

Third-Party Code of Conduct

Doing Business with SAFIC-ALCAN

SAFIC-ALCAN and its subsidiaries (“SAFIC-ALCAN”) are committed to conduct all of our business activities with a view to securing a sustainable and ethical business relationship in accordance with the applicable laws and standards of our activity.

SAFIC-ALCAN expects the Suppliers & Third Parties Providers (“Third-Parties”) who produce products for or provide services to Safic-Alcan to conduct business responsibly, with integrity, honesty and transparency.

SAFIC-ALCAN developed “Doing Business with Safic-Alcan” as a Third-Parties’ Code of Conduct to ensure that you are aware of SAFIC-ALCAN’s expectations when working with our employees and for your own business conduct. SAFIC-ALCAN’s Code of Conduct is available at:

<http://www.safic-alcan.com/sustainability/sustainability-governance/code-of-conduct.html>

Third-Parties are required to be acquainted with the Charter and to conform to its principles as long as they are in a business relationship with us. SAFIC-ALCAN expects from Third-Parties to ensure that their respective suppliers, subcontractors and partners do follow these same principles.

A. Human Rights

We respect the rights and dignity of all Employees. We create an inclusive global culture where everyone can do their best at work.

Third-parties must commit to uphold the Human Rights of their employees and mainly to:

- protect their fundamental freedoms.
- provide appropriate working conditions.
- eliminate discrimination in hiring, employment and compensation and prevent any form of discrimination.
- create a workplace free of harassment or any other form of abuse, including sexual harassment or offensive behaviour.
- Prevent any form of child labour or other forced labour, including human trafficking.

Third-parties shall rectify any violation of these rights.

B. Conflicts of Interests

SAFIC-ALCAN has defined expectations for its employees in its Code of Conduct to promote honest, legal and ethical conduct. We expectsThird-Parties to respect the following provisions when interacting with its employees:

1. Conflicts of interests: All SAFIC-ALCAN employees are required to be free from actual or potential conflicts of interest. A “conflict of interest” occurs when an Employee’s private interest interferes or appears to interfere with the interests of the Company. Any situation that would present a conflict of interest for an Employee would likely also present a conflict if it relates to a family member.
2. Gifts and Entertainment : SAFIC-ALCAN recognizes that the exchange of small courtesies with our business partners develops and strengthens relationships—but SAFIC-ALCAN employees never give or receive gifts or entertainment that inappropriately influences business decisions or that conflict with our values.

C. Ethics and Compliance

SAFIC-ALCAN conducts business with Third-Parties who share its commitment to comply with legal requirements and maintain high ethical standards. SAFIC-ALCAN expects its business partners to act with integrity, honesty, and transparency.

SAFIC-ALCAN expects all Third-Parties to comply with internationally recognized standards in order to advance social and environmental responsibility, including the following:

- 1) Anti-Corruption & Bribery: Corruption, bribery, extortion, and embezzlement, in any form, are strictly prohibited. Third-Parties must not pay or accept bribes or participate in other illegal inducements in business or government relationships.
- 2) Competition & Antitrust Laws: Third-parties must never engage in or support unfair or predatory business practices or any activities that would improperly restrain trade. It is also critical that Third-parties avoid any activity that could violate competition laws.
- 3) Protection of Intellectual Property: Third-parties must respect intellectual property rights; protect trade secrets and confidential information; and ensure that transfer of technology and know-how is protected from onward.

D. Health, Safety & Environment

Suppliers and Third-parties must be committed to provide safe working conditions including:

- providing appropriate worker protections for their employees
- maintaining process safety programs to prevent or mitigate catastrophic events;
- conducting risk assessments and implementing emergency preparedness plans and response procedures; and
- providing safety and hazard information for the safe use of their products.

Suppliers and Third-parties must take into account the environmental issues. Thus, in their environmental policy, they shall endeavor to:

- obtain and comply with all required environmental permits, licenses, information registrations and restrictions;
- ensure safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges; and
- prevent and mitigate accidental spills and releases to the environment.
- endeavour to reduce or eliminate wastes of all types, including water and energy.

Reporting Concerns

SAFIC-ALCAN encourages its Third-Parties to seek guidance regarding SAFIC-ALCAN's policies when needed and to raise concerns regarding activities that may involve illegal activity, violations of policy or unethical conduct, including violations of SAFIC-ALCAN's Code of Conduct for SAFIC-ALCAN employees and this Third-Party Code of Conduct.

Concerns may be reported directly to SAFIC-ALCAN's local Management. If contact with local Management is not appropriate, to the SAFIC-ALCAN Group Management.

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