

HUMAN RIGHTS CODE



DECLARATION OF PRINCIPLE BY THE MANAGEMENT BOARD

Dear Ladies and Gentlemen,

AMAG Austria Metall AG is committed to the values of innovation, diversity, sustainability and common humanity. These are the four pillars of corporate policy and are therefore firmly anchored in the business model.

As a sustainable and profitable premium supplier of rolled products and recycled cast aluminium alloys as well as ready-to-install components for the aerospace industry, AMAG relies heavily on people, who are healthy, contented and motivated to contribute towards a responsible and successful company. Investments for the Future, pioneering technologies and environmentally friendly products are intrinsically linked and depend on people; therefore, it is important to treat this valuable resource with the utmost responsibility.

Respecting and promoting the compliance of Human Rights is the highest premise of fair and non-discriminatory cooperation and a core element of responsible corporate governance. The rights of employees enjoy the highest protection and the highest priority at all AMAG sites. In addition to applicable (inter-)national legal

requirements, voluntary commitments (see p.6, Human Rights standards and initiatives) form the framework within which AMAG adheres to its responsibility in full as a group and sets high standards for itself and its suppliers.

AMAG Austria Metall AG is committed to prevent negative consequences for people and the environment, which may arise from its business activities and along the value chain, and to end and minimise them as much as possible.

Risk-based due diligence (see p. 8, Clear responsibilities and core elements of Human Rights due diligence) to identify, prevent, eliminate or mitigate Human Rights and environmental impacts as well as monitoring the effectiveness of the measures taken are integrated into AMAG's decision-making processes.

AMAG thereby actively contributes to sustainability and transparency along the aluminium value chain and promotes the implementation of responsible practices also outside the group boundaries.



Mag. Claudia Trampitsch
CFO

Victor Breguncci, MBA
CEO

**Dipl.-Ing. Dr. Alexander
Moser-Parapatits**
CSIO

This code should be the obligatory basis for all managerial positions to show how to comply with Human Rights and to promote them, in particular, in areas in which AMAG can exert its influence as a business enterprise. The Human Rights Code applies to all employees and to business partners such as customers as well as suppliers and complements the AMAG Code of Conduct and all other existing internal guidelines and rules.

It is also aimed at all other stakeholders in order to raise awareness of Human Rights issues and to encourage them to actively uphold their observations and compliance within the scope of their possibilities.

AMAG Austria Metall AG is convinced that by fulfilling its corporate responsibility with regards to the compliance and promotion of Human Rights, both at its sites and along the value chain, it can contribute to a sustainable and liveable society.

The Management Board of AMAG Austria Metall AG

HUMAN RIGHTS STANDARDS AND INITIATIVES

AMAG is involved in various associations and initiatives that deal with the issue of Human Rights and adheres uncompromisingly to Human Rights commitments. These include in particular:

- **International Bill of Human Rights:** (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights)
- **ILO Declaration on Fundamental Principles and Rights at Work:** The aim of the ten core labour standards is the social and fair manifestation of globalisation as well as the creation of decent work as a necessary condition for fighting poverty.
- **UN Global Compact (UNGC):** As a signatory to the UN Global Compact, AMAG is committed to promoting the ten principles set out by the UNGC for sustainable and responsible economic management and development.
- **UN Guiding Principles on Business and Human Rights:** The UN Guiding Principles on Business and Human Rights are a key initiative for the Human Rights responsibilities of companies.
- **OECD Guidelines for Multinational Enterprises:** They are the basis of a multilateral code of conduct to promote responsible business practices within the framework of international trade and commerce.
- **Aluminium Stewardship Initiative (ASI):** In raw material supply chains with a high risk of Human Rights violations, our aim is to create the greatest possible transparency about the preceding stages of the value chain. In this way, we want to identify the critical points in terms of Human Rights and define and implement targeted measures. Compliance with Human Rights is made mandatory by the initiative and verified in the course of ASI certification.
- **Charta of Diversity:** In 2023 AMAG Austria Metall AG signed the Charta of Diversity, thereby underlining its commitment to valuing diversity in general and, particularly to all those who have a connection to the company.

HUMAN RIGHTS AS A CORE ELEMENT OF RESPONSIBLE CORPORATE GOVERNANCE

The principles and values rooted in the specified international standards are also reflected in our own codes and guidelines and form a mandatory framework for our employees (including agency workers), business partners and suppliers.

