

Code of Conduct for Elkem's Business partners

Elkem's Code of Conduct for Business Partners is aligned with the UN Guiding Principles on Business and Human Rights and is based upon internationally recognised standards, including the ILO Declaration on Fundamental Principles and Rights at Work. It outlines Elkem's expectations with regards to ethical and legally compliant business practices, human rights, workers' rights, and environmental protection. The Code applies to all Elkem's Business Partners, including suppliers, distributors, agents, resellers / traders, and joint venture partners.

Business Partners may be required to complete self-audit assessments, undergo further audit activities and trainings.

By entering into an agreement with Elkem, the Business Partner confirms to be bound by the following principles and requirements:

Ethical and legally compliant business practices

- Comply with all applicable laws and regulations;
- Not engage in or tolerate any form of direct or indirect corruption or bribery, including offering or accepting improper advantages that may influence decisions;
- Not engage in or tolerate any kind of forced or involuntary labour, modern slavery, trafficking, or other human rights violations.
- Not engage in dealings, directly or indirectly, that involve a breach of sanction regulations, including those issued by the EU and the US
- Operate in accordance with applicable antitrust laws, including rules pertaining to price fixing and market sharing with competitors;
- Forbid and refuse to support money laundering in any form;
- Respect the intellectual property rights of others;
- Protect confidential and personal information;
- Avoid conflicts of interest that may adversely influence business relationships.

Human rights and workers' rights

- Set up and use an appropriate Health and Safety management system and provide its employees with a safe and healthy workplace in compliance with applicable laws and regulations;
- Promote equal opportunity and treatment for its employees irrespective of religion, race, national or ethnic origin, cultural background, social group, disability, gender, sexual orientation, marital status, age, or political opinion;
- Respect the personal dignity, privacy and rights of everyone;
- Refuse to tolerate any unacceptable treatment of employees, such as sexual harassment or discrimination;
- Provide fair remuneration and guarantee the applicable statutory minimum wage or defined living wage where minimum wage is not defined;
- Comply with the maximum number of working hours pursuant to applicable laws;
- Recognise, in accordance with applicable labour laws, the right of free association of employees and to neither favour nor discriminate against members of employee organisations or trade unions;
- Employ no workers under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, employ no workers under the age of 14;
- Limit dangerous work and night work to persons over 18 years of age;
- In all countries except in the US, document all employment with written contracts that describe the conditions of employment in a language understood by the employee and are signed by both parts.

Environment and climate

- Act in accordance with the applicable statutory and international standards regarding environmental and climate protection;
- Minimise the environmental impact of their activities and make continuous improvements in environmental and climate protection;
- Set up and use an appropriate environmental management system that a) minimises the negative impact on the environment and climate due to manufacturing processes or handling of raw materials and b) does not destroy resources or the income base of marginalised population groups through manufacturing or withdrawal of raw materials;
- Take reasonable efforts to avoid the use of conflict minerals/raw materials that directly or indirectly finance armed groups that violate human rights.

Supply chain

- Make reasonable efforts to ensure that their Business Partners comply with this Code of Conduct or a code that contains equivalent terms.

Speak up

Elkem is committed to an open and honest culture, where our business partners can report legitimate concerns with confidence.

Contact Elkem Compliance through the Speak up channel, your independent, confidential channel for reporting misconduct or wrongdoing related to Elkem.

You can leave a written message or voice message in your own language. You can choose to remain anonymous.

<https://elkem.integrityline.com/>



As Elkem's Business Partner we hereby commit ourselves to comply with the requirements of this Code of Conduct:

Company name:	Date/Place:	Name and function:	Signature: