

Policy - Corporate Social Responsibility (CSR)

Our Core Values: As a globally leading supplier of aluminium strip to the automotive heat-exchanger industry, we seek to be a good corporate citizen in all aspects of our operations and activities.

CSR is a long-term commitment for us to operate in an economically, environmentally and socially responsible manner and it will become an integral part of who we are and what we do.

Objective of this CSR policy: Our CSR policy is based on our core values to fulfil stakeholder demands, minimise our environmental impacts and contribute to the sustainable development of society.

Customers

We seek to establish a long-term and mutually beneficial relationship with all customers. We aim to develop aluminium solutions suitable for customer's requirements in terms of satisfaction, reliability and trust. We:

- ◆ always listen to our customers' desires and we are committed to meeting and exceeding their expectations
- ◆ provide more environmentally friendly products and services to our customers by using our superior technology and innovation to reduce harmful effects on the environment
- ◆ provide clear information to our customers on the direct and indirect social and environmental implications of our products and service
- ◆ ensure that all customers have easy access to our services.

Employees

We recognise that our employees are the company's most vital resource and essential in making the company successful. We aim to fulfil and satisfy the working lives for all present and potential future employees to create a better workplace. We:

- ◆ provide employees with a safe and comfortable working environment
- ◆ ensure a reasonable work-life balance by providing flexible working hours and working locations
- ◆ give employees the freedom to express their ideas and opinions openly and honestly, and respect the diversity of all employees
- ◆ nurture employees to help them gain satisfaction from their self-development
- ◆ ensure the relationship between Sapa Heat Transfer AB and staff is that of shared responsibility and shared success through our profit sharing system and employment deal.

Suppliers

We aim to build stable and trusting mutually beneficial relationship with our existing and potential suppliers. We:

- ◆ ensure all dealings are handled in honest and fair ways
- ◆ improve communication efficiency with our suppliers
- ◆ give priority to suppliers who comply with internationally recognised standards: ISO 9001:2009, ISO/TS 16949 and ISO 14001:2004.
- ◆ evaluate environmental and social impact of our suppliers and encourage them adopt responsible practices.

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Environment

We want to minimise our impact on the environment and our environmental risks. Sapa Heat Transfer AB is committed to continuous environmental improvement including the prevention of pollution and improving efficiency in the use of resources including energy, water, packaging and other raw materials. We will:

- ◆ recognise our direct and indirect environmental impacts, inform the external and the internal our environment work and develop programs to manage them
- ◆ integrate Environment, Health and Safety (EHS) into all operations
- ◆ exceed basic compliance with all environmental legislation and regulation, and strive to continually improve our performance using systems, such as ISO 9001, ISO 14001, SS627750 and ISO/TS 16949.

Society

We recognise our duty to be involved in our local communities, and we aim to support the creation of prosperous, educated and healthy communities. To contribute to the sustainable development of local communities, we:

- ◆ cooperate with local communities for long-term mutual development
- ◆ provide resources to support the charities and organisations within our communities that make them a better place to live, work and play to help create a sustainable society
- ◆ develop strategic development programmes for local communities, which consists of three main pillars (knowledge, culture and sport): create a shared universe of its knowledge, participant the further development of the dynamic culture and support sport activities that give children and young people in particular the best possible conditions for pursuing an active and healthy lifestyle.

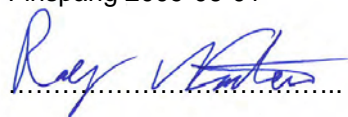
Roles and responsibilities

- ◆ Each Sapa Heat Transfer AB stakeholder is responsible for abiding by the fundamental principles of our Corporate Social Responsibility policy
- ◆ All stakeholders are responsible for considering and evaluating the social and environmental impacts of their business operations to ensure that our business practices are consistent with our CSR principles. CSR guidelines shall be developed in accordance with the specific challenges and characteristics of each operation. Every stakeholder is responsible for developing and maintaining adequate organisational capabilities to ensure compliance with these corporate principles
- ◆ Our Environment Manager monitors and reports the implementation of the CSR policy for Sapa Heat Transfer AB
- ◆ Line managers are responsible for CSR implementation and for communicating the basic principles in this document to all employees in their organisation.

Key steps to integrate CSR within all aspects of operations

- ◆ Raise awareness of our social and environmental responsibility among staff members, leadership, suppliers and the wider community to ensure implementation of CSR policy by introductory and training programmes.
- ◆ Ensure the commitment of top management, and particularly the line managers, ensuring that the policy is communicated throughout the organisation
- ◆ Systematically co-ordinate CSR policy with all our operations
- ◆ Incorporate the results of a CSR Audit within the company's annual report.

Finspång 2009-06-01



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