



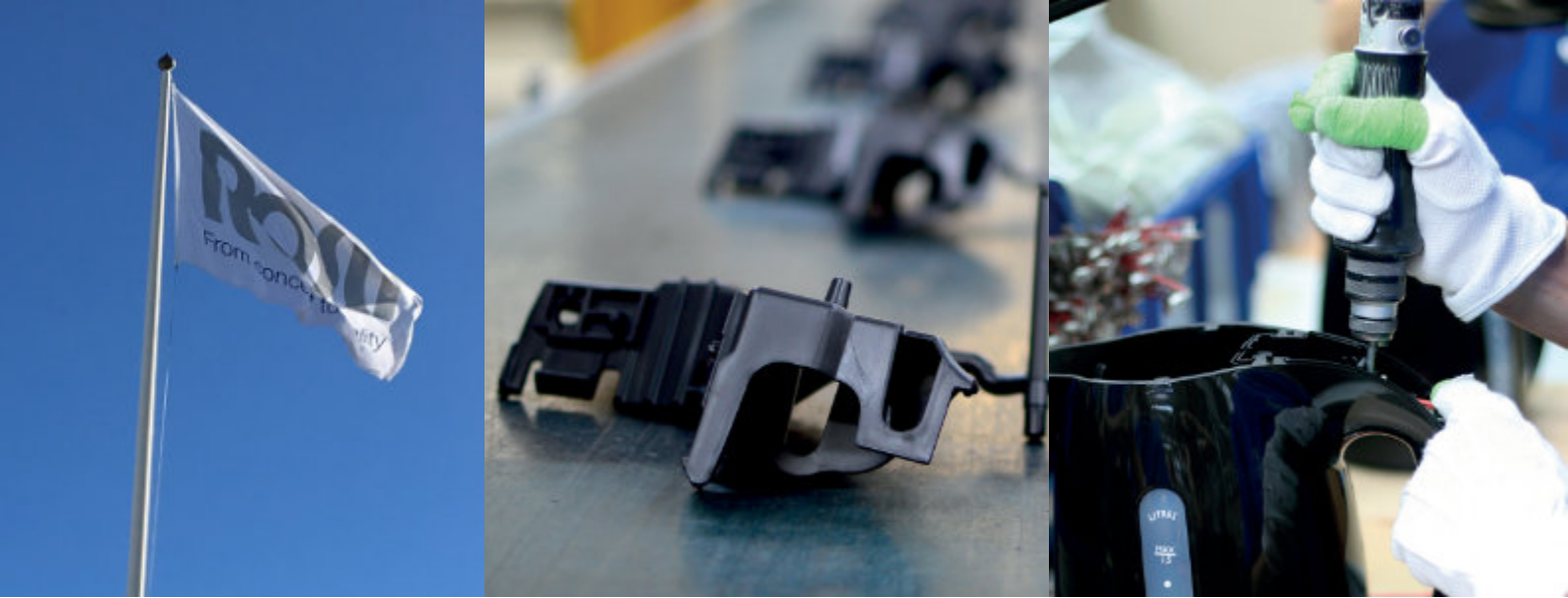
Rosti

Code of Conduct

“To be successful it is vital that we are a reliable and attractive employer, a trustworthy supplier and a good corporate citizen.”

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Introduction

Rosti's reputation and success for over 75 years are based on our shared commitment to our high level of integrity and ethics. Even though we do business in many countries and cultures we are one global company with one global ethical standard which is outlined here in our Rosti Code of Conduct.

