



Code of Conduct

TheRockGroup Holding B.V.

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Scope

This Code of Conduct applies to all entities who engage with TheRockGroup in any capacity, including but not limited to:

- **Employees:** all full-time, part-time, and temporary employees of TheRockGroup.
 - **Contractors and consultants:** individuals or entities providing services to the organization under a contractual agreement.
 - **Interns, trainees, and volunteers:** individuals contributing their time, skills, or knowledge to the organisation (without financial compensation).
 - **Board members and leadership:** members of the board of directors and other governance roles who influence the strategic direction of the organization.
1. **Third-party partners:** vendors, suppliers, and other external stakeholders with whom the organisation collaborates to achieve its goals.
 2. **Customers:** all undertakings TheRockGroup will provide paid services to
 - **Society:** the broader community, public and surrounding (including nature) with whom TheRockGroup interacts, ensuring that the organisation upholds its values and ethical standards in its impact on society, including environmental, cultural, and social aspects.
 - **Nature:** TheRockGroup recognizes that we are a part of nature and interact with it.

Applicability

- This code governs behaviour and decision-making during all work-related activities, whether conducted on or off organisational premises.
- It applies to interactions with colleagues, clients, stakeholders, and the general public.
- The code encompasses both in-person and virtual interactions, including communications via email, social media, and other digital platforms.

Geographic scope

- The code applies to all activities conducted under the organisation's name, irrespective of location, including international operations or collaborations.

Amendments

3. This code is subject to periodic review every 2 years and may be updated to reflect evolving organisational goals, regulations, and societal expectations.

By defining a broad and inclusive scope, this Code of Conduct ensures that everyone associated with TheRockGroup upholds its values and ethical standards.

TheRockGroup Holding's core principle we apply to the Code of Code

We expect employees to hold colleagues accountable and speak up when you encounter ethical dilemmas or difficult situations. This is how we can make sure everyone complies with the code. The code explains how employees of TheRockGroup should live our values in practice. It helps us to foster a great culture within which everyone wants to work. Applying this to our own behaviour is fundamental. The reputation and brand of TheRockGroup is demonstrated on the ground by each one of us every single day.

As a sustainability consultancy, we take all breaches seriously and undertake appropriate action to uphold the code wherever necessary to maintain our positive impact and the trust of our business partners. The code is a practical guide to what is expected at TheRockGroup. It helps us navigate difficult choices and make the right decisions in line with our values. It explains how we live our values and highlights some of the mistakes and behaviours. TheRockGroup Holding supports and refers to the following international principles in its work:

- United nations (UN) universal declaration of human rights
- International labour organization (ILO) conventions and recommendations
- UN guiding principles on business and human rights (UNGP)
- UN sustainable development goals (SDGs)
- UN children's rights and business principles
- OECD guiding principles on responsible business conduct
- OECD sectoral guidance documents
- The convention on biological diversity (CBD)

Respecting rights of nature

TheRockGroup recognises that nature has inherent rights to exist, thrive, and evolve. We believe that we are a part of nature and that it is in our best interest to let nature thrive, therefore we want to ensure that our business operations do not cause harm to the natural environment. To that end, we adopt the following policy in our own operations and try to influence our clients to do the same:

Respect for the rights of nature

We acknowledge that nature has the right to exist, flourish, and regenerate its vital cycles, and that these rights are independent of human use or benefit. We will respect and protect the rights of nature in all our business operations.

Prevention of harm

We will take all reasonable measures to prevent harm to nature caused by our business activities. We will assess and minimise the impact of our operations on the environment and strive to operate in a sustainable manner.

Following the highest standards of compliance

Sustainability legal framework is in constant evolution. We will closely follow all lawsuits and regulations related to environmental protection, including those that recognise the rights of nature to follow the highest standards of sustainability transition.

Stakeholder engagement

We will engage with nature as a stakeholder, to ensure that our business operations are respectful of nature and do not infringe on the rights of local ecosystems.

Responsibility and accountability

We will take responsibility for any harm caused by our operations to the natural environment, and we will be accountable for our actions.

Continuous improvement

We will continuously improve our environmental performance and strive to develop innovative solutions that minimise our impact on the natural environment.

Protection of human rights, anti-discrimination & anti-harassment

Anti-discrimination policy

TheRockGroup does not and shall not discriminate based on race, colour, religion (creed), gender, gender expression, age, national origin (ancestry), disability, marital status, sexual orientation, or military status, in any of its activities or operations. These activities include, but are not limited to, the appointment to and termination from its board of directors, hiring and firing of staff or contractors, selection of volunteers, selection of partners, and providing of services.

TheRockGroup strictly prohibits all forms of racism, sexism, homophobia, transphobia, ableism, and ageism. Discriminatory behaviour will not be tolerated.

TheRockGroup is an equal opportunity employer. We shall not discriminate and will not discriminate in employment, recruitment, board membership, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the basis of race, colour, religion (creed), gender, gender expression, age, national origin (ancestry), disability, marital status, sexual orientation, or military status, or for any other discriminatory reason.

Anti - harassment

Harassment of any kind is strictly prohibited in the workplace. Management is accountable for proactively preventing, addressing, and resolving any incidents of harassment. If an employee is being harassed (sexually, emotionally, physically) by another employee, or a

member of management, this policy stipulates that they must contact the next level of management and/or HR referent, lay a grievance and appropriate steps will be taken.

The complaint will be dealt with in a sensitive manner and the emphasis will be placed on protecting the rights of all the employees involved through handling the matter in a discrete and confidential manner. The appropriate authorities will initiate an investigation into the matter and if required will proceed with disciplinary action against the individuals concerned.

TheRockGroup views this offence in a very serious light and a guilty finding will lead to the strictest disciplinary measures being taken against the individual/s concerned. Employees are urged to always behave in a dignified and professional manner, considering the dignity and privacy of their fellow employees.

Inclusive working spaces

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievement as well. All individuals quoted in the scope of this Code of Conduct working with and/or on behalf of TheRockGroup have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. TheRockGroup recognises the diversity of its workplace, and it is committed to treating its employees fairly while ensuring that all employees can use their skills effectively and efficiently. TheRockGroup will do its best to provide all employees with the equipment, devices or workplace adaptations they need so they may contribute to the organisation's performance, production and service delivery. TheRockGroup will ensure that all provided workspaces are safe from harassment and adapted to the diverse scope of abilities.

Health and safety

At TheRockGroup, we are committed to ensuring the health and safety of our employees, contractors, clients, visitors, and the environment in which we operate. We recognise that promoting health and safety is not only a moral obligation but also a legal requirement. We strive to continuously improve our health and safety practices to prevent accidents, injuries, and illness.

Our health and safety policy is based on the following principles:

Identification and management of health hazards and risks

We will identify and assess all hazards and risks associated with our operations and activities and take appropriate measures to manage and mitigate them. We will involve our

employees and clients in this process and provide them with the necessary resources and support to work safely.

Promotion of a culture of (mental) health and safety

At our company, we prioritise both physical and mental health as key parts of a safe and supportive workplace. We will promote a culture of health and safety throughout our organisation, and encourage our employees, clients, and partners to take responsibility for their own physical and mental well-being and safety, as well as that of others. We will communicate our health and safety policies and procedures clearly and effectively and ensure that they are understood and followed by everyone.

Continuous improvement

We will yearly review and improve our health and safety practices and regularly monitor and report on our performance. We will set measurable objectives and targets and implement corrective actions when necessary.

Roles and responsibilities of TheRockGroup staff

TheRockGroup is committed to preventing discrimination, harassment and human rights violations through the following means:

Awareness

Ensuring that all staff, representatives and third parties connected to TheRockGroup are aware of the high standards of behaviour and conduct expected of them to protect human and nature rights.

Prevention

Ensuring, through awareness and good practice, that staff and those who work with TheRockGroup minimise the risks of human and nature rights violation, including but by no means limited to conducting relevant vetting and background checks as part of recruitment process and in case of high suspicion of staff.

Reporting

Ensuring that all staff and those who work with TheRockGroup are clear on what steps to take where suspicions or concerns arise regarding allegations of human and nature rights violations.

Responding

Ensuring that immediate action is taken to identify and address reports of human and nature rights violations and to ensure the safety and well-being of the victims involved. Aggregated data on human and nature rights incidents and risks are stored in our grievances database.

The director shall authorise and oversee a periodic review of the administration of this policy as required by legislation or experience. The review may be written or oral. The review shall consider the level of compliance with the policy, the continuing suitability of the policy, and whether the policy should be modified and improved. Any changes to the policy shall be communicated immediately to all employees.

Complaining mechanisms

Reports of suspicions of fraud, bribery or corruption are made to a relevant contact at TheRockGroup (which could include the country partner/director, project lead, or via our [Speak up platform](#) on our website. Any information will be kept confidential between the whistle blower and the person they report this to.