

CODE OF CONDUCT FOR SUPPLIERS

Our approach to a responsible supply chain

Alutec is committed to responsible business conduct and to contributing to a sustainable value chain. We seek to prevent, address, and reduce negative impacts on people and the environment that may arise in the context of our business, focusing not only on our own activities but also on our supply chain and our business relationships.

We expect our suppliers to share the same commitment.

At a minimum, we expect suppliers to comply with all relevant legal and industry requirements for product safety, climate and environment, human rights, health and safety, anti-bribery and business ethics. All suppliers are expected to commit to the goals of the Paris Agreement and adhere to the key global standards for responsible business conduct: the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the ILO core conventions for labour rights.

Code of conduct for suppliers

This Code of Conduct is applicable to all suppliers and partners who supply products to our company.

A. Product safety and quality

We expect suppliers to comply with all laws and regulations on product safety and quality whilst delivering products to agreed product safety and quality standards. We expect suppliers to have in place quality assurance processes to identify any defects and implement corrective actions.

B. Climate and the environment

All entities in the supply chain have a responsibility to reduce their environmental footprint and work toward zero harm to the environment. We expect suppliers to conduct their business in a manner that actively manages environmental risks and impacts across their operations, products, and supply chain. We expect suppliers to comply with the requirements of applicable environmental legislation and commit to international goals for safeguarding the environment, including achieving net-zero carbon emissions and protecting air, waters, and land.

Suppliers are expected to have in place an appropriate environmental management system, including policies and procedures aimed at effectively managing their environmental risks and impacts. This includes measures to develop circular solutions, minimize the use of and waste from hazardous materials, reduce the use of plastic and minimize plastic waste, improve efficiency of energy, water, and natural resource usage, and reduce greenhouse gas and other harmful emissions.

We expect suppliers to require the same from their suppliers.

C. Human rights and decent work

Respect for human rights and international labour standards (ILO core conventions) for decent work are globally agreed minimum standards that apply to all businesses. We expect suppliers to adhere to

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the UNGP and meet their responsibility to respect human rights, which means preventing and addressing negative impacts on workers and other directly affected stakeholders resulting from their business operations. This includes preventing adverse environmental impacts that may harm the health and livelihood of surrounding communities; providing a living wage; protecting the health, safety, and welfare of workers; respecting freedom of association; prohibiting harassment, bullying and any form of discrimination at the workplace, including gender discrimination and sexual abuse; and prohibiting any form of forced labour, modern slavery, human trafficking, and child labour.

Suppliers are expected to identify risks and actual adverse human rights impacts related to their activities and business relationships. They should take appropriate steps to reduce risk and ensure their operations do not contribute to human rights abuses, and remedy any adverse impacts directly caused or contributed to, by their activities or business relationships. Suppliers should have in place a grievance mechanism for workers and affected communities to raise concerns about human rights risks and impacts. We expect suppliers to also request their own suppliers to carry out human rights due diligence in line with the UNGP.

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 annual account on our human rights due diligence. Also, as required by the Norwegian Transparency Act, we provide information about our human rights due diligence if requested by external parties.

D. Anti-bribery and anti-corruption

Suppliers must comply with anti-corruption laws, and we expect suppliers to conduct appropriate due diligence to prevent and address bribery and corruption in all business arrangements.

Suppliers must not offer or receive gifts that breach applicable laws, regulations, rules and standards. If offering gifts or hospitality, this must be done in an open and transparent way and must never be illegal. Where gifts or hospitality are offered, these should not be intended or interpreted as an attempt to improperly influence business decisions.

Meeting this code of conduct

We expect suppliers to make this Code of Conduct available to relevant employees. Suppliers are requested to document how they meet these standards, and we reserve the right to audit against compliance. If we identify breaches of the requirements in this Code of Conduct, we will engage in dialogue with the supplier and request documentation of corrective action plans. We reserve the right to terminate contracts in the event that serious breaches are not addressed or in the event of reoccurring breaches of this Code of Conduct.

We also expect that our suppliers disseminate these expectations in their own supply chain by requiring the same minimum standards from their own suppliers and requesting own suppliers to undertake responsible business due diligence.

In case of identified risks or concerns relating to this Code of Conduct, we expect suppliers to notify us immediately.

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