



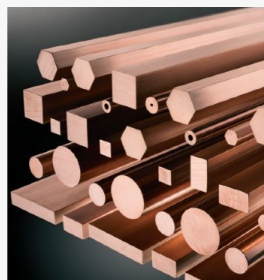
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the metal traders



metalcenter
Group



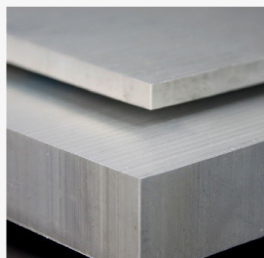
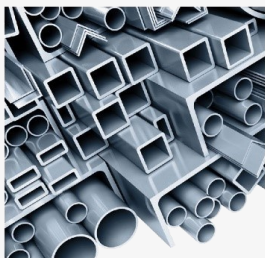
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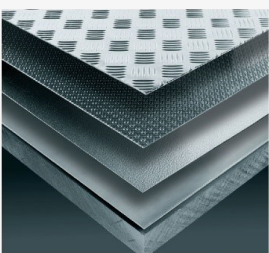
ALUMECO GROUP CSR REPORT

2020/2021

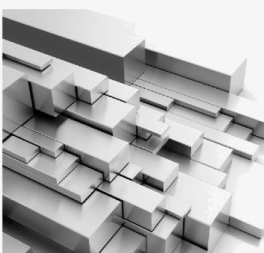
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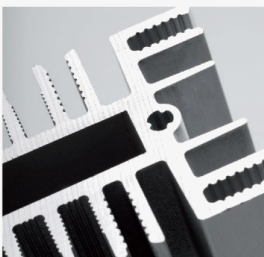
metalcenter
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ALUWIND



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alumeco
Group

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*For us **CSR** is not just a word. Going forward it is a crucial factor when we want to retain our good customers, our competent and loyal employees and sustain our business.*

| PREFACE |

In the world of business, it is increasingly important to have a clear and goal-oriented CSR policy. For the Alumeco Group this means that we will continuously take on responsibility and make demands on ourselves and our supply chain.

I am, therefore, very happy to be able to present the **Alumeco Group CSR Report 2020/2021**, in which we, for one thing, describe how far we have come with our actions and objectives within the Corporate Social Responsibility area and for another, which initiatives we plan to carry out for the Group in the coming period.

The Alumeco Group is founded on good, solid and healthy fundamental principles. Decency and credibility in our global activities are principles we cherish, and they apply to employee relations, environmental considerations and in relation to our business partners. It is important to us to be able to offer our employees a safe workplace in an environment where they thrive and develop. We strive towards extending our relationship with business partners with the purpose of achieving our supply chain CSR objectives.

Our international position is formed via innovative thinking, comprehensive investments and skilled employees – all built up around a foundation of good values. This also means that we are very conscious of our social responsibility.

The Alumeco Group's goal is to earn money in a responsible way. This is possible in our daily business activities because our **CSR strategy** ensures that all we do complies with our values and is beneficial for our stakeholders. We are, therefore, pleased to present an improvement in the financial year 2020/2021 within several areas, such as **business partners, climate and environment, employees and anti-corruption** - areas constituting an essential part of our CSR objectives.

We have established a Corporate Governance System embracing specific policies and principles to ensure the highest ethical standards within our own corporation and our business partner's. The past year we have once again increased the share of our purchase measured on volume and which **is subject to** our Supplier Code of Conduct, thus the share now amounts to 70%.

Compliance is playing an increasingly significant role, and consequently, we have intensified our efforts further to ensure full compliance with requirements and policies along with adding extra resources within this area. All of this because we take on responsibility.

I hope that this CSR report will offer an insight into the results that we have achieved in the past year and, at the same time, make it clear in which areas we will launch new initiatives to make the greatest possible difference to the environment and our highly valued employees, customers and stake-holders.

I wish you happy reading!

Odense, August 2021

A blue ink handwritten signature, appearing to be 'P. Johansen', written in a cursive style.

Per Thanning Johansen
Alumeco Group CEO

| BUSINESS MODEL |

THE ALUMECO GROUP

The Alumeco Group consists of Alumeco, Aluwind and Metalcenter and is today operating with three different areas of business.



Alumeco

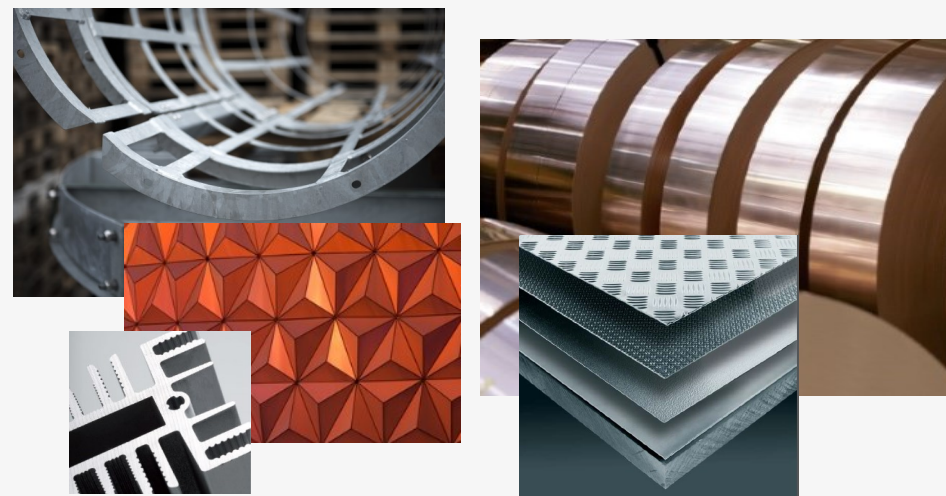
Alumeco A/S was founded as a wholesale business in 1983 in Denmark. Since then, Alumeco has developed from a small local Danish company to a large international business group providing aluminium and stainless steel to the metal-consuming industries and consumers around the world. The headquarters Alumeco A/S in Odense employ today around 226 employees and have approx. 40.000 m² of office- and warehouse/production buildings. The warehouse functions as central warehouse for a large part of the Alumeco Group. The other large Alumeco Group central warehouse is located in Coswig, Germany, and has a capacity of 17.000 m². Alumeco employs approx. 580 employees worldwide divided between 13 subsidiaries in Europe and China. Of these subsidiaries, Sweden, Finland, Poland and Lithuania have warehouse locations.

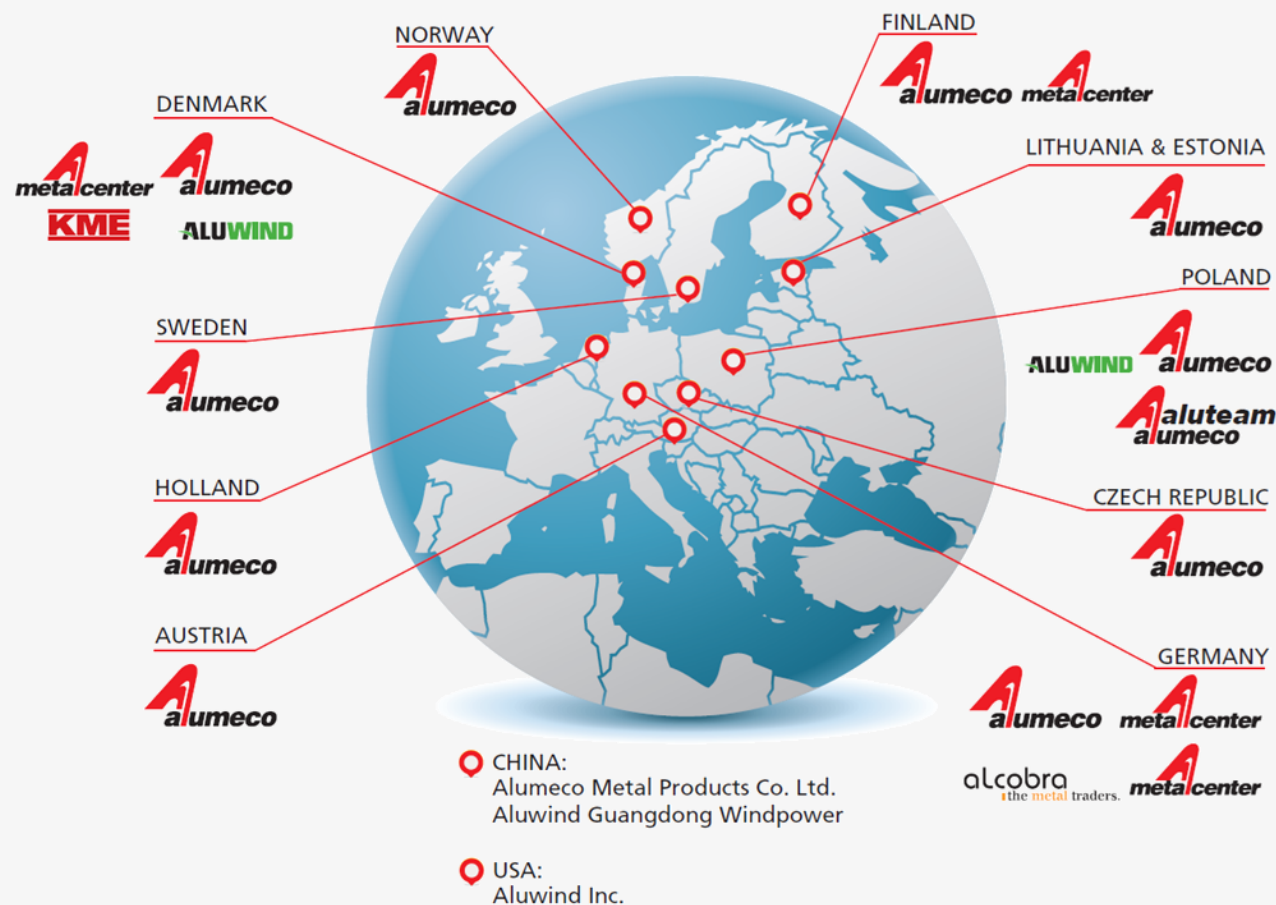
Metalcenter

Metalcenter Group A/S was founded as a wholesale business in 2009 and is fully integrated with Alumeco with joint warehouse, logistics, administration, etc. The Metalcenter Group A/S merged in February 2021 with Alumeco A/S with Alumeco as the continuing company. Metalcenter Group continues with the companies Metalcenter Group Oy in Finland, Metalcenter Group GmbH in Germany and KME Nordic A/S in Denmark. The Metalcenter Group employs 20 employees, and the focus is 100% on copper, brass and bronze - offering a commodity 'red metal' stock program as well as solutions such as customized parts, kits and assemblies.

Aluwind

Aluwind A/S was established as an independent make-to-order business in 2009 and after this, Aluwind Inc. in USA, Aluwind Guangdong Windpower in China and Aluwind Sp. z o.o. in Poland followed in 2010, 2011 and 2016, respectively. Today Aluwind has a total of approx. 406 employees working dedicatedly with the world's leading wind turbine manufacturers. Aluwind has its own production and warehouse setup and is in addition to this integrated with Alumeco A/S like Metalcenter Group.





Distribution of Alumeco Group companies, June 2021.

The Alumeco Group has built up our expertise through more than 35 years and thanks to committed and skilled employees, the Group is characterised by competent guidance and extensive in-house knowledge whether it comes to aluminium, stainless steel, red metals or wind turbine components.

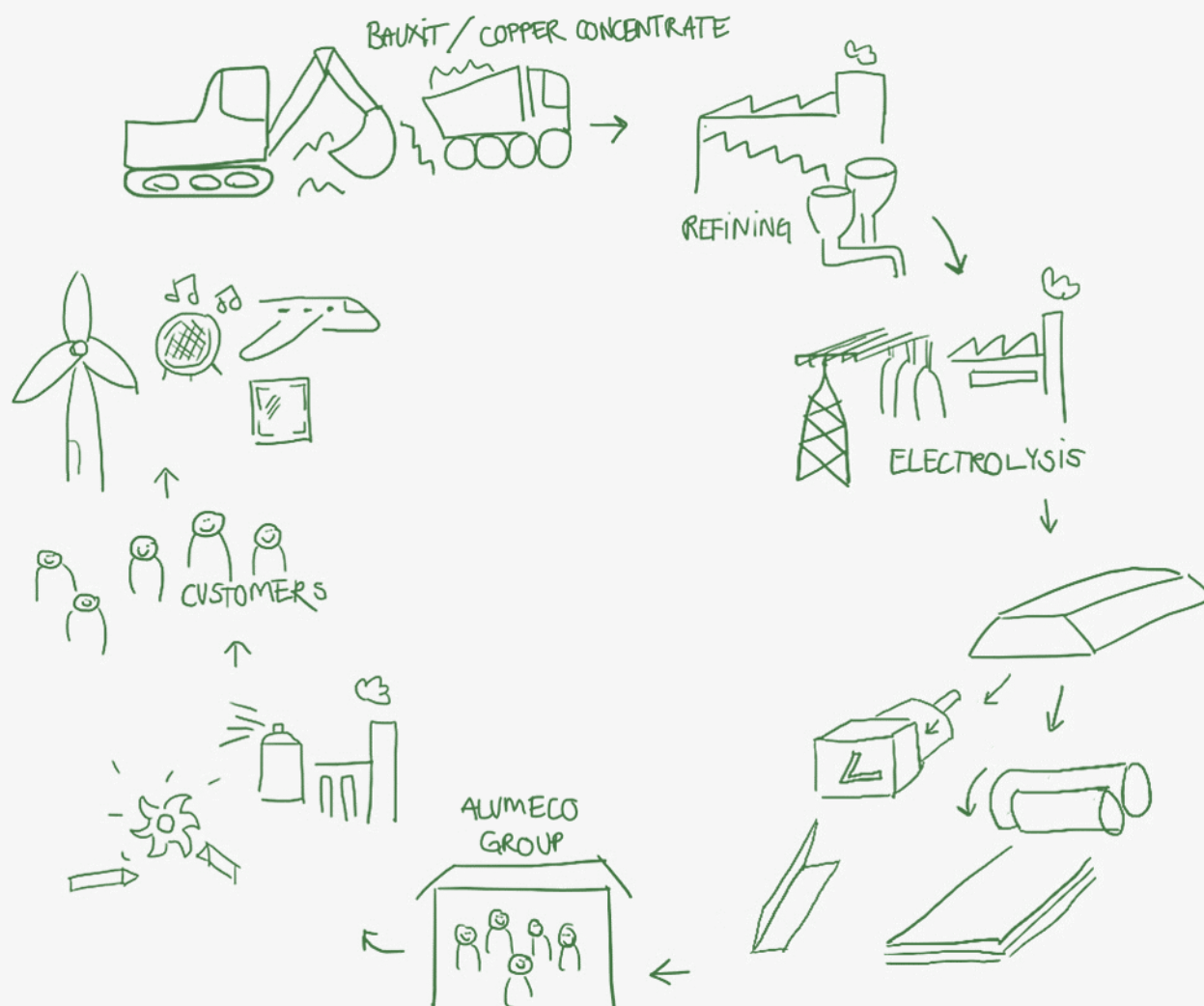
Being a global supplier and business partner and because of the Group's many subsidiaries in Europe, China and North America, the Group has a far-reaching international network.

Through comprehensive investments in the company's physical facilities as well as modern machinery and warehouse equipment, the Alumeco Group has one of Northern Europe's largest aluminium stocks, including red metals and stainless steel, with own coil centre and three fully automatic high rack systems at its disposal. On top of this, Aluwind has full-scale production in Poland and China. Our facilities enable us to meet the needs of our customers as well as the ongoing market development.

For additional information about the Alumeco Group, our products and services, please visit:

www.alumeco.com
www.metalcentergroup.com
www.aluwind.com
www.alcobra.de
www.metalcenter.de

ALUMINIUM AND COPPER SUPPLY CHAIN – ALUMECO GROUP:



