



ALUMAN S.A.
ALUMINIUM SLUGS MANUFACTURING

SUPPLIER CODE
OF CONDUCT

1. COMMITMENT

ALUMAN S.A. recognizes that our supply chain activities can have wide ranging social and environmental impacts and that our responsibility extends beyond our own operations, into our supply chain.

We are committed to socially and environmentally responsible procurement and have set high standards for the way we do business so our customers and other partners know we can be trusted.

Our business mindset requires that we work only with Suppliers who have the ability to consistently meet our standards and specifications and are committed to values of conduct that are compatible with our own.

This commitment is reflected in our Supplier Code of Conduct (“Code”), that sets out the minimum standards of behavior we require of our Suppliers.

We ask our Suppliers to not just comply with the Code, but to use reasonable endeavors to exceed it and promote continual improvement throughout their business operations.

The United Nations Sustainable Development Goals (SDGs) invite action from the private sector to address some of the world’s most pressing development issues. Situated in a broader ethical sourcing framework, our Supplier Code of Conduct is one-way ALUMAN S.A. aligns with the SDGs.

2. APPLICATION AND ACCEPTANCE

The Code is applicable to all contract Suppliers and business partners, who are expected to cascade these requirements to their own supply chain.

Sustainability and compliance with this Supplier Code of Conduct are part of the criteria ALUMAN S.A uses during Supplier selection, and this Code is applicable to all of our Suppliers and their affiliates.

Suppliers must diligently provide official answers, documents, certificates related to sustainability as soon as it is requested by ALUMAN S.A.

Adhering and signing this Code of conduct is therefore a requisite to do business with ALUMAN S.A.

3. ASSESSMENT

By adhering to this Supplier Code of Conduct, each Supplier accepts to be assessed or audited by ALUMAN S.A. or by a third party mandated by ALUMAN S.A.

In case of violation of this Code of Conduct, ALUMAN S.A. will determine corrective actions with the violating Supplier which can include termination of our business relationship.

4. COMPLAINTS AND CONCERNS

If suppliers want to express any concerns or report an incident that came to their attention during a visit to the company's facilities or during collaboration, which involves: discrimination, harassment, bullying, violence, workplace safety issues, violation of labor laws, violation of health and safety laws, violation of environmental laws, violations regarding personal data, bribery, violation of the gift policy, fraud, corruption, conflict of interest, accounting irregularities, embezzlement, antitrust violations, they should send an email to the integrity hotline.

aluman.ethics@aluman.gr

This is possible by visiting the company's website www.aluman.gr where under the tab CONTACT US, there is an option for INTEGRITY LINE which immediately leads to a page with instructions.

Personal information may be included or anonymity may be maintained to allow full freedom of expression. In any case, the identity will remain strictly confidential. There will be no retaliation of any kind due to the use of the reporting channel.

When reporting an incident, as many details as possible should be provided, including the date, time, location, and names of any witnesses or individuals involved. This will help to thoroughly investigate the matter.

Within 7 days of sending the email, confirmation of receipt will be sent by the R.P.R.A. (Responsible for Receipt and Monitoring of Reports). Upon receiving the email, the R.P.R.A. will immediately inform the Plant Manager and the Human Resources Manager, who will form an investigation committee consisting of the two aforementioned individuals and the head of the relevant department. The committee will investigate the complaint immediately and in detail and will take the necessary actions. To ensure complete transparency and information during the process, there will be updates on the progress of the investigation and the final response.

The final response (depending on the nature of the complaint) will not exceed 3 months. (The 3-month period only applies to serious complaints that require extensive investigation).

5. GOVERNANCE & ETHICS

ALUMAN S.A. conducts its business in accordance with the highest standards of ethical behavior and in accordance with all applicable laws and regulations and expect its business partners to do the same.

i. Compliance

- Suppliers must comply with all applicable local laws and regulations, including laws and regulations in all the countries in which they operate.

ii. Management System, transparency and disclosure of information

- In order to be able to prevent or report any issues on application of laws or of this Code of conduct, Suppliers should have a formal system to establish rules and indicators, keep records and trigger corrective actions, endorsed by senior management of the Supplier.
- Suppliers shall at any moment and upon request of ALUMAN S.A. or other appropriate parties be able to disclose information and performance indicators on business activities, Labor, health and Safety and environmental practices.
- Suppliers shall also make available financial statements in accordance with accounting principles and local laws.

iii. Business integrity, anti-corruption and anti-Bribery policy

- Supplier shall not be involved directly or indirectly in any scheme of bribery, kickbacks, extortion, corruption, and similar prohibited business practices.
- Suppliers shall have written policies prohibiting these practices and shall train employees and subcontractors accordingly.
- These policies shall include possibilities for workers to report misconducts without fear of retaliation.
- Suppliers shall keep records and be able to provide evidence of the compliance with this section.

iv. No improper advantage

- Suppliers must not offer or accept bribes or other means of obtaining undue or improper advantage.
- Any business courtesy (meals, company gifts and entertainment) must be of reasonable value and frequency according to local business practices.

v. Conflict of interest

- Suppliers shall avoid any situation where a Supplier 's employee has a privileged information or relationship (e.g.: family relation) with ALUMAN S.A. employee who can influence or make decisions favoring the Supplier's business. Such situations must be disclosed by the Supplier.

