ROL 0.500 CODE OF CONDUCT 2021



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1 ENSURING SUSTAINABLE BUSINESS CONDUCT

ROL AB hereinafter referred to as ROL, is committed to conducting its business according to high sustainable standards. Thus, the purpose of the Code of Conduct (also referred to as "the Code") is to ensure ROL's ethical and sustainable business conduct. The term "shall" in the Code is referred to as a mandatory requirement.

1.1 FOUNDATION OF THE CODE

The Code of Conduct is based on the Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against Corruption, as outlined in the ten principles¹ of the UN Global Compact.

1.2 SCOPE OF THE CODE

It is important that goods and services produced and handled by ROL are produced and provided in a sustainable way. Therefore, ROL expects the Code to be applied to and upheld by managers, board members, employees, workers, contracted workers, affiliates, and other contractual partners associated with or representing ROL, hereinafter referred to as ROL or "ROL employees".

1.3 LEGAL COMPLIANCE AND THE CODE

ROL complies with the local laws and regulations of each country in which we operate. The Code sets up a minimum requirement for sustainable business conduct. If provisions in national, regional laws, regulations or rules in the country or countries of operation provide a more stringent position to the standards set forth in the Code, such legislation shall prevail. In cases of conflict between this Code and a mandatory local regulation, the local regulation shall be given precedence.

1.4 IMPLEMENTATION AND RESPONSIBILITY

ROL requires all employees as stated in the scope of the Code to:

- Read and understand the Code of Conduct.
- Sign and date a written acknowledgement that they have read the Code.
- Ensure that both the content and the spirit of the Code are understood and acted upon.
- Comply with the Code at all times, and to inform ROL managers if these standards are not achieved.

ROL HR is responsible to make sure that ROL employees have read and signed the Code. Managers are responsible for the daily implementation of the Code. It is the duty of all ROL employees to maintain these standards at all times and to inform to senior managers of ROL in case of any deviances. The main responsibility to update the Code is held by Board of Directors.

It should also be clear that ROL is from time to time subject to audits, inspections and standards reviews in our workplaces, our manufacturing plants, our distribution centers and our information systems. ROL shall in these cases always act compliant and ensure that relevant senior managers at ROL are informed.

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¹ The ten principles of the UN Global Compact are found in Appendix 1



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2 TREATING PEOPLE WITH RESPECT

Internationally recognized human and labor rights shall be protected and respected at all times. ROL is responsible for ensuring that they do not directly or indirectly violate human rights or labor rights.

2.1 FAIR WORKING CONDITIONS

No one shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. Disciplinary measures such as monetary deductions are not permitted.

All forms of forced, compulsory or illegal labor is prohibited including exploitation of vulnerable groups such as migrant workers. This applies to ROL's operations and in the supply chain.

ROL shall not use employment arrangements in a way that deliberately does not correspond to the genuine purpose of the law. This includes - but is not limited to - (a) apprenticeship schemes where there is no intent to impart skills or provide regular employment, (b) seasonality or contingency work when used to undermine workers' protection, and (c) labor only contracting. Furthermore, the use of sub-contracting may not serve to undermine the rights of workers.

Employees shall not be required to lodge deposits or original identity papers with their employer or recruitment agent as a condition for employment. Employees shall be allowed to move freely at the workplace without supervision and have the possibility to leave the premises outside of working hours.

Employees shall have Agreements with the company and the terms of those agreements shall be in accordance with local legislation. In the event that no agreement is found to be in place, the company shall seek to establish one with the Employee as soon as is practicable. During any period where there is no Agreement in place the Employee shall not work more than 48 hours per week, overtime shall be exceptional, voluntary, paid at a premium rate of not less than one and one quarter times the regular rate and shall not represent a significantly higher likelihood of occupational hazard, and overtime shall not exceed twelve (12) hours per week unless a bargaining agreement states otherwise. Employees shall be given at least one day off in every seven-day period and have sufficient time to rest between shifts.

Annual leave shall be afforded to each employee. Employees are entitled to at least two weeks of paid annual vacation. Sick leave and parental leave shall be permitted and paid for in accordance with the national legislation or regulation in the country of operation. Efforts shall be made to support employees in their roles as parents or caregivers, especially with regard to migrant and seasonal workers whose children may be left in the migrants' home towns.

All employees shall have contracts, in languages understandable to the employee, specifying the terms of employment including working hours, overtime compensation, wage, frequency of payment and notice period. Overtime shall be compensated at the legally required rate. Employees are free to terminate their employment and leave work after reasonable notice has been given.

All disciplinary procedures must be established in writing, and are to be explained verbally to workers in clear and understandable terms.

In countries where there are no collective bargaining agreements, or where wages are not determined based on such agreements, all employees shall be paid a living wage. The living wage should be sufficient to cover the basic needs of the employee and the needs of the employee's family, and provide some discretionary income. Partial payment in the form of allowance "in kind" is accepted in line with ILO specifications. The level of wages is to reflect the skills and education of workers and shall

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refer to regular working hours. Wages are to be paid in a timely manner, regularly, and fully in legal tender. Deductions will be permitted only under the conditions and to the extent prescribed by law or fixed by collective agreement.

No person shall be employed who is below the minimum legal age for employment. Children under the minimum working age established by local law or fifteen (15) years, whichever is greater, shall not be used as labor force. Employees under eighteen (18) years shall not be engaged in hazardous or heavy work, or on night shifts. Young workers shall be protected against conditions of work which are prejudicial to their health, safety, morals and development, without prejudice to the specific expectations set out in this principle. Young workers' working hours shall no negatively impact their attendance at school, their participation in their participation in vocational orientation approved by the competent authority or their capacity to benefit from training or instruction programs. Young workers' access to effective grievance mechanisms and to Occupational Health and Safety trainings schemes and programs shall be ensured.

Robust age-verification mechanisms shall be part of the recruitment process, which may not be in any way degrading or disrespectful to the worker. This principle aims to protect children from any form of exploitation. Special care is to be taken on the occasion of the dismissal of children, as they can move into more hazardous employment, such as prostitution or drug trafficking. In removing children from the workplace, business partners should identify in a proactive manner, measures to ensure the protection of affected children. When appropriate, they shall pursue the possibility to provide decent work for adult household members of the affected children's family.

The rights of employees to freely associate and to bargain collectively, in accordance with the laws of the countries in which they are employed, shall be recognized and respected. In countries here trade union activity is unlawful or where free and democratic trade union activity is not allowed, internal initiatives to enable employee representation shall be implemented. Employees shall be allowed to freely elect a representative with whom the company can enter into dialogue with about workplace issues. business partners shall respect this principle by allowing workers to freely elect their own representatives with whom the company can enter into dialogue about workplace issues.

2.2 CONFLICT MINERALS

If products containing tin, tungsten, tantalum, gold and/or cobalt are handled by ROL, its affiliates and/or partners shall have a strict policy in place to ensure the origin of the minerals and that the extraction and/or processing of the minerals has not contributed to human rights violations or funded armed groups in conflict-affected and high-risk areas. The policy should be based on the OECD Conflict Mining Guidelines and should include, in addition to the regulated minerals, all mineral resources extracted in conflict-affected and high-risk areas according to OECD Extended Definition.

2.3 NON-DISCRIMINATION

ROL regards diversity as a basis for a sound workplace. ROL shall be equal in its practices and recruitment when looking objectively at our business, our employees and our partners.

ROL shall ensure equal treatment in its practices and recruitment. Discrimination, whether active or by means of passive support, whether based on ethnicity, national origin, religion, disability, gender, age, sexual orientation, HIV/AIDS status, marital or parental status, pregnancy, union membership,

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political affiliation or other grounds recognized under ILO conventions or national law in the country or countries of operations, is not accepted.

2.4 OCCUPATIONAL HEALTH AND SAFETY

ROL shall ensure a safe and healthy work environment, both physically and mentally. A detailed risk assessment shall be established where occupational hazards have been listed and preventative measures have been taken. Adequate fire safety shall be ensured in all workplace operations and there shall be reasonable number of fire extinguishers, clear evacuation routes, emergency preparedness plans and first aid kits at the workplace. Safety instructions, evacuation drills, fire safety, first aid training and work specific training shall be documented and provided regularly in a language understandable to the employees. Employees are free to exit the premises from imminent danger without seeking permission. Injuries and accidents occurring at work shall be logged, investigated and preventative measures shall be introduced. Adequate effective personal protective equipment shall be identified and provided to employees free of charge. Adequate occupational medical assistance and related facilities shall be ensured.

Information and training are to be provided to employees including, but not limited to: fire safety, handling of chemicals, work tools/machinery, hazardous waste, emergency awareness and first aid.

All premises shall be clean and safe. Employees shall have ready access to safe drinking water, free of charge, lockable and gender separated toilets and a sanitary place for food storage, separate from hygiene facilities. The facilities shall be well lit, ventilated and kept at acceptable temperatures and noise levels. Vulnerable individuals such as - but not limited to - young workers, new and expecting mothers and persons with disabilities, shall receive special protection. If the country of operation does not have a social security system that includes social benefits, employees shall nevertheless be protected in case of an accident and covered by an insurance.

If accommodation is provided, the supplier shall offer each employee a clean and healthy bed in gender-separated sleeping areas. Toilets and showers shall be provided, and the facilities shall at least meet the health and safety standards specified in the Code.

2.5 PRODUCT SAFETY

All products and services delivered to ROL shall meet applicable health and safety standards applicable to the function of the finished product.

3. CONSIDERATION OF THE ENVIRONMENT

ROL shall strive to minimize its negative impact on the environment and the climate. Thus, a precautionary approach towards environmental and climate challenges shall be applied. In order to ensure responsible production ROL shall continuously follow the environmental policy and program consisting of measureable targets and objectives, as well as regularly conduct risk assessments to prevent, mitigate and control the impacts of their operations.

3.1 ENVIRONMENTALLY FRIENDLY TECHNOLOGY

ROL should promote the development and use of environmentally friendly technologies and conduct business with as little impact on the environment and public health as possible.

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3.2 SUSTAINABLE USE OF RESOURCES

ROL and its suppliers shall use all resources, including raw materials and energy, responsibly and strive towards reducing the negative environmental impact by setting reduction targets and continuously monitoring materials and energy use. Renewable energy sources shall be prioritized and measures to increase the energy efficiency of operations shall be implemented, when possible. Biodiversity and ecosystem resilience should not be decreased due to the business operations.

Waste shall be seen as a resource in our long term strive to move towards circularity. Waste, hazardous and non-hazardous, shall be reduced, recycled, and reused to the furthest extent possible. Any waste that will be directed to disposal shall be treated according to the highest environmental and public health standards available.

3.3 WATER AND EFFLUENTS

ROL and its suppliers shall be responsible water stewards, especially in areas of water stress. Water shall be managed responsibly, and we shall strive to minimize our overall water consumption, which shall be monitored and measured. When possible, water shall be recycled in accordance with national legislation and the highest environmental standards. Wastewater and effluents originating from operations, industrial processes and sanitation facilities shall be monitored, controlled and treated before discharge or disposal.

3.4 EMISSIONS OF GREENHOUSE GASES AND AIR POLLUTION

ROL and its suppliers shall monitor, measure and control emissions from their operations with a specific focus on reducing greenhouse gas emissions. This includes choosing transportation methods with the least negative environmental impact and prioritization of renewable energy, when possible. Where operations could cause air pollution of contaminants harmful to human health and/or the environment, effective measure to control these should be employed.

