

Code of Conduct

– for suppliers

Ernströmgruppen aims to build better companies for future generations.

We build independent, industrially logical business areas with the aim of contributing to a society in which people, the environment and the economy are the focus.

1. Introduction

At Ernströmgruppen, we and our subsidiaries shall conduct business in an ethical and overall responsible manner. Ernströmgruppen therefore works with carefully selected suppliers and partners who share Ernströmgruppen's values and who live up to the requirements of this Code of Conduct for Suppliers. Ernströmgruppen Code of Conduct for Suppliers outlines our business principles and expectations for our supply network. This involves identifying, preventing, mitigating, and addressing human rights, environmental and governance impacts in both our operations and supply chain. We expect our suppliers to have the same commitment towards suppliers, its sub suppliers and onwards.

The purpose of Ernströmgruppen Code of Conduct for Suppliers is to define minimum requirements for all suppliers to Ernströmgruppen within the following areas:

- Legal Compliance
- Human Rights
- Health & Safety
- Resources
- Environment
- Business Ethics

1.1. International Framework

We support the UN International Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and inspired by the United Nations Convention against Corruption as outlined in the ten principles of the United Nations Global Compact. We adhere to these principles as well as the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights and expect the same from our suppliers.

1.2. Application of the Code of Conduct for Suppliers

The Code of Conduct for Suppliers applies to all suppliers delivering goods and/or services to Ernströmgruppen and its subsidiaries, including affiliate entities, as well as their respective employees and agents. The term "employee" in this Code of Conduct for Suppliers includes everyone working for or on behalf of a supplier, such as full-time and part-time employees, consultants, contractors, trainees, temporary workers, management, and board members. The term "employees" additionally refers to vulnerable groups, including young workers and migrant workers.

Ernströmgruppen's Code of Conduct for Suppliers is binding, for all suppliers related to any of our companies in the group. It remains the responsibility of the supplier to ensure that its contractors and subcontractors comply with the principles of this Code. Material breach or repeated refusal to provide

required information entitled us to terminate the contract with the supplier.

Upon request, the supplier must also be able to inform their counterparty within Ernströmgruppen about which subcontractors they use. As a condition of doing business with Ernströmgruppen and its subsidiaries, suppliers and subcontractors shall allow Ernströmgruppen and its agents (including third parties) to conduct checks, which may include, for example, confidential interviews with employees, to assess compliance with the Code of Conduct for Suppliers.

2. Speak up!

If a supplier come across a situation that does not appear to conform with the Supplier Code, it is expected to bring this to Ernströmgruppen's attention as soon as possible.

2.1. Whistleblower function

Suspected violations of the Supplier Code are encouraged to be reported to Ernströmgruppen either through a Ernströmgruppen contact person or through our Whistleblower system, available at ernstromgruppen.com or at the website of all our subsidiaries. This helps us reduce risks, improve conditions for workers, and maintain our commitment to ethics and sustainability.

All reports submitted to the Whistleblower function are stored in a highly secure system, accessible only by a small team. The function complies with all whistleblowing and data privacy laws, and personal data is deleted in accordance with GDPR, ensuring the reporter's information remains safe.

The Speak Up process

All reports that are received will be evaluated and an internal investigation will be conducted if required. Relevant case details that the reporter provide are recorded in a case management database and an investigator may contact the reporter for further details. The information provided is kept confidential. The reporter can always be anonymous if local laws permit, however, all reporters are strongly encouraged to identify themselves to help facilitate an investigation. The privacy and integrity are of great importance to Ernströmgruppen and subsidiaries. This is particularly relevant if a reporter steps forward to report a concern or suspected breach of Ernströmgruppen's Supplier Code.

3. Legal Compliance

All suppliers, its contractors and subcontractors must comply with the relevant laws and regulations, which apply to their operations in the countries in which they operate. Taxes and other fees must be paid on time. If a conflict arises between the Code of Conduct for Suppliers and national legislation, national legislation takes precedence. If the Code of Conduct for Suppliers has requirements more precisely or more than the national legislation, the Code of Conduct for Suppliers shall apply.

In case of any conflict between the Supplier Code and applicable laws, suppliers must inform the relevant company contact. This ensures adherence to high ethical standards and legal compliance, maintaining the integrity of the business relationship.

4. Human Rights

4.1. Forced labour and abuse

Ernstströmgruppen does not tolerate any forms of Modern slavery in any form, including forced, bonded, or compulsory labour, servitude, deceptive recruiting, descent-based slavery, and human trafficking. This includes all involuntary work and situations involving coercion, mental or physical threats or abuse, abuse of power, and deception.

The supplier shall have adequate policies, risk awareness, risk assessment and due-diligence processes in place to prevent modern slavery and forced labour throughout its supply network.

4.2. Child labour and young workers

Ernstströmgruppen does not tolerate child labour and shall not employ children who have not reached the legal age for employment. Suppliers must work to prevent child labour in their operation and supply chain and ensure legal working conditions for young workers, in line with the UN Convention on the Rights of the Child. The minimum age is that year compulsory schooling is completed, but never lower than 15 years (or 14 years in the case of national legislation allows this).

