

Document title: ELKEM ASA PEOPLE POLICY	Revision R00	Doc.nr. ECM-PC-PO-139
		Valid from/date: 8 December 2021
Document owner (Role/Function): SVP HR		
Document approver (Role/Function): CEO		

Table of Contents

1. Purpose	2
2. Scope	2
3. Principles, objectives, and commitments	2
3.1 People strategy and organisation development:	2
3.2 Entry:.....	3
3.3 Competency Development cycle:.....	3
3.4 Employment:	5
3.5 Exit:	8
3.6 Other:	8
4. Roles and responsibilities.....	8
4.1 Implementation responsibilities:	8
4.2 Monitoring responsibilities:.....	8
4.3 Correction and reporting activities.....	8
5. Definitions and abbreviations	8
6. Deviation handling and approval	9
7. References	9
8. Policy maintenance	9
9. Revision log	10

1. Purpose

The purpose of this People Policy is to establish the principles related to the management of people in Elkem, and to define the roles and responsibilities across the organization.

The purpose is also to ensure that business units within Elkem adhere to standardized group HR procedures. HR representatives have an obligation to handle employment matters consistently supporting the employees throughout their employment lifecycle with Elkem. This document outlines the high-level principles and commitments required to achieve that consistency and it is supported by detailed global or local procedures and guidelines.

This policy is anchored in the Elkem Governance Policy.

Key terms and abbreviations used in this policy are defined in section 5 below.

2. Scope

This People Policy applies to all employees, including temporary personnel, and directors in Elkem ASA and subsidiaries, corporate affiliates, and joint ventures that are majority owned or controlled by Elkem (individually and collectively), commonly referred to as "Elkem" or "Group".

Elkem's activities are organized in a business structure consisting of divisions, functions and other units. Each division is organized in plants, sales offices and other units reporting to the respective division management. For the purposes of this policy, these organizational units will be commonly referred to as "units". The same term will be used to refer to units organized in and / or reporting to a function. All units must comply with this policy - adjusted, if necessary, to comply with international and local laws and regulations.

3. Principles, objectives, and commitments

PEOPLE POLICY STATEMENTS

It is Elkem's desire and responsibility to provide a sustainable working environment with fair terms of employment for all our workforce. Elkem is committed to equality and inclusion as well as respecting international human rights principles as defined in United Nations Global Compact and shall strive to ensure that Elkem does not abuse any human rights. Elkem is committed to treat people with dignity and respect and to operate in a fair and just manner.

Elkem expects our employees to engage in their work with commitment to our code of conduct and Environment, health and safety -standards and with a mindset of openness, inclusion and continuous improvement. All employees shall comply with the principles described in this policy.

3.1 People strategy and organisation development:

The Elkem Human Resources strategy and organisation design and development are vehicles to deliver on the business strategy and to develop the culture to leverage the critical competencies, core values and behaviour of the organisation. Our critical position planning process (CPP) is designed to identify gaps, future competence- and capacity needs and gap closing strategies incl. organisation models to ensure the organisational capability and capacity to deliver the business strategic targets.

Changes to number of people and needed competencies can happen both as increase and reduction. In situations where it is necessary to reduce the workforce, the process shall always comply with relevant legislation and agreements. The management shall involve their employees and their representatives at an early stage to run a process that is clear and constructive, both for the employees who leave the company and for those who continue. Change management is therefore an important part of leadership development activities in Elkem.

Workforce planning and employee related costs

Planning of the workforce and related costs are part of the annual budgeting process in Elkem. Budgeted changes in manning must be approved by the division SVP prior to implementation.

Changes in the workforce and related costs that are not part of an approved budget, must be approved by the division SVP and the SVP HR.

Workforce related to investments shall be approved as part of the Elkem process for investment approvals.

3.2 Entry:

Recruitment

All recruitments shall be pre-approved before initiation.

All open positions shall be posted internally (unless exceptional circumstances apply). All employees in Elkem are encouraged to apply for relevant positions. Internal Elkem candidates shall be prioritised in the selection, when their qualifications are evaluated as equal to external candidates.

