

Supplier code of conduct

1	Introduction	
	Introduction	4
	International framework	6
	Management system	7
	Implementation and compliance	8
	Monitoring.....	9
2	Legal compliance	10
3	Health and safety	12
4	Human and labor rights	14
4.1	Human rights due diligence	15
4.2	Child labor	15
4.3	Modern slavery	16
4.4	Discrimination, harassment and harsh or inhumane treatment.....	17
4.5	Working hours and compensation	18
4.6	Freedom of association and collective bargaining.....	19
4.7	Land & Resources acquisition and use of property	20
5	Responsible sourcing of minerals and metals	22
6	Environment	24
7	Business ethics	26
7.1	Anti-corruption.....	27
7.2	Competition law.....	27
7.3	Personal data protection.....	28
7.4	Trade compliance.....	28
	Supplier accept	30

1. Introduction

Alleima puts ethical and sustainable practices first. We want to be a competitive, fair, respectful, and trusted partner to all current and future customers, colleagues, suppliers and other stakeholders. We care about the environment, the communities in which we operate, and the future that we share.

To guide us in this, Alleima has developed a Sustainability Policy, a Code of Conduct and a Supplier Code of Conduct (hereafter referred to as the “Supplier Code”). This includes identifying, preventing, mitigating, and accounting for negative environmental, human rights and governance impacts in our own operations and through-out our supply chain.

Our Supplier Code applies to all our suppliers and service providers, hereafter referred to as (“suppliers”). We expect our suppliers to comply with the Supplier Code, and collaborate with us in order to contribute to the Sustainability Targets of Alleima:

- **Climate & Circularity**
- **Market Leadership**
- **Responsible Employer**
- **Ethical Business Conduct**

Fueled by our desire to care, deliver and evolve, we push products and processes to be more sustainable and more efficient.

Together with our customers,
together with our suppliers,
for our shared future
- we are advancing together.



International framework

We support the UN International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption as outlined in the ten principles of the United Nations Global Compact, in which we participate.

We are committed to adhering to these principles as well as the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights and expect the same from our suppliers.

Management system

We encourage our suppliers to strive towards continual improvement, and to establish, implement and maintain recognized management systems and standards related to the areas described in the Supplier Code. Risk assessment, implemented policies, processes and routines, clearly communicated roles and responsibilities, relevant training and instructions, establishment and evaluation of measurable goals, along with functioning control systems, serve as the foundation for the successful implementation of the Supplier Code.

Employees must have the right to report concerns regarding compliance with legal requirements or company policies/rules to their employer without fear of reprisal.

Implementation and compliance

When evaluating a supplier's compliance with the Supplier Code, Alleima will take into consideration the scope and applicability of the requirements in relation to the nature of the supplier's business and the associated risks.

Additional supplier-specific sustainability requirements and targets may be defined in commercial agreements.

Failure by the supplier to allow Alleima the right to verify compliance with the Supplier Code, or to remedy identified non-compliances within a reasonable time shall be regarded as a material breach of The Supplier Code. As a result, Alleima is entitled to terminate the contractual relationship with the Supplier.

Each section in the Supplier Code is structured as follows:

Requirements

It is the responsibility of the supplier to meet the requirements outlined in the Supplier Code, in their own organization and in their supply chain.

Guide

Examples for suppliers of how to meet the requirements.

How we will verify compliance

Examples of evidence of compliance with the requirements, however, other verification evidence may also be considered.



Monitoring

All business relations between Alleima and our suppliers must be based on honesty, trust, and cooperation. By accepting the Supplier Code, the supplier commits to meeting these requirements within its own operations and supply chain. This should be achieved by cooperating in a transparent manner with Alleima, and suppliers must be able to demonstrate their compliance with the requirements upon request. Alleima may verify the supplier's compliance with the requirements in the Supplier Code by means of a dialogue, self-assessment questionnaire, or on-site audits. This includes permission to conduct interviews with employees and access to accurate and complete documentation and records related to the Supplier Code. Any audits or checks that Alleima conducts at the supplier's sub-supplier will be conducted upon agreement with the supplier. Compliance verifications are conducted either by the employees of Alleima or by an independent third party appointed by Alleima.

It is the responsibility of the supplier to ensure that its suppliers comply with the requirements of the Supplier Code or equivalent set of requirements, and to evaluate and monitor its supply chain compliance.

