

THÖNI GROUP

Supply Chain Strategy

Conflict-Affected and High-Risk Areas

thöni[®]



The management board: Thomas Bock, Helmut Thöni, Anton Mederle (left to right)

MESSAGE FROM THE MANAGEMENT

Dear Suppliers of the Thöni Group!

As a family business we take great pride in flexibility, reliability and continuity and we set high standards for the quality of our products and services. This understanding motivates our everyday action as well as our strategic decisions and requires highest levels of integrity and professionalism.

Therefore, clear values apply within the Thöni group to encourage respectful interactions with integrity towards members of staff, business partners and third parties as well as in terms of observing national and international regulations in commercial transactions.

Please take note of the contents of this supply chain strategy and apply it in your organisation. The management board of Thöni Group expects your support in order to successfully implement the specifications within commercial practice.

The Management of Thöni Holding GmbH

Telfs, October 2024



KR Ing. Helmut Thöni



Dipl. Ing. Anton Mederle



Dr. Thomas Bock

1. GENERAL INFORMATION




This strategy confirms the obligation of the Thöni company group, to respect human rights, to avoid all measures which may contribute to financing of conflicts and to fulfil all relevant UN sanctions, resolutions and laws.

We are also committed to exerting our influence, which is rather limited due to our position in the value-added chain, to prevent abuse by applying the 5-step framework of the OECD for risk-based compliance with due diligence within the supply chain for minerals from conflict-affected and high-risk areas.

If we become aware of any violations of our guidelines, we will investigate the incidences to understand the root causes and take appropriate measures. We will try and work with the suppliers to ensure that a sustainable plan for correction of the violations is implemented before deliveries are resumed. If the remedial and corrective measures are not adequately and verifiably implemented within an agreed period of time, Thöni can reconsider the business relationship with the supplier and if necessary, terminate it.

Interested parties will always have the opportunity to voice concerns and report violations via our whistleblower platform. Our whistleblower platform can be accessed via a link on our homepage on www.thoeni.com and is publicly available.

2. REGARDING SERIOUS ABUSES ASSOCIATED WITH THE EXTRACTION, TRANSPORT OR TRADE OF BAUXITE AND MINERALS



We will not, under any circumstances, tolerate, profit, contribute to, assist or facilitate the commission by any party of:

Torture, cruel, inhumane or degrading treatment;

Any type of forced labour, worst forms of child labour; gross human rights violations and abuses such as widespread sexual violence; war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined above.

3. REGARDING DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS



We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals, in particular procuring bauxite and minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who are mentioned in resolutions of the UN Security Council and who:

- illegally control mine sites or otherwise control transportation routes, points where bauxite and minerals are traded and upstream suppliers in the supply chain; or
- illegally tax or extort money or bauxite or minerals at points of access to mine sites, along transportation routes or at points where bauxite and minerals are traded, illegally tax or extort intermediaries, export companies or international traders.

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or otherwise linked to, any party providing direct or indirect support to non-state armed groups as defined above.


4. REGARDING PUBLIC OR PRIVATE SECURITY FORCES



We recognise that the role of public or private security forces at the mine sites and/or surrounding areas or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.


We agree to eliminate direct or indirect support to public or private security forces who commit the abuse as described in section 2 or act illegally as described in section 3.

5. REGARDING BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF MINERALS



We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of bauxite and minerals, or to misrepresent taxes, fees and royalties paid to governments for the purposes of bauxite and mineral extraction, trade, handling, transport and export.

6. REGARDING MONEY LAUNDERING AND THE PAYMENT OF TAXES, FEES AND ROYALTIES DUE TO GOVERNMENTS



We will support every effort, or take appropriate steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of bauxite and minerals derived from the illegal taxation or extortion.

We will ensure that all taxes, fees, and royalties related to bauxite and mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments.