SAMA
Sama Aluminium

Sama Aluminium Code of Conduct for Suppliers

Sama Aluminium, Ltd. ("Sama") is committed to becoming a global company that carries out its roles and responsibilities as a member of global society. We strive to provide sustainable solutions that can contribute to resolving social/environmental problems, while endeavoring to adhere to the basic principles of sound business growth.

We have established the "Sama Aluminium Code of Conduct for Suppliers" based on international norms, standards and legal requirements such as RBA Code, Universal Declaration of Human Rights, SA8000, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to fulfill our social responsibilities at the global level and to achieve sustainable performances. We particularly expect mutual support from our supplier (the "Company") to comply with the following standards.

Human Rights and Labor

1. The Company does not hire any person below the legal working age, and complies with the legal requirements for juvenile labor regarding minimum age, working hours and working conditions.
2. The Company prohibits all forms of involuntary labor, including forced labor, labor exploitation, and establishes employment contracts that clearly define the working conditions in the employees' native languages.
3. The Company prohibits all forms of discrimination such as race, skin color, age, gender, sexual orientation, place of origin, physical disability, pregnancy, religion, political views, labor union membership or marital status in terms of employment, promotion, remuneration, educational opportunities, etc.
4. The Company respects the human rights of all employees, and effectuate humane working circumstance by prohibiting any sexual harassment, abuse, punishment, psychological or physical coercion, violent language, etc.
5. The Company abides by all legal requirements related to maximum working hours, days of work, minimum wage, welfare and remuneration, etc.
6. The Company respects the employee's right to have association and collective bargaining in accordance with local laws and regulations. Employees can communicate with the management with regard to their working conditions without any risk of discrimination, retaliation, threats or harassment.

Business Integrity

The Company maintains the highest level of integrity in all transactions and relations, and strictly prohibits any types of corruption including undue acquisitions of improper advantages or bribery, while fully complying with all legal requirements related to anti-corruption. The Company also guarantees confidentiality and protection of whistle-blowers.

Health and Safety

The Company must comply with legally mandated precautionary measures, including evaluating and eliminating hazardous matters, providing regular education and emergency trainings, disseminating personal protective equipment, etc., to ensure that employees can work and live (if accommodation is provided) in a safe and healthy environment.

Environment

All required environmental permits, approvals, and registrations shall be obtained and maintained in the most recent versions. The Company shall devote utmost efforts to minimize the adverse impact of its manufacturing process on the environments and local community, such as hazardous substances, solid waste, waste water, air emissions, resource reduction, etc.

Management System

The Company should comply with laws and regulations regarding corporate activities and products, as well as striving to identify and mitigate underlying management risks related to this Code.

Responsible Mineral Sourcing

The Company shall prohibit the use of *Relevant Minerals sourced through any illegal or unethical processes which result in human rights abuses, war crimes or other serious violations of international humanitarian law, crimes against humanity, and genocide.

Definitions

Relevant Minerals	Conflict minerals (i.e., tin, tantalum, tungsten, gold), minerals mined in Conflict-Affected and High-Risk Areas
Conflict-Affected Areas	Democratic Republic of the Congo, Sudan, Rwanda, Burundi, Uganda, Congo, Zambia, Angola, Tanzania, Central African Republic
High-Risk Areas	Areas of severe human rights repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence (including Xinjiang Uyghur region)