



Supplier Code of Conduct

All suppliers and subcontractors are expected to comply with Outokumpu's Supplier Code of Conduct.

Purpose and applicability

Purpose

Outokumpu is the global leader in sustainably produced stainless steel. We are conducting business in an ethical, legal, and socially responsible manner.

We recognize our place in the global community and our role in keeping our environment clean, safe, and secure. As business engagements are tightly interconnected, standing by and fulfilling our commitments also means extending our beliefs and principles through our supply chain. Therefore, we have established this Supplier Code of Conduct which stipulates our expectations how all our suppliers should behave.

Complying with our Supplier Code of Conduct is considered as a minimum requirement for business engagement with any of our business units. It provides a firm foundation for a long and lasting business partnership.

Our expectations, set up in this Supplier Code of Conduct, are further detailed in our [Supplier Requirements](#).

Applicability

This Outokumpu Supplier Code of Conduct is applicable to all suppliers that are delivering materials, products and/or services to any Outokumpu legal entity, regardless their place (direct suppliers or further upstream) in the supply chain. We expect our direct suppliers to ensure that their suppliers comply with this Supplier Code of Conduct as well.



Main principles

Outokumpu's suppliers are expected to conduct business with high integrity and follow the same key ethical principles as we do.

Safe and healthy workplace

A safe, healthy and positive workplace is a source of strength for all employees, and brings benefits to families, friends, and colleagues as well. At Outokumpu, safety takes priority over all other activities and each one of us is responsible not only for personal safety and well-being at work but also for that of colleagues and other stakeholders.

Outokumpu expects the Supplier to

- comply with all relevant legal occupational health and safety requirements,
- comply with Outokumpu's occupational health and safety requirements when entering Outokumpu's premises,
- promote well-being at the workplace whilst aiming to lessen absences,
- manage health & safety related risks and work continuously on improvements,
- execute consistent actions to promote the development of occupational health and safety systems and processes, employee ownership and consultation, commitment from leadership and overall occupational health and safety awareness,

- strive to build a positive safety culture where everyone is encouraged to report observations or opportunities for improvement,
- define, categorize, and report all hazards, near misses, accidents, and occupational illnesses, so that appropriate measures can be taken to minimize their recurrence,
- identify and assess potential emergency situations in the workplace, and to develop, implement, train, and test plans and response procedures for emergency situations, including but not limited to fires, natural disasters, pandemics, and severe epidemics,
- have recovery plans to minimize harm to life and work environment and ensure business continuity.





Sustainable future

Outokumpu wants to safeguard conditions for life and nature with its biodiversity for future generations as well. Outokumpu's products are sustainable, improving environmental sustainability through efficient life cycles and by being fully recyclable. Outokumpu strives in all operations for sustainable economic, social, and ecological development. Outokumpu takes environmental aspects including climate impacts into consideration in making business decisions and supports international cooperation to reduce emissions and enhance global environmental and climate protection throughout the whole value chain.

Outokumpu expects the Supplier to

- be committed to responsible production, aim to minimize the use of resources, and use recycled materials where possible,
- reduce negative impacts of its operations on the environment, especially on the climate and on biodiversity,
- identify and understand the potential environmental impacts of their production of goods and/or services and implement mitigation and remediation actions,
- continuously reduce the use of energy and water as much as possible, and choose clean and renewable energy sources where available,
- minimize waste and emissions to the air, water, and land in their operations,
- comply with all applicable environmental laws, rules, and regulations, including proper handling of all potentially hazardous or regulated materials,
- obtain, maintain, and keep any required environmental permits, approvals, and registrations and follow any given operational and reporting requirements.

Human rights and dignity

Outokumpu fully honors internationally recognized human rights, promotes diversity, and condemns discrimination and intolerance of all kinds. Everyone shall be treated equally, fairly, and with dignity, irrespective of such characteristics as ethnic origin, nationality, religion, political views, gender, sexual orientation, disability, or age. Outokumpu complies with international labor treaties, and condemns all forms of forced labor or use of child labor. There is freedom of association at Outokumpu.

We are committed to the United Nations Guiding Principles on Business and Human Rights and this is further detailed in our [Human Rights Policy](#).

Outokumpu expects the Supplier to

- respect and protect internationally recognized human rights,
- respect and protect the rights of children,

- comply with international labor treaties and condemn all forms of modern slavery, forced labor, and the use of child labor,
- respect and promote the right to environment, indigenous people's rights, and rights related to minorities,
- foster equal opportunities and diversity and to ensure that employees receive equal pay for work of equal value,
- not tolerate discrimination against any employee on the grounds of their racial or ethnic background, age, gender, disabilities, sexual orientation, religious beliefs, family status, social origins, political opinions, union membership, or other such characteristics,
- not tolerate any type of discriminating, sexually harassing, abusive, offensive, or other type of harassing behavior. This includes all forms of such behavior, including physical, verbal, and written acts in any form or channel,

- take all necessary actions to keep their workforce and surrounding communities safe and healthy,
- ensure that working hours, vacation times, wages, and other working conditions are consistent with applicable local laws and international standards,
- ensure freedom of association. Employees shall have the right to organize themselves, join associations, and bargain with the company collectively,
- respect the rights and interests of local communities and avoid and minimize adverse impacts,
- contribute to the community well-being.

In addition to other possible actions that Outokumpu may undertake, if the Supplier causes or contributes to human rights violations of any kind, the Supplier is expected to cease those violations immediately and offer remedy to the affected people. If necessary, the Supplier is expected to develop and implement a corrective action plan.



Good corporate citizenship

Outokumpu recognizes its corporate responsibility towards the nations and communities it operates in and the entire world. As a good corporate citizen, Outokumpu participates in the lives of its communities, above all by contributing to the economic well-being through its business operations. Outokumpu complies with applicable laws and regulations of the countries it operates in as well as with agreements and commitments it has made. Outokumpu condemns corruption and bribery and complies strictly with competition legislation and applicable sanctions regulations.

Outokumpu expects that all suppliers comply with all applicable laws and regulations as well as adhere to similar ethical standards as Outokumpu, especially as outlined below.

Anti-corruption obligation

Offering, promising, authorizing, giving, or accepting, directly or indirectly, any payments or anything of value to improperly influence a business decision or to secure special treatment is strictly prohibited. Facilitation payments are also prohibited.

Gifts and hospitality

Any gifts or hospitality offered must be given in a legitimate business context and be reasonable, proportionate, and modest in economic value. The Supplier shall never offer gifts of cash or cash equivalents (such as gift cards) or gifts that intend to make the recipient feel that the giver expects something in return to Outokumpu or on behalf of Outokumpu.

Conflicts of interest

The Supplier must act in an open and transparent manner and avoid and mitigate situations which create or have an appearance of a conflict of interest. The Supplier must notify Outokumpu of any actual or potential conflict of interest as soon as the Supplier identifies them. Once a potential or actual conflict of interest is identified, the

Supplier should work with their main Outokumpu contact to agree how to best manage such conflict.

Competition law

The Supplier is strictly obligated to obey and adhere to relevant competition law legislation in all its actions. The Supplier is expected to take all necessary actions and training measures to ensure sufficient knowledge about, and strict adherence to, competition law compliance, including the rules regarding information exchange.

Anti-money laundering

The Supplier shall comply with anti-money laundering obligations and aim to ensure that it will not put into circulation any funds or other assets making them appear legal when they in fact originate directly or indirectly from criminal offenses, such as fraud, tax evasion, human trafficking, or bribery.

Terrorist financing and conflict contribution

The Supplier shall not conduct business with entities that have connections with terrorist organizations or organized crime and the Supplier shall avoid contributing to conflict through its sourcing practices.