CODE OF CONDUCT:

The Code of Conduct describes how AMAG and all its subsidiaries deal with the special responsibility they have towards society and towards their business partners, shareholders and employees. In doing so, it supports employees in carrying out their activities in a legally compliant and morally correct manner.

The Code of Conduct can be found on the website of AMAG and is distributed to new employees and via an e-learning training course to read and comply with a final self-assessment. Based on case studies (e.g. bribery, anti-trust law, data protection, conflicts of interest as well as discrimination and harassment), practical guidance is given on correct behaviour.

RESPONSIBLE SUPPLY MANAGEMENT:

Responsible procurement management is used along the supply chain to ensure that a systematic approach is used in order to avoid and

remedy Human Rights violations and negative impacts on the environment as far as possible. The relevant purchasing departments of the companies pursue a systematic approach, which checks significant and risk-based suppliers for their compliance with Human Rights.

ESG REQUIREMENTS FOR AMAG SUPPLIERS:

Our fundamental sustainability requirements for suppliers are expressed here. The principles relating to Human Rights include the right to establish or join an independent workers' council and employee representation, fair treatment of employees in terms of reasonable working hours, regular leave of absence/holiday entitlement and performance related pay.

They are available on the AMAG homepage and are integrated into the General Terms and Conditions of Purchasing by AMAG. Suppliers are expected to implement the sustainability requirements specified therein in their respective supply chains.

CLEAR RESPONSIBILITIES AND CORE ELEMENTS OF HUMAN RIGHTS DUE DILIGENCE

Responsibility for the upholding of Human Rights lies with the Executive Board. It promotes the topic together with the respective departments (Purchasing, Legal Affairs, Human Resources, Occupational Health Care, Sustainability, Communication) and receives corresponding reports. The Management Board in turn regularly informs the Supervisory Board as the highest supervisory body, that fulfils its duties with regard to economic, ecological and social responsibility and thus all ESG – areas of the company. The status of actions taken and the objectives on Human Rights issues are reported to an annual sustainability committee. The committee consists of the Executive Board and the heads of the respective departments. Any notifications of Human Rights violations by suppliers and employees are published annually in the report as part of sustainability monitoring.

Our process for fulfilling Human Rights due diligence is based on applicable laws, internationally acknowledged standards as well as voluntary commitments. The Due-Diligence-Process of AMAG

basically includes four steps that are presented on the following page. In order to identify and assess impacts on Human Rights due to business activities or along the supply chain in the best possible way, AMAG is in close dialogue with both external and internal stakeholders and their representatives. AMAG's aim is to demand compliance with Human Rights both in its own business area and along the supply chain, to review these on a risk basis and to create suitable remedial measures or measures for redress in the event of actual or potential negative effects. The due diligence process, which is primarily anchored in the area of responsible procurement management, is continuously being developed and adapted as required, for example due to changes in Human Rights conditions in countries or regions.

The four pillars of Human Rights Due-Diligence at AMAG Austria Metall AG:

1. Identification of Risks: Our ongoing activities are regularly reviewed for the risk of Human Rights violations - with the aim of minimising, real and potential, adverse impacts on Human Rights within the scope of business activities along our value chain. We look at Human Rights risks within the framework of comprehensive risk management from two perspectives. The inside-out perspective is concerned with the Human Rights impacts that arise from the company business activities and its value chain. The outside-in perspective examines the risks that can affect the business activity and the value chain from the outside

2. Due-Diligence-Integration and Implementation of complaint mechanisms: As part of responsible procurement management, the purchasing departments of the AMAG companies carry out risk evaluations for key suppliers at defined intervals and on an ad hoc basis, and define suitable measures to prevent, mitigate or end Human Rights impacts. Both, internal and external stakeholders have several channels at their disposal to report negative impacts on Human

Rights or to comment anonymously on measures taken. More information on this can be found in the Compliance reporting system section (see p. 10)

3. Effectiveness monitoring: The effectiveness of the measures taken is monitored once a year or when a risk becomes apparent. Among other things, the purchasing departments report on the progress and results of the risk evaluation as well as potential for optimisation. Based on these reports, top management may specify changes and follow-up measures.

4. Reporting and Communication: The goal of complying with the basic principles of Human Rights at AMAG and along the value chain is a key component of the business part of the business model and the AMAG sustainability programme. This is integrated into the non-financial declaration of the annual report and is also carried out during the year. Violations and measures are reported in a transparent way, internally and externally.

COMPLIANCE REPORTING SYSTEM

AMAG values honesty, integrity, and transparency. In our common interest, we want to ensure that our principles of behaviour are complied with. Therefore, recognisable misconduct (e.g. violation of our Code of Conduct, Code of Human Rights, internal regulations, or legal regulations) should be reported immediately. Reports can be made via several channels. They are processed exclusively by responsible persons in the internal reporting office. Reports can be submitted by employees as well as by external persons anonymously or by stating their name. AMAG assures that the identity of the whistleblower will be treated with absolute confidentiality and that no retaliatory measures, due to their reporting, will be taken against whistleblowers.



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



COMPLIANCE WITH HUMAN RIGHTS IN AMAG AUSTRIA METALL AG

AMAG Austria Metall AG respects Human Rights and is committed to fair and dignified working conditions both within its own business activities and along the supply chain. This section sets out the Human Rights and labour rights that are of particular importance to AMAG and its suppliers, and must be observed by all employees and business partners.

Prohibition of child labour: AMAG Austria Metall AG does not tolerate any form of child labour. The company complies with all standards and laws concerning age, scope and areas of employment in particular the core labour standards of the International Labour Organisation¹ the Child and Youth Employment Act (KJBG), the Ordinance on Employment Prohibitions and Restrictions for Young People (KJBG-VO) and the Compulsory Training Act (APfG). The minimum age for entry into employment age of 15 years and the minimum age of 18 years for activities that may pose a potential risk to physical and mental health, safety and morals must be taken into account. At AMAG Austria Metall AG, young people who have not yet reached the age of 16 are exclusively in a training relationship with AMAG or are completing an internship. Prior to recruitment an age check (ID card) is carried out.

Prohibition of forced labour: AMAG does not tolerate any form of compulsory or forced labour, from slavery, including modern slavery or human trafficking as well as serfdom and debt bondage. The relevant core labour standards of the International Labour Organization²

are to be complied with and recruitment and employment practices are aligned with them, without exception.

The freedom to establish workers' unions and the right to collective agreements for fair salaries within the relevant industry:

AMAG recognises the right of all employees to form employee representative bodies and to engage in collective negotiation concerning salaries and the regulation of working conditions. All employees have the right to join or form associations of their choice or to stand as a candidate in works council elections. Employees shall not be discriminated against on the basis of their membership or non-affiliation in a workers' union.

AMAG Austria Metall AG complies with the relevant ILO core labour standards³ and all applicable (inter)national laws. The Executive Board and the works council carry out negotiations in a constructive manner, openly and strictly confidential in the best interests of the employees. The aim is always to find the optimum solution between the economic interests of the company and the interests of the employees.

Diversity and equal opportunities: AMAG Austria Metall AG is committed to equal opportunities within the company, treats all employees fairly and promotes individual development potential, for example through training and further educational programmes. AMAG has anchored diversity as a core value in its business strategy, and the signing of the Charta of Diversity highlights its commitment to recognising and promoting diversity and an inclusive working environment.

Protection against discrimination: AMAG rejects any form of discrimination and expects its employees to treat each other with respect. Characteristics such as age, origin (nationality, ethnicity), skin colour, marital status, parenthood, gender, gender identity, sexual orientation, disability, religion or world view are essential components of identity and are therefore particularly worthy of protection. Discrimination on the basis of these characteristics is strictly prohibited. AMAG complies with all legal requirements and the relevant

ILO core labour standard⁴. The commitment to non-discriminatory behaviour is also firmly established in the Code of Conduct.

Working hours: AMAG Austria Metall AG guarantees all employees working hours that comply with the respective local legal requirements or industry standards. At the Ranshofen site, the relevant laws are additionally complied with the valid legally binding contractual agreements for the trade association of the non-ferrous metal industry⁵ and by the works agreement pursuant to § 97 (1) 2/13 ArbVG on working hours at AMAG. Such additions to existing laws only lead to further improvements for employees, otherwise they are ineffective. Among other things, employees are entitled to work breaks, reasonable working time limits (maximum daily working hours) as well as regular paid holidays, and employees can also take advantage of flexible working time models (flexitime and part-time models, partial retirement). AMAG also offers its employees further measures to harmonize work and private life.

