

Human Rights Policy

Policy Statement

At AluK, we hold human rights as a core value. We are committed to supporting, respecting, and protecting human rights in our relationships with our employees, suppliers, and business partners.

AluK undertakes to comply with the following international standards:

- The Charter of Fundamental Rights of the European Union
- The European Convention on Human Rights (ECHR)
- The United Nations Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights
- The International Labour Organization (ILO) Conventions

As well as the International Bill of Human Rights, which consists of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights and its two Optional Protocols.

Policy Intent

AluK's goal is to support, respect and protect human rights, both in our own business activities and in our business relationships with other parties. AluK expects the same of its suppliers. This policy reflects our commitment to human rights and ongoing efforts to protect human rights through our operations.

AluK plans to monitor compliance with this policy, both internally, through audits and with suppliers through the AluK's responsible sourcing policy.

Child Labour

AluK does not tolerate any form of child labour. AluK complies with all standards and laws concerning age, scope and areas of employment in particular the core labour standards of the International Labour Organization.

Forced Labor

AluK does not tolerate any form of compulsory or forced labour, from slavery, including modern slavery or human trafficking as well as serfdom and debt bondage.

The relevant core labour standards of the International Labour Organization are to be complied with and recruitment and employment practices are aligned with them, without exception.

Fair Compensation

AluK ensures fair wages in line with the statutory minimum wage relevant for the place of employment and is based on the principle of equal pay for work of equal value regardless of gender. Furthermore, AluK complies with applicable work hours, overtime and benefits laws. AluK is committed to preventing excessive working hours by ensuring all employees adhere to defined work schedules, take regular breaks, and avoid working beyond their contracted hours without prior approval.

Furthermore, AluK fully adheres to all applicable labor laws and regulations concerning paid holidays. We ensure that all employees receive holiday pay entitlements in accordance with relevant local, national, and international legislation. Any paid holidays provided will be in strict compliance with these legal requirements.

AluK's remuneration system generally combines competitive basic remuneration with additional benefits. AluK also offers its employees further measures to harmonize work and private life.

Freedom of Association and Collective Bargaining

AluK recognises the right of all employees to form employee representative bodies and to engage in collective negotiation regarding working conditions. All employees have the right to join or form associations of their choice or to stand as a candidate for such representative bodies. Employees shall not be discriminated against on the basis of their membership or non-affiliation in a worker's union. Where national law and this Group Human Rights policy differs, AluK will follow the higher standard; where they are in conflict, AluK will seek to respect internationally recognized human rights to the greatest extent possible.

Anti-Discrimination and Harassment

AluK is committed to a work environment free from discrimination, abuse, harassment, and to providing equal employment opportunities to all applicants and employees regardless of race, colour, religion, gender, age, national origin, ethnicity, marital status, sexual orientation, gender identity or expression, disability, or military status.

Discrimination on the basis of these characteristics is strictly prohibited. AluK complies with all legal requirements and the relevant International Labour Organization core labour standards.

Harassment is defined as any form of physical violence, including slaps, pushes or other forms of physical contact; any form of verbal violence including screaming, yelling or use of threatening, demeaning or insulting language; sexual harassment of any kind; as a mean to maintain labor discipline

AluK, its employees, and its suppliers strive to:

- Provide equal employment opportunities to all applicants and employees.
- Maintain workplaces free from harassment or discrimination toward employees, applicants for employment, customers, or any other individuals who visit or conduct business with AluK or its suppliers.

Diversity and equal opportunities

At AluK, diversity, equity, and inclusion are fundamental values. Our commitment to human rights is reinforced by our diversity, equity, and inclusion practices because a diverse, equitable and inclusive culture values human rights and empowers our employees to protect human rights and report concerns.

AluK is committed to equal opportunities within the group, treats all employees fairly and promotes individual development potential through trainings and further educational measures.

Safe and Healthy Workplace

At AluK, we hold the health and safety of our employees, suppliers, customers, and the general public as a core value. Our commitment to maintaining a healthy and safe workplace underscores our dedication to upholding human rights. To this end, AluK, along with its employees and suppliers, is committed to:

- Operating every aspect of our business in a way that prioritizes the safety and health of all individuals involved.
- Providing and utilizing the necessary resources to ensure our workplaces are safe and healthy.
- Identifying potential workplace hazards and taking reasonable measures to eliminate or mitigate them.

- Offering comprehensive safety information to train and protect our employees from workplace safety risks.
- Safe and healthy work environment, including but not limited to:
 - Access to water, sanitation, and hygiene (WASH)
 - Emergency preparation and response,
 - Hazardous materials handling procedures,
 - Management systems that address health and safety risks,
 - Appropriate building construction, electrical, and fire safety

By adhering to these principles, AluK reinforces its commitment to a safe, respectful, and healthy working environment for all.

Anti-bribery and Anti-corruption

AluK strictly adheres to all applicable anti-bribery and anti-corruption laws, ensuring that all business practices are conducted with the highest standards of integrity and transparency. We prohibit any form of bribery, corruption, or unethical conduct in our operations and interactions, whether with public officials or private entities. The Legal Department is responsible for overseeing compliance with these regulations, ensuring that our policies and procedures align with relevant legislation and are rigorously enforced across all levels of the company.

Implementation

At AluK, we are deeply committed to safeguarding human rights, maintaining high social standards, ensuring fair working conditions, and upholding environmental regulations. Despite our thorough efforts, we recognize that infringements can still occur. That is why we believe it is essential to proactively prevent any breaches of human rights, social standards, environmental regulations, and other legal or internal directives, and to investigate them thoroughly if they do arise.

To support this commitment, AluK has established a transparent complaints procedure that allows for the reporting of any infringements. This procedure is open to all AluK employees as well as anyone directly or indirectly impacted by our business activities, including customers, suppliers, service providers, and their respective employees. Should the need arise, these departments can directly contact:

- AluK's Human Resources (HR) Department
- AluK's Legal Department

AluK's HR and Legal Departments are dedicated to providing independent and impartial advice. We guarantee the confidentiality of all whistleblower channels to protect those who come forward.

By offering this secure and transparent process, AluK aims to ensure that issues are addressed promptly, fairly, and in a manner that upholds AluK's core values.

Regular reviews and updates of this policy will be periodically made to ensure that it remains effective and aligned with evolving standards.

Further commitments

AluK commits to adhere to all local and state laws covering human rights.

Furthermore, where national law and international human rights standards differ, the higher standard will be followed. In the event they are in conflict, AluK will seek to respect internationally recognized human rights to the greatest extent possible.

Applicability

AluK corporate policies are expressions of our values and intentions. AluK is also subject to extensive legal requirements in all territories where it operates, and all our actions in furtherance of this policy must be carried out in compliance with applicable law.

Signed by Board of Directors on 20/11/2024



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