is written in such a way that it provides useful guidance to all those acting on Storegga's behalf in a number of areas of business conduct.

YOUR RESPONSIBILITIES

Compliance with this Code

It is your responsibility to understand this Code, comply with it and read and comply with all policies and procedures referred to within it. Your activities must always be in line with our core values and principles. A breach of this Code carries disciplinary consequences up to and including dismissal or termination of contract. In some cases, Storegga may be required to report a violation to the relevant authorities, which could lead to legal action, fines and/or imprisonment.

Your opinion matters

This Code will be reviewed and updated as needed, to reflect the current issues and developments in the geographies in which we operate and enhance our practices. Accordingly, any feedback on this Code is welcomed.

Our commitment & your responsibility

We regard those who report concerns as acting in our interests. You have a duty to speak up and report, in good faith, any suspected breach of this Code, without any fear of recrimination. We foster integrity and excellence within Storegga and are open and accountable for our actions.

This Code does not cover every type of situation you may encounter. If you face a dilemma and are not sure how to resolve it, you can seek advice, guidance and support by raising it with your Line Manager, the Head of HR, the General Counsel & Company Secretary or the Compliance Officer.

Whistleblowing through Safecall

In addition to our internal process, we have engaged with Safecall, an independent, external provider to support the ability of individuals to raise concerns by “whistleblowing”. Safecall is a very experienced organisation currently providing whistleblowing services to many multi-national businesses. Our Whistleblowing Policy sets out how you should raise work related concerns and how you can report any concerns using Safecall.

THE ENVIRONMENT

At the heart of our mission

In line with our mission of **setting the pace for CO_2 reduction and shaping a net zero future**, we are committed to pioneering carbon reduction and removal solutions and driven by opportunities created by the net zero energy transition.

Our team is innovative, bringing together an understanding of emerging technologies and the risks and opportunities offered by the energy transition, all combining to maximise our potential.

These commitments drive our collective and individual activity.

Our operational footprint

Our collective commitment:

1. We will play an important part in helping the world reach net zero and strive to support the transition to a low carbon economy and the reduction of emissions in line with the U.N. Framework Convention on Climate Change (Paris Agreement). For our part, we have committed to having net zero operations by 2040.
2. We are committed to the goal of protecting the environment. We abide by all applicable laws, standards and procedures in managing environmental risks and minimising the adverse environmental impact of our operations.

Each of our individual commitment:

1. You must report any environmental incident, potential incident or near-miss as soon as you become aware of it.
2. You must take individual responsibility for your safety and that of co-workers and ensure all partnerships, contractors and business relations working on behalf of Storegga are compliant with our health, safety and environmental (HSE) standards.
3. You should be familiar with specific emergency response contingency plans to deal with potential environmental incidents.
4. You must ensure that your work complies with the Health, Safety and Environment Policy.

Additional Guidance:

Health Safety and Environment Policy

ESG Charter

GOOD BUSINESS

Licence to operate

Our collective commitment:

1. We comply with all laws and regulations in the jurisdictions where we operate. Such compliance is critically important to our success, ethical integrity and licence to operate.
2. We aim to listen to and engage with local communities where we do business, and are developing projects as valuable stakeholders, with the aim of contributing to local economic development.
3. We strive to maintain a positive reputation, listen to and engage with the local community and to identify opportunities for contributing to local economic development.

Each of our individual commitment:

1. You are expected to be familiar with, and comply with the laws, regulations, policies, standards and procedures that are relevant to your role.
2. If you believe that any conduct or course of action raises a compliance issue or you have doubts about the interpretation of any law, rule, regulation or policy, you must raise the matter with the General Counsel & Company Secretary or the Compliance Officer immediately.
3. If you breach any law or regulation, in addition to breaching this Code and facing disciplinary consequences up to and including dismissal or termination of contract, you may also be fined and/or imprisoned.
4. You should identify the local communities that are impacted by your business activities and behave respectfully in line with all local sensitivities.

OUR COMMITMENTS

GOOD BUSINESS

Conflicts of interest

Our collective commitment:

1. No business dealings on behalf of Storegga should be influenced by personal considerations or personal relationships.
2. The perception of a conflict may be enough to negatively impact your reputation, as well as Storegga's.

Each of our individual commitment:

1. You should always be aware of potential conflicts, declare them at the earliest opportunity, whether or not you think that it will actually influence your decision, and seek to avoid them where possible.
2. You should seek advice from the General Counsel & Company Secretary or the Compliance Officer in advance about any issue where you have a potential or perceived conflict of interest or are otherwise unsure.
3. You must withdraw from any decision-making that creates an actual, potential or perceived conflict of interest.

Additional Guidance:

Ethical Business Standards and Anti-Bribery & Corruption Policy

What is a Conflict of Interest?

Conflicts of interest may arise from your personal relationships, participation in external activities or an interest in another venture, that could influence or be perceived by others to influence your business decisions for Storegga. An actual, potential or perceived conflict of interest may harm your reputation, as well as Storegga's. You must avoid actual, potential or perceived conflicts of interest, if possible.

A non-exhaustive list of conflicts of interest which are prohibited is below:

- Hiring, supervising, managing or setting the employment terms and conditions of any relative, business associate or close friend.
- Having an undeclared close personal relationship with someone who works for you or where you are able to influence their terms of employment, including (without limitation) salary and bonus.
- Contracting, on behalf of Storegga, with a e business that is managed or owned (wholly or partly) by you, a partner or a family member.
- Having a second job or other business engagement, without prior permission.
- Having an undisclosed direct or indirect ownership, or a personal interest, in any supplier or contractor of Storegga's.
- Not disclosing a conflict or potential conflict is a violation of this Code and will result in disciplinary action.

GOOD BUSINESS

Bribery, fraud and corruption

Our collective commitment:

1. We build relationships based upon trust and are determined to maintain and enhance our reputation. Storegga does not tolerate any act involving bribery, fraud, corruption, dishonesty or deception. No one working for Storegga will offer, give or receive a bribe or facilitation payment or commit an act of fraud under any circumstances either directly or through a third party in connection with our business.
2. We are committed to acting with honesty, transparency and integrity in all our business dealings and upholding all applicable laws and regulations.

Each of our individual commitment:

1. You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain a business advantage. You must not allow anybody else to do so on your behalf.
2. You must not make facilitation payments. If a facilitation payment has been requested or made, you must report it immediately to your line manager, the General Counsel & Company Secretary or the Compliance Officer.
3. You must not commit any act of fraud.
4. Know who you are doing business with by conducting appropriate due diligence as set out in the Third Parties Policy.
5. You must read and follow Storegga's Ethical Business Standards and Anti-Bribery & Corruption Policy and associated policies and procedures.
6. You should undertake all mandatory training in a timely manner.
7. You must notify the General Counsel & Company Secretary or the Compliance Officer if you believe you, or a colleague, has been asked to make or receive a bribe or a facilitation payment or you suspect any fraudulent activity.

Additional Guidance:

Ethical Business Standards and Anti-Bribery & Corruption Policy

Gifts and Hospitality Policy

Sanctions Policy

Third Parties Policy

GOOD BUSINESS

Bribery, fraud and corruption

What is bribery?

When you offer to pay, or seek to accept, a payment, gift, hospitality or favour, in return for which you improperly influence a business outcome, it is considered to be bribery.

Furthermore, bribery and corruption can include, but are not limited to, cash payments, gifts, hospitality and favours given to government officials or other individuals, with the intention of influencing such person may be considered a bribe.

What is a facilitation payment?

A public official may offer to speed up or fast track a process that is such public official's duty to perform, in return for a payment. Such payments are known as facilitation payments and are illegal under UK law, regardless of where the activity takes place.

OUR COMMITMENTS

GOOD BUSINESS

Gifts and hospitality

Our collective commitment:

1. No one will, in connection with our business, offer, supply or accept gifts or hospitality which are intended or can reasonably be viewed as a bribe or an attempt to influence business decisions.