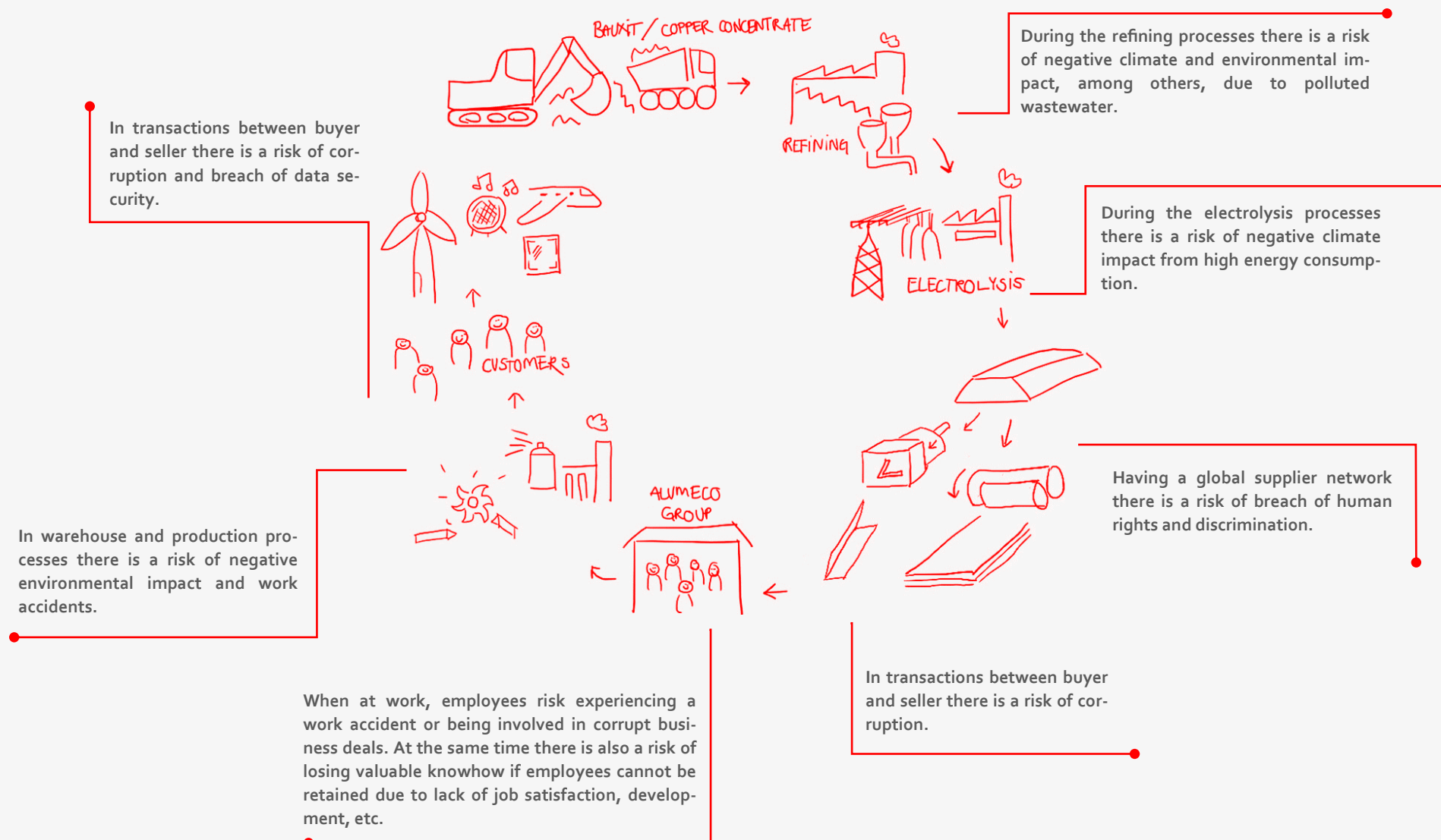
RECYCLING

FACTS ABOUT ALUMINIUM, COPPER, AND STEEL RECYCLING:

- ❏ Aluminium can be recycled infinitely with very little material waste.
- ❏ Recycled aluminium is very energy efficient as it only requires 5% of the energy used for the primary production.
- ❏ Approx. 50% of the EU demand for copper is met through recycling.
- ❏ Recycling copper uses up to 85% less energy than the primary production.
- ❏ Approx. 90% of steel is recycled.

Source: www.alumeco.dk, www.european-aluminium.eu and www.copperalliance.eu, csr-and-sustainability-report-2019.pdf (damstahl.dk)

| CSR RISK OVERVIEW IN THE SUPPLY CHAIN |



| CSR IN THE ALUMECO GROUP |

The objective with our CSR work is to create value for our stakeholders – customers, employees, suppliers as well as the surrounding community – and it is a natural match with our vision:

‘TO BE NO. 1 – by creating competitiveness for our partners’

as well as with our strategic core values:

‘Good Business Sense, Customer Focus & Dedication’

In the Alumeco Group our continued work with CSR has special focus on:



Business Partners



Climate & Environment



Employees



Anti-Corruption



Data Security

Within these five main areas, we believe that we have the possibility to work actively with our social responsibility by virtue of our business model and our position in the supply chain.

For each of the five main areas in this report we describe:

- Essential risks connected with the area
- The Alumeco Group policy to counteract and handle these risks
- Actions and results from working with these policies
- Our expectations to improvements for the coming period.

The Alumeco Group’s 2020/2021 CSR report covers, unless otherwise noted, the entire Alumeco Group and constitutes the statutory report about corporate social responsibility in continuation of the annual accounts of the Alumeco Group cf. the Danish Financial Statement Act 99a. The Alumeco Group includes Alumeco A/S and all affiliated companies.

The present report covers the Alumeco financial year running from July 1st 2020 to June 30th 2021.

| BUSINESS PARTNERS |

SUPPLIER EVALUATION & CODE OF CONDUCT

Essential risks

As an international metal supplier, the Alumeco Group has a global network of business partners. Our suppliers are primarily based in Europe and Asia. We assess that the risk of a business partner's or a previous/later supply chain link's breach of human rights, discrimination and child labour is present, however, we estimate the risk to be limited within the aluminium, red-metal, steel, and wind industry. To eliminate the possible risk, we strive towards ensuring that our most important suppliers act according to the Alumeco Group Supplier Code of Conduct.



Policy

- In the Alumeco Group we work on developing long-lasting collaboration with our suppliers characterised by mutual respect and loyalty. Our primary purpose is to ensure security of supply of central products.
- The Alumeco Group's purchasing strategy focuses on supplier performance with the intent to develop our supplier collaboration on an on-going basis.
- The Alumeco Group continuously audits and evaluates the most important suppliers to ensure a continuous positive development of the business relations. This is done by means of 'Supplier Self-Assessment' programs, among others.
- The Alumeco Group aims at having the majority of the Group's purchase covered by suppliers working in accordance with the Alumeco Group Supplier Code of Conduct or own similar Code of Conduct.
- The Alumeco Group complies with the guidelines stated in the Alumeco Group Supplier Code of Conduct.



Actions & results:

The Alumeco Group has divided all suppliers into A- and B-suppliers.

- A-suppliers either supply considerable volumes and/or strategic products. 70% of the Group's purchase is covered by A-suppliers. The rest is covered by B-suppliers.
- 70% of the Alumeco Group's purchase measured on volume is today subject to the Alumeco Group Supplier Code of Conduct.
- 100% of the A-suppliers are today subject to the Alumeco Group Supplier Code of Conduct or to own similar Code of Conduct.

We audit our A-suppliers continuously with the intent to optimise the collaboration and ensure quality and quantity. The audit is carried out by means of a standardised "Supplier Self-Assessment" program (SSA), among others. The program measures on 33 parameters, including:

Management: strategy, organisation, KPI's, investments, security, IT, customer satisfaction, CoC, NDA

Quality: systems, objectives, certification, measurements

Service: knowhow, technology, capacity, flexibility

On basis of the audit result, possible actions to improve the collaboration will be initiated. Actually

- 72% of Alumeco's A-supplier volume is today covered by SSA, which is an increase of 4% compared to 2019/2020.

Future improvements:

The Alumeco Group's intention is to develop the business relationship with our most important suppliers on an on-going basis, e.g. by spreading the Alumeco Group Supplier Code of Conduct and our "Supplier Self-Assessment" program.

Our objective for 2021/2022 is the following:

- 75% of the Alumeco Group's purchase volume is subject to the Alumeco Group Supplier Code of Conduct.
- 100% of the Alumeco Group's A-suppliers are continuously subject to the Alumeco Group Supplier Code of Conduct.
- 10% of the Alumeco Group's B-suppliers are subject to the Alumeco Group Supplier Code of Conduct.
- 80% of the Alumeco Group's A-suppliers are covered by SSA.

KPI's

	Volumen (tons)	Code of Conduct		Supplier Self-Assessment	
		2020/2021	2021/2022	2020/2021	2021/2022
<u>A-suppliers</u>	70%	100%		72%	80%
<u>B-suppliers</u>	30%	5%	10%		
Total	100%	70%	75%		

The KPI's are calculated on basis of tonnages in tons: e.g. ((tons A-supplier)/ (tons total) x 100% = 70%.



| CLIMATE & ENVIRONMENT |

CLIMATE & ENVIRONMENTAL IMPACT

Essential risks

A healthy and clean environment is essential to all of us, and consequently, the Alumeco Group keeps a continuous focus on our impact on the climate and the environment. We prioritise correct handling of scrap and recycling as well as reduction of energy consumption combined with continuous optimisation of forwarding possibilities to prevent unnecessary negative impact on the climate and environment.

Policy

ISO 14001 forms the basis of the Alumeco Group's environment management system, and several Group companies are certified according to this standard. To comply with the standard and to achieve our ambitions as for a minimum negative impact on the environment, we have established ambitious yearly objectives which are evaluated by the Management on a quarterly basis.

We have a constant focus on ensuring recycling of scrap from the production and on reusing other recyclable waste assorted for collection in order to increase the product life cycle. The objective is to reduce the scrap percentage by 0.1% each year.

The Alumeco Group is continuously working on optimising the energy consumption. By measuring our consumption based on number of tons material supplied, we want to reduce the consumption by 3% yearly for the warehouse and production sites in Denmark and Germany.

Actions & results

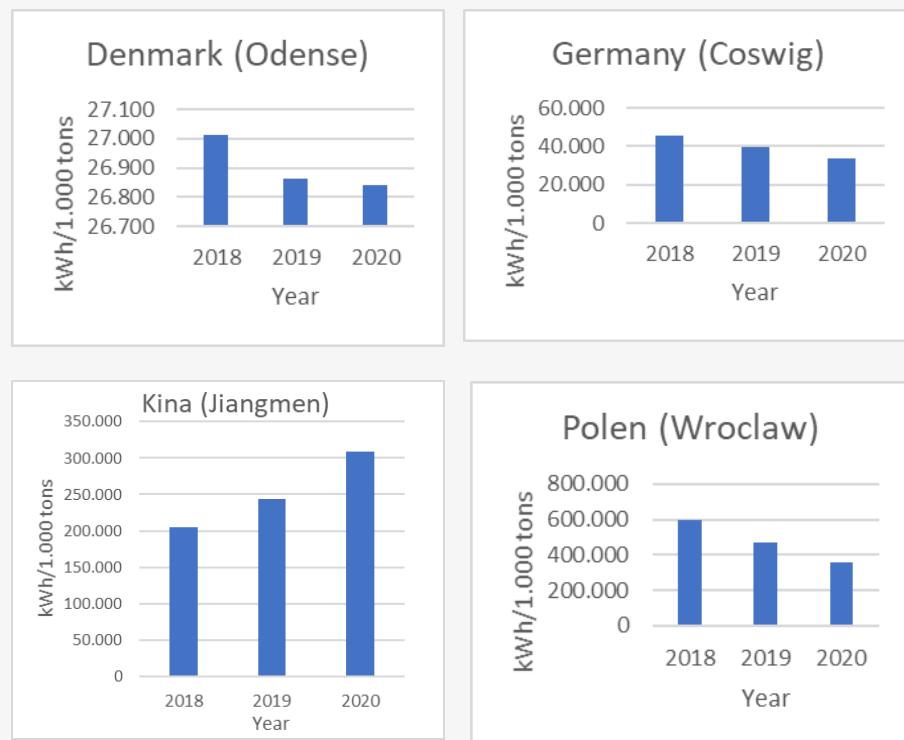
In the past financial year, the Alumeco Group has initiated a number of actions to reduce oil spill, including washing of trucks above an oil separator and well as placing basins under oil canisters in Odense and Coswig.

- We offer aluminium profiles produced at a green energy consumption and high level of recycling in the products GreenAl and RecycAl, where the energy consumption and the level of recycling for GreenAl and RecycAl is a CO2 emission of 2.5 kg CO2/kg aluminium

and 2.3 kg CO2/kg aluminium respectively.

- Recertification according to the ISO standards 9001 and 14001 in all production sites
- The production site in Poland has installed LED lighting in the production halls with a reduction of the energy consumption of 20% and expectedly of 50% in the coming year
- In Poland the unity of scrap sent for recycling has been optimised resulting in a reduction of the CO2 emission for the transport by 50%
- Continuous use of online video platforms rather than travel activity when and where relevant.





The energy consumption is measured on basis of the number of tons supplied from the site.

The increase of the energy consumption in China is due to the significant increase in production activities.

Future improvements

In order to handle scrap, we are working on a solution to convert all aluminium chips to briquettes in Odense and Coswig. The project is expected to be completed during the coming 12 months.

The Alumeco Group has the wish that all our forwarding agents with linehauls are certified according to ISO 14001, and we will examine and work on this issue during the coming year.

To increase utilisation of material as for production orders and to reduce the quantity of scrap, we will launch a project early autumn to be concluded in spring 2022. The project will focus on sawing orders that are handled in Odense and Coswig.

The objective for the company cars in the Group is a conversion to green cars (electric cars/hybrid cars). The conversion will start during autumn 2021 and take place gradually.

As for the next financial year will we start measuring the energy consumption in our location in Gothenburg, Sweden.

In cooperation with the Jobcentre in Odense, Alumeco DK will start a project in autumn 2021 under the program “Lead the Talent” where 4-5 talents will be invited to work on identifying relevant optimisations in our utilisation of warehouse and material.



Environmentally friendly aluminium solutions

Due to the increasing interest in environmentally friendly aluminium solutions from the market and our customers, Alumeco has initiated a brand new project on **Certified Green Aluminium**.

The overall purpose of the project is to establish a range of green, low-carbon footprint certified products within some of our key product areas, mainly for the building and transport industry.

We aim at:

- developing a greener alternative product line compared to market standards along with key Alumeco suppliers.
- creating an overview of available products and possibilities for our partners.
- providing documentation with measurable and comparable data according to standards for greener alternatives to satisfy customers needs.



| EMPLOYEES |

WORKING ENVIRONMENT & SAFETY

The Alumeco Group wishes to offer existing and future employees an attractive and safe workplace.

Essential risks

Especially work in warehouse and production implies a risk of work-related injuries and work-related accidents which may potentially result in absence, liability to pay damages as well as a negative impact on the working environment. The Alumeco Group continuously focuses on ensuring a good working environment and on preventing work-related injuries and accidents as far as possible.



Policy

In addition to following the existing laws and guidelines in force, the Alumeco Group has specified focus points, all with the purpose to support a good and safe working environment and to minimise work-related injuries and accidents:

- to work according to the guidelines in ISO 45001.
- to have an efficient working environment organisation, including to have HSE-responsible employees in relevant companies.
- to minimise work-related accidents through cause analysis and implementation of relevant preventive actions to avoid similar accidents.
- to meet internal guidelines, including to ensure easily available instructions on the use of protective equipment.
- to have a safety policy for external visitors.
- to offer health examinations and relevant safety courses, including first aid courses.
- to undertake regular workplace assessments.
- to record all internal safety trainings.



Actions & results

During the past financial year, we have worked with the following areas:

Work-life balance & health

To promote a good work-life balance and to minimise the risk of stress, we have introduced the possibility of having flexible working hours, offered yearly flu vaccination, offered scanning of the spine as well as offered assessment of the workplace by an occupational therapist.

Work accidents

To minimise the risk of work related accidents in connection with tower and overhead travelling cranes, we have implemented an internal safety training for all existing and temporary workers as well as for all newly employed workers during their introduction. The training is repeated annually.

The working environment organisation has structured the work with work related accidents and has selected focus areas which are reviewed in a cooperation between management and employees.

The graph showing work related accidents bases on the number of all work accidents in the period that have been reported to the working environment groups in the individual companies compared to the average number of employees in the same period. As for Odense work accidents experienced by temporary workers have been included in the number of work accidents, however the temporary workers have not been included in the average number of employees.

Workplace Assessment

The result of the latest workplace assessment in Odense is handled by working groups established for that purpose and consisting of both Blue and White Collars. The working groups have prepared individual action plans, and the implementation is expected to be concluded in 2021.

When Aluwind in Poland took a new warehouse building into use, an optimisation of the lay-out resulted in a significant improvement of safety minimising risks of accidents with trucks and forklifts.

Our Chinese production site has implemented big tanks for welding gas instead of many small tanks as previously in order to reduce the internal transport and to improve the production safety.

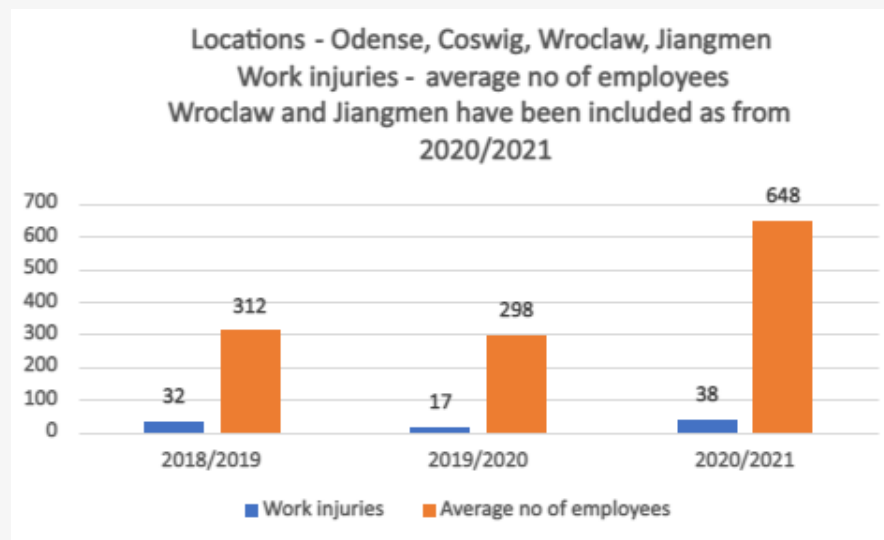
In China the noise nuisance has been in focus and has been reduced in the office areas.

