

# SUPPLY CHAIN POLICY

## 1. GENERAL

This policy confirms **Hammerer Aluminium Industries Group's** commitment to respecting human rights, avoiding contributing to the finance of conflict and complying with all relevant UN sanctions, resolutions and laws.

We also commit to using our influence to prevent abuses by others through risk-based supply chain due diligence by implementing the OECD five-step framework for responsible supply chains of minerals from conflict-affected and high-risk areas.

All employees and business partners are encouraged to point out circumstances indicating any involvement in conflict-affected areas or an infringement of legal regulations or internal guidelines. All such circumstances can be reported using the following email address: **ethics@hai-aluminium.com**.

## 2. REGARDING SERIOUS ABUSES ASSOCIATED WITH THE TRANSPORT OR TRADE ACTIVITIES:

We will neither tolerate, nor profit from, contribute to, assist, or facilitate by any party the commission of:

- Torture, cruel, inhuman and degrading treatment
- Forced or compulsory labour
- Any form of child labour
- Gross human rights violations and abuses such as sexual violence
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk

that they are sourcing from, or linked to, any party committing serious abuses as defined in this paragraph.

## 3. REGARDING DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS:

We will not tolerate direct or indirect support to non-state armed groups through transport, trade, handling, or export activities, including, but not limited to, procuring, making payments to, or otherwise assisting or equipping non-state armed groups or their affiliates, as identified by UN Security Council resolutions.

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in this paragraph.

## 4. REGARDING PUBLIC OR PRIVATE SECURITY FORCES:

We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 2, or that act illegally as described in paragraph 3.

## 5. REGARDING BRIBERY AND FRAUDULENT MISREPRESENTATION:

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, or misrepresent the taxes, fees and duties owed to national fiscal authorities for the purposes of trade, handling, transport and export.

## 6. REGARDING MONEY LAUNDERING AND PAYMENT OF TAXES, FEES AND DUTIES OWED TO NATIONAL FISCAL AUTHORITIES:

We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk of money laundering resulting from or connected to the trade, handling, transport, or export, derived from illegal taxation or extortion.

We support the payment and disclosure of all taxes, fees and duties owed to national fiscal authorities related to trade and export from conflict-affected and high-risk areas.

**MANAGING DIRECTORS HAI GROUP**

**Rob van Gils / Markus Schober**

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