

ROLL GROUP ANTI-HARASSMENT & NON-DISCRIMINATION POLICY

Roll Group strongly believes that MUTUAL RESPECT, LOYALTY AND INTEGRITY is THE foundation of any relation, whether among employees or with external relations. Only with mutual respect and integrity it's possible to work as a team, to stay loyal to the team and therefore to successfully achieve the goals.

Roll Group strives to maintain a workplace that encourage mutual employee respect and promotes professional conduct. Roll Group believes that discrimination, harassment, and retaliation in any form constitute misconduct that undermines the integrity of the employment relationship, the values and ultimately the goals of our company. We will not tolerate any action or conduct which is humiliating intimidating or hostile.

All employees should be able to enjoy and promote a work environment free from all forms of discrimination, including sexual and other illegal harassment.

Roll Group does not tolerate any conduct that constitutes unlawful harassment, discrimination, and retaliation by any employee or third parties working on its behalf.

This prohibited conduct includes discrimination or harassment based on race, religion, colour, national origin, age, sex, gender identity, gender expression, genetic information, disability, political preference, sexual orientation, membership or non-membership of any lawful organization, or any other basis prohibited by local laws or regulations.

The term "harassment" is used in this policy to refer to both sexual and other forms of harassment. Examples of conduct that may constitute harassment*.

SEXUAL HARASSMENT

Sexual harassment is unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct pertaining to a person's sex (including pregnancy, childbirth, breastfeeding), and/or of a sexual nature when submission to such conduct:

- o is made the basis for employment decisions; or
- o is made a condition of employment; or
- o unreasonably interferes with an individual's ability to perform their job duties or otherwise creates an offensive or hostile working environment

Sexual harassment does not need to be motivated by sexual desire. Acts toward an employee because of his/her gender can amount to sexual harassment, regardless of whether the treatment is motivated by any sexual desire. It can be:

- Verbal - like the use of suggestive, derogatory, or vulgar comments or insinuations; making sexual advances, invitations, or comments; making threats; suggestive or insulting sounds; spreading rumours about or rating others as to their sexual activity or performance; or
- Visual/Non-Verbal - like the display of sexually suggestive and/or derogatory objects, pictures, posters, written material, cartoons, or drawings; inappropriate e-mail; or
- Physical - like touching, pinching, kissing, or hugging etc.; the blocking of, or interfering with normal movement; stalking; assault.

Other Forms of Harassment

Other forms of prohibited harassment include (not limited) offensive comments or conduct pertaining to a person's race, religion, colour, national origin, age, gender, gender identity, gender expression, genetic information, marital status, disability, political preference, sexual orientation, membership or non-membership of any lawful organization or any other basis protected by law or regulation. Such conduct may include, but is not limited to:

- Making gestures, threats, derogatory comments, or slurs that may be offensive to individuals in a particular group; or
- Bullying behaviour that is threatening, intimidating, verbally abusive or results in other disruptive actions in the workplace; or
- Displaying derogatory objects, photographs, cartoons, calendars, or posters; or

- Sending messages by letters, notes, electronic mail, or telephone that may be offensive.
- promising or granting favoured treatment in hiring, promotion, discipline, or other decision based on race, religion, colour etc.

RESPONSIBILITY TO REPORT

Any employee who feels he/she has become aware of, observes, or who has been subjected to any form of harassment and/or discrimination by any employee, any third party working on our behalf, any client or customer through actions or words has a responsibility to report or make a complaint about the situation via the following channels:

- the direct manager;
- the legal department;
- the human resource department;
- the Roll Group Board of Directors directly; or
- submit a written report to *codeofconduct@roll-group.com* (anonymous reporting and making use of an anonymous email address is allowed)

Employees are not required to approach the person who is harassing and/or discriminating against them, and they may bypass any such channel to report such conduct.

Any to whom the harassment or discrimination is reported is obligated take the necessary steps to ensure that a prompt, fair, timely, thorough, and objective investigation of the alleged discrimination and/or harassment claim is properly initiated. Roll Group will make conclusions based on the evidence collected.

Roll Group will maintain confidentiality to the extent possible. Roll Group cannot promise complete confidentiality. The duty to investigate and to take corrective action may require in some cases the disclosure of information to individuals with a need to know only.

CORRECTIVE AND DISCIPLINARY ACTION

If Roll Group determines that any harassment or other prohibited conduct has occurred, effective remedial action will be taken in accordance with the circumstances involved.

Any employee determined to be responsible for harassment or other prohibited conduct will be subject to appropriate corrective and/or disciplinary action, up to and including termination of employment. The corrective action issued will be proportional to the severity of the conduct, taking into consideration the history and any similar complaints of prior unlawful discrimination and/or harassment.

BAD FAITH REPORTING

Knowingly reporting a groundless and malicious complaint is also prohibited. If after investigating any complaint or reporting it is determined that an employee intentionally provided false or misleading information, effective remedial action, up to and including termination of employment, will be taken in accordance with the circumstances involved.

ANTI- RETALIATION

Roll group has a firm Anti-Retaliation policy. Roll Group prohibits and does not tolerate retaliation of any kind against employees or others who, in good faith, report harassment and/or discrimination, participate in an investigation, or who otherwise assist in investigating such complaints. If an employee has been subjected to any form of retaliation, the employee must report that conduct as per above described procedure of reporting.