

MODERN SLAVERY ACT 2015

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. 87% of our suppliers come from the same countries where our production sites are situated. The countries where our most important suppliers are located are published in our annual reports.

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. Outokumpu monitors its suppliers through self-assessment, screenings and audits. In addition, 60% of suppliers are going through a monthly compliance screening for sanctions. 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.

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 the Helpline, available on the company intranet and via the Internet, as a confidential contact and communication channel which allows employees and third parties to report suspected or observed misconduct, granting confidentiality and full privacy. The information can be forwarded anonymously for the attention of the Head of Internal Audit.

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.

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

Kari Tuutti
President, Long Products
Outokumpu

DOCUMENT IDENTIFICATION

Document approver: President - Long Products, UK
Document owner: Vice President Environment and Sustainability, Juha Ylimaunu

DOCUMENT HISTORY

First approval on February 19, 2019