

CODE OF CONDUCT



RO-GRUPPEN

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1 General approach

RO-Gruppen's core values, FENA, are our four cornerstones and the foundation of everything we do. They guide us in our efforts to be the motivated, reliable construction partner that our customers value so highly. In short, FENA (an acronym of our values in Swedish) describes how we operate and how we do business.

1.1 FENA – Our core values

- **Trust (Förtroende):** Through FENA, we build long-term relationships and are reliable and honest in our relationships with our customers, colleagues, and managers. Through FENA, we value giving feedback and delivering as promised to these parties.
- **Commitment (Engagemang):** Through FENA, we always endeavour to do our best and encourage the commitment of others. Through FENA, we communicate clearly with others and listen to our customers' and colleagues' requests.
- **Innovation (Nytänkande):** Through FENA, we appreciate thinking differently, listen to others, and welcome new ideas and approaches that pave the way for new solutions. This requires a basic attitude that remembers that there is no "I" in "team".
- **Job Satisfaction (Arbetsglädje):** Through FENA, we contribute to the open dialogue and participation that characterise our culture. This fosters a level of pride and job satisfaction that enables us to conquer our competitors.

1.2 Why have a Code of Conduct?

To support and ensure that everyone at RO-Gruppen lives up to the company's standards and expectations, we have supplemented our core values (FENA) with a Code of Conduct that we should all follow.

1.3 RO-Gruppen's Code of Conduct

This Code of Conduct applies to all employees at RO-Gruppen AB and at all its subsidiaries within the Group (RO-Gruppen).

RO-Gruppen prefers to work with customers, suppliers, consultants and other partners who are willing to abide by our Code of Conduct.

This Code of Conduct has been adopted by the Board of Directors of RO-Gruppen and may only be amended by the Board of Directors.

2 Business ethics

2.1 Decent business relationships

RO-Gruppen has an invaluable reputation as a company with excellent credibility, honesty and integrity in all its relationships. We are convinced that success in business comes from developing and maintaining the trust and credibility that our customers, our employees, the authorities and the public have in us.

We complete assignments professionally and comply with the decisions of the Swedish National Board for Consumer Disputes (ARN) or court judgements.

RO-Gruppen complies with all laws and regulations in all of the areas in which we operate.

2.2 GDPR

RO-Gruppen believes that each individual's privacy is important, which is why we have internal procedures and requirements to ensure that personal data is handled correctly, including by our partners.

2.3 Accounting and financial reports

RO-Gruppen performs correct accounting of financial transactions in accordance with applicable laws and generally accepted accounting principles.

2.4 Healthy competition

RO-Gruppen works to ensure healthy competition for tenders, procurements and purchasing, as well as to combat undue influence, bribery, price collusion, cartels, abuse of market dominance and various forms of manipulation of tenders that aim to distort competition.

2.5 Anti-corruption

RO-Gruppen does not participate in or support any form of corruption. Representatives of RO-Gruppen shall not offer customers, potential customers,

suppliers, consultants, the authorities or representatives of such any form of reward, gift, service or other benefit that contravenes the applicable legislation.

Within the scope of customer events with customers and prospective customers, RO-Gruppen arranges activities to promote a good business relationship. This must always be done in accordance with RO-Gruppen's internal rules and regulations and the applicable legislation (tax legislation). Where there is a risk of events deviating or being perceived to deviate from the Code of Conduct, these must always be approved by the Deputy CEO.

Employees at RO-Gruppen shall not accept payment, gifts, services or any other form of benefit or remuneration from a third party that may influence, or be perceived to influence, their objectivity in business decisions or in their work for the company or a third party.

However, we do recognise that accepting a small gift or hospitality or attending an event, within the bounds of the law, may contribute to a good business relationship. In such cases, the commercial value of the gift must not exceed the applicable amount stated in RO-Gruppen's accountability and authorisation procedures or a lesser amount if so prescribed by legislation. In the event of gifts or hospitality exceeding this amount, the employee must immediately notify his or her manager, who will in turn inform the Deputy CEO. In the event of uncertainty about a gift or hospitality, the employee should always consult his or her manager.

Employees at RO-Gruppen neither solicit nor accept, directly or indirectly, bribes, kickbacks or similar payments. We do not offer or give any form of bribe, kickback or similar unlawful or unethical benefit when pursuing our business activities and doing business on behalf of RO-Gruppen.

RO-Gruppen remains neutral with respect to political parties and candidates for political positions of trust and public office. Neither our name nor our assets shall be used to promote the interests of political parties or candidates.

RO-Gruppen does not accept, facilitate or support cash-in-hand work, money laundering, other financial criminality and influence from illegal activities.

2.6

Conflicts of interest

A conflict of interest arises when something or someone affects an employee's judgement to act in the best interests of RO-Gruppen. Representatives of RO-Gruppen must never make decisions based on personal interests or personal relationships. Employees must make a point of being aware of potential conflicts of interest and avoid any such conflicts involving family members, relatives or close friends. In the event of uncertainty, the employee should always consult his or her manager. Anyone who represents RO-Gruppen must manage their personal and external activities and financial interests in such a

way that they do not conflict with or appear to conflict with the interests of RO-Gruppen.