3.5 CHEMICALS AND HAZARDOUS SUBSTANCES

Chemicals and hazardous substances shall be eliminated when possible or kept to an absolute minimum. When chemical or hazardous substances are used, suppliers shall ensure safe handling, storage and disposal of the substances. All substances shall be marked with Material Safety Data Sheets (MSDS) to ensure the protection of employees and the environment. Substances restricted or limited according to the European Union directives REACH and RoHS should be phased out according to the substitution principle.

Further guidance on environmental management can be found in ROL's Environmental Policy.

4. ANTI-CORRUPTION AND BUSINESS INTEGRITY

All forms of corruption are unacceptable to ROL. Corruption includes, but is not limited to: bribery, extortion, facilitation payments, nepotism and cronyism, fraud, money laundering, transfer mispricing, tax evasion or tax avoidance, market distortion, conflict of interest and unfair competition.

4.1 CORPORATE GOVERNANCE

ROL strongly believes in transparent and consistent corporate governance practices and abides with the applicable regulations and standards in each of its geographical markets.

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This protects the legitimate interests of all ROL colleagues, shareholders and stakeholders, including our customers and suppliers.

4.2 CONTRACTS AND AGREEMENTS

Our contractual relationships with suppliers and vendors, dealers and customers are important for business operations. Contractual agreements shall be in written form, signed by Authorized Representatives of all parties to the agreement, and contain clear Terms & Conditions.

Parties to any agreements involving ROL or its subsidiaries must be shown the Code of Conduct prior to signing any agreements. For supplier agreements, please refer to the Supplier Code of Conduct.

To avoid doubt, no employee of ROL is authorized to present themselves as having authority unless the employee offers a written confirmation of authority signed by a member of the management or a member of the Board of Directors of ROL AB.

It should be clearly understood by ROL employees and party we engage with, that any attempt to bypass rules stated in ROL's policies will be reviewed at the highest level of management at ROL and actions may result in termination.

4.3 BRIBES, FRAUD AND FACILITATION PAYMENTS

ROL employees or member of our Board of Directors shall not offer, ask, give or accept, directly or indirectly, any undue advantage for personal or professional gain from any third party, unless it can be constituted as being within the boundaries of accepted business practices such as representation and reasonable hospitality given in the ordinary course of business. ROL's internal guidelines state that:

- Gifts shall only be accepted on behalf of the company, and any employee that accepts a gift shall inform a senior manager
- No single gift or benefit should exceed the value of 50 Euro.
- ROL employees shall not offer money, gifts or benefits to an official or employee of a governmental entity.
- When in doubt, employees shall seek advice from their managers or ROL HR.

ROL employees shall not intentionally or deliberately act to deprive someone of money or property by deception or unfair means.

ROL does not accept direct or indirect unofficial payments made to secure or expedite a performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement.

4.4 FINANCIAL MALPRACTICES

ROL is firmly committed to free and fair competition in open markets. ROL respect and comply with all applicable competition laws, and shall not engage in any form of cartels, abuse of power, beneficiary services or market distortion. ROL shall further not engage in activities that may hinder the development of fair competition.

ROL will always look to operate in countries where governments, regulators and markets encourage free and fair competition. If ROL operates any business interests in markets that are not generally

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considered to be free and fair, ROL will take extra precaution to pursue behavior consistent with this Code of Conduct. ROL's employees is expected to maintain these standards at all times.

ROL shall always submit truthful and accurate tax declarations to tax authorities in all countries where ROL have operations. ROL will further not conduct transfer mispricing.

4.5 NEPOTISM, CRONYISM AND CONFLICT OF INTEREST

Business decisions are always to be made in the best interest of the company. All conflicts of interest that may compromise the Supplier's credibility at ROL's or external parties' confidence in ROL shall be avoided. If matters arise that could be perceived as conflict of interest, the Supplier shall be transparent and act responsibly.

