

CODE OF CONDUCT

UNSERE MISSION

AMAG Austria Metall AG is a sustainable and profitable premium supplier of rolled products and recycled aluminium casting alloys, as well as ready-to-install components for the aerospace industry, and is regarded as a specialist with a high level of innovative strength in its selected product markets.

AMAG is achieving profitable growth with a balanced ratio of quality products in the close-to-standard sector and specialities.

AMAG is committed to customer orientation as a special trademark. A key success factor in the competitive environment is the prompt and flexible attainment of customer needs.

AMAG stands for quality and reliability, and operates sustainably as one of the largest aluminium recyclers at a single location in Europe and as co-owner of one of the most environmentally friendly and efficient electrolysis plants in the world.

AMAG embraces diversity in its product portfolio, in its consumer landscape and in its workforce, making it a stable partner. AMAG values the human touch in its relationship with all of the company's stakeholders.



CONTENTS



Foreword from the board	04
Company Policy	05
We assume responsibility	06
We believe in fairness in cooperation	08
We conduct ourselves with integrity towards shareholders and authorities	09
We avoid conflicts of interest	10
We protect information and data	12
We engage in trustworthy communications	13
We comply with laws and regulations	14
Reporting misconduct Sustainable supply chain	15

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FOREWORD FROM THE BOARD

Dear Ladies and Gentlemen,

AMAG Austria Metall AG is a supplier of primary aluminium as well as of high-quality recycled aluminium cast alloys and rolled products for applications in a wide range of areas of daily life. Aluminium from AMAG can be found in many everyday products, including aircraft and road vehicles, cable cars, two-wheelers, lighting fixtures, coolers, air conditioning and packaging. Just as our aluminium does its job reliably every day, so do we seek to be a reliable business partner and responsible producer and employer.

Our market value should be determined exclusively by the quality of our services and products. We constantly strive to create added value for AMAG customers in an environment of fair competition. Employees play a central role here. We expect our employees to embody a respectful attitude, open communication and a sense of responsibility when dealing with company resources, the environment, and risks. Our managers act as role models here and thus are also our first advisors on questions relating to business ethics and morality. In addition, we have also appointed a Compliance Committee, which provides professional and legal expertise in an advisory capacity and

reports directly to us, the full management board. This Code of Conduct describes how AMAG Austria Metall AG (AMAG) and all its subsidiaries (the AMAG Group) deal with our special responsibility to society and our business partners, shareholders and employees. Our Code of Conduct thus forms the basis of our daily activities. It is designed to support all employees of AMAG Austria Metall AG and its subsidiaries in fulfilling their moral, legal and ethical responsibilities flawlessly. With this Code of Conduct, we also pass this aspiration on to our business partners. We expect suppliers to actively support our principles and thereby contribute to a transparent and sustainable value chain.

The Management Board of
AMAG Austria Metall AG

COMPANY POLICY

With its strategy of profitable growth, AMAG is pursuing a longterm goal that should be achieved by meeting the highest standards in quality, occupational health and safety, sustainability, environmental protection, and energy efficiency as well as information security in all processes. The requirements of our customers, employees and other stakeholders as well as our legal obligations form the basis of our strategy. Our goal is to meet all requirements and obligations and to continuously improve our performance. The task of every employee is to contribute to achieving this goal, and the task of every manager is to promote and exemplify corresponding procedures. Implementation will be ensured by the AMAG management systems as well as AMAG IT and supported with the appropriate information and resources.

QUALITY

- Delivery fulfillment (quality and deadline)
- Ongoing optimization of technologies, processes and products
- Zero mistakes

OCCUPATIONAL SAFETY

- Continuous improvement of safety & health
- Detection & elimination of potential risks
- Zero accidents

INFORMATION SECURITY

- Continuous improvement of information security (IS)
- Protection of data and information
- Prevention of information security incidents

ENVIRONMENT & ENERGY

- Increasing energy and resource efficiency
- Avoidance & reduction of environmental pollution
- Consideration in sourcing & planning

WE ASSUME RESPONSIBILITY

HUMAN RIGHTS

At AMAG Austria Metall AG, respect for and compliance with Human Rights, both within the company and in the supply chain, are core elements of responsible corporate governance. The rights of employees, in accordance with national constitutional regulations and international Human Rights conventions, enjoy the highest level of protection and highest priority at all locations. All employees are treated according to the principle of equal opportunities – without discrimination due to age, origin (nationality, ethnicity), skin colour, marital status, parenthood, gender, gender identity or sexual orientation, disability, religion, or world view. With the Human Rights Code, AMAG emphasises its commitment to the unconditional compliance and promotion of Human Rights and highlights the core elements of the company's due diligence. The Human Rights Code supplements the Code of Conduct and is binding for all AMAG employees and business partners (suppliers and customers).



Scan the QR code for more information on
AMAG's human rights code.

OCCUPATIONAL SAFETY AND HEALTH PROTECTION

A safe working environment where employee health and satisfaction play a central role is an essential prerequisite for outstanding performance. That is why occupational safety is a lasting component of our integrated management system. Occupational safety committees focusing on health and safety at work have been set up for this purpose. The aim, in line with our zero-accident strategy, is to involve all employees in the systematic identification of risk potentials and implementation of suitable measures for their elimination. Our continuous improvement process (CIP), which was established many years ago, plays a key role here: employees submit suggestions for improving occupational safety that are systematically evaluated and consistently implemented.

These measures to promote occupational health are aimed at creating a safe and pleasant working environment. In addition, we encourage individual employee initiatives on health-related issues. These improve performance and occupational satisfaction overall. AMAG was awarded the seal of approval for promoting health in the workplace for these activities. Our occupational health and safety processes and standards are aligned with, certified and integrated into the existing management system in accordance with the new international ISO 45001 standard.

SUSTAINABILITY

Sustainability is an important value of AMAG's corporate philosophy and is to be understood holistically. Next to ecological goals, sustainability also includes social, human rights and economic aspects. The overriding premise is to reduce the footprint and create added value. The commitment to sustainability is anchored in AMAG's business model and; therefore, clear responsibilities are defined within the company. The sustainability programme, with its ambitious aims, is evaluated in the annual sustainability committee and ultimately approved by the Management Board.

PROTECTION OF THE ENVIRONMENT, NATURAL RESOURCES, AND ANIMAL WELFARE

AMAG is committed to sustainable corporate governance, including the continuous reduction of emissions, the promotion of biodiversity and the monitoring of the company's environmental performance, as well as the implementation of continuous improvement measures. We contribute to the transparent presentation of our environmental performance by means of dialogue with business partners, employees and stake holders as well as through comprehensive reporting on energy and environmental topics in our annual report. In addition, we also comply with national and international legal standards concerning animal protection and animal welfare.

SOCIETY

As a flagship company in the region, we are aware of our responsibility towards our social environment. The growth course we have embarked on is giving a strong boost to the labor market and the regional economy. New jobs are constantly being created in the company. Our investment activity offers numerous opportunities for companies in the regional environment, which in turn indirectly creates or secures jobs. In addition, we primarily support local initiatives and institutions in the areas of education, science and research, social affairs, sports and culture in the form of financial support or in-kind donations.

WE BELIEVE IN FAIRNESS IN COOPERATION

FREE AND FAIR COMPETITION IS IMPORTANT TO US

We are fully committed to free and fair competition, and we respect the laws against restraints on competition in all countries where AMAG is active. We also expect this unreserved commitment from all business partners. We utterly reject unfair commercial practices or agreements with customers, suppliers and competitors. Customers and suppliers must be treated by all employees exclusively according to objective criteria, fairly, and without any preference or discrimination based on personal motives.

The disclosure of misleading information is expressly prohibited. The AMAG Antitrust Guidelines contain detailed rules for avoiding antitrust violations.



WE CONDUCT OURSELVES WITH INTEGRITY TOWARDS SHAREHOLDERS AND AUTHORITIES

INSIDER TRADING

AMAG shares have been listed on the Vienna Stock Exchange since 2011. Insider information (i.e. precise information that is not publicly known but may have a material impact on the market price of a share or share derivative) must be published by a special information dissemination system as quickly as possible. Examples of insider information may include planned acquisitions or divestitures, business strategies, unpublished financial data, planned changes in the management structure, failure of a major customer. The exploitation of such insider information (insider trading) is a crime. All AMAG employees are therefore prohibited from carrying out securities transactions based on insider information.

