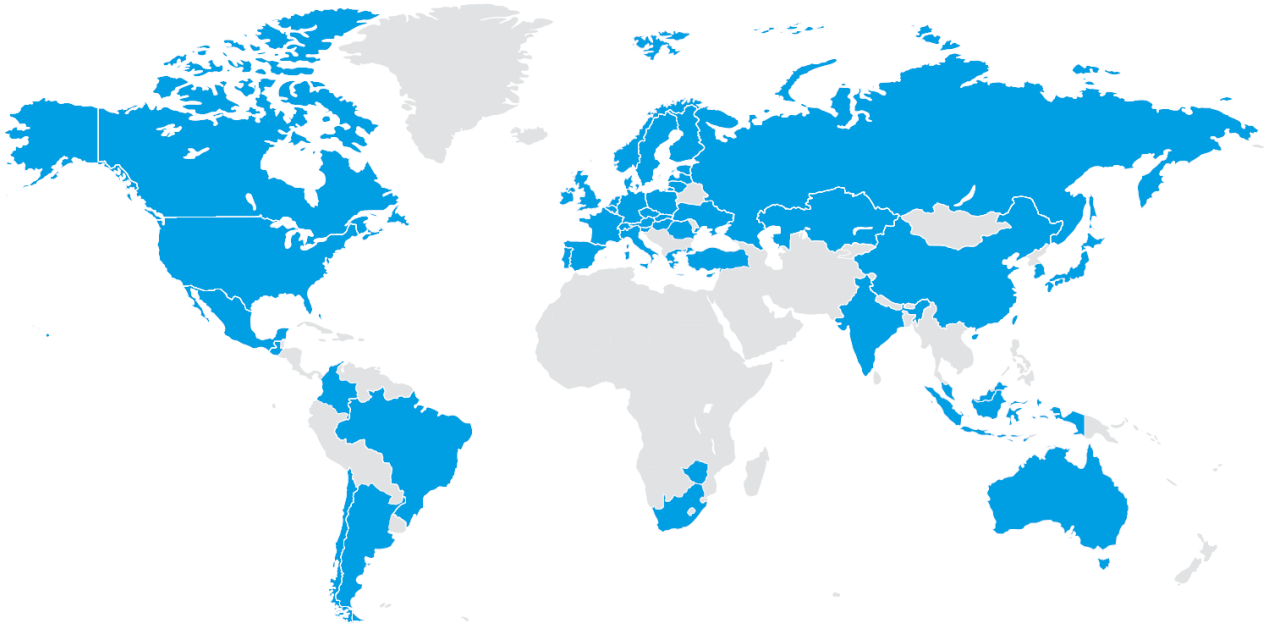




MODERN SLAVERY STATEMENT

Statement based on UK Modern Slavery Act 2015

Outokumpu Oyj is a stainless steel producer in Europe, the United States and Mexico with its own chromite ore mine and ferrochrome production in Finland. 93% of our suppliers are located in the same countries where our production sites are situated. In those locations where we have significant production sites the proportion of spending on local suppliers was on a level of around 90% for general procurement in 2020. Purchasing is centralized and separated into general procurement and procurement of raw materials, including semi-finished goods such as scrap, metal and alloys. The countries where our most important suppliers are located are shown in the following map.



Corporate responsibility is integrated into all our operations, activities and decision making, from the purchasing of the materials to production and logistics. Outokumpu's operations are guided by our Code of Conduct to ensure employees live up to Outokumpu's Ethical Principles, Ways of Working and highest standards of integrity. Outokumpu has revised Code of Conduct and Supplier requirements, incorporating United Nations Guiding Principles on Business and Human Rights. Our four key Ethical Principles

1. Safe and healthy workplace
2. Sustainable future

3. Human rights and dignity
4. Good corporate citizenship

guide the way we at Outokumpu act towards our employees, customers, business partners and society. More guidance is given in Outokumpu's Environment, Health & Safety and Quality Policy, our Corporate Responsibility Policy, Know Your Business Partner Instruction and other company policies and guidelines.

Outokumpu honors internationally recognized human rights as set forth in the International Bill of Human Rights. Outokumpu's commitment to respect human rights is aligned with the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We are committed to ensuring that modern slavery, forced and child labor and human trafficking plays no part in our supply chain or in any part of our business. Outokumpu complies with international, national and local laws and regulations.

Our Code of Conduct reflects our commitment to acting with high integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our supply chain. There is zero tolerance for any kind of discrimination, whether it is based on ethnic origin, nationality, religion, political views, gender, sexual orientation, disability or age. Outokumpu wants to know who its business partners are to ensure Outokumpu is not involved in any unethical, illegal or criminal activities. Policy commitments stipulate human rights expectations of personnel, business partners and other parties directly linked to Outokumpu's operations, products or services.

Outokumpu expects that all suppliers and subcontractors must perform according to the laws and regulations of the countries they operate in and meet Outokumpu Supplier Requirements and Outokumpu Code of Conduct. Suppliers and subcontractors must strictly condemn and prohibit the use of all forms of forced and compulsory labor and slavery, including child labor and human trafficking.

Over the years, we have established long-standing relationships with many of our suppliers, and we make our requirements and expectations of responsible and ethical business behavior clear in our Supplier Requirements. They are part of our contracts and publicly available on our website [Sustainable supply chain | Outokumpu](#).

In 2020, supplier performance evaluation of general procurement was conducted for 103 of Outokumpu's key suppliers covering almost 60% of key suppliers. As a result, improvement opportunities and improvement requirements were identified and communicated to the suppliers. The supplier assessment is based on Outokumpu's supplier performance assessment questionnaire and focused to evaluate suppliers' social and environmental responsibility, safety and quality management, see more information on our website: [Sustainable supply chain | Outokumpu](#).

To date we have not been made aware of any human trafficking or modern slavery activities within our supply chain, but if any concerns are highlighted to us, we will act immediately in accordance with our legal and ethical obligations. Finnwatch, a Finnish NGO, published in



February 2021 a report on Outokumpu's supply chain in Brazil on suspicion of environmental pollution affecting local indigenous community. Outokumpu recognizes the report and is further investigating the case together with a third party. Outokumpu provides a communication channel, SpeakUp, which is an externally operated channel enabling Outokumpu employees and external stakeholders to report breaches of Outokumpu Code of Conduct and other misconduct. This can be done confidentially, 24/7 via a secure website. We are committed to a strict non-retaliation policy and do not tolerate retaliation against anyone who has reported a potential violation in good faith.

As part of our initiative to identify and mitigate raw material supplier risk, we commit to responsible sourcing and we are implementing due diligence on the basis of the OECD Due Diligence Guidelines for Responsible Supply Chain. In 2020, the top 20 raw material suppliers covering 85% of the total direct material spending were screened with regards to the environmental, social, and governance (ESG) risks based on their countries of origin. The ESG country risk assessment was based on the following seven criteria: regulatory quality, Worldwide Governance indicators, Environmental Performance Index, conflict minerals, child labor, and forced labor. Six suppliers out of this raw material supplier group were located in countries with ESG risks. Those suppliers were requested for a self-assessment and all of the requested companies replied. Analysis of the self-assessments showed that no ESG risk was taken up in the answers. During 2020, only one site was audited due to travel restrictions, but 23 raw material suppliers were assessed under the ESG criteria resulting in some development discussions and tracking procedures.

The company regularly trains employees on the Code of Conduct, anti-corruption and other ethics and compliance topics.

Liam Bates
President Long Products

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