DOING BUSINESS WITH SAFIC-ALCAN

Third-Party Code of Conduct

SAFIC ALCAN
innovative solutions

Letter to our stakeholders

Committed to the United Nations Global Compact (UNGC) and Responsible Care Initiative, over the past several years, Safic-Alcan and its subsidiaries ("Safic-Alcan") have developed a growth strategy using Sustainable Development as the engine for innovation.

Based on these commitments, Safic-Alcan is committed to conducting all of our business activities to secure a sustainable and ethical business relationship in accordance with the applicable laws and standards in the jurisdictions in which we operate.

At Safic-Alcan, we strive to conduct business with suppliers and third-parties providers ("Third-Parties") who produce products for, or provide services to Safic-Alcan to conduct business responsibly, with integrity, honesty and transparency.

As such, we have implemented for many years the Third-Party Code of Conduct ("Code") which defines fundamental principles in essential areas, such as human and labour rights, environmental protection, the fight against corruption and business ethics.

With this Code, derived from Safic-Alcan's Code of Conduct and our ESG strategy, we aim not only to protect our mutual interests but also aim to ensure and promote responsibility throughout our value chain.

We require our Third-Parties to acknowledge this Code and confirm they will operate in line with its principles by signing the attached ACKNOWLEDGEMENT FORM. We strongly encourage them to ensure that their own supply chain upholds the principles of this Code or similar standards.

We thank everyone in advance for their commitment. We know we cannot make meaningful progresses alone and we hope that this code can reinforce respect for these principles in all our value chain.

Safic-Alcan Executive Committee

KEY PRINCIPLES TO RESPECT

Safic-Alcan's objective is to build long-term, ethical relationships with its Third-Parties. For Safic-Alcan some of the key success factors are transparency and collaboration for continuous improvement in business practices including ESG areas to align performances, and legal and market needs.

This Third-Party Code of Conduct is based on five key principles to respect when doing business with Safic-Alcan:

Respect Labour and Human Rights

Third-Parties shall respect the rights and dignity of all workers and shall commit to upholding the Human Rights of the workers and encourage the development of employment practices including:

- Guaranteeing compliance with applicable national laws and regulations of the country in which their workers are employed relating to wages, working hours, overtime, and benefits.
- Respecting the rights of lawful association and recognizing the right to collective bargaining.
- Protecting their fundamental freedoms by preventing involuntary or underage labour or use of any form of child labour or other forced, bonded, or indentured labour, including human trafficking and modern slavery.
- Preventing and eliminating any form of difference in compensation, hiring, and employment by creating a workplace free of harassment, discrimination or any other form of abuse, including sexual harassment or offensive behaviour.
- Informing Safic-Alcan if any of the minerals integrated into the products supplied fall into the category known as “conflict minerals”. If so, Third-Party are to provide the legally required information to ensure they meet international standards of minerals responsible sourcing. That is of the utmost importance to prevent child labour, forced labour and the financing of armed groups in politically unstable areas.

Ensure Business Ethics and Compliance

Third-Parties are expected to comply with all relevant and applicable laws, rules and regulations and to strive to conform to the usual industry standards of the business in which they are involved and the country in which their workers are employed.

Safic-Alcan has defined expectations for its employees in its Code of Conduct to promote honest, legal and ethical conduct and expects its Third-Parties to respect the following provisions when doing business with Safic-Alcan:

- **Corruption & Bribery :**

Third-Parties shall comply with all applicable anti-corruption laws, directives and regulations including commercial bribery in all countries in which they operate and shall not engage in corruption, bribery, extortion, or other unethical or illegal practices of any form.

- **Conflicts of interests :**

A "*conflict of interest*" occurs whenever the prospect of direct or indirect personal gain may influence the business judgment or actions of an employee when conducting business.

Third-Parties are expected to ensure that Safic-Alcan employees avoid a situation where a conflict of interest may occur. Should such a situation arise, Safic-Alcan expects its Third-Parties to provide notification to all affected parties so the risk can be properly considered, and the right action taken.

- **Gifts and Entertainment :**

Safic-Alcan recognizes and respects that occasional business-related entertainment or exchanges of gifts with its business partners can be exchanged depending on local cultures and their laws. Safic-Alcan expects its Third-Parties to respect that its employees must not provide or accept excessive or inappropriate entertainment and may only offer or accept non-cash gifts of modest value occasionally.

It must not be perceived as an alteration of normal business judgment concerning any transaction or impair the employee's loyalty to its values.

- **Competition & Antitrust Laws :**

Third parties must never engage in or support unfair or predatory business practices or any activities that would improperly restrain trade. It is also critical that Third-Parties avoid any activity that could violate competition laws.

- **Global trade compliance :**

Third-Parties must comply with trade sanctions and similar restrictions issued by recognized authorities.

Third-Parties must ensure that their business practices are in accordance with all applicable laws, directives and regulations governing counterfeit or the import and export of products, and technical data, and shall provide required information, and obtain export licences and/or consents where necessary.

- **Information protection : property rights and privacy**

Safic-Alcan commits to protecting data privacy. More information can be found at www.safic-alcan.com/privacy-protection.

As such, Third-Parties shall ensure that they collect, use, retain, disclose, and dispose of personal data in conformity with all data protection and privacy laws relevant to the locations in which they operate. This shall include data relating to Safic-Alcan and its employees.

As well, Third-Parties must respect intellectual property rights, protect trade secrets and confidential information, and ensure that the transfer of technology and know-how is conducted in a manner that protects intellectual property rights.

Protect Health and Safety

Third-Parties must be committed to providing a safe and healthy workplace and working conditions by:

- Providing appropriate worker protections for their employees;
- Maintaining process safety programs to prevent or mitigate catastrophic events including but not limited to fire, accidents, and natural disasters;
- Conducting risk assessments and implementing emergency preparedness plans and response procedures;
- Providing safety and hazard information to ensure the safe use of their products.

Act with Respect for the Environment and Product Responsibility

Following its UNGC commitment, Safic-Alcan takes environmental stewardship to heart. It makes it clear that maintaining safe, sustainable operations not only impacts companies but communities, the environment and our collective future.

As such, Safic-Alcan expects its Third-Parties to minimize the impact on the environment of their activities and develop solutions that contribute to preserving and saving water, resources and energy by:

- Obtaining and complying with all required environmental permits, licenses, information registrations and restrictions.
- Avoiding the use of hazardous substances. In the event no alternative is available, suppliers shall ensure their safe handling and disposal.

- Preventing and minimizing the pollution caused by their activities through avoidance, reuse and/or recycling procedures for generation of waste, hazardous air, soil and water releases, as well as accidental spills and ensuring safe handling, movement, storage and disposal.

- Contributing to reducing the impact of climate change by measuring, committing and deploying an action plan to reduce greenhouse gas (GHG) emissions.

- Preserving natural resources, energy and biodiversity, including respecting animal welfare when applicable.

Report Concerns

All Safic-Alcan employees and Third-Parties with whom it does business are strongly encouraged to report any conduct they believe may be inconsistent with its codes, values or any applicable laws, even if they are unsure of all the facts or do not have all the information.

Safic-Alcan takes all reports of misconduct seriously and treats all such reports confidentially. No disciplinary action or retaliation will be taken against an individual bringing a concern to the Company's attention in good faith.

Any potential concerns may be reported directly to Safic-Alcan's local Management. If contact with local Management is not appropriate, reports can be addressed to Safic-Alcan to the following:

- Email: reporting.concern@safic-alcan.com
- Online: Report Concerns form
- Telephone: +33 1 46 92 74 63
- Mail: 13, Cours Valmy - Tour Pacific, 92977 Paris La Defense Cedex, France

CONTINUOUS IMPROVEMENT

Safic-Alcan invites its Third-Parties to contribute to sustainable development goals through improved performance, expanded economic opportunities and the development of innovative technologies and other solutions to societal and environmental challenges. Safic-Alcan also encourages responsible and sustainable operations in their procurement/supply chains.

Discover our commitment

Safic-Alcan SAS

TOUR PACIFIC

13, Cours Valmy – 92977 Paris La Défense Cedex – France

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