Sustainable Procurement charter

Aluminium Dunkerque

1 FOREWORD

This Supplier Charter applies to Aluminium Dunkerque's main Suppliers and Subcontractors (those representing 90% of the company's purchasing expenditure) and applies to all categories of products and services purchased by Aluminium Dunkerque. Additional requirements also apply to suppliers of raw materials. We encourage our suppliers to take a similarly responsible approach within their own supply chain and to join the UN Global Compact, the Aluminium Stewardship Initiative (ASI) or any other equivalent sustainable development programme.

2 ALUMINIUM DUNKERQUE'S COMMITMENTS

As part of our responsible supply chain management policy, we are committed to ensuring that as many of our suppliers as possible adhere to the Codes of Conduct, the Aluminium Dunkerque Purchasing Policy, this Charter and the General Purchasing Conditions. These documents are available on our website https://www.aluminiumdunkerque.fr/ and define Aluminium Dunkerque's environmental, social and governance commitments.

2.1 Commitments relating to our policy on human rights and conflict-affected or high-risk areas.

2.1.1. General

a. This Charter confirms our commitment to respect Human Rights, to avoid contributing to the financing of conflict, and to comply with UN sanctions, resolutions and rights.

b. We are also committed to using our influence to prevent abuses by others through risk-based Due Diligence of the supply chain, implementing the OECD's five-step framework for responsible supply chains of minerals from Conflict-Affected and High-Risk Areas.

c. We undertake to be audited periodically by the ASI to verify our compliance with the principle of good conduct in matters of human rights.

2.1.2 Regarding serious violations:

a. We will not tolerate, profit from, contribute to, support or facilitate, for any party, any perpetration of:

i. All forms of torture or cruel, inhuman and degrading treatment

ii. All forms of Forced or Compulsory Labour

iii. Worst forms of Child Labour

iv. Other gross Human Rights violations and abuses such as widespread sexual violence

v. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

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b. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 2.1.2.a.

2.1.3. Regarding direct or indirect support to non-state armed groups:

a. We will not tolerate any direct or indirect support to non-state armed groups that are identified by the UN Security Council.

b. We will immediately suspend or discontinue engagement with all suppliers, including second tier suppliers, for which we have identified a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 2.1.3.a.

2.1.4. Regarding public or private security forces:

a. We recognise that the role of the public security forces is to maintain the rule of law, including safeguarding human rights, providing security to workers, equipment and facilities.

b. We will not provide any direct or indirect support to public or private security forces committing serious violations as defined in paragraph 2.1.4.a, or acting illegally as described in paragraph 2.1.3.a.

c. With regard to the private security companies we use, we ensure that they meet the necessary security requirements.

2.1.5. Regarding bribery and fraudulent misrepresentation of the origin of raw materials:

We will not offer, promise, give or demand any bribes, and will resist any inducement to conceal or disguise the truth about the origin of our raw materials, or to misrepresent taxes, duties and fees to governments.

2.1.6. Regarding money laundering and the payment of taxes, duties and fees due to governments:

a. We will support and participate in efforts to eliminate the risk of money laundering.

b. We will support the payment and reporting of all taxes, fees and duties payable to governments from Conflict-Affected or High-Risk Areas.

2.1.7. Regarding Health and Safety:

We are committed to achieving zero accidents and injuries, as well, more generally, contributing to well-being in the workplace and beyond. This is reflected in the Health and Safety Policies and Procedures through which we seek to promote this philosophy. Aluminium Dunkerque asks its suppliers to remedy any occupational accidents that occur to their staff, and to comply with Aluminium Dunkerque's health and safety policies, which are integrated into the General Policy and Purchasing Policy.

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2.2 Commitments relating to our environmental policy at the supply level

We are committed to making aluminium more sustainable. To achieve this objective, Aluminium Dunkerque uses its expertise in the field of aluminium to develop cleaner processes and works to minimise the impact on the environment. We seek to work with suppliers who are committed to the same objectives and who apply best practice in environmental management, including energy and resource efficiency, biodiversity management, waste reduction and recycling. We require our suppliers to comply with effective environmental impact management policies, processes and procedures, and to conduct their business in a manner consistent with the Environmental Policy incorporated in the General Policy and Purchasing Policy.

2.3 Documentation and control

At Aluminium Dunkerque's request, our suppliers will be asked to:

- Complete the qualification questionnaire.
- Complete a self-assessment questionnaire based on our ASI requirements and this Charter.
- Provide Aluminium Dunkerque or its representatives with copies of all relevant information, to cooperate and to do their utmost to ensure that their subcontractors do the same.
- Provide evidence of efforts to comply with the requirements of the Charter.
- Provide evidence of efforts to have effective management systems in place to achieve the social, environmental and governance objectives to which they are committed.
- Show, over time, that they have policies and procedures in place to achieve these objectives and that performance is evaluated and monitored over time.

The Code is an integral part of Aluminium Dunkerque's supplier management and assessment procedure. Aluminium Dunkerque will adopt a risk-based approach to assess supplier compliance with the requirements of this Charter.

Monitoring may take the form of self-assessments, site visits, audits and follow-up of corrective actions. Aluminium Dunkerque will work with its suppliers to remedy the shortcomings identified.

Aluminium Dunkerque reserves the right to no longer work with suppliers who do not comply with the provisions of this Charter, or who do not propose an improvement plan or who do not comply with it.

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3 COMMUNICATION

We ask our suppliers to alert us to any concerns regarding human rights, the environment, ethical rules, particularly with regard to corruption and influence peddling, by using the Whistleblower tool available by clicking on the following link or by scanning the QR Code.

https://whistleblowersoftware.com/secure/98b1c541-3d45-4f93-bf1e-681d526f8fb2/channel-select

4 REVISION

We undertake to revise this charter when any significant changes are made or following an inspection, in the event that any discrepancies are found and, in any event, at least every five years. The Purchasing Department also undertakes to make this document available on the Aluminium Dunkerque website.

5 SIGNATURE

I, the undersigned, hereby confirm:

- That we have received and fully read the following documents (tick those you have received and read)
  - ☐ Responsible Purchasing Charter
  - ☐ Code of Conduct
  - ☐ Anti-Corruption Code of Conduct
  - ☐ Purchasing Policy
  - ☐ General Purchasing Conditions

- That we adhere to and undertake to respect these principles, and that failure to do so may be considered a breach of our obligations, which may result, depending on its seriousness, in the termination of the contract;

- That we will inform all our suppliers, and encourage them to follow these principles

Name of the company: ……..

Representative's name and position: ……

Done in: ……..

On: ……/……/……..

Signature: