



STM GROUP PLC CODE OF CONDUCT

November 2021



UK – GIBRALTAR – MALTA – AUSTRALIA – SPAIN

STM GROUP'S MISSION STATEMENT

STM Group Plc strives to be the provider of choice for cross-border investors, entrepreneurs and expatriates by offering clear, innovative and impartial financial and commercial solutions which help clients protect and grow their investments.

INTRODUCTION

The STM Group Board of Directors is committed to achieving the highest standards of corporate governance, integrity and business ethics. The Group's Code of Conduct (our "Code") sets out the values and behaviours that govern the way in which we, as STM Group employees, conduct ourselves in every aspect of our work. Trust and mutual respect among employees and externally need to be demonstrated every day and will secure our success into the future. The integrity of our Code rests in the hands of every individual in the Group.



STM GROUP'S PRINCIPLES OF CONDUCT

THE CODE COMPRISES THE GROUP'S PRINCIPLES OF CONDUCT WHICH ARE OUR BENCHMARK FOR ETHICAL BEHAVIOUR. THEY DRIVE OUR ACTIONS AND THEY UNDERPIN EVERYTHING THAT WE DO. ALL EMPLOYEES AND BOARD MEMBERS MUST KNOW AND FOLLOW THE PRINCIPLES ENSHRINED WITHIN OUR CODE AS FOLLOWS:

- We behave with professional integrity at all times. We treat those with whom we have contact in a fair and respectful manner and without discrimination and we encourage others to do the same.
- We observe all relevant laws and regulations within our jurisdiction. This means not only working within the law, but within the spirit of the law.
- We put our customers' interests at the heart of our decision-making. We earn their trust by understanding their needs and delivering excellent service to build long term and stable relationships.
- We actively listen to our customers and we deal with any complaints efficiently, fairly and with understanding.
- We treat our customers' information with the appropriate confidentiality and we carefully record the right information to help serve them and keep their records accurate and up to date.
- We are individually accountable for everything that we do and we act at all times with honesty, care and diligence.
- We act only within the limits of our personal competence and any limits of authorisation we may have.

STM GROUP'S PRINCIPLES OF CONDUCT (CONTINUED)

- We understand the impact our individual actions can have and we ensure that any actions we take, both inside and outside of work, do not harm the reputation of the Group or of any of our colleagues.
- We give fair and proper consideration and appropriate priority to the interests and requirements of our colleagues. We bring the best of ourselves to work and support one another working as one team to realise our full potential.
- We actively communicate both internally and externally and we do so in a clear, consistent, constructive and polite manner.
- We strive to develop and improve ourselves and encourage this in others, to achieve performance excellence and self-motivation, applying a “can do” philosophy to all of our business interactions.
- We do not partake in any illegal activities, either inside or outside of work, and we never engage in business that might be associated with criminal activities, bribery or corruption.
- We are fully transparent and judicious to ensure we have no conflicts of interest which could compromise our judgement. We will escalate any situation where we perceive there could be such a conflict to ensure it is managed appropriately.
- We preserve the integrity of all of the Group's confidential information, ensuring its safe-keeping through following information security procedures and good records management.

STM GROUP'S ORGANISATIONAL VALUES

Our organisational values describe the core ethics and principles which all of us at the STM Group abide by, at all times. They define the conduct, behaviours and standards which create the working environment and future we all want to experience and share. Our values shape, support and guide us with respect to the decisions we make individually and collectively as a Group.

Within the STM Group, we all comply with the Group's organisational values:



Having a Passion for Excellence



Taking Personal Responsibility



Striving for Business Success



Showing Care & Respect



Working Together

Colleagues are encouraged to speak up when we see conduct that falls short of expectations and goes against our Code. Our Whistleblowing Policy sets out the way in which we may do so in a confidential manner, which is fully supported by the Group.



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