

Code of Conduct for the Rottneros Group

As decided by Rottneros AB's Board on 24 August 2023



Code of Conduct

This code describes how Rottneros and the company's employees should act in relation to external parties and to each other. The purpose is to define Rottneros' social responsibility, ethical commitment and position on gender equality issues, as well as how Rottneros employees should act regarding issues that involve fundamental principles.

Rottneros must always follow all applicable laws and regulations. Rottneros' overall goal is to create profit for the company's shareholders within the framework of sustainable development and by being a good citizen in society and employer. The company is convinced that these goals are mutually beneficial over time.

The Rottneros Code of Conduct is based on our core values:

- We respect everyone
- We are committed
- We are professionals

Rottneros as an employer

Rottneros shall work actively with safety measures and thereby provide safe workplaces, which in turn prevent workplace injuries, minimise negative environmental impacts and help attract new employees.

Rottneros respects the right of every employee to join, or refrain from joining, trade unions or other workers' organizations and strive for a high degree of transparency and a good climate of cooperation with the trade unions.

Rottneros counteracts discrimination and strives for diversity. All decisions concerning employment shall be based on relevant and objective criteria such as competence, experience and performance.

Rottneros as a business partner

Rottneros strives to always deliver a product adapted to the customer's needs, with the appropriate and also consistent quality, and to provide a high-level of service based on personal commitment and good business ethics.

Rottneros does not do business with companies or individuals who deliberately and systematically violate laws, regulations or human rights. The company's representatives may not secure benefits for themselves or the company as a result of unethical acts.

Rottneros has zero tolerance regarding all forms of corruption and bribery and works actively to ensure that this does not occur within the Group and among its representatives. The giving and taking of bribes is strictly forbidden.

Rottneros supports and strives for fair competition in its business operations, follows all relevant competition rules and refrains from entering into illegal anti-competitive agreements or illegally exchanging price and/or market information with competitors.





When choosing suppliers, customers and partners, a risk assessment is made with regard to the risk of corruption or other crimes according to a checklist. In order to avoid unethical business relationships, a screening is done against sanction lists.

Rottneros as a listed company

Rottneros quickly and transparently provides information about the company's situation and profitability and complies with all legal requirements and established good practice in the market.

Rottneros as a part of society

Rottneros protects human rights and promotes sustainable development.

Rottneros supports and respects internationally recognized human rights, including the UN Convention on the Rights of the Child.

Forced labor, involuntary labor and all forms of child labor are prohibited in Rottneros facilities, or businesses run by Rottneros' business partners. Rottneros complies with applicable national and international minimum age laws.

The business must be conducted with the least possible environmental impact and no raw timber of controversial origin may be used. The business strives to have a high degree of openness and cooperation with local decision-makers in municipalities and county councils.

Rottneros employees

Responsibility, initiative and communication are important keywords for Rottneros employees. Working for the Rottneros Group involves responsibly utilising a high degree of freedom. Rules in the workplace must be complied with, confidential information must be handled accordingly, and deficiencies in the work environment or safety risks must be pointed out. Laws and regulations must be followed. The ability to show initiative is valued by the company and good two-way communication is a prerequisite for being efficient and achieving good results over time.

The employee has a responsibility to contribute to the company's development by using the company's resources sensibly and suggesting improvements in relevant areas. The employee also has a responsibility to report problems and misconduct at the workplace to their immediate superior, or if the misconduct concerns that person, to the immediate manager above the superior, or via the company's whistleblower tool. This allows the company to address problems at an early stage.

All employees are expected to show honesty and integrity in their interaction with other employees, customers, suppliers, business partners, organisations and authorities.

All forms of corruption and bribery are strictly forbidden at the Rottneros Group. No form of bribery or attempted bribery based on gifts, payment or services intended to improperly influence decisions made by customers, suppliers or others is tolerated. An employee must never give or accept gifts or similar that could put the employee in a situation of dependence or gratitude that affects business decisions.





ROTTNEROS

Gender equality issues at Rottneros

All employees are valued equally and must be given respect and treated equally regardless of gender, ethnicity religion, age, disability, sexual orientation, nationality, political opinion, trade union affiliation, social background, health status or family responsibilities.

See also the following documents:

- Work Environment Policy
- Competition Law Policy
- Anti-Corruption Policy
- Sustainability Policy
- Whistleblower Instruction
- Equal Treatment Plan

