

## POLICY AGAINST VIOLENCE AND HARASSMENT (V01 04/2025)

### PREAMBLE

HAI is committed to providing a friendly, diverse, inclusive, safe and healthy work environment. We do not tolerate any form of violence or harassment, including gender-based violence. It is our shared responsibility to prevent violent or harassing behavior, establish prevention programs and report violations.

### SCOPE OF APPLICATION

This policy applies to all employees of the HAI Group. Complaints may be made against HAI employees or third parties.

### PROHIBITED BEHAVIOR

Violence and harassment encompass a wide range of unacceptable acts. Gender-based violence and harassment are directed at or disproportionately affect individuals because of their gender or gender identity. HAI prohibits all forms of violence and harassment, including physical, psychological and sexual violence, whether in person, in correspondence or electronically, one-time or repeated, minor or severe. Violence and harassment include physical assault as well as psychological and verbal abuse. This includes behavior such as bullying, mockery, threats and derogatory remarks. These can relate, for example, to a person's sexuality, gender identity, family, ethnic origin, culture, education or economic circumstances, physical or psychological impairments.

#### Sexual violence and harassment can include behaviors such as the following:

- **Assaults** - from unwanted touching or obscene remarks to acts punishable by law
- **Intrusive questions**, e.g.: about a person's private life or physical characteristics
- **Remarks** or jokes about a person's gender identity or sexual orientation
- **Persistent advances** such as repeated invitations to appointments
- **Quid pro quo** - sexual favors in exchange for promises of benefits
- **Inappropriate content** - Sending or displaying inappropriate images, videos, emails or text messages.

### RIGHTS AND OBLIGATIONS OF EMPLOYEES

All employees have the **right** to a work environment free from violence and harassment and to remove themselves from an immediately dangerous situation and report it. At the same time, they are **required to** treat all people with respect; comply with this policy and other internal regulations; report incidents to their supervisor or Human Resources; cooperate with investigations; and maintain confidentiality during investigations.

### RIGHTS AND OBLIGATIONS OF MANAGERS

Preventive measures must be taken to ensure that no one is exposed to violence and harassment, including gender-based violence and harassment. In the event of complaints, it is important to act promptly, fairly and confidentially together with the HR department. Managers are expected to cooperate fully in reporting and providing evidence and to implement measures accordingly. The information collected must be treated in the strictest confidence and only passed on if necessary. It must also be ensured that complainants, victims and witnesses are protected from retaliation.

## COMPLAINTS PROCEDURE

HAI has established the following procedure for filing complaints of violence and harassment. The grievance mechanism is accessible to all. We will treat all aspects of the process confidentially, impartially and fairly. Any person who is a victim of, has knowledge of, or witnesses violence and harassment is required to file a complaint. Details of the complaints procedure are set out in the [HAI Group's Code of Conduct](#) and site-specific company agreements. Questions about the procedure can also be directed to [ethics@hai-aluminium.com](mailto:ethics@hai-aluminium.com)

### Confidentiality and protection against retaliation

All complaints and investigations will be treated confidentially, and information will only be disclosed to those with a need to know. Appropriate measures will be taken to protect the whistleblower, victims and witnesses from retaliation during and after the investigation.

### Support for victims

HAI offers victims support and assistance if required.

### Sanctions and disciplinary measures

Violations of this policy may result in disciplinary action and consequences under employment law, including dismissal. In the event of serious misconduct that could constitute a criminal offense, the police and the relevant authorities will be informed accordingly.

## IMPLEMENTATION AND MONITORING

### Implementation of the directive

HAI ensures that this guideline is passed on to all relevant persons. It will be published on HAI's intranet and website. New employees are required to attend mandatory training on this policy and existing employees must attend annual refresher training. Managers are responsible for ensuring that their employees are informed about the policy.

### Monitoring and evaluation

HAI recognizes the importance of monitoring this policy to evaluate its effectiveness in preventing and eliminating violence and harassment in the workplace

The management of the HAI Group  
Version 01, 04/2025