



BRIDGNORTH ALUMINIUM

SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct objective is to ensure that our suppliers, contractors, consultants and business associates (“Business Partners”) share and promote our companies’ fundamental values in ethics and sustainability principles. Bridgnorth Aluminium Ltd (BAL) will comply with all the principles in this Supplier Code of Conduct and will correspondingly promote these principles within their own supply chain.

Business Partners are expected to agree to an assessment of their performance on sustainability issues such as their environmental, social and ethical performance - either performed by BAL or by third parties associated with us. The participation of Business Partners in the sustainability assessment is considered essential for the business relation with BAL, as sound sustainability practices are expected from all of our Business Partners.

1. Business ethics and anti-corruption

Compliance

Business Partners are required to comply with all applicable local laws and regulations, including those of the countries in which they operate. Business Partners should have a formal system to establish rules and indicators, keep records and trigger corrective actions, in case of legal breaches or any violations of this Code, endorsed by Senior Management and upon request of BAL, be able to disclose information and performance indicators on business activities, labour, health and safety, and environmental practices.

Business integrity

Business Partners are required to adhere to the highest standard of ethical conduct in every aspect of their businesses, including relationships, practices, sourcing, and operations, as well as not engaging in any form of corrupt practices, including but not limited to extortion, fraud, bribery and money laundering.

Improper actions

Business Partners are required to avoid behaviour or actions that would be an offense under any applicable law relating to corruption and bribery.

Fair business and competition

Business Partners are required to conduct their business activities in accordance with all applicable antitrust, competition and fair trade practice laws and regulations. They are also required to respect all applicable economic sanctions, trade laws and restrictions as imposed by the UK, the UN or other national and supranational bodies or governments including but not limited to, extortion, fraud, counterfeit, bribery and money laundering. Business Partners will disclose to BAL all available information about possible conflicts of interest.

No improper advantage

Business Partners must not offer or accept bribes or other means of obtaining undue or improper advantage.

2. Labour and human rights

Equal opportunities

Business Partners are expected to provide equality of opportunity and treatment and not to apply any form of discrimination in hiring and employment practices on grounds of race, colour, religion, gender, sexual orientation, age, physical ability, health condition, political opinion, nationality, social or ethnic origin, union membership or marital status. Business Partners are expected to respect local communities related to their operations, their respective land, forest and water rights and any related culture, religion, and indigenous rights. Business Partners should promote a healthy and safe living environment, support local job creating and sourcing, stand against forced evictions and avoid any health and safety concerns, including air pollution, noise and other nuisances.

Child and forced labour

Business Partners are required to prohibit child labour. Business Partners are required to employ only workers who meet the respective applicable minimum legal age requirement in the country of operation.

Business Partners are required to reject any form of forced or compulsory labour.

Harassment

Business Partners are required to treat employees with dignity, equality and respect. And not with harassment or discrimination.

Safe working conditions

Business Partners will ensure a healthy, safe and secure working environment for their employees. Business Partners are required to maintain a system for all personnel to report health and safety incidents, as well as a system to investigate, track, and manage such reports. Business partners are required to implement where necessary corrective action plans to mitigate risks, provide necessary medical treatment, along with facilitating workers’ return to work.

Working hours, wages and benefits

Business Partners shall follow applicable law with respect to working hours, wages and benefits. Overtime shall be compensated at the prevailing overtime rates.

Freedom of association and collective bargaining

Business Partners are expected to recognize and respect the right of employees to join or not join labour unions, associations or any other lawful organisation, and to comply with all relevant applicable local and national laws.

Conflict minerals

Business Partners are expected to take measures to ensure that no minerals/raw materials are being used (manufactured or procured) which are considered conflict raw materials. Upon request, Business Partners shall provide country of origin information for the listed minerals.

Any direct or indirect support to public or private security forces who operate illegally in mining, transportation or any other related upstream action is reason for immediate suspension of business relationships.

3. Environmental protection

Licenses and permissions

Business Partners are required to comply with all required environmental permits, approvals and registrations and to follow the operational and reporting requirements of such permits.

Pollution prevention, resource consumption and waste management

Business Partners are expected to maintain continuous improvements with respect to environmental emissions as well as energy and resource management. Business Partners shall implement and demonstrate sound measures to prevent pollution and minimise generation of solid waste, wastewater, and air emissions.

Greenhouse Gas Emissions and Energy Consumption

Business Partners should look for cost effective methods to improve energy efficiency and to minimise their energy consumption, including greenhouse gas emissions. Business Partners are expected to promote decarbonisation initiatives, reducing their direct and indirect Co2 emissions, through the use of renewable sources of energy and utilisation of secondary materials. BAL expects transparency in terms of their own emissions as well as those of their suppliers and encouraged to set reduction targets.

Product content restrictions

Business Partners are required to adhere to all applicable laws and regulations regarding prohibition or restriction of specific substances, including labelling for recycling and disposal, e.g. REACH regulation, RoHS restrictions, CE marking etc.

Biodiversity protection

Business Partners are expected to protect and support actions of preservation of natural ecosystems, forests and animals.

4. Personal data protection

Business Partners are required to respect the personal data protection and undertake the appropriate measures according to the provisions of the General Data Protection Regulation 679/2016 of the UK and the national implementation law 4624/2019. Aiming the attunement with the international standards and best practices, business Partners should establish strict procedures for the protection of personal data throughout its spectrum of activities.

5. Integrity Hotline

Business Partners have the right and obligation to draw the organisations and BAL's attention to circumstances indicating prospective illegal behaviour. Notifications and complaints may be made anonymously, in accordance with the relevant Whistleblowing mechanism. Reporting individuals will not be subject to reprisals or retaliation of any kind.

Every report received through the Integrity Hotline at BAL's website is to be investigated thoroughly and discretely, by specially appointed senior executives who consult directly when a critical indication appears. All cases will be assessed in an independent and transparent manner, securing impartiality.

Business Partners are also encouraged to provide all stakeholders with access to mechanism(s) to raise concerns relating to violations (or suspicion of) on any parts of the Code of Conduct. All employees that report a concern should be protected from any form of retaliation.

Supplier acknowledgement

I hereby acknowledge that I am an authorised representative for the company. I have read and understood the policies and principles described in this Code of Conduct, and our company is in full compliance with it



Company: _____

Name: _____

Job Title: _____

Signature: _____

Date: _____

Company Stamp:

Validity of the Code of Conduct
BAL reserves the right to reasonably change the requirements of this Supplier Code of Conduct due to changes to the Company's Code of Conduct and Business Ethics. In such an event BAL will inform its Suppliers and expects them to accept those reasonable changes.