Future improvements

The objective for the coming financial year is to obtain certification according to ISO 45001 in the production sites in Odense and Coswig. The project will start with a review of all working operations and flows, and where relevant to adapt them according to ISO 45001. The production sites in Poland and China have been certified in this connection.

In Odense the internal safety training will be implemented in all warehouse and production areas to ensure that all employees go through relevant training. Furthermore the process with the on-job-training and competence management will be developed further in a close cooperation with the employees.

The analysis of work accidents and near-miss accidents is improved to optimise prevention of work accidents further.



EMPLOYEE INTEGRATION

Essential risks

The Alumeco Group's employees are an important resource and are crucial for our market position. Without the necessary integration, the Alumeco Group risks not being able to attract, retain and develop competent employees.

Policy

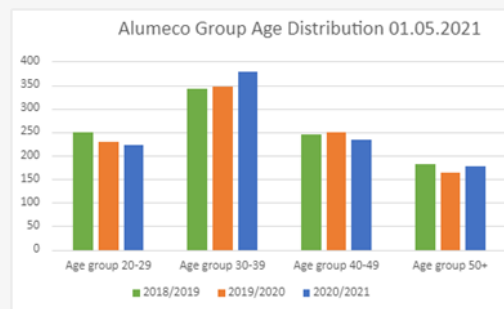
Our collaboration founds on mutual confidence, understanding and respect. The working conditions are organised to increase the level of safety, satisfaction and efficiency in the daily work.

The Alumeco Group respects and complies with human rights and does not tolerate any kind of breach of human rights.

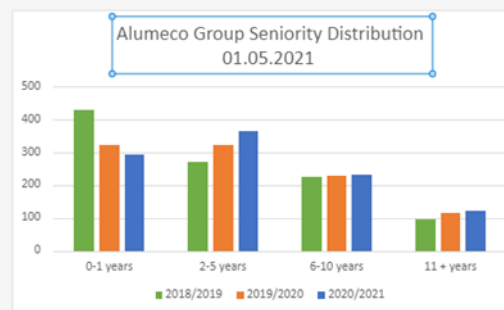
The Alumeco Group promotes a fair and equal integration of employees and does not accept any kind of harassment or discrimination regardless of sex, race, skin colour, religion, political or sexual orientation, social or ethnic background, age or disability.

The Alumeco Group has drawn up a Group Employee Code of Conduct that is both part of the Corporate HR Policy and has to be read and accepted by all White Collars in the Group once a year. 97% have read and accepted to guidelines in the Code of Conduct.

Employee Demographics - Alumeco Group



♦ The age distribution is stable and indicates that the Alumeco Group's initiatives concerning working environment and personal development meet the employees regardless of age.



♦ The development of the seniority distribution shows an increasing degree of retainment of competences and experience - indicating that the Alumeco Group succeeds in integrating new employees and in offering relevant and adequate personal development.

The distribution on age and seniority has been established by dividing the average number of permanently employed Blue and White Collars in the Group into the selected age and seniority groups. The data have been extracted from our ERP-system where all employees are established. Temporary workers are not included.



Actions & results

The onboarding program for new employees are continuously updated to ensure a relevant and sufficient introduction to the Alumeco Group, to the function of the new employees as well as to ensure the relation to colleagues.

When relevant, a mentor is appointed among the experienced employees to support a good integration of new employees. The purpose of the mentor system is to ensure a good integration both as for social and for professional issues.

The onboarding program is evaluated regularly by the new employees, and based on the past 12 months, the evaluations received show a satisfaction rate of 81%. The lower percentage compared to the previous year is a result of many postponements of onboarding activities as many employees have been working from home.

The Covid-19 pandemic has challenged the Alumeco Group resulting in new habits and work methods. From the very first months, we have monitored the infection cases and the overall well-being in the company. From the beginning, we have increased the focus on hygiene and safety, especially in the areas where more employees share the work station.

Besides the increase in working from home has been supported by guidelines to ensure a healthy and safe working environment in the home. According to our evaluations, the pandemic did not impact the well-being nor the non-financial conditions negatively.

At the time of writing, the pandemic is **abating** and the work situation is returning to the well known conditions from before the pandemic, we have prepared common guidelines, as the work from home and the increased digitalisation will have an impact on our work methods, and we will have to ensure a continued optimal operation and well-being. The guidelines will be adapted to the local national standards.



In case of the need to increase the staff in the warehouse and production in Denmark, we have established a program for a group of aspirants which consists of a presentation of the company and the products supplemented by a stay of 3 months in the different areas. Apart from ensuring a thorough introduction to the company, we also have the side benefit that the potentially new employees become more flexible gaining a broad understanding of the company and will thus be easy to move internally

Future Improvements

The onboarding program undergoes a continuous development and adjustment on basis of the evaluations received and according to the needs of the Alumeco Group. The intention is to expand the use of the mentor system.



EDUCATION & PERSONAL DEVELOPMENT

Essential risks

Employees possessing the required knowledge and relevant competences are a decisive factor for the Alumeco Group in order to maintain our competitiveness and market shares.

Policy

The Alumeco Groups offers and encourages employees to develop and update their knowledge and competences continuously. At the yearly feedback dialogues, the individual employee's performance, ambitions and need for development of competences are discussed and evaluated.

The Alumeco Group offers both internal and external education such as single courses and long-term education.

Being a global Group, we have the possibility to offer stationing and redeployment on basis of individual evaluation.

Actions & results

The Alumeco Group has established a platform for internal digital knowledge sharing for employees on all levels.

Employees, both Blue and White Collars in the Danish based companies, have followed external courses—from single day courses to multi annual educations paid by the Alumeco Group. Furthermore many employees have followed webinars of short or long duration.

