

HAI Fairness

ANTI-CORRUPTION POLICY

The HAI Group considers it paramount to conduct its business with honesty, integrity and reliability. We actively encourage transparency and an ongoing dialogue with our stakeholders. They include our customers and employees, government agencies, local authorities and communities, as well as the media.

WHO DOES THIS POLICY APPLY TO?

Our executives advise and support our employees in complying with this policy and the principles it sets out. This policy applies to all HAI Group employees. Violations may result in disciplinary action.

AVOIDING CONFLICTS OF INTEREST

Bribery is the giving or receiving of payments or benefits offered directly or indirectly to individuals, such as business partners, customers or potential customers, with the aim of influencing their actions or decisions in their official or business capacity. In business, conflicts of interest can arise that are not always immediately obvious. Gifts or hospitality should be declined if they are offered in exchange for any action, or if they involve cash, stock, securities or other items of more than a nominal value.

- Seek advice at an early stage if you are unsure whether there is a conflict of interest or whether one might arise
- Decline generous invitations or gifts if in doubt

PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING

The HAI Group conducts all business in a manner that prevents the misuse of legitimate transactions to conceal the

criminal origin of funds, or to finance terrorist or criminal activity.

- Report your concerns if you notice any suspicious transactions or activities

TRANSPARENCY AND RECORD KEEPING

Accurate accounting and thorough record keeping help us to meet legal requirements and reflect the business integrity of our company. Payments to third parties, business partners, customers, etc. must never be made without an invoice. Receipts must be retained to ensure full traceability. Restaurant bills must be settled in accordance with the HAI Hospitality and Business Travel Policy.

- Always bill transactions correctly (correct allocation, correct period, correct account, correct department, etc.)
- When making payments on behalf of the company, carefully retain receipts and documentation to prove the transaction is legitimate

QUESTIONS, AND REPORTING VIOLATIONS

This policy relies on our employees raising issues and concerns quickly, without fear of the consequences. You can send questions about the requirements of this policy or report violations at any time by speaking to your supervisor or by sending an email to ethics@hai-aluminium.com.

THE MANAGING DIRECTORS

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