

This Supplier Code of Conduct aims to establish general principles for FirstAlloys and its trade partners when conducting commercial activities in compliance with competition laws, civil laws, and other applicable regulations.

The FirstAlloys' Supplier Code of Conduct considers the United Nations Global Compact's ten fundamental principles, which are derived from the [Universal Declaration of Human Rights](#), the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#), the [Rio Declaration on Environment and Development](#), and the [United Nations Convention Against Corruption](#).

FirstAlloys is dedicated to ethical behaviour, protecting human rights, and maintaining a responsible supply chain. This involves identifying, preventing, mitigating, and accounting for adverse impacts on human rights, the environment, or governance in our operations and supply chain. We are known for delivering top-quality products from numerous business partners worldwide. As a supplier and business partner of FirstAlloys, you must adhere to the standards outlined in our Supplier Code of Conduct within your business. You should expect the same from your business partners if you haven't already done so. This Supplier Code of Conduct applies to all our business partners, regardless of their location. If local laws, regulations, or standards are stricter than the principles and requirements set out here, we expect you to comply with the more stringent requirements.

This Code of Business Conduct is based on the following five principles:

## **1 Business Integrity**

## **2 Human Rights Commitment**

## **3 Environmental Protection and Sustainability**

## **4 Health & Safety**

## **5 Commitment and reporting**

### **1 Business Integrity**

#### **1.1 Compliance with legal provisions**

At FirstAlloys, we consider compliance with laws and legal provisions crucial for responsible business conduct and the foundation of all our activities. In addition to following the principles outlined in this Supplier Code of Conduct, we expect everyone to respect and adhere to all applicable laws, regulations, and industry standards. If there is a conflict between these laws, rules, and standards, as well as the principles set out here and on the other, we require you to inform us so that we can work together to determine an appropriate joint approach to the issue.

#### **1.2 Promoting fair competition**

FirstAlloys' policy is to promote fair, open, and unrestricted competition. FirstAlloys complies with all applicable domestic and foreign antitrust legislation and laws against unfair competition. Our business partners must comply with all relevant competition and antitrust laws and avoid engaging in anticompetitive practices. FirstAlloys rejects practices that constitute unfair competition and will not tolerate any infringements.

#### **1.3 Avoiding bribery and corruption**

FirstAlloys is committed to conducting honest and fair business dealings free from bribery, corruption, extortion, or fraud. We do not tolerate offering, granting, or accepting any gift, loan, fee, reward, or advantage to or from another person as an incentive to engage in dishonest, illegal, or untrustworthy behaviour. As a business partner of FirstAlloys, you are expected to conduct business fairly, transparently, and legally and refrain from engaging in bribery. Courtesies extended to FirstAlloys' employees or relatives must be reasonable in scope, value, and frequency and align with ordinary local business customs.

### 1.4 Political donations, charitable contributions, and sponsorships

FirstAlloys does not support political organisations, and we never use charitable or commercial sponsorships to influence decision-makers improperly. Similarly, we expect that our business partners will not provide political support, make charitable donations, or offer sponsorships to gain an unfair advantage or influence decision-making in any transaction with FirstAlloys.

### 1.5 Avoiding conflicts of interest

FirstAlloys conducts its business objectively. We expect our business partners and suppliers to be transparent in their business decisions and transactions with us to prevent potential conflicts of interest. You must disclose to FirstAlloys if any FirstAlloys employee is directly involved in our business with you or if a close relative of such an employee has or potentially has a significant economic interest in your business. If such conflicts arise, they must be resolved following the law and FirstAlloys' policies and will be dealt with openly and transparently.

### 1.6 Preventing money laundering

FirstAlloys does not engage in or accept any involvement with money laundering. As our business partner and supplier, you must have proper internal control systems in place to monitor your business for any indications of money laundering activities and thereby minimise the risk of being involved in such practices.

### 1.7 International trade sanctions and export control

FirstAlloys complies with international sanctions and export control restrictions, including those imposed by the USA or EU occasionally. We take the necessary measures to ensure compliance with these regulations. Our business partners and suppliers must also comply with international sanctions and export controls.

### 1.8 Company assets, intellectual property, and confidential information

FirstAlloys protects company assets, intellectual property rights, and confidential information. We expect all individuals to exercise due care and attention and refrain from disclosing confidential information about FirstAlloys to unauthorised third parties. Additionally, we expect everyone to safeguard FirstAlloys' company assets and comply with all relevant laws regarding intellectual property rights. As a business partner of FirstAlloys, you should never knowingly infringe on FirstAlloys' intellectual property or that of others.

The knowledge and information obtained while working with FirstAlloys are crucial for its commercial success. This encompasses, but is not limited to, information about business operations, financial results, personnel, or any other non-public information, irrespective of whether it is labelled as 'confidential'. This also pertains to confidential information of third parties and employees, protected by relevant data privacy laws and regulations.

### 1.9 Maintaining proper accounting practices and company records

FirstAlloys must keep precise and comprehensive books and accounting records to prepare financial statements that adhere to generally accepted accounting principles. Maintaining full accountability for the company's assets and liabilities is essential. As our business partner and supplier, you must comply with all pertinent laws, regulations, reporting, and accounting guidelines regarding your business. We expect our business partners to uphold this standard and provide relevant and valid records, information, and documentation about supplies to FirstAlloys upon request.