HR shall always be involved in recruitment and candidates shall be interviewed by minimum two persons. All costs incurred in connection with a recruitment process shall be covered by Elkem. Applying for a position in Elkem shall be free of charge for the candidates.

Elkem will not approach the employees of our customers, competitors or partners directly with the intention to recruit them to Elkem.

Elkem encourages and facilitates mobility and rotations cross organisational structures and geographical areas as a means of enhancing company performance and providing the employees with a breadth of development opportunities.

Promotions and nomination approvals

To ensure mitigation against the risk of subjective evaluations, internal politics, informal decision processes, unconscious discrimination, etc. HR shall always be involved in the evaluation of internal promotions. All such promotions and nominations shall be approved by the local HR and the promoting leader's leader.

Background check policy

The quality assurance process of the candidates may vary from country to country due to local requirements and limitations by law. If there is doubt about the authenticity of documents provided by the candidate (internal or external), the issuer of the documents shall be contacted. A written consent from the candidate must be obtained in advance.

Elkem conduct extensive background check for selected positions defined in the Elkem recruitment procedure. In such case the candidate must have signed a letter of consent before the background check can be initiated.

3.3 Competency Development cycle:

Introduction and onboarding

All new employees shall feel welcome and included when they join Elkem. Leaders are responsible for planning the Elkem Onboarding Program (EOP) for newcomers in close cooperation with the local HR. This program introduces Elkem and the divisions as well as an introduction to our Code of conduct, Elkem Business System (EBS), Environment Health and Safety (EHS), sustainability and Elkem's values. The individual onboarding plan also includes other activities and training to familiarise with the company, colleagues and work tasks.

As part of the onboarding process all new employees also must do mandatory training on compliance and IP (intellectual property) as well as reading and signing declarations such as the Code of conduct, anti-corruption, competition law compliance and end user's agreement for Information Technology (IT).

Employee performance and development

Every employee shall know their targets and plan together with their leaders what support and resources they need in order to meet them, to further develop and perform well.

All employees shall contribute to a performance culture, that drives results through continuous improvement. It shall be safe for all employees to challenge the status quo in order to drive a culture of innovation. This requires that all employees receive regular constructive feedback on their performance and contribution to the working environment.

In Elkem this is done through both formal and informal channels, starting with the individual's job description and the annual Development Discussion (DD). In the DD, the individual's targets are set, and their performance is discussed, and feedback is given - in order to support changes in the work priorities in alignment with the strategic goals. Also the leader receives feedback from the employee in the DD for the same purpose of enhancing individual performance and cooperation. These discussions take place regularly.

All employees are responsible for their personal and professional development, utilising both Elkem internal and external competency development offering. Elkem is committed to ensuring that all staff has access to learning and development opportunities and resources that enable them to develop their skills and knowledge to be competent in their roles. Leaders are responsible for supporting all employees to attain, build and demonstrate the Elkem values, knowledge, skills and competencies needed to be successful in their roles. We use the DD to agree on a plan for relevant competency development needed to succeed in the employee's current position, but also preparing employees for the future, ensuring relevant competencies.

We encourage and support our employees in acquiring relevant formal education if needed for the current position or to develop into other positions in the future.

Elkem competency development model

10% development through classroom / online based training activities

70% development through taking input from classroom/online training and putting it into practice as part of the daily work with supervisor, colleagues, mentors, and improvement work in improvement teams

20% development through taking on new challenges

Elkem's training offering

The development discussions and the critical position planning process provide input to leaders and HR for competency development planning at individual, group and concept levels.

When external training is needed the leader shall contact local HR for support.

Elkem is offering a wide range of internal training. The offering is continuously evaluated and further developed to provide relevant competency development in the company.

Leadership training

Local HR is responsible for providing basic leadership training for all leaders with personnel responsibility according to Elkem standard. The standard is available on the intranet.

In addition, Elkem have corporate leadership programs for middle management and senior management. These programs are run regularly both at global and regional levels.

Other training

Elkem offers a wide variety of corporate and local training programs for all parts of our value chain. Information is available on the intranet and by local HR, as well as in the corporate Competency Development Department.

Transfers and relocation

Elkem encourage our employees to take on new challenges and job responsibilities in order to develop their competency and to develop the company culture of sharing and cross-divisional, -functional and -geographic learning.

If such change in responsibility includes relocation, Elkem offers good conditions to encourage and support employees on such development steps.

3.4 Employment:

Diversity, equality & inclusion (DEI)

Elkem is committed to equal opportunities in a diverse and inclusive working environment. We appreciate and recognise that every individual is unique and valuable and shall be respected for his or her individual abilities. We have zero tolerance for any form of harassment or discrimination based on gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age, or political opinion.

Elkem will provide equal employment opportunities and treat all our employees – and job seekers – fairly.

All Elkem employees shall act in line with and promote the Elkem values; respect, involvement, precision and continuous improvement.

We tolerate neither direct nor indirect negative discrimination, nor degrading treatment towards colleagues or business partners.

To further promote diversity, equality and inclusion, Elkem has established a targeted plan to support global and local DEI goals.

At Elkem we believe that our human capital is the most valuable asset. The collective sum of the individual differences, life experiences, knowledge, inventiveness, self-expression, unique capabilities, and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and company's achievements.

By embracing equal opportunities and a diverse and inclusive company culture Elkem aims at increasing our capabilities within innovation, customer centricity, cultural awareness and compliance.

Formal employment in Elkem

All Elkem employees shall have a written employment contract or other written documentation for employment complying with local legislation.

Elkem invests in our people and thus aim to offer permanent employment and limit the use of non-regular employment. During peak times, time limited projects or in the need of specialised, non-core competencies contracted and temporary employment can be considered. In such cases, Elkem is committed to fair compensation and priority rights to potential permanent employment.

Freedom of association and minimum working conditions

Elkem has a strong tradition for good and constructive dialogue between the employees and the leadership. Elkem thus recognises and respects the freedom of association and the right to collective bargaining in accordance with local, national legislation and practices. In countries where the local laws, practice or traditions do not support this, Elkem encourage channels and arenas where the employees are informed about the company's status and allowed to get information, raise concerns, and influence decisions affecting them.

Working hours shall be in accordance with local law or agreements. Where operation of the business makes it necessary to deviate from this, measures shall be taken to secure sufficient time for rest between each working period, and the actual working hours shall be in line with the intentions above.

Employees are entitled to medical treatment covered by the company in the event of sickness or injury resulting directly from their work in Elkem. In the event of work-related disablement or death, employees or their surviving immediate family member(s) will receive insurance payments and/or pension. In addition, employees shall be protected from being dismissed due to pregnancy or responsibility for newborn children, consistent with local customs and laws.

Elkem shall not allow children below the age of 16 to be employed in our operations. Elkem accepts programs for apprenticeships below the age of 16, but only where such programs enhance the child's education and development.

Elkem does not accept or use any form of forced labour or slavery in our operations in accordance with the definitions provided by the ILO. Employment in Elkem shall always be on a voluntary basis and without any form of threats, force or unlawful recruitment.

Elkem has a European Works Council (EWC) in accordance with the European Union Directive 2009/38/EC. The meetings are held once a year.

Flexibility and work-life balance

Elkem's overarching goal is to create value through customer satisfaction, continuous improvement and growth. To achieve this, we must develop productive and environmentally sound value chains and have control over our core processes. This is best achieved by developing an organisation culture based on participation and physical meetings at the workplace of all employees, teamwork and people empowerment.

Elkem is committed to providing flexibility in working hours and -location in accordance with local laws and regulations. Such flexibility can be offered by the company at the employee's request, provided that flexible working hours or -location contributes to increased efficiency and does not in any way prevent or hinder the employee in performing his/her job tasks.

