



# Internal Code of Conduct

Ver 1.0

## Introduction

This Code of Conduct (hereinafter referred to as the code) applies to all entities of ROCA Industry AB and our subsidiaries (hereinafter referred to as "ROCA").

We are committed to conducting our business in a responsible and ethical manner, respecting the rights and dignity of all people and the environment. We expect the same from our suppliers and their subcontractors. This code outlines the minimum standards we operate by and requires our suppliers to comply with to do business with us. The code for our suppliers is available in a separate document, which is signed by all our main suppliers.

## Compliance with laws and regulations

We comply with all applicable laws and regulations of the countries where we operate, as well as with relevant international standards and conventions, such as the OECD Guidelines for Multinational Enterprises<sup>1</sup>, the UN Convention on Economic, Social and Cultural Rights, the UN Convention on Civil and Political Rights, and the ILO Conventions on Rights and Principles in Working Life.

## Respect for human rights

We respect and protect the human rights of our employees, customers, communities, and stakeholders in accordance with the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. This includes, but is not limited to, the following principles:

- **Freedom of association and collective bargaining:** We respect our employees' right to form or join trade unions and to bargain collectively without interference, discrimination, or retaliation. In countries where freedom of association is restricted, we strive to create an environment where the company management and employees can discuss salaries and working conditions in a non-threatening manner.
- **Elimination of forced or compulsory labor:** We do not use any form of forced, bonded, indentured, or involuntary labor or engage in human trafficking or slavery. Employees are free to leave their employment at any time without penalty or restriction. We do not require our employees to pay any deposits or retain their identity documents.
- **Effective abolition of child labor:** We do not employ or exploit children in any way that is harmful to their health, safety, education, or development. We adhere to the minimum age for employment and the prohibition of hazardous work for children, as defined by the ILO Conventions No. 138 and No. 18286. Young employees (below the age of 18 years) may only be employed in non-hazardous work.
- **Elimination of discrimination:** We do not discriminate against any employee or applicant based on race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. We ensure equal opportunity and treatment in all aspects of employment and occupation.
- **Safe and healthy working environment:** We provide a safe and healthy working environment for our employees in accordance with national laws and regulations and relevant ILO standards. We take appropriate measures to prevent accidents, injuries, and illnesses and protect employees from hazardous substances or conditions. We also respect our employees' right to access adequate medical care, social security, and compensation in case of work-related injury or illness.
- **Wages and Benefits:** We pay our employees at least minimum wage or the prevailing industry standard, whichever is highest. The amount should be sufficient to cover basic needs for the employee and his/her family as well as provide some additional income. Wages, overtime premiums, and any incentive (or piece) rates are paid directly to the employee on time and in full. We provide our employees with paid sick leave, maternity leave, annual leave, and statutory holidays as required by law or the prevailing industry standard, whichever is highest. We do not make deductions from wages or remove benefits as a disciplinary measure.



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## Environmental responsibility

We minimize our environmental impact and promote sustainable development in our operations. We comply with all applicable environmental laws and regulations and internationally recognized environmental standards and best practices. We have an environmental management system to prevent pollution, conserve resources, reduce waste and emissions, and mitigate climate change.

We conform to these regulations:

- The EU Conflict Minerals Regulation.
- The EU regulation REACH (registration, evaluation, authorization, and restriction of chemicals).
- The EU CLP (Classification, Labelling and Packaging) Regulation for chemicals.

## Ethical business conduct

We conduct our business with integrity and honesty, avoiding any form of corruption, bribery, fraud, or unfair competition. We respect the intellectual property rights of others and protect confidential information entrusted to us by customers and suppliers.

## Prohibited Sourcing and Sales Regions

As long as Russian troops remain on Ukrainian territory, we do not source materials, products or services from Russia and Belarus. This includes direct sourcing as well as indirect sourcing through intermediaries or subcontractors. Neither do we sell our products to customers in these countries or to customers who we suspect of selling them to these countries.

Hans Lindbohm  
CEO

