

## Rimaster's Code of Conduct

### Contents

1	MESSAGE FROM OUR CEO AND VICE CEO.....	2
2	GENERAL.....	3
3	FAIR BUSINESS.....	6
4	HUMAN RIGHTS AND LABOR CONDITIONS .....	8
5	ENVIRONMENT.....	10
6	END-USER SAFETY .....	11
7	FINANCIAL REPORTING.....	11
8	MANAGING OUR ASSETS .....	11

## 1 Message from our CEO and Vice CEO

When we represent the Rimaster Group we are guided by our vision, business idea, culture and values. The vision inspires us to “create simplicity” for our customers. Our business idea sets a clear path to deliver in accordance with the vision. And the culture and values define who we are, what we stand for and how we behave.

With this in mind, we expect a lot from ourselves. Our work is based on common sense, honesty, openness, respect and integrity. Our colleagues, customers, business partners and society share these expectations. We aim to do good business by exceeding them. This Code of Conduct helps us do that. Based on our culture and values, it states the behavior that we all within the Rimaster Group will follow!

Rimforsa, 23 January 2024

---

Tomas Stålnert  
CEO, Rimaster AB

---

Pernilla Norman  
Vice CEO, Rimaster AB

**NOTE** This is the external version of Rimaster’s Code of Conduct and many links are to internal documents, thus not available from this document.

## 2 General

This Code of Conduct forms the basis for our work within the Rimaster Group. Our Code of Conduct (hereinafter referred to as the “Code”) promotes fair and safe working conditions, safeguards human rights, points out our responsible approach to environmental matters and highlights our requirements for high ethical standards within the Rimaster Group.

The Code outlines the principles and directives we apply when at work. It also includes fundamental and important principles that align with our core values regarding how we act and behave in relations with one and another, both within each unit and within the Rimaster Group, but also in our relations with external stakeholders such as customers, suppliers and authorities, and defines the minimum level of acceptable conduct.

We have selected to align with UN Global Compact’s ten principles of human rights, labor, environment and anti-corruption in order to conduct responsible business wherever we are in the world. Closely linked to these ten principles are United Nation’s seventeen Sustainable Development Goals (SDGs), several to which we contribute. You may refer to our [CSR report](#) for further details.

### 2.1 To whom do this Code of Conduct apply?

This Code applies to all of our employees whether full-time- part-time or temporary and independent of position. It also applies to the board members of the Rimaster Group (Rimaster AB).

### 2.2 Supplier Code of Conduct

This Code also applies, for the time being, to our suppliers, business partners and sub-contractors to applicable extent as defined by contractual agreements.

However, during this year (2024) we will set a specific and general Supplier Code of Conduct where the requirements in this Code will be reflected.

### 2.3 How does the Code work?

The Code is an important document and shall be a part of the annual personal development talk (PD talk) between an employee and his or hers line manager. During the PD talk, the employee must confirm in writing that he or she has read, understood and agrees to follow the principles in the Code. The responsibility for the Code to be implemented in this way rests on the Managing Director for each unit.

Employees must follow the principles of and the underlying purpose of the Code. The Code must be followed, not only to the exact wording but also as a general guidance for decisions on matters not expressly regulated in the Code. If situations arise where the Code, or other internal document, do not provide any direct guidance, the following questions can help in making the right decision:

- Is the decision consistent with our Code?
- Is the decision legally, ethically and morally correct?
- Will the decision reflect well on the Rimaster brand?
- Will the decision leave Rimaster, our employees and our customers without harm?
- Would we be willing to stand up for the decision in public?

If the answer is “No” to any of these questions, do not do it. Whenever you are uncertain, always be transparent and ask your manager for guidance.

## 2.4 Compliance with laws, rules and regulations

We are expected to comply with laws, rules and regulations in all the countries where we operate. We are also expected to comply with this Code.

If the Code is in conflict with the law, the law always prevails over the Code. If the Code stipulates higher demands than the law, the Code prevails. Each and one of us must understand the Code and take responsibility for complying with the Code and the law when at work.

In addition to the Code, our actions are also governed of the values given by our policies within Environment, Labor Practices and Human Rights, Ethics and Sustainable Procurement (see Rimaster's CSR Polices - Internal).

We also follow the 10 principles of the UN's Global Compact and work towards several of the areas within UN's 17 Sustainable Development Goals. See our [CSR report](#) for more information.

## 2.5 Employee responsibilities

As employees of Rimaster, everyone shares the following responsibilities:

- To read this Code and to integrate the principles it sets in your personal conduct.
- To comply with our policies and procedures, as well as local laws and regulations.
- To attend and actively participate in ethics and compliance training and initiatives.
- You have the right and responsibility to seek guidance if you are in doubt regarding any decision you make when at work.
- You have an obligation to report what you in good faith consider to be violations, or possible violations, of this Code, our policies or procedures, laws or regulations

## 2.6 Additional responsibilities for managers

If you are a manager, you have additional responsibilities that go beyond the basic requirements of all employees:

- Lead by example by following G\_P\_005 Rimaster leadership guide as well as this Code, always promoting them.
- Provide support and guidance on integrating this Code into the daily work of those who report to you.
- Encourage your direct reports to raise questions and concerns and to create a culture of openness and trust.
- Support and protect individuals who, in good faith, report concerns or violations. Any such case must be handled with the highest degree of integrity and professionalism. You too have the right and responsibility to seek guidance on how to deal with such reports if necessary.
- Never take or allow retaliatory action against anyone who reports concerns in good faith.
- Monitor compliance with the Code of Conduct and ensure that your direct reports complete all required training.

## 2.7 Rimaster's responsibilities

As a corporate entity, Rimaster has a responsibility to:

- Create a safe and diverse workplace for all employees.

- Set the highest standards of integrity for its operations and to communicate these to its employees through this Code.
- Provide all employees with the training and tools necessary to address ethics or compliance issues they may face in their work.
- Ensure any reports of violations are treated confidentially and responsibly, and that the reviews of any reports are impartial and diligent.
- Ensure zero tolerance towards retaliation for reports made in good faith.
- Continually strive to improve our corporate governance and culture.

## 2.8 How you seek guidance

It is your right and responsibility to obtain guidance regarding any decision related to this Code that you are uncertain about. “I didn’t know” is not considered a valid defense for making a decision that is not in accordance with our Code.

Your first point of contact for guidance should always be your line manager.

Alternatively or additionally, you can contact the following functions:

- CFO: Issues related to financial accountability and transparency.
- Global HR Manager: People-related issues and issues related to health and safety.
- Global Quality & Environmental Manager: Issues related to quality and environment.
- Global Sourcing Manager: Issues related to our suppliers.
- Global Sustainability Manager: Issues related to ethics and compliance.

## 2.9 How to report issues

Reporting should be done as soon as possible. Your first point of contact for reporting a violation should usually be your line manager.

If you suspect your line manager of wrongdoing, the issue involves senior or executive management, you have concerns about retaliation, or you, for whatever other reason, feel uncomfortable with reporting to your line manager, you may report to our CFO, Global Sustainable Manager, Global HR Manager or by Rimaster’s whistleblowing (see below) where you can report anonymously if you wish.

Please note that you can report also possible violations, meaning you do not need to have all the facts or be completely certain of wrongdoings. If you have reasonable concern that misconduct has taken place, this is sufficient to report the issue. The only conditions for reporting an issue are that you do so in good faith and are completely honest about what you know or suspect.

Reporting in “good faith” means that you provide all the information you have and believe to be true, even if you remain anonymous. You can report something you suspect and still be in good faith, even if your suspicion turns out to be unjustified. If anyone deliberately makes a false report (i.e. claiming something they know to be untrue), that person will be subject to disciplinary action.

## 2.10 Anonymous reporting

You can report an issue anonymously through Rimaster’s whistleblowing available both in our Quality Management System (G\_R\_005 Whistleblowing) and on our web site ([www.rimaster.com/downloads](http://www.rimaster.com/downloads)). The document gives detailed instructions on how to report an issue.

## 2.11 Prohibition of retaliation

Retaliation can mean any unfavorable action, practice or omission that results from, or is a reaction to, an employee's reporting of an issue, e.g.:

- Threats, harassment, discrimination, social exclusion, changes to roles, responsibilities or working conditions or other unjust behavior.
- Unfair performance evaluation, salary increase or setting of unrealistic expectations.
- Termination, dismissal or disciplinary action.

Everyone should feel safe to share their concerns why we do not tolerate retaliation against anyone who has reported an actual or suspected violation in good faith.

If you have experienced retaliation, you may report this as a suspected misconduct in any of the ways described above.

## 2.12 Certifications

Rimaster AB and all our manufacturing units are certified towards ISO 9001:2015 Quality management systems, ISO 14001:2015 Environmental management systems and ISO 45001:2018 Occupational health and safety management systems.

These certifications constitutes cornerstones when it comes to how Rimaster is managed, e.g.:

- A risk based approach in all our operations where risks are continuously identified and mitigating actions are planned.
- Continuous improvements of our methods and processes toward clear targets related to key factors for our customers, such as delivery performance and quality.
- A continuous work to lower our environmental footprint.
- Structured processes to continuously improve the situation regarding organizational health and safety for all our employees.

## 3 Fair business

We support fair and free competition in all parts of our business. We follow and respect the rule of laws in the countries we are operating and doing business in. We conduct our business with integrity and honesty and are accountable for our actions. This Code sets a minimum standard in relation to what is considered appropriate behavior. If local laws or regulations are stricter than the Code, local laws and regulations must always prevail.

### 3.1 Competition principles

We do not engage in illegal industrial co-operation or cartels. Instead we act in accordance with fair business competition principles, marketing and advertising practices.

### 3.2 International trade compliance

We comply with trade compliance regulations and other laws and requirements that regulate the transfer of goods and technology. All transactions, regardless if they are crossing borders or are transferred within the same country, may be subject to national and international customs, import or export control regulations and processes which have been put in place to ensure compliance with international trade laws.

Our employees must provide customs with complete and accurate import and export documentation including complete product descriptions, when classifying goods.

### 3.3 Money laundering

We are committed to comply with laws against money laundering and terrorism financing which are in place in most countries worldwide. Money laundering occurs when funds or other assets originating directly or indirectly from a criminal offense are placed in the economy, making their source appear legal.

### 3.4 Conflicts of interest

You should never use your employment within Rimaster for personal gain and you should avoid engaging in external financial interests that might conflict with our interests. Avoid substantial personal or family financial interests in any operation or company that has business relationships with us. It is critical that any such relationship is disclosed in advance to determine if it is appropriate.

Employees should not engage, with or without compensation, in activities that might conflict, or appear to conflict, with our interests.

### 3.5 Fraud

Fraud, being any intentional act, or omission to act, with the intention to deprive another's property, may include but is not limited to:

- Internal and external threats.
- Diversion of assets.
- Theft.
- Any form of corruption, including facilitation payments.
- Financial or non-financial statement manipulation.
- Failure to report on breaches of the law, regulations or our procedures.

We have zero tolerance for fraud and we act firmly to mitigate any identified risk of fraud.

If you experience a possible violation, you should report this immediately, see section 2.9.

### 3.6 Corruption, including bribery, gifts and facilitation payments

Corruption may be described as obtaining an improper advantage that will influence your ability to make objective decisions at work. Bribery, gifts and facilitation payments are types of corruption.

Improper advantages can include cash, valuable or frequent gifts, travel or hospitality such as sporting or cultural events but may also be more indirect, such as "favors".

We have zero tolerance towards any form of corruption, bribery and facilitation payments and independent if it is offered, requested or accepted. Thus, our employees shall avoid situations where loyalty to the company may come into conflict with other personal interests due to corruption.

You have the right and responsibility to obtain guidance on these issues if you need to, and your first point of contact should always be your line manager, see section 2.8.

### 3.7 Cooperation with authorities

We co-operate appropriately with authorities in the countries where we operate and all other relevant authorities. We respond upon requests from the authorities in a timely, correct and well documented way.

We do not hide nor disclose information from the authorities that should be reported within the laws and regulations of a nation.

We cooperate and act respectfully against representatives from the authorities if we are being audited in different areas.

### 3.8 Political involvement

We observe strict neutrality with regard to political situations, parties and candidates. Neither the names nor resources of the Rimaster Group shall be used for political involvements.

### 3.9 Donations and sponsorship

Charitable donations and sponsorships must be free from any suspicion of bribery or conflict of interest whether direct or indirect and should be supported and documented. Employees must ensure that charitable donations and sponsorships are never offered as an incentive or reward for obtaining or retaining business, or for any other improper purpose.

During this year (2024) we intend to set a specific "Donations and Sponsorship Policy".

## 4 Human rights and labor conditions

We support and respects the international human rights standards under the UN Guiding Principles for Business and Human Rights and strives to ensure that our operations do not cause or contribute to adverse impacts on human rights. We also strive to not be complicit in any human right abuses by seeking to prevent and mitigate adverse human rights impacts in our supply chain.

### 4.1 Fair employment conditions

Fair employment conditions are defined by our "Working Conditions Policy" (found in Rimaster's CSR Polices - Internal) with the main issues being:

- Standard working hours for full time employment contract is never to exceed 40 h per week. Atypical and overtime work is performed in accordance with valid collective agreements.
- The salary follows the country's collective agreements and is negotiated with the local union through employee representative or directly with the employee.
- All employees are given vacation time in accordance with the rules and regulations valid in the specific country.
- Work-life balance is supported by flexible working hours and arrangements where possible.

### 4.2 Freedom of association and right to collective bargaining

We have the deepest respect for the rights of the individual and we demonstrate good faith and mutual respect when dealing with employees and their representatives in the workplace. We respect all our employees' right to form and join organizations of their choice and to bargain collectively. Several of our sites are under collective bargaining agreements and we have a long tradition to work alongside representative bodies.



See our “Social Dialogue Policy” (found in Rimaster's CSR Policies - Internal) for further details.

### **4.3 Child labor, forced labor and human trafficking**

Child labor, forced labor and human trafficking are treated by us as zero-tolerance issues and we:

- Do not tolerate any form of child labor or other forms of exploitations of children. No one is employed below the completion of compulsory school or under the age of 15 and no one under the age of 18 is employed for hazardous work.
- Do not tolerate any form of forced or compulsory labor.
- Do not tolerate any form of human trafficking, whether by force, fraud or coercion

See our “Child Labor, Forced Labor and Human Trafficking Policy” (found in Rimaster's CSR Policies - Internal) for further details.

### **4.4 Diversity, discrimination and harassment**

We strive to promote equal rights and opportunities for all individuals in terms of working conditions, employment conditions and development opportunities within the company.

We work actively, consciously and target-oriented for inclusion and to counteract all forms of discrimination as we shall be an equal workplace free from discrimination and where all individuals are met with respect and given the opportunity to fulfill their full potential.

The work for inclusion and against discrimination must be a natural part in all our units and is seen as a matter of course within the Rimaster Group. It must focus on preventive measures to ensure that all individuals, regardless of gender, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age are given equal opportunities and obligations.

See our “Diversity, Discrimination and Harassment Policy” (found in Rimaster's CSR Policies - Internal) for further details.

### **4.5 Violence**

We do not tolerate any violence or threat of violence against employees, visitors, customers, suppliers or any others at the workplace. Disciplinary action, which can lead to dismissal and termination of employment, will be taken against those who violate this.

### **4.6 Drugs and alcohol**

We do not tolerate use of alcohol, narcotics or misuse of medicines during work. It is strictly forbidden to use, sell, buy, produce or possess alcohol or narcotics within and around our premises. This includes driving under the influence of alcohol or narcotics during or in connection to any work related occasion.

### **4.7 Health and safety**

Our work environment must be safe, both in terms of physical and psychosocial conditions, and provide equal opportunities for collaboration, social interaction and workplace development. We believe that this is achieved by an open attitude and keen awareness from all employees, characterized by:

- Global and local management includes work environment in regular strategy process and daily operations, report progress towards decided objectives, commit towards continual improvements and ensure clear communication.
- All employees follow the laws and regulations, rules and common practice in the field of work environment.

- All employees take a personal responsibility in the daily operations for a safe and secure work environment.
- All employees assess possible risks as early as possible in regular safety inspections, emergency preparedness and risk analysis. Identified risks are addressed by the local safety committee and management group.
- The company provides necessary personal protective equipment (PPE) to all employees who have an identified need.
- The company works proactively, determined and as active as possible with employees in need of rehabilitation, to ensure a swift recovery and return to work.
- All visitors, sub-contractors or other persons not employed by us and who reside in any of our premises are to receive clear information about safety at Rimaster.

See our “Health and Safety Policy” (found in Rimaster's CSR Polices - Internal) for further details.

#### **4.8 Society and community engagement**

We mostly operate our family-owned business in small towns or villages, thus usually playing a fairly important role in those societies. It is therefore important that we contribute not only by ensuring a safe workplace, but also helping the local society when it comes to issues such as younger people’s role in the society and local initiatives to prevent unemployment.

Examples of initiatives towards our employees are:

- Financial contribution from the company’s side to different types of physical activities.
- Support towards employees in need of rehabilitation, to ensure a swift recovery and return to work.
- Arrangement of yearly get-together parties, such as Christmas and summer parties.

We also contribute to the integration of young people and immigrants for a future employment. Younger people in the need of work experience are taken in as trainees and we integrate immigrants into work, thus helping in preventing a demoralizing unemployment.

Further, being a family-owned company with main manufacturing units mostly in smaller towns or villages, it is important for us to be an integral part of the society around us. We do this by supporting local sports clubs, preferably focusing on kids and younger people.

## **5 Environment**

The Rimaster Group is, by nature, a fairly environmentally friendly company regarding the type of production we have. Nevertheless, we must constantly focus on minimizing our environmental footprint where all employees have a responsibility to contribute. Environmental focus areas for us are:

- Waste and recycling, where we recycle all fractions that are possible for the local waste management system to collect.
- Greenhouse gas emissions (GHGs), where we work on reducing the effects of transportation of goods and travelling.
- Energy consumption, where our room for actions is small why we are focusing on the use of energy coming from renewable sources.

See our “Environmental Policy” (found in Rimaster's CSR Polices - Internal) for further details.

## 6 End-user safety

Rimaster is mainly a contract manufacturer towards product owners. During the last number of years development has been done of products and technologies that support our customers in making better and more reliable systems for their customers, being the end-user.

Our products shall always be developed towards clear specifications, verified accordingly and preferably validated in intended use by selected customers in order to ensure end-user safety as far as possible. We have clear processes, routines and instructions for this in our Quality Management System (QMS).

However, as our products are integrated by our customer as a part of their system, we can never guarantee end-user safety if our products are used outside specifications or for other purposes than intended.

## 7 Financial reporting

All units within the Rimaster Group have uniform accounting principles in order to achieve consistent and comparable financial information. These accounting principles are defined in our accounting documentation and consists of plans for authorization, transfer pricing rules etcetera.

All accounting and reporting must be conducted accurately, with a high level of quality and in accordance with internal routines and instructions. For statutory compliance, all units also need to comply with local laws and regulations related to accounting.

## 8 Managing our assets

To protect our assets from damage, theft or misuse is crucial and employees have access to and control over many company assets including physical items, intellectual property and information. We rely on our employees to safeguard company resources and to use them appropriately, helped by the guidelines in the Code.

### 8.1 Protecting our property

Our brand is our most valuable asset. Therefore, we must all respect the brand values and treat the Rimaster brand with the highest respect in all situations.

All employees are responsible to protect Rimaster's material and immaterial assets against theft, misuse, loss or destruction. Any theft, misuse and loss must be reported to your line manager, who is responsible for taking appropriate actions.

All inventions or discoveries made by employees in the course of the employment, and which are within our business scope, will be the property of the Rimaster Group. Copyright, patents or any other intellectual property right on any work produced by employees in the course of employment, and which are within our business scope, will belong to the Rimaster Group.

Third party suppliers, consultants and other business partners shall sign a non-disclosure agreement (NDA) stating that all their work, results and documentation legally are considered as property of the Rimaster Group.

### 8.2 Data privacy

We take privacy rights seriously and we are committed to international compliance with data privacy laws, e.g. GDPR in the European Union. We only collect, store and use data that identifies an individual person, whether an employee, a customer or otherwise, in a lawful and transparent manner.

We have routines, instructions etcetera in place that must be consistently applied when processing personal data within the company. These documents are found in our Quality Management System (QMS).

### 8.3 Communication and social media

Communication is an important tool for managing our company internally and externally. All communication on behalf of, or in the name of the company, shall be planned to the extent possible in the context of our strategic objectives and designed to create the best possible result, following our graphic profile.

When we communicate both internally and externally, we shall always engage in truthful, factual and well balanced communication. After having discussed with the Chairman of the Board of Rimaster AB, the Managing Director of each unit is responsible for the communication with media.

Our electronic communication tools should not be utilized to conduct any activity that violates any law or regulation or jeopardizes the security or reliability of the company's records or data, including trade secrets and other confidential business information.

If you identify as a Rimaster employee on social media, then information that you share about our company may be viewed as an official message from Rimaster. This means that you need to follow this Code, including:

- Protecting the confidentiality of business information.
- Avoiding disparaging, discriminatory or harassing comments towards other employees, customers or business partners.
- Avoid to use Rimaster's logos in a manner that would mislead or confuse the public.

### 8.4 Information security

To prevent improper dissemination of business-related or personal information, you as a Rimaster employee should:

- Protect your user account by never sharing the access details, such as password or other authentication, with anyone.
- Be aware of where you are and if anyone may be able to hear you. Avoid discussing non-public information in public areas such as on plane, in trains or elevators.
- Maintain adequate document control by ensuring that information is properly protected in storage and during distribution.
- Understand that unauthorized forwarding of Rimaster e-mails may be a breach of confidentiality. This includes forwarding to your own private e-mail address.
- Ensure that a suitable confidentiality agreement is in place with a business partner before sharing confidential information.
- Not share sensitive information via unmanaged services, social media or external channels.
- Not store sensitive information on unauthorized external cloud storage and services.
- Maintain confidentiality, not only while employed with Rimaster but also after the employment relationship has ended.
- Protect sensitive information stored in external storage equipment from unauthorized access by using protection tools. Contact our Helpdesk for assistance. This not only includes computers

and laptops, but also USB sticks, external hard drives, smartphones and any other device where storage of electronic information is possible.

We also have an obligation to protect the information entrusted to us by our customers and other business partners. You must never share partner or customer information externally unless explicitly authorized or if you are required to do so by law.

See our "IT Policy" (see G\_R\_015 IT policy) for further details. This policy will during this year (2024) be complemented with an "Information Security Policy".

## 8.5 Electronic devices

Although we acknowledge that company-owned computers, mobile devices and other IT equipment may occasionally be used for private purposes, this equipment is supplied for professional use and you shall respect the following:

- Be particularly cautious when using social media or entertainment services on company computers and IT systems.
- Do not install unauthorized software on your Rimaster devices.
- Do not use company-owned electronic devices to access illegal content that is in violation of local laws or our values.
- Do not stream, download or store pirated music or other types of digital entertainment on your Rimaster devices.
- Avoid using your Rimaster e-mail address and password to register in external forums, thus representing Rimaster, if such a forum is outside our business scope.
- At any time and place (home, office, during travel) protect the access to your Rimaster devices and stored information by not sharing or allowing access to them for unauthorized parties.
- Ensure that you return electronic equipment, such as a PC or a mobile devices, to your local IT once you have received a replacement.
- It is your responsibility to protect electronic equipment from physical damage, theft, or loss of Rimaster data stored in the devices.

See our "IT Policy" (see G\_R\_015 IT policy) for further details. This policy will during this year (2024) be complemented with an "Information Security Policy".