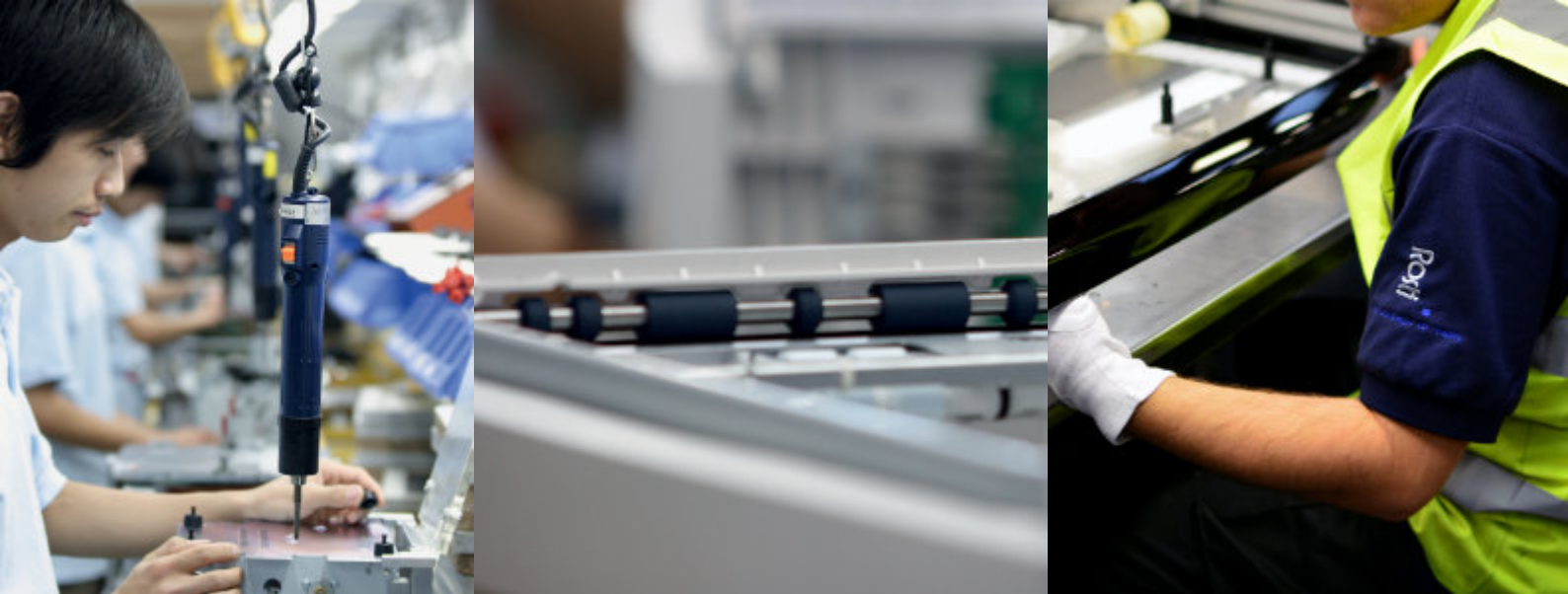
Our Code of Conduct demonstrates our commitment to conducting business in a legal, sustainable, and ethical manner and it is effectively the global how-to guide for how we operate at Rosti. It is binding on all of us – all roles, all levels and everywhere we operate need to not only know it, but also live by our Code of Conduct it every day. It is very important that all our leaders always embrace this and lead with our principles and values to always protect and embrace the future of our company.

Of equal importance is also that all employees, whether you just joined us or have been here for many years are required to acknowledge our code of conduct at all times and thereby understanding what is expected of us.

By embracing our Code of Conduct, we honour our values and high standards.

Malmö, July 2021

Jonas Persson, CEO Rosti Group



Rosti Code of Conduct (the “Code”)

At Rosti, we work to create added value for our stakeholders without compromising the high standards that we set in terms of corporate social responsibility. This Code demonstrates our commitment to conducting business in a legal, sustainable and ethical manner. It is also a confirmation that such conduct is a fundamental part of our values and corporate culture. The Code summarises the policies and principles of how we conduct our business and serves as the ethical foundation of Rosti. The Code does not, however, cover all aspects of ethical behaviour. There will always be areas where we need to use our sound judgement as individuals.

Company commitment

The management of Rosti and all Rosti employees must commit to this Code’s standards and principles. Temporarily contracted coworkers must also commit to this Code. Acts in violation of the Code may cause damage to Rosti’s reputation and may lead to legal action being brought against the company and its employees. They may also breach the terms of employment, which are based on confidence and loyalty, and if serious, may lead to termination of the employment.

Rosti expects suppliers, agents and other business partners to respect the principles set out in the Code and adopt similar procedures no less strict than what is set out in this Code and in mandatory law.

“The Code demonstrates our commitment to conducting business in a legal, sustainable and ethical manner.”

International guidelines

Rosti supports the following international guidelines:

- United Nations Global Compact, www.unglobalcompact.org
- United Nations International Bill of Human Rights, www.un.org
- International Labour Organization Declaration on Fundamental Principles and Rights at Work, www.ilo.org
- OECD's Guidelines for Multinational Enterprises, www.oecd.org

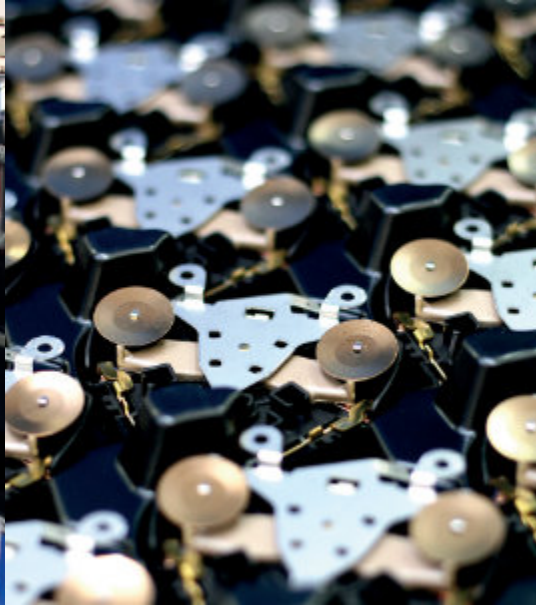
The Rosti Way

At Rosti, our Core Values serve as the foundation for the way we do business and together with our strategy, systems and people we have a solid base for reaching our targets, mission and vision. These are the principles of the Rosti Way. They guide us, express our beliefs and reflect our ambition for the kind of company we want to be. Our Core Values are: Passion, Integrity, Partnership and Excellence and they are the basis of our behaviours: I Connect, I Improve and I Deliver.

This Code is a reflection of and consistent with the Rosti Way. Adhering to the Rosti Way is what makes it possible for us to be "big enough to cope, small enough to care"

Seeking advice

As Rosti employees or managers, we will be confronted by complex situations where we feel that we cannot obtain a clear answer from the Code or from other Rosti policies or guidelines. When this is the case, we expect employees to discuss the matter with their line manager, their line manager's manager or to seek guidance from Group General Counsel or Group Human Resources.



Our workplace

Health and Safety

Rosti's commitment is to ensure a fair, safe and healthy working environment for all employees and other individuals working at or visiting our operations. This commitment includes meeting or exceeding all applicable Health and Safety laws, regulations and standards where we operate. We are all responsible for protecting each other's health and safety, both physically and mentally. Each of Rosti Group's subsidiaries are required to develop Health and Safety plans in compliance with Group expectations and our Health and Safety Framework.

People and Society

The Rosti People vision is to be the employer of choice within precision injection moulding industry. We believe that we can reach this vision by providing a high-performance, engaging and value-based culture with skilled and committed employees in a fair and safe environment. Our decisions on recruitment, promotion, development and compensation are based on the employee's abilities and skills related to the job and must never be based on irrelevant factors. As employees, we must conduct our work with respect for all people, regardless of differences.

Human Rights

Rosti respects and supports all internationally proclaimed human rights and strives to ensure that we are not in violation of any human rights. We welcome and promote diversity in our workforce. No employee should be discriminated against due to their race, colour, religion, national origin, age, gender, sexual orientation, marital status, pregnancy or union membership. Rosti employees and temporary workers are expected to treat each other with respect, fairness and dignity. The harassment, victimisation or bullying of employees will not be tolerated.

“Rosti’s commitment is to ensure a fair, safe and healthy working environment.”

Labour standards

Freedom of association

All employees are free to join associations of their own choosing.

