

# | ALUMECO GROUP - EMPLOYEE CODE OF CONDUCT |



## **Introduction:**

This Code of Conduct applies to all employees in the Alumeco Group companies (Alumeco A/S or its affiliated companies, hereinafter; “Alumeco Group”) and defines the basic requirements placed on the Alumeco Group.

Alumeco Group’s business vision and concept is to offer products that create the best possible competitiveness for our customers, in respect of and in compliance with socially, environmentally and ethically sustainable behaviour from the Alumeco Group and our business partners.

Alumeco Group and all of our sub-suppliers, suppliers and business partners must support the Ten Principles of the UN Global Compact and must, at all times, ensure:

## **Legal compliance:**

- to comply with all relevant laws and regulations and ensure legal compliance through training, awareness, operational control and monitoring.

## **Anti-corruption:**

- to never engage in any form of bribery, facilitation payment, corruption, extortion or embezzlement, or any illegal method to influence public officials, the judiciary or third parties.

## **Human rights:**

- to support and respect the protection of internationally proclaimed human rights stated in the International Bill of Human Rights and the International Labour Organisation’s (ILO) declaration on Fundamental Principles and Rights at Work.
- to be non-complicit in human rights abuses.
- to not engage in or support discrimination based on race, skin colour, sex, language, religion, political or other opinion, social class, national or social origin, property, birth, union affiliation, sexual orientation, health status, family responsibilities, age, disability or other distinguishing characteristics.
- to base all employment related decisions, such as hiring, remuneration, benefits, training, advancement, discipline, contract termination and retirement only on relevant and objective criteria.
- to not use or benefit from child labour and in all circumstances comply with the minimum age of employment stated in the ILO conventions and national regulations. The minimum age for employment shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years (or 14 years where established by national laws in accordance with the ILO developing-country exception).
- to not involve employees under the age of 18 in potentially hazardous work.

## **Labour:**

- to provide safe and healthy working conditions and protect employees from hazards and dangers in the workplace. All health and safety policies and procedures must comply with applicable laws and regulations and must be followed by all employees.
- to respect the rights of employees to associate freely and join (or not join) worker’s organisations of their own choice. There shall be no dismissals, discrimination, harassment or intimidation due to association or union.
- to not participate in or benefit from any type of forced, bonded or indentured labour or human trafficking. Workers shall be allowed to move around freely and leave their workplace when their shift ends.
- to comply with all local laws and regulations regarding wage, overtime wages, sick leave and other elements of compensation.
- to grant all workers at least one day off in every seven-day period.

## **Climate and environment:**

- to maintain awareness of current environmental legislation and ensure legal compliance.
- to work systematically to prevent adverse climate and environmental impacts from activities, products and services by means of a proactive approach and responsible management.
- to report on climate and environmental impacts and strive to make continuous improvements.
- to strive towards minimising climate and environmental pollution.

## **Data security:**

- to follow all legal requirements for data protection and to protect privacy and rights regulated by the General Data Protection Regulation (GDPR).

We expect all of our employees to know and follow the Alumeco Group Code of Conduct. The Alumeco Group will not tolerate any wrongdoing with respect to this Code of Conduct. Failure to follow the Code of Conduct can result in disciplinary action, including termination of employment. We will support all employees who report violations as well as those who request assistance or have concerns. If you detect any concerns or illegal or unethical business behaviour, you must report it to your manager or by using our whistleblower scheme. You can also file a report online through the hotline on <https://alumeco.integrityline.com>. The system guarantees confidentiality and anonymity. All data provided will be subject to data privacy regulations. For more information please consult Alumeco Whistleblower Policy.

*Odense, January 2022*

A handwritten signature in blue ink, appearing to be 'Per Thanning Johansen'.

Per Thanning Johansen

Alumeco Group CEO