You may come across a situation that does not appear to conform with the Supplier Code or the law. In such an instance, we expect you to bring this to our attention as soon as possible so that we can mitigate it and continue to be an ethical and sustainable company. Violations of the Supplier Code are to be reported to Alleima either through a Alleima contact person or through our Speak Up system, available at alleima.com.

Alleima treats all business and personal information received in a responsible manner and take measures to ensure that this information remains confidential.

2. Legal compliance

Ensuring awareness of, and compliance with, relevant legal requirements is the baseline for complying with the Supplier Code.

Requirements

Suppliers must stay up to date, and comply with, national and regional legislation as well as relevant and applicable international regulations and conventions related to the areas in the Supplier Code.

Suppliers must be aware of whether any domestic regulation or its enforcement conflicts with international human rights standards and strive to honor the spirit of universally recognized human rights.

Where the requirements in the Supplier Code are stricter than local laws, the requirements of the Supplier Code must be applied. In the event of actual or potential contradictions between the Code and applicable laws and regulations, suppliers must notify Alleima.

How we will verify compliance

We will ask you how you work to ensure legal compliance with the following areas:

- Health and safety
- Human rights
- Labor rights
- Working conditions
- Environment
- Tax
- Anti-corruption practices
- Customs and export control
- Data privacy
- Responsible sourcing of metals and minerals

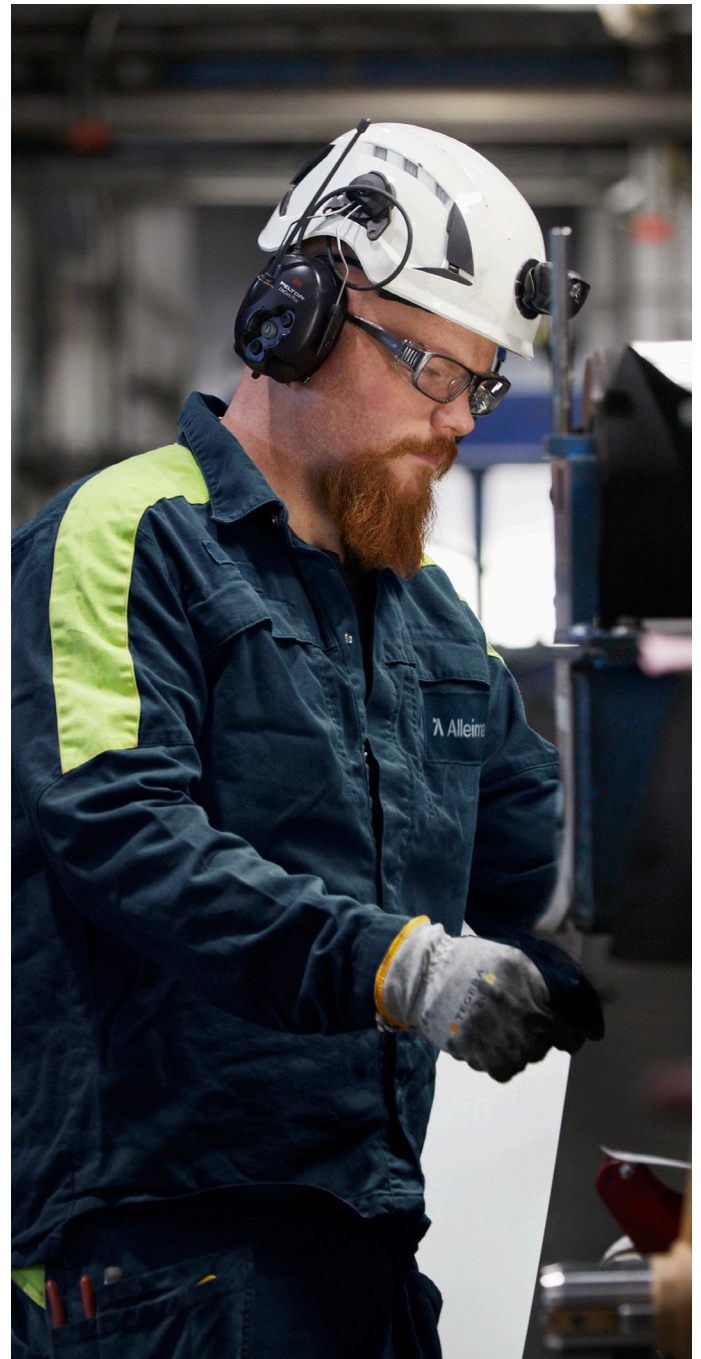
Guide

Be aware of and implement existing legal requirements relevant to the business and stay updated on any relevant changes.