Forced labour avoidance

We do not tolerate forced labour in any form. Employees are free to leave their employment after reasonable notice as required by applicable law or contract.

Fair employment conditions

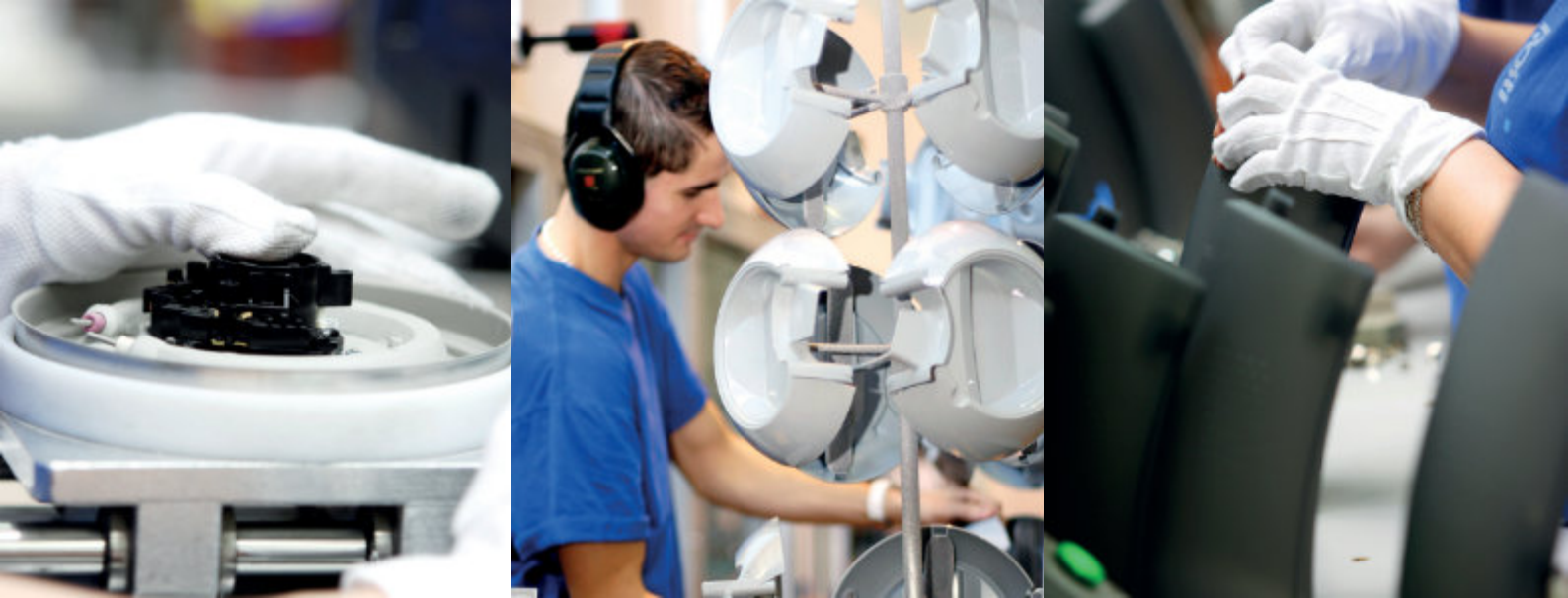
We ensure that all employees understand their employment conditions. Pay, terms and working hours must be fair and reasonable, and must at a minimum comply with applicable law. Corporal punishment, physical or verbal abuse, other unlawful harassment and any threats or other forms of intimidation are not tolerated and are subject to disciplinary actions.

Child labour avoidance

We do not accept child labour. The right of children to be protected from economic exploitation is to be respected. Child labour is defined as work performed by children that interferes with a child’s right to healthy growth and development and that denies them their right to quality education.

Society

We demonstrate good citizenship and involve ourselves in the local community in which we operate. We endeavour to recruit and develop local employees and managers. Rosti will not contribute to or become involved with political parties, politicians or political organisations.



Business ethics

Fair operating practices

With business activities in many countries around the world, the Rosti Group is subject to a wide range of legal requirements. All Rosti managers and employees are responsible for understanding and complying with all the laws, rules and regulations applicable to their areas of responsibility. We conduct our business with integrity and honesty and are accountable for our actions. It is the responsibility of each employee to seek appropriate advice on relevant legal requirements and other legal issues. To provide further guidance in our work to ensure fair operating practices, we have adopted a Competition Policy applicable to managers and employees. Each of the Rosti Group's subsidiaries are required to ensure compliance with this policy as and when required.

Work against corruption

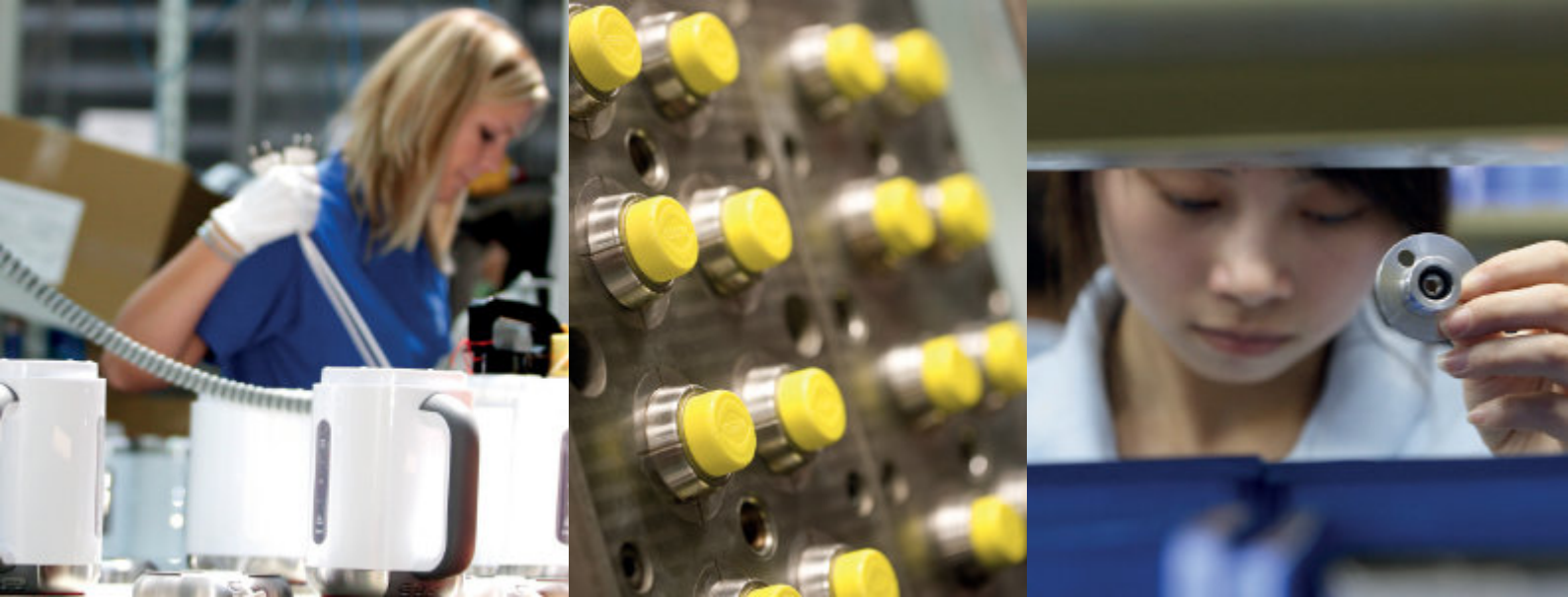
All business relations must be conducted in accordance with local laws and regulations and in a professional, legitimate and honest manner. Rosti employees must never directly or indirectly offer or accept any items of value, including gifts or entertainment. Any form of bribery, fraud, corruption or wrongdoing as extra payments or financial benefits are strictly forbidden and must be reported immediately to management. If you are in doubt discuss the matter with your line manager, which can turn to line manager's manager or seek guidance from Group General Counsel or Group Human Resources.

