



Outokumpu Human Rights Policy

1 Purpose and scope

This Human Rights Policy defines Outokumpu Group's commitment to respect all internationally recognized human rights and provides a framework for embedding these principles across our operations and value chain. It identifies the most significant human rights impacts linked to our business activities and explains how we address them through a structured due diligence process, in line with international standards such as the UN Guiding Principles on Business and Human Rights.

2 Applicability

This Policy must be followed globally by all Outokumpu businesses, companies, directors, officers, and employees. In addition, Outokumpu expects its business partners across the value chain to follow similar standards as outlined in this Policy. Related principles and expectations regarding our suppliers are defined in Outokumpu's Supplier Code of Conduct. Our general principles and goals across environmental, social, and economic aspects are outlined in Outokumpu's Sustainability Policy, providing framework and guidance for our employees and business partners. Furthermore, Outokumpu's Code of Conduct sets the foundation for our ethical behavior and compliance across all operations.

3 Guiding Human Rights Principles at Outokumpu

- **Respecting Human Rights** – We uphold and promote internationally recognized human rights across our operations and value chain and expect the same commitment from all our business partners.
- **Complying with Laws and Standards** – We follow all applicable laws and adhere to global human rights frameworks.
- **Conducting Due Diligence** – We identify, prevent, mitigate, and remediate adverse human rights impacts through a risk-based due diligence approach as part of our decision-making processes.
- **Enabling Grievance and Remedy** – We provide accessible grievance channels and ensure fair and effective remediation.
- **Engaging Stakeholders** – We maintain meaningful dialogue with communities and vulnerable groups to address the identified impacts.
- **Ensuring Accountability** – We uphold strong governance, training, and continuous improvement in our human rights practices.

4 Our Commitment to Global Human Rights Standards

Outokumpu is committed to conducting its business with integrity, respecting and promoting internationally recognized human rights, and operating in a safe, sustainable, and ethical manner. We acknowledge our responsibility to prevent, mitigate and, where necessary, remediate human rights impacts connected to our own operations and our value chain, including impacts on affected communities. Outokumpu expects its employees, business partners, and other parties whose impacts may be directly linked to our operations, products, or services to respect and not infringe upon human rights.

We comply with all applicable laws and regulations related to human rights and human rights due diligence in every jurisdiction where we operate. We adhere to internationally recognized human rights standards, including *the United Nations Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the European Convention on Human Rights, and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work.*

As signatories to the *United Nations Global Compact*, we adhere to its Ten Principles on human rights, labor, environment, and anti-corruption, and support the achievement of the UN Sustainable Development Goals (SDGs). In addition, we are committed to the *United Nations Guiding Principles on Business and Human Rights* and the *OECD Guidelines for Multinational Enterprises*, which guide our approach to responsible business conduct and human rights due diligence. We also follow relevant UN frameworks that protect the rights of vulnerable groups, including women, children, migrant workers, and indigenous peoples.

5 Governance and Accountability for Human Rights

Human rights governance at Outokumpu is overseen by the Board of Directors, the CEO holding the highest level of oversight and accountability for human rights at Outokumpu. Human Rights governance is integrated into our sustainability and risk management processes. Implementation of group-wide human rights due diligence process is managed by relevant business functions, supported by Head of Human rights. The Supplier Sustainability team is responsible for leading human rights due diligence within Outokumpu’s raw material supply chains, which constitute some of the highest-risk areas of our business.

We ensure accountability through clear policies, training, grievance mechanisms, and regular monitoring of our operations and supply chain. This policy is approved by Outokumpu’s senior management.

6 Understanding Our Salient Human Rights Impacts

We recognize that certain human rights issues are particularly salient to our business due to the nature of the stainless steel industry and our global footprint.

Outokumpu’s operations have been established in specific locations, where they may have human rights and environmental impacts on surrounding local communities. Furthermore, sourcing raw materials from areas with heightened human rights risks can affect both workers and local communities, including indigenous peoples.

