

2023

Supplier Code of Conduct



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Management's commitment

The Lebronze alloys group is a world leader in high-speciality copper metallurgy, whose raison d'être, enshrined in our articles of association, is to:

"Consolidate expertise in the production and recycling of metal alloys, mainly copper- and nickel-based, to provide a responsible response to the technical and environmental challenges faced by user industries."

At Lebronze alloys, achieving this responsibly means implementing a sustainable development policy called "B.R.O.N.Z.E" which is based on 6 pillars, Sustainable Development Goals (SDGs) that we have set ourselves as part of our membership of the United Nations Global Compact. Lebronze alloys is also a signatory of the Supplier Relations and Responsible Purchasing Charter.

As such, Lebronze alloys is committed to respecting fundamental values in the areas of human rights, labour law, environmental practices, responsible purchasing and business ethics, both within Lebronze alloys and in its commercial relations.

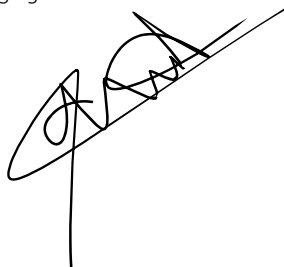
The "Supplier Code of Conduct" is a structuring document of the "Responsible Purchasing" policy and formalises the Group's CSR expectations in the context of its contractual relations with its Suppliers of goods and/or services, and its subcontractors (hereinafter referred to together as "Suppliers").

As the Group's Suppliers, you play a key role in driving the sustainable growth of our company, since inputs are the main source of carbon emissions. As part of its commitment to the climate, Lebronze alloys plans to reduce its indirect greenhouse gas emissions (Scope 3) by 25% in absolute terms between 2021 and 2030, in line with the "Science Based Target", which aims to limit global warming to 1.5°.

Because the success of the objectives set out in the 2015 Paris Climate Agreement depends on collective action, Lebronze alloys strongly encourages its Suppliers to commit themselves to a low-carbon path, and to work with Lebronze alloys to identify and analyse opportunities for continuous improvement in all areas of Social and Environmental Responsibility.

For Lebronze alloys, meeting these requirements and expectations is a decisive criterion in the choice and implementation of its business relationships.

Alexandra Dumont Nubery,
Managing Director



Respect for human rights and working conditions

In line with principles 1 to 6 of the United Nations Global Compact, Lebronze alloys asks all its Suppliers to respect the following commitments:

- 1 Promote and respect the protection of international human rights law,
- 2 Make sure you are not complicit in human rights abuses,
- 3 Respect freedom of association and recognise the right to collective negotiation,
- 4 Contribute to the elimination of all forms of forced or compulsory labour,
- 5 Contribute to the effective abolition of child labour,
- 6 Contribute to the elimination of all discrimination in employment and occupation.

1 / RESPECT FOR HUMAN RIGHTS

Lebronze alloys has adopted a Code of Ethics and Conduct for its employees and collaborators (hereinafter referred to as "Employees") and requires the same commitment from its Suppliers in terms of respect for human rights (as described in the

Universal Declaration of Human Rights), and respect for labour law (as described in the applicable Labour Code and in the fundamental conventions of the International Labour Organisation).

2 / PROHIBITION OF CHILD LABOUR

Suppliers must ensure that they do not use child labour. The term "child" means any person under the legal minimum age for admission to employment in

the country where the work is performed, or the minimum age for admission to employment as defined by the International Labour Organisation, whichever is higher.

3 / BAN ON FORCED LABOUR

Suppliers must prevent involvement in all forms of modern slavery, including human trafficking and forced, bonded or indentured labour.

Suppliers must not demand fees, recruitment costs or deposits from Employees, directly or indirectly, as a precondition for work.

4 / COMPLIANCE WITH REGULATIONS CONCERNING WORKING HOURS AND PAY

Suppliers must provide all Employees with a written employment contract in a language they understand, clearly setting out their rights and responsibilities with regard to wages, working hours, benefits and other terms and conditions of employment.

Suppliers must comply with the applicable laws and regulations concerning working hours and rest days and must guarantee all their Employees an appropriate and regular salary that complies with the regulations in force.

5 / PROHIBITION OF HARASSMENT AND DISCRIMINATION

Lebronze alloys expects its Suppliers to treat their Employees with dignity and respect.

Suppliers must ensure that their Employees benefit from a working environment free from moral and/or sexual harassment, intimidation or other abusive behaviour.

Suppliers must offer equal employment opportunities to Employees and applicants for employment, without discrimination, and comply with all laws and regulations relating to non-

discrimination.

No form of discrimination may be practised, whether on grounds of origin, gender, sexual orientation, gender identity, age, marital status or pregnancy, membership or non-membership, real or assumed, of an ethnic group or nation, trade union or mutualist activities, religious beliefs, physical appearance, state of health, loss of autonomy or disability, etc.

6 / SOCIAL DIALOGUE AND FREEDOM OF ASSOCIATION

Suppliers must respect the right of Employees to associate freely and to communicate openly with management about working conditions without fear of harassment, intimidation, sanction, interference or reprisal.

Suppliers shall recognise and respect any right of Employees to exercise rights of free association, including the right to join or not to join any association of their choice within the appropriate national legal framework.

7 / COMPLIANCE WITH APPLICABLE HEALTH AND SAFETY

Lebronze alloys expects its Suppliers to comply with the various health and safety standards and regulations. More specifically, they must provide their Employees with a working environment that complies with these health and safety standards, and provide the necessary equipment and training to contribute to their safety.

Lebronze alloys recommends putting in place a

health and safety management system (e.g. ISO 45001 or equivalent) including policies to protect the health, safety and welfare of people likely to be affected by their activities.

Finally, Suppliers must report any accidents or unsafe situations that may occur or may be detected in the course of their business relationship with Lebronze alloys.

Taking into account the environmental impact of our activities

In line with principles 7 to 9 of the United Nations Global Compact, Lebronze alloys asks all its Suppliers to respect the following environmental commitments:

- Apply the precautionary approach to environmental problems,

- Take initiatives to promote greater environmental responsibility,
- Encourage the development and dissemination of environmentally-friendly technologies.

1 / ENVIRONMENTAL RISK MANAGEMENT

Lebronze alloys requires its Suppliers to conduct their business in a manner that anticipates and actively manages environmental risks throughout their operations, products and supply chain.

Lebronze alloys recommends implementing an environmental system (e.g. ISO 14001 or equivalent)

2 / CLIMATE IMPACT, LOW-CARBON TRAJECTORY

Lebronze alloys requires all its Suppliers to continuously minimise their greenhouse gas emissions in line with the Paris Climate Agreement, which aims to limit global warming to 1.5 degrees and achieve a carbon-neutral world by 2050.

Lebronze alloys has set itself a target of reducing its CO² emissions by 50% between 2018 and 2030 for Scopes 1 and 2 and a 25% reduction between 2021

and 2030 for Scope 3. These 2 objectives and the associated action plans have been validated by the Science Based Target Initiative.

Lebronze alloys is therefore asking its Suppliers to support it in this approach by communicating the necessary data in a transparent manner, by proposing innovative solutions, and by using products or services with a low carbon footprint or an optimised life cycle.

3 / ENERGY OPTIMISATION

Lebronze alloys expects its Suppliers to implement measures to improve their own energy efficiency and to offer Lebronze alloys the most energy-efficient solutions.

Lebronze alloys recommends implementing an energy management system (e.g. ISO 50001 or equivalent)

4 / OPTIMISING NATURAL RESOURCES AND BIODIVERSITY

Lebronze alloys expects its Suppliers to optimise and limit the use of natural resources. In particular, Suppliers must protect natural

ecosystems and put an end to any degradation of the latter. This means implementing responsible environmental management practices.

5 / EMISSIONS AND WASTE MANAGEMENT

Lebronze alloys expects its Suppliers to control the emissions and discharges associated with their activities.

Lebronze alloys encourages measures to limit

the production of waste, particularly hazardous waste, and to implement all forms of reuse and recycling.

6 / RECYCLED PURCHASING STRATEGY

An important objective of responsible purchasing is to increase purchases of recycled metals as an alternative to new metal purchases, with the aim of achieving an 80% share of recycled metals by 2025 and 85% by 2030.

Lebronze alloys encourages its Suppliers to develop offers that meet this need.

7 / RESPECT FOR LOCAL COMMUNITIES

Suppliers involved in operations in areas inhabited by ethnic minorities or indigenous populations are

asked to respect the rights of local communities through initiatives and ongoing dialogue.

Taking into account the regulatory requirements concerning products

1 / PRODUCT REGULATIONS

Lebronze alloys asks its Suppliers to comply with the regulations in force concerning product safety and market access (such as the REACH regulation

in Europe). It attaches great importance to knowing and controlling the toxicological impact of the products it uses.

2 / TRACEABILITY OF PRODUCTS AND THEIR ORIGIN

Lebronze alloys asks its Suppliers to ensure the lawful origin of the materials and products delivered and their proper traceability, in particular with regard to raw materials.

Lebronze alloys refuses to buy products from the high-risk jurisdictions established by the FATF, and the non-cooperative countries and territories for tax purposes established by the European Union.

