

TRIMET Code on Human Rights and Working Conditions (Human Rights Code)

TRIMET Aluminium SE

1. Introduction

1.1 Basics

TRIMET Aluminium SE (TRIMET) is committed to respecting internationally recognized human rights. TRIMET joined in 2015 the universally recognized Compliance Initiative of the German Association for Supply Chain Management, Procurement and Logistics (BME) and participates in an annual self-assessment procedure. TRIMET joined the Aluminium Stewardship Initiative in September 2019.

Avoiding violations of human rights corresponds to TRIMET's corporate image and is a declared aim.

TRIMET's responsibility in the field of human rights concentrates on issues and fields of action in which it can assert its influence as a medium-sized family business.

Insofar it complements the obligations of states and sovereign institutions to protect human rights.

Human rights are basic standards aimed at securing dignity and equality for all. They are universal, inalienable and indivisible entitlement of every human being in equal measure.

The following international standards are considered

- The ILO Declaration on Fundamental Principles and Rights at Work [LINK](#)
- The Ten Principles of the UN Global Compact [LINK](#)
- The UN Guiding Principles on Business and Human Rights [LINK](#)

The International Labor Organization (ILO) is a specialized agency of the United Nations head-quartered in Geneva. It is responsible for setting and implementing of international labor and social standards.

The United Nations Global Compact, the world's largest and most important initiative for responsible corporate governance, has published 10 universal principles.

1.2 TRIMET Human Rights Code - Objectives

This Human Rights Code defines and explains how TRIMET promotes human rights and how it implements the ILO Core Labor Standards in its business activities. It is valid at all TRIMET locations and for all TRIMET business areas and focuses on topics that

are of particular relevance to the company and its employees.

The TRIMET Code on Human Rights and Working Conditions applies in particular to

- employees (chapter 2)
- suppliers (chapter 3).

The present Human Rights Code reaffirms and clarifies the commitment to the respect for human rights. It supplements all existing company principles, guidelines and instructions.

2. Promoting human rights and favorable working conditions at TRIMET

2.1 Right to health and occupational safety

Protection and promotion of health of the employees are the top priority for TRIMET.

The company complies with all applicable health and safety laws. As a supplement to existing activities in the field of occupational safety, TRIMET has been participating since 2018 in the prevention strategy „Vision Zero. Zero accidents – stay healthy at work!“ of the German Social Accident Insurance Institution for the raw materials and chemical industry (BG RCI).

The responsible executives perform their duties in accordance with the applicable occupational health and safety requirements of TRIMET. They ensure that the employees concerned are regularly instructed in the relevant aspects of health and safety at work. To this end, executives are regularly trained. In addition, TRIMET actively promotes the physical and mental health of its employees in the area of health management.

2.2 Remuneration

TRIMET offers its employees competitive and attractive remuneration, which is supplemented by additional benefits.

2.3. Working times

TRIMET complies at least with the applicable national working time regulations. The working time and break arrangements take both operational and individual concerns into account.

2.4. Qualification

TRIMET promotes the long-term employability of its employees. It recruits new employees on the basis of their individual abilities and promotes or develops them accordingly. The company develops the skills and talents of its employees in order to ensure high performance and employability in the long term.

2.5. Right to privacy – protection of personal data

Innovative information technologies and the advancing media interconnection can present great challenges in the handling of personal data in everyday business life. The Data Protection Coordinator collaborates with the Data Protection Officer in order to ensure that the use of such data complies with the law.

2.6. Protection from discrimination and harassment

Equal treatment of all employees is a fundamental principle of TRIMET's corporate policy.

TRIMET does not tolerate discrimination or harassment of its employees. No one shall be disadvantaged, favored or harassed on the basis of any characteristic such as sex, race, color, religion, nationality, political or other opinion, ethnic origin, disability, age, sexual orientation or any other characteristic.

2.7. Freedom of association and the right to collective bargaining

TRIMET recognizes the right of all employees to form employee representations and to conduct collective bargaining to regulate working conditions.

TRIMET's culture is characterized by a trusting and constructive cooperation with the respective employee representatives. Employees are neither favored nor disadvantaged because of their affiliation or non-affiliation to a trade union or employee representation.

2.8. No forced labor

TRIMET does not tolerate any form of forced or compulsory labor.

In accordance with the ILO Core Labor Standards, TRIMET rejects the use of forced or unlawful labor in its business activities.

2.9. No child labor

TRIMET does not tolerate any form of child labor. Children must not be prevented from their education by gainful employment and thus restricted in their development. Their dignity must be respected and their safety and health protected. In accordance with the ILO Core Labor Standards, TRIMET complies with the minimum age for employment and

strictly rejects child labor. This applies in particular to the worst forms of child labor, such as hazardous activities, which can harm health, safety and moral of children.

2.10. Rights of local communities close to TRIMET sites

TRIMET respects the human rights of local communities at its sites that may be affected by TRIMET's operations. TRIMET strives at its sites to use environmentally sound and resource-efficient processes and procedures and to minimize negative effects on the local population.

3. Promoting human rights and favorable working conditions among suppliers

TRIMET expects its suppliers to comply with human rights, in particular with the ILO Core Labor Standards, the Principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights. TRIMET actively works – within the scope of its influence as a medium-sized family business – towards compliance with and implementation of these principles along the value chain. TRIMET classifies its influence on the supply chain as low and sees above all states and sovereign institutions as having a duty to protect human rights.

In order to promote compliance with social standards and respect for human rights in its supplier network, TRIMET is involved in the Aluminium Stewardship Initiative (ASI) and has set up a multi-level risk management process.

4. Implementation of the TRIMET Code on Human Rights and Working Conditions

In implementing the TRIMET Human Rights Code, TRIMET is guided by the requirements of the UN Guiding Principles on Business and Human Rights. Based on a systematic internal risk analysis, the management process in the company and in relation to our business partners is constantly being further developed. Human rights are an integral part of TRIMET's corporate culture.

The TRIMET Human Rights Code is communicated to all employees. In addition, the employees are trained on the associated points of view if required. Employees can report training needs to their supervisors, the Human Resources Department, employee representatives or the TRIMET Compliance Contact Point.

4.1. Accountability

Executives are responsible for the implementation of the TRIMET Human Rights Code in their area. Every employee is obliged to comply with the present

TRIMET Human Rights Code and to align his or her professional actions with the principles formulated therein.

If there are indications of possible violations of human rights, the employee may contact his or her own manager or the contact point listed below. All questions and concerns will be treated confidentially.

4.2. Regular reporting and information exchange

The TRIMET Sustainability Committee assesses the status of implementation of the Human Rights Code. The TRIMET Sustainability Committee consists of the members of the Executive Board and the Chief Compliance Officer. In addition, there is a regular exchange of information with the SE Works Council, which also includes a report on received information and its processing. From 2020, TRIMET will publish current information on the anchoring of human rights in the company and among business partners in its sustainability reporting.

4.3. Review and dialogue

This Human Rights Code is the starting point for further dialogue with various stakeholders.

TRIMET will regularly review its position on human rights and its implementation to ensure that it remains effective and up-to-date and amend it if necessary.

4.4. Contact

TRIMET has set up a point of contact for dealing with questions and concerns relating to human rights.

The TRIMET Compliance Contact answers questions about the TRIMET Code on Human Rights and Working Conditions and advises on assessing possible breaches and what to do next.

TRIMET Compliance Contact
Email: compliance@trimet.de

An appointment for a telephone call or a personal conversation can also be made via email. Enquiries will be treated anonymously on request.

4.5. Dealing with questions and concerns

A Human Rights Response Team consisting of a member of the HR department, a member of the SE Works Council and the Chief Compliance Officer, handles incoming questions and concerns. The team verifies reports and takes the necessary action.

Final provisions

The TRIMET Code on Human Rights and Working Conditions becomes effective on the day of signing. No individual claims or claims of third parties can be derived therefrom. Only the German version of this Code is binding.

Essen, October 10, 2019



Philipp Schlüter
Chief Executive Officer (CEO)



Dr. Andreas Lützerath
Board Member



Thomas Reuther
Board Member



Holger Stemmler
Board Member



Thomas Flesch
Chairman of the SE Works Council