

Responsible Sourcing and Supplier Compliance Policy

1. Overview

➤ Introduction

This Policy (“**Policy**”) sets forth basic principles for supplier conduct when working with AluK. AluK is committed to these principles and expects its suppliers to be as well.

AluK Group is committed to conducting all procurement activities in adherence with this Policy and any applicable regulatory requirements.

➤ Application

This Policy applies to procurement related activities across the AluK Group. Further, it includes (to the extent the AluK Group can enforce or influence application) joint ventures, partnerships, and other business entities in which the AluK Group has a participating interest.

➤ Evaluation

The supplier requirements as outlined in section 2 below are to be evaluated on a frequent basis. The results of the evaluation will be reviewed by AluK Group, and any significant performance gap to the AluK responsible sourcing requirements will be communicated to the supplier with the aim to improve through a corrective action plan defined by both parties.

2. Supplier Requirements

AluK Group expects its suppliers to adhere to the provisions outlined below. AluK Group also expects its suppliers to strive for continuous improvement.

➤ Environmental:

Suppliers will comply with applicable environmental laws and shall have systems in place to ensure safe management of waste, usage of chemicals air emission and wastewater discharges. Suppliers must seek to continuously minimize environmental impact, including but not limited to CO₂ impact, and make continuous improvements to resource efficiency, for instance by using recycled materials and participating to circular economy. Suppliers are strongly encouraged to adopt an eco-design approach, by using and giving priority to materials whose life cycle takes recycling into account, which contributes to preserving natural resources, fighting against climate change, and guaranteeing the healthiest possible products for end users.

Suppliers shall ensure traceability of raw materials, materials and products and be ready to disclose detailed product information to AluK Group regarding Life Cycle Assessment and Carbon Footprint.

Suppliers may commit inter alia with the following standards: (i) Certified ISO 14001 or EMAS; (ii) Reduction program (ESG or Sustainability requirements) – CO2 footprint; (iii) Recycling of raw material (aluminum) and EPD (environmental product declaration).

➤ **Health and Safety**

Suppliers must ensure a safe and healthy workplace for their employees, including appropriate controls, training, work procedures and personal protective equipment in order to strive to reduce work injuries and improve security at work. Suppliers will comply with all health and safety laws that are applicable to their workplace.

Suppliers shall ensure health and safety policies are enforced for their external stakeholders such as customers', suppliers' and subcontractors' employees and users of their products.

AluK reserves the right to carry out an audit during a site visit to ensure the information provided is correct.

➤ **Human Rights**

Suppliers must respect the Human Rights of their employees and treat them fairly and with respect, in accordance with applicable laws.

- No forced labour: Suppliers will not use forced or involuntary labour.
- No harassment: Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse and will comply with all applicable laws on harassment and abuse of employees.
- No child labour: Suppliers shall not employ children. Suppliers shall not recruit children for work or exploit them in any way. They must respect the national minimum age for admission to employment or the age of completion of compulsory schooling.
- No discrimination: Suppliers must promote equal opportunities on employment, remuneration, access to training, promotion, or retirement and ban any type of discrimination based on race, color, national origin, sex, religion, age, disability or any other personal characteristic unrelated to job performance and will comply with all applicable employment discrimination laws.
- Compliance with labor laws: Suppliers will comply with applicable laws in the countries where they operate, and the norms defined by the International Labour Organization on work hours and overtime, wages and benefits and freedom of association.

➤ **Social and Ethical**

AluK Group expects its suppliers to conduct their business ethically and in compliance with the law.

- Fair competition: Suppliers will be committed to lawful, straightforward, and ethical competition and must ensure that their business practices fully comply with the competition laws wherever they do business.
- Accurate business records: Suppliers will keep – and provide AluK Group upon request – accurate records of all matters related to the supplier's business with AluK Group.
- Protect information & data privacy: Suppliers will protect AluK Group confidential information and act to prevent its misuse, theft, fraud, or improper disclosure. Suppliers will comply with data protection laws wherever they do business.
- Avoid conflicts of interest: Suppliers will avoid any interaction with an AluK Group employee that may conflict, or appear to conflict, with the employee's ability to act in the best interests of AluK Group.
- No bribery: AluK is committed to conducting business with integrity, honesty, and transparency. AluK prohibits the offering, giving, solicitation, or acceptance of any form of bribe, kickback, or improper inducement, whether directly or indirectly, in connection with business activities. This includes bribes offered or received by employees, consultants, contractors, or any third parties acting on behalf of the company.
- Suppliers shall not influence nor seek to influence AluK Group employees by payments of money or any other thing of value, including corporate hospitality and gifts. We recognize that market practices across countries where AluK is doing business or getting supplies, may vary; however, gift acceptance or offering cannot result in a personal gain or advantage for the parties involved in the exchange nor influence any decisions related or unrelated to the business. AluK Group requires compliance with all applicable anti-bribery and corruption laws in the conduct of business. Compliance is required of any third party acting for or on our behalf, such as agents, distributors, contractors, consultants, etc.

AluK Group requires any company submitting formal tender responses via the AluK procurement team to disclose on request information related to implemented control mechanisms in the five aforementioned areas: Financial health, Environmental, Health and Safety, Human Rights and Social & Ethical.

3. Added-value creation

To achieve the goals outlined, it is imperative for the AluK Group to establish and maintain a close relationship and work jointly on programs and activities with its suppliers bringing and enhancing value creation in both AluK and Suppliers' communities.

4. Expectations in respect to the Responsible Sourcing Policy

AluK expects its suppliers to adhere to the provisions outlined above. AluK also expects its suppliers to strive for continuous improvement. Suppliers should also apply these or similar provisions to the subcontractors and suppliers they work with in providing goods and services to AluK Group.

AluK reserves the right to assess and monitor suppliers' compliance with this Policy, including requesting statements and official documents. Suppliers who are not in compliance with this Policy are expected to implement corrective actions or face the prospect of not being considered by AluK Group for future business. Non-adherence to this Policy may result in cancellation or non-renewal of contracts.

To monitor the different requirements of this policy, a supplier form will be sent to you so that you can fill it and provide us with more details about how your company operates.

5. Contact

For any questions relating to this Policy, please contact:

Julie Roger, Head of Purchasing and Procurement: Julie.roger@aluk.com

For and on behalf of.....

As official acknowledgement of the Responsible sourcing policy:

(Signature and Stamp)

Name:

Title: