

# Shining a light on Integrity

Code of Conduct



Aluminium  
for the world

[albasmelter.com](http://albasmelter.com)  
[www.alba.ethicspoint.com](http://www.alba.ethicspoint.com)

<b>Message from the Chief Executive</b>	4
<b>Introduction</b>	5
<b>1. Valuing All People</b>	8
1.1 Respect and Non-Harassment	8
1.2 Fair Treatment and Equal Opportunity	8
<b>2. Safety, Health and Environment</b>	10
2.1 Policy and Commitment	10
2.2 Substance Abuse	10
<b>3. Corporate Social Responsibility</b>	12
3.1 Respect for the Law	12
3.2 Community and Political Relations	13
<b>4. Ethical Business</b>	14
4.1 Conflicts of Interest	14
4.2 Bribery and Corruption	16
4.3 Gifts and Entertainment	17
4.4 Protecting our Assets against Fraud, Theft and Misuse	18
4.5 Accurate Reporting	19
<b>5. Information and Confidentiality</b>	20
5.1 Confidential Information	20
5.2 Representing Alba, and Contact with the Media	22
5.3 Use of Information Technology	22

# Message from the Chief Executive

## Dear Colleagues,

We are all proud of Alba's national and international reputation as one of the leading smelters in the world, manufacturing the highest quality products in a safe and responsible way. The methods we employ to attain these results are as important as the results themselves.

Great companies are built on trust. For Alba to continue on its successful journey, we need the trust and confidence of our employees, customers, partners, investors, and the communities and society in which we work and live. Trust is earned through the demonstration of consistently high standards of behaviour and care. It takes time and effort to build, but can be destroyed in an instant through carelessness or a lapse in integrity.

At Alba, we believe in upholding the highest standards of ethical and professional behaviour in everything we do. This Code of Conduct outlines

“We believe in upholding the highest standards of ethical and professional behaviour in everything we do”



the behaviour expected of each of us in relation to our employment. It enshrines our shared beliefs in the basic principles of honesty, fairness, integrity and respect for people. We must all promote trust, openness, teamwork, professionalism and pride in what we do. We will conduct our business in a safe, ethical, professional, environmentally sustainable and socially responsible manner.

To accomplish these objectives, we need the loyalty and support of all our employees. This code provides each of us with a set of basic guidelines designed to prevent actions that may reflect badly on the employee or on the organisation. Since it is impossible to describe every possible situation, employees must use their judgement so that their conduct conforms to the intent and the spirit of this code.

If you suspect that this Code has been violated, then report it. Alba will not tolerate retaliation against those who raise concerns in good faith.

As Alba employees, we are expected to review this code periodically and apply its principles to our daily work with complete understanding and compliance.

Tim Murray  
**Chief Executive Officer**



## Introduction

This Code of Conduct applies to employees and others working on behalf of Aluminium Bahrain B.S.C. (Alba). By working for Alba, you are agreeing to comply with this code.

Its purpose is to provide a set of expectations and guidelines to all those working for Alba, to ensure that we always uphold the highest standards of integrity and personal conduct in our business and professional activities, and when dealing with colleagues, vendors, customers, contractors, government agencies and the public.

Any breaches of this code are unacceptable and may result in disciplinary action up to and including dismissal, for those that violate the code, and for those who cover up or hide violations. In addition, those guilty of misconduct may be subject to legal action in the case of any breach of law.

This Code of Conduct is designed to supplement, not replace, the existing Alba personnel policy.

## This Code and our Business Partners

Employees must not use a contractor, agent or other third party to perform any act which conflicts with this code.

Employees who engage third parties to work on Alba's behalf should ensure that these parties are made aware of the code and should seek their co-operation in adhering to the code. You must report any breaches or inconsistent behaviour by third parties while they are working for Alba.

## The duties of employees who supervise others

Employees who have responsibilities to supervise others should:

- Promote and encourage compliance and ethics by their own example.
- Make sure that those who report to them understand this code.
- Enforce the code consistently by holding employees accountable for exhibiting the proper behaviours, and reporting any breaches of the code.
- Support employees who, in good faith, raise questions or concerns by (i) encouraging employees to report concerns, (ii) addressing concerns that are raised and (iii) ensuring that employees who raise concerns are not subject to retaliation.





## Share Your Concerns

It is very common for employees to have concerns about what is happening at work. Usually these concerns are easily explained and the issues resolved. However, it can be difficult to know what to do. You have a duty to report any breaches or potential breaches of this code when you become aware of them— whether these relate to your own department or others. If you are in any doubt about whether to speak up, ask yourself these simple questions:

- 1) Is it legal?
- 2) Does it comply with this code and other Alba policies?
- 3) What would my colleagues, manager or family think about this?
- 4) How would this look reported in the newspaper?
- 5) Does it feel right?

## Where do I go for help?

Your line supervisor or manager is usually a good place to start with a concern. You may also get help or advice from a member of Alba's Integrity Task Force, which consists of the, Chief Internal Auditor, the Chief Administration Officer and the Legal Manager. However, if you feel uncomfortable using one of these resources, you may also contact Integrity Line, as described below, at any time.

## Retaliation will not be tolerated

Every employee should feel secure in seeking advice and in raising concerns. Alba will not tolerate retaliation against those who raise concerns in good faith, even if the concern turns out to be unfounded. This assurance is not extended to someone who maliciously raises a matter he/she knows is untrue. Allegations of retaliation will be investigated, and employees or managers who harass, or retaliate against those that have raised concerns in good faith will be subject to disciplinary action. Retaliation can take many forms, including reducing pay, damaging career opportunities, issuing discipline, threatening or bullying, etc, in order to punish someone for reporting a concern or to deter him/her from reporting a concern.

“Every employee should feel secure in raising concerns without fear”



## Alba's Integrity Line

If you ever feel uncomfortable speaking to others directly, Alba has also implemented a reporting help line through which Alba employees, contractors and commercial partners can report in confidence any breaches of Alba's Code of Conduct, such as financial irregularities, frauds and other matters that could potentially prove damaging to the company. It is called Integrity Line, and is operated by an independent company that helps businesses respond to concerns about compliance and ethics.

Please note that this procedure should not be used to report safety, environmental or security accidents, incidents or emergencies – these should be reported immediately under other Alba procedures. Employee-related grievances are also more appropriately handled through the grievance procedure administered by HR.

The Integrity Line is designed to operate on a confidential basis. You should feel free to raise concerns in good faith without fear of losing your job or suffering any form of retribution as a result. You can even make your report anonymously. However, we would prefer that you provide your name and contact information, and we assure you that these details will be kept absolutely confidential. You can support your report with documentary evidences and references, which can be attached to your report on the website.

## Calling the Integrity Line by phone

To call from Bahrain on an outside line dial **800-00-001** or **800-000-00**  
At the prompt, dial **888-265-3470** (toll-free).  
To call from outside Bahrain, dial **+1 888-265-3470**

## Online

To make a report online, go to: **[www.alba.ethicspoint.com](http://www.alba.ethicspoint.com)**  
This website link is also provided on Alba's Intranet site and on its external website at: **[www.albasmelter.com](http://www.albasmelter.com)**



# 1. Valuing All People

## 1.1. Respect and Non-Harassment

### Respect

At Alba, we respect the beliefs and religious practices of people of all faiths. It is the responsibility of each employee to honour and respect the right of others to practice their religious beliefs in freedom. Interference with these rights and freedoms is a violation of the Bahraini law and this code. Employees are permitted to wear religious clothing or jewellery, but out of respect for the beliefs of others, employees should refrain from distributing or prominently displaying religious materials or symbols in the workplace or at company premises. Alba affirms the principles contained in the United Nations Charter, and in the Universal Declaration of Human Rights.

### Non-harassment

Alba seeks to provide a work environment that is pleasant, healthy, comfortable and free from intimidation, hostility or other offensive behaviours towards employees, contractors, vendors or customers. Harassment of any sort, including sexual, verbal, physical or visual, is strictly prohibited. The making of false accusations and defamatory statements, or derogatory statements about a person's colour, religion, gender, age, national origin, sexual orientation, gender identity or disability, whether verbal or written, is also strictly prohibited, as is the displaying or distribution of offensive or derogatory material.

If you believe that you may have been subjected to harassment, you should immediately report the occurrence to the HR Manager, or to your line manager, if this would be more comfortable for you. All complaints will be treated confidentially and will be promptly investigated.

## 1.2 Fair Treatment and Equal Opportunity

Alba's policy is to provide equal employment opportunity in conformance with all applicable laws and regulations to individuals who are qualified to perform a particular job. We administer our personnel policies, programmes and practices in a non-discriminatory manner in all aspects of the employment relationship, including recruitment, hiring, work assignment, promotion, transfer, termination, benefits and salary administration and selection for training.

Our employees are Alba's greatest assets. As such, all decisions that directly affect an employee's employment status will be fair and equitable. This manifests itself in three ways:

- 1)** Advancement will be on the basis of merit and performance. Clear and consistent criteria will be applied to candidates for vacant posts and the most capable will be promoted.
- 2)** Development is an essential aspect for all Alba employees. Alba seeks to provide an environment for improving your qualifications and skills in line with your employment position and responsibilities, and Alba's policies and plans.
- 3)** The Disciplinary Process will always be fair and equitable. If you are a party to a disciplinary review, you will have the opportunity to forward your case or grievance to the HR Department. You will be considered innocent of any alleged violation unless found otherwise. At all times, you will be kept fully aware of your rights and options and will have access to an appeals process if found to be in violation. Disciplinary actions will be prescribed according to Alba's Disciplinary Procedure and Guide. Please refer to this procedure or contact the HR Department for any additional information.



Employees that have no responsibilities for formulating or deciding on company policies have the right to join any of the Alba's labour unions.

Alba is committed to the elimination of all forms of forced and compulsory labour, and the abolition of child labour abuse.

- Q** My boss sometimes acts in a way that makes me feel uncomfortable – asking me out for drinks, asking me about very private information, or telling sexual jokes. What should I do?
- A** If your boss's behaviour is unwelcome to you and you don't feel comfortable discussing this with him or her directly, you can raise the issue and seek practical support from HR, who will treat your complaint as confidentially as possible while taking steps to stop the offensive behaviours. You can also use the Integrity Line.
- Q** A job that is opening in my department requires a lot of travel time. I've received an application from someone who is well qualified, but I am thinking of crossing her off the list for interviewing as I know that she is a mother with children still at school, and would therefore find it difficult to travel.

**A** You cannot make that assumption. Applicants should be judged on merit, and on whether they have the best skills, qualifications and experience to do the job. You cannot deny her the opportunity to be considered, or prejudice her application based on any other factor.

**Q** My manager met with me yesterday and told me I needed to improve my performance and attendance, or I will receive a poor increment, and may also face disciplinary action. I disagree with his assessment of my performance and was quite intimidated that he threatened my job security. Is this a violation of the Code of Conduct?

**A** Managers are expected to manage employee performance and to give employees honest feedback to ensure employees have the best opportunity to realise their full potential. Providing they are done in a respectful way (avoiding abusive language), such conversations would not be considered a violation of the Code of Conduct. You should discuss the situation with your manager and HR representative so you can fully understand their reasons for concern and their expectations.

For more information on this area, see the HR policies and guidelines posted on the intranet, or speak with your representative in HR.



“Alba's policy is to provide equal employment opportunity in conformance with all applicable laws”

## 2. Safety, Health and Environment

### 2.1 Policy and Commitment

Our aspirations are simple: to achieve zero injuries and work-related illnesses, and to ensure the protection of the environment wherever we conduct our business. We are committed to providing a safe, healthy, productive and comfortable working environment for our employees. All SHE principles, procedures and practices established and documented in the Alba SHE Management System must be followed at all times.

Improving safety behaviour is our top priority. Everyone is accountable for their own safety and no one can be instructed to work unsafely. Unsafe behaviour by anyone is not acceptable, as working safely is a condition of employment.

Simply obeying safety rules is not enough. Alba's commitment to safety means that each of us needs to be alert to safety risks as we go about our jobs.

You have a duty to report any accident, incident, or unsafe act or condition that you observe, and to cooperate in any investigation.

### 2.2 Substance Abuse

You are expected to be in suitable mental and physical condition while at work for the effective and safe performance of your duties.

The use or possession of any mood-altering substance (such as alcohol, non-prescription or illegal drugs) at the workplace, or on Alba-owned or leased business premises is strictly prohibited, as is the performance of work duties under the influence of these substances.

Alba reserves the right to search anyone on Alba premises for any of those items, and to require employees to submit to medical testing where there is cause to suspect the use of these substances.

“We are committed to providing a safe, healthy, productive and comfortable working environment for our employees”



**Q** Will I be penalized if I stop work because I have concerns about the safety of the activity?

**A** At Alba, we are committed to providing a safe place of work for everyone – that includes stopping work if we ever have concerns about safety. Alba will not tolerate retaliation against anyone who in good faith stops work that he/she considers to be unsafe – it is better to be safe than sorry.

**Q** One of my colleagues injured his hand during his shift, and it looks quite bad. I overheard the supervisor quietly suggesting that he goes to see a private hospital, and not report it to medical, as we are just short of achieving a milestone in our department's safety performance, and this would 'mess it up' for the team. What should I do?

**A** All injuries need to be promptly reported to the line manager, the SHE department, and Medical. This ensures that reporting requirements are met, that corrective actions are identified, and that the risks of accidents reoccurring are reduced. Speak to your line manager. If an accident is still not reported, you can report your concern via the Integrity Line.

**Q** My shoes are damaged, and I have been told that I can only get one pair of shoes per year. Can I replace them even though I've only had them for 6 months?

**A** At Alba, we have an obligation to provide adequate PPE for our employees, and therefore, any damaged PPE must be adequately repaired or replaced.

**Q** I am a maintenance technician and there is an urgent request to start a job, without obtaining a required permit. Should I go ahead?

**A** No. A Permit to Work is a necessary requirement for all applicable jobs, whether they are routine, non-routine or emergency. Make sure that a safe environment is provided before starting the job.

For more information on this subject, speak to your coordinator in the SHE department, or see the Safety, Health and Environmental policies and guidelines located on the Alba intranet.



# 3. Corporate Social Responsibility

## 3.1 Respect for the Law

The responsibility of every one of us is to understand and obey all the laws and regulations applicable to our role, and report any occurrences or circumstances that may have legal implications to the Alba Legal Manager.

You are also required to obey the laws of other countries when travelling on business trips or training courses.

Employees dealing with imports and exports should ensure that our practices are compliant with the regulations of the relevant countries, and with applicable international trade controls.

Employees dealing with customers should ensure that our practices don't abuse a dominant market position, and are compliant with competition laws in applicable countries. Never talk with or exchange information with competitors to:

- Fix prices charged to customers or prices paid to suppliers– this can include setting minimum or maximum prices, the amount or timing of a price increase, or any discussion or agreement that results in price coordination.
- Fix terms related to price, pricing formulas, credit terms, etc.
- Divide up markets, customers or territories.
- Rig a competitive bidding process.

Employees, particularly those in Procurement, Finance and Marketing, should ensure that our practices do not contravene international Money Laundering regulations, and should undertake appropriate due diligence enquiries regarding counterparties with whom funds are exchanged. Be wary of irregularities in the way payments are made or requested, and avoid dealing with counterparts with known or suspected criminal ties, or who appear to lack integrity in their operations.



“The responsibility of every one of us is to understand and obey all the laws and regulations applicable to our role”



For more information on this area, speak to the Legal Manager.



problems in the best interest of society and Alba. In doing so, employees should ensure that they do not appear to be acting as spokespeople for Alba unless they have prior permission from Alba.

Employees as individual citizens should maintain good relationships with society, including participating effectively in professional societies, licensed charities and community centres.

As an employee, you have the right to voluntarily participate in the political process, and attend political meetings in your personal capacity, in your personal time, and within the constraints of Bahrain law. No one at Alba may require you to contribute to, support or oppose any political group or candidate. You may not, however, work on, or promote a political campaign during official working hours, on Alba-owned or leased property, or by using Alba-owned or leased assets or systems such as computers, printers, photocopiers, and electronic mail. You should not display or distribute political material in the workplace or on company property.

- Q** A representative at another aluminium smelter called me and suggested that we divide up and 'rationalize' the market for products we both supply in Europe, by not competing with each-other in certain countries for certain products. This seems to make sense – the last thing we need is a price war.
- A** This would be classed as anti-competitive behaviour, and may have serious legal consequences. You must immediately speak to the Legal Manager about the conversation.

## 3.2 Community and Political Relations

We recognise that we have an important role to play in the welfare of society and that we have a responsibility to communicate, participate and cooperate with local authorities and with non-governmental organisations interested in the welfare of the society. We encourage all our employees to accept this responsibility and take part in discussions and activities designed to solve community

For more information on this area, speak with your representatives in the Public Relations or Human Resources departments.



# 4. Ethical Business

## 4.1 Conflicts of Interest

When an employee's personal, social, financial or political activities have the potential to interfere with, or appear to interfere with, the employee's loyalty and objectivity towards Alba, a 'conflict of interest' may exist that must be satisfactorily resolved. We all have a responsibility to always work in Alba's best interests and therefore must avoid situations and actions that may constitute, or create the appearance of a conflict of interest. All potential conflicts must be reported to your line manager in writing as soon as they arise. The simple act of disclosing the possibility of a conflict of interest and abiding by the instructions of your line manager in that respect release you from the risk of losing the trust placed in you to act in Alba's best interests. Failure to disclose a conflict may lead to disciplinary action.

While it is difficult to identify all circumstances leading to conflicts of interests, the following are examples thereof:

- Holding (either directly, or through a relative such as a spouse, sibling, parent, child, uncle, aunt, nephew, niece, grandparent, grandchild or parent- or sibling-in-law), a substantial financial interest in any enterprise with which Alba has business dealings, or is considering establishing business dealings (e.g. suppliers, contractors, vendors, competitors, customers and licensees). A substantial interest is one that might influence or appear to influence your judgment;

- Accepting, directly or indirectly, from any vendor or supplier of services, any gifts or entertainment that are described as inappropriate in the Gifts and Entertainment section of this code;
- Acting as a director, officer or employee of any non-affiliated business or other institution with which Alba has a business relationship;
- Directing a business opportunity from Alba for your personal interest;
- Using Alba assets (e.g. stationery, letterhead, funds, facilities, equipment, tools, personnel) or Alba specific technical information or expertise for the benefit of other business or personal interests;
- Engaging in outside activities that may adversely affect your impartiality or judgement or that may interfere with or adversely affect your ability to perform your official duties.



For more information on this area, speak with a member of Alba's Integrity Task Force.



Alba regularly employs relatives of current employees.

A relative should however, not have any business dealings with you, or with anyone who reports to you. In addition, you should never be in a situation where you have the ability to hire, supervise, affect terms and conditions of employment, or influence the management of a relative. Exceptions require specific approval by your line manager.

Never invest in a current or prospective supplier if you have any involvement in the selection or assessment of, or negotiations with, the supplier, or if you supervise anyone who has such responsibility.

Never invest in a customer if you are responsible for dealings with that customer or supervise anyone with such responsibility.

“We all have a responsibility to work in Alba's best interests and therefore must avoid situations and actions that may constitute, or create a conflict of interest”

## Outside Employment

Alba's employment contracts generally prohibit employment of its employees at any other organization, except for pro bono work at registered charitable organisations. Employees wishing to carry on a private enterprise should promptly inform their line manager and HR. HR will grant no objection letters where it is clear that no potential conflicts exist, and the enterprise will not affect the ability of the employee to fulfil his or her job.

Employees and contractors should not use Alba working hours or resources to conduct any private enterprise.

- Q** My brother is a manager for one of our suppliers. In my job at Alba, I also have contact with that company from time to time, and am thinking of asking them to quote on a job. Is this a problem?
- A** These circumstances must be brought to the attention of your line manager. It is important that all actual or potential conflicts be disclosed so that any issues can be anticipated and avoided.
- Q** I am an employee of Alba, and am also involved in a family business that I believe can offer services to Alba. We would like to register on Alba's vendor list. Do I need to disclose my relationship during registration?
- A** Yes, you have to disclose your relationship to your line manager, HR and the Procurement & Warehousing Department.





## 4.2 Bribery and Corruption

Corruption is any abuse of an official position for personal gain. Bribery is a form of corruption, and is the offering, giving, receiving or soliciting of any item of value to improperly influence the actions or decisions of an official or other person with official duties. Many countries have laws that enable them to criminally prosecute acts of bribery even when they are committed outside their own countries. We will not engage in Bribery or Corruption in any form.


You should not offer or ask for anything of value, including any service, gift, job or entertainment, and you should not accept any gifts, bribe or anything of value, whether directly or indirectly from any person, in order to improperly influence official acts and decisions or to obtain or maintain any privilege to any company or person.

The above prohibition includes payments made to officials to secure or speed up routine legal government actions, such as issuing permits, visas or releasing goods held in customs, unless these payments are made in accordance with an official pricing list of the government department.

Any instances of bribery or attempted bribery should be reported to your line manager, and to the Chief Internal Auditor.

You should not allow any third parties acting on behalf of Alba to contravene any of the above. If you have any reason to suspect that agents may be contravening the above, you should remind them of Alba's policy as stated here, insist on their compliance, and report any suspected contraventions.

“We will not engage in Bribery or Corruption in any form”

For more information on this area, speak with a member of Alba's Integrity Task Force. 

**Q** We need to get a key piece of equipment through customs quickly. I was told that I could hire a consultant with 'contacts' to speed up getting all the permits we need. He requested BD 5000 upfront to use to 'help smooth the way'. Since we don't really know where the money is going, do we have to worry about it?

**A** Yes, you do have to worry about it. You must find out where that money is going and for what purpose it is being used, to ensure that this money is not used as a bribe. The fact that it is being done by someone else, and that we have no evidence of a bribe is no excuse. Seek the advice of your line manager or Alba Internal Audit or Legal immediately.

**Q** I'm in the process of negotiating a good deal for Alba. The other party has indicated that it would help finalise the deal if we made a charitable donation to a cultural organisation as a good gesture. I've never heard of the charity he's proposing. Can I go ahead?

**A** No. This could be a vehicle for bribery, and you should report the request to your line manager. Donations can only be made by Alba's Public Relations Department.



## 4.3 Gifts and Entertainment

'Gifts' includes anything of value, provided to an individual or members of their family, including cash and non-cash items such as art work, equipment, preferential discounts, loans, favorable terms on any product or service, services, prizes, donations, transportation, use of vehicles or of vacation facilities, securities, participation in stock offerings, home improvements, tickets to recreational, cultural or sports events, and gift certificates. Courtesy 'Entertainment' includes meals, invitations to attend recreational, cultural or sports events, and any associated travel, accommodation, meals and refreshments.

In principle, there is nothing wrong with receiving or giving gifts of appreciation or goodwill. However gifts or entertainment of significant value, or in certain circumstances, can create a conflict of interest, or at least the appearance of a conflict, which could tarnish the company's reputation.


Gifts and entertainment valued at less than BD 50, and of a promotional nature endorsed with a corporate logo such as calendars, diaries, pen sets and calculators can be accepted, without the need to declare them, provided they are not included in the restrictions set out below.

If any gift or entertainment valued at over BD 50 or the local currency equivalent, is offered to you by any person connected with an outside organisation, with any connection to your job, you must immediately declare it to your line manager and manager in writing, even if the gift or entertainment is refused. If you are in any doubt about whether the item is below BD 50 in value, you should declare it.

You are prohibited from offering or accepting any gift or entertainment of any amount to or from anyone connected with an outside organisation, government department, or anyone else with whom Alba has or may be in the process of developing a business relationship with, where:

- the giving of such a gift or entertainment violates the policies or country laws governing either party. (special care must be taken when dealing with government officials as some countries do not allow officials to accept even low value gifts or entertainment).
- the intent could be, (or appear to be) to create improper influence, or to influence the recipient's objectivity in making a business decision.
- the gift or entertainment involves parties engaged in a tender or competitive bidding process. (business meals may be acceptable, provided that all of the other requirements of this section are met).
- the gift or entertainment is solicited, or is offered for something in return.
- the gift is in cash, or a cash equivalent.
- the gift or entertainment is indecent, sexually oriented, or otherwise might adversely affect Alba's reputation.

Any gifts or entertainment offered by or to another party, which together are valued at more than BD 500 in any one year, must be approved in advance by a Chief Executive Officer. It is acceptable to receive a gift above this limit if it would be insulting to decline it, and provided that it is not included in the above prohibitions, but the gift must be reported to line management who will decide whether it can be kept for the benefit of Alba, sold, with the proceeds donated to charity, or returned to the donor.

For more information on this area, speak with a member of Alba's Integrity Task Force. 