We have identified the following salient human rights impacts related to our own operations and upstream value chain, based on assessment criteria that consider the scale, scope, and irremediability of each impact, as well as the likelihood of occurrence. Outokumpu works proactively to prevent, mitigate, and address these potential and actual adverse impacts.

Salient human rights impacts related to Outokumpu’s own operations and value chain

Occupational health & safety	Reasonable working hours
Gender equality & equal pay	Adequate living income and wage
Discrimination & harassment	Migrant workers
Freedom of association & collective bargaining	Adverse impacts on biodiversity including deforestation, impacts on water, air, and soil, and its impacts on communities



Principles Addressing Our Salient Human Rights Impacts

- **Health & Safety:** We are committed to ensuring a safe and healthy working environment for all employees, contractors, and visitors, recognizing this as a fundamental human right. We focus on prevention, continuous improvement, and active employee involvement to promote well-being and prevent harm. We comply with - and expect all employees, suppliers and subcontractors to follow - all applicable national and local regulations on safety and our safety rules. This includes measures to prevent potential impacts on communities near our operations and throughout the supply chain. For detailed principles and practices, see Outokumpu's Health & Safety Policy.
- **Gender equality & equal pay:** We are committed to treating all individuals fairly and equally in line with international human rights standards. We uphold equality in recruitment, career development, compensation, opportunities, and termination, ensuring that gender does not influence pay or professional growth.
- **Discrimination & harassment:** We are committed to fostering a workplace where everyone is treated with dignity and respect. We prohibit threats or the use of disciplinary practices that undermine their dignity. We do not tolerate any form of discrimination, intimidation, or harassment – whether verbal, psychological, physical, or sexual – nor any abuse at work, including humiliating treatment or physical punishment.
- **Adequate living income and wage:** We respect the right to an adequate living income and wage. We ensure that all employees receive compensation that not only meets legal requirements but also supports a decent standard of living, in line with international principles on fair pay and living wages.
- **Reasonable working hours:** We are committed to implementing working time practices that support health, safety, and overall well-being. We comply with all applicable local regulations and align with internationally recognized standards on working hours, overtime, breaks, rest periods, and leave. Our working time arrangements are designed to prevent excessive hours and reduce fatigue.
- **Freedom of association & collective bargaining:** We respect and uphold the right of employees to freely associate and engage in collective bargaining, in accordance with local laws and international conventions such as the ILO standards. Employees have the right to join or form trade unions, workers' councils, or other representative bodies and to participate in collective negotiations without fear of retaliation or discrimination.
- **Migrant workers' rights:** We recognize migrant workers as a potentially vulnerable group and are committed to respecting and protecting their rights and dignity across our operations and value chain. We do not tolerate any form of exploitation or abuse of migrant workers, including excessive recruitment fees, confiscation of identity documents or passports, restrictions on freedom of movement, or withholding of wages. We work to ensure that migrant workers have equal access to fair employment terms, safe working conditions, and grievance mechanisms, and that they are treated with respect and without discrimination.
- **Adverse impacts on biodiversity including deforestation, impacts on water, air, and soil, and its impacts on communities:** We recognize that a clean, healthy, and sustainable environment is an essential human right. Outokumpu is committed to protecting biodiversity and ecosystem services, managing natural resources responsibly, and minimizing adverse impacts such as deforestation and pollution of air, water, and soil. We take proactive measures to limit environmental harm and safeguard communities affected by our operations directly or indirectly.

7 Our Broader Human Rights Commitments

In addition to addressing our most salient human rights impacts, we uphold a comprehensive set of principles that guide our actions. These commitments reflect internationally recognized human rights standards and cover areas where our operations and relationships may influence people and communities. They demonstrate our respect for civil, political, economic, social, cultural, and environmental rights and our commitment to provide access to effective grievance mechanisms and remedies for those affected. They also reinforce our responsibility to uphold these fundamental rights across our own operations and business relationships, with special focus on vulnerable groups such as children, women, migrant workers, persons with disabilities, local communities, indigenous peoples, and other minorities.

- **Zero tolerance for forced labor and modern slavery** – We condemn all forms of forced or bonded labor, modern slavery, human trafficking and debt bondage. Outokumpu does not accept the use of forced or bonded labor or any form of modern slavery within its own operations nor in its value chain. We do not tolerate human trafficking or practices such as restrictions on freedom of movement, recruitment fees, confiscation of identity documents or passports, debt bondage or withholding of wages.
- **Protecting children's rights** – We are committed to preventing child labor in all its forms and do not permit or tolerate child labor in our own operations or anywhere in our value chain, without exception. We require compliance with applicable national laws and international standards on minimum working age and actively monitor and engage with our partners to uphold this commitment.
- **Respect for community and indigenous people's rights** – We are committed to respecting the rights of local communities and indigenous peoples by minimizing adverse impacts and contributing positively to their economic and social well-being. For indigenous peoples, we uphold to protect their rights as outlined in *the Indigenous and Tribal Peoples Convention, 1989 (No. 169)* and *the United Nations Declaration on the Rights of Indigenous Peoples*. This includes, but is not limited to, their right to land and their right to free, prior, and informed consent (FPIC) when activities involving exploration or resource use on their lands are considered or undertaken.
- **Avoiding contribution to conflict or instability** – We are committed to respect human rights and public freedoms regarding internal and external security arrangements.
- **Right to privacy and data protection** – We safeguard personal data and respect privacy in all our business practices.
- **Recognition of human rights defenders** – We acknowledge the role of human rights defenders and condemn any retaliation or harm against them.

8 Our Approach on Human Rights Due Diligence, Grievance, and Remedy

As part of the corporate decision-making process, Outokumpu undertakes risk-based human rights and environmental due diligence in accordance with the *United Nations Guiding Principles on Business and Human Rights*. Through this process, we identify and assess adverse impacts that arise from our own operations and those in our value chain to measure, prevent and mitigate them respectively.

We maintain accessible and confidential channels for employees, suppliers, and external stakeholders, including affected communities, to raise their concerns. Our anonymous whistleblowing channel, *SpeakUp*, can be used by any stakeholder and is found on our website. We acknowledge our

responsibility to ensure that all our grievance mechanisms are fair, accessible, and transparent. We commit to investigating complaints promptly, taking corrective action where necessary and protecting whistleblowers from retaliation. We encourage our suppliers, their sub-suppliers and their employees to report any suspected violations or non-compliance directly to Outokumpu.

Grievance mechanisms serve as an entry point for enabling remedy, ensuring that concerns raised lead to fair and effective resolution of adverse human rights impacts. Outokumpu is committed to ensuring these impacts are addressed through fair and effective remediation processes that are legitimate, equitable, and transparent. When we identify that we have caused or contributed to harm, we take appropriate corrective actions and work to restore affected individuals or communities. In cases where impacts are linked to our operations, products, or services through business relationships, we use our leverage to encourage and enable remedy.

Meaningful dialogue with stakeholders is central to our human rights due diligence. We engage with communities near our operations and our suppliers to understand impacts, address concerns, and minimize risks, especially in regions with elevated human rights and environmental challenges. This includes considering the needs of vulnerable groups such as women, children, migrant workers, and indigenous peoples. Through open communication and collaboration, we aim to prevent adverse impacts and strengthen positive outcomes.

The Human Rights policy complements other Outokumpu policies and guidelines, such as the *Sustainability Policy*, *Code of Conduct*, *Supplier Code of Conduct*, *Health & Safety Policy*, *Policy on Working Time & Remuneration* and other applicable policies. This Policy is publicly available and communicated to all employees and relevant stakeholders. We review this Policy regularly and update it as needed to reflect evolving standards and stakeholder expectations.

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