

# Anti- corruption policy

**HAI Fairness**

Status 08/2025





# 1. PRINCIPLE

It is a top priority for the HAI Group to conduct all business in accordance with the principles of honesty, integrity, and reliability. Our company-wide Code of Conduct (CoC) provides the overarching framework for responsible behavior. This Anti-Corruption Policy specifies the principles enshrined in the CoC with regard to the prevention of corruption and corruption-related risks. Regulations on business travel and hospitality are set out in a separate HAI Group policy.

In addition to preventing corruption, our compliance approach also covers related risks such as fraud, bribery, embezzlement, and violations of competition law. We promote a corporate culture of openness and transparency as well as ongoing dialogue with our stakeholders, including customers, business partners, employees, authorities, communities, local populations, and the media.

# 2. SCOPE OF THIS POLICY

This policy applies to all employees of the HAI Group. Managers have a special responsibility: they support their teams in complying with the policy, exemplify its principles, and help clarify any ambiguities. Violations of this policy may result in labor, civil, or criminal consequences, including termination or prosecution. The HAI Group has a zero-tolerance policy toward corruption.

# 3. AVOIDING CONFLICTS OF INTEREST

Bribery occurs when benefits are offered directly or indirectly to persons such as business partners, customers, or potential customers in order to influence their actions or decisions in their official or business capacity. In business, conflicts of interest may arise that are not always apparent at first glance.

Entertainment or gifts must be declined if they are given in return for an action and involve cash, shares, securities, or other items that are not of negligible value.

# 4. 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 their use to finance terrorist or criminal activities.

# 5. FRAUD PREVENTION

The HAI Group does not tolerate any fraudulent behavior, such as balance sheet fraud, expense fraud, or manipulation of tenders.



## 6. PROHIBITION OF BRIBERY AND GRANTING OF ADVANTAGES

Any form of bribery – active or passive – is prohibited. This also applies to so-called "kickbacks," inappropriate gifts, or invitations.

## 7. PREVENTION OF EMBEZZLEMENT AND MISAPPROPRIATION

The HAI Group protects its assets through clear responsibilities, the dual control principle, and regular audits. All financial transactions are documented and audited. Any suspicion of embezzlement will be pursued consistently.

## 8. COMPLIANCE WITH COMPETITION LAW

Price fixing, market sharing, or other antitrust violations are strictly prohibited. Clear guidelines and procedures have been established to report and investigate suspected cases.

## 9. TRANSPARENCY AND ACCOUNTING

Accurate accounting and documentation not only help us to comply with legal requirements, but also 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 complete traceability. Restaurant bills must be settled in accordance with the HAI business travel policy.

## 10. RISK ANALYSIS

The HAI Group regularly conducts risk analyses to identify and assess potential corruption risks in business areas, projects, and among business partners. A risk-based due diligence check is carried out before working with new business partners. Further information on business partner due diligence can be found in the Code of Conduct.

## 11. CODE OF CONDUCT FOR BUSINESS PARTNERS

Business partners of the HAI Group undertake to comply with a code of conduct that includes, among other things, a prohibition of corruption, transparency, and ethical behavior. The Code of Conduct is available for download on the website.



## 12. MANDATORY TRAINING

All employees of the HAI Group receive regular mandatory training on corruption prevention, conflicts of interest, ethical conduct, and competition law. New employees complete this training as part of the Onboarding program. Training content is updated as necessary.

## 13. COMPLIANCE WITH THE ANTI-CORRUPTION POLICY

The Compliance Officer is responsible for implementing, monitoring, and developing the anti-corruption program. The management bears overall responsibility. Managers are required to actively support compliance and act as role models.

Compliance with this policy is ensured by the dual control principle. Reported violations are documented and reported in the annual sustainability report.

## 14. MONITORING AND KPIS

The effectiveness of the anti-corruption measures is reviewed regularly. The following key performance indicators (KPIs) are collected and analyzed for this purpose:

- Training rate
- Number of incidents reported via the whistleblower system

The results are included in the annual sustainability report.

## 15. QUALITATIVE AND QUANTITATIVE TARGETS

The HAI Group aims to systematically minimize corruption risks. To this end, we have set the following targets:

- > 75% training rate for all employees by the end of 2025.
- Annual corruption risk analysis in purchasing.
- Publication of an annual sustainability report with key figures on training, reported incidents, and measures taken.

## 16. WHISTLEBLOWING SYSTEM

The HAI Group has established a whistleblowing system. Equal treatment of all complaints is ensured throughout the entire processing procedure. Reports can be submitted anonymously. The confidential treatment of incoming reports of violations is guaranteed. A corresponding process has been developed in the event that misconduct or illegal actions are identified.



The HAI Group recognizes the importance of an effective system for reporting unacceptable violations of our values. To ensure comprehensive compliance with our values, employees and business partners can report suspected or actual violations to the Compliance and Legal Department via the following channels:

- Website (Compliance Line)
- Written report by mail

## 17. RECOMMENDED ACTIONS FOR EMPLOYEES

In order to effectively prevent corruption and the associated risks, we adhere to the following principles:

### 1. Careful handling of transactions

- Ensuring that all transactions are accounted for **correctly, completely, and traceably** – including **correct allocation** to accounts, periods, departments, and projects.
- Retention of all receipts and documents for payments made on behalf of the company in order to be able to prove the legality of the transaction.

### 2. Integrity in dealing with gifts

- **Gifts and hospitality of significant value are generally not permitted.**
- **Generous invitations or gifts** should be declined in case of doubt – especially if a conflict of interest could arise or the appearance of influence could be created.
- The following are particularly **prohibited**:
  - Cash, shares, securities, or comparable monetary benefits
  - Gifts given **in return for an action**
  - Gifts or invitations that are **not merely of minor value**.

### 3. Law-abiding conduct and compliance

- Compliance with applicable **laws** and all **internal compliance requirements** of the HAI Group.

### 4. Responsibility and reporting of irregularities

- **Reporting irregularities or suspicious activities** that could indicate corruption or other violations – even if only suspected.
- Early consultation and coordination with a manager or compliance officer in case of uncertainty as to whether a conflict of interest exists or could arise.



## 18. QUESTIONS ABOUT THE POLICY

Questions regarding the requirements of this policy can be directed to the relevant manager or sent by email to [ethics@hai-aluminium.com](mailto:ethics@hai-aluminium.com) at any time.

This policy is reviewed regularly and amended as necessary to reflect new legal requirements, internal findings, or external developments.

The management of the HAI Group

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