Obtain all legally required permits, licenses and registrations and make sure that they remain valid.

3. Health and safety

Zero Harm to people is a fundamental operating principle at Alleima.



Requirements

Suppliers must provide a safe and healthy working environment and take all feasible steps to prevent incidents and injuries.

Suppliers must have an adequate, risk-based health and safety approach, including, for example, providing relevant instructions and training that is understandable to all employees.

Employees must have the right to refuse a work situation if they reasonably believe that it presents an imminent and serious risk to their health and safety.

All work premises, including in applicable cases accommodation and canteens, must be regularly checked to maintain fire safety and hygiene standards on an everyday basis.

If accommodation is provided, each employee must have the right to their own bed and to a separate sleeping area for the gender to which they identify.

How we will verify compliance

Checkpoints may include:

- Buildings are used for their intended purpose, verified by operating permits.
- Electrical wiring, lighting and gas fixtures are properly installed and maintained.
- Functioning fire alarms, adequate firefighting equipment, clearly marked and accessible evacuation routes, and emergency exits are maintained based on the size of the facility.
- Fire and evacuation drills are carried out regularly.
- Emergency plans and response procedures are implemented.
- Adequate control measures are in place to mitigate health and safety hazards.
- Procedures and systems to manage, track and report occupational injury and illness are implemented.
- Personal protective equipment and protective clothing that are clean, free of charge, in working order and appropriate for the risks identified are used by the employees.
- Relevant first aid kits are easily accessible, and employees are trained in first aid.
- Employees do not work under the influence of drugs or alcohol.
- The work premises are clean, well lit, adequately ventilated and kept at acceptable temperatures and noise levels.
- Free access to clean drinking water, clean areas to eat meals, hygienic toilets and, where applicable, showers are provided.

Guide

Perform regular health and safety risk assessments of the business, as well as evaluating the efficiency of preventive and mitigating actions.

4. Human and labor rights

Respecting human and labor rights is of great importance to Alleima. This includes treating employees fairly, with dignity and respect, and avoiding causing or contributing to abuse of human and labor rights.

4.1 Human rights due diligence

Requirements

Suppliers must be aware of and address any human rights impacts that they cause or contribute to or that are directly linked to their operations, products, or services.

How we will verify compliance

Checkpoints may include:

- Review the results of the human rights due diligence conducted.

4.2 Child labor

Requirements

Child labor is unacceptable to Alleima. Suppliers must work to prevent child labor in their operation and supply chain and ensure legal working conditions for young workers.

If child labor is identified, a remediation in the best interest of the child must be carried out.

Employees must not be younger than 15 years of age (or 14 if allowed by national law), or older where local law stipulates a higher minimum age.

Young workers (below 18 years old) must not perform work that is mentally, physically, socially, or morally hazardous or that interferes with their mandatory schooling. Young workers must not work night shifts.

How we will verify compliance

Checkpoints may include:

- All work is performed by employees who have attained the legal working age.
- There is a system to certify that no underage workers are employed.
- Young workers are provided with legal working conditions.

Guide

Work proactively with human rights for example by performing human rights due diligence to identify, prevent, mitigate, and account for the business impact on human rights.

Guide

Maintain records of legal working age for all employees, for example, copies of age verification documentation.

4.3 Modern slavery

Modern slavery, including forced, bonded or compulsory labor, servitude, deceptive recruiting, descent-based slavery and human trafficking is unacceptable to Alleima. This refers not only to all work performed involuntarily, but also to instances of coercion, mental and/or physical threat or abuse, abuse of power and deception.

Requirements

Suppliers, including their recruitment agencies, must not engage in or tolerate:

- Restrictions of movement
- Excessive recruitment fees or cash deposits
- Confiscation of identity documents and/or passports
- Withholding of wages
- Abusive working conditions
- Debt bondage
- Violence

or any form of forced, compulsory or illegal labor, including trafficking, prison labor, child slavery or bonded labor or any other kind of exploitation or abuse.

