

## Alleima Statement on Responsible Sourcing of Minerals and Metals

At Alleima we put ethical and sustainable practices first. Our long-term sustainability targets reflect our commitment to be at the forefront of sustainability and to advance industries through sustainable offerings and operations – and this includes all stages of our supply and production chain.

Alleima recognizes that we have the responsibility to respect human rights and not contribute to conflict. We recognize the risks of significant adverse impacts, which may be associated with extracting, trading, handling, exporting, and procuring minerals from conflict-affected and high-risk areas. Related risks need to be managed adequately. As such, Alleima fully supports internationally recognized industry standards and frameworks for supply chain due diligence, including those developed by the Organisation for Economic Cooperation and Development (OECD), and the United Nations Guiding Principles on Business and Human Rights.

When sourcing materials that will be included in the products we put on the market, we are committed to responsible sourcing of minerals and metals in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). To ensure conformance with the OECD Guidance, we take appropriate actions to establish and implement a supply chain due diligence management system to identify, assess and mitigate the risks associated with the extraction, trade, handling, and export of minerals as outlined in Annex II of the OECD Guidance, specifically, risks related to:

- Serious human rights abuses:
  - Any forms of torture, cruel, inhuman and degrading treatment;
  - Any forms of forced or compulsory labor;
  - The worst forms of child labor;
  - Other gross human rights violations such as widespread sexual violence;
  - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Conflict:
  - Direct or indirect support to non-state armed groups who illegally control mines, transportation routes and points where minerals are traded; who illegally tax or extort money or minerals; or who illegally tax or extort intermediaries, export companies or international traders.
  - Direct or indirect support to public or private security forces who illegally control mines, transportation routes and upstream actors; illegally tax or extort money or minerals; or illegally tax or extort intermediaries, export companies or international traders.

- Financial crime:
  - Bribery and fraudulent misrepresentation of the origin of minerals;
  - Money laundering;
  - Non-payment of taxes, fees, and royalties due to governments.

This supply chain due diligence management system ensures a standardized and systematic approach with the objective of mitigating and reducing potential and actual adverse human rights impacts throughout our supply chains and ensuring that the sourcing practices in these supply chains conform to international good practice.

Alleima participates in industry initiatives that promote responsible sourcing of minerals including from conflict-affected and high-risk areas. Alleima is directly, and through its subsidiaries, a member of the Responsible Minerals Initiative of the Responsible Business Alliance. We support our customers in complying with the Conflict Minerals Rule under Section 1502 of the Dodd-Frank Act, and source our raw materials in line with the EU Conflict Minerals Regulation 2017/821.

Our Supplier Code of Conduct, which all our suppliers are required to conform with, includes requirements for transparent and responsible supply chains of raw materials and contains potential termination rights in case of non-compliance. To verify compliance, Alleima employs a combination of checks through supplier assessments, feedback, and collaborative efforts to ensure continuous improvements in supplier responsible sourcing performance along our supply chain.

Furthermore, we require our suppliers of raw materials and components containing tin, tantalum, tungsten, gold (3TG) or cobalt that are part of the direct supply chain of Alleima products to comply with all applicable laws concerning responsible sourcing and conflict minerals, follow the OECD Guidance and ensure traceability in their 3TG and cobalt supply chain to smelter or refiner level. For these suppliers, the following expectations apply:

- While respecting commercial confidentiality, we require our suppliers to report on their supply chain through transparency tools like Responsible Minerals Initiative's Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT).
- We require all 3TG and cobalt smelters and refiners in our supply chain to demonstrate compliance with third-party assessment programs such as the Responsible Minerals Initiative's Responsible Minerals Assurance Process. All smelters and refiners are expected to report annually on the performance of their responsible sourcing systems, as stipulated in the OECD Guidance.
- All EU based suppliers are required to comply with EU Conflict Minerals Regulation 2017/821 (if applicable).

Alleima encourages all stakeholders to report concerns, risks, and human rights violations with respect to the responsible sourcing of raw materials, through the company's whistle-blowing system: Speak Up. The system allows for the reporting of concerns about suspected breaches of Alleima Code of Conduct, Alleima Supplier Code of Conduct, other Alleima policies and applicable laws without fear of retaliation.

This statement will be reviewed regularly and updated as required.

Sandviken, May 8, 2023



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