

Modern Slavery Statement

1) Introduction

This Statement is made by TRIMET Aluminium SE for TRIMET group (including TRIMET France) - hereinafter referred to as "TRIMET" - and covers the calendar year ending 31 December 2023. It sets out the steps TRIMET is taking to reduce the risk of slavery and trafficking taking place in its businesses and supply chain.

2) TRIMET group – at a glance

TRIMET is a non-integrated aluminium producer based in Germany and France. "Non-integrated" means that TRIMET does not own neither alumina refineries nor bauxites mines which are relevant for the production of primary aluminium.

Around 2,400 employees in Germany and France work together with our customers to make cars more economical, airplanes lighter, wind turbines and power plants more efficient, buildings more modern and packaging more ecological.

3) General Statement

TRIMET places great importance on respecting and promoting human rights. That includes having a zero-tolerance policy approach to all forms of slavery and human trafficking.

TRIMET is committed to respecting internationally recognized human rights. TRIMET joined the compliance initiative of the German Association of Materials Management, Purchasing and Logistics (BME) in 2015 and takes part in an annual self-assessment process. TRIMET has been a member of the Aluminum Stewardship Initiative since 2019. It is in line with TRIMET's philosophy and is a declared goal to avoid violations of human rights. TRIMET's responsibility in the area of human rights focuses on topics and fields of action in which it can exert its influence as a medium-sized family business. In this respect, it complements the obligations of states and sovereign institutions to protect human rights.

4) Policies on Modern Slavery and Human Trafficking

TRIMET's commitment is reflected in particular in the Human Rights Policy and the Supplier Code of Conduct.

- Human Rights Policy: TRIMET Aluminium SE maintains a comprehensive Human Rights Policy that explicitly condemns all forms of modern slavery and human trafficking. This policy applies to all our employees, contractors, suppliers, and business partners, and it outlines our commitment to respecting and protecting human rights throughout our operations.
- Supplier Code of Conduct: We have implemented a Supplier Code of Conduct that requires all our suppliers to adhere to the same ethical standards that we maintain internally. This code includes provisions to prevent modern slavery and human trafficking, and we expect our suppliers to take appropriate measures to address these issues within their own supply chains.

5) Steps taken

Within TRIMET, the management approach to human rights focuses on identifying relevant risks. Risk analyses are performed to identify potentially adverse impacts on TRIMET's business activities on human rights. The main criteria of these analyses focus on the type of business activity and the country risk related specifically to human rights. Specific actions would be derived from the findings in respect of the identified risks. In 2023, TRIMET implemented an IT- tool (IntegrityNext) for the assessment of the abstract risks. The assessment is carried out on the basis of various subject areas (risks) in order to enable a detailed risk assessment. A large number of quantitative indicators from renowned institutions, such as the World Bank or the United Nations, form the basis for the assessment of country risk. An additional analysis of industrial risks complements the country risk analysis. Various qualitative sources and databases, such as the CSR Risk Check or studies by the Business & Human Rights Helpdesk, enable an assessment of industrial risks in various subject areas. The industrial risk analysis distinguishes 88 different industries according to the NACE codes. TRIMET combines the results from the country risk analysis with the results of the industrial risk analysis to produce an assessment. This combination enables an assessment of the potential risk per subject area and per direct supplier in the risk categories 'low risk', 'medium risk' and 'high risk'. It thus forms the basis for a comprehensive risk analysis. Abstract high risks for modern slavery were identified in some bauxite activities depending on the location on the bauxite mines. TRIMET is not directly sourcing neither alumina nor bauxite. Therefore, TRIMET is not in direct contact with bauxite suppliers. In addition, TRIMET monitors both direct and indirect suppliers in a critical news monitoring system provided by IntegrityNext,

The German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG) – hereinafter referred to as “Supply Chain Act” came into force on January 1, 2023, and is applicable for TRIMET (due to its size) as of January 1, 2024. According to the Supply Chain Act, companies based in Germany are now legally required to establish a comprehensive risk management system to identify, prevent or minimize the risk of human rights violations on modern forms of slavery. Moreover, the Supply Chain Act sets out the necessary preventive and remedial measures, makes complaint mechanisms mandatory and requires annual reports to the German Federal Office for Economic Affairs and Export Controls (BAFA). Starting 2023, the implementation of the Supply Chain Act was prepared by TRIMET. In particular, the focus was on preparing a comprehensive risks analysis to obtain even greater transparency regarding human rights and environmental risks both in the companies' own business area and in the global supply chain.

Procurement continues to focus on sustainable criteria. TRIMET's purchasing departments implement the Supplier Code of Conduct. As part of our due diligence process, we started to conduct audits of selected suppliers to ensure compliance with our Supplier Code of Conduct. We provide ongoing training to our employees, especially those involved in procurement and supply chain management, to increase awareness of modern slavery and human trafficking.

In 2023, we improved the existing supply chain due diligence of our direct goods and services providers by using the IT-tool IntegrityNext.

Following a risk-based approach, we assessed the indirect suppliers of metals and minerals using our internal risk criteria, including the risks defined in the OECD Due Diligence Guidance on Responsible Sourcing of Minerals from Conflict Affected and High-Risk Areas, 3rd edition (OECD DDG). Since our brands are registered with the LME, we implemented the LME responsible sourcing

requirements which request compliance with the OECD DDG. In 2023, we did not identify any indirect supplier operating in a CAHRA as defined by the OECD DDG Gold Supplement.

TRIMET has implemented a central whistle-blowing management tool – TRIMET Integra. In 2023, the whistle-blowing management tool underwent a review. It already meets the requirements of the Supply Chain Act – nevertheless, some modifications might follow. It is open for all tip-offs on human rights violations. Reports are treated with strict confidentiality or – on request – anonymously. In 2023, no human rights violation was reported.

6) Endorsement of this statement

The Board of TRIMET Aluminium SE recognizes the importance of the matters considered in this Statement. TRIMET will continue to take all measures necessary to ensure that slavery and human trafficking have no place in TRIMET's business operations.



Philipp Schlüter



Ralf Koslowski



Gregor Kottmann



Dr. Andreas Lützerath