How we will verify compliance

Checkpoints may include:

- Overtime work is consensual, unless necessary and mandated according to local laws.
- Employees have the right to leave their accommodation and workplace freely during their leisure time.
- Employees are not required to surrender original personal certificates or identification documents such as government-issued identification, passports, or work permits as a condition of employment.
- No use of unlawful disciplinary practices or financial penalties such as unfair or illegal deductions from wages, withholding of wages or discontinuing benefits as a disciplinary measure.
- There are no deposits, fees, fines, loans, or repayment agreements preventing employees from leaving their employment upon providing reasonable notice.
- Repayment agreements are foreseeable, reasonable, and limited in time.
- Migrant workers are treated fairly and on an equal basis with local employees.

Guide

Be aware of risks of modern slavery in the industry and implement policies and preventive measures with a zero-tolerance approach to involvement in modern slavery.

Avoid business practices or decisions likely to put excessive pressure on suppliers, contractors and subcontractors and lead to modern slavery.

4.4 Discrimination, harassment and harsh or inhumane treatment

Workplace discrimination is unacceptable to Alleima. Inclusive and diverse teams contribute to enhanced performance and results for the company.

Requirements

Suppliers must respect the personal dignity, privacy and rights of each employee, and must not tolerate any physical or mental harassment or abuse, expressed verbally or nonverbally.

Suppliers must prohibit behavior, language, and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

Suppliers must not discriminate unfairly in hiring or during the employment lifecycle, whether active or by means of passive support on the grounds of age, nationality or ethnicity, religion, political beliefs, sexual orientation, gender identity or expression, physical ability or any other characteristic protected by law or ILO Conventions.

Suppliers must prohibit public warnings and punishment systems.

How we will verify compliance

Checkpoints may include:

- Practices for recruitment, remuneration, employment, non-discrimination and equal opportunities are implemented and communicated.
- Mechanisms in place to report, investigate and sanction discriminatory or harassing behaviors without reprisal or retaliation.

Guide

Foster a discrimination free work culture.

Strive to develop diverse teams and a workplace where people feel included, and safe to contribute and challenge.

4.5 Working hours and compensation

Reasonable working hours and fair remuneration are central in providing decent working conditions. Sufficient rest and time off from work prevent workplace injuries and increase efficiency.

Requirements

Working hours, overtime, breaks and leaves must comply with relevant legal requirements, or with applicable collective agreements.

Excessive overtime must not be the norm.

At a minimum, employees must be offered compensation and benefits in accordance with relevant legal requirements, or with applicable collective agreements.

Employees must be informed of their employment conditions, including their rights and obligations, in their native language or a language they understand, for example, in a written labor contract.

Suppliers are encouraged to provide family-friendly working conditions that provide a healthy work-life balance, including if applicable the possibilities for caring responsibilities and recreation.

How we will verify compliance

Checkpoints may include:

- Actual working hours are recorded, divided into normal working hours and overtime hours, unless otherwise agreed.
- Employees are entitled to at least one day off per week and to sufficient rest between shifts.
- Wages are paid regularly, directly to the employee, at the agreed time, and in full for the time worked during the applicable period.
- Review of signed labor contracts and pay slips.
- Employees take paid statutory holidays and legally stipulated leaves, including paid sick leave and parental leave, without any negative consequences.

Guide

Keep legal working hours and accurate verification thereof.

Maintain accurate records of all wages.

Provide all employees with a pay slip clearly stating all parts of their salary in a comprehensible manner, including overtime compensation, hours worked, benefits, legal deductions, bonuses and other relevant posts.

Inform employees of their employment conditions and keep records thereof, for example, copies of signed labor contracts.

4.6 Freedom of association and collective bargaining

Alleima supports freedom of association and the right to lawfully and peacefully associate, organize and bargain collectively. We encourage suppliers to engage in dialogue with their employees to motivate and stimulate workplace engagement.

Requirements

Suppliers must recognize and respect the right of employees to freely associate, organize and bargain collectively in accordance with the laws of the countries in which they are employed.

Suppliers must recognize the importance of open communication and direct engagement between employees and management.

Suppliers must allow employees to appoint independent work representatives and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

Conversely, those employees who choose not to participate in workers' associations must be respected for their choice.

How we will verify compliance

Checkpoints may include:

- Employees have the right to organize and bargain collectively.
- Employees have the right to appoint independent work representatives and communicate with management.
- Workers' representatives are recognized by management.
- Review of collective agreements in applicable cases.
- Evidence of functioning dialogue mechanisms between workers and management.