AMAG has an established Issuer Compliance System to ensure compliance with the applicable provisions of the law (EU Market Abuse Regulation, Austrian Stock Exchange Act). This system regulates the confidential handling of information that could develop into insider information. Confidentiality areas are set up for employees who could have regular or event-related access to such information. The relevant employees are also regularly trained. Blocking periods for trading in AMAG shares (or financial instruments based on them) can be set through the AMAG Issuers Compliance System, either in the context of financial reporting or as warranted. Detailed rules

on preventing the misuse of insider information and on the AMAG Issuers Compliance organization can be found in the AMAG Issuer Compliance Guidelines.

COOPERATION WITH AUTHORITIES

AMAG undertakes to fulfill its obligations of disclosure to the competent authorities in accordance with the applicable legislation.

CORPORATE GOVERNANCE

The Austrian Corporate Governance Code provides Austrian corporations with a regulatory framework for managing and monitoring our company. Austria Metall AG's management board and supervisory board are committed to complying with this regulatory framework for responsible management and control of the company.

WE AVOID CONFLICTS OF INTEREST

In the context of our business activities, situations may arise where the personal economic interests of employees come into conflict with the company's interests. Such a conflict arises not only when actual harm occurs, but as soon as a person's independence, objectivity or loyalty could be influenced by private interests. All employees and managers are required to disclose actual or potential conflicts of interest immediately and in full as soon as they become aware of them or should reasonably have become aware of them. The following sections outline possible forms of conflicts of interest. Disclosure of a (potential) conflict of interest must be made via the manager (or as described in each case). An appropriate solution must be found in the interests of the company, taking into account the applicable legal and internal requirements. If a conflict of interest is not disclosed or if it is accompanied by unlawful conduct (see, inter alia, corruption), this may result in consequences under employment law or other legal consequences.

TRANSACTIONS BETWEEN RELATED PARTIES

Transactions between related parties (e.g. family members) may only be performed on terms that are standard in the industry and with the authorization of the responsible manager, the management board or the supervisory board, as applicable.

SIDELINE ACTIVITIES

Sideline activities can come into conflict with obligations to AMAG or lead to a conflict of interest. Commercial sideline activities of employees are prohibited, if they establish a competitive relationship with AMAG or serve a competitor, customer or supplier. Executives require authorization from the management board to undertake sideline activities, in particular executive or board functions in other companies. This also applies to serving on supervisory or advisory boards in companies outside the Group.

PERSONAL INTERESTS

All AMAG employees must strictly avoid conflicts between their personal interests and the company's interests (e.g. competition with the company when purchasing or selling real property, self-dealing). They understand that even the appearance of a conflict of interest can damage the reputation or interests of the company.

HARASSMENT AND DISCRIMINATION

AMAG does not tolerate any form of harassment, especially sexually or gender-based harassment. AMAG disapproves of any form of discrimination and expects respectful interaction from all employees.

Incidents of harassment and discrimination are investigated in full and remedial actions are taken by AMAG.

PARTICIPATION IN POLITICAL DISCOURSES

AMAG Austria Metall AG takes an active part in political discourses, in order to present the company perspective within the framework of decision-making processes and always acts in an adequate and transparent manner. Therefore, AMAG is in regular dialogue with governments, associations, and interest groups. AMAG ensures that in its dealings with authorities, companies, public officials and politicians, any form of inappropriate influence (benefits, leverage) is strictly prohibited. No payments or benefits in kind to political institutions will be tolerated – such conduct is regarded by AMAG as a breach of its compliance principles. AMAG regularly instructs those responsible for such exchanges and commits them to acting in a legally or morally correct manner.

GIFTS AND INVITATIONS

Gifts and invitations are part of business life in our culture. These customs can come into conflict with the laws on preventing corruption, especially the corruption of public officials. Therefore,

employees are forbidden to accept or give gifts and invitations that are related to a company decision, or even related to obtaining or securing an (official) business transaction contrary to duty.

