

# Code of Conduct









## 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 treat each other and 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.

**Rob C. J. van Gils**  
CEO HAI-Gruppe

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

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

**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. THE HAI GROUP'S CODE OF CONDUCT IN DETAIL

The Code of Conduct describes our beliefs and values. Our values are standards for our daily work and our behaviour towards our employees, customers, suppliers, business partners, government institutions and all other persons within the scope of our activities. We want to make our decisions in a fair, responsible and respectful manner, and this Code of Conduct serves as a basis and guide.

Mutual trust is the basis for satisfied employees and business partners. The HAI Group also stands for a wealth of opportunities that contribute to personal and entrepreneurial development. Ultimately, all decisions

within the group are made quickly and responsibly. This is what the value of dynamism within our company stands for.

It is the responsibility of every employee to uphold the values and beliefs of this Code of Conduct and to organise their workplaces in accordance with these values. The HAI Group also instructs the companies in its supply chain to act in accordance with these values and to communicate and implement them in their supply chain. In this way, the HAI Group safeguards these values and convictions within the value chain in the long term.



## 2.1. INTERN FAIR

### Human rights

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 health and safety are important to ensure the longterm satisfaction of all employees and a safe working environment.

### Dealing with each other, communicating with each other, trust

Values are very important in the HAI Group. Our employees are treated with dignity, respect and courtesy at every level. This is reflected in the loyalty and sense of belonging of all employees.

In interpersonal communication at eye level, we treat each other with empathy and respect. We listen actively, take each other's needs seriously and create an atmosphere of trust. We pay attention to our choice of words, avoid technical jargon and show awareness and respect. This creates valuable encounters that enrich us.

The cooperation between all employees is based on mu-

tual trust. Our environment requires us to be dynamic and make quick, responsible decisions. This results in numerous opportunities for every employee to develop within the HAI Group. Our other values and convictions, which are described in this Code of Conduct, are derived from these core values of the HAI Group. It is the responsibility of every employee to uphold these values and act in accordance with this Code of Conduct.

### Relationships in the workplace

Close relationships with employees, colleagues and managers can make professional collaboration more difficult if decisions are influenced by personal ties. It is therefore important to us to clearly separate personal and professional interests to avoid dissatisfaction and conflicts in the company or workplace.

Family members who work in the same company can also cause conflicts of interest, especially if they are in a direct reporting line or can influence decisions.

Transparent disclosure of such relationships is necessary to avoid potential conflicts of interest. Through clear communication and openness, we can ensure that our professional decisions are made objectively and in the best interests of the company

### Avoiding conflicts of interest internally

Clear guidelines are established to avoid conflicts of interest. This applies in particular to situations in which employees could find themselves 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.

### Fair working conditions

It is forbidden 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. We endeavour to secure the HAI Group's



locations and thus jobs in the long term. This is achieved by the HAI Group producing various high-quality aluminium products for different industries in a continuous value chain.

The HAI Group supports and respects the protection of human rights as defined by the UN human rights conventions, in particular the UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and the EU Charter of Fundamental Rights. No employee may directly or indirectly violate these human rights principles in his or her actions. The HAI Group supports the general labour rights as defined by the International Labour Organization (ILO).

We are convinced that a trusting, collegial and respectful relationship with our colleagues, employees and managers, the promotion of further development and training as well as a focus on continuous improvement and occupational safety also make a lasting contribution to ensuring satisfaction and making all workplaces safe. Close cooperation with employee representatives and open communication is a key component for us to maintain and promote co-determination. We regard compliance with the legal framework for the protection and safety of employees as a matter of course.

#### Employees

are selected and treated solely on the basis of their skills and performance. Forced or child labour, as well as modern-day slavery and human trafficking, are completely contrary to fair working conditions and are therefore prohibited in HAI Group companies, which is why we categorically reject all forms of child and forced labour, as well as involuntary labour.

## 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. We attach great importance to the health and safety of our employees. To ensure a safe working environment, we implement a variety of measures, including regular training, safety inspections and the provision of suitable protective equipment. Our efforts are certified to the highest standards, including ISO 45001, which stands for an effective management system for safety and health at work. We are committed to continuous improvement and ensuring that all employees can work in a safe and healthy environment.



## Prohibition of discrimination and equal opportunities (diversity, origin, inclusion)

Harassment for any reason (for example, on the basis of age, gender, gender identification or origin) is not compatible with our beliefs and values.

Discrimination of any kind is not tolerated in the HAI Group and is not compatible with our values. This in-





cludes, in particular, discrimination based on gender, ethnicity, religion or ideology, age or sexual orientation. We also do not tolerate any form of sexual harassment. Equal treatment is a top priority for us at all levels. We therefore only enter into business relationships with companies that can also fulfil these standards. The workplace should be a safe place where there is no room for marginalisation based on the above criteria.

## Error culture

A positive error culture means seeing mistakes as an opportunity for learning and further development. We accept mistakes as a natural part of the process but set clear boundaries for misbehaviour.

When communicating with each other, the focus is not on the mistake itself, but on learning from the situation. We encourage people to learn from mistakes and grow together constructively.

## Employee representation

Trust-based communication with employee representatives is crucial for a successful working environment. Open dialogue and transparent information sharing can avoid misunderstandings and strengthen trust. We regularly with employee representatives to work together on solutions and take the interests of employees into account. This not only promotes a positive working atmosphere but also contributes to the longterm stability of the company.

## 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.



## 2.2. EXTERN FAIR

### Independence and integrity

The HAI Group operates with complete autonomy. Our economically responsible, dynamic actions require full compliance with the legal framework. In the interests of fair competition, corruption, antitrust violations, bribes, money laundering, the provision of inappropriate benefits, bribery or unauthorised agreements are not tolerated under any circumstances. Occasional gifts or invitations of low value are an exception, provided that this does not result in a conflict of interest.

The HAI Group will not allow itself to be influ-

enced in any decisions by unauthorised advantages or grant unauthorised advantages to others. By 'unauthorised advantages' we mean anything that is given for the purpose of influencing a business decision by HAI or HAI's business partners.

### Fair and free competition, prohibition of cartels, prohibition of corruption, bribery, invitations and the acceptance of gifts

Fair and free competition is the basis for a functioning market economy. It is therefore of the utmost importance that we strictly adhere to the rules of competition law and avoid all forms of cartels. Cartels, i.e. agreements between companies to dominate the market or fix prices, are illegal and harm free competition.

Corruption and bribery are also strictly prohibited in the HAI Group. Bribery occurs when benefits are offered di-

rectly or indirectly to persons such as business partners, customers or potential customers to influence their actions or decisions in their official or business capacity. This can take the form of money, gifts, invitations or other benefits. Such practices undermine trust in our compa-

ny and are damaging to our reputation.

Conflicts of interest can arise in business life that are not always clearly recognisable at first glance. It is therefore important to be vigilant at all times and to recognise and avoid potential conflicts of interest at an early stage. Hospitality or gifts should be refused if they are given in return for an

action or if they involve cash, shares, securities or other items that are not merely of low value.

To ensure that all employees understand and comply with these principles, we offer regular training and information events. In addition, we have established clear guidelines and procedures for reporting and investigating violations of these principles. Through these measures, we promote a culture of integrity and fair competition in our company.

### Prohibition of money laundering and terrorist financing, export controls

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. We implement strict anti-money laundering policies to ensure that our business







activities are transparent and legal. These measures not only protect our company but also contribute to global security and stability.

Compliance with export controls, economic sanctions and anti-money laundering measures is of the utmost importance to our company. We ensure that all exports comply with the applicable legal provisions and that no prohibited goods or services are supplied to sanctioned countries or persons. Restrictions may also apply to goods that are intended for civilian purposes but can also be used for military applications due to their characteristics (dual-use goods). In addition, we ensure that no products are exported that could be used for the manufacture of weapons of mass destruction.

### **Avoiding conflicts of interest externally**

Avoiding conflicts of interest is crucial for integrity and trust within an organisation. Conflicts of interest can arise in various areas, including relationships outside the workplace, family connections, sponsorship/donations and personal interests

Relationships outside the workplace, such as friendships or business connections, can lead to conflicts of interest and must be made transparent.

Sponsoring/donations and personal interests, such as shareholdings in other companies or voluntary work, must also be disclosed to ensure that they do not conflict with the interests of the company.

By implementing clear guidelines and regular training, we can ensure that all employees understand the importance of avoiding conflicts of interest and act accordingly. Transparency and disclosure are essential to ensure that decisions are made objectively and in the best interests of the company. This helps to create an ethical and trustworthy working environment.

### **Transparency and bookkeeping**

Accurate bookkeeping and documentation not only help us to fulfil 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 kept to ensure full traceability. Restaurant invoices must be settled in accordance with the HAI Service Travel Policy.



