



Due Diligence for Responsible Business Conduct 2023

Roth Norge AS

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1. Preface

This report covers due diligence for responsible business conduct according to the OECD Due Diligence Guidance for Responsible Business Conduct¹.

Roth Norge AS has been in the plumbing industry for more than 25 years, and we sell and market complete underfloor heating and tap water systems for water and heating. Our products are sold through plumbing wholesalers, and the products are therefore easily accessible to plumbers. We are part of Roth Industries GmbH, and with our strong logistics and system solutions from our northern European head office in Denmark, we are well equipped for the Norwegian market.

As a responsible company, it is essential for us to respect human rights and decent working conditions in our own company and in our supply chain according to “OECD Due Diligence Guidance for Responsible Business Conduct”. We want to identify, prevent, and deal with actual or potential negative consequences for human rights and decent working conditions and to identify, prevent and deal with these consequences in a systematic and transparent way.

In line with the Transparency Act, we have carried out a due diligence assessment of our own business, our supply chain, and our business partners. A due diligence assessment is a process where we map, analyze, and prioritize the most important actual and potential risks to human rights and decent working conditions linked to our business. We have also considered what measures we can take to reduce or eliminate actual adverse impacts and potential risks, as well as how we can follow up and report on our work.

In this report, we present the results of our due diligence assessment, as well as our plans for further work with transparency and accountability. We want to share our experience and learning with our stakeholders, customers, suppliers, and society at large. We are also open to dialogue and feedback on our work, and we encourage anyone who has questions or concerns about our business to contact us.

¹ OECD (2018), OECD Due Diligence Guidance for Responsible Business Conduct, OECD Publishing, Paris. [OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf](#)

2. Enhancing Transparency: Understanding the Requirements of the Act

On July 1st, 2022, the Transparency Act came into effect, mandating organizations to enhance their transparency in the production of goods and services. The Act specifically targets the respect of fundamental human rights and decent working conditions in business operations. The Act aims to foster improvements in these areas and provide consumers with relevant information to make informed choices.

2.1 Fulfilling our Duty: The Importance of Disclosure

Organizations must publish an account of their due diligence assessments under §4.

The report must contain at a minimum:

- A comprehensive overview of the organization's scope of operations, policies, and procedures for addressing actual and potential negative implications on fundamental human rights and decent working conditions.
- Detailed insights into actual negative consequences and material risks uncovered through the company's due diligence efforts.
- Extensive coverage of the measures implemented or planned by the organization to address actual negative impacts or mitigate the material risks of negative consequences, including the results or anticipated outcomes of these measures.

Roth Norge AS's report for Due Diligence for Responsible Business Conduct is published on our website² in compliance with all relevant legal requirements. Our annual report provides clear references to the location of this information.

² <https://www.roth-norge.no/>

2.2 Scope of the Act: Activities and Processes Covered

As Roth Norge AS meets the requirements set forth by the Transparency Act, we are obligated to disclose relevant information in accordance with the law. Our disclosure pertains specifically to Roth Norge AS and covers the following aspects of the law:

- Our business activities, including the products and services we offer, as well as any supply chains or business partners involved in our operations, as outlined in §4b of the Act.
- Our supply chain is defined as any individual or organization involved in the production of goods or provision of services that are part of our operations, from the raw material stage onward, as defined in §3d of the Act.
- Our business partners are defined as any entities that provide goods or services directly to us but are not part of our supply chain, as outlined in §3e of the Act.

3. Taking Responsibility: Due Diligence in Our Operations and Supply Chain

Roth Norge AS acknowledges the potential negative impacts that our business practices may have on people, society, and the environment. Simultaneously, we recognize our potential to facilitate positive development throughout the supply chain. Therefore, we have formulated a comprehensive policy for Sustainable Business Operations, which works in conjunction with our Code of Conduct as guiding principles for our entire organization³. The company's work with human rights and decent working conditions is anchored in the Board of Roth Norge AS.

³ <https://www.roth-norge.no/om-roth/etiske-retningslinjer-i-roth-selskapene>



3.1 Embracing Accountability: Guided by Best Practices

Roth Werke, the parent company, has demonstrated its commitment to quality and the environment by obtaining certification in accordance with ISO 9001 for "Development, production and distribution of the product range energy systems, shower systems, and technical parts," as well as "Development, production and distribution of the product range water and sewage technology, storage and transport containers, and technical parts." Moreover, the company has also achieved certification in accordance with ISO 14001 Environmental Management System, showcasing its dedication to environmental sustainability.

3.2 Holistic Assessment: Identifying Potential Adverse Impacts on Human Rights and Working Conditions

Roth Norge AS conducts comprehensive due diligence assessments of the company's value chain to identify potential violations of universally recognized human rights conventions and accepted norms of decent working conditions. Our work is anchored in the UN Declaration for Human Rights and our Code of Conduct.