Managing professional and personal life can be challenging. All Elkem companies shall have working terms which allow employees to combine working and family life. Elkem recognises that a better work-life balance can improve employee motivation, performance and productivity, and reduce stress. Therefore, we want to support employees to achieve a better balance between work and their other priorities, such as: dependant care responsibilities, special leave needs, leisure activities, further learning and other interests.

Compensation and benefits

Elkem aims at offering competitive, but not leading, salaries according to local standards and level. Surveys are conducted to review status and enhance equal salary for equal responsibilities. The base salary is reviewed annually. Other compensation elements, such as bonus programs, follow corporate standards.

All employees, including part time employees and temporary workers, shall have written documentation determining their compensation and benefits as well as working hours. The documentation or contract shall comply with national law and industry standards, whichever affords greater protection, and with negotiated company agreements. Employees shall be provided with at least one day off for every 7-day period. All full-time employees shall, as a minimum, receive wages and benefits which are sufficient to meet basic needs for food, clothing and housing.

Pensions and insurances are provided to all employees according to local legal requirements.

Sick leave

The company record the employees being absent from work due to sick leave or other related reasons. The employees absent are followed up by leader and HR according to local procedures and legislation. Our aim is to support the employee to recover to get him/her back to work as soon as possible. Both leader and employee are required to stay in contact and communicate during the absenteeism. Alternative work tasks and flexibility shall be discussed if that can ease the recovery and return.

Misconduct and disciplinary records

Misconduct and disciplinary actions and record shall always be treated in accordance with local laws in Elkem.

Speak up

The Elkem Code of conduct reflects our commitment to integrity in everything we do. If something is not right, we would like to know about it and take corrective action. Our compliance reporting system, "Speak up," provides all employees with a dedicated communication channel for reporting potential non-compliance with our Code of conduct.

We expect our leaders to endorse openness and to handle concerns from employees in a constructive and positive way. We also expect our leaders to inform all employees about Elkem's "Speak up" channel where concerns can be submitted anonymously.

Business travel

All business travel must be based on the need to be physically present. Before making a request for travelling the employee must consider the alternatives and if the meeting could be done digitally.

If there is a need to travel, a pre-approval from the leader shall be obtained before booking the travel. Cross continental travels shall be approved at SVP-level.

In order to ensure a cost focus the employees are encouraged to book tickets and accommodation well in advance, and use corporate / local agreements with travel agencies, hotels etc. Mid-range hotels shall be used and travels shall be executed in the fastest and most cost efficient way. Elkem encourage employees to use the most environmental friendly means of travel, when such alternative is available.

Elkem has a policy that gives high priority to safety for all activities. This means that EHS tools and requirements used internally in Elkem also apply for our employees when travelling. To secure our employees' safety we have implemented a corporate standard for business travel safety.

All employees travelling on business are covered by local Elkem travel insurance.

If a traveller as a result of accident, injury, illness or other incidents is indisposed, it is Elkem's highest priority to take care of the traveller. Elkem, represented by the traveller's leader or other relevant person, shall be informed as soon as possible. The traveller's leader is responsible for assistance to the traveller and shall give all necessary help to attend to the traveller's health and interests in such situations.

Immediately after return from a business trip, not later than one month, a travel expense report shall be prepared and sent to the right office according to local procedure.

Elkem is a global company with customers, suppliers, and production facilities worldwide. Elkem employees represent Elkem and are expected to promote Elkem's culture and values while showing respect for local conditions and culture when and wherever you travel for Elkem. Elkem's Code of conduct applies also for business travel and sets the standard for how employees shall act when you are traveling for Elkem.

Human Resources Information Systems (HRIS) governance

Elkem fully respects each individual's privacy and personal rights in all situations and activities not related to employment and work at Elkem.

During employment, Elkem reserves the right to establish and follow-up requirements for personal integrity, behaviour and actions in the working environment.

Elkem is committed to store and process information about our employees and business relations in a professional way to ensure their privacy. In general, Elkem expects all units and employees to handle personal data with outmost care and in a restrictive, secure and legitimate way.

Elkem is committed to treat people with dignity and respect and to operate in a fair and just manner extends to the handling of employee personal data.

