

Code of Conduct



HAI Fairness

Code of conduct
for suppliers

Version 02/2025



FOREWORD BY THE MANAGEMENT

Our corporate culture is based on the values of trust, a wealth of opportunities and dynamism. These values are the foundation of our daily actions and determine how we deal with each other and with our business partners.

This Code of Conduct serves as a guideline for our behaviour in our day-to-day work. It helps us to comply with ethical and legal standards and supports us in making decisions in line with our corporate values.

It is particularly important to us that all employees, suppliers and partners familiarise themselves with this Code of Conduct and apply it in their daily work. This is the only way we can jointly create a working environment characterised by trust, fairness and transparency.

We thank you for your commitment and support in implementing these important guidelines.

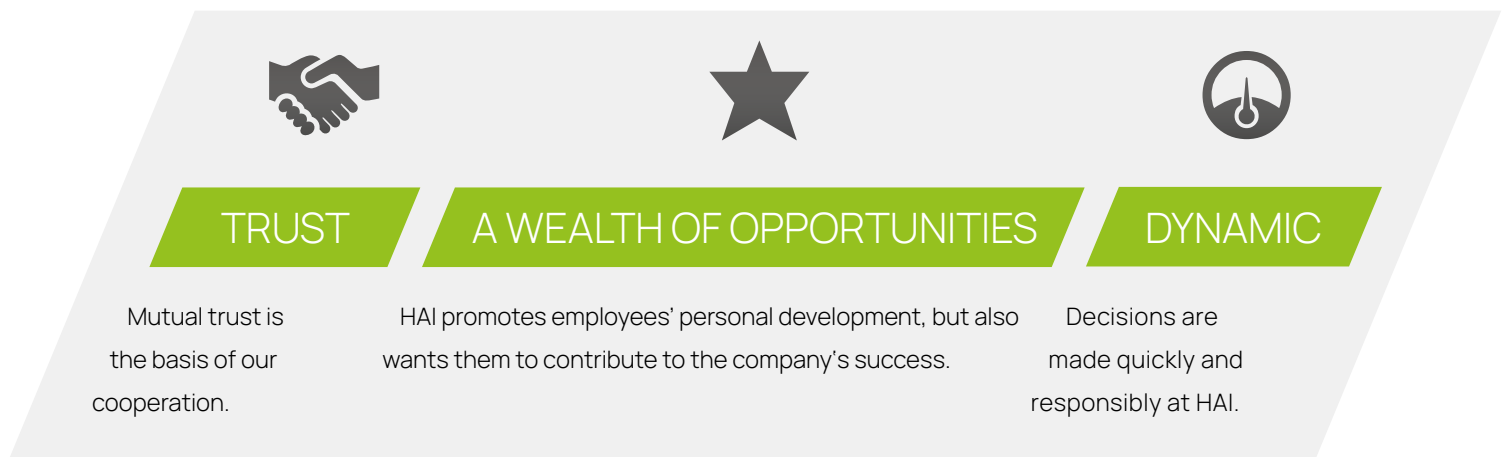
Rob C. J. van Gils
CEO HAI-Gruppe

Markus Schober
COO HAI-Gruppe



1. OUR PRINCIPLES AND VALUES

The principles and values are an important foundation of the HAI Group. All decisions are based on our three corporate values of **trust**, **wealth of opportunities** and **dynamism**.



Our values are in our two codes of conduct, **HAI FAIRNESS for the HAI Group** and **HAI FAIRNESS for suppliers**. Both codes of conduct are available for download in our download centre on the website.

2. 2. THE CODE OF CONDUCT FOR SUPPLIERS IN DETAIL

This Code of Conduct describes our beliefs and values. The HAI Group is committed to internationally recognised principles for ethical and legally compliant business practices, as well as to supporting responsible and sustainable production and procurement. We therefore take a systematic approach to applying this Code of Conduct to business partners in the supply chain, suppliers, contractors, consultants and agents.

Our aim is to ensure that our business relationships are based on integrity and sustainability and reflect the values and principles that the HAI Group promotes internally and externally. We have developed an organi-

sational culture that implements a policy of support for internationally recognised human rights and strives to avoid involvement in human rights abuses. In particular, the HAI Group 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 core labour standards.

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



2.1. EXTERNAL FAIR – INTEGRITY AND MANAGEMENT

Business partners shall comply with all applicable laws and regulations and shall not promote or engage in any activities, practices or behaviour that constitute a criminal offence or a violation of applicable laws relating to corruption and bribery.

Prohibition of corruption, bribery, invitations and the acceptance of gifts:

Business partners undertake not to pay or accept bribes or other benefits in order to obtain or retain a business or other advantage in the performance of their activities. They will not demand, accept or receive anything of value or any unauthorised advantages that could influence their decisions. They will not participate in or attempt to influence decisions involving circumstances, factors or relationships that could lead to an actual or perceived conflict of interest. Business-related benefits (e.g. business meals) must comply with locally recognised good business practices and must be proportionate in both their value and frequency.

Fair and free competition

The business partners will 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.

Compliance with laws and regulations

Business partners will comply with all legal and regulatory requirements and ensure that their products and services comply with the applicable legal, regulatory and other requirements of the country of export, the country of import and the country of destination specified by customers. In order to ensure the implementation of these rules throughout the supply chain, HAI is entitled to demand proof of compliance at any time.

Prohibition of money laundering and terrorist financing

The supplier companies firmly reject any form of money laundering and take measures to prevent their financial transactions from being used for money laundering or terrorist financing.

Protection of intellectual property, confidentiality of business secrets and customer information, data protection

The supplier companies are obliged to respect intellectual property rights as well as the confidentiality of business secrets and customer information. It must be ensured that data protection laws (in particular the EU General Data Protection Regulation (GDPR)) are complied with.

The use of plagiarised or counterfeit materials is prohibited. The HAI Group therefore does not tolerate the use, further processing or marketing of counterfeit products. We also respect intellectual property, in particular intellectual property that is protected by patents, copyrights or trademarks. Unauthorised use or publication will not be tolerated



2.2. EXTERN FAIR – HUMAN RIGHTS AND WORKING CONDITIONS

We endeavour to secure the longterm future of the HAI Group's sites and thus also the jobs of our employees. We believe that trusting our employees, colleagues and managers, working with them and treating them with respect, supporting their progress and development and focusing on continuous improvement and occupational health and safety are important to ensure the long-term satisfaction of all employees and a safe working environment.

Our business partners undertake to ensure that the applicable standards of the International Labour Organisation are complied with. The human rights of all employees must be respected. This includes, in particular, requirements and measures in the following areas:

Prohibition of discrimination

This includes taking active measures to prevent harassment in the workplace and any kind of discrimination, particularly on the basis of gender identity and identification. Discrimination of any kind is not tolerated in the HAI Group and is not compatible with our values.

Freedom of association

Freedom of association includes the right to assemble and form organisations to represent common interests. This includes the right to collective bargaining to ensure fair working conditions and wages.

Prohibition of child labour or forced labour

It is prohibited to employ people, regardless of their age,

against their will or to require them to provide identification documents or deposits as a condition of employment. Forced labour or child labour, as well as modern slavery and human trafficking, are completely contrary to fair working conditions and are therefore prohibited in the companies of the HAI Group, which is why we categorically reject any form of child labour, forced labour or involuntary labour. We also expect this from our business partners; if this is not complied with, we will terminate the business relationship immediately.



Occupational health and safety

The applicable laws, regulations and agreements on working hours, regular holidays and appropriate and timely remuneration must be complied with and a healthy and safe working environment must be provided. All employees must be aware of work hazards and safe practices and can refuse or stop unsafe work without fear of negative consequences.



Religious freedom and ethnic identity

Business partners respect local religious and cultural customs and traditions as well as the rights and integrity of local communities and the indigenous population. Unlawful forced evictions or expropriation of land, forests and water are not acceptable and we call on our business partners to respect these rights and distance themselves from forced evictions.

Rights of minorities and indigenous peoples

We protect the rights of minorities and indigenous peoples, promote the preservation of their cultures, identities and traditions and recognise the importance of development and progress. Our business partners should share our values and commit to recognising the rights of minorities and indigenous peoples and preserving their cultures. We strive for equality and

expect the same from our business partners. We prohibit any form of discrimination.

Grievance mechanism

Procedures are in place to enable employees to raise concerns about business processes or ask for information without fear of retaliation.

Avoiding conflicts of interest externally

Clear guidelines are established to avoid conflicts of interest. This applies in particular to situations in which business partners could be involved in personal or business conflicts of interest. Compliance with these guidelines is of the utmost importance in order to maintain the integrity of our company. We expect our business partners to avoid conflicts of interest. If there are any, we expect clear communication and disclosure.



2.3. EXTERN FAIR – SUSTAINABILITY, ENVIRONMENTAL PROTECTION, ENERGY EFFICIENCY

We are committed to our responsibility for comprehensive environmental and climate protection, high energy efficiency and the use of resource-saving production processes and renewable energies. In line with this vision, comprehensive environmental and energy standards are implemented and further developed throughout the HAI Group's entire value chain in the entire production process. To this end, environmental and energy guidelines have been developed for the HAI Group's sites, which must be observed and complied with in full.

Suppliers must obtain, maintain and comply with all necessary environmental authorisations. In addition to environmental protection, the avoidance of excessive land use and deforestation forms the basis for the preservation of biodiversity. Compliance with all national and international legal standards on biodiversity and animal welfare is a prerequisite.

The HAI Group is committed to social responsibility and respects land, forest and water rights. We call on our business partners to respect these rights as well.

Resources and emissions

Business partners will make serious efforts to integrate environmentally friendly technologies and processes into their activities in order to ensure the sustainable use of natural resources, the preservation of soil quality and the reduction of emissions to air and water. Noise emissions shall be minimised through appropriate measures. Suppliers must have systems in place to safely manage waste, air emissions, greenhouse gas emissions and wastewater discharges. Operational waste must be reduced as far as possible or processed for reuse, and efficient recycling must be endeavoured. Water consumption must be minimised. Suppliers must inform themselves at an early stage about further developments in production facilities and products and seek sustainable, state-of-the-art solutions

Chemicals and waste

Business partners must comply with all applicable laws and regulations regarding the restriction and registration and, where applicable, authorisation or notification of chemical substances contained in the end product or production process in accordance with the legal requirements applicable to the relevant market (e.g. REACH). They ensure that waste and chemicals are handled safely at all times.





2.4. COMPLIANCE IN THE SUPPLY CHAIN, IMPLEMENTATION AND PROACTIVE REALISATION IN THE SUPPLY CHAIN

Our supply chain principles are anchored in our Supply Chain Policy. This policy statement underpins the HAI Group's commitment to respect human rights, avoid contributing to the financing of conflict and comply with all relevant UN resolutions, regulations and laws. In addition, we are committed to using our influence to prevent abuse by others through risk-based due diligence in the supply chain.

We expect our business partners to support us in promoting the principles set out in this Code of Conduct by proactively incorporating these rules of conduct into their own business processes. Business partners are required to disclose information about their business activities, labour relations, health, safety and environmental practices to all relevant parties. They agree to be

audited by HAI or third parties authorised by HAI in accordance with the above principles. In the event of a breach of this Code, a reasonable period of time may be allowed at our discretion to rectify the problem. If no solution can 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 at <https://www.hai-aluminium.com/downloads/>

Violations of the HAI Code of Conduct can be reported via the **Compliance Line** on our website. Confidential treatment of incoming reports of violations is guaranteed.



3. CLOSING WORDS AND CONTACT

The HAI Group lives its corporate values both internally and externally. We expect the same from our business partners.

The foundation of values is the success of the company. To uphold these values at all times, numerous measures have already been taken as mentioned above. This will continue to play a major role in our corporate culture in the future and we are constantly trying to optimise our measures.

Our Code of Conduct is of crucial importance as it sets out the ethical principles and standards of behaviour that apply to all our business partners. This guideline applies to all our business partners and helps us to promote a uniform understanding of integrity and responsibility. By complying with this code, we help to strengthen trust in our company and fulfil our obligations to customers, partners and society.

We endeavour to continuously work on improving our processes and measures in order to meet the high standards we have set ourselves. Every person in the HAI Group is called upon to actively contribute to compliance with and further development of these standards.

Business partners can contact our Compliance department at any time with questions or concerns. This department is available to provide support and ensure that all concerns are handled confidentially and professionally. In addition, whistleblowing reports can be submitted anonymously to ensure the safety and protection of whistleblowers.

For questions and feedback on our Code of Conduct (**HAI FAIRNESS** of the HAI Group and **HAI FAIRNESS for suppliers**), please contact our Compliance Line. You can find contact information and further details on our [Hammerer Aluminium Industries](#) website.

Both codes of conduct can be downloaded from the download centre on our website.

We encourage our business partners to contact us if they have any uncertainties or suggestions. Their feedback is very important to us in order to continuously improve our standards and ensure that we fulfil our ethical obligations.

The management of the HAI Group

Version 10, 02/2025