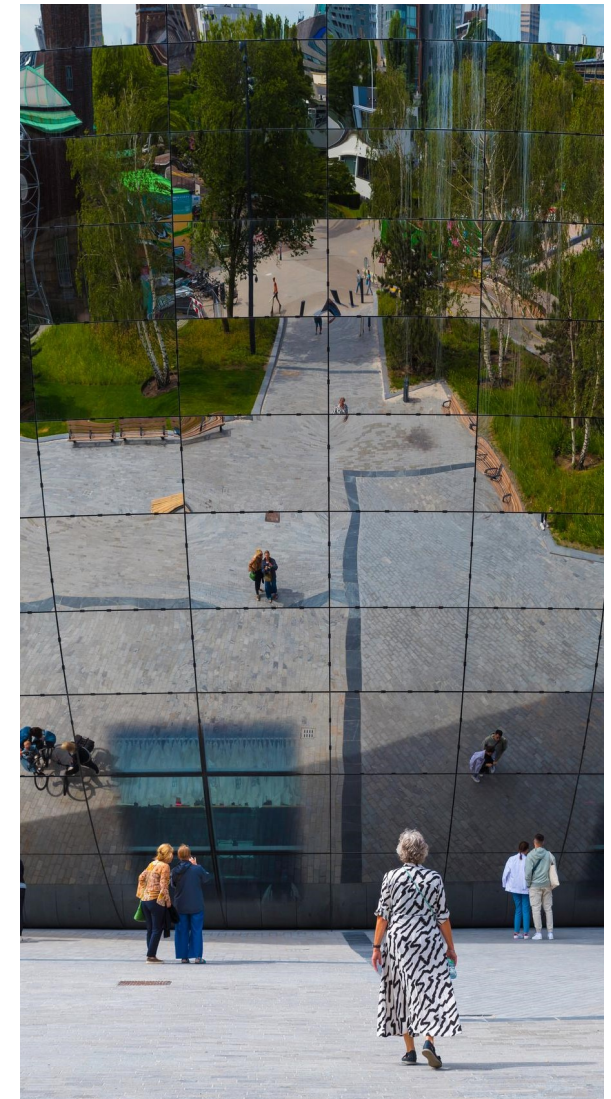
Trade sanctions

The Supplier shall not buy from or supply products or materials to any countries, territories, individuals, or entities in breach of any applicable sanctions, export restrictions and other similar restrictive measures, including but not limited to those issued by the United Nations, European Union, United States, and United Kingdom. The Supplier shall have a risk-based due diligence approach, which considers and verifies the basic facts of business partners, for instance the company's type, business nature, domicile, and origin country of purchases.

Accuracy of information and data protection

The Supplier shall issue accurate and transparent financial and other information about their business operations. The Supplier shall protect entrusted confidential and sensitive information with due care and ensure the cyber security of its operations by understanding risks and implementing sufficient controls. The Supplier shall commit to the

principles of good data protection and comply with applicable data protection laws and regulations. The Supplier shall respect the privacy of personal data of employees and all other stakeholders and ensure that personal data is collected and processed only to the extent necessary for predetermined and legitimate purposes.



Compliance and reporting of concerns

Compliance with this Supplier Code of Conduct

The Supplier is expected to implement systems and controls that help them comply with all applicable laws and regulations and the principles in this Supplier Code of Conduct in proportion to the size, complexity and risks related to the Supplier's business. Appropriate controls may include policies, training, monitoring, and auditing mechanisms.

The Supplier is expected to co-operate in a transparent manner with Outokumpu; documenting compliance, providing information to Outokumpu on request, and if considered necessary by Outokumpu granting Outokumpu or a third party authorized by Outokumpu the possibility to conduct audits in their facilities. The Supplier must also evaluate and monitor their own supply chain and provide proof of their practices if requested by Outokumpu.

Suppliers who are not in compliance with this Supplier Code of Conduct must promptly implement any necessary corrective and/or preventative actions, as agreed with Outokumpu, or they may be terminated and/or precluded from consideration of future business with Outokumpu.

Reporting of concerns

The Supplier shall ensure that its employees and stakeholders have an opportunity to raise concerns through appropriate channels. Supplier shall report any actual or suspected misconduct or unethical behavior related to the business relationship with Outokumpu without delay. Such report can be made confidentially through [Outokumpu's SpeakUp channel](#). Outokumpu does not tolerate retaliation against any individual who reports a concern in good faith.

