

# TRIMET Supplier Code of Conduct

TRIMET Aluminium SE

TRIMET Aluminium SE and its subsidiaries, including TRIMET France SAS, (“TRIMET”) are committed to environmentally and socially responsible corporate governance and ethical business conduct and expect the same from its suppliers. This TRIMET Supplier Code includes the internationally recognized values and standards to which TRIMET adheres and strives in its business operations and supply chain. TRIMET expects its suppliers, contractors and consultants (hereinafter referred to as “Supplier”) to agree to and comply with this Supplier Code or to have and comply with a comparable code of conduct of their own.

## 1. Compliance with laws

The Supplier shall comply with applicable laws and regulations.

## 2. Occupational Health and Safety

The Supplier shall provide a safe and healthy working environment for its employees.

## 3. Working conditions and Human Rights

### 3.1 Prohibition of child labor

The Supplier shall not employ children below the minimum legal age of employment in the respective country. If no minimum age of employment is specified, the Supplier shall not employ any children under the age of 15. The Supplier does not employ persons under the age of 18 for hazardous work. Employees under the age of 18 shall only perform work in accordance with legal requirements.

### 3.2 Prohibition of forced labor

The Supplier does not tolerate any form of forced or compulsory labor or any form of slavery. The Supplier shall not require its employees to provide identification documents or deposits (financial or otherwise) as a condition of their employment.

### 3.3 Working Hours, Compensation and Other Benefits

The Supplier shall comply with applicable laws relating to working hours, compensation and other employment benefits under the applicable jurisdiction.

### 3.4 Protection against discrimination and harassment

The Supplier shall not tolerate discrimination or harassment of its employees. No one may be discrim-

inated against, favored or harassed on the basis of characteristics such as gender, race, skin color, religion, nationality, political or other convictions, ethnic origin, disability, age, sexual orientation or any other characteristics.

## 3.5 Freedom of Association and Right to Collective Bargaining

The Supplier recognizes the right of its employees to form employee representations and to conduct collective negotiations to regulate working conditions.

## 4. Environment and energy

### 4.1 Energy consumption and greenhouse gas emissions

The Supplier shall monitor its energy consumption and greenhouse gas emissions. It shall strive for a continuous reduction of greenhouse gas emissions. The Supplier shall evaluate the “carbon footprint” of its business activities and products. The Supplier shall find economic solutions to improve energy efficiency and minimize energy consumption. Preference shall be given to the use of renewable energy sources wherever possible.

### 4.2 Water quality and consumption

The Supplier shall monitor and reduce its water consumption wherever possible and monitor water quality. It shall endeavor to avoid any degradation of water quality.

### 4.3 Air quality

The Supplier shall monitor the air quality. It shall endeavor to avoid any degradation of air quality.

**4.4 Natural Resource Management and Waste Prevention**

The Supplier has a system in place to ensure the management of natural resources and to help prevent waste.

**4.5 Responsible chemical management**

The Supplier has a system in place to ensure responsible chemical management.

**5. Business ethics**

**5.1 Corruption, extortion and bribery**

The Supplier does not tolerate any form of corruption, extortion and bribery.

**5.2 Privacy and data protection**

The Supplier must ensure that the laws on data protection and information security are complied with.

**5.3 Fair Competition and Antitrust**

The Supplier shall comply with fair competition and business standards and respect competition rules.

**5.4 Conflicts of Interest**

A conflict of interest is any situation where an employee of the Supplier has a close relationship with an employee of TRIMET whose decisions could affect the Supplier's business. The Supplier is required to avoid conflicts of interest and the occurrence of conflicts of interest.

**5.5 Financial Responsibility (accurate records)**

The Supplier shall maintain books and records in accordance with applicable law.

**5.6 Disclosure of Information**

The Supplier shall disclose financial and non-financial information in accordance with applicable law.

**5.7 Counterfeit parts**

The Supplier shall develop processes to prevent the introduction of counterfeit parts.

**5.8 Intellectual Property**

The Supplier respects intellectual property rights.

**5.9 Export Controls and Economic Sanctions**

The Supplier shall comply with applicable import and export regulations.

**5.10 Whistleblowing system and protection against retaliation**

The Supplier's employees shall be able to communicate openly with the company management without fear of reprisals or harassment. This is especially true when employees report in good faith company practices that violate laws or internal regulations.

**6. Sustainable Sourcing**

The Supplier shall make every reasonable effort to communicate and enforce the principles of this Supplier Code to its suppliers and other subcontractors in its supply chain.

**7. Dialog**

In case of questions, an email can be sent to the following address: [compliance@trimet.de](mailto:compliance@trimet.de). Upon request, the Supplier shall provide TRIMET with information on the implementation of and compliance with the requirements of the Supplier Code. TRIMET reserves the right to verify compliance with the Supplier Code. TRIMET reserves the right to request corrective action in case of non-compliance and to terminate the cooperation if necessary.

## Confirmation

I/we hereby confirm that I/we am/are authorized to represent the company named below, that I/we have carefully read and understood the contents of the document and that the company listed below complies with the TRIMET Supplier Code.

**Supplier:**

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**D-U-N-S Number:**

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**Date and Signature:**

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**Name and Function:**

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OR

I/we hereby certify that I/we am/are authorized to represent the company named below, that I/we have carefully read and understood the contents of the document, and that the company listed below has and complies with comparable codes of conduct. The relevant documents are attached by link/URL.

**Supplier:**

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**D-U-N-S Number:**

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**Date and Signature:**

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**Name and Function:**

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**Link/URL to own code of conduct:**

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