

Code of Conduct for Elkem’s Business Partners

Elkem’s Code of Conduct for Business Partners is based upon internationally recognised standards, focusing on ethical and legally compliant business practises, human rights, worker’s rights and environmental protection. By entering into an agreement with Elkem, the Elkem Business Partner (including suppliers, distributors, agents, resellers and joint venture partners) confirms to be bound by the following principles and requirements:

Ethical and legally compliant business practises

Elkem’s Business Partners will:

- Comply with all applicable laws and regulations;
- Not engage in or tolerate any form of direct or indirect corruption or bribery, including offering or accepting improper advantages that may influence decisions;
- Operate in accordance with applicable antitrust laws, including rules pertaining to price fixing and market sharing with competitors;
- Forbid and refuse to support money laundering and terrorist financing in any form;
- Respect the rights of indigenous peoples and local communities, including recognition of customary land rights.
- Respect the intellectual property rights of others;
- Protect confidential and personal information;
- Avoid conflicts of interest that may adversely influence business relationships.

Human rights and worker’s rights

Elkem’s Business Partners will:

- Set up and use an appropriate Health and Safety management system and provide its employees with a safe and healthy workplace in compliance with applicable laws and regulations;
- Promote equal opportunity and

treatment for its employees irrespective of skin colour, race, nationality, social background, disability, sexual orientation, political or religious conviction, gender or age;

- Respect the personal dignity, privacy and rights of everyone;
- Refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual harassment or discrimination;
- Provide fair remuneration and guarantee the applicable statutory minimum wage or defined living wage where minimum wage is not defined;
- Comply with the maximum number of working hours pursuant to applicable laws;
- Recognise, in accordance with applicable labour laws, the right of free association of employees and to neither favour nor discriminate against members of employee organisations or trade unions;
- Employ no workers under the age of 15 or, in those countries subject to the ILO Convention 138, to employ no workers under the age of 14;
- Limit dangerous work and night work to persons over 18 years of age;
- In all countries except in the United States, document all employment with written contracts that describe the conditions of employment in a language understood by the employee and are signed by both parts.

Environmental protection

Elkem’s Business Partners will:

- Act in accordance with the applicable statutory and international standards regarding environmental protection;
- Minimise the environmental impact of their activities and make continuous improvements in environmental protection;
- Set up and use an appropriate environmental management system that a) minimises the negative impact on the environment due to manufacturing processes or handling of raw materials and b) does not destroy resources or the income base of marginalised population groups through manufacturing or withdrawal of raw materials;
- Take reasonable efforts to avoid the use of raw materials that directly or indirectly finance groups that violate human rights.

Supply chain

Elkem’s Business Partners will:

- Use reasonable efforts to promote among their Business Partners compliance with this Code of Conduct. At a minimum Business Partners will communicate these requirements and take reasonable measures to verify that their Business Partners operate in accordance with these principles.

As Elkem’s Business Partner we hereby commit ourselves to comply with the requirements of this Code of Conduct:

Company name:	Date/Place:	Name and function:	Signature: