

Slavery and Human Trafficking Statement for Sapa group and all our subsidiaries

This statement is made pursuant to section 54 of the United Kingdom Modern Slavery Act 2015.

Sapa is the world leader in aluminium solutions. We have 22,400 employees in more than 40 countries, and we have production in 25 countries. Our headquarters are located in Oslo, Norway and the holding company of the Sapa group is Sapa AS registered in Norway.

Sapa is a signatory to the United Nations Global Compact and supports the United Nations Universal Declaration of Human Rights and the core labour standards of the International Labour Organisation. Sapa is committed to eradicate slavery and human trafficking in our supply chain as well as our own operations. Our efforts to achieve this include the following:

Own operations

Sapa Code of Conduct

Sapa's Code of Conduct reflects our continued commitment to applying ethical business practices and legal compliance throughout our global organization wherever we operate and conduct business on behalf of Sapa. Our Code of Conduct is designed to help all employees to make the right decisions for themselves and for Sapa.

Sapa is committed to respecting and supporting the human rights of all individuals potentially affected by our operations. We respect the fundamental principles set forth in the United Nations Universal Declaration of Human Rights. We recognize the important role and responsibility that business can have in supporting the observation of human rights. Through our operations, we are committed to contributing to personal and professional growth of our employees and to sustainable development of the communities in which we operate.

Sapa supports and respects internationally recognized labor rights, including the freedom of association and the right to collective bargaining within national laws and regulations. We are opposed to all forms of human trafficking and shall never employ or contract child labor or any forced or compulsory labor.

Whistleblower channel – Sapa AlertLine

It is everyone's right and responsibility to take action and to speak up or ask for guidance when there are suspected violations against Sapa's Code of Conduct, values, policies, or illegal behavior. Our Code of Conduct describes the options available to our employees to report a concern, what happens when they report, and our strict non-retaliation policy.

Supply chain

Our supplier declaration

Our objective is to work only with suppliers who support our principles of ethical and compliant business conduct. Sapa's Code of Conduct provides a framework for what we consider responsible conduct. Sapa works towards achieving high standards of business conduct and we expect the same approach from our business partners. In addition, Sapa's

Corporate Social Responsibility (CSR) principles require continuous improvement of supplier standards towards our CSR proposition.

All suppliers that have a direct contractual relationship with Sapa and offer products or services to Sapa are expected to sign and adhere to Sapa's Supplier Declaration. Sapa's Supplier Declaration sets out the minimum standards in key areas including business ethics and anti-corruption, as well as human rights, labour conditions and CSR for Sapa's suppliers.

Risk based Compliance and Sustainability Audits

Sapa regularly conducts risk assessments of our supply-chain where we take a holistic approach to risk. Strategic suppliers are audited regardless of risk. Any violation of the values and principles set forth in Sapa's supplier declaration may be regarded as a material violation of the contractual obligations towards Sapa. Sapa reserves the right to immediately cease any business for cause with any supplier who is in clear, verifiable violation of the values and principles set forth in this declaration.

We will continue to update our regulations and procedures as required to ensure they maintain appropriate safeguards against any mistreatment of persons involved in our supply chain or own business.

Egil Hogna

CEO & President Sapa Group