

# HUMAN RIGHTS CODE



# DECLARATION OF CONDUCT BY THE MANAGEMENT BOARD

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Dear Ladies and Gentlemen,

AMAG, as a supplier of high-quality aluminium products, is committed to respect Human Rights on the basis of the UN Guiding Principles on Business and Human Rights. We consider it our duty to avoid negative influences through our activities, and also demand this from our business partners. The due diligence process to identify, prevent and mitigate Human Rights impacts is integrated into our decision-making.

As a founding member of the „Aluminium Stewardship Initiative“ (ASI) we are actively contributing to sustainability and transparency along the aluminium value chain and promote the implementation of responsible practices. This Code is intended for our stakeholders in order to raise their awareness of Human Rights and encourage them to actively participate in the protection and observance of Human Rights whilst complying with the applicable law. It applies in particular to employees and business partners such as customers and suppliers and complements our Code of Conduct as well as all other existing guidelines and rules. All managerial staff should exemplify and promote the compliance of Human Rights.

The responsibility of AMAG for the protection of Human Rights applies equally to employees and business partners, surrounding communities and society as a whole. We concentrate on topics and areas of action in which we can exert our influence as a business corporation. Our commitment to promoting Human Rights applies to all of our company locations.

We uphold and promote Human Rights in three different complementary ways:

- in our business activities by adhering to our values and standards
- in our relationships with suppliers and business partners
- by working with external initiatives such as the UN Global Compact or ASI

The Management Board of  
Austria Metall AG

# MEMBERSHIPS IN INDUSTRY ASSOCIATIONS AND INITIATIVES

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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**

- **ILO Declaration on Fundamental Principles and Rights at Work**

- **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.

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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, 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 homepage 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 Human Rights violations 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.

**Compliance regulations for 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 CONTINUOUS FOCUS ON THE ISSUE OF HUMAN RIGHTS

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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 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.



# CORE ELEMENTS OF HUMAN RIGHTS DUTY OF CARE

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Our Human Rights due diligence process is based on the UN Guiding Principles for Business and Human Rights. The derived concept requires that companies establish procedures to identify potential and actual negative impacts on people and to take measures to prevent such impacts, avoid, terminate or, where harm has already occurred, to remedy it.

In particular, the Human Rights due diligence process is integrated into the responsible sourcing process, which follows a risk-based approach.

This process includes **five building blocks**:

## **1. Accepting responsibility:**

Declaration of principles, anchoring of Human Rights goals in the sustainability programme, codes & guidelines on respect for Human Rights

## **2. Identify and minimise risks:**

Our ongoing activities are regularly reviewed for the risk of Human Rights violations - with the aim of minimising adverse impacts on Human Rights along our value chain. We look at Human Rights risks

from two perspectives. The inside-out perspective is concerned with the Human Rights risks that arise from the company's business activities. The outside-in perspective examines the risks that can affect the business activity from the outside.

## **3. Establishment and integration:**

E-learning training on the Code of Conduct or on Human Rights creates an internal awareness. All employees are familiarised with the AMAG Code of Conduct when they join the company. This is further deepened in an online training course with a final self-assessment. Departments that deal with Human Rights issues - in particular Human Resources, Sales, Purchasing and Communication - receive recommendations for action with regard to Human Rights within AMAG and along the entire supply chain.

## **4. Inform & report:**

The goal of ensuring that suppliers and AMAG comply with the basic principles of Human Rights are the main components of AMAG's sustainability programme. This is integrated into the non-financial declaration of the annual report and is also carried out during the year. The associated measures are implemented by the respective departments depending on the Human Rights aspect.▶

## 5. Appeal and complaints procedures to be set up:

Any violation of Human Rights or applicable law can be reported via the compliance hotline and will be consistently monitored by the responsible departments. **It is available to employees and the general public alike.**

The complaints management process thereby enables, among other things, to draw attention to possible Human Rights violations at suppliers. The identity of the informers are kept confidential and all reports are handled anonymously by the Legal and Communication departments. It is also possible for employees to contact the HR department directly, if an act of violation occur.