Personal relations or considerations may never influence our decision-making. This includes not only potential gains for ROL's employees, but also for our relatives and friends or favoritism based on familiar and acquaintance relationships where someone in an official position exploits his or her powers and authority to provide a job. To avoid risk of conflict of interest the following applies:

- Employees may not, without the company's written consent, work outside ROL in any capacity (e.g. employment, consultancy, Board membership).
- If there is any risk, however small, for conflict of interest, employees are expected to immediately inform their manager who will then consult with ROL HR for guidance.

4.6 POLITICAL INVOLVEMENT

ROL observes neutrality with regard to political parties and candidates and abides with applicable international treaties and national legislation on lobbying activities.

4.7 CHARITABLE EVENTS

The ROL brand may in some circumstances be associated with charitable event, if this action has been approved by management, in writing and in advance of the event.

By extension, ROL does not permit employees to attach religious messages to any communications between ROL colleagues, suppliers, partners or any external parties.

5. FINANCIAL AND SUSTAINABILITY REPORTING

ROL is required to follow strict accounting principles and standards, to report financial information accurately and completely, and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with legislation.

Employees are required to follow these guidelines and seek immediate advice from ROL HR where issues are identified:

- Ensure that all transactions are properly recorded, classified and summarized in accordance with ROL accounting policies.
- No employee may enter or remove information in the company's books or records that intentionally hides, misleads or disguises the true nature of any financial or nonfinancial transaction or result.
- Employees involved in financial reporting shall always provide full, fair, accurate, timely and understandable disclosure in reports and documents that ROL files with, or submits to, government agencies, tax authorities and in other public communications.

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pricing.

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ROL follows the international guidelines and applies the national regulations relating to transfer

• Comments about financial reporting and prospects to external parties shall only be made by those authorized by the Board of Directors.

ROL is required to abide by legislation requiring ROL to annually disclose sustainability information in conjunction with its business model, stand on implementation of and results from sustainability policies. It is further requirement to publicly disclose information with regards to human rights, employees, social relations, environmental protection and prevention of anti-corruption. All ROL's employees must therefore provide relevant information to coordinating party upon request to facilitate the establishment of the sustainability report.

6. NON-COMPLIANCE

It is the responsibility of ROL's managers to make sure that both the content and the spirit of this Code are communicated, understood, and acted upon within their organizations and to encourage employees to reveal behavior that may be non-compliant with the Code. It is however the responsibility of all ROL employees to report any suspicion of deviances with risk of violation of the Code or explicit in-compliance immediately so that issues can be addressed.

6.1 WHISTLE BLOWING

Concerns can be filed in the following ways:

- A process in the ROL Management system under Governance
- ROL Whistleblower Policy, includes link to the Anonymous online reporting
- Call to +4636368800 and ask to speak to ROL HR

For anonymous grievances, ROL has set up a whistle-blower service with a trusted third-party provider with a commitment to fair treatment of information. The anonymous whistle blower function is available at https://report.whistleb.com/en/rol

6.2 INTEGRITY

When handling information, ROL shall take into respect our customers' rights to maintain integrity and privacy. Correspondingly, all employees' right to privacy and personal integrity shall be respected at all times. No one shall be subjected to arbitrary interference with his/her privacy, family, home or correspondence, nor to attacks upon his/her honor and reputation.

We handle all types of personal data that may occur in a report in accordance with the principles of the GDPR. For further guidance see ROL's Personal Data Policy.

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7. CONFIRMATION OF UNDERSTANDING

My signature below indicates that I, and understood the ROL Code of Conduct and that my conduct in deed.	-
Signature	Printed Name
	Country and date

This signed document will be stored on file by ROL HR.



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APPENDIX 1: FOUNDATION OF THE CODE OF CONDUCT

The code is based on the ten principles provided by the United Nations (UN) Global Compact. The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labor standards, the environment and anti-corruption. The UN Global Compact principles enjoy universal consensus and are derived from the Universal Declaration of Human Rights, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, the United Nations Convention Against Corruption.

Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

Labor Rights

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labor; Principle
- 5: the effective abolition of child labor; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

 Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