## 2.3. CORPORATE RESPONSIBILITY

### INTERNAL/EXTERNAL

#### Sustainable business relationships

As a supplier of high-quality aluminium products, the HAI Group relies on satisfied customers. We achieve this through fairness, the realisation of long-term cooperation, delivery reliability and the highest quality standards, thus creating an environment that will ensure this high level of customer satisfaction in the future. We select our suppliers carefully and carefully. Our focus is on mutual appreciation, support and sustainable, cooperative partnerships.

#### Sustainability, environmental protection, energy efficiency

The HAI Group understands sustainability as a holistic approach that combines ecological, social and economic aspects. Our aim is to ensure resource-conserving, climate-friendly and responsible corporate management. In line with our vision, comprehensive environmental and energy standards are implemented and further developed throughout the HAI Group's value chain

We concentrate on the following core areas:

- **Conserving resources and the circular economy:** Sustainability begins with the efficient use of resources. A high proportion of recycled aluminium in our products reduces the need for primary aluminium and conserves natural raw materials. Strict adherence to the waste hierarchy and the promotion of closed material cycles also minimises waste and creates opportunities for reuse. The HAI Group has efficient recycling processes in place.
- **Climate protection and CO<sub>2</sub> reduction:** We are committed to actively reducing emissions along our entire value chain. With our SustainAl alloys, we sell aluminium products with a CO<sub>2</sub> footprint that is significantly below the European average.



- **Biodiversity and protection of natural habitats:** The HAI Group is actively committed to preserving biodiversity. We carry out regular site assessments to minimise environmental impact and protect flora and fauna.
- **Energy efficiency and renewable energies:** Our production processes and sites are continuously scrutinised for energy-saving potential. Measures include the reduction of energy consumption using state-of-the-art technologies and the use of 100% green electricity.
- **Collaboration:** Sustainability is a collaborative process. We therefore actively involve employees, business partners and customers. Through training and awareness-raising, we promote more environmentally conscious behaviour in all areas. We also work with our partners along the supply chain to promote sustainable innovation and adhere to the highest environmental standards.
- **Conflict materials:** We are committed to not using conflict materials in our products. Conflict materials, also known as 3TG, include tin (Tin), tantalum (Tantalum), tungsten (Tungsten) and gold (Gold). These raw materials are often mined in conflict-affected or high-risk areas (CAHRAs) - as defined in Regulation (EU) 2017/821 and/or can contribute to the financing of armed conflicts and serious human rights violations. We expect all our business partners to deal responsibly with this issue and to ensure that their supply chains are free of conflict materials. Our suppliers must be able to demonstrate that they have taken appropriate measures to verify the origin of their raw materials and avoid conflict materials.

Our business partners must obtain, maintain and comply with all necessary environmental permits.

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.

## Sustainable chemical management and emission control

The HAI Group is committed to proactively minimising environmental impacts and ensuring the responsible use of chemicals. Our measures include strict monitoring and safety standards to prevent emissions and the release of harmful substances into the environment. This applies in particular to chemicals that we store, handle and dispose of in accordance with applicable legal regulations. We rely on the continuous training of our employees in the safe handling of substances, the use of modern, environmentally friendly technologies and the consistent implementation of emergency plans and drills in order to be prepared for potential incidents.

In addition, bans on hazardous chemicals and legal waste regulations are strictly adhered to ensure that working materials and waste are handled in an environmentally friendly manner.





## 2.4. PROTECTION OF THE COMPANY

### Protection of company property

We treat all our work equipment (e.g. IT equipment, work materials, furnishings) that constitute company property responsibly. All employees are required to protect company property from misuse and not to use it for private purposes. In addition, consumables are used in a resource-conserving manner.

### Protection of business and trade secrets

We expect and assume that all employees, customers, suppliers, business partners and government institutions will treat as confidential all business and trade secrets that become known to them during an ongoing business relationship. This includes trade secrets, projects, customers, suppliers, contracts, technical information and internal company matters. The security of this information must also be guaranteed beyond the duration of the relationship.

### Data protection

It must be ensured that the data protection laws (in particular the EU General Data Protection Regulation (GDPR)) are complied with in order to maintain the protection of the personal data of our employees, customers, suppliers, business partners or other state institutions. It is assumed that any processing and dissemination of personal data is carried out on the basis of legal provisions.

The obligation to maintain confidentiality and safeguard information applies to everyone and remains in force even after the business relationship has ended.

### Protection of intellectual property

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. This will not be used or published without authorisation.

### IT security

In today's digital world, IT security is of crucial importance for HAI. It is particularly important to protect sensitive data when employees use mobile working. Secure passwords must be used to prevent unauthorised access. It is also essential that only licensed software is used to avoid security vulnerabilities and ensure the integrity of the IT infrastructure.

Clear guidelines and regular training ensure that all HAI employees are familiar with the company's IT security regulations and comply with them.

### Political activities/lobbying/representation of interests

It is very important for HAI to represent our interests and positions in political decision-making processes. In doing so, we always act in accordance with the principles of transparency, traceability and accountability.

Our lobbying activities are coordinated centrally and carried out in strict compliance with all legal requirements. Unfair influence on politics and legislation is strictly prohibited.

By representing our interests responsibly, we ensure that our company's concerns are heard and taken into account in political discussions. This also includes working with industry associations and other organisations to pursue common goals and improve the framework conditions for our business activities.





## 2.5. COMPLIANCE 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.

The HAI Group has taken steps to ensure that our Code of Conduct is an integral part of all new contracts to protect human rights. All business partners are required to recognise our Code of Conduct. If we receive internal or external information that a possible human rights violation has occurred or that our Code of Conduct is being disregarded by business partners, we initiate investigations. If the investigations confirm the suspected cases, we draw the consequences and suspend the orders for the time being.

Various indices are checked at regular intervals to ensure that the assessment of our suppliers and their coun-

tries of origin is up to date with regard to human rights, corruption and high-risk areas.

For example, we regularly review the Global Rights Index (GRI), which provides a comprehensive overview of compliance with labour rights worldwide. This enables us to assess the countries of origin of our suppliers as well as the suppliers themselves and ensure that they meet our ethical standards.

Furthermore, the Corruption Perception Index (CPI) is regularly used to review and assess the countries of origin of our suppliers.

In addition to these measures, we carry regular audits and assessments of our suppliers to ensure that they comply with our standards. We provide training and support to help our business partners implement our compliance requirements. Through these proactive steps, we promote a responsible and ethical supply chain that meets the highest standards.



# 3. MEASURES FOR COMPLIANCE WITH THE CODE OF CONDUCT

We use various tools to ensure the integrity and efficiency of our business processes. These include the whistleblowing system, the annual due diligence of our business partners, the risk assessment of our business partners and our internal risk assessment, the on-site audits of our suppliers and the annual employee survey.

The whistleblowing system enables employees and external partners to anonymously and securely report any indications of potential misconduct or violations of our guidelines. Due diligence includes a thorough review of

our business partners to ensure that they meet our high standards. Internal and external risk assessment helps us to identify potential risks at an early stage and take appropriate measures to minimise them. On-site audits of suppliers enable us to check compliance with our standards directly with our suppliers. Finally, the annual employee survey provides valuable insights into the satisfaction and needs of our workforce, enabling us to take targeted measures to improve working conditions and our corporate culture.



## 3.1. WHISTLEBLOWING SYSTEM

The HAI Group has set up a whistleblowing system on the website. Equal treatment of all complaints is ensured throughout the entire handling process. Reports can be submitted anonymously. The confidential treatment of incoming reports of violations is guaranteed. A small team within the Compliance department processes the reports in a protected environment. A corresponding process has been developed in the event that irregularities or illegal behaviour are identified.

The HAI Group recognises the importance of an effective system for reporting unacceptable violations of our values. In order to comprehensively ensure 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 notification by post





## 3.2. ANNUAL DUE DILIGENCE AND RISK ASSESSMENT OF OUR BUSINESS PARTNERS

In order to ensure the integrity and reliability of our business partners, we continuously carry out comprehensive due diligence on a reactive basis. This process includes a review and assessment of our partners' business practices, financial stability and legal compliance.

We reactively check whether our business partners comply with all relevant laws and regulations, including compliance with human rights, environmental standards and ethical business practices. This also includes checking for potential conflicts of interest and ensuring that there are no links to illegal activities.

A key component of our due diligence is assessing the risks associated with working with our business partners. These include, for example, financial stability, legal and regulatory requirements, operational risks, social factors, sustainability issues and reputational risks. We analyse potential risks and develop strategies to minimise them. If we find indications of irregularities or breaches of our standards, we take appropriate action, which can range from requesting corrective action to terminating the business relationship.

The financial health of business partners is assessed by analysing annual financial statements, credit ratings and other relevant financial data. We also reactively check whether business partners comply with all relevant laws and regulations, including anti-corruption guidelines

and data protection provisions. We consider operational risks through the efficiency and reliability of our partners' business processes, such as supply chain management, production capacities and quality controls. Social factors such as occupational health and safety, fair working conditions and sustainability issues are assessed. The public reputation of business partners is also assessed to determine whether there have been any negative incidents in the past that could jeopardise trust in the partnership.

Based on the risk assessment, we develop strategies to minimise risks. This may include implementing additional controls, adjusting contractual terms and conditions or conducting regular audits. A thorough risk assessment of our business partners helps us to make informed decisions and ensure long-term, stable business relationships.

Through this due diligence and risk assessment, we ensure that our business partners share and support our high standards. This helps to promote sustainability and responsibility throughout our supply chain and strengthen trust in our business relationships.

If irregularities or even violations of our standards are identified, these can be reviewed again and, if necessary, audited in an on-site inspection.



## 3.3. ON-SITE INSPECTION OF SUPPLIERS

Our on-site audits are an essential part of our quality management. We generally carry out audits in accordance with the strict guidelines of VDA 6.3 to ensure that our suppliers fulfil the high standards we set for our products and services. These quality audits are systematic and detailed to ensure a comprehensive assessment of our suppliers' processes and quality controls.

In addition to these formal audits, we also carry out supplier visits, which are less formal and have the character of an on-site audit. These visits serve to promote close co-operation with our suppliers and support continuous improvement. They offer the opportunity to clarify open questions in an informal setting and to work together on optimisations.

The results of the on-site audit can be summarised in a report by the audited supplier or by us. This report may contain recommendations for corrective actions and improvements. We ensure that the recommended actions are implemented by conducting regular follow-ups. If necessary, additional audits can be carried out to check the effectiveness of the measures.

Through on-site audits, among other things, we can ensure that our business partners and suppliers comply with and continuously improve our high standards. This helps to ensure the quality and integrity of our supply chain and strengthen trust in our business relationships.



## 3.4. EMPLOYEE SURVEY

The annual employee survey is an important tool for measuring and continuously improving the working atmosphere and satisfaction of our employees. The survey provides us with valuable in-sights into the opinions and needs of our workforce, which help us to take targeted measures to improve working conditions and the corporate culture.

Our annual employee survey comprises several important steps. The first step is planning and preparation, during which we develop a comprehensive questionnaire. This questionnaire covers various aspects of the

data is evaluated and analysed. We identify trends, strengths and areas with potential for improvement. The results are summarised in a results presentation, which is communicated top-down to employees by managers and department heads.

Based on the results of the survey, concrete action plans are developed to address identified problems and implement improvements. This can include training, new programmes or changes in company policy. One of the main tools for change are workshops that departments with weaker results organise with the help of HR

Business Partners to identify the problem areas more precisely and work together on solutions.

Finally, we monitor the implementation of the measures and carry out regular follow-ups to ensure that the desired improvements are being achieved. The data is compared and contrasted again in the following year.

We also offer employees the opportunity to provide continuous feedback and contribute to the further development of the company. We make it possible to provide specific feedback on certain measures (e.g. fitness studio) on an ongoing basis and play out target group-specific pulse surveys.

Through the annual employee survey, we promote open and transparent communication and strengthen the trust and satisfaction of our employees. This helps to create a positive working environment and ensure the longterm loyalty and motivation of our workforce.

working environment, including job satisfaction, communication, leadership, professional development and work-life balance.

The survey itself is conducted anonymously and online to ensure a high participation rate and honest feedback. All employees are invited to take part in the survey and contribute their opinions and suggestions.

Once the survey has been completed, the collected





## 4. CLOSING WORDS AND CONTACT

The HAI Group lives its corporate values both internally and externally. The foundation of these values is the success of the company. In order to uphold these values at all times, numerous measures have already been taken, as listed 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.

A code of conduct is crucial as it sets out the ethical principles and standards of behaviour that apply to all employees and business partners. Our Code of Conduct is a living document that sets out our company's ethical principles and standards of behaviour. It serves as a guide for all employees and business partners and helps to promote a uniform understanding of integrity and responsibility. By adhering to 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. Everyone in the HAI Group is encouraged to actively contribute to maintaining and developing these standards.

Employees external 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.

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

A written notification can also be submitted by post:

Hammerer Aluminium Industries Holding GmbH  
For the attention of the Compliance Team  
Lamprechtshausener Straße 69  
A-5282 Ranshofen

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

We encourage all employees and external partners to contact us if they have any uncertainties or suggestions. Your feedback is very important to us to continuously improve our standards and ensure that we fulfil our ethical obligations.

### **The management of the HAI Group**

Version 8, 02/2025

