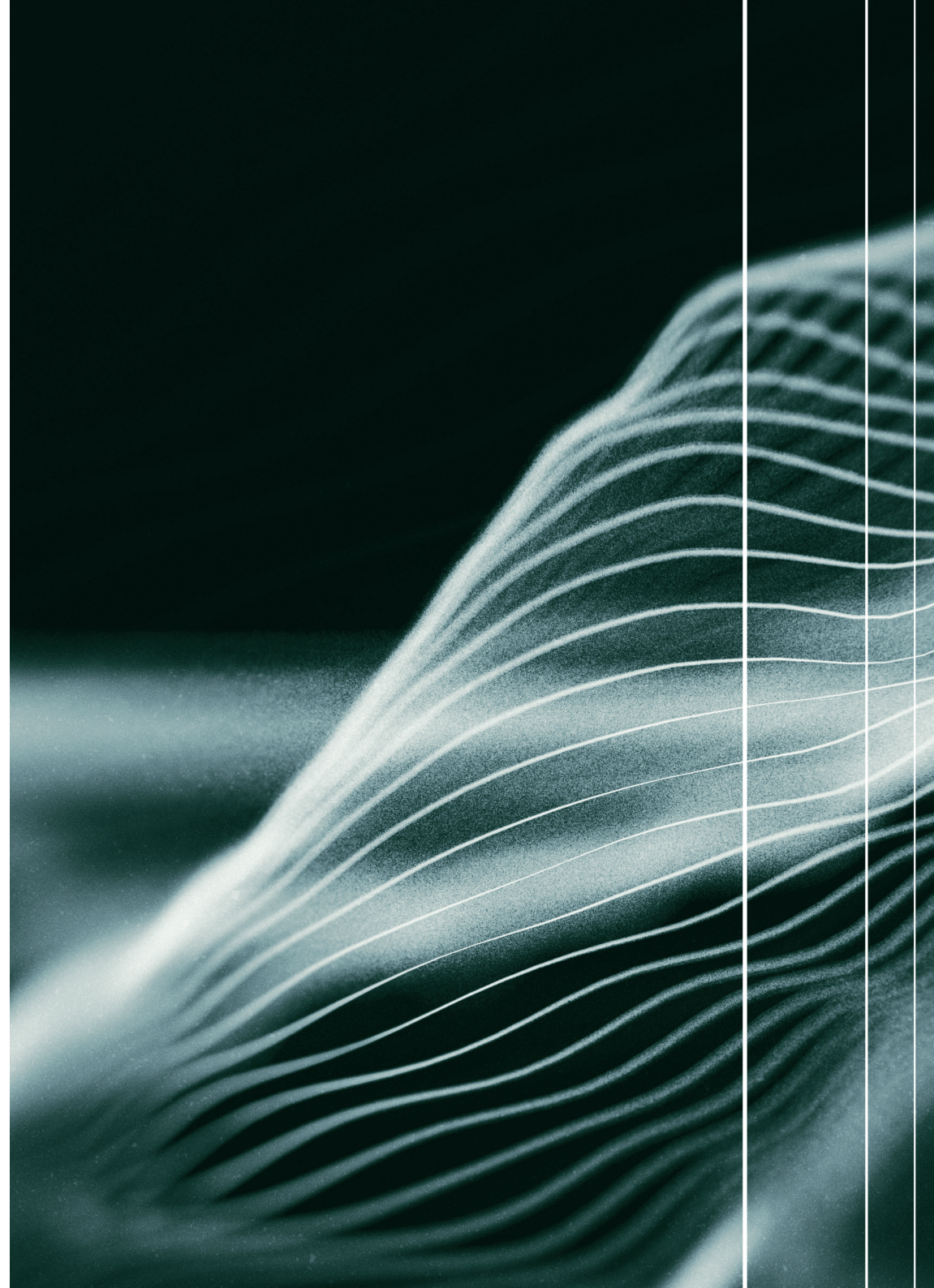


Global Human Rights Policy

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Speira – February 2024

Human Rights in Speira¹

Introduction

Speira respects the human rights of all individuals and groups that may be affected by our operations worldwide. This includes employees, contractors, suppliers, agencies, partners, communities, and those affected by the use and disposal of our products. Our commitment to respect human rights is guided by internationally recognized human

rights and labor standards, including those contained in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work (Core Labor Standards). To strengthen human rights, we are a member of the UN Global Compact (UNGC) and the Aluminium Stewardship Initiative (ASI). We comply with applicable

laws where we operate. If local laws conflict with the principles or standards included or otherwise referenced in this document, we seek to apply the highest possible principles or standards within the legal framework of the country concerned.

¹ "Speira" shall be understood as Speira BidCo II AS and its wholly owned subsidiaries as well as Speira Midco GmbH and its wholly owned subsidiaries.

Our Policy

Child Labor

The use of child labor is prohibited. The minimum employment age is set in accordance with the standards and requirements of the International Labor Organization for the prohibition of hazardous child labor. Their dignity must be respected, and their health and safety must be protected.

No Forced Labor

Speira opposes human trafficking and forced or compulsory labor, including all forms of modern slavery. All employment practices at Speira must adhere to the ILO's Core Labor Standards.

Our employment relationships are always based on voluntary participation. Any employment may be terminated with reasonable notice.

Wages and Benefits

The compensation and benefits paid or received for a standard work week must correspond at least to the legally valid and guaranteed national minimum. If legal or collective bargaining regulations do not exist, branch-specific tariff compensation and benefits should be used as a guide. We ensure an appropriate standard of living for employees and their families in their respective locations.

Working Hours

We adhere to the principle that working hours comply with local laws and industry standards. We prioritize safe and healthy working conditions, work breaks, appropriate limitations on working hours, and regular paid vacation, in accordance with applicable local laws. We also ensure compliance with all relevant regulations.

Freedom of Association and Right to Collective Bargaining

Speira recognizes the right of employees to form trade unions and participate in collective bargaining to negotiate working conditions and salaries, with no threat of retaliatory action. Provided this right is exercised in accordance with national laws, we respect the right to strike. All employees are entitled to join or form associations of their choice and to stand for election to the works council. We are committed to engaging in constructive dialogue in good faith with our employees' freely elected representatives where they are represented by a legally recognized trade union.

Non-discrimination, Diversity, Equality and Inclusive Culture

Speira is committed to equal opportunities in the labor market and complies with all relevant laws prohibiting discrimination, particularly based on gender, race, colour, reli-



gion, political views, union affiliation, ethnic background, disability, sexual orientation, language, veteran, or marital status. We ensure a diverse and inclusive work culture including a workforce with a rich variety of, for example, backgrounds, skills, races, nationalities, genders, and culture. Speira's policy is to provide equal employment opportunities to all employees without discrimination in recruitment, hiring, upgrading and promotion, terms, conditions and privileges of employment, company-sponsored training, access to facilities, educational assistance, social and recreational programs, compensation, benefits, transfers, discipline, layoff, recall or termination of employment.

Speira opposes all forms of discrimination treatment, including physical and mental cruelty, sexual harassment or discrimination gestures, language or physical contact that is sexual, coercive, threatening, abusive or exploitative. We expect our employees to treat each other with respect and dignity.

Any violation can be reported via the Speira [Speak Up](#) whistle blowing hotline.

Rights of Local Communities, Minorities and Indigenous Peoples

We respect the rights of local communities and indigenous peoples who may be affected by our business operations and consider the local impact of our activities. For work that may have a significant impact on land areas inhabited or used by indigenous peoples or other traditional groups, we consult and cooperate with the peoples concerned in line with ILO convention 169. To protect the rights of the above groups, we consider risk scenarios such as air, water, or soil pollution, deforestation, mismanage-

ment of hazardous waste, or groundwater extraction in water-scarce areas when determining our precise areas of action. To avoid negative impacts on local communities, we strive to use environmentally friendly and resource-efficient processes and methods in our facilities. Speira expressly opposes the destruction of cultural and ritual sites as well as the unlawful eviction and deprivation of land, forests, and waters.

Security Forces

Unlawful behavior by security personnel towards employees or third parties will not be tolerated. Security contractors are contractually required to respect all internationally recognized human rights and environmental rights and to ensure that security personnel are properly instructed and trained, as necessary, through appropriate policies and procedures and measures.

Health & Safety

Protecting and promoting the health of our employees is our top priority. For instance, we strictly comply with all applicable occupational health and safety legislation worldwide. We apply ISO certification standards, such as ISO 45001, to improve occupational health and safety conditions for employees. We also strive to ensure the well-being of employees in the supply chain and prevent harm resulting from their work. By establishing a culture of prevention, these causes can be eliminated, and occupational accidents, injuries, and illnesses can be avoided. High standards of technical and operational safety are the basis of our work. The aim here is to prevent industrial accidents and occupational diseases.

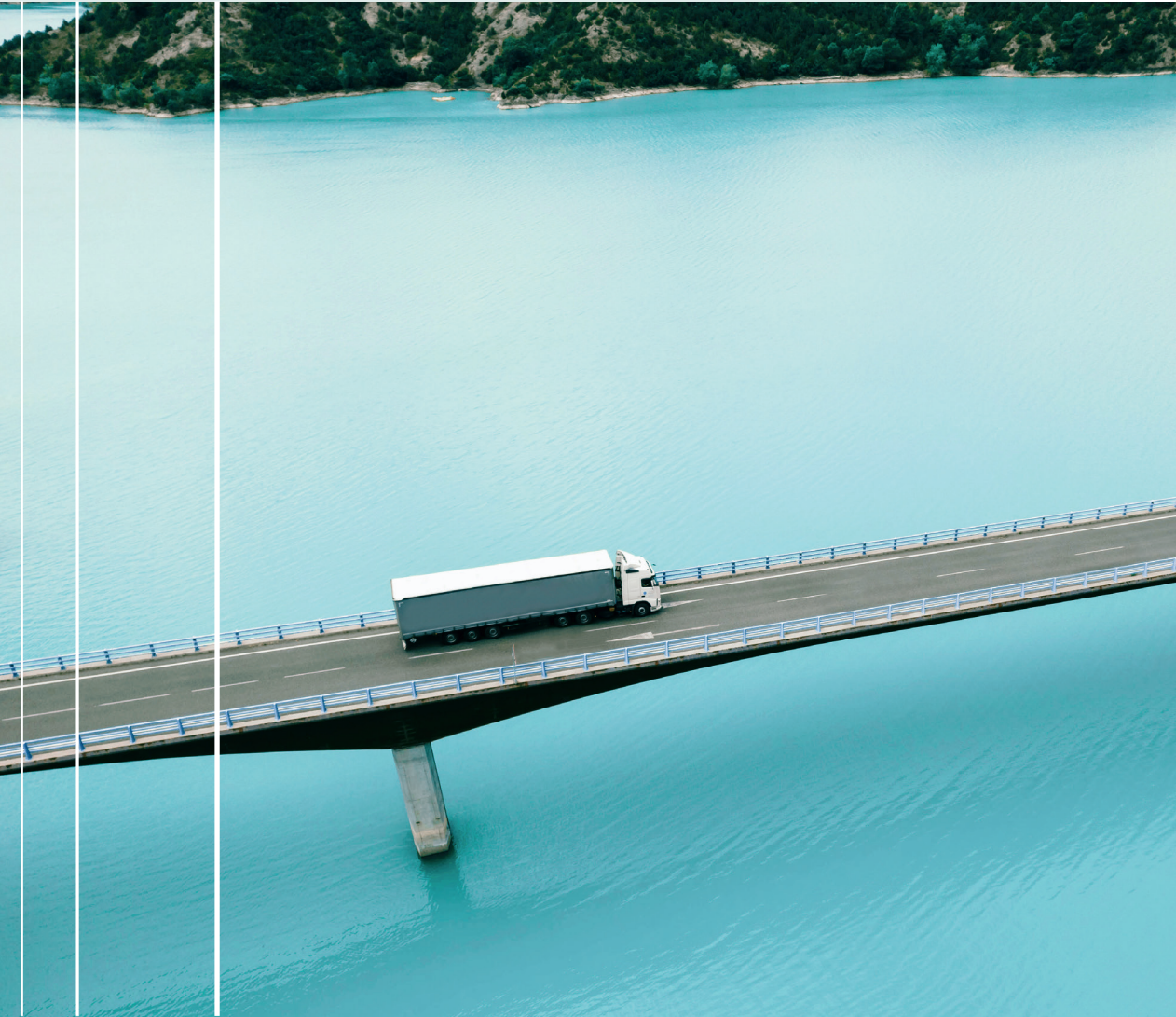
High-risk and Conflict Minerals

In dealing with raw materials, we take a risk-based approach with the aim of avoiding negative impacts on human rights and environmental standards. When analyzing our risks, we consider that fact that some of the raw materials for the manufacture of our products may be hazardous to people and the environment when sourced and processed and require specific actions.

We have procedures in place to avoid knowingly acquiring conflict minerals, which prevents the potential financing of conflicts and / or commission of, or toleration of, profiting from, or contributing to, serious human rights abuses and violations in the extraction, transportation, and trade of minerals, such as widespread sexual violence, war crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

Respecting Personal Rights and Protecting Personal Data

It is very important to us to respect and protect the individual rights, privacy and family life of employees, customers and other business partners, as well as their ability to determine how their personal data is managed. Personal information will be used and processed only to the extent permitted by law, regulation, our internal policies and with the consent of the individuals concerned. We are therefore committed to protecting the named rights, including the right to access, correct, block, or delete personal data.



Engaging with Suppliers and Other Business Partners

We consider the commitment of our suppliers and other business partners to fulfill their social responsibilities as an important condition for all forms of cooperation.

Our supplier code of conduct sets out the framework for our relationships with our suppliers, our core principles, the standards we adhere to and our sustainability requirements. This is an integral part of the tender documents and conditions for existing and new suppliers and business partners. The Speira Supplier Code of Conduct and General Terms of Purchase requires suppliers to protect human rights and relevant environmental standards. They are also expected to demand the same from their own subcontractors within reasonable limits.

Human Rights and Environment

We aim to achieve an exemplary environmental and energy balance worldwide, and our corporate HSE policy commits us to acting in an environmentally sound manner in all our activities, using resources sparingly and extracting raw materials efficiently to avoid or reduce the negative impact on the environment. We strive to reduce our environmental impact in terms of emissions and resource consumption through continuous technological development of our products and processes.

Management of Human Rights within Speira

- We carry out risk-based due diligence throughout our operations and supply chain to assess, prevent and address actual or potential adverse impacts on human rights that we may cause, contribute, or be linked to.
- Respecting human rights is part of Speira's Code of Conduct, with which all our employees shall comply.
- We have set minimum requirements relating to human rights to our suppliers. These are stated in Speira's Supplier Code of Conduct, as well as the General Terms and Conditions. We expect our suppliers to comply with and promote the same principles in their own supply chain.
- We consult parties we may impact through cause, contribution or linkage in the identification, assessment and management of significant human rights impacts associated with our activities.
- The companywide whistleblowing line Speira [Speak Up](#) for reporting concerns involving illegal, unethical, or unwanted behavior is available, on an identified or anonymous basis, to all stakeholders as a channel to contact us.
- We engage and collaborate with stakeholders both internally and externally where relevant to help inform us about, and evaluate the effectiveness of, our human rights management. This may include civic organizations, NGOs, unions, local associations, authorities, etc.
- To ensure compliance with human rights, suppliers are regularly audited via surveys or by internal or external auditors.
- Awareness-raising: We also ensure that our employees have the knowledge, awareness, and capacity they need to implement this policy.



- We aim to contribute to the economic and social development of our employees, our partners, and the communities in which we operate, and promote principles of good governance in doing so.
- We inform the public about our voluntary commitments in the area of human rights and about our established due diligence processes and their effectiveness in our annual sustainability report.

Speira's Sustainability department has a governance and advisory responsibility to ensure that necessary governing documents, processes and procedures are in place. Implementation of governing documents, processes and procedures developed by Corporate Sustainability that concern the respect for human rights is a line management responsibility. This document will be reviewed by Corporate Sustainability periodically. This will, if necessary, include addressing any significant changes in our human rights impact.



Einar Glomnes

Chief Executive Officer

Speira
Aluminiumstraße 1
41515 Grevenbroich
Deutschland