Each of our individual commitment:

1. You must not, either directly or indirectly, offer, give, seek or accept illegal or inappropriate gifts and hospitality.
2. You must not allow gifts and hospitality to influence your business decisions or cause a perception that it has influenced your decisions.
3. You must read and follow Storegga's Gifts & Hospitality Policy and contact the General Counsel & Company Secretary or the Compliance Officer for any guidance.
4. You must promptly record all gifts and hospitality given or received and seek pre-approval, where required, in accordance with the Gifts & Hospitality Policy.
5. You must report any failure to record a gift or hospitality received or given by you, or a colleague, to the General Counsel & Company Secretary or the Compliance Officer.
6. Any potential breaches of the Gifts & Hospitality Policy must be reported.

When is a gift or hospitality, given or received, a bribe?

Even a suggestion of corruption can have serious consequences for both Storegga and you. If a gift or benefit has been given or received for the purpose of influencing a decision or an outcome, a criminal offence under the UK Bribery Act 2010 may have been committed. If gifts and hospitality given or received influences your business decisions or places an obligation on you or Storegga to secure a certain outcome, it could be considered to be a bribe or corruption.

The financial amount involved may

Additional Guidance:

Ethical Business Standards and Anti-Bribery & Corruption Policy

Gifts and Hospitality Policy

GOOD BUSINESS

Information management

Our collective commitment:

1. We depend on the use and exchange of information. We need to ensure that we use this information responsibly and protect it, especially when it comes to commercially sensitive information and competitively sensitive information, both our own and that of others. It is integral to our ability to deliver on our strategic objectives and honour our commitments to stakeholders.

Each of our individual commitment:

1. You are responsible for complying with our data and information management protocols and procedures, including in relation to competitively sensitive information and commercially sensitive information.
2. You are also responsible for protecting and securing all confidential information relating to Storegga and this obligation continues even after you leave your employment with the company in accordance with your employment contract.
3. If you are working with third parties, you must ensure that you are authorised to share information before doing so.
4. If you have been instructed to preserve information, you must ensure that it is kept as directed.

Additional Guidance:

Your employment contract or terms of engagement

Competition Law Compliance and Counterparty Engagement Protocol (including the full definition of **competitively sensitive information**)

Communications Policy (including the full definition of **commercially sensitive information**)

GOOD BUSINESS

Disclosure and communications

Our collective commitment:

1. All communications made to the public on behalf of Storegga are subject to disclosure requirements and accordingly must be cleared by the Head of Communications & External Affairs, and in certain cases the General Counsel & Company Secretary. Appropriate disclaimers must be used, especially when the communication contains forward looking information.
2. Every communication made to the public must be accurate, not misleading and in compliance with all applicable laws and regulations.

Each of our individual commitment:

1. You must not disclose any non-public information relating to Storegga or its business without the prior written approval of the Head of Communications & External Affairs or a member of Legal. This applies to things that you say, as well as anything in writing.
2. Even in cases where express permission is granted or a confidentiality or non-disclosure agreement is executed, the amount of confidential information shared should be limited to that which is required for a legitimate business purpose.
3. You should not disclose any commercially sensitive information to third parties without a valid confidentiality agreement in place or with the prior approval of a member of ExCom or internally outside of established 'clean teams' where they exist, without the prior approval of the applicable head of team or a member of Legal.
4. Do not disseminate any information on Storegga or its business on any of Storegga's social media pages or other media without the prior approval of the Head of Communications & External Affairs.
5. You should refrain from making public statements of personal opinion regarding Storegga or its business.
6. If you are speaking on behalf of Storegga, you must seek prior approval from the Head of Communications & External Affairs.
7. You must not engage with the media on behalf of Storegga without disclosure clearance from the Head of Communications & External Affairs.

Additional Guidance:

Your employment contract or terms of engagement

Communications Policy (including the full definition of **commercially sensitive information**)

GOOD BUSINESS

Competition / Anti-trust

Our collective commitment:

1. All communications made to the public on behalf of Storegga are subject to disclosure requirements and accordingly must be cleared by the Head of Communications & External Affairs, and in certain cases the General Counsel & Company Secretary. Appropriate disclaimers must be used, especially when the communication contains forward looking information.
2. Every communication made to the public must be accurate, not misleading and in compliance with all applicable laws and regulations.

