

# CODE OF CONDUCT FOR BUSINESS PARTNERS



## INTRODUCTION

The Stena Metall Group provides value by offering competitive, sustainable business solutions in the area of recycling and resource management services, processing, distribution and trade with new and recycled resources, financial operations and development of new business solutions.

The Stena Metall Group is perceived and acknowledged as a leader in the business areas and geographical areas in which it operates. This position has been achieved through sound business principles and conduct characterized by reliability, simplicity and development when interacting with business partners and other stakeholders.

The suppliers, subcontractors, agents, joint ventures, customers and other actors that the Stena Metall Group partners with are important stakeholders, and integral to the Group's continued success. We therefore expect the same high standards from our business partners as we do in our own operations. This Business Partner Code of Conduct is aligned with the internal Code of Conduct, which applies to all employees of the Stena Metall Group.

When we evaluate and select business partners, we will assess their ability to comply with the requirements of our Code of Conduct for Business Partners. Any business partner who does not meet and respect these standards runs a risk of being excluded from our value chain, possibly including cancellation of existing contracts.

Any concerns or questions regarding the Business Partner Code of Conduct can be raised to the business partner's contact person within the Stena Metall Group.



## SCOPE

This Business Partner Code of Conduct applies to suppliers of products and/or services to any entity of the Stena Metall Group, as well as to other business partners in the Group's value chains whose actions or inactions could reflect on the sustainability performance, brand or reputation of the Stena Metall Group. We also encourage our business partners to implement similar requirements towards suppliers or subcontractors in their own value chains.

## LEGAL COMPLIANCE

The Stena Metall Group expects all business partners to be knowledgeable about, and to comply with applicable laws and regulations in all countries where their business is conducted. This includes having in place all applicable permits, licences, and/or any other legally required documents and registrations.

In cases where local laws and regulations are less stringent than this Business Partner Code of Conduct, the principles of the Code of Conduct shall apply as a minimum requirement. However, if there should be a direct contradiction between local legislation and this Business Partner Code of Conduct, the local regulation shall take precedence. If such a situation should occur, the business partner shall inform their contact person within the Stena Metall Group of the contradiction.

## BUSINESS ETHICS

**Fair competition:** Business partners are expected to compete in a fair manner and follow applicable laws and regulations regarding antitrust and competition. Business partners shall not enter into any agreements – formal or otherwise – with competitors on pricing, market sharing, or any other activities violating rules on fair competition.

**Responsible trade:** In all countries where business is conducted, business partners shall comply with applicable international export, import and trade laws, including sanctions or other trade restrictions that are applicable to their operations.

**Anti-corruption:** Business partners shall adhere to both national and international corruption and bribery laws. Business partners shall not engage in or tolerate any form of corruption, neither directly nor indirectly. Such practices include the offering or accepting of any kind of reimbursement from actual or potential business partners that could affect the objectivity in the business transactions.

**Money-laundering:** Business Partners shall not accept, facilitate or support money laundering.



**Conflicts of interest:** Business partners shall not engage in business decisions where there could be an actual or perceived conflict of interest. Private or other business interests shall not influence, or appear to influence, the business partners' judgement or actions, whether directly or through someone closely related. If such a situation should arise, the business partner is expected to notify the Stena Metall Group immediately.

**Confidentiality and data privacy:** When entrusted with confidential information from the Stena Metall Group, business partners shall safeguard this information and protect it from misuse or improper disclosure. This includes both business information and any personal information related to individuals. Applicable data privacy laws and contractual terms shall be respected.



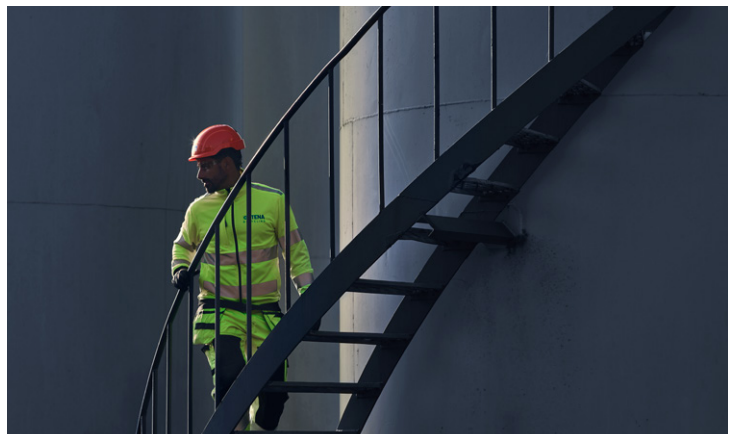
## HUMAN RIGHTS AND WORKING CONDITIONS

**Human rights:** Business partners are expected to support and respect the principles of the Universal declaration of Human Rights as well as the International Labour Organizations's Declaration on Fundamental Principles and Rights at work.

**Child labour:** The Stena Metall Group does not tolerate child labour. Business partners shall always follow applicable laws and international standards regarding minimum working age.

**Forced labour:** The Stena Metall Group does not tolerate forced labour of any kind. Business partners shall not engage in any form of modern slavery or forced labour practices, including practices such as human trafficking, prison labour, illegal labour, or other kinds of worker exploitation.

**Health and Safety:** Business partners shall take adequate measures to prevent accidents and provide a safe workplace for all employees and other workers, at minimum in accordance with applicable laws and industry standards. Employees and other workers shall be given proper instructions regarding safety procedures. Business partners shall strive for continuous improvements in the working environment.



**Non-discrimination and fair treatment:** Business partners shall treat all employees and other workers with equal respect, without distinction or discrimination on the grounds of gender, transgender identity, age, national or ethnic origin, disease or disability, religion and sexual orientation or any other characteristic protected by applicable law. Business partners shall not tolerate any kind of employee harassment or abuse, whether verbal or physical.

**Fair labor practices:** Business partners shall always meet at least the legal and industry minimum standard regarding worker rights and wages in each country of operation. This includes laws and standards regarding fair wages and benefits; working hours; annual, sick and parental leave; and freedom of association and collective bargaining.



## ENVIRONMENT

**Environmental impact:** Business partners shall at minimum comply with all environmental legislation and permits that are applicable to their operations. A precautionary approach to environmental risks shall be adopted. Business partners are also encouraged to continuously reduce their environmental impact. Such measures include reduced consumption of energy, water and other resources, as well as working to reduce waste levels, emissions, and other discharges to air, sea or land.

**Waste treatment:** Business partners who receive waste from the Stena Metall Group shall always handle it in compliance with national and international environmental laws and standards, as well as with general respect to human health and environment. The business partner shall hold all legally required environmental permits and licences that are applicable to their type of operations. Upon request by the Stena Metall Group or any of its subsidiaries, such documents shall be presented.

## CONCERNS OR QUESTIONS

Any concerns or questions regarding the Business Partner Code of Conduct can be raised to the business partner's contact person within the Stena Metall Group.