

Complaint management and reports in accordance with the Whistleblower Protection Act

Objective of the Whistleblower Protection Act:

Whistleblowers make an important contribution to uncovering and punishing wrongdoing. The Whistleblower Protection Act (HinSchG) transposes the EU's Whistleblower Directive into national law in order to prevent whistleblowers from being professionally disadvantaged as a result of making a report.

This is intended to protect whistleblowers from discrimination and give them legal certainty. The identity of whistleblowers is also protected in the best possible way.

Who can contact our internal reporting office?

The HinSchG protects whistleblowers who report violations in connection with their professional activities. In addition to employees, this may also include third parties commissioned by the Alu-met Group, such as employees of suppliers, service providers, etc. Persons who support whistleblowers, such as work colleagues, family members or acquaintances, are also protected.

In addition to the HinSchG, complaints from outsiders, residents etc. are also dealt with in the manner described here.

A violation or complaint can be placed as follows:

If you have any indications of possible violations, e.g. in the areas of human rights, compliance or data protection, such as discrimination, bullying, health hazards, corruption, data protection violations, environmental pollution hazards, etc. or other complaints, please submit them to the Alu-met Group using one of the following channels.

- by telephone +43 5524 22224 210
- via the e-mail address <u>help@alu-met.com</u>
- via the complaint letterboxes at Alu-met GmbH and the AGN Nachrodt and Speedline Schlins plants
- Employees of the AGN Nachrodt plant can also contact the works council.

Top priority:

- All violations or complaints are treated with the utmost confidentiality within the Alu-met Group.
- The Alu-met Group does not tolerate any form of discrimination against persons who make such a report.

Procedure:

- 1. Receipt of the infringement/complaint.
- 2. The complaint is categorized thematically and forwarded confidentially to the responsible person or office in the Alu-met Group.
- 3. Confirmation of receipt of the infringement/complaint and notification of the expected processing period will be sent to the whistleblower within 72 hours.
- 4. Information is checked. If necessary, an on-site investigation is initiated.
- 5. Clarification of the facts in consultation with all parties involved within 7 days.
- 6. Development of a proposal for conflict resolution and remedy/reparation.



- 7. Implementation of the developed conflict solution to remedy/restore the situation.
- 8. After implementing the conflict resolution, consult with the persons concerned again to see whether everything has been clarified from their point of view and the procedure can be ended.
- 9. If no satisfactory solution to the conflict can be reached with the whistleblower, the whistleblower will be given the opportunity to speak directly with the Managing Director of Alu-met GmbH as the escalation point.
- 10. After confirmation of the conflict resolution by the whistleblower, the procedure is concluded and final feedback is provided within 90 days of submission of the report.