

## Introduction

This Code of Conduct (hereinafter referred to as the code) applies to all suppliers of products or services to **Roca Industry AB** and its 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 that we require our suppliers to comply with in order to do business with us.

## Compliance with laws and regulations

Our suppliers must comply with all applicable laws and regulations of the countries where they 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

Our suppliers must respect and protect the human rights of their workers, 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:** Our suppliers must respect the right of their workers to form or join trade unions and to bargain collectively, without interference, discrimination or retaliation. In countries where freedom of association is restricted, the company should strive to create an environment in which the company management and employees can discuss salaries and working conditions in a non-threatening manner
- **Elimination of forced or compulsory labor:** Our suppliers must not use any form of forced, bonded, indentured or involuntary labor, or engage in human trafficking or slavery. Workers must be free to leave their employment at any time, without penalty or restriction. Suppliers should not require their employees to pay any kind of deposits, nor may they retain their employees' identity documents.
- **Effective abolition of child labor:** Our suppliers must not employ or exploit children in any way that is harmful to their health, safety, education or development. They must 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:** Our suppliers must not discriminate against any worker or applicant on the basis of race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. They must ensure equal opportunity and treatment in all aspects of employment and occupation.
- **Safe and healthy working environment:** Our suppliers must provide a safe and healthy working environment for their workers, in accordance with national laws and regulations and relevant ILO standards. They must take appropriate measures to prevent accidents, injuries and illnesses, and to protect workers from exposure to hazardous substances or conditions. They must also respect the right of workers to access adequate medical care, social security and compensation in case of work-related injury or illness.
- **Wages and Benefits:** Suppliers should pay its employees at least minimum wage or the prevailing industry standard, whichever highest. The amount should be sufficient to cover basic needs for the employee and their family as well as provide some additional income. Wages and over time premiums and any incentive (or piece) rates should be paid directly to the employee on time and in full. Suppliers should provide their employees with paid sick leave, maternity leave annual leave and statutory holidays as required by law or the prevailing industry standard, whichever is highest. To make unfair or illegal deductions from wages or the removal of benefits as a disciplinary measure is not permitted.

## Environmental responsibility

Our suppliers must minimize their environmental impact and promote sustainable development in their operations. They must comply with all applicable environmental laws and regulations, as well as with internationally recognized environmental standards and best practices. They must also implement effective environmental management systems and practices to prevent pollution, conserve resources, reduce waste and emissions, and mitigate climate change.

Our suppliers must conform with these regulations:

- The EU Conflict Minerals Regulation: The supplier is liable to inform Roca if the product/products contain tantalum, tin, tungsten or gold.
- The EU regulation REACH (registration, evaluation, authorisation and restriction of chemicals). If a product delivered to Roca contains more than 0.1 percent (by weight) of a substance on the candidate list, the supplier is liable to provide Roca with information about this in accordance with REACH.
- The EU CLP (Classification, Labelling and Packaging) Regulation for chemicals.

## Ethical business conduct

Our suppliers must conduct their business with integrity and honesty, avoiding any form of corruption, bribery, fraud or unfair competition. They must respect the intellectual property rights of others and protect confidential information entrusted to them by us or by third parties. They must also disclose any actual or potential conflicts of interest that may affect their relationship with us or our customers.

## Prohibited Sourcing Regions

As long as Russian troops remain on Ukrainian territory, suppliers are prohibited from sourcing materials from Russia and Belarus. This includes direct sourcing as well as indirect sourcing through intermediaries or subcontractors.

## Monitoring and compliance

Our suppliers must monitor their compliance with this code and report any violations or concerns to us promptly. We reserve the right to verify their compliance through audits, inspections or other means. We also expect our suppliers to communicate this code to their subcontractors and ensure that they adhere to it as well. We may terminate our business relationship with any supplier who fails to comply with this code of conduct or who refuses to cooperate with our verification efforts.

We appreciate your cooperation and commitment to this code of conduct. Together, we can create a more responsible and sustainable global supply chain.

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As a supplier to Roca, I agree to comply with this Code of Conduct.

Supplier Name:

Signature:

Name and position: