

Rollepaal Compass

Working with a deep understanding of our customers challenges



Message from the CEO

Doing things right is very important at Rollepaal. We endeavour to do our utmost every day to ensure we provide our customers with the best material-saving solutions.

When we talk about doing this right, we do not only refer to providing products which are known for their quality, durability and reliability. We also mean that every step taken in making those products, is taken with integrity and ethics in mind.

All our solutions are recognised for their innovation and in-depth understanding of our customers challenges and needs.

We only source materials from suppliers who work to the same high environmental ethics as we do. Working together with suppliers, customers and the environment, represents our standard of high level of services.

This will ensure a high integrity supply chain and enabling our entire operation to adhere to our code of conduct.

Working at Rollepaal means following the code of conduct guidelines in this document and engaging to uphold our company values. We would like to thank our employees for helping us to be the best product supplier we can be.



Henk Hoven
CEO Rollepaal Pipe Extrusion Technology

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Introduction

All of the employees, managers and executives of Rollepaal Pipe Extrusion Technology within all of the locations (Baltimore, Ahmedabad and Dedemsvaart) are expected to observe and follow Rollepaal's Code of conduct. Our core values and code of conduct collectively provide an important compass for our employees, to help and ensure ethical and high-integrity behaviour in their daily activities.

Mission

Rollepaal Pipe Extrusion Technology is a specialist in supplying pipe extrusion lines and components of extrusion lines to PVC pipe suppliers. Our mission is directly linked to the United Nations Sustainability Development Goal #6 (Clean water and sanitation for everyone) through the supply of innovative pipe extrusion technology. At Rollepaal, we are proud that our expertise and knowledge allow us to be the frontrunner in providing our customers with the best material-saving solutions. We are recognised for our innovation and our products are known for their quality, durability and reliability. We operate in a global, complex, fast-moving and ambitious market in close cooperation with our stakeholders, which include our people, our customers and our shareholders.

Core values

	From	>	To
Customer focus	craftsmanship as the highest priority		How does craftsmanship deliver excellent value to the customer?
Ambition	'it happens to me'		'I have a choice'
Communication	talking about one another		talking to one another
Collaboration	vague promises		explicit agreements and holding one another accountable

People

Rollepaal's uniqueness lies in the fact that we have a solid history as part of a major PVC pipe manufacturer. Our people have strong and dedicated upstream and process knowledge. One of our core values states that we share knowledge and experience and keep motivating each other to an optimal end-result. We are dedicated to keep our people safe, to treat them fairly and to provide a full array of development options and to enhance their skills and knowledge. Our aspiration is to be a fast, efficient, ambitious and high-trust organisation – a magnet for young and diverse talent.

Shareholder

Rollepaal is part of Hydratec Industries NV, a globally-operating, stock-listed specialist in industrial systems and components with a focus on the agri&food, automotive and health tech markets. We aim to be a transparent and reliable long-term partner for our shareholders, rewarding them with excellent business results.

Customers

Rollepaal will closely partner and communicate with our customers to obtain a deep understanding of their challenges. Using our knowledge and customer insights, we develop matching product and service options. We win by developing the best cost and material-saving solutions available. This means the highest rate of innovation in the industry in order to create a healthy, high-margin industry with an impact and positive attention.

Proper Governance

All of our employees are expected to observe and follow Rollepaal's code of conduct. Our core values and code of conduct collectively provide an important compass for our employees, to help ensure ethical and high-integrity behaviour in their daily activities. Employees must honour and be in compliance with this conduct and we encourage them to consult others and speak up.

How we demonstrate our principles

- ☞ We act professionally in the best interest of Rollepaal and its stakeholders.
- ☞ We speak up.
- ☞ We are accountable, honest and considerate and act with integrity.
- ☞ We avoid situations that could be perceived as improper.
- ☞ We maintain an awareness of actual or potential conflicts of interest.
- ☞ Our decisions are not influenced by personal relationships or (personal) financial considerations.
- ☞ We commit to raising issues that (i) violate the law, (ii) are actual or potential conflicts, (iii) are improper, (iv) are unethical, or (v) are not aligned with our code of conduct and values.



In short

- ☞ Speak up
- ☞ Be professional
- ☞ Be accountable, be honest, be considerate and act with integrity
- ☞ Make decisions in the best interest of the company
- ☞ Maintain an awareness of actual of potential conflicts

The primary purpose of this code of conduct is a positive one, i.e. for our employees to use this as a guideline when in doubt. Rollepaal also encourages our employees to consult others and speak up. Unfortunately it is also essential to have a disciplinary code and procedure, which is fair, just and equitable for all employees in the organisation. For the procedure we would like to refer to the employee handbook.

Rollepaal has made a conscious decision to ask all staff, which are, as part of their role, in direct contact with customers, agents and suppliers and all management staff only, to sign the Code of Conduct.

Environment

At Rollepaal, we are deeply committed to reducing our environmental footprint and contributing to the realization of the 2030 Agenda for Sustainable Development Goals (SDGs). Our core business activity – the manufacturing and supply of material-saving solutions for the production of plastic pipes – directly aligns with SDG 6: ensuring clean water and sanitation for all.

The crux of our technology is the reduction of new material per meter of pipe. We understand the critical importance of preserving our environment for future generations, and we strive to incorporate sustainability into every facet of our daily operations. We recognize the significance of conserving natural resources. To achieve this, we prioritize the reduction and reuse of raw materials in our daily work operations. By doing so, we aim to minimize waste and promote responsible consumption, in line with the SDGs.

We are committed to reducing our greenhouse gas emissions by improving our energy and water management practices. In addition, we aim to reduce our electric energy usage with 5% per year compared to our baseline year of 2023.

As responsible corporate citizens, we are dedicated to being a 'good neighbor.' This means taking our immediate environment into consideration and minimizing any potential disruptions to our neighbors' lives. Our goal is to have zero community complaints related to our operations.

How we demonstrate our principles:

Maintaining Our Facilities:

We maintain our buildings and grounds, ensuring they are in good condition. This not only enhances the aesthetics of our premises but also minimizes any negative impact on the local environment.

Waste Management:

We actively promote responsible waste management practices, which includes the separation of waste materials. Additionally, we have positioned all our manufacturing activities indoors to prevent noise pollution.

Resource Conservation:

To avoid unnecessary wastage of water and energy, we conduct product testing at a dedicated and efficient location. This helps us reduce our resource consumption while maintaining high product quality standards.

Community Engagement:





We actively engage with our local community by participating in various activities and events. Additionally, we selectively open our company for visits, educational tours, and training courses to create awareness and promote a sustainable mindset among our neighbors, schools, and potential future employees from the region.

Product end of life:

While we are currently in the process of developing specific practices, we are committed to responsibly managing our products at the end of their lifecycle. We aim to explore recycling, reuse, and safe disposal options in compliance with regulations, and we will provide updates on our progress in this area.



In short:

-  Maintain our buildings and grounds
-  Communicate correctly
-  Save energy and use water wisely
-  Participate in school visits and local activities

Ethics

Rollepaal provide a safe and healthy work atmosphere in which every employee is valued. We respect one another and our different social and cultural backgrounds and avoid socially unsafe situations. By remaining in constant dialogue with one another, we continue to create value for our employees by offering a good work-life balance in addition to income. By offering appropriate, challenging terms and conditions of employment, a good workplace and environment, we motivate each other to help ourselves and the organisation move forward. We offer employees the opportunity to develop themselves via training and the improvement of (technical) skills.

Laws and Regulations

Rollepaal operate in full compliance with all applicable local, state, and international laws and regulations, and adhere to internationally recognized environmental, social, and corporate governance standards in India, the USA and the Netherlands. We use our best efforts to implement these standards for the countries in which we sell or maintain our customer's equipment only.

Health and Safety

Rollepaal provide their staff with a clean, safe, and healthy work environment in compliance with all applicable standards and facility or process specific requirements for workplace health and safety, including those of the country of operation. Rollepaal will make sure customers will provide Rollepaal service staff a safe and healthy work environment.

We have adequate management systems for environmental, health and safety and must provide our employees with adequate training of management systems and processes.

Inclusion and Diversity

Rollepaal will treat employees with respect and dignity, encourage diversity of the workforce, promote equal opportunity and equitable treatment for all, and foster an inclusive and ethical culture. An inclusive and diverse workforce and supply chain contributes different perspectives and innovative ideas and solutions that enable us to improve every day. We ensure that women workers receive equal treatment in all aspects of employment.

Internal Issue resolution – Anti-Retaliation

Rollepaal maintain an adequate system to address employee grievances and resolve disputes in such a way that prevents retaliation, protects employee privacy, and allows for anonymous reporting of grievances. Members of the management must be trained to this process and this process must be communicated to all employees.

Product Stewardship

Rollepaal provides products that, at a minimum, comply with all applicable regulatory requirements. Our products perform as claimed with regards to performance and safe use. Products match the claimed material composition. We document evidence that substantiates compliance with all applicable regulatory rules and regulations.

Protection of Information, Data Security and Confidentiality

Rollepaal operate in compliance with the EU regulations on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and this is applicable for our own employees as well as any third party we operate with and for. All information, drawings, materials, goods, and equipment provided by the customer or arising from work or services performed for or on behalf of any third party shall be treated as confidential and proprietary and shall not be disclosed or shown to any other third parties without prior written permission. We safeguard and protect Rollepaal's, any customer and supplier information, electronic data, and intellectual property or technologies, with appropriate safeguards.

How we demonstrate our principles

- ☞ We talk with one another, not about one another.
- ☞ We are aware of our different backgrounds and treat one another with respect.
- ☞ We are curious about one another, express ourselves and strengthen one another.
- ☞ Each of us takes responsibility for every step of improvement in order to continue to develop and challenge one another.
- ☞ We always provide a safe working environment. Be aware of dangerous situations and make these open for discussion.
- ☞ We work according to our core values.

Our goals

- ☞ In line with the Hydratec goals Rollepaal aims to increase diversity and our target is that 25% of the workforce are women.
- ☞ Zero ethics incidents (such as but not limited to harassment, personal data leaks, unbiased hiring or promotion).
- ☞ Bi-annual external equal gender pay research.
- ☞ Annual Rollepaal Ethics training for all staff.



In short

- ☞ Have an understanding of other opinions
- ☞ Take responsibility for your own actions
- ☞ Make clear agreements and honor them
- ☞ Report dangerous situations
- ☞ Invest in a comfortable environment for everyone

We compete fairly

We support free market mechanisms and the underlying legal and statutory base. It is our duty to conduct business fairly and honestly so that we can build open and long-lasting relationships with our partners. In the best interest of our colleagues and our company, we must act according to the existing legislation that prohibits trade limitations, detrimental economic activities and unfair, misleading and unethical business practices. We cannot allow personal interests to cloud our judgement. To analyse our compliance risks we quarterly prepare and document the standard Fraud Risk Assessment.

Trade Compliance

Rollepaal complies fully with all trade laws and customs regulations applicable in the countries where we do business and, except where prohibited by applicable law, with the Dutch (European Union) laws and regulations. Rollepaal investigates with whom they are dealing and must not engage in or facilitate business with entities or any other individuals that are subject to trade embargoes, economic sanctions ([EU Sanctions Map](#)), or other restrictive trade measures imposed by local law or, except where prohibited by applicable law, the European Union (https://www.eeas.europa.eu/eeas/european-union-sanctions_en) or the United States. Rollepaal will never seek to mislead or improperly or illegally avoid the payment of import duties, taxes, and fees, and never engage in activities meant to evade the legal requirements of international traffic and trade.

Anti-Money Laundering

As Rollepaal does business in approximately 70 countries around the globe we understand the importance of our role in knowing our customers and our representatives or agents. Rollepaal is required to understand the nature of a client's and/or agent's activity and verify deposited funds are from a legitimate source and we only do business with people and companies we have verified as being trustworthy. This includes carrying out customer and/or agent due diligence checks, updating customer and/or agent files, screening customers and/or agents and customer transactions, monitoring transactions and reporting suspicious activities.

Anti-bribery and Corruption

Rollepaal has zero tolerance for bribery and corruption of any kind and in any form. We act with utmost integrity, honesty, and transparency, and must comply with all applicable anti-bribery and anti-corruption laws. Directly or indirectly offering, authorizing, promising, giving, accepting, soliciting, or receiving anything of value to improperly influence someone or gain an improper or unlawful advantage can be considered a bribe and is prohibited.

Antitrust and Competition

Rollepaal complies with all applicable antitrust and competition laws which prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or unreasonably reduce competition without providing beneficial effects to consumers. Activities such as price-fixing, bid-rigging (collusive tendering) and market/customer allocations are all strictly prohibited.

We compete fairly for our business opportunities. We do not offer or approve anything of value in order to gain an unlawful advantage. We do not give or offer gifts, travel or entertainment to gain a business advantage. And gifts of cash or cash equivalents are never acceptable.

A bribe is anything of value and may include, but is not limited to: (i) a kickback on the discount of a contract for products or services, (ii) in-kind payments or donations of non-cash items of value such as airline tickets, job offers, gifts, dining vouchers and entertainment, (iii) agreements with government officials for product, service or employment where we do not follow our normal procedures and (iv) sponsorships, donations or charitable contributions outside the company's giving guidelines.

Sometimes, we may use third parties to help us achieve our goals: dealers, agents, freight forwarders, consultants or independent contractors. When third parties act on our behalf, we expect them to reflect our ethical standards. We may never use third parties to pay bribes or engage in corrupt behavior on our behalf. Authorized employees only will approve and manage third parties.

Conflict Minerals

Rollepaal will not source products that use raw materials that directly or indirectly contribute to armed conflict or human rights abuses in any of its products. Rollepaal Suppliers must implement a risk assessment of all conflict minerals sources and develop an appropriate risk mitigation strategy for those suppliers identified as "high-risk".

How we demonstrate our principles

- ☞ We perform appropriate due diligence on customers, agents and partners prior to entering into a business relationship with them.
- ☞ We price our products and services competitively and fairly and promote them accurately and honestly.
- ☞ We gather competitive information using only legal and ethical methods.
- ☞ We avoid formal and informal agreements with our competitors that may hinder competition.
- ☞ We provide only honest and truthful information to our business partners and suppliers, never knowingly providing inaccurate information to gain an advantage.
- ☞ We comply with local laws and regulations.
- ☞ We abstain from corrupt practices and never pay or accept bribes or kickbacks.
- ☞ We make sure any gifts and or hospitality we offer are reasonable and appropriate.

Our goals

- ☞ Zero fair business incidents (such as but not limited to fraud, bribes, kickbacks and inappropriate gifts).
- ☞ 100% Trade law compliance.
- ☞ Annual Trade Compliance training for commercial and supply chain staff.



In short

- ☞ Treat customers and suppliers fairly
- ☞ Provide them with truthful information
- ☞ Negotiate lawfully and honorably
- ☞ Secure contracts matching with our ethical standards
- ☞ Do not pay or accept bribes or kickbacks
- ☞ Act in the best interest of the company

Good employment practice

To be a good employer contains the provision of social security, the practice of social dialogue, health and safety at work and the promotion of personal development. Our employees are of the most importance to our organisation. We therefore want to create a work environment that offers all employees the opportunity to work optimally and to contribute to Rollepaal's success. We value personal integrity and believe that performance is best judged on the basis of long-term results. Rollepaal promotes a culture of diversity and inclusiveness in which all employees are able to do their best.

To be sure of creating an environment to work for all our employees we make sure that we have a social dialogue with our employees. That's why listening to the feedback of the organization by employee satisfaction surveys is very important. When changing policy has his effects on the employment conditions we have to make sure that our Work Council has been informed about it or has consented the changes.

We stand for living wages to provide the employee and her/his family with a decent standard of living. That includes food, water, housing, education, healthcare, transportation, clothing and other essential needs. For every employee the employment conditions are based on the local laws and regulations and also the tax and needed insurances.

We stand against any form of child labour, forced labour or human trafficking. To make sure that this will not happen we have a recruitment and selection policy.

How we demonstrate our principles

- ☞ Ensuring a culture in which colleagues can express themselves freely and share their concerns.
- ☞ Ensuring a safe work environment.
- ☞ Preventing our colleagues and others from being exposed to hazardous substances.
- ☞ Taking safety and well-being into account from the start of our projects to their completion.
- ☞ Making safety and well-being an integral part of our service provision so that our projects are safe to create, use and maintain.
- ☞ Being aware of signals and threats and reporting and analysing them in order to continuously improve ourselves, share the lessons learned and act upon them.
- ☞ Creating an atmosphere of trust and open, honest communication.

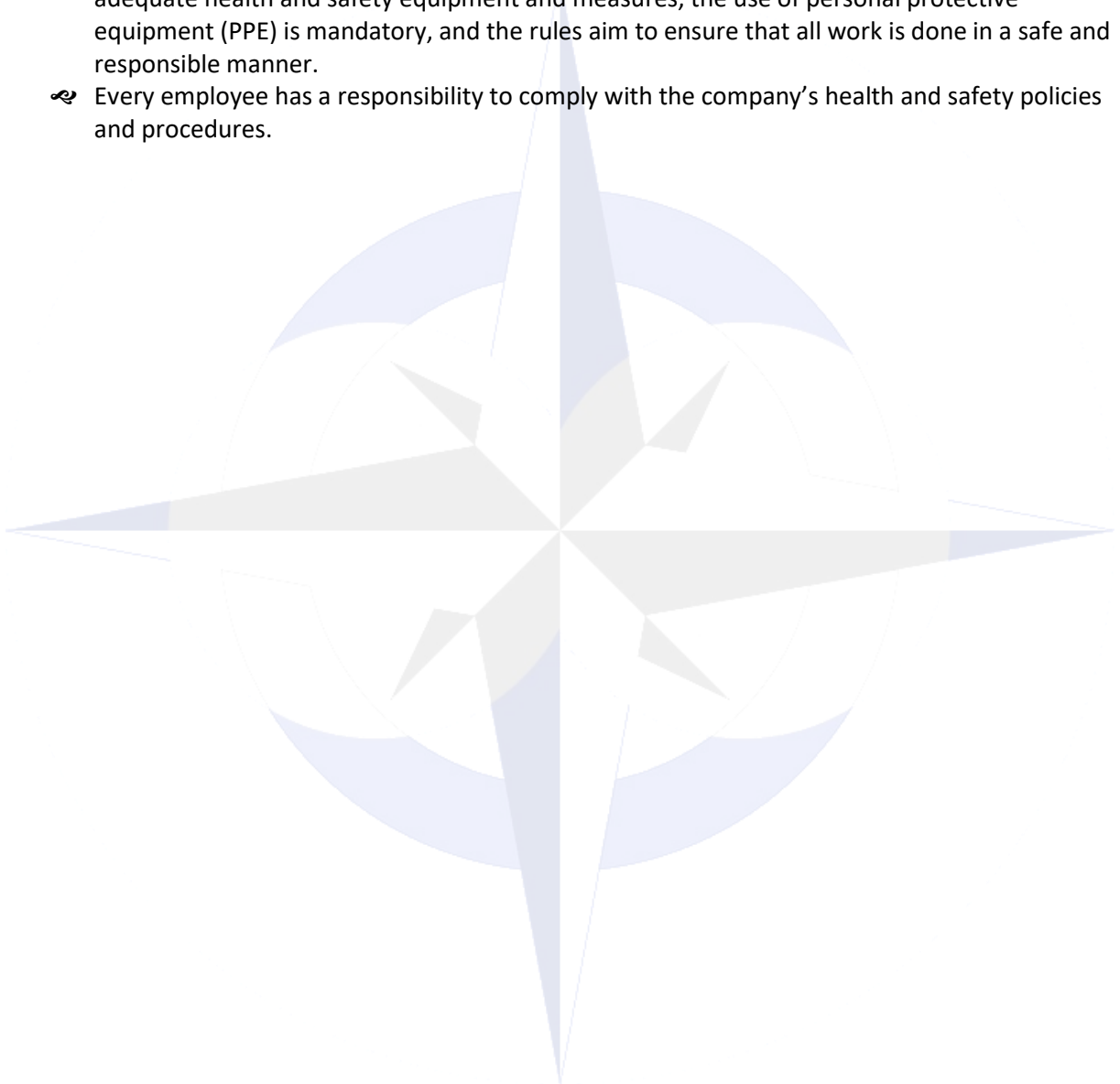
Our goals

- ☞ Zero child labour, forced labour or human trafficking.
- ☞ Zero employment incidents (such as but not limited to harassment, personal data leaks, unbiased hiring or promotion).
- ☞ Diverse and safe workspace for every employee.



Our compass to be a good employer

- ☞ We are aware of everyone's need for a work-life balance.
- ☞ We also respect the privacy of our employees and do not store any information about employees beyond what is necessary for the company's business activities and what is required by law.
- ☞ Rollepaal aims to create a safe and healthy work environment for all employees, visitors, contractors and suppliers. In order to create an environment without threats, violence or intimidation, we have a zero-tolerance policy for all acts of violence.
- ☞ We comply with health, safety and environmental laws and regulations, we provide adequate health and safety equipment and measures, the use of personal protective equipment (PPE) is mandatory, and the rules aim to ensure that all work is done in a safe and responsible manner.
- ☞ Every employee has a responsibility to comply with the company's health and safety policies and procedures.



Supplier Cooperation

As reflected in the previous chapters, Rollepaal stands for responsible business: doing things right and according to our code of conduct. Our suppliers play an integral part in our business success. Cooperation and partnerships create lasting business relationships which are mutually beneficial. In applying the sustainability requirements, we are aware of our responsibility for the economic, ecological and social impact of our actions. We also expect this from our suppliers, particularly where human rights, health & safety at work, environmental protection and combatting unfair market behaviour are concerned.

How our suppliers demonstrate our principles:



Regarding the human rights and labour rights of employees, our suppliers...

- ☞ Commit to no slavery and no human trafficking.
- ☞ Prohibit and refrain from any kind of forced or child labour.
- ☞ Ensure no discrimination and harassment.
- ☞ Respect employee rights with regard to collective bargaining and freedom of association.
- ☞ Fully comply with applicable national statutes on working time.



Regarding environmental protection, our suppliers...

- ☞ Comply with all applicable environmental laws and regulations in all counties in which they operate.
- ☞ Create and apply environmental management systems.
- ☞ Have an active approach to environmental challenges, make efforts on the avoidance of damage to the environment and health.
- ☞ Use energy, water and raw materials efficiently.
- ☞ Avoid waste: recycling, the re-use of resources and the safe, environmentally-friendly disposal of residual waste, chemicals and wastewater must be taken into account in development, production, product service life and subsequent end-of-life recycling as well as in other activities.



Regarding fair market behaviour, our suppliers...