Each of our individual commitment:

1. You should limit the sharing of any competitively sensitive information to the ring-fenced group which is permitted to receive such information.
2. Report suspected competition law infringements or failures to the adhere to the Competition Law Compliance and Counterpart Engagement Protocol to a member of Legal.
3. Leave any meeting with competitors at which competitively sensitive information and other anti-competitive topics are discussed, voice your objections, and follow up with a member of Legal.
4. Remember that merger control approval may be required for corporate acquisitions or joint ventures and seek advice from a member of Legal.
5. Seek advice from a member of Legal in the event of any uncertainty as to whether a proposed action is compliant with competition law, and prior to any new discussions with competitors.
6. Ensure that any information exchanged with competitors and other third parties is limited to what is necessary for legitimate business purposes.
7. Contact a member of Legal before discussing or disclosing competitively sensitive information, or afterwards, if you have inadvertently done so.
8. Don't agree to fix or align prices with any competitors or agree or allocate particular markets or customers with any competitors.
9. Don't disclose any competitively sensitive information without a valid confidentiality agreement in place and there must be no migration of such information from one joint venture to another.
10. Don't distribute any legal documentation without the prior approval of a member of Legal.

Additional Guidance:

Competition Law Compliance and Counterparty Engagement Protocol (including the full definition of **competitively sensitive information**)

GOOD BUSINESS

Information and communication technology (ICT)

Our collective commitment:

1. We provide you with IT equipment and services so that you can conduct your work in a secure and compliant manner.
2. Everyone is responsible for exercising good judgement regarding appropriate use of information and ICT resources.

Each of our individual commitment:

1. You must read, understand and adhere to the guideline set out in Storegga's ICT Acceptable Use Policy and ICT BYOD Use Policy.
2. You must ensure that security and confidentiality of Storegga ICT equipment is maintained, both in the workplace and when working remotely.
3. You must safeguard your ICT equipment outside of the office, including protecting commercial copyrights and personal privacy.
4. Ensure your personal use of Storegga's ICT will not incur costs to Storegga or negatively impact on your productivity.
5. You must ensure your use of ICT does not expose Storegga to potential liability or breach of confidentiality.
6. You must not misuse any Storegga ICT equipment or services, including group email services, internet services or mobile computing services.
7. You must ensure all communications reflect the culture and behaviours of Storegga and are in line with policies, procedures, and applicable laws and regulations.
8. You should undertake all mandatory ICT training in a timely manner.
9. You must inform the person responsible for IT, the General Counsel & Company Secretary or the Compliance Officer, immediately if you become aware of unauthorised or inappropriate use of ICT.
10. Failure to comply with Storegga's policies and procedures carries disciplinary consequences up to and including dismissal or termination of contract.

Additional Guidance:

ICT Acceptable Use Policy

ICT BYOD Use Policy

Privacy Policy and Privacy Notice

GOOD BUSINESS

Anti-money laundering and anti- tax evasion

Our collective commitment:

1. Money-laundering occurs when the proceeds of crime are hidden in legitimate business dealings, or when legitimate funds are used to support criminal activities. All companies are at risk of being exploited in this way, including Storegga. So, we must all be vigilant.
2. Storegga is committed to complying fully with all relevant anti-money laundering and anti-tax evasion laws and regulations in the countries in which we operate and has zero tolerance for corrupt or illegal practices.

What is money laundering?

Money laundering involves dealing with the proceeds of crime. This may include legitimate business deals that use money originating from criminal activity or where legitimate funds are used for criminal activities like financing terrorism.

