



## CODE OF CONDUCT

### **1. BUSINESS PRACTICES**

#### **Corruption, bribery and improper business conduct**

Euro Alloys shall not engage or be complicit in, or encourage any activity, practice or conduct that would be an offence under, or breach of, any applicable laws relating to corruption and bribery.

Euro Alloys shall not, in order to obtain or retain business or other advantage in the conduct of business, offer, promise or give anything of value or an undue advantage to a public official or to any third party to influence such person to act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or indirectly.

Euro Alloys shall not initiate or encourage facilitation payments whether the payment is made directly or indirectly.

Euro Alloys shall not request, accept or receive anything of value or an undue advantage that may influence their decisions, nor take part in or seek to influence any decision where there are related circumstances, factors or relationships (business, personal, economic or otherwise) that could give rise to an actual or perceived conflict of interest.

Euro Alloys shall not offer, promise, give, request or accept gifts, favors or hospitality which are more than modest, both with respect to value and frequency, or are inappropriate with respect to time and place. Euro Alloys shall not offer, give, request or accept any gifts, favors or hospitality in connection with tender or negotiation/award processes.

#### **Competition**

Euro Alloys shall not enter into, seek to enter into or otherwise engage in any form of agreement, arrangement or activity that would be a breach of applicable competition laws and regulations.

#### **Money laundering**

Euro Alloys shall be firmly opposed to all forms of money laundering and shall take steps to prevent its financial transactions from being used by others to launder money or finance terror.

#### **Trade sanctions**

Euro Alloys shall comply with relevant trade sanctions

#### **Data Privacy**

Euro Alloys shall comply with applicable data protection legislation.

### **2. HUMAN RIGHTS AND WORKING CONDITIONS**

#### **Human rights**

Euro Alloys shall respect and support individual and collective human rights affected by its operations. Euro Alloys shall take appropriate action to assess, prevent and remedy potential adverse impacts on human rights in a manner that is consistent with international instruments on human rights.

#### **Working Hours**

Euro Alloys shall comply with applicable laws, regulations and national industry standards on working time, including overtime working hours, public holidays and paid vacation.

#### **Child labor**

Euro Alloys shall not employ children below the age of 15 or any higher minimum age for employment according to applicable laws. Young workers below the age of 18 shall not undertake any hazardous work.



## **Forced labor**

Euro Alloys shall not employ personnel against their will or require personnel to lodge identity papers or deposits (financial incl. recruitment fee or otherwise) as a condition of their employment. All personnel shall be free to leave their employment after giving reasonable notice.

## **Freedom of association and right to collective bargaining**

Euro Alloys' personnel shall have the right to freedom of peaceful assembly and association, and no one may be compelled to belong to an association. Euro Alloys shall respect the personnel's right to participate in unions and being represented in collective bargaining agreements in line with applicable laws and ILO Conventions. In countries where applicable law restricts these rights, alternative means of association for personnel shall be supported.

## **Employment conditions**

Euro Alloys shall ensure that their personnel are provided with a written description of terms and conditions of employment in a language they understand.

Wages and benefits paid for a standard working week shall as a minimum meet national legal or industry standards, whichever is higher. Wages should be enough to cover basic needs and provide some discretionary income.

Payments are to be made timely, in legal tender and fully documented.

## **Non-discrimination and equal opportunities**

Euro Alloys shall not support any form of discrimination or harassment including, but not limited to race, color, gender, sexual orientation, language, religion, political or other opinion, national or social origin. Euro Alloys shall promote equality of opportunity or treatment in employment and occupation.

All personnel shall be treated with respect and dignity, and Euro Alloys shall refuse to tolerate any unacceptable or degrading treatment, including mental cruelty, sexual harassment or discrimination gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative.

## **Local communities**

Where relevant for Euro Alloys' operations, the rights and integrity of local communities, indigenous people or other traditional groups shall always be respected. Euro Alloys shall respect rights such as culture, customs and heritage of local communities.

Euro Alloys shall minimize resettlement of people by considering feasible project alternatives.

For work that may have significant impact on land areas inhabited or used by indigenous people or other traditional groups, Euro Alloys shall consult and cooperate with the people concerned in line with ILO convention 169.

## **Security forces**

Euro Alloys shall operate in line with the Voluntary Principles on Security and Human Rights when involved with public or private security providers.

## **Conflict minerals**

To the extent applicable to Euro Alloys' operations, there shall be a written policy and procedure in place to avoid knowingly acquiring conflict minerals or unsustainable mined minerals produced at high environmental and social costs.

## **Whistleblowing routine**

Euro Alloys shall ensure routines for personnel to raise concerns or request information related to their business operations.



### **3. HEALTH AND SAFETY**

Euro Alloys shall secure a healthy and safe working environment for all its personnel and follow prevailing regulatory standards and industry norms to minimize health and safety risks. This shall include compliance to applicable laws and regulations, international standards and the ILO conventions on Occupational Health and Safety.

Euro Alloys shall ensure that its personnel understand the hazards and safe practises for their work, and authority to refuse or stop unsafe work. Whenever necessary personnel are to be provided with, and instructed to use, appropriate personal protective equipment.

Euro Alloys shall provide adequate and regular training to ensure that personnel are adequately educated on health and safety issues.

Where Euro Alloys provide accommodation for their personnel, it shall be clean, safe and meet the basic needs of the personnel, and, where appropriate, for their families.

### **4. ENVIRONMENT AND CLIMATE**

Euro Alloys shall ensure that its operations are compliant with the environmental laws, regulations, legal agreements and permits relevant to the geographic locations of its facilities.

Euro Alloys shall strive to minimize the adverse environmental and climate impacts of its activities, products and services. To the extent applicable to its operations, Euro alloys shall demonstrate an established methodology for identifying and mitigating its material environmental risks.

Euro Alloys shall seek to implement environmentally friendly technologies and processes in its activities to ensure the sustainable use of natural resources, safe handling of waste and chemicals, and reduced emissions to air and water.

#### **REFERENCES:**

- Aluminium Stewardship Initiative (ASI) Performance Standard
- Convention on the Rights of the Child
- International Council on Mining & Metal (ICMM) 10 principles
- ILO core labor conventions
- Indigenous and Tribal Peoples Convention No. 169
- OECD Guidelines for Multinational Enterprises
- UN Declaration on the Rights of Indigenous People
- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Voluntary Principles on Security and Human Rights

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