PREVENTION OF CORRUPTION

There is NO tolerance for corruption at AMAG! We attach particular importance on complying with the relevant laws as well as morally flawless behavior. Corruption includes the payment of bribes, and the acceptance or granting of other (not necessarily financial) advantages in the context of bribery, acceptance of gifts, privileges (aimed at influencing decisions or acceleration of approval and decision-making processes, so called “facilitation payments”) or illegal price agreements. An absolute zero tolerance policy continues to apply to all other criminal activities, such as embezzlement, misappropriation, breach of trust, fraud, blackmail or money laundering. The AMAG Prevention of Corruption Guidelines contains detailed rules on preventing corruption. All employees undergo regular training.

WE PROTECT INFORMATION AND DATA

CUSTOMER AND SUPPLIER DATA

Information from or about customers, suppliers and business partners is treated confidentially and used only for internal purposes.

TRADE SECRETS AND INTELLECTUAL PROPERTY

Trade secrets and intellectual property are subject to special protection, to which all AMAG employees are committed. Trade secrets include any information of value to the company that is not publicly known or accessible. Intellectual property includes among other things patents, brands, and designs - they are important company resources.

PROTECTION OF PERSONAL DATA

The protection and security of personal data is important to us. We therefore process and use your data exclusively in the sense of and in accordance with the principles of applicable data protection laws currently in force. We are committed to securing the data against unauthorized access and have taken extensive technical and organizational security measures in this regard.

DISCLOSURE OF INFORMATION TO THIRD PARTIES

Should it be necessary in exceptional cases to disclose protected data to third parties (e.g. in the context of collaboration with external consultants), we will conclude the corresponding confidentiality agreements.

WE ENGAGE IN TRUSTWORTHY COMMUNICATIONS

We strive for open and honest communication in all areas and with all interest groups.

CORPORATE COMMUNICATIONS

Company information to the public (e.g. press releases and announcements) will be transmitted exclusively via the management board or corporate communications in accordance with clearly defined regulations. This applies to both traditional and digital communication channels.

ELECTRONIC MEDIA

We expect employees to conduct themselves responsibly and in a trustworthy manner when using electronic information media, such as the intranet, email and internet for operational purposes. Access to or use and distribution of content with racist, sexual or other discriminatory background are strictly prohibited. Furthermore, the conduct of private transactions using our electronic media will not be tolerated.



WE COMPLY WITH LAWS AND REGULATIONS

All employees are personally responsible for complying with laws and internal regulations within the scope of their field of activity. They are aware that violations may result in disciplinary actions and may also have consequences under criminal or civil law. They must continually keep themselves informed about updates or changes and take these into account wherever relevant for their activities. They will receive support and information from the responsible departments. An internal control system is also in use.

REPORTING MISCONDUCT

In our common interest, we wish to ensure compliance with the principles in our Code of Conduct. We therefore expect employees to report any identifiable misconduct (e.g. violation of this Code, internal regulations or legislation) immediately.

For this purpose, we provide a communication channel in the form of a Compliance Line that is available both to employees and external stakeholders.

Email: ethics@amag.at
Compliance-Hotline: +43 (0)7722 8012227



Scan the QR code to go directly to the compliance page.

SUSTAINABLE SUPPLY CHAIN

The principles of action set out in this Code of Conduct are also reflected in the ESG requirements for AMAG suppliers and are also contractually passed on to business associates. In addition to the sustainability requirements relating to business management, occupational safety, environmental protection, and energy efficiency, it defines comprehensive principles relating to human rights, such as the right to establish or join an independent employee representative body, fair treatment of employees with regards to reasonable working hours, regular leave of absence and performance-related remuneration. The ESG requirements for suppliers are available on the AMAG website and are incorporated into the General Terms and Conditions of Purchase.

By recognising the ESG requirements, suppliers are expected to promote the implementation of the sustainability requirements specified therein in their respective supply chains. In the event of a violation, the agreement with the supplier can be prematurely cancelled or withdrawn from with immediate effect due to a breach of contract.



For more information on AMAG's General Terms and Conditions of Purchase, scan the QR code.



AMAG Austria Metall AG

Lamprechtshausener Straße 61
5282 Ranshofen
Austria

Phone: +43 (0) 7722 8010

Email: office@amag.at
www.amag.at