SUPERIOR INDUSTRIES

Policy for Conflict-Affected and High-Risk Areas

Written by:	Sustainability Manager
Approved by:	Chief Human Resources Officer & General Counsel
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1. This policy confirms Superior Industries' commitment to respect Human Rights, avoid contributing to the finance of conflict, and comply with all relevant UN sanctions, resolutions and laws.

We also commit to use our influence to prevent abuses by others through risk-based supply chain Due Diligence, by implementing the OECD five-step framework for responsible supply chains of minerals from Conflict-Affected and High-Risk Areas:

- Step 1 - Establishing strong management systems through this policy, assigning clear responsibilities, and ensuring proper training for the procurement team. Collecting and analyzing supplier information utilizing diverse resources such as the Aluminium Stewardship Initiative (ASI) platform, the LME Exchange, and direct supplier engagement when needed.

- Step 2 - Identifying and assessing risks by looking for red flags, and should any red flags be identified, evaluating whether they are associated with adverse impacts.

- Step 3 - In the event that risks are identified, a robust strategy will be designed and implemented to mitigate, manage, or prevent them.

- Step 4 - As a post-casthouse entity, Superior relies on verified third-party assurances—such as ensuring that upstream suppliers and smelters hold valid ASI certifications or equivalent independent audits aligned with OECD guidance.

- Step 5 - Publicly reporting annually on supply chain due diligence performance and practices

Superior provides an independent reporting channel operated by a third-party provider. Employees, suppliers, and stakeholders can use this channel to raise concerns about supply-chain practices, including possible human rights violations, environmental risks, unethical behavior, or non-compliance within our supplier network. All reports are treated confidentially, handled with care, and followed by appropriate corrective actions. Superior prohibits retaliation against any individual who raises a concern in good faith or participates in an investigation. There are several ways to report non-compliance:

Complete the online form at EthicsPoint - Superior Industries
Call the Ethics Hotline at:
- United States: 1-855-208-3106
- Germany: 0-800-180-7071
- Mexico: 001-800-266-0293
- Poland: (0) 800-005-678

These resources are available at all times, free of charge, in local languages.

2. Regarding serious abuses associated with the extraction, transport or trade of bauxite:

a. We will neither tolerate, nor profit from, contribute to, assist or facilitate by any party the commission of:
i. Torture, cruel, inhuman and degrading treatment
ii. Forced or compulsory labour
iii. The worst forms of Child Labour
iv. Gross Human Rights violations and abuses such as widespread sexual violence

v. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

b. 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 in paragraph 2a.

3. Regarding direct or indirect support to non-state armed groups:

a. We will not tolerate direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals, including, but not limited to, procuring bauxite from, making payments to, or otherwise assisting or equipping non-state armed groups or their affiliates, as identified by UN Security Council resolutions, who:

I. Illegally control mine sites, transportation routes, points where bauxite are traded and upstream actors in the supply chain; or

ii. Illegally tax or extort money or bauxite at mine sites, along transportation routes or at points where bauxite is traded, or from intermediaries, export companies or international Traders.

b. 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 providing direct or indirect support to non-state armed groups as defined in paragraph 3a.

4. Regarding public or private security forces:

a. We recognise that the role of public or private security forces is to maintain the rule of law, safeguard Human Rights, provide security to workers, equipment and facilities, and protect mine sites or transportation routes from interference with legitimate extraction and trade.

b. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 2a, or that act illegally as described in paragraph 3a.

5. Regarding Bribery and fraudulent misrepresentation of the origin of minerals:

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

6. Regarding money laundering and payment of taxes, fees and royalties due to governments:

a. We will support and contribute to efforts to eliminate 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 derived from illegal taxation of Extortion.

b. We support the payment and disclosure of all taxes, fees and royalties due to governments related to bauxite extraction, trade and export from Conflict-Affected and High-Risk Areas.

DOCUMENT HISTORY

Version 1	November 2026	First release