Each of our individual commitment:

1. You must follow our due diligence requirements so that we know who we are doing business with.
2. If you are suspicious of any activity or are concerned that Storegga is at risk of dealing with the proceeds of crime or of committing a tax evasion offence, you should report the matter immediately to the General Counsel & Company Secretary, the Compliance Officer or via Storegga's Whistleblowing Policy and should not proceed with any transactions relating to these concerns until they have been resolved.
3. It is a criminal offence to facilitate UK or foreign tax evasion by another person and the business may commit an offence if it does not have in place adequate procedures to prevent it.
4. You should undertake all mandatory training in a timely manner.

Additional Guidance:

Anti-Tax-Evasion Facilitation Policy

Ethical Business Standards and Anti-Bribery & Corruption Policy

Third Parties Policy

PEOPLE

Health and Safety (H&S)

Our collective commitment:

1. Safety comes first. The health and safety of our people and those we work with is paramount and a foundation to a thriving work environment. Accordingly, we commit to providing a safe and secure working environment, which will allow us to achieve excellent H&S performance.
2. We must be vigilant and always look out for one another.

Each of our individual commitment:

1. You should always operate to the highest standards of safety. You have a responsibility to be aware of potential health and safety risks, to take reasonable measures to reduce these, and be continuously vigilant and support those around you to ensure their safety.
2. You should report any health and safety incident immediately.
3. Be prepared to stop your, or others, work if you feel it is unsafe; always speak up if you witness an unsafe act or unhealthy working environment.
4. Never undertake work you're not qualified to do.
5. You should never conduct work if you feel your performance is impaired.
6. You should be familiar with the emergency procedures where you are working.
7. Always conduct your work, including travel, in line with the health, safety and standard operating policies and procedures where you are working.
8. Always be aware of the risks associated with your work and plan ahead to mitigate those risks.
9. You should undertake all mandatory HSE training in a timely manner.
10. If you observe an unsafe act or identify an opportunity to improve Storegga's day to day safety, you must report it to the H&S team who will follow up with action as required. If you observe any potentially dangerous working situation, you have a duty to immediately stop the work until it is safe.
11. Engage with third parties, contractors, and suppliers to deliver a high standard of HSE performance.

Additional Guidance:

Health, Safety and Environment Policy

OUR COMMITMENTS

STOREGGA

PEOPLE

Human rights

Our collective commitment:

1. Storegga recognises the importance of combatting modern slavery and human trafficking and respecting and upholding human rights wherever we do business. It supports our licence to operate.
2. We are committed to maintaining the fair and equal treatment of all of our employees and contractors, without discrimination, and requiring the same standards to be upheld within our supply chain.

What do we mean by "human rights"?

Human rights are the basic freedoms that everyone should be entitled to regardless of matters such as religion, race, sex, gender, age, disability or sexuality and other diverse matters. Respecting human rights wherever we operate is clearly linked to achieving our overall business aims and objectives. While it is the role of Government in each country to protect the human rights of its citizens, we play a role in upholding human rights by our own actions in the countries in which we do business.

Each of our individual commitment:

1. Do not violate any anti-slavery or human trafficking laws or regulations, or the human rights of any individual or group of individuals.
2. Ensure you have a thorough understanding of any modern slavery, human trafficking and human rights issues where you are working and act in a way that does not exacerbate existing situations.
3. Always act responsibly to eliminate any adverse impacts of your behaviour on the rights of others.
4. Report any suspected modern slavery, human trafficking or human rights abuse, either in Storegga's own operations or in that of our business partners or other stakeholders, to the General Counsel & Company Secretary or the Compliance officer.

Additional Guidance:

Anti-Slavery & Human Trafficking and Human Rights Policy

Modern Slavery Transparency Statement

OUR COMMITMENTS

STOREGGA

PEOPLE

Equality, diversity and inclusion

Our collective commitment:

1. Our people are key to Storegga's success. Our aim is to achieve greater equality, diversity and inclusion for our workforce.
2. We believe in the value of diversity, and the need to harness its potential to build an environment where people are connected and belong. We believe this is not just a matter of principle but effective business practice.
3. We are committed to providing an environment free of discrimination and bias, where everyone has an opportunity to maximise their potential, fully participate in creating business success and where each person is valued, respected and supported for their attributes, skills and experience.

