

# Guidelines for sustainable procurement





# 1. PRINCIPLE

The HAI Group is committed to a responsible and sustainable procurement policy. Our goal is to take ecological, social, and ethical aspects into account throughout the entire supply chain and to actively contribute to sustainable development. This policy specifies the principles enshrined in the Code of Conduct with regard to environmental, social, and governance (ESG) criteria in procurement.

The HAI Group also follows the OECD Guidelines for Multinational Enterprises. These internationally recognized recommendations emphasize the importance of due diligence along the supply chain, respect for human rights, environmental responsibility, transparency, and anti-corruption.

We are committed to not using conflict materials in our products. Conflict materials, also known as 3TG, include tin, tantalum, tungsten, and gold. These raw materials are often mined in conflict-affected or high-risk areas (CAHRAs) – as defined in Regulation (EU) 2017/821 – and/or may contribute to the financing of armed conflicts and serious human rights violations.

We promote a corporate culture of openness and transparency and engage in ongoing dialogue with our stakeholders, including customers, business partners, employees, authorities, communities, local populations, and the media. Feedback on our procurement policy is incorporated into the further development of the policy.

# 2. SCOPE OF THIS POLICY

This policy applies to all employees of the HAI Group, in particular those working in purchasing and supplier management. Managers have a special responsibility for implementing and further developing sustainable procurement practices.

# 3. SUSTAINABILITY CRITERIA IN PROCUREMENT

Suppliers are selected and evaluated based on the following criteria:

- Environment: The HAI Group promotes comprehensive environmental and energy standards along the entire value chain. Suppliers are encouraged to use resource-efficient technologies and processes and to reduce emissions.
- Social: Occupational safety, health protection, fair working conditions, and respect for human rights.
- Governance: Compliance with legal requirements, including anti-corruption and data protection.

# 4. SUPPLIER SELECTION AND DUE DILIGENCE

Suppliers are subject to a risk-based sustainability assessment – new suppliers before the start of the collaboration, existing key suppliers on a regular basis, e.g. through questionnaires, risk analyses based on location, and certificates (e.g. ISO 14001, ISO 45001, ISO 50001).

Local suppliers are generally given preference in order to reduce transport distances and promote regional value creation at the locations.



Suppliers that are considered significant, either because they account for more than 3% of the annual purchasing volume or because their business activities are associated with increased ESG risks (e.g., located in CAHRAs), must be assessed.

## 5. CODE OF CONDUCT FOR SUPPLIERS

Suppliers undertake to comply with the HAI Supplier Code of Conduct, which contains requirements on environmental, social, and compliance issues. Child labor and forced labor are incompatible with the principles of the HAI Group and are strictly prohibited for all suppliers and their subcontractors. The HAI Group expects all suppliers to adhere to anti-discrimination principles, regardless of gender, age, origin, religion, or other characteristics. The Code is publicly available on our website.

## 6. TRANSPARENCY AND TRACEABILITY

The HAI Group documents all relevant information on the origin of materials and services. The aim is to achieve a transparent and traceable supply chain.

Our suppliers must also be able to demonstrate that they have taken appropriate measures to verify the origin of their raw materials and avoid conflict minerals. We expect all our business partners to ensure that their supply chains are free of conflict minerals.

## 7. LEGAL AND REGULATORY REQUIREMENTS IN COUNTRIES OF ORIGIN AND TARGET MARKETS

All suppliers must ensure that their products and services comply with or fully meet the legal and regulatory requirements of the countries of destination or target markets and that they also impose these requirements on their subcontractors. The legal and regulatory requirements of the countries of destination or target markets apply.

## 8. RISK ANALYSIS

When assessing ESG risks, the HAI Group takes particular account of the concept of "Conflict-Affected and High-Risk Areas" (CAHRAs) as defined in the OECD Due Diligence Guidance. Suppliers who source from or operate in such regions are subject to increased requirements in terms of transparency, risk analysis, and documentation. The aim is to identify human rights and environmental risks at an early stage and to act responsibly.

Various indices are checked at regular intervals to ensure that our suppliers and their countries of origin are up to date in terms of human rights, corruption, and high-risk areas. For example, we regularly review the Global Rights Index (GRI), which provides a comprehensive overview of labor rights compliance worldwide. This enables us to assess the countries



of origin of our suppliers and the suppliers themselves and ensure that they meet our ethical standards. In addition, the Corruption Perception Index (CPI) is regularly used to review and evaluate the countries of origin of our suppliers.

In addition to these measures, we conduct regular audits and assessments of our suppliers to ensure that they comply with our standards.

## 9. TRAINING AND AWARENESS

All employees in purchasing receive mandatory training on sustainable procurement. The training on sustainable procurement includes content on ESG criteria, supply chain due diligence, risk identification, and dealing with high-risk regions.

## 10. MONITORING AND KPIS

The following key performance indicators are collected to evaluate the effectiveness of our measures:

- Percentage of suppliers assessed according to HAI Risk Rating
- Training rate in purchasing
- Proportion of local procurement

These key figures are published in the annual sustainability report.

## 11. QUALITATIVE AND QUANTITATIVE TARGETS

The HAI Group aims to systematically improve sustainability in its supply chain. To this end, we have set the following targets:

- Suppliers rated > 90% according to the HAI ESG Risk Score
- Annual risk analyses in all relevant procurement segments
- 90% training rate in purchasing

## 12. WHISTLEBLOWER 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. Confidential treatment of incoming reports of violations is guaranteed. A corresponding process has been developed in the event that grievances or illegal actions are identified.

<sup>1</sup> The HAI Risk Rating is based on analyses using, among other things, the Global Rights Index, Political Risk Index, Fragile States Index, Environmental Performance Index, Climate Performance Index, and Climate Change Performance Index.



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

In the event of confirmed violations of our standards, we will take appropriate measures, which may range from requesting corrective action to terminating the business relationship.

## 13. QUESTIONS ABOUT THE POLICY

Questions regarding the implementation of this policy can be directed to the Purchasing or Metal Management department or sent by email to [ethics@hai-aluminium.com](mailto:ethics@hai-aluminium.com).

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

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