Lebronze alloys refuses to buy products that are derived, in whole or in part, from minerals or materials from conflict zones (Conflict Minerals) and countries subject to sanctions.

Ethical business practice

In line with principle 10 of the United Nations Global Compact, Lebronze alloys asks all its

Suppliers to take action against corruption in all its forms.

1 / THE FIGHT AGAINST CORRUPTION

Lebronze alloys condemns all forms of corruption involving its Employees and Suppliers, in accordance with the Sapin 2 law on the fight against corruption.

the legal provisions applicable in the countries in which they operate.

The maintenance of Lebronze alloys' relations with its Suppliers shall be subject to the condition that the latter refrain from any act of corruption or money laundering, or any other violation of

When it comes to gifts and invitations, the rule of transparency applies in all circumstances: gifts received or offered in the context of business relationships are reported to line management and are subject to authorisation in accordance with the terms of the Lebronze alloys policy in force.

2 / COMBATING CONFLICTS OF INTEREST

Lebronze alloys prohibits all situations of conflict of interest involving its Employees and Suppliers. A conflict of interest is a situation in which a person or entity has personal or financial interests that

could compromise their objectivity, impartiality or judgement in the exercise of their duties or responsibilities.

3 / COMPLIANCE WITH COMPETITION RULES

Lebronze alloys is required to comply with competition regulations, in particular as regards the prohibition of any agreement, concerted practice or abuse of a dominant position on the market concerned. It makes the same demands of its Suppliers.

In particular, Lebronze alloys establishes

procedures to ensure that Suppliers are treated equally. It ensures that purchasing decisions are based on an objective and comparative assessment of the integrity and reliability of Suppliers, their prices, services, CSR commitments, quality, performance, delivery times and the suitability of the services offered.

4 / COMPLIANCE WITH INTERNATIONAL REGULATIONS ON EXPORT CONTROLS

Lebronze alloys expects its Suppliers to comply with national and international regulations on

the control of exports of goods and data.

5 / PROTECTING SENSITIVE INFORMATION: INTELLECTUAL PROPERTY, BUSINESS SECRETS AND PERSONAL DATA

Lebronze alloys makes respect for intellectual property, the protection of business secrets and the confidentiality of personal data one of its priorities. Information communicated by Suppliers will be treated with all due

confidentiality and used only for authorised purposes.

Lebronze alloys expects its Suppliers to take the same measures.

6 / TRANSPARENCY AND PUBLICATION OF INFORMATION

Lebronze alloys has legal and contractual obligations in terms of transparency and the publication of non-financial information.

Lebronze alloys therefore expects its Suppliers

to comply with these requirements in their contractual relations with Lebronze alloys and with their own contacts.

Measures for monitoring, reporting and sanctions

1 / AUDIT

Lebronze alloys reserves the right to audit its Suppliers, either by its own means or through appointed auditors, in order to verify that the above principles and rules are taken into

account. Suppliers undertake to provide all the information requested in good faith.

2 / CERTIFICATIONS

Lebronze alloys asks its Suppliers to obtain and/or work towards the following certifications, studies and commitments:

- Certifications: ISO 14001, ISO 45001, ISO 50001, etc.

- CSR labels: Ecovadis, Bcorp, etc.
- Studies: Carbon footprint, CSR report, etc.
- Commitments: Sustainable development/QSE policy, Code of ethics/Code of conduct, etc.

3 / SUPPLIER SUPPORT

Lebronze alloys is convinced of the virtues of these provisions for improving its performance and that of its Suppliers, and is aware of the efforts that still need to be made by some of them to comply with the principles and values of this document.

With this in mind, Lebronze alloys is ready to support, as far as it is able, Suppliers who are committed to progress.

4 / ALERT PROCEDURE

Lebronze alloys asks its Suppliers to report to it any elements that may violate a law, regulation or principle described in this Code of Conduct,

and/or that may be related to the fight against corruption or influence peddling.

5 / SANCTIONS FOR NON-COMPLIANCE WITH THE CODE OF CONDUCT

In the event of proven non-compliance with the principles set out in this Code of Conduct, Lebronze alloys reserves the right to suspend or terminate

all commercial relations with the Supplier, without the Supplier being entitled to any compensation.

Supplier commitment

This Supplier Code of Conduct forms an integral part of any contract between Lebronze alloys and its Suppliers. Lebronze alloys expects its Suppliers to apply the principles and values described in this Code of Conduct to their value chain.