Each of our individual commitment:

1. When making employment decisions, including hiring, evaluation, promotion, training, development, discipline, compensation and termination, you must base them solely on objective factors, including merit, qualifications, performance and business considerations.
2. You should understand the value in diversity and must not discriminate in any way based on race, colour, religion, age, sex, gender identity, sexual orientation, marital status, disability, ethnic origin, nationality or any other characteristic protected by applicable laws.
3. Ensure you treat everyone fairly and equally.
4. Be respectful of cultural differences.
5. Raise any concerns about the treatment of others to your Line Manager or a member of the HR team.
6. Help create a respectful and supportive working environment.
7. You should undertake all mandatory training in a timely manner.

Additional Guidance:

Equality, Diversity & Inclusion Policy

PEOPLE

Workplace conduct

Our collective commitment:

1. We are committed to maintaining a work environment that encourages mutual respect and professionalism and is free from all forms of bullying and harassment, including sexual harassment and other forms of inappropriate behaviour. These behaviours will not be tolerated.
2. Harassment or other inappropriate behaviour of any kind will not be tolerated. Our aim is to prevent any harassment, including sexual harassment, and bully from occurring. Our policies are in line with this approach.
3. We are committed to equal opportunities and creating a fair work environment where everyone can thrive.
4. **Feedback, criticism and challenge must always be delivered in an appropriate and respectful manner.**

Each of our individual commitment:

1. Treat people with respect and courtesy at all times.
2. Respect each other's privacy.
3. Avoid any offensive comments or behaviour.
4. Listen to others and respect the opinions of others.
5. If you believe you have been the subject of harassment or other inappropriate behaviour, you should: (i) consider making the person aware of the impact of their behaviour and ask them to stop; and (ii) if the harassment or inappropriate behaviour continues, you should raise it with your Line Manager or a member of the HR team.
6. If you have been the subject of sexual harassment, you can also informally speak with a Sexual Harassment Prevent Champion.
7. If you are concerned about sexual harassment or any other forms of harassment or bullying, either of yourself or anyone else, we do encourage and expect you to report it.

Additional Guidance:

Sexual Harassment Policy

Disciplinary & Performance Management Policy

Grievance Policy & Procedure

PEOPLE

Workplace conduct

What is harassment?

Harassment is any uninvited, unwelcomed or unreciprocated behaviour that is likely to offend, humiliate or embarrass another person. Behaviour such as making insults or telling jokes of a racial, ethnic, religious, disability-related, age-related or sexual nature could be considered harassment.

If the effect of your behaviour causes offence, your intentions may be irrelevant, and your behaviour could be considered to be harassment.

What is sexual harassment?

Sexual harassment is defined as unwanted conduct of a sexual nature which has the purpose or effect of either violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to sexual harassment, and a person can be sexually harassed by someone of the same or a different sex.

It also includes treating someone less favourably because they have submitted or refused to submit to unwanted conduct of a sexual nature, or conduct that is related to sex or gender reassignment, and the unwanted conduct has the purpose or effect set out above.

PEOPLE

Personal Information

Our collective commitment:

1. Data privacy laws safeguard our personal data. We respect privacy rights and are committed to managing personal data in a professional, lawful and ethical way.
2. We may only process personal data for legitimate purposes and the data must be accurate and relevant for the purpose for which it was collected, as well as properly protected from inappropriate access or misuse. If we do not comply with these requirements, we risk causing harm to the individuals concerned and could face fines or litigation.
3. All personal information must be used only for the purpose it was obtained for and only disclosed on a need-to-know basis. Storegga will ensure that it complies with all applicable data protection and privacy laws and regulations.

Each of our individual commitment:

1. Ensure that only people with the appropriate responsibilities and authority have access to personal information.
2. Personal information should only be shared with third parties for agreed purposes that are related to the role of employment.
3. Everyone in possession of this information, as part of their role, should commit to ensuring that it is only used for legitimate business purposes.
4. Personal information should be obtained, held and shared in accordance with Storegga's Privacy Policy.

Additional Guidance:

Privacy Policy

Privacy Notice