

ROLL GROUP ANTI RETALIATION POLICY

Roll Group is a company with a firm commitment from all our directors and shareholders to maintain a work environment that is free from harassment, intimidation, discrimination and retaliation. Roll Group is actively acting and promoting an atmosphere where all employees feel safe to raise any issue, concern or question and to communicate in an open, direct and honest manner without any fear of retaliation of any kind. Roll Group depends on its employees to raise questions or concerns, to report (alleged) violations or (suspected) breaches of our code of conduct and our policies so that the company can take appropriate action.

Retaliation can be described as doing something (wrong in return) in response to an action done to oneself or an associate.

Roll Group strictly prohibits and will not tolerate any form of retaliation against anyone who, in good faith, reports an actual or apparent violation of the Roll Group's code of conduct, policies, or applicable laws or regulations, even if it turns out there is no actual violation. The same applies for any individual who assists in the investigation of a suspected violation.

No employee shall be fired, demoted, suspended, threatened, harassed, intimidated, or otherwise retaliated against in any way as a result of his or her report or assistance of any investigation of an actual or suspected violation or breach in good faith.

However, any employee who knowingly makes a false allegation or provides false or misleading information during an investigation will be subject to disciplinary action, up to and including termination of employment.

Reporting

Any Employee who has become aware of, observes, or who believed has been subjected to any form of retaliation has a responsibility to report or make a complaint about the situation via the following channels:

- o the direct manager;
- o the legal department;
- o the human resource department;
- o the Roll Group Board of Directors directly; or
- o 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 has retaliated, and they may bypass any such channel to report such conduct. Any to whom the retaliation is reported is obligated take the necessary steps to ensure that a prompt, fair, timely, thorough, and objective investigation of the alleged claim is properly initiated. Roll Group will make conclusions and take the disciplinary actions based on the evidence collected.