

HAI FAIRNESS CODE OF CONDUCT FOR SUPPLIERS (V04 01/21)

This Code of Conduct for Suppliers describes our beliefs and values. HAI Group has committed itself to internationally accepted and advocated principles for ethical and legally compliant business practices and to support responsible and sustainable production and procurement. Therefore we have implemented a systematic approach to the application of this Code of Conduct for our supply chain business partners, including suppliers, contractors, consultants and agents.

Our goal is to ensure that our business relationships are based upon a foundation of integrity and sustainability and reflect the values and principles that HAI group promotes internally and externally. We are committed to developing an organizational culture which implements a policy of support for internationally recognized human rights and seek to avoid complicity in human rights abuses. HAI group in particular supports the principles laid out in the International Bill of Human Rights, the UN Convention on the elimination of all forms of discrimination against women (CEDAW) and the ILO Core Conventions on Labour Standards.

We expect all our Business Partners to comply with the principles set out in this Code of Conduct for Suppliers and will actively support and promote such principles with their own business practices and supply chain business partners.

BUSINESS INTEGRITY AND MANAGEMENT

Business partners shall comply with all applicable laws and regulation and will not encourage or engage in any activity, practice or conduct that would be an offence under or breach of any applicable law relating to corruption and bribery.

Business partners will not pay or accept bribes

or other benefits in order to obtain or retain business or other advantage in the conduct of business. They will not request, accept or receive anything of value or an undue advantage that may influence their decisions, nor take part in or seek to influence any decision where there are related circumstances, factors or relationships that could give rise to an actual or perceived conflict of interest.

Business partners will not enter into or otherwise engage in any form of agreement, arrangement or activity that would be a breach of applicable competition laws and regulations, including but not limited to illegal price-fixing agreements.

Business partners will comply with all statutory and official regulations and ensure that their products and services meet the latest applicable legal, regulatory and other requirements regarding of the exporting country, importing country and the destination country named by the customer. To ensure implementation of these rules throughout the supply chain, HAI is entitled to demand written documentation of compliance at any time.

HUMAN RIGHTS / WORKING CONDITIONS

We strive to safeguard the long-term future of the HAI Group's sites and, thus, the jobs of our employees. We believe that trusting our employees, colleagues and managers, cooperating with them and treating them with respect, supporting their progress and development, and focusing on continuous improvement as well as occupational health and safety are important for ensuring long-term staff satisfaction and safe working environments.

Our business partners shall ensure that the applicable standards of the International Labour

Organization are observed. The human rights of all employees need to be respected. including non-discrimination, freedom of association, the right to engage in collective bargaining and the prohibition of child labour or forced labour. Business partners will not employ people against their will or require employees to lodge identity papers or deposits as a condition of their employment.

Business partners will comply with all applicable laws, regulations and agreements regarding working hours, regular vacations and appropriate and timely remuneration. They will ensure a healthy and safe working environment for all employees.

Business partners will respect local religious and cultural customs and the rights and integrity of local communities and indigenous people.

ENVIRONMENT

We take our responsibilities towards the environment very seriously. In accordance with its vision, the HAI Group implements and develops comprehensive environmental standards throughout the entire production process with the help of a seamless value chain.

Our business partners will seek to avoid pollution and to minimize emissions and waste. Environmentally friendly technologies and processes shall be developed and implemented.

COMPLIANCE AND EVALUATION

We expect our business partners to support us in promoting the principles stated in the HAI group`s Code of Conduct for Suppliers by proactively incorporating these rules of conduct into their own business processes. Each Supplier accepts to be assessed or audited by HAI or by a third party mandated by HAI on the above-mentioned principles. In case any

violation of this Code is identified, the supplier might, at HAI's discretion, be given time to remediate the problem. If a solution cannot be found, we reserve the right to terminate the business relationship.

The current version of the HAI Code of Conduct for Suppliers can be viewed and downloaded at any time from <https://www.hai-aluminium.com/en/downloads/>.

Violations of the HAI Code of Conduct for Suppliers can be reported to:

ethics@hai-aluminium.com

Confidentiality is guaranteed.

SIGNATURE

I hereby acknowledge that I am an authorized representative of the company referenced below, have carefully reviewed and understood the substance of the above document.

Supplier company name

Supplier representative name and title

Date, signature and company stamp
