

Code of Conduct for Suppliers and Third-Party Intermediaries

This Code of Conduct defines the basic requirements placed by Primetals Technologies group members (Primetals Technologies) 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 coming generations, we aim to contribute to the development of society through our passion for engineering, supplies and services for solutions in the iron and steel industry.

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

- **Legal compliance**
 - to comply with the laws and social norms of the applicable legal system(s)
 - to comply with any boycott clauses, black lists, sanctions imposed or re-imposed by any government or relevant institution or other national or international export restrictions.

- **Non-disclosure and intellectual property**
 - 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 protect intellectual property rights of Primetals Technologies and other third parties
 - to use the intellectual property rights of Primetals Technologies only with prior written consent and solely for the purpose of business activities in collaboration with them.

- **Prohibition of corruption, bribery and fraud**
 - 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 corruption or bribery, including payments or other forms of benefits granted to a government official to influence decision-making in violation of the law
 - to share and disclose information related to corruption, bribery and fraud proactively and to ensure accountability to society and corporate transparency
 - to neither demand nor provide benefits, gifts, or services
 - to act with honesty, fairness and integrity and to refrain from any act or omission in connection with fraud or other criminal activities.

- **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 harassment, coercive, threatening, abusive or exploitative
 - to provide fair remuneration to guarantee the applicable national statutory minimum wage and 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 ergonomic working environment.
- **Prohibition of child labor**
 - to employ no person under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, to employ no person 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 and 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 and use a reasonable environmental management system.
- **Prohibition on slavery, human trafficking and conflict minerals**
 - to ensure that there is no modern slavery and human trafficking in the supply chains or in any part of its supplier’s business
 - to have an appropriate anti-slavery policy in place 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 supplier’s compliance with this Code of Conduct
 - to comply with the principles of non-discrimination with regard to supplier selection and treatment.
 - to produce, store, prepare and load in secure business premises and secure loading and shipping areas which are protected against unauthorized interference during production, storage, preparation, loading and transport
 - to employ reliable staff for the production, storage, preparation, loading and transport of these goods

- that business partners who are acting on its behalf are informed that they also need to ensure the supply chain security as mentioned above.
- **Cyber Security**
 - to have a reasonable Information Security Management System (ISMS) or similar in place to manage business partner information
 - to provide trainings for common Information Security aspects to employees, but at least with special focus on e-mail attacks (CEO fraud, bank account changes, etc.)
 - to have a set of Information Security policies in place (e.g. password policy, antivirus, device authentication, ...).
- **Internal procedures and controls**
 - to implement appropriate internal procedures and controls to maintain and improve compliance for each of the above goals.

Primetals Technologies reserve 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 expect the supplier to accept such reasonable changes.