## 2 Human rights commitment

### 2.1 Promoting equal opportunities, diversity and non-discrimination

FirstAlloys believes that diversity and inclusion are crucial to its global success. The company values the diversity of its employees and acknowledges the importance of **social responsibility**. Therefore, it is in FirstAlloys' best interests to ensure **fair working conditions and equal opportunities** for work and social welfare. FirstAlloys has a zero-tolerance policy towards discrimination based on age, gender, sexual identity, ethnic origin, skin colour, race, disability, religion, belief, nationality, social status, or any other personal characteristics.

FirstAlloys considers it a duty to treat its employees with respect and provide fair compensation, development opportunities, training, health and well-being support, equal opportunities for all employees, and due respect for employee privacy and individual dignity. The company also expects its employees to treat each other with respect. FirstAlloys expects its business partners to create an inclusive work environment where everyone is respected and to work towards **eliminating discrimination and harassment** in the workplace.

### 2.2 Respecting rights at work

FirstAlloys respects the rights of its employees at work. Our business partners and suppliers must support their employees' freedom of association and recognise their right to be members of a union or other collective bargaining group. According to local law, employees must be fairly compensated for their work and have reasonable breaks and paid holidays.

### 2.3 Rejecting forced and child labour

**FirstAlloys rejects all forms of forced and child labour.** FirstAlloys will respect the minimum legal working age of the relevant jurisdiction when employing staff. Our suppliers must ensure they do not use child labour directly or through subcontractors. FirstAlloys expects that its business partners allow their employees freedom of movement during their employment; this refers not only to all work performed involuntarily but also instances of coercion, mental and physical threat or abuse, abuse of power and deception, thereby giving rise to forced or involuntary labour (modern slavery).

## **3 Environmental Protection and Sustainability**

FirstAlloys is committed to environmental protection and takes meaningful actions to support it. We source raw materials globally, sometimes from areas with potential sustainability risks. We acknowledge our responsibility to protect the environment and the communities affected by our business operations. All FirstAlloys suppliers and business partners must consider environmental protection when developing products and services, promote recycling, and conserve materials and energy. This includes identifying areas with significant environmental impact and continuously seeking improvements, such as minimising energy and water consumption, reducing waste, and promoting recycling.

As a FirstAlloys business partner, you should minimise the environmental footprint through sustainable production, adhere to the highest environmental protection standards, and prioritise technologies with minimal climate impact. You should also be committed to using energy efficiently, reducing CO<sub>2</sub> and noise emissions, conserving resources, and responsibly managing waste and hazardous substances. FirstAlloys requires that its business partners fully respect the environment and ensure compliance with all applicable laws and regulations at the international level in the manufacturing and supplying countries.

## **4 Health and Safety**

At FirstAlloys, health and safety in our workplaces are priorities. Occupational health and safety protection are integral to all business processes and include all technical, economic, and social considerations. **FirstAlloys considers it a duty to be an employer that ensures employees' safe and healthy working conditions.** All FirstAlloys employees must comply with health and safety regulations. We expect nothing less from our suppliers and business partners. You must follow applicable safety rules and regulations, provide a safe and healthy work environment, and strive to promote an accident-free workplace. If you handle or use dangerous goods, you must ensure that all risks associated with the handling or using dangerous goods and hazardous substances are safely controlled and managed.

In particular, • safe work procedures (SWPs) specific to the handling of dangerous goods and hazardous substances must be implemented, and SWP guidelines must be available in the workplace • safety information, including Safety Data Sheets, must be readily available • appropriate training and Personal Protective Equipment must be provided to employees who may be exposed to dangerous goods and hazardous substances.

## 5 Commitment and reporting

### 5.1 Reporting of concerns (Whistleblower)

Employees, suppliers, business partners, and third parties can confidentially and anonymously report any suspected legal violations, Business Code of Conduct breaches, or other activities that could harm FirstAlloys through our email [compliance@firstalloys.com](mailto:compliance@firstalloys.com). Whistleblowers will not face any repercussions for making a report; their anonymity is guaranteed in all cases. All possible corruption, discrimination, or supply chain violation reports are thoroughly investigated.

### 5.2 Internal organisation to uphold this Code of Conduct

FirstAlloys' Business Code of Conduct applies and is mandatory for all our suppliers and business partners. Our choice to work with you as a business partner is not only based on the quality, price, and professionalism of your services or products; it is also based on your respect for our commitment to conducting business ethically, environmentally, and socially responsible, following FirstAlloys' Business Code of Conduct.

### 5.3 Assessment and audit

FirstAlloys requests that our business partners work with us openly and transparently to assess whether they comply with FirstAlloys' Business Code of Conduct. Every year, FirstAlloys' employees request further information from suppliers, logistics providers, and all other business partners through a detailed self-assessment questionnaire. In some instances, FirstAlloys employees will perform an on-site audit and, if needed, work with suppliers to introduce an improvement program based on the audit findings.

### 5.4 Non-compliance

If FirstAlloys becomes aware, through an audit or otherwise, of severe or multiple failures by a supplier or business partner to comply with our Business Code of Conduct, we expect the business partner to develop and implement an appropriate corrective action plan promptly. If the business partner continues to repeatedly or seriously breach the code, we may terminate our relationship with them or exclude them from doing further business with FirstAlloys until we are satisfied that sufficient progress has been made to remedy the breaches.

### 5.5 Legal documentation

FirstAlloys may require that suppliers and business partners agree to the addition of reasonable legally binding clauses in the contractual documents to ensure the business partner follows the principles and procedures, where relevant, set out in FirstAlloys' Business Code of Conduct.

### 5.6 Questions and Suggestions

If you have questions or suggestions about any aspect of the FirstAlloys Business Code of Conduct, please email [compliance@firstalloys.com](mailto:compliance@firstalloys.com).

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