

Introduction

The Core Values of Alustrax support a strong commitment to economic, environmental, and socially sustainable development. Alustrax strongly believes it is in the mutual interest of both our self and our suppliers to meet the present and future requirements of our markets and society. This is done by demonstrating responsibility towards the people taking part in the manufacture of products or services, which enable Alustrax to be a leading manufacturer within machining of aluminium.

To make our position clear to you as our supplier, we have set up this Alustrax Code of Conduct:

1. Supplier relationships

Alustrax recognizes that our dealings with suppliers often take place in cultures with different norms and values. Certain standards, however, as set out in this Code of Conduct, are universally applicable and we expect everyone with whom Alustrax has commercial dealings to meet these standards.

Alustrax expects its suppliers to respect our Code of Conduct in the context of their own culture. The relationships with our suppliers are always based on the principle of fair and honest business.

Alustrax does not accept bribe in any form, or the use of other routes or channels to provide improper benefits to customers, agents, contractors, suppliers, or employees of any such party or governmental officials. These principles are dealt with and part of Alustrax's internal policies.

Alustrax specifically expects its suppliers to extend the same principle of fair and honest dealings to all others with whom they do business, including employees, producers, sub-contractors and other third parties.

2. Legal compliance

Suppliers must comply with their respective national laws and regulations and with international conventions concerning social and working conditions, child labor and the protection of the environment.

When a relevant national law and one of the standards as defined in this Code of Conduct address some issue, the more stringent of the two should be applied.

If any contradiction is found between a relevant national law and one of the standards as defined in this Code of Conduct, the supplier must inform Alustrax and give relevant details of the contradiction.

3. Child Labor (UN Convention of the Rights of the Child, ILO Conventions nos. 79 138, 182 and ILO Recommendation 146)

Alustrax respects the children's' right to development and education. Therefore, we do not accept child labor, meaning that we do not accept use of children as a work force in production. Child labor is defined as work done by children younger than 15 years of age or younger than the age of completing local compulsory school. However, the local legal minimum age for employment must never be violated. Young workers (15-18 years of age) shall not be employed in work that put their health or safety in danger.

If a supplier is violating the above Code of Conduct the following steps will be taken:

New recruitment of child labor that does not conform to the above-mentioned conventions will not be accepted. If such child labor is already taking place, work for immediate actions of remediation shall be initiated. However, the children concerned shall be given the possibility of earning livelihood as well as acquiring an education until they are no longer of compulsory school age.

4. Forced Labor (ILO Conventions nos. 29 and 105)

Forced or involuntary labor is not tolerated by Alustrax. This includes prison work, work on a forced contract, slavery, and other forms of work, which are done against one's will or choice. There must be no deductions in salary because of fines or penalties imposed during the execution of disciplinary punishment unless this is done with reference to a collective agreement or permitted by law. Workers shall not be required to lodge deposits, original identity papers or work permit with the employer or any other body on behalf of the employer.

5. Working Hours and Salary (ILO Conventions nos. 1, 14, 26, and 131)

Alustrax recognizes the need for a healthy balance between work and spare time for all employees. Unless the national law is different, the maximum standard working week is 48 hours per week or 60 hours per week including 12 hours' overtime work. All workers have the right to at least one day off following six consecutive days worked.

Salaries for overtime work shall be in accordance with the law. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards, or industry benchmarks, whichever is higher. In any event wages should always be high enough to meet basic needs and to provide some discretionary income.

6. Health, Safety and Working conditions (ILO Conventions no. 155 and ILO Recommendation no. 164)

Suppliers must ensure that they or their producers or sub-suppliers abide by all local laws, directives and regulations relating to health and safety in the workplace or in any other location other than the workplace where production or work is undertaken and that they implement any amendments to these laws, directives, or regulations.

Alustrax expects its suppliers to provide safe and adequate working facilities for all its employees. Specifically, and as a minimum:

- access to clean sanitation facilities, drinking water and fire escapes
- provision of meal breaks
- adequate ventilation and temperature controls

Workers shall receive regular and documented health and safety training, and such training shall be repeated for new workers.

If provided for personnel, dormitory facilities shall be clean, safe, and meet the basic need for all personnel.

7. Disciplinary practice

Suppliers shall treat each of their workers with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse

8. Prohibition of Discrimination (ILO Conventions nos. 100,111, 143 and 159)

Alustrax expects its suppliers to treat everyone fairly when selecting and dealing with their employees and should not treat any person less favorably because of their race, color, religion, sexual orientation, age, gender, nationality, disability, Marital or health status, union membership, political affiliation, or ethnic origin.

9. Freedom of association and the right to bargain collectively (ILO Conventions nos. 87, 98, 135 and 154)

Alustrax respects the employees' right to organize and bargain collectively. This means, that also suppliers must recognize their employees' freedom to choose whether to associate with or establish any organization including labor organizations.

Workers' representatives shall not be discriminated, and they shall have access to carry out their representative functions in the workplace

If the right to join or form trade unions is limited by law, the employer shall facilitate, and under no circumstances hinder parallel means of independent and free association and bargaining.

10. Recognized employment relationships & employment contracts

All workers should be entitled to an employment contract. To every extent possible, work performed shall be based on recognized employment relationship that protects the employee's rights and social security as established through national law and practice. Obligations to employees shall not be avoided using labor-only contracting, sub-contracting, or other labor regulations.

All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time that they are paid.

11. Protection of the Environment

All Alustrax suppliers shall strive to conduct their business in a manner that reduces the negative influence in the environment as much as possible. This shall apply to the whole supply chain from production of raw materials to the consumer sale.

Suppliers must fulfil the obligations and policy stated by local and national law. In addition, the suppliers must strive to reduce waste and emissions to air, ground and water, handle chemicals in an environmentally safe way, handle, store and dispose of hazardous waste in an environmentally safe manner and contribute to the recycling and reuse of materials and products.

To produce wooden products, the suppliers shall use wood from known areas and if possible, from sources that are well managed and preferably independently certified as such.

12. Consideration for marginalized populations

Production and extraction of raw materials for production shall not contribute to the destruction of the resources and income base for marginalized populations, such as in claiming large land areas or other natural resources on which these populations are dependent.

13. Management

The supplier shall appoint a senior management representative who, irrespective of all other responsibilities, shall ensure that the requirements of this standard are met.

Any sub-contracting shall be agreed upon by Alustrax prior to any production. Suppliers to Alustrax's supplier shall be traceable concerning manufacturing location.

Appropriate records shall be maintained to demonstrate conformance to the requirements of this standard.

The supplier shall provide for non-management personnel to choose a representative from their own group (preferably a union representative) to facilitate communication with senior management and Alustrax or representatives appointed by Alustrax on matters related to this Code of Conduct.

14. Monitoring

Alustrax expects that suppliers will actively conduct self-assessments and monitor their day-to-day management process to ensure compliance with this Code of Conduct. In addition, Alustrax will carry out audits to verify that this Code of Conduct is followed.

Alustrax reserves the right that we, or representatives appointed by Alustrax will have free access to the production plant, with or without prior notification. Such representatives must document a signed approval from Alustrax.

15. Breach of the Code of Conduct

In cases where Alustrax finds that the supplier is in breach with this Code of Conduct, we will strive to find a solution where the supplier within an agreed period of time will be operating in accordance with the Code of Conduct. If the supplier after this agreed period has not improved on the current issue and has not shown a willingness to respect the Code of Conduct, we will terminate the cooperation with the supplier.

16. Development of the Code of Conduct

Alustrax will review this Code of Conduct on a regular basis and will introduce revisions where necessary. This includes continuous evaluation and, if applicable, improvement of our own policy and purchasing practices to facilitate suppliers and subcontractors' compliance with this Code of Conduct. Suppliers are invited to contribute towards the further development of this Code of Conduct.

17. Declaration

We hereby declare that we have read and understood this Code of Conduct and that we will fulfil the requirements stated. In the case of non-compliance of this Code of Conduct we will inform Alustrax about this and submit a plan for how to reach compliance.

We furthermore agree to inform our suppliers and sub-contractors about this Code of Conduct and do everything we can to ensure that they also comply with the requirements stated.

Company name:

Date: Place:

Sign:

Chop:

ILO conventions and recommendations:

International Labor Organization conventions and recommendations cover a broad range of subjects concerning work, employment, social security, social policy and related human rights. Conventions ratified by member states are legally binding international treaties. The recommendations serve as non-binding guidelines.

UN Convention of the Rights of the Child:

The United Nations Convention on the Rights of the Child is the first legally binding international instrument to incorporate the full range of human rights; civil, cultural, economic, political, and social rights for children.