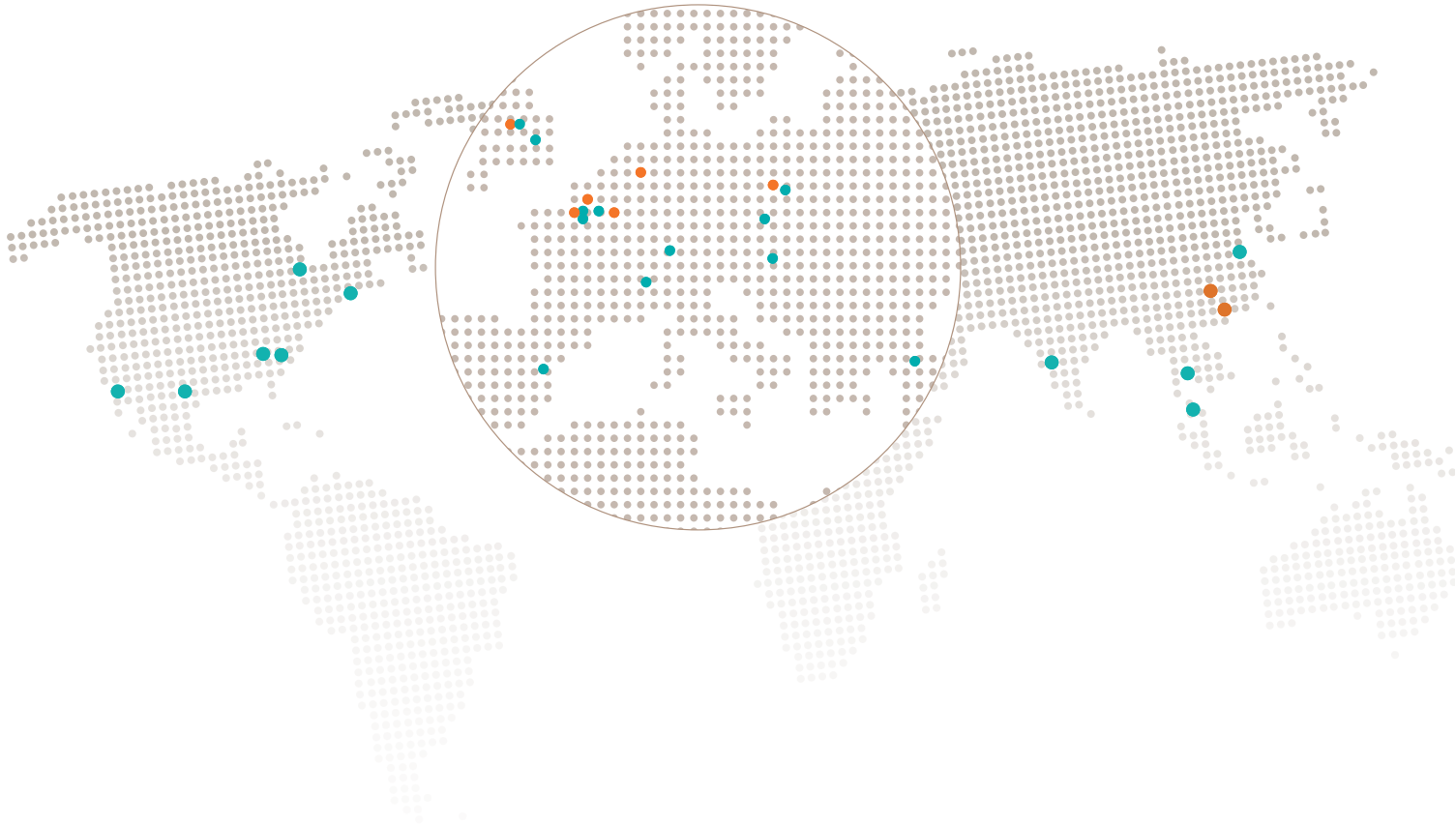
By signing this Supplier Code of Conduct, the Supplier acknowledges having read and accepted the principles set out herein.

Supplier's company name	Name and position of authorised signatory	Date	Signature



lebronze alloys

World leader in special high-performance copper and nickel alloys



● Lebronze alloys Factories and Service Centers ● Distributor partners

Lebronze alloys Group is a world leader in the development and fully integrated production of high-performance specialty copper and nickel alloys.

Thanks to a multidisciplinary know-how, the Group provides innovative solutions to all major industries such as Aeronautics, Electronics, Space, Automotive, Energy, among others.

Our 6 production facilities and 750 employees manage a unique range of metal processing technologies: continuous and semi-continuous casting, extrusion, hot and cold rolling, drawing, open-die forging, hot stamping, closed-die forging, cold forming, machining, non-destructive testing, etc.

We are a major decarbonation player for many industries. We continually strive to reduce our carbon footprint and our products are key for decarbonation applications in our customers' industries.

The Group's commitment is to find appropriate and optimized solutions for every sector's requirements.



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