

CODE OF CONDUCT

AMAG Austria Metall AG

04/2022

Foreword from the board

Dear readers,

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 aluminum 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 our customers in an environment of fair competition. Our 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.

COMPANY POLICY

With its strategy of profitable growth, AMAG is pursuing a long-term goal that should be achieved by meeting the highest standards in quality, occupational safety and health, environmental protection and energy efficiency 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.

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

ENVIRONMENT & ENERGY

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



Implementation will be ensured by the AMAG management systems and supported with the appropriate information and resources.

A handwritten signature in black ink, appearing to read 'H. Kaufmann'.

Dr. Helmut Kaufmann
Chief Operating Officer
(COO)

A handwritten signature in black ink, appearing to read 'Gerald Mayer'.

Gerald Mayer
Chief Executive Officer
(CEO)

A handwritten signature in black ink, appearing to read 'Victor Breguncci'.

Victor Breguncci
Chief Sales Officer
(CSO)



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The entire world

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1.

We assume responsibility

ENVIRONMENTAL PROTECTION AND NATURAL RESOURCES

As a responsible company, the responsible use of the environment and rapidly diminishing natural resources is an integral component of our corporate strategy. We set high technical and ethical standards in this area and are continually improving our performance. These principles and goals are enshrined in our management system and include not only efficient use of natural resources, but also improving energy efficiency and minimizing emissions and waste. Based on our comprehensive certifications in environmental (ISO 14001) and energy management (ISO 50001), AMAG fulfills these requirements in an exemplary manner.

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.



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.

SUSTAINABILITY

AMAG's sustainability strategy comes under the motto "adding value through appreciation". This guiding concept verifies the success story of recent years, demonstrating that sustainability and positive economic development go hand in hand and can lead to a win-win situation for the environment, society and the company.

2.

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 our 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.



3.

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 an 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.

4.

We avoid conflicts of interest

In the context of our business activities, situations may arise where the personal economic interests of our employee(s) come into conflict with the company's interests. We expect our employees to act exclusively in accordance with the interests of the company. They must inform their supervisors about any existing or potential conflict of interest and work with them to find a solution that avoids or at least minimizes the conflict of interest. Internal regulations contain corresponding instructions.

AVOIDING CORRUPTION

There is NO tolerance for corruption at AMAG! We particularly emphasize compliance with the applicable laws as well as morally and ethically 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 or privileges (aimed at influencing), illegal price agreements, etc. 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.

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.

Our employees are therefore 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.

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.

SEXUAL HARASSMENT

We do not tolerate any kind of sexual harassment in the workplace and expect individuals to treat each other with respect. The display of inappropriate images is also forbidden in all areas of the company.

AMAG rejects all forms of discrimination. Every person is unique, valuable and has their own individual skills. AMAG is committed to equal opportunities in the employment market and complies with all legislation forbidding discrimination, particularly on the basis of age, gender, skin color, sexual orientation, origins, religion or disability. Discrimination is not tolerated.

5.

We protect information and data

CUSTOMER AND SUPPLIER DATA

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

TRADE SECRETS

Trade secrets are subject to special protection, to which all AMAG employees are committed. These include any information of value to the company that is not publicly known or accessible (e.g. purchase prices, sales prices including the manner of calculation, production quantities, processes for manufacturing, research or development). Employees are subject to this obligation, even after they leave the company.

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.

6.

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.



ELECTRONIC MEDIA

We expect our 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.



7.

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.

8.

Reporting misconduct

In our common interest, we wish to ensure compliance with the principles in our Code of Conduct. We therefore expect our 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 our employees and our external stakeholders.

COMPLIANCE LINE

Information can be submitted using the following email address or telephone number:

- ethics@amag.at
- +43 7722 801 2227

AMAG guarantees that all reports will be processed anonymously. The identity of the informant will be treated confidentially.



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