4.3. Working hours and wages

Ernstströmgruppen believes that there should be a healthy work-life balance for all employees of our suppliers. All employees, including seasonal staff, must have an employment contract written in a language they understand and specifying working hours, pay and holidays. The employees' working hours and wages including overtime and benefits must correspond to, or exceed, national legislation, industry standards or collective agreements in force, whichever is higher. The salary may not, according to any disciplinary practice, be deducted as a fine or punishment.

4.4. Non-discrimination and harassment

Ernstströmgruppen does not tolerate any form of discrimination or harassment. Threats of violence, punishment, physical or verbal abuse or other unlawful harassment are prohibited. Suppliers must treat everyone with dignity and respect, offering equal employment opportunities based on an individual's ability to perform the job, regardless of characteristics such as:

- Gender, gender identity, or expression

- Age
- Nationality, race, ethnicity, skin colour, or cultural background
- Religion or belief
- Disability, genetics, or health information, including pregnancy
- Sexual orientation
- Union affiliation

For example, in all decisions on employment, promotion, compensation, benefits, training, lay-offs and dismissal, the employer must strictly assess an employee's ability based on their ability and merits.

Suppliers are encouraged to actively promote diversity and inclusion, providing equitable benefits and working conditions that accommodate all aspects of human diversity.

4.5. Freedom of association and the right to collective bargaining

Ernstströmgruppen's suppliers shall respect employees' right to exercise their legal rights to form, join, or refrain from joining organizations that represent their interests as employees. No employee shall be subject to intimidation or harassment for the peaceful exercise of these rights. This means, among other things, that the employer must respect the employee's right to bargain collectively.

5. Health and Safety

Suppliers must provide a safe and healthy working environment in compliance with all applicable laws and take all feasible steps to prevent incidents and injuries for their employees, contractors and subcontractors. Suppliers must have an adequate, risk-based health and safety approach, including, for example, providing relevant instructions and training that is understandable to all employees and also ensure that employees have appropriate protective equipment and the right training to perform their work.

6. Resources

Ernstströmgruppen requires suppliers dealing with raw materials and components containing tantalum, tin, tungsten, gold (3TG) or cobalt to perform adequate due diligence following the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Upon request from Ernstströmgruppen, suppliers shall submit a valid CMRT (Conflict Mineral Reporting Template) and/or CRT (Cobalt Reporting Template) report.

7. Environment

At Ernströmgruppen, we work systematically to reduce the environmental impact of our operations. Suppliers and their subcontractors must comply with national legislation regarding environmental impact.

Suppliers must also have procedures in place to minimise resource use and environmental and climate-impacting emissions and ensure environmental considerations in the choice of materials and chemical product content. Ernströmgruppen prioritises collaboration with suppliers who systematically improve their environmental work through clear targets and follow-up, and who offer innovative solutions to society's environmental challenges. In the work, suppliers must apply a life cycle perspective regarding the environmental impact of products and services, as well as set relevant environmental requirements for subcontractors.

Suppliers must pay the social, environmental and economic costs that arise should their business cause damage to the environment. Suppliers must control, measure, document and plan their work to minimize the environmental impact of their business in particularly the following areas:

- Greenhouse gas (GHG) emissions
- Circularity
- Chemicals and hazardous substances
- Waste
- Other emissions to air, water and soil
- Energy consumption
- Water consumption

8. Business Ethics

8.1. Sanctions

Sanctions prohibit business with certain countries, individuals, entities, or sectors and are used by governments and other bodies to influence foreign affairs. Among other things, there are sanctions lists issued by the UN, the EU, UK and the United States. It is prohibited to do business, directly or indirectly, with sanctioned countries, individuals, entities or sectors.

8.2. Information security and personal data

Confidential information about Ernströmgruppen and its subsidiaries' operations or our business partners must be handled with diligence and must not be disclosed to unauthorized persons. Personal data shall be protected and processed in accordance with applicable laws and regulations.

8.4. Competition, countering corruption,

conflicts of interest, gifts and representation

Ernströmgruppen do not accept that we ourselves or our business partners behave in ways that could unduly affect free competition. None of the Ernströmgruppen's suppliers may participate in bribery, price collusion, cartels or take any other measures (or avoid taking measures) in violation of the competition rules in force.

All cooperation between Ernströmgruppen and suppliers must be based on commerciality, business benefit and avoidance of conflict of interest

Business benefit means something that the recipient has a professional benefit from. Decisions made must be made without regard to personal gain. Ernströmgruppen does not accept that any supplier attempts to unduly influence decision-makers at Ernströmgruppen.

Nor is it acceptable to otherwise take or cause to be taken measures that may conflict with the legislation in force at any given time regarding corruption and bribery or the principles of the Ernströmgruppen's Code of Conduct. Ernströmgruppen providers shall therefore in particular ensure that:

- Not act in the relationship with Ernströmgruppen or other partners in such a way that a relationship develops into a position of inappropriate dependence.
- In relation to Ernströmgruppen and other partners, be very restrictive in terms of giving and receiving gifts and other benefits and avoid paying for and receiving travel and subsistence.

By signing it, I certify that the company has read Ernströmgruppens Code of Conduct for suppliers and commits us to comply with it.

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Enterprise

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Date

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Signature

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Name clarification