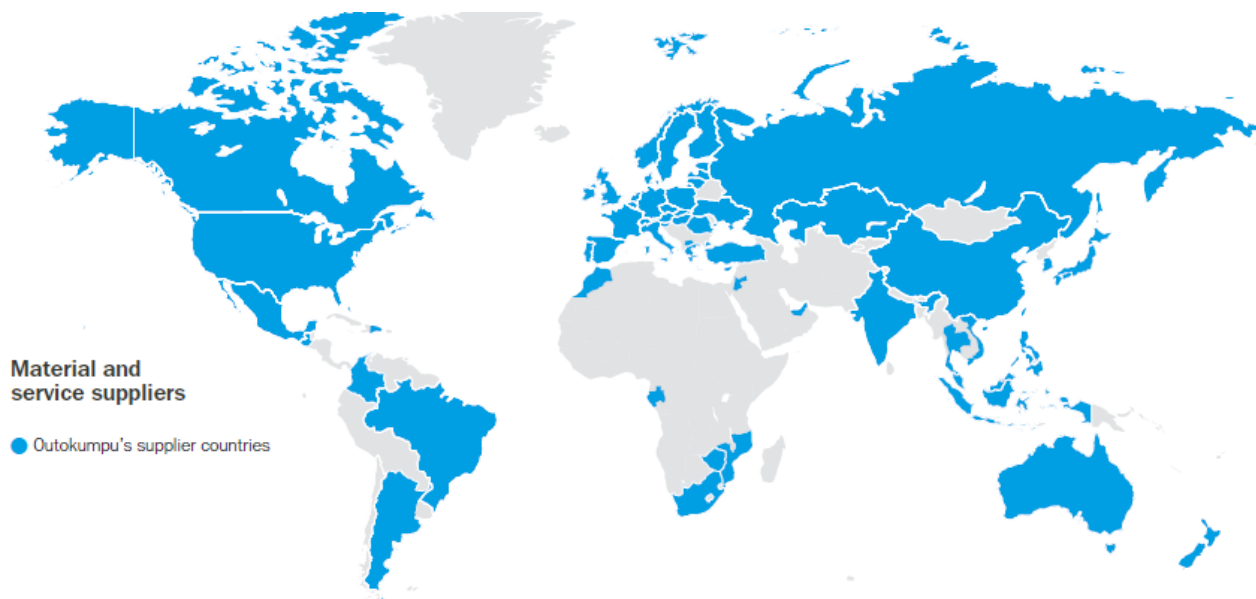




MODERN SLAVERY STATEMENT

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. In our significant production units, around 50% of the spend was made on local suppliers. Purchasing is centralized and separated into general procurement and procurement of raw materials, including semi-finished goods such as scrap, metals and alloys. 2021 was a year of acceleration for Outokumpu's sustainable sourcing practices. During spring, Outokumpu's Code of Conduct and the Supplier Requirements were updated, adding important sustainability elements and requirements for our suppliers. 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 complies with international, national and local laws and regulations. Outokumpu has revised its Code of Conduct and Supplier requirements, incorporating the 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, Human Rights Policy, our Corporate Responsibility Policy, Know Your Business Partner Instruction and other company policies and guidelines.

Our Human Rights Policy reflects our commitment to protect and respect human rights. We comply with all national laws and respect international human rights principles, including the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the European Convention on Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We are committed to the United Nations Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises and to the United Nations Global Compact as signatories to the United Nations Global Compact. We are committed to ensuring that modern slavery, forced and child labor and human trafficking play no part in our supply chain or in any part of our business.

We report on human rights following the UNGP reporting framework and the report is available on our webpage under www.outokumpu.com/sustainability/people-and-society/impact-on-society-and-human-rights.

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](#).

Summary of actions in sustainable raw material sourcing taken in 2021 are

Commitment to the UNGP

- Commitment to the United Nations' Guiding Principles of Business and Human rights (UNGP)
- Policy review to reflect this commitment
- Renewed Code of Conduct and Supplier Requirements with emphasis on human rights
- All personnel trained on the renewed Code of Conduct

Human rights / UNGP implementation

- Human rights risk assessment supported by a third party in accordance with the UNGP completed
- Capacity building on human rights in procurement
- Engagement of external experts for assessing suppliers' human rights impacts
- Identification of high-risk suppliers for on-site assessment program with external experts

Supplier requirements and onboarding

- Renewed Supplier Requirements with emphasis on human rights
- Amendment to the Supplier Requirements for raw material suppliers
- Integration of sustainability into our supplier evaluation
- Review of suppliers' onboarding process and intensified human rights due diligence

Supplier monitoring

- Increased resources in supplier sustainability
- Development of incident management process
- Engagement of sustainability platform EcoVadis to assess suppliers
- Supply chain mapping extended to beyond our direct suppliers
- Collection of supplier-specific CO2 emission intensities for selected raw materials started
- Three on site-visits after the ease of travel restrictions
- Preparation for next human rights impact assessment including site visit in Guatemala

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.

A Finnish NGO, Finnwatch, reported on suspicion of environmental pollution affecting local indigenous community with our ferronickel supplier, the Brazilian mining company Vale, in February 2021. An external partner conducted an independent impact assessment into Vale's Onça Puma mine in Brazil. This assessment was completed during 2021 and more information can be found on our webpage under www.outokumpu.com/sustainability/people-and-society/sustainable-supply-chain. We also developed and described a process for ESG incidents, to make sure that reported cases are handled with appropriate attention and actions.

We have enhanced our entire supplier monitoring. We have reviewed our Supplier Requirements and set a stronger focus on social responsibility and human rights, including the UN Guiding Principles on Business and Human Rights. We integrated sustainability as a criterion in our supplier evaluation and we started to map our supply chain beyond our direct contract partners. Outokumpu has now partnered with supplier sustainability platform EcoVadis to evaluate the sustainability performance of our raw material suppliers on a regular basis. The results of the ratings are considered in our supplier scorecards, together with procurement performance, quality, logistics and technology. They are also an input to our on-site audit planning. 19 suppliers

had valid scorecards in 2021, with an average rating score of 51 (scale 1–100), covering 33% of the spend. The suppliers not yet assessed were prioritized for assessment in 2022 using a risk- and spend-based approach.

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.

Outokumpu had around 180 raw material suppliers in 52 countries. Onboarding and monitoring of raw material suppliers follows a risk-based approach. The countries in which our suppliers operate are mapped against country-based risk indices, against the countries listed in the Dodd Frank Act Section 1502, as well as conflict-affected and high-risk areas (CAHRAs) as published by the European Union. 100% of our raw material suppliers were assessed with this risk-based approach. In 2021, 21 of Outokumpu's raw materials suppliers operated in countries with an increased risk, covering 22% of the total spend on raw materials.

Further steps are for example to finalize the review of our onboarding process and put a higher emphasis on human rights due diligence. We have also started a human rights impact assessment program for suppliers in high-risk countries together with the same independent expert that supported us with the investigation in Brazil. We have for example visited one supplier in Guatemala in 2022, where we also investigated the impacts of the company on indigenous communities and other external stakeholders. New order from Guatemala were stopped immediately and after the assessment was finalized purchasing remains suspended. We are committed to engaging and working with the company on improving the situation for the local population and their welfare and safety.

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



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