vi. Fair business and competition

- Supplier does not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of fair competition laws or antitrust laws that govern the jurisdictions in which it conducts business.

vii. Intellectual property and confidential information

- Supplier respects the intellectual property rights of others.
- Supplier takes appropriate steps to safeguard and maintain ALUMAN S.A.'s confidential and proprietary information.

viii. Data Protection

- Suppliers shall ensure it complies with the data protection laws and particularly the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), where applicable.

ix. Responsible Sourcing and Conflict Minerals

- Suppliers shall exercise due diligence on the source of materials and make their due diligence measures available to ALUMAN S.A. on request, in order to make sure there is no conflict with applicable laws or this Code.
- Suppliers that are sourcing raw materials such as the tantalum, tin, tungsten and gold (known as "conflict minerals") shall ensure that this trade does not directly or indirectly finance, or benefit armed groups that are perpetrators of serious human rights abuses.

6. LABOR AND HUMAN RIGHTS, HEALTH & SAFETY

ALUMAN S.A. is committed to uphold human and labour rights of workers, and to treat them with dignity and respect as understood by the international community, in the proper conditions of health and Safety. We require our Suppliers to also commit to these values.

I. Prevention of Child Labour & Young Workers.

- Child labour should not be used at any level of the supply chain in accordance with the Convention of the International Labour Organization.
- Young Workers, those under 18 years of age, shall not perform work that is likely to jeopardize their health or safety nor interfere with their education.

ii. Humane Treatment and anti-harassment.

- There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

iii. Anti-discrimination

- Suppliers shall not discriminate against any worker based on their age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership.
- This applies for recruitment, salary, promotion or termination matters.

iv. Voluntary Employment

- Forced, bonded (including debt bondage) or indentured labour or involuntary prison labour shall not be used Suppliers.
- Suppliers shall not be complicit to any form of slavery or human trafficking.

v. Working Hours, wages and benefits

- Suppliers shall follow all applicable laws with respect to working hours, wages and benefits.
- Workers shall not be required to work more than 60 hours per 7-day week, including overtime, and shall be allowed at least one day off every seven days.
- Overtime shall be compensated at the prevailing overtime rates.

vi. Freedom of Association and Collective Bargaining

- Suppliers are to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

vii. Health & Safety

- Suppliers shall ensure a safe and healthy work environment, by evaluating and managing occupational health and safety hazards.
- Suppliers should establish Occupational Health & Safety leadership and management system, including emergency plans, response procedures and corrective actions.
- Suppliers shall provide workers with appropriate personal protective equipment training on their use.
- Suppliers shall comply with the European REACH regulation.

7. ENVIRONMENT

ALUMAN SA is committed to environmental protection and to conduct business in an environmentally sensitive manner and wants its Suppliers to do the same.

i. Management system

- Suppliers shall have systems in place to ensure safe management of waste, air emissions and wastewater discharges, eventually integrated with the Health and Safety management system.

ii Environmental Permits and Reporting

- All required environmental permits and registrations are to be obtained, maintained and kept current and their operation and reporting requirements are to be followed.

iii Resource Reduction

- Suppliers are committed to ensure the efficient use of resources and ensure that waste of all types are reduced or eliminated at the source or by practices such as maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

iv Greenhouse Gas Emissions and Energy Consumption

- Suppliers should look for cost effective methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions.

v Waste Management

- Suppliers shall identify all potential waste streams and ensure processes are in place to manage these in line with the waste hierarchy and all applicable regulations.

vi Wastewater generated from operations

- Industrial processes and sanitation facilities are to be characterised, monitored, controlled and treated as required prior to discharge or disposal.

vii Hazardous Materials Chemicals and other materials posing a hazard

- Suppliers are to actively avoid causing environmental damage and/or negative environmental impact through their operations.
- If released to the environment these products are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal
- Suppliers shall regularly review the use of hazardous substances and substitute them with less hazardous alternatives where reasonably practicable.

viii Product Content Restrictions

- Suppliers shall adhere to all applicable laws and regulations and customer requirements regarding prohibition or restriction of specific substances including labelling for recycling and disposal.

STATEMENT OF RESPONSIBILITY

The company, [.....], recognizes the Supplier Code of Conduct of ALUMAN S.A. and all applicable laws. We undertake to comply with the Code and take corrective action if there is a non-compliance. We understand that ALUMAN SA reserves the right to terminate its business relationship with any Supplier who is not willing to comply with this Code. By signing this statement, we undertake to implement the Code and to share our progress with ALUMAN SA.

Name of Company: _____

Name and title: _____

Signature and seal:

Tagged with: _____

Date : _____

Validity of the Code of Conduct

ALUMAN S.A reserves the right to reasonably change the requirements of this Supplier Code of Conduct due to changes to the Company's Code of Conduct and Business Ethics. In such an event ALUMAN S.A. will inform its Suppliers and expects them to accept those reasonable changes.

The Supplier Code of Conduct was approved by the Administrative Board of ALUMAN SA and can only be amended or revoked by it.

ALUMAN S.A annually reviews and evaluates the Code of Conduct .Every five years, the Code of Ethics is reviewed and updated