Guide

Foster a working environment, that allows for mutually constructive engagement, between employees and management, avoiding unnecessary confrontation whenever possible.

Engage in dialogue with employees on working conditions and keep records of meetings or communications carried out.

4.7 Land & resource acquisition and use of property

Land and the right to tenure is central to ending poverty, income, gender inequality, and for contributing to food security, peace and security.

Requirements

Suppliers must be the legal and rightful owner or user of the property on which they operate.

Suppliers must avoid any negative social, health, environmental or economic impacts from land or resource acquisition, involuntary resettlement, or restrictions on land use.

In the event of expropriation or imposed relocation, suppliers must ensure that a remediation plan is negotiated in a transparent manner, including but not limited to adequate compensation, with the goal to maintain the livelihoods and standards of living of the persons concerned.

How we will verify compliance

Checkpoints may include:

- Review of land ownership or lease.
- Review of impact assessment and/or contingency plans in applicable cases.
- Review of remediation plans adopted in consultation with affected stakeholders in applicable cases.

Guide

Maintain evidence of land ownership or the lease for the property on which you operate.

Evaluate potential impacts on the previous users or other stakeholders caused by the shift of lease or ownership of the property on which you operate, as well as impacts resulting from the company's ongoing operations. Pay special attention to the most vulnerable categories (rural communities, indigenous people, women and children).

In case where people had to move or give up land to give space for the business, engage in open and transparent dialogues to find the most appropriate remediation in the best interests of the relocated people.



5. Responsible sourcing of minerals and metals

Alleima supports ethical sourcing of all minerals. Supply chains that either directly or indirectly contribute to conflicts or to serious human rights violations are unacceptable to Alleima. Since arbitrary disengagement from conflict areas may cause negative consequences to the local population, Alleima encourages ethical sourcing of minerals from these areas.

Requirements

Suppliers of raw materials and components containing tin, tantalum, tungsten, gold (3TG) or cobalt that are part of the direct supply chain of Alleima products:

- Must comply with all applicable laws concerning responsible sourcing and conflict minerals.
- Must follow the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas based on their position in the supply chain, including relevant reporting.
- Must ensure that all supplies in their 3TG and cobalt supply chain are traceable to smelter or refiner level.

3TG smelters and refineries in our supply chain must be assessed as compliant with accepted third-party audit programs such as the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative.

Cobalt smelters and refineries must aim to be assessed as compliant or must, at minimum, take part and actively engage in third-party audit programs.

While respecting commercial confidentiality, suppliers must, upon request, report on their 3TG and cobalt supply chain by completing and submitting the Responsible Minerals Initiative's Conflict Minerals Reporting Template (CMRT) and/or Cobalt Reporting Template (CRT).

How we will verify compliance

Checkpoints may include:

- Perform due diligence in accordance with the OECD Due Diligence Guidance, in which we expect you to cooperate.
- Review the results of Reasonable Country of Origin Inquiries.
- Review your reports on responsible sourcing of minerals and metals.
- Smelters and refineries in our supply chain listed as compliant on the EU Commission's list of responsible smelters, the Responsible Minerals Assurance Process (RMAP)-conformant smelter lists or, where applicable, approved by other equivalent industry schemes.