“We conduct our business with integrity and honesty and are accountable for our actions.”

To provide further guidance on our work against corruption and bribery, we have adopted an Anti-Bribery Policy applicable to managers and employees. Each of the Rosti’s subsidiaries are required to ensure compliance with this policy when requested. All business decisions must be based on the best interest of Rosti, rather than on personal considerations or relationships.

Accounting and reporting

All financial reporting, bookkeeping, records and financial statements for Rosti must be accurate and correct and ensure strict compliance with accounting standards and principles. We safeguard all business records and must also fulfil our obligation to provide accurate financial and other disclosures as stipulated to the local public, government and investors. These include financial statements, invoices, expense reports, payroll and benefits records, and other essential company data.



Information and Communication

Company Assets

At Rosti, we protect information as a valuable asset. All employees must respect business integrity by only disclosing publicly available information and protecting confidential and proprietary information.

We safeguard company assets in our daily work, including how we store proprietary information and to whom we disclose such information. We must be aware of the risk of unintentional exposure of information, e.g. when discussing this in public places or when travelling.

Personal Data

The personal data of our employees, members of board and business partners are treated as valuable asset and protected in a lawful and adequate manner. In the course of our normal business operations, we collect, process and/or transfer personal data only to the extent we have a lawful, specific, definable business need for the information and in compliance with all relevant laws and rules applicable in the markets in which Rosti conducts business, including but not limited to EU General Data Protection Regulation.

We dedicate resources throughout Rosti and set adequate technical and organisational measures in place to safeguard personal data and ensure lawfulness, fairness and transparency throughout the processing cycle. We have adopted a Rosti Personal Data Protection Policy and a governance structure to assist employees,

“All employees must respect business integrity by only disclosing publicly available information.”

board members and Business Partners to comply with the applicable data protection laws. We should always strive to embed “data protection by design” into our operations.

Media Contacts

Communicating correct external information is the senior management’s responsibility. Only members of the Rosti Executive Management team and other representatives appointed by them are authorised to speak to the media on behalf of Rosti Group. For Rosti subsidiaries, the Managing Director or other representatives appointed by them are authorised to speak on behalf of that Rosti company.

Social Media

When we as individuals speak about ourselves in social media, we must not spread Rosti information, and social media should also not be used in a way that could cause harm to Rosti’s reputation or brand. When using online social networks, employees are expected to distinguish between when they participate in social media as part of their employment and when they participate privately.



Environment

Rosti recognises that environmental responsibility is a precondition for the survival and prosperity of human beings. We will develop our business in collaboration with customers, suppliers and partners, and strive to reduce the consumption of energy and raw materials as well as reducing emissions. We must work in accordance with legislative requirements and directives to minimise the impact on the environment. Our aim is to minimise our impact on the environment related to our activities, products and services.

“We strive to reduce the consumption of energy and raw materials as well as reducing emissions.”

Reporting procedure for non-compliance

Rosti can only live up to the commitments contained in this Code if we all act with integrity and speak up as individuals. All employees within Rosti are obliged to report violations or suspected violations of this Code, other Rosti policies or applicable laws to their line managers or their line manager’s manager or to contact directly Group Human Resource or Group General Counsel. Each employee who submits a report will be treated fairly and respectfully. Rosti will not tolerate any form of retaliation against any such individuals and will protect the anonymity of such employees to the greatest extent possible.

To ensure good governance of this Code and to strengthen our strong business ethics, Rosti offers its employees a third-party solution that safeguards their anonymity when reporting concerns regarding compliance with this Code, other Group policies and procedures or any other events or actions related to Rosti operations (the Rosti Whistleblowing Service).

The Code is a living document that will be continually edited and updated.

If you require advice or guidance on the interpretation and operation of this Code, consult your manager or Rosti’s head office.

In the event of uncertainty regarding the Code’s wording the English version applies.

UN Global Compact

The United Nations Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the area of human rights, labour, environment and anti-corruption.

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Rosti Group

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