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**E-Mail:** [ethics@amag.at](mailto:ethics@amag.at)

**Compliance-Hotline:** +43 7722 801 2227



 [www.amag-al4u.com/compliance-line.html](http://www.amag-al4u.com/compliance-line.html)

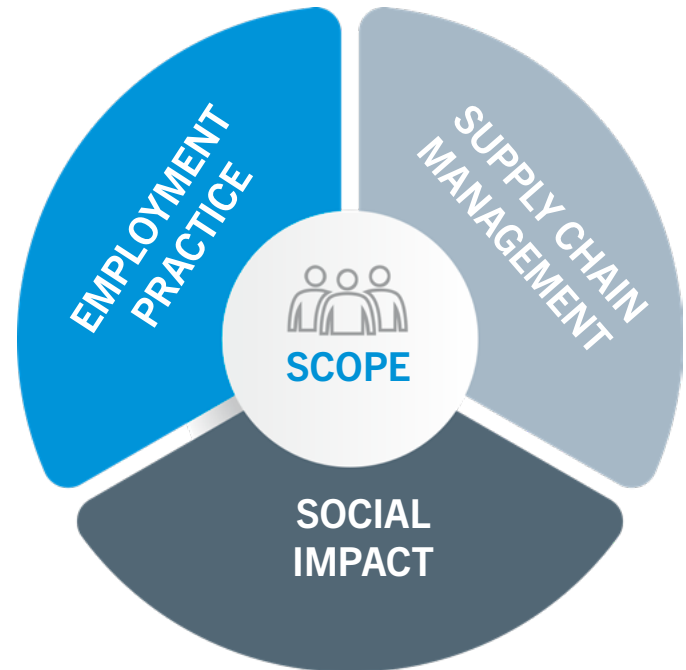


## SCOPE OF APPLICATION

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At AMAG, the topic of Human Rights encompasses responsibilities in the three areas of application:

- Employment practices with regard to the rights of persons employed by the company
- Supply chain management with regard to the rights of persons, affected by the business activities of business partners
- Social impact with regard to the rights of persons living in societies that are influenced by the company (e.g. neighbourhood, residents)



# 1. EMPLOYMENT PRACTICES:

## COMPLIANCE WITH HUMAN RIGHTS AT AMAG

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AMAG respects the Human Rights of its employees and aims to exceed minimum standards in working conditions. Managers have a special role model function in this respect. They exemplify the values and thereby integrate them into day-to-day management. Internal guidelines and processes promote respect for workers' rights and serve to protect against discrimination. The following sections describe the key issues for AMAG relating to Human Rights and working conditions, namely the rights of employees:

### **Diversity and equal opportunities:**

AMAG is committed to equal opportunities on the labour market and complies with all relevant laws that prohibit discrimination, particularly on the basis of age, gender, skin colour, sexual orientation, origin, religion or disability.

### **Protection against discrimination:**

AMAG rejects any form of discrimination and expects its employees to treat each other with respect. The commitment to non-discriminatory treatment is set out in the Code of Conduct. Any violation of Human Rights or applicable law can be reported via the compliance hotline.

### **Fair employment and working conditions (including right to further training, reasonable wages, working hours):**

AMAG places great emphasis on not making any gender-dependent differences in terms of pay. The salary policy of the company stipulates strict and equal treatment of all genders. The remuneration system

combines a competitive basic remuneration package with extensive additional benefits. The company working hours are laid down in a company agreement and apply to all employees. It is based on the regulations of the currently valid Working Hours Act.

Flexible working time models range from flexitime and part-time models to part-time work for older employees. Employees are provided with comprehensive training opportunities and an appropriate feedback culture (e.g. through the annual appraisals and development meeting) has been established.

