

[ALUMECO GROUP - SUPPLIER CODE OF CONDUCT]

Introduction:

This Supplier Code of Conduct outlines the basic requirements that apply to the Alumeco Group and all its companies.

The Alumeco Group requires that all purchased products have been manufactured according to environmentally and socially sustainable methods. This Code of Conduct is designed to support our process for identifying suppliers that exhibit a firm commitment to safety, ethics and the environment, and it outlines our expectations to all business partners, suppliers and sub-suppliers.

The supplier commits to respecting the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

All sub-suppliers, suppliers and business partners to the Alumeco Group must support the Ten Principles of the UN Global Compact and must, at all times, ensure:

Legal compliance:

- to comply with all relevant laws and regulations and ensure legal compliance through training, awareness, operational control and monitoring. We encourage all to go beyond legal compliance and continuously seek to improve social, ethical and environmental performance.

Anti-corruption:

- to never engage in any form of bribery, facilitation payment, corruption, extortion or embezzlement, or any illegal method to influence public officials, the judiciary or private parties.
- to have read and understood the Alumeco Group's Anti-Corruption Policy and to comply fully with its principles in the course of their work.

Conflict of Interest, Antitrust and Fair Competition:

- to seek to avoid any conflict of interest in relation to business with the Alumeco Group.
- to comply with all applicable competition and antitrust laws, including prohibitions on price fixing, bid rigging, market sharing, and other anti-competitive practices.

Sanctions and Export Controls:

- to comply with all applicable export control laws and regulations relating to military and dual-use goods, and with contractually relevant sanctions, or sanctions imposed by the EU, US, UK, or other relevant jurisdictions.
- to comply with anti-dumping regulations and international trade agreements, and to refrain from practices that circumvent such rules.

Human rights:

- to support and respect all internationally recognised human rights, including those set out in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.
- to treat all employees with respect and dignity. Any form of harassment, abuse, threats, or degrading treatment – whether physical, verbal, or psychological – is strictly prohibited.
- the equal treatment and non-discrimination on the basis of race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, union affiliation, sexual orientation, disability, age, health status, or any other protected characteristic. Employment decisions must be based solely on relevant and objective criteria.
- to prohibit all forms of child labour and ensure compliance with the minimum age of employment as defined in ILO conventions and national laws. No employee under 18 may perform hazardous work.
- to refrain from any complicity in human rights abuses and actively identify, prevent, and mitigate potential human rights risks – including through risk-based due diligence in their own supply chains covering labour conditions, environmental impacts, and ethical conduct.

Labour:

- to provide safe and healthy working conditions and protect employees from hazards and dangers in the workplace, in accordance with applicable laws. This includes the provision of adequate training, clear instructions, and appropriate personal protective equipment.
- to respect employees' freedom of association and their right to join or not join workers' organisations without fear of dismissal, discrimination, harassment or intimidation.

assessment or intimidation.

- to prohibit and refrain from any use of forced, bonded or indentured labour or human trafficking. Workers must be free to leave their workplace at the end of their shift and retain control of their personal documents.
- to comply with all applicable labour laws regarding wages, working hours, overtime, sick leave, and other elements of compensation.
- that all employees are entitled to at least one day off in every seven-day period.

Climate and environment:

- to comply with all applicable environmental and climate-related laws and regulations and to prevent adverse environmental impacts from their operations through proactive and responsible management
- to continuously attempt to improve environmental performance by monitoring results, reducing pollution, and systematically minimising waste, water usage, and energy consumption.
- to monitor and strive to reduce indirect (Scope 3) greenhouse gas emissions across their value chain.
- to comply with applicable chemical and product safety regulations, including the REACH Regulation (EC) No. 1907/2006 and the RoHS Directive 2011/65/EU, where relevant.
- to assess and, where relevant, mitigate adverse impacts on biodiversity, land use and deforestation, including by avoiding sourcing from areas of high conservation value.
- to work proactively with certified business partners and to consider implementing recognised environmental and energy management systems such as ISO 14001 and ISO 50001, where relevant.
- to strive to align climate-related efforts with the objectives of the Paris Agreement and to consider setting science-based emission reduction targets, for example through the Science-Based Targets initiative (SBTi), as part of a credible long-term approach to reducing greenhouse gas emissions.

Responsible Sourcing and Conflict Minerals:

- to avoid using minerals from conflict-affected and high-risk areas that directly or indirectly finance armed conflict or contribute to human rights abuses. Suppliers must be able to trace and document the origin of the four conflict minerals: tin, tantalum, tungsten, and gold.

Data security:

- to follow all legal requirements for data protection and protect privacy and rights regulated by the General Data Protection Regulation (GDPR).
- to implement appropriate cybersecurity measures to prevent unauthorized access, breaches, and data loss.
- to respect and protect intellectual property rights and confidential business information, including trade secrets.

Whistleblower and Duty to Report:

- to establish and maintain a confidential channel for employees and stakeholders to report concerns regarding unethical or illegal conduct without fear of retaliation.
- to notify the Alumeco Group without undue delay of any actual or potential breach of this Code of Conduct.

We reserve the right to audit the sub-supplier's, supplier's or business partner's compliance with the requirements stated above. We may request suppliers to complete self-assessment questionnaires and participate in on-site evaluations. Suppliers commit to providing timely, complete, and truthful responses to such requests. If a sub-supplier, supplier or business partner does not meet the requirements stated in this Code of Conduct, we are entitled to consider this non-compliance as a substantial breach of the obligations towards the Alumeco Group and/or direct said business partner to apply a counteractive action plan to remedy the non-compliance within a specified period. If non-compliance have not been remedied within this period, the Alumeco Group has the right to terminate the contract.

You, the business partner, hereby certify to have fully read and understood the Alumeco Group Supplier Code of Conduct.

Place and date

Name of company

Name of representative

Signature