Elkem leaders, HR and other the stakeholders take appropriate actions to protect personal data and compliant with applicable data privacy rules for storing, collecting and using personal data.

Monitoring

Elkem undertakes to continuously monitor the working environment in accordance with current law and regulations, and use the results to systematically improve the working environment. Such monitoring is important to build a company culture that drives employee engagement and inclusion and improves the employee experience. Based on the results, the management is able to prioritise topics that shall be further developed and engage in a further dialogue with their teams to create a motivating and developing working environment for all

employees. Benchmarking the results with other companies from the similar industries and/or location also gives relevant information about the employee satisfaction.

3.5 Exit:

Employees shall be treated in a fair and respectful manner, no matter the reason for the exit.

To avoid any misunderstandings the company requires a written resignation. HR invites the employee to an exit interview. Elkem has routines on terminating IT- access, returning equipment belonging to the company and signing a statement on confidentiality in connection with termination of employment.

The employee is entitled to a written confirmation of his/her employment.

3.6 Other:

Violation of this policy may be subject to disciplinary action, up to and including dismissal, depending on the facts and circumstances.

4. Roles and responsibilities

4.1 Implementation responsibilities:

- **Policy owner** is responsible for designing appropriate internal controls and necessary procedures to ensure compliance with the requirements set out in this policy
- **Unit managers** are responsible for implementing the requirements set out in this policy and associated procedures

4.2 Monitoring responsibilities:

- **Unit managers** are responsible for monitoring compliance with relevant procedures
- **Corporate Internal Control** are responsible for
 - Preparing an annual internal control report to policy owners and corporate management
 - Distributing the annual internal controls report to the respective policy owners and recommending corrective actions to close identified weaknesses / gaps

4.3 Correction and reporting activities

- **Policy owner** shall
 - Review the annual report from the internal control function and take action deemed necessary to ensure that any identified areas of non-compliance are satisfactorily addressed
 - Ensure continuous improvement of policy and related procedures based on identified weaknesses / gaps
 - Instruct unit managers to implement corrective actions based on documented deviations
 - Verify that corrective actions are implemented and report back to Corporate Internal Control
- **Unit managers** are responsible for implementing corrective actions as prescribed by the policy owner

5. Definitions and abbreviations

HR	Human Resources
SVP	Senior Vice President
CPP	Critical position planning

DD	Development discussion
EOP	Elkem Onboarding program
Business travel	All travels performed by employees on behalf of Elkem, to places outside the employee's normal place of work.
DEI	Diversity, Equality and Inclusion
HRIS	Human Resources Information Systems

6. Deviation handling and approval

Anyone applying for a deviation from this policy must obtain written approval from the document owner before the change / activity is implemented.

The document owner is responsible for maintaining appropriate documentation of approved policy deviations

7. References

Reference no.	Document name/description
	Elkem global recruitment procedure
	Elkem Foreign Assignment guideline
	Elkem Code of conduct
	Elkem Onboarding Program
	Company sponsored education guideline
	Elkem Mobility guideline
	Elkem Human rights policy
	Elkem European Works Council agreement
	Elkem compensation and benefits guideline (TBD)
	Elkem salary review guideline (TBD)
	Elkem Speak up policy
	Corporate standard for business travel safety
	Elkem exit procedure

8. Policy maintenance

To ensure that its content remains current and relevant, this policy will be subject to the following maintenance activities:

- The policy owner is responsible for reviewing the content of this policy, making any necessary amendments, and capturing feedback from individuals deemed relevant by the policy owner.
- The policy owner must review the content on an at least annual basis, but amendments can be made at any time.
- The policy owner will circulate the amended policy to the CEO for approval.

- The CEO will review and (re-)approve the policy on an at least annual basis, but can also approve amendments on an interim basis, as they occur.
- Attachments to this policy may be approved by the policy owner, without the need for formal re-approval of the policy.

9. Revision log

Rev nr	Date	Changes	Changed by	Approved by
000	081221	First version	SVP HR	CEO