



## Ethical Rules for Suppliers to Rottneros

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As decided by Rottneros' CEO/President on 15 August 2022





## 1. Introduction

As a global Group, it is important for common ethical rules and standards to be in place. Rottneros believes that global ethical rules for suppliers create value for all parties as a step towards long-term and sustainable relationships between Rottneros and its suppliers.

Rottneros' Ethical Rules for Suppliers describes what Rottneros considers to be appropriate business ethics for its suppliers and thus also appropriate conduct and behaviour from Rottneros' suppliers when providing services or supplying products to Rottneros.

Rottneros' code of ethics applies to all business partners of Rottneros AB and its subsidiaries. These include, but are not limited to, suppliers, agents, carriers, representatives and joint venture partners (collectively referred to as "Suppliers").

Suppliers shall duly ensure and monitor that their own suppliers comply with these rules or with their own equivalent code of conduct. The supplier is responsible for its subcontractors, as well as for its own work.

In addition to these rules, all suppliers to Rottneros are expected to comply with all applicable laws and regulations.

Rottneros' suppliers are strongly encouraged to take immediate action if non-compliance with the code of ethics is detected. If in doubt, ask the following questions:

- Is it compatible with the rules?
- Is it ethical?
- Is it legal?
- Will it reflect well on my employer and on Rottneros?
- Do I want to read about it in the newspaper?
- Would my family and friends accept it?

If the answer is "no" to any of these questions, avoid the situation. If you are still unsure, ask your employer for guidance or contact Rottneros' contact person. Keep asking until you are sure.

## 2. Business integrity

Rottneros expects its suppliers to operate in an ethical and legal manner and to comply with the following specific rules on anti-corruption, competition, and conflicts of interest.

### 2.1. Bribes

Rottneros has a zero-tolerance policy for bribery and therefore expects suppliers to not accept or offer bribes of any kind. The Supplier shall act in compliance with all applicable anti-corruption laws, including by not accepting or offering bribes, facilitation payments or anything of value for the purpose of obtaining or retaining business or any improper advantage or benefit.

In this sense, bribery includes any transfer of assets and is not limited to monetary transfers. Thus, this prohibition also covers bribes in the form of e.g.:





- Donations to charity
- Payment of travel expenses
- Supply of goods and/or services
- Disproportionately high entertainment expenses
- Transfer of other personal or financial benefits

## 2.2. Gifts etc.

Representatives of Rottneros shall always pay their own travel and accommodation expenses when visiting the supplier, at conferences, at reference facilities, etc. Representatives of Rottneros shall not be offered gifts, hospitality or expenses that may be considered unreasonable or inappropriate in relation to potential business transactions. However, Rottneros recommends that its suppliers refrain from giving gifts to employees of the company. If an employee of Rottneros is invited to an event etc., the employee should ask his or her manager about the suitability of participating.

## 2.3. Competition

In accordance with national and international law, Rottneros' code of ethics and internal policies prohibit all forms of illegal price cartels and other collusive agreements on material terms, prices and fees between competitors (cartel agreements), which could eliminate, prevent, restrict or distort competition.

Accordingly, Rottneros' suppliers must comply with the same ethical rules and laws and have compliance procedures in place and ensure that their employees do not receive or disclose any information about prices or other terms with respect to an unrelated third party, whether orally or in writing, to or from competitors, business partners, customers or suppliers.

## 2.4. General behaviour

Rottneros expects its suppliers to use skilled and trained staff.

Rottneros relies almost exclusively on subcontractors to carry out its core operation when it comes to the physical transport of goods. Rottneros' suppliers are therefore expected to have implemented appropriate measures to detect and prevent the use and abuse of alcohol and narcotics etc. by their staff.

Rottneros expects its suppliers to be able to communicate with Rottneros and its customers in a correct manner. Communication with Rottneros must be in Swedish or English.

Suppliers must also comply with specified requirements, rules and regulations set by Rottneros or its customers regarding general behaviour, handling, stowage, loading, unloading and transport of goods to/from customers' facilities. However, the supplier is not obligated to comply with specific requirements that may conflict with traffic safety regulations or similar provisions in the jurisdictions where transport takes place.

Finally, Rottneros expects its suppliers to ensure that all equipment used in the provision of services to Rottneros is of good quality, meets general and statutory maintenance standards, and complies at all times with all applicable safety regulations.





### 3. Human rights and working conditions

Rottneros strongly believes that human rights are freedoms and rights to which all people are entitled. Rottneros also believes that acceptance of and compliance with internationally recognised human rights is fundamental to all of its business relationships.

Rottneros' suppliers must therefore comply with internationally proclaimed rights.

Rottneros' suppliers shall also provide equal opportunities for its employees and may not discriminate on the basis of race, gender, religious belief, marital status or sexual orientation, and shall not use forced labour.

Rottneros recognises international standards for the minimum age of children and young people and that children and young people should work in different occupations than adults. Rottneros' suppliers must comply with international legislation, including the ILO Convention on Child Labour.

Rottneros' suppliers must provide their employees with a safe and healthy working environment that meets or exceeds all legal requirements at any given time.

Rottneros' suppliers shall respect the rights of employees to freely associate, join trade unions and workers' councils and participate in collective bargaining in accordance with national legislation and international conventions.

Finally, Rottneros' suppliers must comply with applicable laws and standards on working hours and minimum wages.

### 4. Behaviour with regard to the environment

Rottneros' suppliers shall comply with all applicable environmental protection laws and regulations. In addition, our suppliers are encouraged to continuously follow and apply methods and techniques that minimise environmental impact and to work towards resource-efficient use of raw materials and energy.

The supplier shall have a systematic approach to handling environmental issues, including ensuring the availability of written instructions for all processes with a potential environmental impact.

The supplier shall develop procedures for preventing accidents and ensure preparedness to act by analysing and identifying, and taking appropriate preventive and corrective action.

The supplier is obligated to handle environmental violations and complaints systematically and to communicate them to employees and external stakeholders, including Rottneros if the company is affected.





## 5. Implementation

Rottneros' suppliers must comply with Rottneros' current Ethical Rules for Suppliers and follow these principles when choosing business partners when supplying goods or services on behalf of Rottneros.

The supplier is obligated to be familiar with the content of Rottneros' current Ethical Rules for Suppliers.

The obligations under Rottneros' Ethical Rules for Suppliers are in addition to the obligations of suppliers under agreements between Rottneros and the supplier.

The supplier shall allow Rottneros, or a third party designated by Rottneros and reasonably acceptable to the supplier, to conduct, in the supplier's presence, an audit of the supplier's business activities related to this code of ethics.

## 6. Sanctions for breaching our code of ethics

Non-compliance with Rottneros' Ethical Rules for Suppliers is taken very seriously, and the supplier undertakes to initiate corrective action to correct such breaches and to take appropriate measures to prevent any future recurrence.

In the event of serious or repeated breaches, Rottneros reserves the right, without liability, to terminate the business relationship with immediate effect.

## 7. Questions or concerns

Rottneros' Ethical Rules for Suppliers sets standards for what Rottneros expects from its suppliers. This does not mean that situations not covered by these rules exempt suppliers from responsibility for their behaviour.

Rottneros' suppliers shall always use common sense when acting on behalf of Rottneros.

If a supplier faces a dilemma or has any doubts about Rottneros' Ethical Rules for Suppliers, the supplier is advised to contact their contact person at Rottneros. Employees of the supplier and employees of Rottneros have a responsibility to report problems and misconduct to their immediate superior, or if the misconduct concerns that person, to the immediate manager above the superior, or via Rottneros' whistle-blower tool, which can be found on the website.

