

## **HAI FAIRNESS HAI GROUP CODE OF CONDUCT (V7 6/24)**

This Code of Conduct specifies our beliefs and values. Our values set the standard for our business operations and our conduct towards our employees, customers, suppliers, business partners, government institutions, and anyone else we deal with during our work. We aim to make decisions in a fair, responsible, and respectful manner, and this Code of Conduct serves as a foundation and guide.

### **MUTUAL TRUST**

Mutual trust is central to the cooperation between our HAI Group employees. Our working environment needs us to be energetic and good at making quick, responsible decisions. It offers great opportunities for all of our staff to develop within the HAI Group. This Code of Conduct sets out our other values and convictions, which are based on the core values of the HAI Group. It is up to every employee to uphold these values and to act in accordance with this Code of Conduct.

### **SUSTAINABLE BUSINESS RELATIONSHIPS**

As a supplier of high-quality aluminium products, the success of the HAI Group depends on our customers' satisfaction. How do we achieve this? Through operating fairly, creating long-term business relationships, reliability and delivering the highest quality standards. This creates an environment in which we can continue to deliver this high level of customer satisfaction into the future. We select our suppliers with great care: mutual appreciation, support and sustainable partnerships are key.

### **INDEPENDENCE AND INTEGRITY**

The HAI Group is fully independent. Our economically responsible, fast-paced business requires full compliance with statutory conditions. In accordance with fair competition, we do not tolerate or condone corruption, antitrust violations, bribes, money laundering, gaining unfair advantages, bribery or unauthorized agreements under any circumstances. Inexpensive occasional gifts or invitations are acceptable, provided that these do not lead to any conflict of interest.

The HAI Group will not be influenced in any of its decisions by unfair advantages or grant unauthorized benefits to others. The term "unfair advantages" means anything given for the purpose of influencing a business decision by HAI or a HAI business partner.

We strongly oppose any form of money laundering and use measures to prevent financial transactions from being used for money laundering or terrorist financing.

Compliance with data protection laws, specifically the EU Data Protection Regulation, or GDPR, is mandatory.

The use of copies or counterfeit materials is prohibited. The HAI Group will therefore not tolerate the use, spreading or circulation of copies. We also respect intellectual property, especially intellectual property that is protected by patents, copyrights or trademarks. This must not be used or disclosed without authorisation.

## **FAIR AND SAFE WORKING CONDITIONS**

Our aim is to secure the long-term future of the HAI Group sites and, in turn, our employees' jobs. The HAI Group achieves this by producing a wide range of high-quality aluminium products for different industries through 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. Employees are prohibited from directly or indirectly violating these human rights principles through their actions. The HAI Group supports the general labour rights defined by the International Labour Organization (ILO).

Employees must be made aware of any occupational hazards and safe practices and be allowed to refuse or stop unsafe work.

Fostering trusting, cooperative and respectful relationships with our colleagues, employees and managers, promoting development and training, and focusing on continuous improvement and occupational safety help to ensure employee satisfaction and safe workplaces in a sustainable way. We consider close cooperation with employee representatives and open communication to be a key aspect of maintaining and promoting staff participation. Compliance with legal conditions that protect and keep our staff safe is a matter of course.

Our beliefs and values prohibit all forms of discrimination or harassment for any reason (including discrimination based on age, gender, gender identification or ethnic origin).

We employ and manage our employees on the basis of their abilities and performance alone. Forced or child labour and modern slavery are wholly incompatible with fair working conditions and are therefore prohibited in all HAI Group companies.

## **ENVIRONMENT, ENERGY, SUSTAINABILITY**

We have a responsibility to protect the environment and the climate, so energy efficiency and the use of resource-saving production processes and renewable energy are key. This means we also apply and promote comprehensive environmental and energy standards throughout the HAI Group value chain and our entire production process. We have developed environmental and energy guidelines for HAI Group sites, which must be strictly followed.

The HAI Group uses environmentally friendly technologies and processes in its operations to ensure the sustainable use of natural resources, the reduction of emissions into the air and water and the reduction of noise and greenhouse gas emissions. Soil quality must also be preserved. Industrial waste will be reduced as far as possible, or processed for re-use: the HAI Group requires the use of efficient recycling processes.

The HAI Group is committed to social responsibility and respects the laws pertaining to land, forests, water and waterways. We distance ourselves from the illegal clearance or expropriation of land, forests

or bodies of water.

Alongside protecting the environment, avoiding excessive land use and deforestation is the basis for preserving biodiversity. The HAI Group complies with all national and international legal standards on biodiversity and animal welfare.

## **SAFEGUARDING OUR VALUES**

It is the responsibility of every employee to uphold the values and beliefs in this Code of Conduct and to shape their workplace according to these values. The HAI Group also requires its supply chain partners to comply with these values and to communicate and implement these within their own supply chains. In this way, the HAI Group can sustainably safeguard its values and beliefs throughout the value chain.

The most recent version of the HAI Code of Conduct can be downloaded at any time from <https://www.hai-aluminium.com/en/downloads/>.

## **GRIEVANCES**

The HAI Group recognizes the importance of an effective system for reporting any violation of our values, which is unacceptable. To fully ensure compliance with our values, please report any suspected or actual violations to the Compliance and Legal Department through the following channels:

- Whistleblowing Button in HAI Connect
- Website ([Compliance Line](#))

A written report can also be submitted by post to:

Hammerer Aluminium Industries Holding GmbH  
FAO Compliance Team  
Lamprechtshausener Strasse 69  
A-5282 Ranshofen

Austria The Compliance and Legal Department is responsible for dealing with reports of suspected or actual violations of applicable laws or of the values set out in this Code of Conduct. Incidents relating to corruption, bribery or fraudulent behaviour must be reported. Reports will be taken seriously and investigated accordingly. Reports can also be made anonymously. Employees who report serious misconduct with justified suspicion can do so without fearing negative consequences.

HAI Group Management  
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