

SUPPLIER

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CODE OF CONDUCT

INTRODUCTION

Roll Group companies are modern businesses built on the premise that the needs of our clients must take priority in everything that we do. This focus has enabled us to build an enviable reputation in our respective fields of operation. RollDock in heavy marine transportation and Roll-Lift in engineered heavy lifting and specialised transportation and our combined in house factory to foundation solutions. And to achieve our goals, we work with subcontractors and suppliers with the same drive and ethical behavior.

In Roll Group, we set high standards for our corporate and individual behavior as specified in the Roll Group Code of Conduct: This is what we stand for, this is who we are.

On behalf of our stakeholders, we count on our suppliers to do likewise in carrying out their work. The Roll Group Supplier Code of Conduct details our expectations. They are not intended to conflict with or modify the terms of any supplier contract with Roll Group or any of its companies. If a Roll Group contract, and/or applicable law or regulation, addresses any area covered by this Supplier Code of Conduct, suppliers must comply with the contract and/or legal or regulatory requirement.

We expect all suppliers to respect and conduct business according this Supplier Code of Conduct ("Code") and share it with their employees. We expect our suppliers to adhere to their own similar code of conduct. Having regard to the size and nature of their business, we also expect our suppliers to have management systems in place which support compliance with applicable laws and regulations.

With a shared commitment to ethical performance, we will reassure our respective customers, employees, investors and others – helping to improve the reputation of both our companies.

We are happy to answer any questions you might have about the Code and its provisions at any time, which you can direct to your contact at Roll Group.

Teamwork is essential because
Together WE KNOW HOW.

Peter Rondhuis CEO

GENERAL EXPECTATIONS

Roll Group, including all of its subsidiaries, divisions, operating entities and authorized agents (jointly “Roll Group”), is committed to:

- A standard of excellence in every aspect of our business and in every corner of the world
- Legal, ethical and responsible conduct in all of our operations
- Respect for the rights of all individuals, including
 - protection of human rights
 - fair and non-discriminatory labor practices
- Respect and care for the environment

We expect all of our suppliers, manufacturers, service providers, and business partners along with their subsidiaries, affiliates, sub-contractors, and recruitment agencies (jointly “Suppliers”), to make these same commitments based on our this Code and the Ten principles of the United Nations Global Compact and in alignment with the Declaration on Human Rights and ILO standards.

This Code covers the following topics:

- Quality, Health, Safety, Security and Environment (QHSSE)
- Mutual Respect, Loyalty and Integrity
- Anti-fraud and corruption
- Conflict of Interest
- Protection of Assets and Confidential and Personal Information
- Record Keeping, Reporting and Anti Retaliation
- International Trade Compliance, Anti-Trust and Competition
- Involuntary and Child labor
- Compensation and Working Hours
- Other Laws

OUR SUPPLIER CODES I

Quality, Health, Safety, Security and Environment (QHSSE)

Roll Group expects their Suppliers to fully comply with our QHSSE Standards, NEVER jeopardize the safety or health of any person, or unnecessarily harm the environment. When activities are deemed unsafe, we expect to STOP the activities and to propose a safe alternative.

Our Suppliers must comply with applicable laws and regulations regarding the environment and to conduct their business in a manner that actively manages environmental risks. We expect our Suppliers to address adverse environmental impacts and to support us to fulfil our QHSSE goals and to ensure safe working conditions at all times.

Periodically the Roll Group QHSSE team audits compliance with international and local (country, state, province, client etc.) legislation and regulations.

Mutual Respect, Loyalty and Integrity

Always treat any person with dignity and respect and forbid any (possible) corporal punishment, (threats of) violence or other forms of physical, sexual, psychological or verbal harassment, abuse or intimidation.

Always fight against and never tolerate any form of discrimination based on race, religion, color, 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.

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Anti-fraud and corruption

Always fight against, and never tolerate any form of fraud or corruption, including extortion and bribery, or any other improper inducements for business or financial gain, and abide by all applicable local, national and international laws, expressly including the US Foreign Corrupt Practices Act and the UK Bribery Act, and the related principle adopted in the United Nations Global Compact's Ten Principles. Roll Group expects its suppliers to be similarly intolerant of corrupt activity and to have appropriate and adequate procedures to prevent such activity from taking place.

Conflict of Interest

All business decisions must be made free from any (possible) conflict of interest or personal gain. We expect that our Suppliers will act in the best interest of the Roll Group and to avoid conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Roll Group. When such actual or potential conflicts do arise in the course of business, we expect our suppliers to disclose them to Roll Group in a timely way.

Protection of Assets and Confidential and Personal Information

We expect our suppliers to protect all sensitive information, including confidential, proprietary and protected personal information.

Information should not be used for any purpose other than the business purpose for which it was provided without prior authorization. Where such information is held or transferred electronically, we expect our suppliers to implement appropriate IT cyber security and to notify us of any suspected or actual data breaches. We expect our suppliers to comply with all applicable intellectual property rights and data privacy laws

SUPPLIER CODE OF CONDUCT

OUR SUPPLIER CODES II

Record Keeping, Reporting and Anti Retaliation

We expect our suppliers to accurately and securely capture, store, and retain, as appropriate, business records. Suppliers must stimulate their staff to feel safe to report any (potential) breach of this Code and Suppliers must forbid any retaliation against any employee who makes a good faith report of abuse, intimidation, discrimination, harassment or any violation of law or of this Code of Conduct, or who assists in the investigation of any such a report.

All breaches (potential) breaches of this code MUST be reported to Roll Group in writing to:

- the Supplier's Roll Group contact person;
- or digitally:
 - the Roll Group Whistleblowing website: <https://report.whistleb.com/en/rollgroup> (*anonymous reporting*) OR
 - submit a written report by email to: codeofconduct@roll-group.com (*anonymous reporting and making use of an anonymous email address is allowed*)

International Trade Compliance, Anti-Trust and Competition

We expect our suppliers to conduct business in compliance with all applicable laws, regulations and sanctions governing:

- Export, re-export, import of products, technical data, software and services;
- Economic sanctions and embargoes.

We expect our suppliers to conduct business in accordance with all applicable competition and anti-trust laws and regulations. Our suppliers are expected not to enter into formal or informal anti-competitive arrangements that improperly restrict competition.

Involuntary and Child labor

NEVER directly or indirectly use, participate in, or benefit from involuntary workers, including human trafficking-related activities.

NEVER use child labor; persons younger than 15, or, if higher, the local legal minimum age for employment or the age for completing compulsory education. If required by law, Supplier will have a procedure to invest in a remediation system to assist any children found to be working for the facility that caters to the children's best interests.

Compensation and Working Hours

We expect Suppliers to recognize that wages are essential to meeting employees' basic needs. At a minimum, Suppliers will comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits. Supplier's employees may voluntarily choose to work more hours, provided that they are not pressured to do so and that Supplier remains in compliance with all applicable laws, regulations and standards related to maximum hours.

Other Laws

Suppliers will comply with all applicable local, national and international laws, regulations, treaties and industry standards. In the event that the requirements of this Supplier Code of Conduct are stricter than applicable local, national or international law, Supplier will comply with this Code. However, if there is any conflict between the requirements of this Code and the requirements of any applicable local, national or international law, Supplier is to comply with the local, national or international law. Supplier will notify Roll Group in writing of any such conflicts.



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