## 4.4 Protecting our Assets against Fraud, Theft and Misuse

We will at all times act honestly and with integrity, and safeguard those of Alba's assets and resources for which we are responsible.

### Misuse of Assets

You are responsible for ensuring that Alba property that you use or come into contact with as part of your work is not damaged, misused or wasted. You also have a duty of care to report the abuse of Alba property by others.

### Fraud and Theft

Fraud and theft are violations of the law and of this Code. Alba views fraud as an extremely serious matter and is committed to the promotion of an anti-fraud culture throughout the organisation. Protect Alba's funds as you would your own: guarding against misuse, loss, fraud or theft. Ensure that all transactions are properly authorised and accurately and completely recorded.

Types of fraud and theft include but are not limited to:

- signing, cancelling, creating, destroying or amending documents by fraudulent means.
- assuming a false name or capacity.
- disposing of property without being authorised by its owner.
- making false claims to qualifications and experience.
- misappropriation of funds or assets, e.g. budget or expenses including petty cash etc.
- deliberate misinterpretation of information.



- unauthorised use of Alba or contractor manpower, vehicles and equipment.
- attempts to conceal any of the above.

### Reporting fraud or theft

You have a duty to report details immediately if you suspect that a fraud has been committed or see any suspicious acts or events. These should be reported to your line manager (unless you feel uncomfortable doing so), and to a member of the Integrity Task Force (ITF)

The ITF is comprised of the Chief Internal Auditor, the Chief Administration Officer and the Manager of Legal and is responsible for oversight of any reported or suspected fraud. Whenever a fraud is reported or suspected, the ITF will assess whether an investigation is warranted, and will determine who will lead the investigation.

You should co-operate fully with whoever is conducting internal checks, reviews or fraud investigations.

Alba will not tolerate retaliation against those that raise concerns in good faith, even if the concern turns out to be unfounded.

If you feel uncomfortable communicating with any of the above, you can use the Integrity Line reporting system described in this code. Your identity will be kept in confidence and will not be disclosed without your consent.

“We will all times act honestly and with integrity, and safeguard those of Alba's assets and resources for which we are responsible”

employees and documents. At the same time ensure that the confidential information section of this Code is complied with, by ensuring that no unauthorised access or information is provided to any third party that has no jurisdiction.

If you are asked to provide information in connection with a government or regulatory agency enquiry or investigation, you must make sure that any information you provide is truthful and accurate, and that Alba's legitimate interests are protected. Seek advice from the Alba Legal Manager if you are uncertain regarding a non-routine request.

## 4.5 Accurate Reporting

All information that Alba employees create, whether financial or non-financial, and whether paper or electronic, must accurately reflect transactions and events.

Financial data (e.g., books, records and accounts) must conform to International Financial Reporting Standards, and other relevant Generally Accepted Accounting Standards.

Never make a false or misleading entry in a report, document, record or expense claim. In the event that estimation is required to be included while recording transactions, best judgment should be used in conjunction with adherence to IFRS guidelines.

Make sure that other information (e.g., Safety, Health or Environmental performance, HR records, quality data, regulatory filings and other essential company information) must also be accurate.

Co-operate fully with Internal Audit, providing them with accurate information and, on request, allow them unrestricted access to



**Q** It is the last week in the quarterly reporting period. My boss wants to make sure we meet our numbers for the quarter, so he asked me to record an unconfirmed sale now that won't be finalized until next week. I guess this won't hurt anyone – should I do what he says?

**A** No. Costs and revenues must be recorded in the correct time period as required by the matching principle in IFRS. If the sale is not yet complete, it would be a misrepresentation and could amount to fraud to include it in an earlier period.

# 5. Information & Confidentiality

## 5.1 Confidential Information

Many of our employees have been placed in positions of trust in which they are exposed to or have access to employee payroll data, personnel records, vendor and service contracts, operational data, licence agreements, financial information and other types of sensitive information that is considered confidential or personal in nature.

### Protecting our Knowledge

It is vital to control the flow of data and information from within Alba, and to protect and maintain the knowledge that we have. Deliberate misuse of Alba's knowledge for personal gain or for the benefit of a competitor is a serious breach of this code. Whether you are a current or former employee, you are reminded of the covenants of confidentiality in your employment contract, and that revealing any type of confidential or sensitive information is a violation of that trust. If you have any questions or doubts about what is considered confidential information or may constitute a violation of trust, you are urged to seek advice from your line manager. Current and former employees may not release any communications, documents or information that could in any way be considered as sensitive without prior written approval from Alba.

### Personal Information

Many countries have stringent rules restricting the sharing or transfer of personal data relating to employees, customers and other individuals. Accordingly, when sharing personal information with those outside Alba, you must obtain prior authorisation to do so from your supervisor or the company's management.

In order to ensure the accuracy and objectivity of information concerning current or former employees, you are required to refer any calls or written requests to release information such as personnel, medical and other records, to the HR Department. Any employee who reveals or releases information about a current or former employee without specific authorisation will be subject to disciplinary action.

Information is to be retained and disposed of, in accordance with Alba's document retention policy.

For more information on this area, see the IT and HR policies and guidelines located on the Alba intranet, or speak to your representatives in those departments.



### Copyrights or Confidential Information of others

Do not bring to Alba any confidential documents, including computer records, from prior employers, or share information relating to prior employers that is confidential.

Do not knowingly infringe a valid intellectual property right of another party.

### Insider Trading

Trading in shares on the basis of insider information (material information not available to the public, such as major investment decisions, contracts, exposures, incidents, or financial results) is illegal.

Do not trade in the shares of Alba or any other company on the basis of insider information, and do not disclose inside information to anyone outside the company without prior approval. If you think you may have insider information, speak to the Legal Manager about requirements that may apply to you, before trading in shares.





## 5.2 Representing Alba, and contact with the media

Alba seeks to develop a positive relationship with members of the media, government officials, community leaders and business partners. To ensure consistent communications with all our key external audiences, it is critical that these communications are managed in a coordinated way. All public relations activities and contact with the media and senior government officials must be handled only by or with the approval of the Chief Executive Officer.

You must be careful to distinguish between speaking personally, and in an official capacity on behalf of Alba. If you do not have explicit authority to make statements to the media and you receive enquiries from a media representative, you must make no comment other than to refer the media representative to the Public Relations Department.

Formal speaking engagements on behalf of the company must be cleared by your Chief, in consultation with the Public Relations Department.

For more information on this area, speak with a member of the Public Relations Department.



## 5.3 Use of Information Technology

The IT system belongs to the company, and should be used solely for Alba's purposes. In giving employees and authorised contractors access to systems and technology, we expect these employees and contractors to be responsible in its use. You must comply with Alba's Computer Usage, and other IT policies, and be careful not to be involved in unauthorised actions such as:

- Accessing or attempting to access data or files of others held on their PCs or directories.
- Tampering with software or hardware.
- Illegal downloading or copying of copyrighted software.
- Releasing of confidential data or sharing of confidential information with others.
- Attempting to intrude or hack into Alba's computers or PCs.
- Unauthorised use, sharing or disclosure of user ID's and passwords.

You should be aware that Alba may monitor computer use, including email, and data stored in personal and other folders, to verify compliance with its computer users' policies. Any violations will be subject to disciplinary action.

For more information on this area, see the IT policies and guidelines located on the Alba intranet, or speak with your representative in the IT department.



## **Ask before acting:**

- 1) Is it legal?
- 2) Does it comply with this code and other Alba policies?
- 3) What would my colleagues, manager or family think about this?
- 4) How would this look reported in the newspaper?
- 5) Does it feel right?

## **Where can I go for help?**

Speaking with your line manager is always a good place to start. You can also speak with a member of the Integrity Task Force, which consists of:

- The Chief Internal Auditor
- The Chief Administration Officer
- The Legal Manager

If you would prefer, you can also make use of Integrity Line, where you can report in full confidentiality

## **Calling the Integrity Line by phone**

To call from Bahrain on an outside line dial

**800-00-001** or **800-000-00**

At the prompt, dial **888-265-3470** (toll-free).

To call from outside Bahrain, dial **+1 888-265-3470**

## **Online**

To make a report online, go to:

**[www.alba.ethicspoint.com](http://www.alba.ethicspoint.com)**

This website link is also provided on Alba's Intranet site and on its external website at:

**[www.albasmelter.com](http://www.albasmelter.com)**