¹ILO-convention No.138 and No.182

²ILO-convention No.29, No.105 and Protocol on Forced Labour (2014)

³ILO-convention No.87 and No.98

⁴ILO-convention No.111

⁵ Collective labour agreement in the version applicable for the Non-Ferrous Metals Industry Association; framework collective labour agreement, supplementary collective labour agreements and salary regulations for employees in the industry in the version applicable for the Non-Ferrous Metals Industry Association

Right to education and fair wages: AMAG Austria Metall AG promotes sustainable talent management, which is ensured through appropriate training and further educational measures. Employees are supported and motivated to realise their talents and potential. To maintain a performance-enhancing working environment, AMAG ensures fair wages in line with the statutory minimum wage relevant for the place of employment and is based on the principle of equal pay for work of equal value regardless of gender⁶. AMAG's remuneration system generally combines competitive basic remuneration with extensive additional benefits.

Health & safety at work: AMAG Austria Metall AG is committed to ensuring the safety and health protection of all employees in compliance with the statutory regulations, the ILO core labour standards⁷ and voluntary commitments, and to continuously improve them. The company relies on comprehensive preventive measures and pursues a „zero-accident strategy“. Extensive safety instructions, training programmes and workshops, as part of the continuous improvement process (CIP), serve to achieve the goals. 100% of the employees and temporary workers at the Ranshofen location are represented by a management system for occupational health and safety. The process and standards in the area of safety at work comply with the requirements of the international EN ISO 45001 code and are integrated into the existing management system. AMAG Occupational Medicine and Health Protection programme are the central point of contact for all health- related topics, such as first aid, medical examinations, health promotion and counselling. In order to ensure safe cooperation with external companies, external workers

must complete a digital safety briefing with additional checks for understanding.

Protection of personal data: We ensure the lawful processing of personal data with respect for the fundamental rights and freedoms of individuals and in particular the fundamental right for data protection (Data protection policy applicable throughout the company, data protection declarations).

Protection of Human Rights defenders: Austria Metall AG is committed to protecting those individuals and groups who defend Human Rights and may be threatened, intimidated, defamed or criminalised as a result. AMAG stands for an open and constructive exchange with Human Rights defenders and is involved in organisations and initiatives (e.g. UN Global Compact, respACT).

Use of security personnel: AMAG does not employ security staff. The tasks of the AMAG plant guard at the main site in Ranshofen are clearly defined and demarcated in a procedural instruction. In order to ensure controlled access management in the sense of site and property protection, AMAG has implemented further guidelines and procedural instructions. For all security-relevant incidents, responsible persons are appointed, who must be notified and initiate follow-up measures. All persons acting here are bound by legal requirements and internal guidelines and are specially trained in Human Rights. If AMAG has to utilise external security service providers, the company provides comprehensive instruction to ensure that Human Rights are respected.

⁶ ILO-convention No.100

⁷ ILO-convention No.155 and No. 187



FOCUS

SUPPLY CHAIN MANAGEMENT

AMAG is committed to the observance of Human Rights and improving the living and working conditions along the supply chain. This commitment extends to all adverse Human Rights effects that are (potentially) caused, to which the company contributes or to which AMAG is directly linked. Together with business partners, the aim is to minimise the risks through responsible action as well as the creation of stable and longterm relationships. The systematic approach to respecting and upholding Human Rights is applied to major suppliers and, on a risk basis, with indirect suppliers in the course of the procurement of alumina.

Bauxite mining: The primary material for the production of alumina is bauxite. Bauxite is found in countries that have a great diversity of plants and animals (Australia, West Africa, Jamaica, Brazil). Minimising the negative impacts on biodiversity and on the needs of local communities, with regard to land conservation and land use, are therefore of fundamental importance.

Although the business activities by AMAG do not include bauxite mining, AMAG is aware of the potential social impacts on indigenous peoples. Through memberships in initiatives such as AD (Aluminium Deutschland), ASI (Aluminium Stewardship Initiative) or EA (European Aluminium), AMAG contributes to the definition and implementation of sustainable standards in the aluminium industry.

Alumina production: The Canadian Alouette electrolysis plant, in which AMAG holds a 20% stake, produces high-quality primary aluminium using electrical energy, alumina and petroleum coke. In line with its 20% share, AMAG is obliged to supply alumina for the

production of primary aluminium. A specific procedural guideline regulates the ongoing implementation of responsible procurement management for alumina. For the Alouette's alumina supply, the Alouette partners agreed to prioritise the sourcing of alumina from ASI-certified sources. This confirmation of compliance with comprehensive sustainability standards by the ASI, an independent institution, is a key element in ensuring transparency and quality.

Purchase of raw materials for the production of semi-finished products: When purchasing raw materials, AMAG, as a member of ASI, is committed to responsible procurement management for all key suppliers and service providers. A procedural instruction defines the procedure for the risk evaluation of key suppliers as well as the definition and monitoring of measures. As part of its corporate due diligence, AMAG demands standards regarding environmental protection, social rights and responsible corporate governance along the supply chain. Suppliers are required to comply with ESG requirements.

Monitoring of selected raw material supply chains: Tantalum, tin, gold and tungsten originating from conflict or high-risk areas, such as the Democratic Republic of the Congo or its neighbouring countries (the 'DRC' countries), are defined as 'conflict minerals'. In addition, cobalt, mica, graphite, lithium, nickel and copper are classified as 'extended conflict minerals'. Suppliers are required to provide information if the use of these raw materials is necessary for the functionality or manufacture of the products or raw materials they supply. AMAG continuously checks whether the above-mentioned minerals are necessary for the functionality or manufacture of the products. Where necessary, the origin must be verified by means of documentation from upstream suppliers. For certain alloying metals (including manganese, magnesium and silicon), the risk associated with the origin of materials in relation to human rights violations also tends to be moderate to high; for this reason, the assessment and evaluation of these suppliers as part of responsible procurement management may be carried out at shorter intervals where necessary.

Product manufacture, usage and security: The aim of AMAG Austria Metall AG is to design and produce all aluminium products as sustainable as possible in order to make a contribution to climate and environmental protection and, in line with responsible

value creation, to help customers achieving their own environmental goals in the best possible way. The commitment to the principle of sustainability includes the objective of protecting the health and safety of all those who come into contact with AMAG products. The European chemicals regulation REACH and the CLP regulation⁸ on the classification, labelling and packaging of substances and mixtures - including aluminium and alloy metals - impose various obligations and tasks on manufacturers, importers and users of chemical substances. Legal developments in this area are constantly monitored. The AMAG subsidiaries fulfil the legal obligations in their roles as manufacturers of aluminium products, importers of raw materials and downstream users of many operating materials.

In addition, AMAG strictly adheres to the export compliance regulations and the relevant provisions of the Foreign Trade and Payments Act. Furthermore, a system-supported embargo review is carried out (checking whether the agreed recipient country is subject to economic sanctions or an arms embargo).

AMAG Austria Metall AG affirms that it does not participate in any direct or indirect financing or other support of non-state armed groups.

⁸ REACH-regulation (CE) 1907/2006 and CLP-regulation (CE) 1272/2008

FOCUS SOCIETY AND LOCAL COMMUNITIES

AMAG pays attention to the impact of the company's activities on the neighbourhood and society in general and takes measures where necessary. In order to obtain a better understanding of the interests and needs of local communities that are affected by AMAG's activities, their demands and expectations are regularly and systematically analysed. This includes surveys (e.g. on the AMAG website), personal discussions and dialogues at local, national and international levels, topic-related stakeholder events at the Ranshofen site or communication via social media.

Environmental protection and conservation of biodiversity:

AMAG Austria Metall AG is committed to sustainable corporate management, which includes the continuous reduction of emissions, the promotion of biodiversity and the monitoring of the company's environmental performance and the implementation of measures for continuous improvement. As we are in dialogue with our employees, business partners and other stakeholders and through the comprehensive reporting on energy and environmental issues in the annual report, we contribute to the transparent presentation of our environmental performance. In addition to considering the environmental impacts of business activities within the framework of the certified environmental management system (ISO 14001), processes have been implemented that regulate the handling of deviating conditions. A corresponding environmental incident and crisis management specifies responsibilities and measures in the event of unplanned

operating conditions (= incidents). However, top priority is to prevent the undesired release of substances and thereby exclude the risk to people and the environment.

Responsible corporate governance: AMAG Austria Metall AG strictly complies with all relevant laws and is committed to the principles of the Austrian Code of Corporate Governance and its responsible corporate management and control which forms the basis for sustainable value creation. The company has a comprehensive compliance system with guidelines, audits and trainings. The AMAG Anti-Corruption, Antitrust, Issuer Compliance, Data Protection and Commercial Agents Directives set out requirements in this regard. AMAG behaves with integrity towards all business partners and authorities. It is committed to fulfilling its duty of disclosure to authorities in accordance with the applicable legal provisions.

This Human Rights Code supplements the AMAG Code of Conduct in its most recent version. No individual claims or claims by third parties can be derived from it. The German version of this Code is legally binding.

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