

The guidelines of Aluminium Norf GmbH on Corporate Social Responsibility (supplier declaration CSR) and compliance with the Supply Chain Due Diligence Act (LKSG) aim to continuously improve the social responsibility of suppliers and to maintain a healthy environment worth living in. Aluminium Norf expects that its suppliers will comply to the principles set out in this document and actively promote such principles in their own supply chain.

The requirements in this Supplier Code of Conduct are based on internationally recognized laws and principles and are also reflecting the core values of Aluminium Norf and the Code of Conduct for our own activities.

This Supplier Code of Conduct covers Alunorf's entire supply chain, including suppliers, vendors, contractors, traders, consultants, and agents (hereafter Supplier).

The requirements set out in this Supplier Code of Conduct reflect Alunorf's core values – Trust, Drive, Share, and our internal Code of Conduct. Alunorf's Suppliers and business partners are encouraged to review the internationally recognized principles indicated above and to integrate the requirements and guidelines into their individual operations and value chains.

Supplier shall always as a minimum comply with all applicable laws and regulations.

1. BUSINESS PRACTICES

Corruption, bribery and improper business conduct

Supplier shall not engage or be complicit in, or encourage any activity, practice or conduct that would be an offence under, or breach of, any applicable laws relating to corruption and bribery.

Supplier shall not, in order to obtain or retain business or other advantage in the conduct of business, offer, promise or give anything of value or an undue advantage to a public official or to any third party to influence such person to act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or indirectly.

Supplier shall not initiate or encourage facilitation payments on behalf of Alunorf, whether the payment is made directly or indirectly.

Supplier shall not request, accept or receive anything of value or an undue advantage that may influence their decisions, nor take part in or seek to influence any decision where there are related circumstances, factors or relationships (business, personal, economic or otherwise) that could give rise to an actual or perceived conflict of interest.

Supplier shall not offer, promise, give, request or accept gifts, favors or hospitality which are more than modest, both with respect to value and frequency, or are inappropriate with respect to time and place.

Supplier shall not offer, give, request or accept any gifts, favors or hospitality in connection with tender or negotiation/award processes.

Free competition & antitrust

Supplier shall not enter into, seek to enter into or otherwise engage in any form of agreement, arrangement or activity that would be a breach of applicable competition laws and regulations.

Tax, customs and export control regulations

Supplier shall comply with all applicable tax, customs and export control laws and regulations and shall ensure that all exports and imports comply with the applicable regulations

Money laundering

Supplier shall be firmly opposed to all forms of money laundering and shall take steps to prevent its financial transactions from being used by others to launder money or finance terror.

Trade sanctions

Supplier shall comply with trade sanctions relevant for the engagement with Alunorf.

Data Privacy and data security

Supplier shall comply with applicable data protection and data security laws and regulations. Supplier shall ensure that appropriate safeguards are in place so that sensitive data is fully protected.

Intellectual property

Supplier shall not use or offer any counterfeit or copied products. Supplier shall ensure that all its products and services do not violate intellectual property of third parties.

Training

Supplier shall train its managers and relevant employees on a regular basis on the content of this Supplier Code of Conduct, applicable laws, regulations and standards.

Compliance Management System

Supplier warrants it has established an appropriate Compliance Management System that supports compliance with applicable laws, rules and standards.

Risk Management

The partner must inform Aluminium Norf GmbH without being asked about identified risks, potential non-compliance cases and mitigating measures with regard to its direct and indirect suppliers and provide documentation of its due diligence measures on request.

Cybersecurity

The Supplier shall ensure that appropriate safeguards are in place so that sensitive data is fully protected.

2. HUMAN RIGHTS AND WORKING CONDITIONS

Human rights

Supplier shall respect and support individual and collective human rights affected by its operations. Supplier shall take appropriate action to assess, prevent and remedy potential adverse impacts on human rights in a manner that is consistent with international instruments on human rights.

Working Hours

Suppliers shall comply with applicable laws, regulations and national industry standards on working time, including overtime working hours, public holidays and paid vacation.

Child labor

Supplier shall not employ children below the age of 15 or any higher minimum age for employment according to applicable laws. Young workers below the age of 18 shall not undertake any hazardous work.

If any child is found working at the premises of the Supplier and it is not according to the exceptions in

the ILO convention on child labor (No. 138), steps shall immediately be taken to remedy the situation in accordance with the best interests of the child.

Forced labor

Supplier shall ensure that neither forced labor exists or other forms of modern slavery in the sense of servitude and work performed under force or human trafficking are tolerated (ILO 29). Supplier shall not employ personnel against their will or require personnel to lodge identity papers or deposits (financial incl. recruitment fee or otherwise) as a condition of their employment. All personnel shall be free to leave their employment after giving reasonable notice.

Freedom of association and right to collective bargaining

Supplier's personnel shall have the right to freedom of peaceful assembly and association, and no one may be compelled to belong to an association. Supplier shall respect the personnel's right to participate in unions and being represented in collective bargaining agreements in line with applicable laws and ILO Conventions. In countries where applicable law restricts these rights, alternative means of association for personnel shall be supported.

Employment conditions

Supplier shall ensure that their personnel are provided with a written description of terms and conditions of employment in a language they understand.

Wages and benefits paid for a standard working week shall as a minimum meet national legal or industry standards, whichever is higher. Wages should be enough to cover basic needs and provide some discretionary income.

Payments are to be made timely, in legal tender and fully documented.

Non-discrimination and equal opportunities

Supplier shall not support any form of discrimination or harassment including, but not limited to race, color, gender, sexual orientation, language, religion, political or other opinion, national or social origin. Supplier shall promote equality of opportunity or treatment in employment and occupation.

All personnel shall be treated with respect and dignity, and the Supplier shall refuse to tolerate any unacceptable or degrading treatment, including mental cruelty, sexual harassment or discrimination gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative.

Diverse and inclusive culture

Supplier shall take care of diverse and inclusive work culture including a workforce with a rich variety of, for example, backgrounds, skills, races, nationalities, genders and culture. All people must be respected for their individual abilities and views. Supplier shall not tolerate any form of harassment or discrimination including but not limited to harassment or discrimination based on gender, race, color, religion, political views, union affiliation, ethnic background, disability, sexual orientation, veteran status or marital status.

Local communities

Where relevant for the Supplier's operations, the rights and integrity of local communities, indigenous people or other traditional groups shall always be respected.

Supplier shall respect rights such as culture, customs and heritage of local communities.

Supplier shall minimize resettlement of people by considering feasible project alternatives.

For work that may have significant impact on land areas inhabited or used by indigenous people or other traditional groups, Supplier shall consult and cooperate with the people concerned in line with ILO convention 169.

Security forces

Supplier shall operate in line with the Voluntary Principles on Security and Human Rights when involved with public or private security providers.

Conflict minerals

To the extent applicable to Supplier's operations, there shall be a written policy and procedure in place to avoid knowingly acquiring conflict minerals or unsustainable mined minerals produced at high environmental and social costs.

Whistleblowing routine

Supplier shall ensure routines for personnel to raise concerns or request information related to their business operations.

3. HEALTH AND SAFETY

Supplier shall secure a healthy and safe working environment for all its personnel and follow prevailing regulatory standards and industry norms to minimize health and safety risks. This shall include compliance to applicable laws and regulations, international standards and the ILO Conventions on Occupational Health and Safety.

Supplier shall ensure that its personnel understand the hazards and safe practices for their work, and authority to refuse or stop unsafe work. Whenever

necessary personnel are to be provided with, and instructed to use, appropriate personal protective equipment.

Supplier shall provide adequate and regular training to ensure that personnel are adequately educated on health and safety issues.

Where Supplier provides accommodation for their personnel or sub-suppliers' personnel, it shall be clean, safe and meet the basic needs of the personnel, and, where appropriate, for their families

4. ENVIRONMENT AND CLIMATE

Supplier shall ensure that its operations are compliant with the environmental laws, regulations, legal agreements and permits relevant to the geographic locations of its facilities.

Supplier shall strive to minimize the adverse environmental and climate impacts of its activities, products and services. To the extent applicable to Supplier's operations, supplier shall demonstrate an established methodology for identifying and mitigating its material environmental risks.

Supplier shall seek to implement environmentally friendly technologies and processes in their activities to ensure the sustainable use of natural resources, safe handling of waste and chemicals, and reduced emissions to air and water.

Decarbonization

Supplier shall clearly illustrate a commitment to decarbonize their operations (Scope 1 & 2 GHG Emissions) through potential measures such as efficiency & technological improvements and the use of renewable energy

Emissions

Supplier shall minimize sources of emissions resulting from local operations such as noise, air and water, through the use of Best Available Technologies (BAT).

Biodiversity, Land Use & Remediation

Supplier shall work to reduce the impact of their operations to protect local biodiversity, and where applicable reduce deforestation, land use and any associated eviction of inhabitants. In the case of soil or ground water contamination, suppliers are expected to work with local officials and communities to remediate the effects.

Hazardous Substances

Supplier shall responsibly manage hazardous substances and where possible, substitute such substances with an environmentally friendly alternative.

5. INFORMATION ON MISCONDUCT

Supplier shall contact the whistleblowing system Alunorf – SpeakUp - if supplier has any concerns about illegal or improper conduct with respect to the topics named in the Supplier Code of Conduct. The whistleblowing system Alunorf SpeakUp can be found on the Alunorf homepage.

By signing this Supplier Declaration the supplier declares to comply with the above-mentioned principles and agrees to make respective documentation available on request.

Supplier name: _____

Address: _____

Date: _____

Name: _____

Title: _____

Signature: _____