

HAI Fairness

CODE OF CONDUCT FOR SUPPLIERS (v8 1/23)

This Code of Conduct for Suppliers specifies our beliefs and values. The HAI Group is committed to the internationally recognized principles of ethical and legally compliant business practices, and to supporting responsible and sustainable production and procurement. To achieve this, we systematically use this Code of Conduct with our business partners in the supply chain, our suppliers, contractors, consultants and agents.

Our intention is to ensure that our business relationships are based on integrity and sustainability. We want these relationships to reflect the values and principles we foster within the HAI Group and beyond. We have created an organizational culture that actively supports internationally recognized human rights and strives to avoid any involvement in human rights abuses. The HAI Group particularly supports the principles of the International Bill of Human Rights, the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and the ILO's Core Labour Standards.

We expect all of our business partners to comply with the principles in this Code of Conduct, and to actively support and promote these principles in their own business practices and in their supply chains.

INTEGRITY AND MANAGEMENT

Business partners must comply with all applicable laws and regulations and refrain from promoting or engaging in any activities, practices or conduct that constitutes a criminal offence or violates any applicable anti-corruption or anti-bribery laws.

Business partners agree not to give or to accept bribes or any other benefits in order to gain or retain any advantage in business or otherwise in the course of their business. They must not request, accept, or receive anything of value or any improper advantage that might influence their decisions. They must refrain from decision-making or attempting to influence any decisions where the circumstances, factors or relationships may lead to any real or perceived conflict of interest. Business-related benefits (e.g., business meals) must comply with locally accepted good business practice and be reasonable in terms of value and frequency.

Business partners must not enter into any agreements, arrangements or activities that violate applicable competition laws and regulations. This includes, but is not limited, to illegal price fixing.

Business partners must meet all legal and regulatory requirements. They must ensure that their products and services comply with the respective applicable legal, regulatory and other requirements of the exporting country, the importing country and the destination country specified by the client. To verify that these rules are applied throughout the supply chain, HAI is entitled to request proof of compliance at any time.

Suppliers must strongly oppose any form of money laundering and take measures to prevent their financial transactions from being used for money laundering or terrorist financing.

Suppliers must respect intellectual property rights and the confidentiality of trade secrets and customer information. Compliance with data protection laws, specifically the EU Data Protection Regulation, or GDPR, is mandatory.

HUMAN RIGHTS AND WORKING CONDITIONS

We are committed to securing the long-term future of the HAI Group sites and, in turn, the jobs of our employees. We believe that long-term employee satisfaction and a safe working environment come from trusting our employees, colleagues and managers and working cooperatively with them. We treat them with respect, support their professional and personal development. We also focus on continuous improvement and occupational health and safety.

Our business partners must commit to meeting applicable International Labour Organization standards. The human rights of all employees must be respected. This specifically applies to requirements and measures in the following areas:

Non-discrimination:

This involves taking active measures to prevent harassment in the workplace and all types of discrimination, specifically against gender identity or identification.

Freedom of association including the right to engage in wage and salary negotiation.

Prohibition of child labour or forced labour: Business partners must not employ people against their will or require employees to provide their identity papers or pay a deposit as a condition of their employment.

Occupational safety:

Business partners must comply with all applicable laws, regulations and agreements regarding working hours, regular holiday leave, and appropriate and timely remuneration. They must provide a healthy and safe working environment. All employees must be made aware of any occupational hazards and safe practices and be allowed to refuse or stop unsafe work without fear of the consequences.

Freedom of religion, ethnic identity:

Business partners must respect local religious and cultural customs and the rights and integrity of local communities and indigenous peoples.

Grievances:

Business partners must have established procedures that allow employees to raise concerns about business operations or request information without fear of reprisal.

ENVIRONMENT, ENERGY, SUSTAINABILITY

We have a responsibility to protect the environment and the climate, so energy efficiency and using resource-saving production processes and renewable energy are key. This also means we apply and promote comprehensive environmental and energy standards across the HAI Group value chain and our entire production process. We have developed environmental and energy guidelines for HAI Group sites, which must be strictly followed at all times. Suppliers must obtain, maintain, and comply with all required environmental permits.

Resources and emissions:

Business partners must make every effort to use environmentally friendly technologies and practices in their operations to ensure the sustainable use of natural resources and to limit emissions into the air and water. Suppliers must implement systems to safely manage waste, air emissions, greenhouse gas emissions and wastewater. Water consumption must be kept to the minimum. Suppliers must keep up with developments in plant and products and actively seek out sustainable state-of-the-art solutions.

Chemicals and waste:

Business partners must comply with all applicable laws and regulations on restricting or registering any chemical substances in their end products or used during production. If applicable, such substances must be authorized or notice of their use must be given, in accordance with legal requirements in the relevant market (e.g. REACH). Partners must ensure the safe handling of waste and chemicals at all times.

IMPLEMENTATION AND PROACTIVE IMPLEMENTATION IN THE SUPPLY CHAIN

We expect our business partners to support us in promoting the principles of this HAI Group Supplier Code of Conduct by proactively incorporating these rules into their own business processes. Business partners must disclose information about their business activities, labour relations, health, safety and environmental law practices to all relevant bodies. Suppliers agree to being audited by HAI, or by a third party appointed by HAI, with respect to the above principles. In the event of a violation of this Code, the supplier may, at our discretion, be given a reasonable period to resolve the problem. If no resolution can be found, we reserve the right to terminate the business relationship.

The most recent 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 via the Compliance Line on our website.

We guarantee to process any reports of violations confidentially.

SIGNATURE

I hereby confirm that I am an authorized representative of the company named below, and that I have carefully read and understood the contents of this document.

Supplier company name

Supplier representative name and title

Date, signature