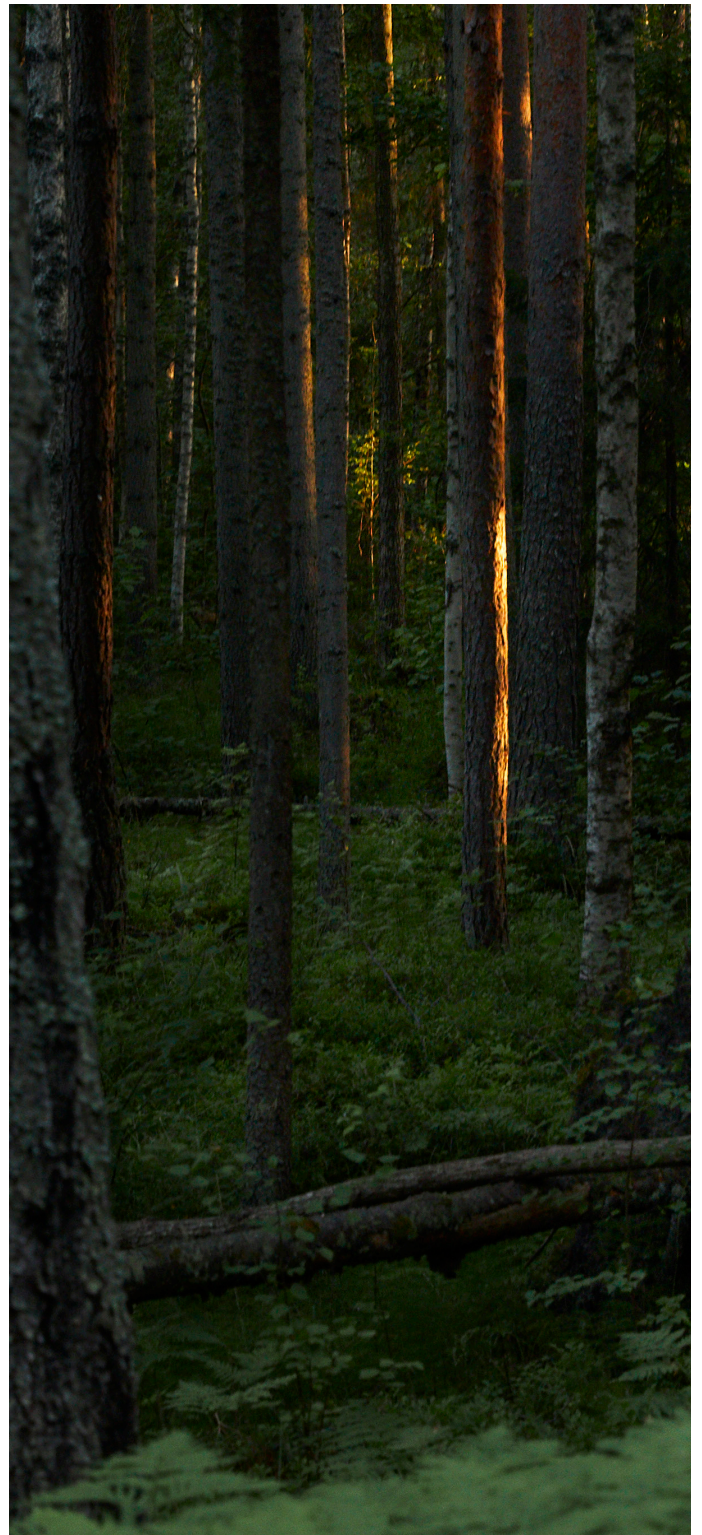
Guide

Be conscious of the potential link between the production of raw materials and armed conflicts or severe violations of human rights.

Depending on your position in the supply chain, source raw materials from responsible sources only, or undertake reasonable measures to understand, and when necessary, influence your supply chains towards responsible sourcing.

6. Environment

Protecting the environment, mitigating climate change, and building circularity is of great importance to Alleima. The environmental impact from the business must be minimized, and performance with respect to the environment must be improved continuously. This includes the protection of biodiversity and ecosystems, sustainable use of resources as well as responsible land ownership, acquisition and use.



Requirements

Suppliers must establish, implement and maintain a risk-based approach to reduce or minimize any negative environmental impact from their activities, products and services.

Suppliers must take precautionary measures as soon as there is reason to believe that an action could harm the environment or public health and strive to develop and support environmentally friendly techniques in their products, processes, designs and material selection.

Suppliers must pay the social, environmental and economic costs that arise should their business cause damage to the environment.

Suppliers must control, measure, document and plan their work to minimize the environmental impact of their business in particularly the following areas:

- Greenhouse gas (GHG) emissions
- Circularity
- Chemicals and hazardous substances
- Waste
- Other emissions to air, water and soil
- Energy consumption
- Water consumption

Alleima encourages suppliers to set GHG emission reduction targets in line with the Paris Agreement, supported by Science Based Targets. Suppliers with a potential material impact on our total GHG emissions must provide applicable information to Alleima.

How we will verify compliance

Checkpoints may include:

- Evidence of progress measurements and efforts to minimize the negative impact of the business on the environment.
- Review information about the presence of hazardous chemicals and substances of very high concern in the supplier's products.

Guide

Perform regular environmental risk assessments of the business value chain, as well as evaluating the efficiency of preventive and mitigating actions.

Participate in the transition from a linear to a circular system and work towards conserving finite resources.

Secure end-of-life handling and treatment of products by declaring full material content and information about handling and treatment of products at the end of life.

Select materials and resources that can be reused and recycled.

Minimize waste to landfill, especially hazardous waste.

Include environmental aspects in product development with a life cycle perspective from raw materials to end of life.

Actively work to replace hazardous chemicals with safer alternatives.

Actively work towards optimizing energy and resource efficiency.

Increase the share of low-emission energy sources.

Demonstrate and advocate environmental responsibility by supporting global initiatives. Publicly communicate targets and performance related to global environmental issues, especially climate and resource efficiency/circularity.

7. Business ethics

Alleima is committed to conducting business with high ethical integrity, including respecting competition law, guarding individuals' right to privacy and following all customs and export control rules. We expect the same from our suppliers.

7.1 Anti-corruption

Requirements

Suppliers must comply with local laws and international anti-corruption conventions and not engage in, or cause Alleima to engage in, any form of corrupt practices.

Suppliers must not offer anything of value to improperly influence Alleima employees or any third parties, such as subcontractors or public officials.

Suppliers must avoid all potential conflicts of interest while engaged with Alleima and notify Alleima of any potential conflicts of interest that cannot be avoided.

Suppliers must engage in our supplier due diligence process, with a commitment to transparency, quality and speed.

How we will verify compliance

Checkpoints may include:

- Review policies and related communication records, training records, gift and entertainment records, and conflicts of interest declarations.

7.2 Competition law

Requirements

Suppliers must always negotiate agreements, regardless of the contract form, in accordance with fair competition principles and observe the highest level of diligence.

Suppliers must not conclude any formal or informal contracts or agreements that are intended to prevent or restrict competition, or result in the prevention or restriction of competition, or contracts or agreements that breach applicable laws relating to competition or fair trade.

How we will verify compliance

Checkpoints may include:

- Documentation that fair competition policy and principles is implemented, and that training of relevant staff has been conducted.

Guide

Establish processes to prevent corruption, for example, by implementing an anti-corruption policy and by providing relevant training to your staff.

Guide

Competition law policy communicated to relevant employees.

Maintain record of employees trained in competition law.

7.3 Personal data protection

Requirements

Suppliers must follow all applicable principles for personal data protection and use personal data only when lawful and necessary to fulfill legitimate business purposes.

How we will verify compliance

Checkpoints may include:

- Review of relevant documentation showing that your organization has adopted these data privacy principles.

Guide

Data privacy principles:

- Inform individuals as much as possible about when and why you use their data.
- Use only the types of personal data absolutely necessary to accomplish your lawful and reasonable purposes.
- Store personal data only as long as necessary to fulfill such purposes, and as long as legally required.
- Protect personal data in your care by taking appropriate technical and organizational security measures and notify the relevant authorities of any personal data breaches, if legally required.

7.4 Trade compliance

Requirements

Suppliers must maintain and share accurate trade data and documents related to their products.

Suppliers must comply with local laws and international sanctions regulations and not engage in or cause Alleima to engage in any form of sanction breaches.

How we will verify compliance

Checkpoints may include:

- Review suppliers' trade compliance procedures.
- Require the submission of information and documentation to conduct legitimate trade.
- Require necessary evidence to ensure the validity of the trade data and other information provided.

Guide

Implement trade compliance procedures and provide relevant training to your staff.

Maintain and submit relevant and valid information and documentation about your products, such as: HS tariff codes, export control classification status, country of origin and supporting documentation for both non-preferential and preferential origin for free-trade purposes, and the US content in your products. Keep necessary records and evidence.

World class capabilities

Strong global production footprint and R&D.

- Global presence and close to customer
- Creating flexibility and back-up
- Enabling specialization

Main site in Sandviken, Sweden

- Melt shop and hot rolling
- Hot extrusion (three extrusion presses)
- Tube mills
- Rock drill steels
- Precision Strip and Surface Technology
- R&D

Global R&D capabilities

- 280 employees in R&D
- 40 PhDs, 6 senior experts
- 3 Research Centers in Sweden and India
- Close cooperation with leading technical universities

Global footprint



Supplier accept

I/We the undersigned authorized representative/s of the supplier, hereby certify that the Supplier accepts and complies with the Supplier Code.

Full company name: _____

Corporate identify number: _____

Place: _____

Date: _____

Name: _____

Position: _____

Signature: _____

Name: _____

Position: _____

Signature: _____

Company seal:



Forged from the past.
Engineered for the future.

Advancing together.
alleima.com