

Code of Conduct

Version 2 (2026)



Passion



Integrity



Partnership



Excellence

Rosti

Introduction to Rosti Code of Conduct



Jonas Persson

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 and mission. At Rosti, our actions and decisions are guided by our mission: “To empower our partners globally by delivering polymer solutions from concept to reality, to shape a better future. 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 of Conduct reflects our core values and guides our actions, decisions and interactions with our customers, suppliers and the communities we work in. At Rosti, each of us has the responsibility to uphold the highest standards of ethical behaviour in every aspect of our daily work. Our Code of Conduct is not only a set of rules, but also a reflection of The Rosti Way.

I encourage you to read and understand this Code of Conduct as it is an effective way to understand how we operate at Rosti. If you ever find yourself in doubt or faced with a difficult situation, the Code of Conduct can serve as a reliable guide.

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

Malmö, February 2026

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. 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 adhere to the standards and principles outlined in this Code. This commitment also extends to temporary contracted coworkers. 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.

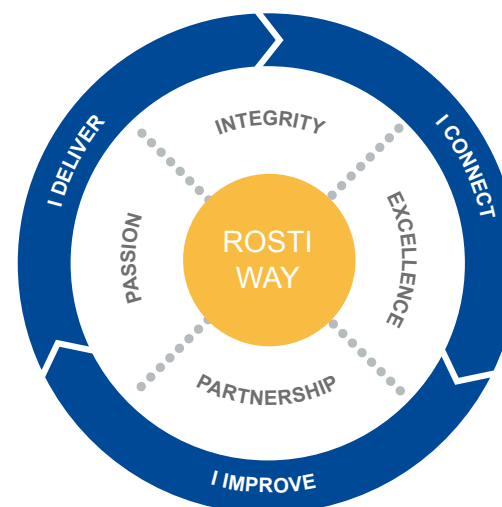
Rosti expects suppliers, agents and other business partners to respect the principles set out in the Code and adopt similar procedures, no less strict than what is set out in this Code and in mandatory law.

Rosti may follow up on compliance with this Code through supplier due diligence activities, including self-assessments, on-site assessments/audits, and requests for supporting documentation. Where deviations are identified, suppliers are expected to implement a time-bound corrective and preventive action plan and provide evidence of closure. Serious or repeated non-compliance may lead to restrictions, suspension or termination of the business relationship.

This Code reflects and is 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, from 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 Legal or Group Human Resources.



Our Workplace

Change Management and Transparency in HR

Transparent communication is key to how we manage, change and drive our organisation forward. In matters related to HR, we prioritise transparency in our actions, particularly concerning personnel decisions, and any organisational changes. This approach fosters trust, openness, and a shared understanding of our direction and decisions, ensuring that employees are well-informed and supported through transitions.

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. Contractors and visitors are expected to comply with applicable site rules and safety instructions when 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 the subsidiaries of Rosti Group are required to develop Health and Safety plans in compliance with Group expectations and our Health and Safety Framework.

People and Society

We are committed to providing a high-performance, engaging and value-based culture with skilled and committed employees in a fair and safe working 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

Human Rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion or any other status. Rosti respects and supports internationally proclaimed human rights and is committed to ensure that we do not cause, contribute or become complicit in human rights violations.

Every child has the right to free, quality education and the right to experience the joys of childhood. At Rosti we do not accept child labour. "Child" means anyone below the highest of: 16 years, the compulsory school leaving age, or the minimum legal working age in the country concerned. No hazardous work is permitted for anyone under 18 years of age.

We do not accept any form of modern slavery, such as forced labour, debt bondage and human trafficking.

We expect these principles to be respected throughout our value chain. Rosti will engage suppliers to address human rights risks and will follow up where needed.



Diversity, Inclusion and Equal Opportunity

A diverse workforce includes people from different backgrounds and identities at all levels of Rosti. Inclusion means creating a work culture where everyone can be themselves and succeed. Equal opportunity ensures that all employees have the same chance to contribute, lead and grow – no matter their background. All employees at Rosti have the responsibility to treat each other with respect and together create a good working environment. No employee should be discriminated against due to their race, colour, religion, national or social origin, age, gender, gender identity, sexual orientation, disability, marital status, beliefs, pregnancy, union membership or any other characteristics that are not related to the employee's ability to perform the duties of the work.

All forms of discrimination and harassment, victimisation, bullying or use of violence is strictly prohibited and will not be tolerated.

Freedom of Association

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

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.

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.

Trade compliance

Rosti complies with applicable sanctions, embargoes and import/export laws, and supports responsible sourcing of minerals from conflict-affected and high-risk areas (conflict minerals), including through supplier due diligence processes. Employees involved in cross-border transactions must ensure that required checks and approvals are completed before committing to or executing a transaction, in accordance with Rosti's Trade Compliance Policy. Business partners acting for, or supplying to Rosti are expected to adhere to the same principles as applicable.

Competition

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 is 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 Legal or Group Human Resources.

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 is 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.

Conflicts of interest

We avoid situations where personal interests may conflict with Rosti's interests or affect our business judgement. This can include family or close relationships with suppliers, customers or competitors, or personal financial interests in such parties. Any actual or potential conflict of interest must be disclosed promptly to your line manager, who may involve Group Legal or HR as appropriate.

Accounting and reporting

All financial reporting, bookkeeping, records and financial statements for Rosti must be accurate and correct and ensure strict compliance with accounting stand-

ards 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 protected in a lawful and adequate manner. We respect and apply the protection of rights and privacy according to the General Data Protection Regulation (GDPR) and other applicable national data privacy laws.

Information Security

At Rosti we are committed to implement strong security measures to safeguard our information against unauthorised access, data breaches and potential disruptions to our operations. All employees at Rosti are responsible for adhering to our IT policies, including protecting passwords, reporting security breaches and participate in IT awareness education.

Artificial Intelligence (AI)

At Rosti, we may use AI to support our work and improve efficiency. We are committed to using AI responsibly and in compliance with applicable laws and internal policies. All employees and business partners acting on behalf of Rosti

must use only approved tools and channels, apply critical judgment and human oversight, and remain accountable for AI-assisted outputs. Confidential information, customer data and personal data must not be entered into non-approved AI tools.

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. Social media should 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 aim to contribute positively to the environment for future generations by reducing our environmental impact. We work in accordance with legislative requirements and everyone at Rosti, in every point of the value chain, must understand what we should be doing to reduce our global environmental footprint.

We prioritise early involvement in product design to address CO₂e emissions, focusing on material choice, recyclability, and minimising material use. We also invest in clean, renewable energy to reduce our CO₂e footprint further.

Through our dedicated Sustainability Champions, located at every Rosti site, we ensure site sustainability optimisation, best practice sharing across the group, and cultural sustainability development.

Where applicable, we ensure that our products and materials comply with relevant product safety requirements and regulations. We take particular care to prevent and reduce risks related to hazardous substances in products and processes, and we expect suppliers to apply the same approach where relevant.



Our 2030 commitments

 50% Reduction in emissions	 100% Clean energy	 100% Green material option
 100% Recyclable design option	 Zero Waste to landfill	 25% Energy efficiency improvement

Rosti

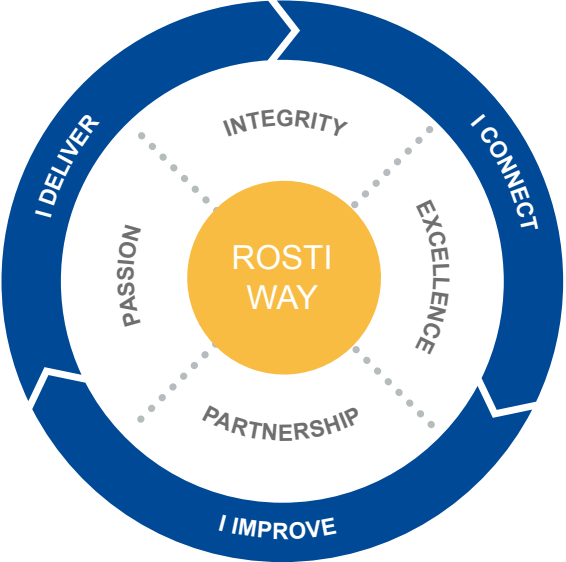
Reporting procedure for non-compliance

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 contact Group Legal or Group Human Resources directly.

For Rosti it is important to get information about unethical behaviour, safety issues, bribery, corruption, discrimination, fraud or anything else that violates the law. Rosti encourage reporting and helping us maintain a transparent, ethical and respectful environment.

Rosti's Whistleblowing channel is provided by an external law firm and all reports are handled professionally in complete confidence. Reports can be done anonymously, and the whistleblower will not be subject to any negative consequences when filing the report, or any time thereafter.

Rosti's Whistleblowing channel is also available for external parties, including suppliers and other business partners, to report concerns related to Rosti's value chain.



United Nations Global Compact

The United Nations Global Compact is a strategic initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles covering human rights, labour, environment and anti-corruption. By adhering to these principles, businesses can contribute to a more sustainable and equitable global economy.



Principles

Human Rights

- Support and respect internationally the protection of internationally proclaimed human rights
- Ensure no complicity in human rights abuses

Labour

- Uphold the freedom of association and the right to collective bargaining
- Eliminate all forms of forced and compulsory labour
- Abolish child labour
- Eliminate discrimination in respect of employment and occupation

Environment

- Support a precautionary approach to environmental challenges
- Promote greater environmental responsibility.
- Encourage the development of environmentally friendly technologies

Anti-Corruption

- Work against corruption in all its forms, including extortion and bribery

In addition to the UN Global Compact, Rosti supports the following international guidelines;

- 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

Closing remarks

If you require advice or guidance on the interpretation and operation of Rosti Code of Conduct, please contact your manager or Rosti's head office.

The Code will be continually edited and updated.

In the event of uncertainty regarding the Code's wording the English version applies. Together we can uphold the highest standard of conduct and contribute to the success and reputation of Rosti.

Thank you for your commitments!

Owner: Rosti Legal

Applies to: Rosti Group and all subsidiaries

The Rosti logo is positioned in the bottom right corner of the page. It consists of the word "Rosti" in a bold, white, sans-serif font. The background of the entire page is a photograph of a long bridge over a body of water, with large rocks in the foreground.