



Progress in Aluminium

Code of Conduct & Business Ethics

July 2023

COMPLIANCE
The Power of Integrity

**Binding principles of conduct of the
SAG Group**

POLICIES & STATEMENTS

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Change history

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1. Preamble

Dear colleagues,

our great employees come first and foremost! We treat each other with respect and encourage open and honest communication in a balanced, safe and welcoming workplace. Our diverse, equal and inclusive culture attracts passionate and inspired employees and develops them further. The safety of our team members is our ultimate goal and a basic requirement of everything we do. Our team is committed to continuous improvement. Adhering to the highest standards of integrity, ethics and social responsibility are part of SAG's corporate culture and should be a matter of course. This is laid down in our "Leonardo" company mission statement.

The newly created **Code of Conduct & Business Ethics** summarises in a compact form the principles of **business ethics** and guidelines for our conduct in daily business life. The SAG Code of Conduct applies to all our employees, regardless of their function, location or seniority in their interactions with colleagues and business partners. As a globally active company, we see it as our mission and responsibility to take cultural, social and economic differences into account in our actions and decisions. We invite you to familiarise yourself with this document, to raise awareness of it in your everyday life and to live the principles it contains in your daily work.

Thank you for your commitment and dedication to our shared values.



Dr. Karin Exner-Wöhrer

Chair of the board



Dr. Dieta Dorninger

Executive Board



Teresa Heiss

Legal Compliance

2. Scope

The Code of Conduct of the SAG Group (hereinafter referred to as SAG) is the basis of our daily actions. It applies to all employees of the SAG Group including subsidiaries.

We have clear standards regarding ethics, morals and respect, which we also expect from our business partners. For us, it goes without saying that anyone acting on behalf of SAG must comply with applicable laws and internal rules.

This Code of Conduct is intended to support all of us in carrying out our business activities with responsibility and integrity. We are all required to act responsibly and prudently. We must not abuse our position for personal gain, nor condone behaviour that is not in accordance with this Code of Conduct.

Each and every one of us is jointly responsible for the implementation of and compliance with the Code of Conduct!

3. Our principles of conduct

The following guiding principles as fundamental principles of conduct define for us the framework conditions according to which we orientate our daily conduct.

- We comply with **laws** as well as internal and external guidelines.
- Our behaviour is characterised by **respect and appreciation**.
- We are committed to **fair and safe working conditions**.
- We respect **human rights** and **condemn discrimination**.
- We do not accept **corruption and bribery of any kind**.
- We **avoid conflicts of interest**.
- We **protect** our **property**.
- We treat **data and information confidentially**.
- We are committed to **fair and open competition**.
- We **carefully** select our **business partners**.
- We take **responsibility and protect our environment**.
- We **communicate conscientiously and truthfully**.

4. We comply with the law as well as internal and external guidelines.

A central point of our integrity is compliance with applicable laws.

All applicable national, European and international laws, official requirements and other internal company regulations must be observed in all business actions and decisions. SAG does not tolerate any violations of the law!

Each employee is obliged to inform himself/herself about the legal regulations applicable in his/her own area of responsibility and to comply with them. Since the laws and regulations of the countries in which SAG operates may differ, country-specific supplements may also be necessary. If national laws have stricter regulations than those regulated internally by us, the stricter rules always take precedence.

It is a matter of course for us that we comply with applicable laws and internal guidelines!

5. Our behaviour is characterised by respect and appreciation

Die Cooperation and behaviour with each other should be characterised by respect, appreciation, teamwork, fairness and trust.

Mutual recognition, respectful treatment and correct actions are a matter of course for us. This strengthens loyalty and identification with our company. Personal insults or disrespectful behaviour will not be tolerated.

We respect the privacy of our employees and do our best to help them balance their professional and private lives. We promote an environment that is characterised by tolerance towards diversity.

But we also act at eye level with our business partners and treat them with the appropriate respect, objectivity and courtesy.

We promote a working environment that is characterized by appreciation and teamwork. We also treat our business partners with respect and courtesy!

6. We are committed to fair and safe working conditions

The health and safety of our employees is our highest priority. Every individual should find a healthy and safe working environment.

Therefore, occupational safety and health protection is part of all operational processes. In doing so, we actively promote the assumption of responsibility and take measures to increase health and safety awareness that go beyond the legal requirements.

We implement a number of measures that contribute to health promotion and accident prevention. These include, for example, safety briefings, improvement suggestion schemes and health promotion programmes. We also see ourselves as an important and fair employer. The right to adequate remuneration is recognised for all employees.

A safe and healthy working environment is to be guaranteed for all! Dangerous or unhealthy behavior will not be tolerated!

7. We respect human rights and condemn discrimination.

Based on the UN Charter and the European Convention on Human Rights, **human rights are considered fundamental values that we always respect and observe.** We are committed to complying with the ILO core labour standards of the International Labour Organization and strictly reject any form of forced labour and child labour.

It is of great concern to us that everyone can work in a discrimination-free and safe environment. Within SAG, no one should be treated differently because of their gender, age, ethnicity, skin colour, religion or creed, social status, origin, marital status, physical or mental disability or sexual orientation. This also applies in particular to the recruitment of new employees, the granting of benefits, promotions or the approval of further training.

Bullying and sexual harassment also have no place with us and are not tolerated by appreciation and teamwork.

We respect human rights! We reject any kind of discrimination and bullying and do not accept any kind of sexual harassment in the workplace!

8. We do not accept corruption and bribery

We attach great importance to our independence and uninfluenceability. For this reason, we avoid circumstances that could influence our impartiality or even create the appearance of it. Corrupt behaviour can not only have serious consequences for our company and each individual, but ultimately damages society as a whole.

We neither offer nor accept benefits if this is intended to influence business transactions in an improper manner or could even create such an impression.

Occasional gifts in accordance with general practice, customary hospitality or other gifts of low value, where an influence on the business decision is excluded from the outset, are permissible. All other gifts must be refused or returned. Offering, granting, demanding or accepting cash or benefits of monetary value is always inadmissible.

We do not tolerate any activities that violate money laundering regulations. We report suspicious payments or transactions that indicate money laundering immediately.

We expressly reject any form of corrupt behavior. We do not take or give benefits that call our integrity into question!

9. We avoid conflicts of interest

Our actions are always guided by the interests of the company. In the course of our daily work, however, it is possible that we may find ourselves in situations where our personal interests conflict with the interests of SAG. We are committed to dealing transparently with such conflicts of interest. Only in this way can appropriate measures be taken to clarify and objectively assess them.

We fully disclose (potential) conflicts of interest to our superiors immediately and without being asked.

Conflicts of interest may arise in particular in connection with the exercise of secondary employment, participation in companies in the environment of SAG, cooperation with close relatives or the use of company property.

If our personal interests conflict with those of the company, we disclose the situation immediately!!!

10. We protect our property

We always treat the property of SAG, as well as the property of third parties, with the utmost care and respect. This also includes intellectual property such as inventions, research results, product developments, but also the know-how of our employees and patents. Each employee must handle this property with the utmost care and responsibility.

Business and trade secrets of any kind obtained in the course of professional activity may neither be used for the pursuit of one's own interests nor made accessible to unauthorised third parties.

Ensure that company information of any kind is always kept secure. If we need to disclose confidential information to third parties, we will have a confidentiality agreement signed.

We handle third-party property conscientiously and respect third-party property rights. We neither use, process nor circulate plagiarised products.

When using company property, we treat it with care and help protect it from misuse!

11. We treat data and information confidentially

We treat confidential information and personal data with the utmost care and protect it from unauthorized access and disclosure. In this context, we take special care not to discuss confidential information in public and not to disclose information or data to unauthorised third parties. We protect our data from loss, destruction, manipulation or unauthorised access or disclosure.

We process personal data in compliance with the legal framework only for legitimate purposes and only to the extent that it is needed to fulfil the purpose. We take all necessary measures to protect electronic and nonelectronic data from internal and external misuse. We take appropriate technical and organisational data security measures and update them regularly.

Each employee is contractually bound to secrecy. This strict obligation to maintain confidentiality remains in force even after leaving the company.

We protect confidential information and data from unauthorized viewing and disclosure!

12. We believe in fair and open competition

We are committed to fair and open competition and see it as an essential component of a successful market economy.

Therefore, we do not engage in any activities that could restrict fair competition or constitute violations of competition or antitrust laws. Anti-competitive behaviour such as agreements on prices, production services, sales territories or in the context of tenders is strictly rejected. We behave fairly towards our business partners and do not unduly restrict their market presence.

We never provide deliberately misleading or false information about our products or services. Our purchasing decisions are based exclusively on objective criteria. When we operate in markets where we hold a dominant position, we do not abuse that position.

We protect the free market and respect fair competition!
We do not form cartels and do not exchange sensitive information that could distort the market.

13. We choose our business partners carefully

Not only our own actions, but also those of our business partners influence how we are perceived by the public. That is why we take great care in selecting our business partners and scrupulously check their trustworthiness.

When initiating business relationships, we obtain sufficient information to be able to assess the reliability and integrity of our counterpart. This is done by checking public sources, official registers or sanctions lists. But we also obtain an adequate picture by obtaining references from third parties or by means of self-declarations.

When exporting, we comply with the applicable provisions on foreign trade law and observe the export control requirements as well as the applicable economic sanctions.

In the cooperation itself, transparency and fairness are important to us. That is why we always pay attention to a transparent business basis and appropriate remuneration. We do not pay inappropriate commissions or non-transparent fees.

We select our business partners with great care. We obtain sufficient information to verify their integrity.

14. We take responsibility and protect our environment

The preservation of an intact environment in which we all live is an important component of our corporate actions as well as our mission statement.

We are committed to a responsible and careful approach to the environment and natural resources.

SAG protects the environment through environmentally sound processes, modern operating facilities, responsible logistics, recycling and mindful product circulation.

We make another direct contribution through energy and metal recovery from secondary raw materials. To save fuel and energy consumption, our products are manufactured in special processes, at the end of which we receive secondary products of high quality. Of course, we undergo an ongoing internal and external testing and optimisation process to ensure that we continue to use production processes that are as environmentally friendly as possible.

Our environment is close to our hearts. That is why we always strive for sustainable and resource-saving solutions!

15. We communicate conscientiously and truthfully

We attach great importance to transparent and truthful reporting and disclose relevant information properly and in a timely manner.

We act conscientiously in communicating internally and externally about our business operations. We all take care to prepare reports, records and other documents correctly and completely. In particular, records of financial information must not be manipulated or have misleading entries.

We act and communicate conscientiously in social networks. We take particular care not to disclose any internal company information and not to make any statements that could damage SAG's reputation.

Official statements and reports to the media and the public are published exclusively by the persons responsible for them.

When preparing records and reports, we make sure that the information is presented correctly and truthfully!

16. Consequences in the event of infringements

Non-compliance with legal or internal company regulations can not only cause considerable damage to our entire group of companies, but can also have serious consequences for each individual.

Therefore, we do not hesitate to take action in the event of such violations and to take appropriate measures to clarify the facts. In the event of a violation, disciplinary action may be taken in accordance with national applicable laws, company agreements and employment contracts. Serious violations may result in consequences under labour law. In addition, SAG reserves the right to claim damages and civil action.

If we become aware of violations of our values and principles of conduct by business partners, we reserve the right to terminate the business relationship immediately and, if necessary, to take legal action for any damages incurred.

17. Reporting options & contact

In the course of our everyday business, we can always find ourselves in situations where we do not know how best to act.

The first points of contact for questions or in cases of doubt are

- Direct superiors
- Compliance department
- Human Resource department
- der work council

Contact Compliance: compliance@sag.at

In the event of suspicion or knowledge of violations of legal or internal regulations, each individual is required to report this to the named contact persons.

In addition, our Integrity Line provides an additional channel for internal and external stakeholders to report perceived violations and misconduct confidentially or anonymously. The Integrity Line can be accessed via our corporate website.

We assure special protection and support to all persons who make a report in good faith. This also applies if a report proves to be incorrect in content but was made in good faith.