

# Marine Aluminium Code of Conduct

## Legal Compliance

- One should always comply with all relevant laws and regulations

## Corruption and Bribery

- One must never tolerate or accept any form of corruption or bribery, and never engage directly or indirectly in any form of such.
- One must never grant, offer or promise anything of value to a government official or to counterparty in the private sector to influence official action or obtain an improper advantage.

## Fair Competition, Anti-Trust Laws and Intellectual Property Rights

- One must act in accordance with national and international competition laws, and never participate in price-fixing, market or customer allocation, market sharing or bid rigging with competitors.
- One should always respect the intellectual property rights of others.

## Conflict of Interest

- One should always avoid all conflicts of interest that may adversely influence business relationships.

## Respect for Basic Human Rights of Employees

- One should always promote equal opportunities and treatment of employees regardless of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious convictions, sex or age.
- One should always respect personal dignity, privacy, and rights.
- One should always refuse to employ, or make anyone work against their will, and to ensure that no forced labor or human trafficking is present. This also applies to any partner or sub-contractors we are in attachment to.

- One should always ensure that all employees get a work/hiring contract they understand and agree with, covering basic employment rights and duties such as but not limited to:
  - An understandable salary statement that includes regular and overtime hours
  - Regular and overtime earnings and deductions
  - Payment according to applicable laws, industry standards or relevant collective agreements, and no less than minimum wage
  - Minimum of one weekly day off
  - Procedures in case of illness
  - Layoff and resignation notice
- One must always ensure that all of management support all employees rights to freely associate and collectively bargain without unlawful interference. As well as recognize, as far as legally possible, the right of free association of employees, and to neither favor nor discriminate against members of the employee organization or trade unions.
- One must always refuse to tolerate any unacceptable treatment of employees including gestures, language and physical contact, such as but not limited to: harsh or degrading treatment and sexual or physical harassment
- One must always comply with the maximum working hours in applicable laws.
- One must comply with ILO convention C143, Migrant Workers.

## Prohibition of Child Labor

- One must never employ workers under the age of 15, or in those countries subject to the developing country exception of the ILO Convention 138, to employ no workers under the age of 14.
- One should always follow national laws which permit employment of children between 12 and 15 years to perform very few hours of light work per day. This must not interfere with the children's education.
- One should never employ workers under the age of 18 to perform any type of work, which can jeopardize their health, safety, or morals.

## Health and Safety of Employees

- One should always take responsibility for the health and safety of all employees.
- One should always try to control hazards and take the best and reasonable precautions against accidents and occupational diseases.
- One should always provide training and ensure that employees are educated on health and safety issues.
- One should always provide Personal Protection Equipment (PPE) and monitor the usage of PPE.
- One should always use a reasonable, occupational health and safety management system.

## Environmental Protection

- One should always act in accordance with the applicable statutory and international standards regarding environmental protection.
- One should always try to minimize environmental pollution and make continuous improvements in environmental protection.
- One should set up and use a reasonable environmental management system.

## Supply Chain

- One must always ensure compliance with our Code of Conduct among suppliers, and to follow up on this compliance.
- One must always comply with the principles of non-Discrimination with regard to supplier selection and treatment.

## Conflict Minerals

- One should always make reasonable efforts in avoiding the use of raw materials, which directly or indirectly finance armed groups who violate human rights.

## Ethics Helpline

- One must ensure that employees, managers and external stakeholders are able to raise concerns anonymously, and that these are solved in a fair way and without any form of retaliation against the person who raised concern

## Data Security and Privacy

- One should follow all legal requirements for data protection and remain committed to protecting rights and privacy as stipulated in the European GDPR (General Data Protection Regulation).

We encourage immediate reporting of any suspect violations of this Code of Conduct through proper channels like whistleblowing, and we forbid any form of retaliation for fulfilling this obligation.