Activity	HR/ Code of Conduct	Supply Chain/ Suppliers
Mapping potential risks	<p>The work environment is measured by:</p> <ul style="list-style-type: none"> Employee development interview Staff handbook Health and safety organization Risk assessment (every 4th year) 	<p>As a part of the due diligence assessment, Roth Norge AS has conducted a risk assessment of its current suppliers and business partners.</p> <p>The factors considered in the assessment include:</p> <p>Commercial risk:</p> <ul style="list-style-type: none"> Supplier dependency Share of supplier cost <p>Ethical risk:</p> <ul style="list-style-type: none"> Risk of violations of fundamental human rights Risk of violations on decent working conditions <p>Based on the information collected, we have determined that no further follow-up is necessary.</p>



Supplier	Description	Commercial risk	Rating commercial risk: Supplier dependency, share of supplier costs, direct delivery (Critical = 1, Normal = 2, Negligible = 3)	Ethical risk	Rating ethical risk: Risk of violation of basic human rights and/or decent working conditions (High = 1, Medium = 2, Low = 3)	Need for further assessment/ measures (Yes/No)
Supplier A		1	Rating C	3	Rating A	No
Supplier B		2	Rating B	3	Rating A	No
Supplier C		2	Rating B	3	Rating A	No
Business Partner D		1	Rating A	3	Rating A	No
Business Partner E		1	Rating A	3	Rating A	No

3.3 Taking Action: Measures to Address and Mitigate Negative Impact in Line with Roth Norge AS Priorities

Roth Norge AS have created a checklist of questions regarding fundamental human rights and decent working conditions:

Informasjonskrav etter åpenhetsloven

Den 1. juli 2022 trådte åpenhetsloven i kraft. Loven skal fremme virksometers respekt for grunnleggende menneskerettigheter og anstendig arbeidsforhold, og sikre allmenheten tilgang til informasjon om hvordan virksomheter håndterer negative konsekvenser for grunnleggende menneskerettigheter og anstendige arbeidsforhold. Videre pålegger loven norske virksomheter til å gjennomføre aktsomhetsvurderinger av egen virksomhet, leverandører og forretningspartnere. Roth Norge AS er underlagt lovens bestemmelser.

For at Roth Norge AS skal kunne gjennomføre sin aktsomhetsvurdering best mulig, er det nødvendig å innhente informasjon fra virksomhetene som skal vurderes. Vi kjenner allerede våre leverandører og forretningspartnere, men for å sikre at vi sitter på korrekt og oppdatert informasjon, har vi behov for at spørreskjemaet under besvares og returneres.

Vi ber om at ferdig utfylt skjema signeres og returneres til Roth Norge AS innen 31. mai 2023 til; service@roth-norge.as

Våre forventninger

Våre leverandører og forretningspartnere skal respektere grunnleggende menneskerettigheter og ha anstendige arbeidsforhold, og opptre i tråd med gjeldende krav og lovverk til enhver tid. Det vil si at disse skal unngå å forårsake eller bidra til uheldig innvirkning på menneskerettigheter og arbeidsforhold. Leverandørene og forretningspartnere er ansvarlig for å adressere påvirkninger som de har forårsaket, bidratt til eller er direkte knyttet til.

I den forbindelse ber vi dere bekrefte følgende:

<input type="checkbox"/>	Vi kompensere ansatte rettferdig og rettidig med en sats som er lik eller høyere enn den lokale minstelønnen eller bransjestandarden, samt sikrer at daglig og ukentlig arbeidstid ikke overstiger gjeldende lovkrav, også når det gjelder overtid.
<input type="checkbox"/>	Vi har tilstrekkelige retningslinjer, rutiner og opplæring på plass for å sikre oppfyllelse av menneskerettigheter og anstendig arbeidsforhold.
<input type="checkbox"/>	Vi tolererer ingen form for tvangsarbeid, moderne slaveri eller barnarbeid.
<input type="checkbox"/>	Vi tolererer ingen form for umenneskelig behandling, fysisk avstraffelse, bruk av vold, trakassering eller seksuell trakassering, men bistår til å sikre respekten for personlig verdighet og personlig frihet.
<input type="checkbox"/>	Vi gir like muligheter for alle ansatte, diskriminerer ikke på grunnlag av etnisitet, kjønn, religion, seksuell legning, funksjonshemming, politisk tilhørighet, alder etc.
<input type="checkbox"/>	Vi sikrer et trygt og sunt arbeidsmiljø for alle sine ansatte og forebygger mot arbeidsrelaterte ulykker, skader og sykdom. Dette inkluderer å ha forsvarlig sikkerhetsutstyr for personell og maskiner.
<input type="checkbox"/>	Vi respekterer ansattes rett til å fritt omgås fagforeninger.
<input type="checkbox"/>	Vi gjør vårt ytterste for å sikre at egne leverandører og forretningspartnere respekterer menneskerettigheter og har rutiner for å evaluere og kontrollere risikoen i sin virksomhet.

Er det avdekket funn eller risiko for brudd i deres virksomhet tilknyttet grunnleggende menneskerettigheter og anstendig arbeidsforhold? I tilfelle, gi en kort redegjørelse på funn og tiltak.

Legg til tekst her.

Bekreftelse

Som leverandør eller forretningspartner av Roth Norge AS bekrefter vi herved overnevnte og mener således at vi oppfyller de forventningene som stilles til oss. Vi vil umiddelbart varsle Roth Norge AS dersom vi blir kjent eller mistenker brudd som er relevant å varsle om tilknyttet denne forespørselen.

Dato		Org.nr.	
Selskapsnavn		Tittel	
Navn			

This checklist is completed by suppliers or business partners that are not already in possession of documentation that demonstrate their compliance with fundamental human rights and decent working conditions. Examples of documentation requested:

- Codes of Conduct or similar policies outlining the commitment to respect human rights and decent working conditions.
- Documentation of due diligence processes addressing potential or actual negative impacts and human rights and working conditions.
- Evidence of compliance with relevant laws and regulations related to human rights and working conditions, such as labor laws and environmental regulations.
- Report of social and environmental performance, including the results of any audits or assessments conducted by third-party organizations.
- Any other relevant information that makes it possible for Roth Norge AS to assess the suppliers or business partners commitment to promoting respect for human rights and decent working conditions.

3.4 Monitoring Progress: Follow-up on Implementation and Results of Measures

Roth Norge AS has not identified any instances of risk of human rights violations or substandard working conditions. However, we remain committed to continuously improving our processes and mitigating potential risks. Therefore, we intend to implement the following measures to further enhance our risk reduction efforts:

Activity	HR/ Code of Conduct	Supply Chain/ suppliers
Action	<p>The company takes proactive steps to initiate and diligently follow up on measures after various assessments and interactions, including:</p> <ul style="list-style-type: none"> • Safety inspections • Performance appraisals • Employee satisfaction surveys 	<p>The company implements a comprehensive policy for procurement and supplier management, aiming to establish clear guidelines and procedures. This policy encompasses:</p> <ul style="list-style-type: none"> • Developing a robust purchasing and supplier follow-up policy.

	<ul style="list-style-type: none"> • Informal and formal cooperation with the safety delegate service and employee representatives <p>These initiatives ensure a comprehensive approach to addressing concerns and continuously improving the workplace environment.</p>	<ul style="list-style-type: none"> • Assess supplier declarations for relevant suppliers, ensuring compliance with required standards. • Conducting risk assessments when considering the replacement or establishment of new suppliers.
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3.5 Open Communication: Engaging with Affected Stakeholders and Licensees on Mitigation Efforts

The implementation of measures will be documented and included in the annual report. The results of employee satisfaction surveys are thoroughly examined and serve as a foundation for subsequent actions. Additionally, the company conducts an annual internal audit in compliance with the Internal Control Regulations to identify weaknesses in procedures and frameworks, which are then addressed and monitored accordingly.

For any inquiries or concerns regarding specific human rights due diligence, please feel free to reach out to our dedicated contact point:

Mail: service@roth-norge.no

Phone: [+47 67 57 54 00](tel:+4767575400)

We are here to address your questions and provide the necessary assistance in ensuring our commitment to human rights is upheld throughout our operations.



3.6 Transparent Approach: Addressing Negative Consequences through Effective Strategies

To ensure the privacy and legal security of all parties, Roth Norge AS takes breaches of policies and guidelines seriously. In cases where violations are detected at the system or organization level, we involve trade unions and safety delegations. Additionally, any such breaches are reported through our annual report. Our commitment to sustainability is outlined in our policy, which can be found on our website, along with our Code of Conduct and annual due diligence report.

3.7 Recovery and Replacement Plans as Needed

In the event that we become aware of any violations of human labor rights, either within our own organization, business partners or with one of our suppliers, we have established a clear protocol for action.

Our response includes the following steps:

Activity	HR/ Code of Conduct	Supply Chain/ Suppliers
Action	The company actively collaborates with employee representatives and trade unions to ensure effective cooperation. There are further well-established routines in place for diligent follow-up on potential cases.	The company is committed to working closely with the relevant suppliers to address any necessary recovery and replacement efforts. If deemed necessary, termination of the supplier relationship will be considered as an appropriate course of action. Furthermore, the company maintains liability insurance to safeguard its business operations.

Signatures:

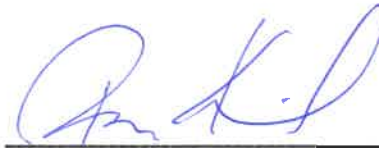
By signing below, the authorized representative of Roth North Europe AS confirms that they have reviewed and approved the content of this document, verifying that the information contained herein is true, accurate, and up-to-date to the best of their knowledge.

A handwritten signature in blue ink, appearing to read "Morten Øren", written over a horizontal line.

Morten Øren
Managing Director
Roth Norge AS

A handwritten signature in blue ink, appearing to read "Morten Nyvang Voss", written over a horizontal line.

Morten Nyvang Voss
Group CEO
Roth North Europe AS

A handwritten signature in blue ink, appearing to read "Per Kronil", written over a horizontal line.

Per Kronil
Group Market Director
Roth North Europe AS