### **Health & safety at work:**

In the area of occupational safety, the principle is „zero tolerance for accidents“. 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 processes 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. AMAG attaches great importance to ensuring that the employees of external companies can also work safely on the AMAG premises. AMAG also expects its suppliers to actively support the fulfilment of these principles in the areas covering occupational safety by integrating them into their own business practices.

#### **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).

#### **The freedom to establish workers' associations 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' association. 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.

#### **Prohibition of child and forced labour:**

AMAG does not tolerate any form of child, compulsory or forced labour. The relevant standards of the International Labour Organisation are respected, in particular the non-participation in forced labour, debt bondage and child labour.

## 2. SUPPLY CHAIN MANAGEMENT: COMPLIANCE WITH HUMAN RIGHTS IN THE SUPPLY CHAIN

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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 long-term 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). Minimizing negative impacts on biodiversity or land conservation and use is therefore essential.

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 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. The basis for requirements placed on AMAG

suppliers is formed by the „Compliance Rules for AMAG Suppliers“, which include environmental, corporate-governance and social aspects. The supplier rating and risk evaluation is based on a scoring system, which assesses four areas. The total number of points obtained by the supplier results in the overall risk.

The first area includes confirmation of the compliance rules for suppliers. A risk rating (low, medium, high) is then assigned at the country level. A further assessment includes questions on material origin, recognised certifications as well as key questions in relation to compliance with Human Rights, labour and social legislation, environmental protection or health and safety of employees, which are to be signed by the supplier.

#### **Monitoring of selected raw material supply chains:**

Since January 2021, the EU Regulation on Conflict Minerals has been in force. It aims to curb trade of tin, tantalum, tungsten and gold, some of which helps to finance armed conflicts and requires companies to ensure that such minerals are sourced from conflict-free sources. Suppliers have an obligation to provide information in the event that conflict minerals need to be used for the functionality and manufacture of the products they supply. AMAG also continuously checks whether such minerals

are necessary for the functionality or the manufacture of its products. If necessary, communication with suppliers is used to ensure that the named minerals do not originate from conflict or high-risk areas, such as the Democratic Republic of the Congo or DRC countries (neighboring countries of the Democratic Republic of the Congo).

#### **Product manufacture and utilisation:**

AMAG focuses on innovative and sustainable products that make a special contribution to climate protection. 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 potential environmental impact of a product is assessed, for example, via CO<sub>2</sub> footprints.

AMAG expects its business partners to respect AMAG's values and principles in their own business practices and actively support them. 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).

### 3. SOCIETY AND NEIGHBOURHOOD:

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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 homepage), 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:**

The preservation and promotion of biodiversity are important components of the commitment to sustainability. AMAG concentrates on green space management on the company premises and on the sustainable management of its own forest, with the aim of increasing the ecological value of the forest on an ongoing basis.

AMAG endeavours to minimise its impact on nature in terms of construction activities in order to protect the animals and plants living in the surrounding area. In addition to considering the environmental impacts of business activities within the framework of the certified environmental management system, 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.

#### **Corruption and bribery:**

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.

#### **Products of the company:**

Companies must fulfil their duty of care (due diligence) in order to avoid product defects. The industries supplied by AMAG demand the highest product quality. For example, high-strength and lightweight materials are in demand here, which are optimally tailored to customer requirements and offer low weight, strength, energy absorption and excellent formability as well as recyclability. This is made possible by many years of know-how as a supplier to demanding industries.



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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.

**Impressum:**

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**Media owner and layout:** AMAG Austria Metall AG  
P.O. BOX 3, 5282 Ranshofen, Austria

**Pictures:** AMAG Austria Metall AG, Adobe Stock

**AMAG**  
AUSTRIA METALL

**AMAG Austria Metall AG**  
P.O. Box 3  
5282 Ranshofen  
Austria

T +43 7722 801 0  
F +43 7722 809 498  
md-amag@amag.at  
[www.amag.at](http://www.amag.at)