



MODERN SLAVERY STATEMENT

Speira is a leading company in aluminum rolling and recycling with a strong European production base that includes locations in Germany and Norway. In addition to the production facilities, Speira has several sales offices, one of which is located in the UK.

Our culture is the fundament of how we work together and reach the targets we set and our culture roots in our values: TRUST. DRIVE. SHARE.

We make our values work, building our culture every day.

We are dedicated to upholding high standards of human rights and ethical business practices. Our joint venture Alunorf, the world's largest plant for aluminum casting and rolling, and our headquarters in Grevenbroich, the world's largest finishing plant for aluminum, support our commitment to ethical practices and compliance with modern slavery regulations.

Speira operates globally with diverse supply chains that span multiple countries. We understand the complexities and potential risks within our supply chain and are dedicated to making continuous improvements to ensure that our operations are free from any form of modern slavery or human trafficking. Our commitment extends to our direct suppliers, and we actively work to encourage their sub-suppliers to uphold ethical practices as well.

As part of our compliance with the Modern Slavery Act 2015, we present this statement to outline the steps we are taking to address modern slavery and human trafficking within our operations and supply chains.

This disclosure statement sets out our commitment towards identifying, understanding, and addressing the risks of modern slavery and human trafficking. In addition to complying with all applicable laws and regulations, it is important for us to continue to set the standard for ethical conduct in all our operations.

Speira is dedicated to upholding the highest standards of ethical conduct and human rights. We will continue to strengthen our efforts to prevent modern slavery and human rights trafficking in our business and supply chains.

The following disclosure statement is made on behalf of Speira UK Ltd. (sales office) pursuant to Section 51 (1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the year ending 31 December 2023.

David Winsper

David Winsper – Managing Director

Speira UK Ltd.

2024

Joep van der Pijl

Joep van der Pijl – Managing Director

Speira UK Ltd

2024



Policies and Governance

We have established policies and governance structures to address human rights and modern slavery risks.

Speira adheres to the following international frameworks and standards to ensure the respect and promotion of human rights:

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

We are a member of the United Nations Global Compact (UNGC) and have published the Communication on Progress Questionnaire to further strengthen our commitment to human rights. Moreover, the Aluminium Stewardship Initiative (ASI) regularly audits our operations.

Our Code of Conduct, Supplier Code of Conduct and Human Rights Policy reflect our commitment to ethical behavior and compliance with applicable laws and regulations. These policies are reviewed and updated on a regular basis. Our governance framework ensures that these policies are effectively communicated and enforced throughout our organization and supply chains.

A dedicated Human Rights Office, which oversees the implementation and monitoring of our human rights policies, is part of our management structure. This role is supported by our Sustainability, Compliance and Procurement departments, ensuring a comprehensive approach to managing human rights risks.

Risk Assessment, Due Diligence and Monitoring

Speira is committed to transparency and accountability in our efforts to fight modern slavery.

In line with our overall commitment to improving our ethical and environmental performance, this chart illustrates the steps described below to evaluate the effectiveness of our actions to address modern slavery.





We conduct regular and event-related risk assessments to identify and mitigate potential risks of modern slavery within our operations and supply chain.

As part of the UN Global Compact's Business and Human Rights Accelerator Program, we also conducted a risk analysis of our own operations and supply chain. We have identified the most significant risks to people and human rights that are most salient to our operations and that we are most likely to impact. Based on these analyses, the prioritized risks that may be relevant in our operations and along our value chain include:

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

We strive to undertake risk-based environmental and social impact assessments, wherever necessary, including an assessment of the risk of adverse human rights impacts, before initiating new projects or major expansion activities.

For our supply chain, we have implemented a two-stage risk analysis process. Initially, abstract risks are assessed based on country and industry risk, purchase volume, and potential impact. High-risk suppliers are then monitored continuously using the online tool 'Riskmethods' provided by Sphera, and we regularly monitor our supply chains. We aim to report on our progress in our upcoming annual sustainability report.

Specific measures are taken on the basis of the findings relating to the risks identified. This also applies to our supply chain. The effectiveness of the measures is reviewed at previously defined intervals.

To understand the impact of Speira's activities on the rights of affected individuals and groups, grievance or complaint mechanisms are important. Complaints can be of any nature. They can include social and environmental issues. We also encourage our employees, suppliers, and stakeholders to report any concerns or incidents of modern slavery through our confidential whistleblowing online tool '[Speira Speak Up](#)'. The online tool is available to all stakeholders, including employees, suppliers, and the local communities around our sites.

We value the input of individuals who have good faith concerns about Speira's respect for human rights. Speira is committed to not interfering with, taking retaliatory action against or obstructing access to any judicial or non-judicial complaint mechanism.

Training

To ensure that our suppliers and partners are committed to supporting our efforts against modern slavery, stakeholder engagement is critical. To achieve this, we raise awareness of the practical aspects of implementing effective ethical sourcing and responsible manufacturing standards by



providing training to key procurement and compliance personnel. Based on the risk analyses relevant employees receive training on the due diligence on a regular basis.

We have shared our Supplier Code of Conduct with our direct suppliers and provided clear, practical guidance to ensure they understand the importance of adhering to Speira's standards. The Supplier Code of Conduct is publicly available for download on the Speira website.

A key contribution to human rights is to ensure human working conditions within our organization and to promote the same standards in joint ventures and among our suppliers.