



CODE OF CONDUCT

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1. The Röko code of conduct scope of application

1.1. This code:

- has been set forth to emphasise the basic principles that guide Röko AB's ("Röko") operations.
- shall guide the daily business of Röko employees in their relations with other employees, customers, suppliers and shareholders.
- establishes not only that Röko's response to international and national laws and regulations is one of compliance, but also that these laws set the minimum standards for our actions.
- implies that Röko and its employees shall act as responsible participants within the company's areas of operation in the building of a sustainable society. It therefore follows that Röko expects suppliers, agents, consultants and other business partners to adhere to these principles within their sphere of influence. These principles shall also be applied when assessing current and potential partners. The Code applies to the Board of Directors as well as all employees at Röko.
- has been set forth in light of and guided by the ILO Declaration on Fundamental Principles and Rights at Work, the OECD's principles and standards for how multinational companies and the UN Convention on the Rights of the Child and the UN Convention against Corruption.

2. The Röko code of conduct

2.1. Employees

Working environment: Röko strives to be an attractive employer by creating a working environment based on collaboration, responsibility and openness. The well-being of employees is a high priority, and the company is committed to providing safe and healthy working conditions. Employees must immediately report incidents, accidents or any behaviour in breach of this Code to their immediate manager.

Labour rights: Employees are recruited and promoted solely on the basis of their qualifications for the job, regardless of race, religion, age, national origin, gender, sexual orientation, political opinion, union membership, marital status or disability unrelated to the task in question. Röko does not tolerate any form of harassment or violence in the workplace, and the use of forced labour and child labour is strictly prohibited in all company operations. Further, products from suppliers and subcontractors that utilise child labour in their contracting, subcontracting or other relationships for the manufacture of their products shall not be accepted.



Compensation: Each employee shall be rewarded in a correct and fair manner in accordance with his or her individual performance and contribution to the success of the company.

The wages paid for a standard working week shall at least meet the legal or industry minimum standards and be sufficient to meet the basic needs of our employees. Labour hire agreements and apprenticeships shall not be undertaken to evade the Group's obligations to personnel under applicable laws, social security legislation and regulations.

Freedom of Association: All Röko employees shall have the right of free association. Röko shall respect the right of all unionised employees to bargain collectively. Röko shall, in those situations in which the right of freedom of association and collective bargaining are restricted under law, facilitate means of independent and free association and bargaining for all such personnel.

Conflicts of interest: No employee may be involved in an activity or hold a position outside Röko that is in conflict with the company's business interests. Such conflicts of interest could also include directorships, significant shareholdings or the employment of family members.

Employee consultation: Röko strives to maintain good communications with each employee through company information and consultation procedures, recognising the right of organisation for employees and the right to collective bargaining and agreements.

Whistleblowing service: Our whistleblower service provides an opportunity to report serious suspected misconduct against Röko's values and policies. Primarily, employees are encouraged to contact a manager in their organisation. If they feel they cannot be open with the information, we offer the opportunity to report concerns anonymously via the whistleblower service.

The whistleblower service is available on <https://report.whistleb.com/roko>.

2.2. Customers

Customer satisfaction: Loyal, satisfied customers are the basis of our reputation. Honesty and integrity in all dealings with customers are prerequisites for profitable, long-term business relationships. Röko will provide customers with accurate product information, and will only make commitments about our products or our company that we can live up to.

Product quality and safety: Röko is committed to providing products and services giving consistently high value, quality and reliability. Product safety is of the utmost importance. All Röko's products and services shall comply with relevant regulatory requirements in this respect. Our commitment to customer satisfaction also includes the provision of a high standard of after-sales service and prompt attention to customer concerns.



Gifts and favours: Gifts, entertainment, compensation and personal favours may be offered to a third party only if they are modest in value and consistent with customary business practice. No gifts, entertainment or personal favours may be offered in contravention of any applicable law or code of practice. Gifts that do not meet the above criteria should be reported to management, which shall determine what measures should be taken.

2.3. Suppliers

Gifts and favours: No employee should seek or accept any gift, entertainment or personal favour that might reasonably be believed to have an influence on business transactions. Gifts that do not meet the above criteria should be reported to management, which shall determine how the matter will be dealt with.

Human rights and environmental issues: Röko will inform business partners of the company's values and business principles. We will not do business with suppliers that fail to comply with applicable laws, do not uphold basic human rights or disregard environmental issues.

Conflicts of interest: As a supplier or intermediary of ours we always need you to avoid all conflicts of interest that may influence our business relationship.

2.4. Society and the environment

Legal compliance and local customs: Röko employees must comply with all the applicable laws and regulations of a country in which the company operates. In cases where a conflict exists between more restrictive laws and this Code's principles and values, the law shall prevail. We will respect the local traditions and customs of each country. In cases where there is a conflict between local customs and this Code's principles and values, the Code shall guide the employee's course of action. Anti-trust, fair competition and intellectual property: We always act in accordance with national and international competition laws and do not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors. When we do business, we do not take unfair advantage of anyone through manipulation, abuse of privileged information or misrepresentation of facts. We respect the intellectual property rights of others.

We shall never directly or indirectly facilitate money laundering or terrorism financing.

Community involvement and contributions: Röko strives for its business to positively and sustainably contribute to the community we operate in. Röko has zero tolerance for bribery, corruption, fraud, facilitating payments or attempts at any of these. We do not give anything of value, directly or indirectly, to any politically exposed person or business person, in order to get business deals or privileges. The company neither supports any political parties nor makes donations of political nature.



Environmental impact: Röko is committed to preventing or otherwise minimising and mitigating any harmful effects our operations or products have on the environment. We aim to reduce the environmental impact of products throughout their life cycles.

Export control and customs: We, as well as our suppliers and intermediaries, will always do our best to ensure compliance with applicable export control and customs regulations.

Sanctions: Röko employees must comply with all the sanction regulations issued by any of the United Nations, the European Union, the United States, any member state of the European Union and the European Economic Area, the United Kingdom (and/or any authority, official institution or agency acting on behalf of any of them in connection with sanctions). No Röko employee shall finance, do business or transact with any person that is (i) listed on any list published in connection with sanctions by aforementioned authorities, (ii) located or organised in any country or territory that is the target of comprehensive, country- or territory-wide sanctions or (iii) owned or controlled by a person referred to in (i)-(ii).

2.5. Shareholders

Communication with shareholders: Röko will provide accurate and timely information on the company's activities, performance and financial situation to all shareholders. Röko's accounting statements will present a true and correct view of the company's financial performance.

2.6. Lack of compliance

Any non-compliance by an employee, consultant or anyone else mentioned in this Code must be reported to the management of the concerned company. Reports on misconduct or harassment will be evaluated and followed up. Every case of violation of this Code will be evaluated and handled based on the severity of the violation. In the event of repeated or severe violation, Röko has the right to decide on appropriate actions, which can include termination. Compliance with this Code is reviewed yearly by the management and reported to Röko's Group CEO and Board of Directors.

2.7. Implementation and version history

This Code of Conduct applies to all staff and all Röko business activities, regardless of location. The Code sets out the main principles of corporate responsibility and cannot address all possible ethical dilemmas that may arise. It is intended to guide employees in how to act with integrity and good judgement at all times. Observance of the Code will be evaluated periodically at Group level. The Code will be regularly reviewed and amended as necessary.

Version	Change description	Date	Author
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001	New code	2022-05-24	Management Team
002	Amendment	2023-08-23	Management Team
003	Amendment	2024-05-08	Management Team