- ☞ Make decisions solely on the basis of objective criteria and are not influenced by financial or personal interests or relationships.
- ☞ Do not tolerate corrupt practices.
- ☞ Respect fair and free competition.
- ☞ Commit their employees to keeping business secrets confidential.
- ☞ Ensure compliance with the applicable legal provisions against money laundering.

Related to applying the sustainability requirements, our procurement team is aware of our responsibility for the economic, ecological and social impact of our actions.

How we demonstrate our principles

- ☞ Reuse of packaging/returnable packaging, or at least made of renewable resources.
- ☞ Consider to source locally the products which require many loading meters in transportation.
- ☞ Group shipments from supplier up to a maximum of once per week or less.
- ☞ Investigate proactive the use of circular materials in the (to be) procured items, as possible input for design for circularity.

Code of Conduct Application and Acknowledgement

Reporting

This code of conduct complies with the Internal Reporting Procedure in accordance with the EU Whistleblower Protection Directive. You can report in writing, by telephone or, on request, within a reasonable period of time by means of an on-site interview. The annex lists where, if necessary, external reports can be made.

Application

We encourage all employees or other stakeholders to ask questions and raise issues without fear of retaliation and we are committed to treat reports seriously and investigate them thoroughly. We advise you to report unethical, illegal or suspicious behaviour immediately. Rollepaal does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit. Of course you can confide in an external advisor.



To report a concern –please follow one of the next steps:

- Talk to your manager or your contact at Rollepaal (when you're not an employee)
- Contact the Human Resources Representative
- Call the independent confidential adviser vertrouwenspersoon@rollepaal.com
- Email your concern to: concern@rollepaal.com

Acknowledgement

By certifying to the company code of conduct, you acknowledge that:

- You have read the entire code of conduct and understand your responsibilities related to it.
- You have had the opportunity to ask questions to clarify any unclear aspects of the code.
- You agree to abide by its principles.
- You agree to report to the company any violations of the code.
- You agree to cooperate in any investigations of violations of the code.

I hereby indicate that I agree with and commit to the Rollepaal code of conduct.

Signature

Name:

Date:

Appendix

To report a suspicion of wrongdoing externally, you can contact the following competent authorities:

- het Huis voor klokkenluiders (HvK):
[Ik vermoed een misstand | Huisvoorklokkenluiders.](#);
- de Autoriteit Consument en Markt (ACM):
[Bescherming klokkenluiders | ACM.nl](#);
- de Autoriteit Financiële Markten (AFM):
[Bescherming klokkenluiders \(afm.nl\)](#);
- de Nederlandsche Bank N.V. (DNB):
[Contact en veelgestelde vragen \(dnb.nl\)](#);
- de Inspectie gezondheidszorg en jeugd (IGJ):
[Melden over uw werkgever \(klokkenluidersmelding\) | Inspectie Gezondheidszorg en Jeugd \(igj.nl\)](#);
- de Nederlandse Zorgautoriteit (NZa):
[Meldpunt misstanden bij zorgaanbieders of zorgverzekeraars \(klokkenluiders\) | Contact | Nederlandse Zorgautoriteit \(nza.nl\)](#);
- de Autoriteit Nucleaire Veiligheid en Stralingsbescherming (ANVS):
[Overtreding of misstand melden | Autoriteit NVS](#);
- de Autoriteit persoonsgegevens (AP):
[Autoriteit Persoonsgegevens |](#)
- de Inspectie Leefomgeving en Transport (ILT):
[Home | Inspectie Leefomgeving en Transport \(ILT\) \(ilent.nl\)](#);
- de Nederlandse Arbeidsinspectie (NLA):
[Home | Nederlandse Arbeidsinspectie \(nlarbeidsinspectie.nl\)](#);
- de Nederlandse Voedsel- en Warenautoriteit (NVWA):
[Home | NVWA.](#)

The above mentioned authorities all have their own area in which they are authorized to investigate the report. If no specific supervisor is mentioned, the Whistleblowers Authority may investigate a report.