

Code of Conduct for Suppliers

According to the internally applicable Code of Conduct, (<https://www.alupak.com/en/alupak-code-of-conduct/>) alupak is duty bound to meet the highest standards in matters of integrity, sustainability and ethical behaviour. alupak declines to accept either unethical or illegal business practices (for example bribery or corruption). Accordingly, while acting on behalf of alupak all suppliers are required to behave fairly and ethically without exception, guarantee safe working conditions, and meet ecological requirements. alupak demands from its suppliers that they keep to the rules of conduct set out in this Code of Conduct for suppliers (hereinafter "Code"), all pertinent laws and regulations as well as the contractual agreements with alupak. This Code contains the most important principles for the Supplier's business activities as well as its dealings with human rights, working conditions, health and safety regulations, environmental protection regulations as well as ethically faultless business behaviour.

Infringements against this Code may seriously endanger, or even lead to a complete severance of the business relationship between alupak and the Supplier. This Code applies to all suppliers, their subsidiaries and sub-suppliers that supply goods or provide services to alupak.

1 Observance of statutory regulations

The Supplier shall abide by all laws and regulations in force in the countries it is operating in. Should laws in the country in question be less stringent than those codes of behaviour set out in the Code, the Supplier shall keep to the guidelines as listed here.

2 Employment and human rights

The Supplier shall treat its employees with dignity and respect and maintain the highest standards in force for human rights. In particular, the Supplier is duty bound:

- not to tolerate any child and forced labour, human trafficking or any type of modern slavery;
- to forbid any type of forced or involuntary prison labour. All employees shall have the opportunity to part company with the employer within an appropriate period of time;
- not to tolerate any inappropriate behaviour such as gesturing, vulgar language or physical contact of a sexual, coercive, threatening or offensive nature;
- to forbid any discrimination based on gender, age, ethnicity, nationality, religion, civil status, disability or sexual orientation;
- to compensate its employees appropriately and in line with the local regulations on compensation and/or collective employment contracts. Should there be no such provisions, the salary shall be of a suitably adequate level to cover costs arising from basic requirements and to provide for a modest level of well-being;
- not to reduce salaries for disciplinary reasons subject to other legal regulations;
- to ensure that working hours including overtime do not exceed the highest legally permitted number of working hours. Should there be no corresponding regulation, weekly working hours including overtime shall under no circumstances exceed 60 hours;
- to ensure that employees receive at least two free days per week;
- to ensure that the statutory and typical local working conditions are kept to;
- allow employees within the realms of the statutory legal framework to form and join;
- trade unions and be permitted to negotiate together as a collective with the employers without hindrance, discrimination, retaliatory measures or harassment.

3 Safety at work

alupak considers the health, safety and well-being of the Supplier's employees to be important. The Supplier shall ensure safe and health-protective working conditions for all its employees and apply operative measures to protect health and guarantee adequate safety.

In particular, the Supplier commits to:

- identifying, analysing and reducing health risks by a danger limitation procedure, reduction of potential for danger and with the aid of operative and administrative controls;
- equipping all employees with suitable and well-maintained protective equipment and instruct the employees in its use;
- guaranteeing that all employees receive regular health safety training in the official state language, or in English or another appropriate language if some are not adequately familiar with the state language;
- identifying potential emergency scenarios as well as preparing emergency plans and reaction processes to lessen potential damage to life and limb, the environment or property.

4 Environment

alupak considers environmental protection to be important. The Supplier must act in an environmentally friendly and sustainable manner, not only in its internal processes and manufacturing methods, but also in the choice of stakeholders, transports and sourcing of energy, resources and materials (direct/indirect material). It is in particular duty bound to:

- strive for using recyclable materials;
- recycle as much as possible throughout the entire supply chain;
- identify and label all substances used and limit their use within the realms of possibility, recycle them and dispose of them appropriately;
- avoid, or if not possible identify any polluting, toxic or other dangerous substances and ensure their correct application, delivery, storage, recycling and disposal;
- prevent deforestation and draining water resources;
- reduce the usage of resources, such as energy, water, forest, metals, minerals, chemicals etc. and take potential alternative measures;
- have an established waste management system;
- evaluate, control and reduce the quantity of waste from natural resources;
- respect use of land and natural resources to maximum extent;
- avoid the impact on ecosystems and biodiversity;
- obtain, and if required renew, all necessary environmental permits, and in general ensure that all environmental regulations are kept to;
- act according to applicable laws, respect of human rights, natural resources and territories.

5 Environment – Conflict materials and banned substances

alupak is committed to honouring all regulations in force pertaining to banned dangerous substances and conflict materials and meet such requirements from its clients.

The Supplier must ensure that during delivery of its goods to alupak, all rules in force must be kept.

6 Environment – Continuous improvements and best practice

The Supplier must strive always for exercise best practices in its context and throughout the whole supply chain (as well as up- and downstream) minimize or eliminate negative impacts on the environment and its ecosystems, and, where possible, promote, restore and improve the environment and ecosystems that it affects.

Actions to inform about risks, respond to new evidence and implement improvements regarding use of resources and exploitation of the environment and its ecosystems must always be supported and promoted. External individuals, employees, whistleblowers, stakeholders or organizations that in good faith provide information and high lights internal or external connected supply chain failures, must be emphasized and not, in any way be subjected to reprisals, threats, extortion or similar.

7 Ethical business conduct

alupak keeps to the highest ethical standards in all its activities.

Accordingly, the Supplier shall maintain alupak's high ethical requirements with regards to the organization of its commercial activities and practices, as well as in matters pertaining to purchasing and production of goods. In particular, the Supplier is committed to:

- distancing itself from all forms of corruption and blackmail and in particular ensuring;
- that any donations to clients, representatives of authorities and other third parties are in accordance with the anti-corruption laws in force;
- always ensuring that all applicable anti-corruption laws and the regulations on competition in force in the countries it operates in are kept to;
- informing alupak about its commercial activities and its efforts to improve and maintain employee safety measures;
- respecting intellectual property rights and taking measures to adequately protect these and other such confidential client information;
- informing alupak about potential conflicts of interest;
- preventing businesses with sanctioned companies/individuals;
- respecting sanctions and embargos;
- keeping to internationally valid trade and import/export regulations.
- avoiding conflict of interests.

In addition to the Code, the internal regulations and directives remain valid. The internal regulations and directives are based on this Code and provide further guidelines for action.

8 Investigations

In order that the maintenance of all regulations of behaviour listed in this Code be guaranteed and tested, the Supplier shall commit to

keeping all necessary documents and supplying these to alupak upon request. alupak reserves the right to audit the Supplier's activities and production facilities at its own cost and after appropriate advance notification. If the results of such an audit or investigation demonstrate that the Supplier has not maintained its duties as per this Code, it shall agree to implement the appropriate measures promptly. alupak will support the Supplier within the realms of feasibility in meeting these requirements. Infringements against this Code may lead to potential demands for compensation, suspension or termination of business relationships (including contracts, agreements and orders) between alupak and the Supplier.

9 Reporting non-compliances

Suppliers must notify alupak of any actual or potential severe adverse impact on human rights or the environment, keeping alupak informed of the progress of any investigation and shall, if requested, consult alupak regarding all material steps in the process until remediation. Severe adverse impacts must be notified to the following e-mail address:

einkauf@alupak.com

Suppliers must retain all supporting documents and evidence to maintain an adequate record of all due diligence processes, grievances submitted by affected stakeholders, including records related to investigations undertaken, and grant access to alupak to review such records upon demand. Upon alupak's first demand, the supplier must send a report with detailed information on what has been achieved, a detailed progress plan and, if requested, undergo a verification process of compliance. If alupak's consider that their customers are affected by this non-compliance, alupak is entitled to pass on this information to the customers and keep them informed of the developments, the action plans and the outcomes.

Date / Location:

Name of Supplier:

Name and title:

Signature:
