



HUMAN RIGHTS POLICY STATEMENT

TRUST. DRIVE. SHARE. - We make our values work, building our culture every day. We create trust through certified responsibility, proven quality and recognized service: honest, credible partners in every aspect.

Speira GmbH is committed to the respecting human rights in its own business operations and in its supply chain. To fulfill our corporate duty of care accordingly, we actively engage in respecting and upholding human rights. We ensure that our employees have the necessary knowledge and skills to implement this policy. Additionally, we contribute to the economic and social development of our employees, partners and communities while promoting the principles of good corporate governance. We publicly report on our voluntary commitments in human rights and the effectiveness of our due diligence processes on an annual basis.

To achieve these goals, we adhere to the following standards and frameworks:

- Universal Declaration of Human Rights
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises

To further strengthen our commitment to human rights, we are a member of the UN Global Compact (UNGC) and have published the [Communication on Progress Questionnaire](#). We also undergo regular audits by the [Aluminum Stewardship Initiative \(ASI\)](#).

We comply with all relevant national and international laws in the regions in which we operate.

To uphold our commitment to recognizing and respecting human rights at Speira, we have implemented guidelines that define our approach towards our employees, customers and suppliers. Respect for human rights is firmly embedded in our Code of Conduct and applies to all employees and suppliers.

The following guidelines are particularly relevant:

- [Our Code of Conduct:](#)
This serves as a guide for our employees, helping them understand and promote legal requirements and our corporate values. It includes guidelines on human rights, environmental protection, anti-corruption and other important topics that guide our day-to-day activities.
- [Speira Policy:](#)
We enforce strict rules and standards to prevent workplace accidents, property damage and protect the health of our employees. All employees are involved in occupational safety, health and environmental efforts to minimize risks. Environmental responsibility is an integral part of our daily business and our strategic corporate concepts. Through innovations and process optimizations as well as efficient use of resources, we actively contribute to climate protection.



- Supplier Code of Conduct:

We strive to realize our values and principles alongside our business partners. We therefore require our partners to act in accordance with the same or comparable standards and support us in our efforts. These standards and legal requirements are outlined in our Supplier Code of Conduct, which our partners must commit to comply with.

We expect our suppliers to comply with and promote these principles as well.

At Speira GmbH, we carry out an annual and ad hoc risk analysis to assess, prevent and address negative impacts on human rights.

We have completed an initial risk analysis for the supply chain. This was carried out in two stages. In the first step, abstract risks were assessed according to the criteria of country and sector risk, purchasing volume and potential extent. In a second step, high-risk suppliers were entered into the "Riskmethods" tool and are continuously monitored.

The specialist departments in Human Resources (HR) and Health, Safety & Environment (HSE) are responsible for risk analysis in their own business areas. Our current approach in the area of HR is based on internal company regulations, e.g. through company agreements, our Code of Conduct and instructions, as well as collective wage agreements and legal requirements, which are very comprehensive in Germany and to which we naturally adhere. In the area of occupational safety, annual audits are carried out and continuous inspections and risk analyses are performed to guarantee the safety of our employees. A structured risk analysis for our own business area in accordance with the German Supply Chain Duty of Care Act is currently in progress. Here, we will consider both potential and actual risks to prioritize them accordingly and to adapt our comprehensive and established measures to avoid and prevent incidents and check their effectiveness in an even more targeted manner.

As part of the UN Global Compact's Business and Human Rights Accelerator Program, a risk analysis was also carried out for our own business area and the supply chain. The prioritized risks based on these analyses include the following points that could potentially be relevant in the business division and along our value chain:

- Health and safety risks
- Working conditions
- Discrimination risks
- Environmental risks

Regardless of whether we identify risks in our own business area or at our suppliers, these are mitigated by appropriate measures and largely prevented by structured internal processes.

Suppliers are also checked by means of self-disclosures in the form of questionnaires and corresponding audits. In our own division, we have implemented health, safety and environmental measures in both HR and HSE in order to prevent risks. Compliance with internal guidelines is regularly reviewed by the relevant departments.



Our “[Speira Speak Up](#)” online tool is available to all stakeholders to report illegal or unethical behavior. This applies to our employees, our suppliers and their suppliers as well as the neighborhood surrounding our locations. Ethically and morally motivated reports are essential to uphold social and constitutional values and at the same time support the success of our company.

Complaints received are forwarded to the relevant specialist departments under the special protection of the whistleblower and processed promptly. We carefully follow up on every report to take appropriate remedial action and, if necessary, adjust our risk assessment and prioritization in order to prevent further incidents.

As part of the company board, our Human Rights Officer monitors risk management within the framework of the defined human rights strategy. Additionally, the Sustainability, Compliance and Procurement departments support our operational efforts to fulfill our corporate duty of care. We also work closely with internal and external stakeholders to assess and enhance the effectiveness of our human rights management.

This document is regularly reviewed and adapted as necessary.