

HUMAN RIGHTS POLICY

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Operating on a global scale brings with it responsibility to pay particular attention to the basic rules of human coexistence. That is why voestalpine is committed unconditionally to upholding human rights, based on the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the core labor standards of the International Labour Organization (ILO). Since 2013, voestalpine has also supported the UN Global Compact (UNGC), whose ten principles address basic obligations in the fields of human rights, labor standards, environmental protection, and the fight against corruption.

Respecting human rights is a fundamental principle guiding the actions of all voestalpine companies. The company's commitment to respecting and upholding human rights is enshrined in detail in the chapter of the voestalpine Code of Conduct entitled "Human Rights, Respect and Integrity." voestalpine requires not only its executives and employees, but also all of its business partners to uphold human rights. Respect for human rights is also a key element of voestalpine's binding Code of Conduct for Business Partners.

HUMAN RIGHTS TRAINING FOR EMPLOYEES

All employees of the voestalpine Group worldwide are required to complete an e-learning course on human rights. The e-learning course is rolled out in three modules:

- » Module 1: What are human rights?
- » Module 2: Human rights in everyday working life
- » Module 3: Human rights in the supply chain

The e-learning course is available in the following languages: German, English, Chinese, Czech, Dutch, French, Italian, Polish, Portuguese, Romanian, Russian, Swedish, Spanish, and Turkish.

HUMAN RIGHTS TRAINING FOR SECURITY PERSONNEL

voestalpine's plant security staff largely comprises the company's own employees, who are subject to the Group's Code of Conduct. Where third-party security personnel are engaged, they are subject to the Code of Conduct for Business Partners. Both documents mandate compliance with human rights. voestalpine provides training on this matter to its own employees itself; external security personnel are trained by their respective employers.

COLLECTIVE BARGAINING AND THE RIGHT TO FREEDOM OF ASSOCIATION

Every voestalpine employee has the freedom and right to join a union. Around 75% of all of voestalpine Group employees are in an employment relationship governed by a collective agreement or similar corporate agreement. The voestalpine Group also has a European Works Council and a Group Works Council, which maintain a good level of communication with management.

REMUNERATION AND WORKING HOURS

The regulations on working hours must comply with national legislation and prevent employees from suffering from excessive physical and mental fatigue. Employees should be entitled to at least one day off per week.

Employees must be remunerated in accordance with the applicable legal regulations and collective agreements, and this remuneration must be sufficient to meet the basic needs of employees and their families and to provide them with a decent standard of living.

CHILD LABOR

voestalpine strictly rejects any form of child labor. Furthermore, it must be ensured that the employment of young workers does not jeopardize their health, safety, or development.

FORCED AND COMPULSORY LABOR, HUMAN TRAFFICKING AND MODERN SLAVERY

voestalpine does not tolerate any form of forced or compulsory labor, human trafficking, or modern slavery. Forced and compulsory labor refers, in particular, to all work or services performed by persons coerced to do so under threat of punishment, and also includes the withholding of identity cards and passports, restrictions on movement, and debt bondage.

Both the voestalpine Code of Conduct and the Code of Conduct for Business Partners explicitly mention and expressly prohibit human trafficking and modern slavery.

RIGHTS OF INDIGENOUS PEOPLES

As voestalpine operates solely in developed industrial areas, its business operations do not in any way impinge on the rights of indigenous peoples. Suppliers are required to comply with the rights of indigenous peoples in managing their supply chains.

DIVERSITY, EQUAL OPPORTUNITIES, AND BAN ON DISCRIMINATION

voestalpine is committed to respecting all people with whom it has a relationship—employees, customers, business partners—irrespective of gender, skin color, nationality, ethnicity, religion or worldview, impairment, age, sexual orientation, or identity. This commitment and corresponding actions promotes a climate of acceptance, equal opportunities, and mutual trust. As laid out in the “Respect and Integrity” chapter of the voestalpine Code of Conduct, the Group does not tolerate any form of discrimination.

HUMAN RIGHTS IN THE SUPPLY CHAIN

As part of the company’s review of the supply chain (Sustainable Supply Chain Management, SSCM), suppliers are evaluated in a targeted fashion with respect to compliance with human rights and, specifically, the prohibition of child, forced, and compulsory labor.

In the event of violations, voestalpine takes appropriate measures that may ultimately lead to the suspension or termination of the supply relationship.

REPORTS OF VIOLATIONS

Reports of human rights violations can always be submitted in person to direct managers, the local HR departments, Group Human Resources at voestalpine AG, as well as to the Management Board. Violations can also be reported to a Human Rights Officer (see below) or via voestalpine’s online whistleblower system at <https://www.bkms-system.net/voestalpine>. The online whistleblower system allows reports to be submitted anonymously.

HUMAN RIGHTS OFFICER

voestalpine has established the position of Human Rights Officer. As well as the whistleblower system noted above, emails sent to humanrights@voestalpine.com or menschenrechte@voestalpine.com will be read by the Human Rights Officer who will promptly forward reports to the relevant authorities. Depending on the incident in question, this may be the local company management, local HR departments, or relevant procurement departments. Compliance with human rights is also part of the regular risk management process.

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voestalpine

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