In connection with the merger of the companies Alumeco A/S and Metalcenter Group A/S, many sales people had to acquire knowledge and insight in a new product area. Consequently, we held many training sessions during the months of January and February 2021.

As a new initiative, we have employed a Project Manager in Odense to develop, implement and contribute to the development of competences of the employees in warehouse and production, including to prepare education material and to coordinate the training.

Unfortunately, the long period with restrictions due the Covid-19 pandemic has paused some external training activities. However, some activities have naturally been carried through as many webinars have been held.

Future improvements

The Alumeco Group continuously updates the annual feedback dialogue and is continuously reviewing the competences of the employees.

In the coming period, the focus will be on establishing an overview of the competences in selected departments using a simplified competence matrix that will contribute to a high degree of transparency in the departments.



SOCIAL RESPONSIBILITY

Essential risks

Being a socially responsible Group, we see a risk of both personal and financial character when a person due to reduced ability to work, unemployment or lack of work experience faces challenges in entering or re-entering the labour market.

Apart from implying a risk for the challenged person, we also see a risk for the surrounding society and consequently also for the Alumeco Group to lose or waste knowhow and loyal employees.

Policy

Employees who have reduced ability to work due to illness, injuries or age are offered, to the widest extent possible, temporary or permanent measures to retain the employees in question.

As far as possible, the Alumeco Group offers internships to citizens who have been outside the labour market.

The Alumeco Group cooperates with educational institutions and offers both trainee periods and apprenticeships.

Actions & results

We hold a continuous contact with local job centres and education institutions, however the Covid-19 pandemic and the consequent restrictions have unfortunately limited the possibility to offer internships.



We have cared for our own employees who have been absent because of illness for a long period in order to help them back to work in the best possible way by means of dialogue, reduced work hours and general adjustment of tasks.

At the same time, we wish to help students and newly educated persons to enter the labour market, and therefore we offer student jobs, trainee periods etc. to the possible extent and according to the resources of the organisation.

Future improvements

The Alumeco Group will continue and develop the cooperation with job centres and educational institutions, also to take on social responsibility.

Our ambition is to implement more indicators of social responsibility in operations to initiate more relevant actions according to the needs of the individual Group companies.

We



| ANTI-CORRUPTION |

The Alumeco Group complies with legislation and refrains from all forms of use of corruption, bribery and other forms of misuse of power. It is important for us to be a reliable company with high integrity and to live up to expectations from our stakeholders, the society and our business partners.

Essential risks

As an international Group, our interaction with our business partners implies a risk of corrupt arrangements and bribery.

Policy

To prevent any form of corruption and bribery, all employees interacting with our business partners are



obliged to act according to our anti-corruption policy. The policy lays down clear guidelines as for what is acceptable, and what is unacceptable behaviour.

Alumeco Group Anti-Corruption Policy -

Focus points:

- ✓ Any demand or offer of bribery must be rejected.
- ✓ Nepotism and conflicts of interest must be prevented.
- ✓ Violation of the policy and rules in force will be sanctioned.
- ✓ All incidents and attempts of corruption must be reported.

Actions & results

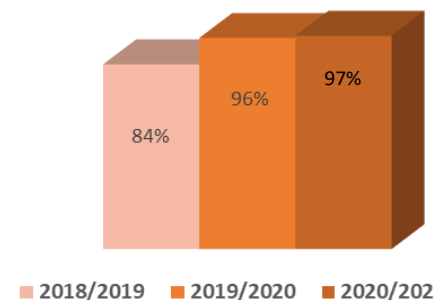
The anti-corruption policy is continuously updated to the current risk assessment.

Once a year all employees whose function implies interaction with business partners are asked to confirm that they have read and accepted the anti-corruption policy.

In 2020/2021 zero incidents of corruption was reported in the Alumeco Group - just as in 2019/2020.

In 2020/2021, 97% of the employees, who have interaction with business partners, have confirmed to have read and accepted the Alumeco Group's Anti-Corruption Policy.

Percentage Accept of Anti-Corruption Policy



Future improvements

To support the general policy, the Alumeco Group's subsidiaries will prepare company specific and/or country specific guidelines as a supplement to emphasise the line between acceptable and unacceptable behaviour.

The Alumeco Group will start preparation of a whistleblower policy and procedures as well as setting up a report portal in order to comply with the legislation.



| DATA SECURITY |

Essential risks

Concurrently with the increased use of digital media, both in private and business context, an increase of digital crime, such as phishing attacks and other forms of 'social engineering' occurs.

The purpose of these attacks is to get access to different types of confidential data or to block access to data. The attacks are typically aimed at a single user or a group of users. We also see that a breach of security in a company is often caused by negligence by one or more users.

Policy

All companies within the Alumeco Group are dependent on well-functioning IT-systems and infrastructure ensuring available data, just as integrity and confidentiality are essential for the service of our customers.

Consequently, our first priority is always to have secure and stable IT-systems that withstand possible security breaches as well as to ensure high awareness of data security and an appropriate digital behaviour from our employees.

Actions & results

To prevent security breaches, we cooperate with external IT security experts to outline on an on-going basis the current threat assessment and to establish prioritised actions to minimise risks.

The actions focus on:

- securing the IT-systems against cyber attacks.
- increasing the awareness of cyber security and information security with our users.



The work with security includes, among other things, a constant supervision and up-date of our systems as well as implementation of prioritised security measures with the purpose to reduce the vulnerability towards cyber attacks.

The Group's employees follow a mandatory and focused cyber awareness training as part of our security and awareness campaign. A focus that will continue and be developed continuously.

Future improvements

As we expect the risk of cyber attacks to increase in future, it is essential continuously to work with the security of our systems and with our employees' cyber awareness.

The awareness training applies especially to new employees, but is definitely also essential in terms of upholding the security awareness with existing employees.



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