

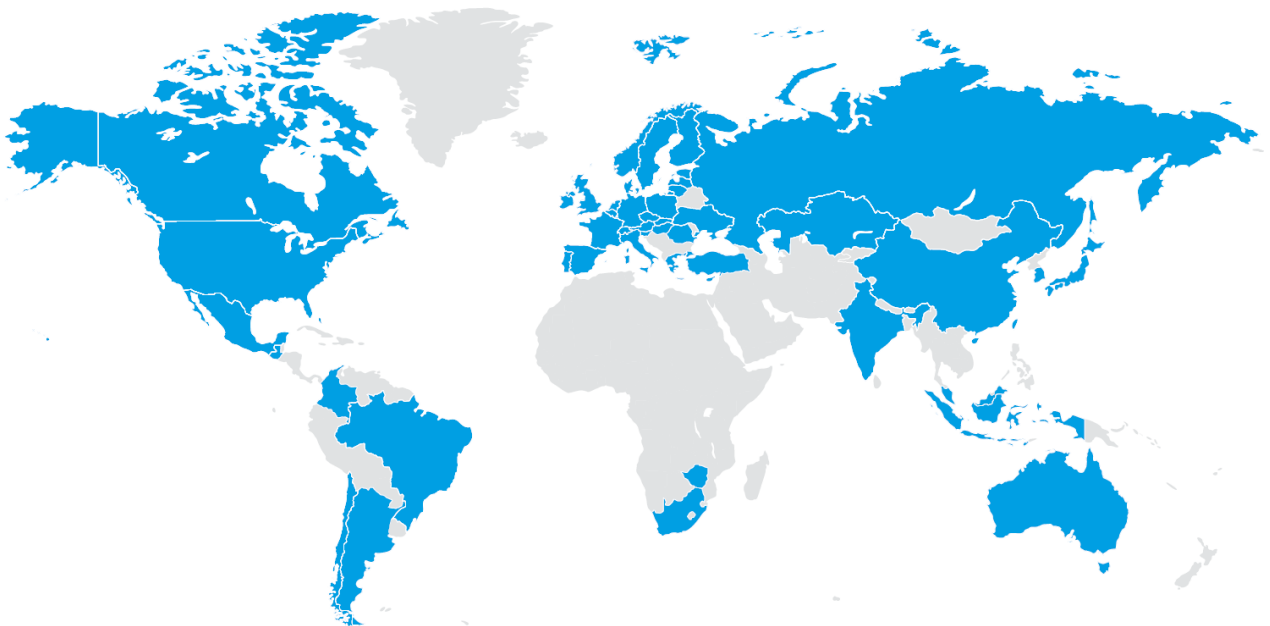


## MODERN SLAVERY ACT 2015

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### Statement on Modern Slavery Act 2015

Outokumpu Oyj is a stainless steel producer in Europe, the United States and Mexico with its own chromite ore mine and ferrochrome production in Finland. 93% of our suppliers are located in the same countries where our production sites are situated. The countries where our most important suppliers are located are shown in the following map.



Corporate responsibility is integrated into all our operations, activities and decision making, from the purchasing of the materials to production and logistics. Outokumpu's operations are guided by our Code of Conduct, Ethical Principles (human rights and dignity, corporate responsibility, good corporate citizenship and a safe and healthy workplace), Environment, Health & Safety and Quality Policy and our Policy on Corporate Responsibility.

We are committed to ensuring that modern slavery, forced and child labor and human trafficking plays no part in our supply chain or in any part of our business. Outokumpu complies with international, national, and local laws and regulations, and respects international agreements concerning human and labor rights, such as the United Nations' Universal Declaration of Human Rights, and condemns the use of forced and child labor. Outokumpu follows and supports the United Nations Global Compact.

Our Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our supply chain. There is zero tolerance for any kind of discrimination, whether it is based on ethnic origin, nationality, religion, political views, gender, sexual orientation, or age. Outokumpu expects that all suppliers and subcontractors must perform according to the laws and regulations of the countries they operate in and meet the Outokumpu Supplier Requirements and follow similar standards and principles as in the Outokumpu Code of Conduct. Suppliers and subcontractors must strictly condemn and prohibit the use of all forms of forced and compulsory labor and slavery, including child labor and human trafficking.

Over the years, we have established long-standing relationships with all our suppliers, and we make our requirements and expectations of responsible and ethical business behavior clear.

In 2019, 11 suppliers from general procurement were invited for a self-assessment and 11 suppliers were audited on site. The suppliers audited on-site were partially same suppliers who participated in the self-assessment. As a result, improvement opportunities and improvement requirements were identified and communicated to the suppliers. The supplier assessment is based on Outokumpu's supplier requirements and focused to evaluate suppliers' social and environmental responsibility, safety and quality management.

To date we have not been made aware of any human trafficking or modern slavery activities within our supply chain, but if any concerns are highlighted to us, we will act immediately in accordance with our legal and moral obligations. Outokumpu provides a communication channel SpeakUp on violation of our Code of Conduct. SpeakUp is an externally operated service enabling Outokumpu employees and external stakeholders to report serious breaches of the Outokumpu Code of Conduct. This can be done confidentially and, if desired, anonymously, 24/7 via a secure website. We are committed to a strict non-retaliation policy and do not tolerate retaliation against anyone who has reported a potential violation in good faith.



As part of our initiative to identify and mitigate raw material supplier risk, we commit to responsible sourcing and we exercise due diligence on the basis of the OECD Due Diligence Guidelines for Responsible Supply Chain. In 2019, we screened our direct material suppliers on the environmental, social, and governance (ESG) risks in countries of origin. The ESG country risk assessment was based on the following seven criteria: regulatory quality, rule of law and corruption from the World Bank, Environmental Performance Index, conflict minerals, child labor, and forced labor. The top 20 suppliers cover 80% of the total direct material spending. Six suppliers out of this group are located in countries with ESG risks. Those suppliers were requested for a self-assessment and all of the requested companies replied. Analysis of the self-assessments showed that no ESG risk was taken up in the answers. In 2020, we will start with audits of the top 20 suppliers also under ESG criteria.

The company regularly trains employees on the Code of Conduct, anti-corruption and other compliance topics.

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