2.7 **Secondary occupations**

Any form of professional secondary occupation, board assignment or similar that an RO-Gruppen employee performs outside of the company that results in or could result in a conflict of interest must be approved by the Deputy CEO.

2.8 **The company's assets and resources**

RO-Gruppen's assets and resources must be used for business activities. Assets and resources must not be used for personal gain, fraudulent purposes or in other inappropriate ways.

3 **Human rights and work environment**

RO-Gruppen respects and supports human rights and takes responsibility in our activities for the rights of our employees and the communities in which we live and work.

3.1 **Minimum age and employment of own free will**

At RO-Gruppen we do not accept any form of child labour. This means that we and the subcontractors we work with have a responsibility not to employ minors. We further reject all forms of forced labour and human trafficking. These are in contravention of our core values and everything we represent.

3.2 **Equality and non-discrimination (equal rights)**

All employees at RO-Gruppen must have equal opportunities based on competence, experience and performance, regardless of gender, religion or other belief, age, disability, sexual orientation, nationality, political views, trade union affiliation, social or ethnic background.

All employees at RO-Gruppen must be treated with respect. We do not tolerate discrimination, physical or verbal harassment or any form of threats or violence towards our employees.

3.3 **Freedom of association**

RO-Gruppen respects the right of all employees to freedom of association in order to represent their interests as employees, to unionise and to negotiate collectively or individually. We respect the right to become a member of or to

form a union, as well as the right not to be a member of a union, without fear of reprisals, interference, threats or harassment.

3.4 **Work environment**

RO-Gruppen must provide a good work environment and be proactive in terms of employee health and safety.

3.5 **Working hours and compensation**

RO-Gruppen complies with applicable legislation, agreements and industry standards for working hours and compensation.

3.6 **Harassment**

RO-Gruppen does not tolerate any form of harassment, including, but not limited to, threats, discrimination in any form, threats of violence or acts of violence.

3.7 **Misuse**

RO-Gruppen neither tolerates nor permits misuse of alcohol or drugs. The use or distribution of illegal drugs is also not permitted at RO-Gruppen's sites or workplaces.

No one may work under the influence of alcohol or other drugs that prevent them from performing their work safely and efficiently.

4 The environment and sustainability

RO-Gruppen actively works to ensure that our services and products are environmentally sustainable and that our production operations make the best possible use of resources. This is a responsibility that extends to each and every employee.

4.1 **Resource efficiency**

RO-Gruppen endeavours to conduct its activities in a manner that makes efficient use of energy, natural resources and raw materials, and to minimise

waste and excess material. We chose the solutions, materials and tools that are best for the environment from a long-term perspective.

4.2 **Protected assets and confidential information**

It is the responsibility of all RO-Gruppen employees with access to confidential information that is owned by RO-Gruppen or a third party to protect that information from unauthorised access. Examples of such information may include financial information, business plans, intellectual property, technical information and know-how, information about staff and/or customers, and other sensitive information.

Tools owned by RO-Gruppen, such as manual tools, machinery, work vehicles, office equipment, IT systems, applications, software and other assets, must only be used for RO-Gruppen's activities. Any other use must be authorised by a manager.

5 **Compliance with the Code of Conduct**

As a manager at RO-Gruppen, you are responsible for informing our employees about their rights, obligations and responsibilities under this code, and for implementing it within your organisation and following the spirit of the code in your work. Each and every employee is expected to comply with applicable laws and regulations, as well as RO-Gruppen's Code of Conduct and other policies, and to take responsibility for complying with these in our behaviour and our actions. In the unlikely event that part of this code conflicts with applicable legislation, the legislation takes precedence over the code. If the code stipulates a more stringent requirement than the legislation, it is the code that applies.

If you are in any doubt about an action or behaviour potentially conflicting with our Code of Conduct, use your common sense and ask yourself five questions:

1. Is this in line with our Code of Conduct?
2. Is this ethical?
3. Is this lawful?
4. Will this correctly reflect RO-Gruppen's brand and our culture?
5. Would we support this if it became public?

If the answer to any of these five questions is no, then don't do it! If you are still unsure, always be completely transparent and ask your manager for advice.



5.1 **Reporting deviations and breaches of the Code of Conduct**

All employees at RO-Gruppen are encouraged to report suspected breaches of this Code of Conduct to their immediate manager or their manager's manager. If the employee believes that the manager will not act on this, or if he or she has another reason to feel uncomfortable about reporting the suspicion to his or her manager, the matter should be escalated to RO-Gruppen's CEO or Deputy CEO.

5.2 **Whistleblowing system**

RO-Gruppen has a whistleblowing system where you can report your concerns.

In our whistleblowing system, you can - safely and anonymously - report irregularities or illegalities in connection with activities related to the company.

The link to our whistleblowing system can be found on the home page of the Rondellen (company intranet) and on the RO-Gruppen website.

<https://bit.ly/3LNq67J>