

HUMAN RIGHTS POLICY

About Alutec

Uncompromising quality and safety characterize Alutec and our business. Our goal is to be a responsible actor that takes sustainability seriously. Alutec AS is a Norwegian business that manufactures and supplies Jamax scaffolding systems and Jamax floating piers from our locations at Os outside Bergen and in Kristiansand. In addition to our in-house manufactured main products, we also supply cranes and top-lifts from the German producer Böcker.

Jamax is a Norwegian-made scaffolding system that has been on the market for several years with users all over the country. More than 40 years of experience have made us the country's leading manufacturer and supplier of scaffolding. The Jamax scaffolding system is Norway's best-selling scaffolding. In addition, Jamax is a leader in floating docks from Rogaland up to the Møre coast.

Our Commitment

Our policy for basic human rights and decent working conditions explains our commitment, significant areas of risk, and how we work to implement our responsibility in practice. The policy further clarifies what we expect from suppliers, complementing our Code of Conduct for suppliers.

We comply with relevant national and international laws, rules, regulations, and norms in our daily business. As part of this commitment, we strive to implement our corporate responsibility to respect human rights in line with the United Nations Guiding Principles (UNGP) on Business and Human Rights and the OECD Guidelines for Multinational Enterprises throughout our operations.

We support the Sustainable Development Goals and respect all internationally recognized human rights, including the International Bill of Human Rights and the principles concerning fundamental labour rights set out in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

As set out in the UNGP, all companies have a responsibility to respect human rights, which means preventing and addressing negative impacts on people resulting from their business operations.

We undertake human rights due diligence to identify, prevent, mitigate, and account for how we address risks to people's human rights in our operations and our supply chain.

As required by the Norwegian Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the Transparency Act), we will publish an account on our human rights due diligence. Also, as required by the Transparency Act, we provide information about our human rights due diligence if requested by external parties.

Rev. 23.06.2023

Key human rights issues for our company

Our own activities

Alutec is committed to respecting the basic human and labour rights of our employees. We follow all relevant Norwegian legislation on the working environment, health, safety, and environment (HSE), diversity and anti-discrimination, employees' freedom of association and privacy. Our daily work in these areas is governed by our personnel handbook.

HSE, working environment and gender equality

All employees entitled to a working environment that provides for a health-promoting and meaningful working situation and security against physical and psychological harm. Our HSE procedures and personnel handbook ensure and safeguard HSE at our workplace.

Employees must be treated with respect and dignity. Unwanted strain, bullying and harassment are not accepted in our company.

Alutec has a goal of strengthening diversity across the company. This includes strengthening gender balance at management level and recruiting employees from different nationalities. The company works actively to ensure equal opportunities and rights and to prevent discrimination, and we follow the Norwegian Equality and Discrimination Act.

We respect the privacy of our employees, customers and suppliers.

Employees are encouraged to report concerns that may arise in the workplace. HSE incidents are reported via our internal HSE procedures. Our procedure for dealing with bullying and harassment or other inappropriate behaviour and ethical concerns is easily accessible to all employees.

Supply chain

Our largest suppliers are either Norwegian or European suppliers who are themselves increasingly subject to laws and regulations related to supply chain due diligence.

A challenge for effective supply chain due diligence concerns the complexity and multi-tiered nature of the supply chain for some of the products and raw materials that end up in our own production, often making availability of information beyond tier one difficult.

Rev. 23.06.2023

Global challenges in production and at raw material level

At Alutec we primarily use our own local production and Norwegian suppliers in our products. We have good overview of the parts of the value chain closest to us, which relate to purchasing, production, storage, sales, marketing, and delivery to the end customer. The risk of negative impacts on people and the environment is generally low in this part of the value chain. However, we are aware that there may be challenges further upstream in our value chain, both at production level and in connection with the extraction of raw materials.

Alutec is a small part of a global industry and value chain, where challenges exist both in production and at raw material level. Input factors such as steel and aluminium and underlying raw materials such as iron ore and bauxite can be linked to, among other things:

- Risk of forced labour
- Discrimination in the workplace, with regard to gender and discrimination against minorities
- Lack of freedom of association
- Health and safety in the workplace
- Working conditions, with regard to working hours and salary
- Risk of negative impacts on the local population, such as contamination of water and soil, loss of livelihoods, and forced relocation
- Negative impacts on indigenous peoples' rights to exercising traditional culture and livelihoods in connection with the extraction of raw materials

Traceability and information about the origin of these minerals and metals is a major challenge – for the entire industry and several other sectors. This is a challenge that no company can solve on its own and is a task that will take a long time to overcome.

Our expectations of suppliers

We take our share of the responsibility by setting clear expectations for our suppliers.

Alutec expects the same from our suppliers as we do from ourselves. This means that all employees and others affected by the business are treated with dignity and respect. We expect suppliers and other business partners to adhere to our Supplier Code of Conduct, which includes an expectation to adhere to global minimum standards, namely respect for international human rights and decent work standards, including the prevention and management of forced and child labour. We examine our suppliers on their commitment to human and labour rights and their own due diligence.

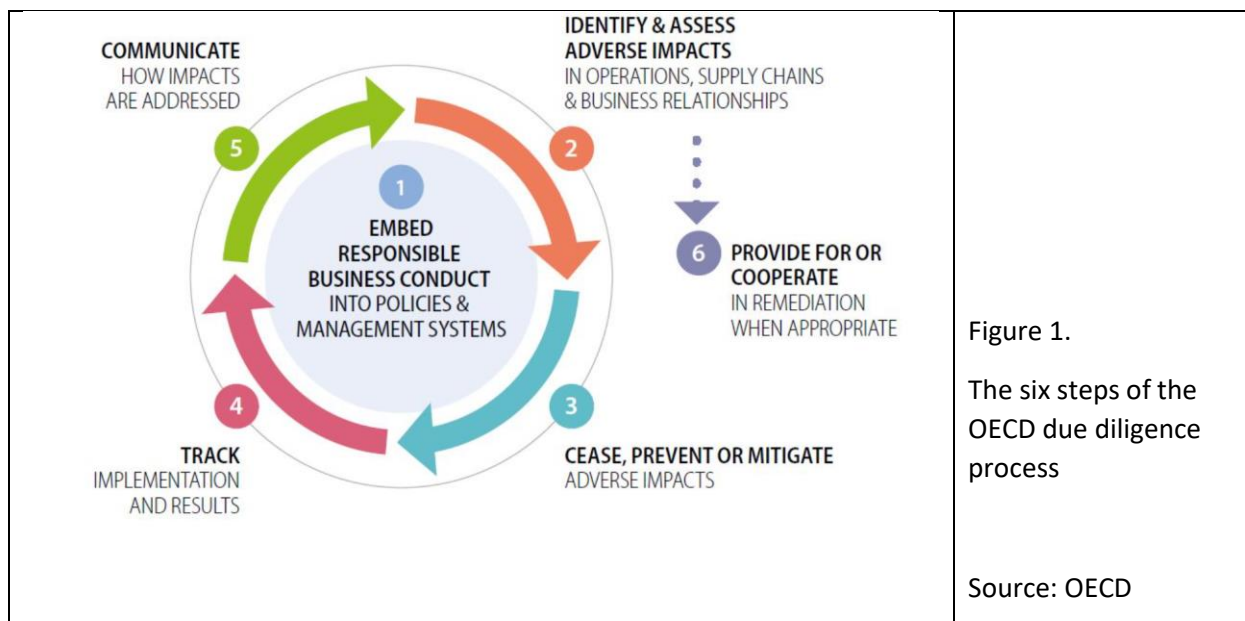
We also ask our suppliers to document their due diligence. If we identify direct links to serious human rights violations in any component of our products, we will enter dialogue with the supplier to address the issue. If identified abuses are not addressed and remedied after a reasonable period of time, contracts may be suspended or terminated.

Rev. 23.06.2023

Continuous due diligence

Our commitment to respect human rights and decent work standards is implemented in line with the UNGP and OECD Due Diligence Guidance for Responsible Business Conduct (figure 1). This implies, among other things that:

- The company’s management and board are responsible for overseeing implementation.
- Our commitment and related policy are embedded in the company’s management system and procedures.
- All employees are made aware of our responsibility and their role in contributing to its implementation.
- We carry out due diligence for our supply chain and demand the same from our suppliers.
- We establish procedures for regular due diligence and reporting in line with the Transparency Act.
- We follow up on information about negative impacts and significant risks for employees and others affected by our operations.
- We have a low threshold for addressing concerns, whether they arise internally or through our business relationships.
- Compliance with our policy for basic human rights and decent working conditions is reviewed annually.



Rev. 23.06.2023

Responsibility

The policy is approved by the board. The CEO is responsible for its implementation.

Transparency about our commitment to human rights

In accordance with the Transparency Act, we publish our due diligence account on our webpage. We update and publish the account yearly.

We respond to requests for information about our human rights policy and due diligence, in line with the information duty set out by the Transparency Act.

Contact: info@alutec.no

References

[UN Guiding Principles on Business and Human Rights \(UNGPs\)](#)

[OECD Guidelines on Responsible Business Conduct](#)

[OECD Due Diligence Guidance for Responsible Business Conduct](#)

[Norwegian Transparency Act](#)

Approved by the board: 22.06.2023

Rev. 23.06.2023