

ALTUM Supplier Code of Conduct



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1. Purpose and Application

The ALTUM Supplier Code of Conduct sets out the conditions for all ALTUM partners from whom goods are purchased or services are received, with the goal of ensuring principles of fair cooperation. It outlines the desired actions, encouraging the implementation and execution of various environmental, social, and governance aspects to minimize potential negative impacts on sustainability—covering environmental, social, labor, human rights, anti-bribery, and anti-corruption factors. ALTUM aims to promote stable and sustainable prosperity, ensuring that its partners act responsibly, including improving the quality of life for society at large and contributing to environmental preservation.



2. Definitions and Abbreviations

- 2.1.** Certification: A commitment signed by the partner to adhere to ALTUM's Supplier Code of Conduct.
- 2.2.** Partner: A partner of ALTUM from whom ALTUM plans to purchase or purchases goods and receives or plans to receive services.
- 2.3.** Supplier: A partner bound by the ALTUM Supplier Code of Conduct as stipulated in Appendix No. 1.

3. General Terms

- 3.1.** ALTUM recommends that all partners follow the requirements of this Code, but mandates it for suppliers that meet the criteria specified in Appendix No. 1. The appendix may be updated periodically.
- 3.2.** Each supplier must commit to adhering to the Code in writing before entering into a contract with ALTUM.

4. Introduction

- 4.1.** Sustainability is an integral part of ALTUM's daily operations, reflected in every area of activity. ALTUM works in accordance with its approved strategy and values, promoting innovation and change, and thus contributing to business sustainability and economic development.
- 4.2.** ALTUM recognizes, evaluates, and voluntarily takes responsibility for the long-term social, environmental, and economic impact of its operations.
- 4.3.** ALTUM acknowledges the importance of improving supply chain relationships to ensure a faster transition to a sustainable society in line with the UN Sustainable Development Goals (SDGs) and the Paris Agreement on climate change.
- 4.4.** ALTUM can significantly impact the following SDGs through procurement and supplier selection:
- 4.5.** ALTUM strives to cooperate with suppliers to develop sustainable supply chains and contribute to achieving the SDGs.



Decent Work and Economic Growth



Responsible Consumption and Production



Climate Action



Peace, Justice, and Strong Institutions

- 4.6.** The Supplier Code of Conduct applies to all ALTUM employees responsible for procurement and contract signing. They must familiarize partners with the Code's provisions and obtain written confirmation of compliance.
- 4.7.** ALTUM has zero tolerance for bribery or corruption in any form.

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5. General Requirements

- 5.1.** ALTUM expects its partners to systematically manage significant sustainability issues, respecting human rights and adhering to legal and ethical standards of employment and governance.
- 5.2.** ALTUM seeks to cooperate with companies of good reputation and aims to foster productive and sustainable business relationships.

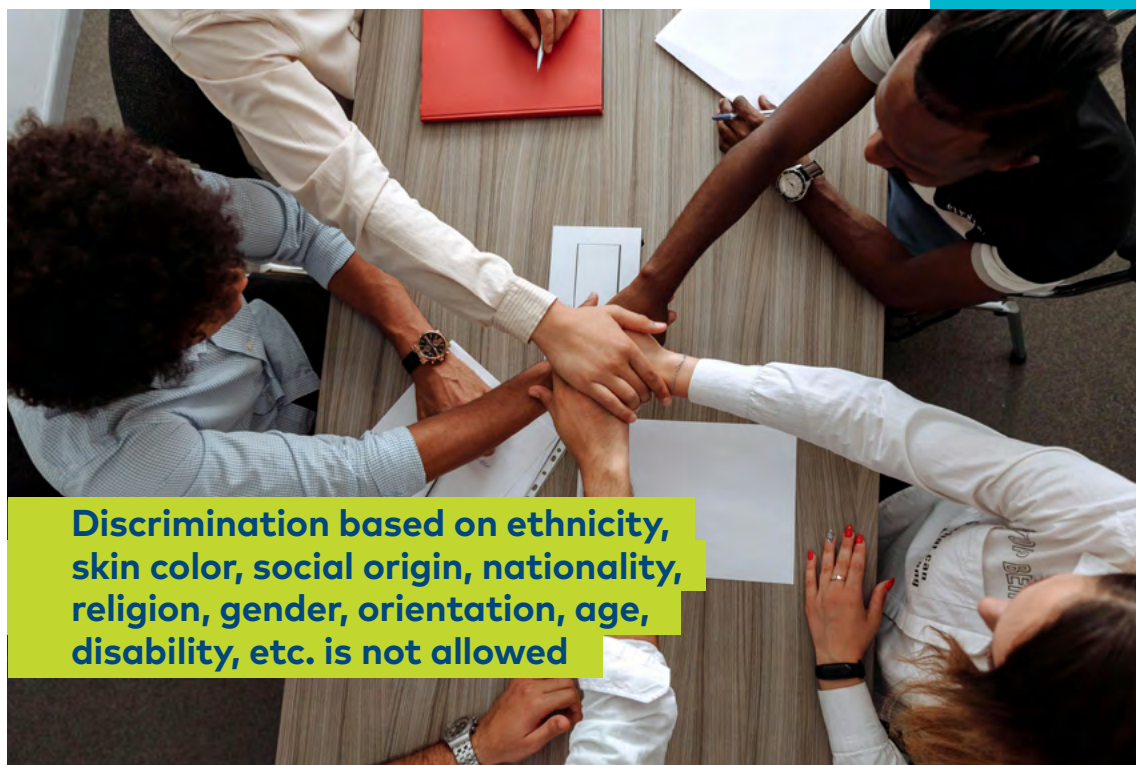
6. Human Rights



We expect a commitment to respect human rights from the cooperation partners

- 6.1.** Partners are expected to avoid and prevent any human rights violations. They should not tolerate any forced labor, slavery, or unpaid employment, and must respect human rights.
- 6.2.** Recommended actions include:
 - 6.2.1.** Preventing human rights violations.
 - 6.2.2.** Assessing the impact of their operations on human rights.
 - 6.2.3.** Respecting employees' and others' privacy, ensuring personal data protection.
 - 6.2.4.** Engaging in public discussions to improve human rights protection.
 - 6.2.5.** Implementing programs to support the rights of vulnerable groups.
 - 6.2.6.** Providing mechanisms for addressing grievances related to human rights violations.
 - 6.2.7.** The development, status and results, as well as the impact of activities related to human rights in the business environment, are publicly reported.

7. Workplace Environment and Non-Discrimination



Discrimination based on ethnicity, skin color, social origin, nationality, religion, gender, orientation, age, disability, etc. is not allowed

- 7.1.** ALTUM expects partners to comply with laws regulating working conditions. Employee health and safety should always be a priority, with clear procedures in place.
- 7.2.** Discrimination of any kind based on ethnicity, skin color, social origin, nationality, religion, gender, sexual orientation, age, physical ability, disability, health status, political views, or membership in professional organizations is not acceptable.
- 7.3.** Recommended measures include:
 - 7.3.1.** Implementing equality and non-discrimination policies.
 - 7.3.2.** Introducing policies on workplace safety and health protection.
 - 7.3.3.** Ensuring that employees are provided with training on health and safety risks.
 - 7.3.4.** Effective mechanisms are implemented and available to employees to address issues related to equal opportunities and the working environment.
 - 7.3.5.** Employees are provided with appropriate information, instructions, and regular training on health and safety hazards, risks, preventive measures, and emergency procedures necessary for performing their work duties.

8. Environment and Climate Change



**We expect measures from suppliers
for mitigating climate change**

8.1. ALTUM expects partners to engage in environmentally friendly business practices, complying with environmental regulations, and taking measures to reduce their environmental impact. Suppliers are expected to contribute to the Paris Agreement goals and reduce their waste through recycling and efficient waste management systems.

8.2. Recommended Measures:

- 8.2.1.** Maintain an environmental management system based on continuous improvement, which includes:
- written environmental protection policy, if required by applicable laws.
 - process to identify, evaluate, monitor, and minimize risks associated with products and services that have a significant environmental impact.
 - process to document environmental performance related to products and services that significantly impact the environment.
 - process to ensure compliance with all applicable environmental laws and regulations.
- 8.2.2.** Apply the principles of the circular economy, lifecycle cost assessment, and lifecycle perspective in design, production, transportation, recycling, or disposal.
- 8.2.3.** Provide information upon request regarding the real or potential opportunities for reducing greenhouse gas emissions (GHG) associated with the supplier's products or services.
- 8.2.4.** Calculate the company's Scope 1 and Scope 2 GHG emissions annually.
- 8.2.5.** Commit to reducing the company's GHG emissions and, upon request, disclose targets and progress.
- 8.2.6.** Have a certified environmental management system (e.g., ISO 14001).
- 8.2.7.** Have a certified energy management system (e.g., ISO 50001).
- 8.2.8.** Publicly report on progress, status, and results, as well as the impact of activities related to environmental protection and climate change.

9. Anti-Bribery and Corruption

Cooperation partners are invited to provide high ethical standards



- 9.1.** ALTUM expects its partners to eliminate all forms of corruption, blackmail, and bribery, ensuring high ethical standards.
- 9.2.** Partners must strictly comply with laws that prohibit anti-competitive practices.
- 9.3.** Suppliers must manage conflicts of interest properly.
- 9.4.** Suppliers must avoid tax evasion and money laundering.

9.5. Recommended Measures:

- 9.5.1.** Respect the rights of end-users, employees, and other partners regarding transparency of information.
- 9.5.2.** Implement a code of conduct or guidelines that regulate business ethics issues, and provide training for employees on these topics.
- 9.5.3.** Implement a whistleblowing program that allows for anonymous reporting of violations of certain policies or legal requirements, where required by law.
- 9.5.4.** Publicly disclose information about measures taken to prevent bribery and corruption.

For suppliers who decide to cooperate with ALTUM and comply with Annex no. 1 criteria, must confirm in writing the commitment to comply with the ALTUM Supplier Code of Conduct.

Appendix No. 1

Criteria for Suppliers Required to Provide Written Confirmation

The criteria that determine which ALTUM suppliers are required to sign a written confirmation to adhere to the Supplier Code of

Conduct is if the contract amount (excluding VAT) is equal to or greater than 100,000 EUR