

## Code of Conduct for Suppliers and Third Party Intermediaries

This Code of Conduct defines the basic requirements placed on suppliers of goods and services concerning their responsibilities towards their stakeholders and the environment (Corporate Social Responsibility). Looking to the future and thinking of well-being of children in the next generation, we hope to contribute to the development of society through our passion for engineering and manufacturing.

In the hope that our suppliers share our goal and will join us in committing to Corporate Social Responsibility (CSR), the supplier declares herewith:

- **Legal compliance**
  - to comply with the laws and social norms of the applicable legal system(s).
  
- **Non-disclosure**
  - to manage confidential information, technical information, and personal information without unfair nor improper acquisition, usage nor disclosure, through establishing and using a system;
  - to respect and not to infringe intellectual property rights of others.
  
- **Prohibition of corruption and bribery**
  - to maintain free and fair competition, without limitation or obstruction. Moreover, to prevent unfair activities, and to detect and to deal with them as early as possible;
  - to tolerate no form of and not to engage in any form of corruption or bribery, including any payment or other form of benefit conferred on any government official for the purpose of influencing decision making in violation of law;
  - to share and disclose information proactively and to ensure accountability to society and corporate transparency;
  - to neither demand nor provide benefits, gifts, or services.
  
- **Respect for the basic human rights of employees**
  - to promote equal opportunities for and treatment of its employees irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex or age;
  - to respect the personal dignity, privacy and rights of each individual;
  - to refuse to employ or make anyone work against his will;
  - to refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
  - to prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
  - to provide fair remuneration and to guarantee the applicable national statutory minimum wage; to comply with the maximum number of working hours laid down in the applicable laws;
  - to recognize, as far as legally possible, the right of free association of employees and to neither favor nor discriminate against members of employee organizations or trade unions.
  - to maintain a safe and comfortable working environment.

- **Prohibition of child labor**
  - to employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.
  
- **Health and safety of employees**
  - to take responsibility for the health and safety of its employees;
  - to control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases;
  - to provide training and ensure that employees are educated in health and safety issues;
  - to set up or use a reasonable occupational health & safety management system.
  
- **Environmental protection**
  - to act in accordance with the applicable statutory and international standards regarding environmental protection;
  - to minimize environmental pollution (including emission of 'greenhouse gasses', and drainage of waste) and make continuous improvements in environmental protection;
  - to use resources and energy effectively and economically;
  - to set up or use a reasonable environmental management system.
  
- **Prohibition on slavery, human trafficking and conflict minerals**
  - to ensure that there is no modern slavery or human trafficking in the supply chains or in any part of its supplier's business;
  - to have in place an appropriate anti-slavery policy which similarly reflects the commitment to acting ethically and with integrity in all business relationships.
  - to ensure that no conflict minerals, including, but not limited to, cassiterite, wolframite, coltan and gold, get sourced in the supply chains.
  
- **Supply chain**
  - to use reasonable efforts to promote among its suppliers compliance with this Code of Conduct;
  - to comply with the principles of non-discrimination with regard to supplier selection and treatment.
  
- **Internal procedures and controls**
  - to implement appropriate internal procedures and controls to improve and maintain compliance for each of the above goals.

Primetals Technologies reserves the right to reasonably change the requirements of this Code of Conduct due to changes of the Primetals Technologies Compliance Program. In such event Primetals Technologies expects the supplier to accept such reasonable changes.