ALUMINIUM BAHRAIN B.S.C. (ALBA)

ANTI-MODERN SLAVERY POLICY

DATE OF IMPLEMENTATION:	22 SEPTEMBER 2026
OWNER:	COMPLIANCE FUNCTION

1. DEFINITIONS

Alba: means Aluminium Bahrain B.S.C., incorporated under the laws of the Kingdom of Bahrain, and shall include (i) its branch offices in Switzerland and Singapore, (ii) its subsidiary in the United States of America, and (iii) any other subsidiary, branch, or joint venture under Alba's operational control from time to time (collectively, "**Alba**").

Associated Parties: means any individual or entity that performs services for, represents, supports, assists or conducts business on behalf of Alba, whether directly or indirectly, and whether formally or informally. This includes, without limitation, suppliers, contractors, consultants, agents, intermediaries, distributors, joint venture partners, customers, advisors, sponsors, government agencies, and any other third party engaged in connection with Alba's business activities or acting for or on behalf of Alba.

BARMC: Alba Board Audit and Risk Management Committee.

Board: the board of Directors of Alba.

Code of Conduct: a set of expectations and guidelines to all those working for Alba to ensure that the highest standards of integrity and personal conduct are upheld in their business and professional activities, and when dealing with colleagues, vendors, customers, contractors, government agencies and the public, as may be amended from time to time and published on Alba's website (*Code of Conduct - ENG*).

Data Retention Policy: means Alba's Document Retention Policy (Policy 01-94), as may be amended from time to time and approved by the Board.

Director(s): member(s) of the Board of Directors of Alba.

Employees: members of the Board, senior management, officers, employees (permanent, temporary or seconded), interns and trainees across Alba.

Integrity Line: the whistleblower hotline program consisting different mechanisms or initiatives designed to encourage and collect reports from parties with information about potential wrongdoing or misconduct via phone or online in full confidentiality.

Integrity Task Force: a team consisting of senior management of Alba as approved by the Board to promote, safeguard, and enforce integrity, ethics, and compliance standards.

Modern Slavery: means slavery, servitude, forced or compulsory labour, human trafficking, child labour, debt bondage or other comparable forms of exploitation in which a person is deprived of their freedom or compelled to provide labour or services through coercion, threats, deception, abuse of power or other unlawful means.

Policy: means this Anti-Modern Slavery Policy.

Whistleblowing Policy: Alba's Whistleblowing Policy as approved and as may be amended from time to time.

2. PURPOSE AND STATEMENT OF COMMITMENT

2.1 This Policy forms part of Alba's governance, compliance and risk management framework and sets out the principles, responsibilities and controls for preventing, identifying, reporting and addressing Modern Slavery in accordance with applicable laws and regulations.

2.2 Alba is committed to conducting its business responsibly, ethically and in compliance with applicable laws and internationally recognised human rights and labour standards. Alba adopts a zero-tolerance approach to Modern

Slavery and seeks to prevent and address related risks across its operations, workforce, supply chain and business relationships.

2.3 In furtherance of this commitment, Alba seeks to:

a) prevent Modern Slavery in its operations and business relationships;

b) identify, assess, manage and monitor related risks and adverse impacts through appropriate due diligence and controls;

c) promote responsible recruitment, employment, procurement and contracting practices;

d) provide accessible reporting channels and protect individuals who raise concerns in good faith from retaliation;

e) support remediation where appropriate;

f) raise awareness through training and communication; and

g) continuously monitor and improve the effectiveness of this Policy.

2.4 Alba shall not knowingly use, tolerate or benefit from Modern Slavery and shall not tolerate forced or compulsory labour or unlawful child labour. Alba is committed to respecting the dignity and human rights of individuals with whom it interacts and to conducting its business in a manner that seeks to prevent exploitation and abuse.

2.5 Without limitation, this Policy is aligned with and informed by the following legal and regulatory frameworks as may be amended from time to time:

a) The relevant provisions of Legislative Decree No. 15 of 1976 with respect to enactment of the Penal Code, including laws relating to unlawful deprivation of liberty, coercive conduct and exploitation;

b) Law No. 1 of 2008 regarding the combat of trafficking in person;

c) Decree No. 7 of 1990 regarding accession to the slavery convention (signed on 25 September 1926, amended by the Protocol signed on 1953, and to the Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery of 1956);

d) Law No. 37 of 2012 promulgating the Child Law;

e) Ministerial Order No. 23 of 2013 concerning the employment of minors;

f) Law No. 36 of 2012 promulgating the labour law of the private sector (as amended), including any regulations passed pursuant to the labour law;

g) Law No. 19 of 2006 with respect to regulating the labour market, and any applicable labour market and employment requirements administered by the competent authorities, including Bahrain's Labour Market Regulatory Authority (LMRA) where relevant;

h) The Universal Declaration of Human Rights;

i) United Nations (UN) Guiding Principles on Business and Human Rights;

j) The United Kingdom Modern Slavery Act 2015;

k) the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct;

l) OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;

m) International Labour Organisation (ILO)'s Labour Standards; and

n) Any other applicable international or local Modern Slavery legislation or regulatory framework relevant to Alba's operations.

2.6 Where conflict arises between the requirements of this Policy and any applicable law or regulation, the higher or more stringent standard shall apply. Where local law permits conduct that is prohibited by the Policy, the provisions of this Policy shall prevail in protecting Alba's governance, legal and ethical standards.

3. SCOPE

3.1 This Policy applies to all Employees and Associated Parties.

3.2 This Policy extends to all Alba business dealings with both private and public sector entities and across all jurisdictions in which Alba operates and to dealings with customers, suppliers, intermediaries, agents, consultants, joint venture partners and other counterparties. All persons covered by this Policy are required to comply with its provisions as well as all applicable laws, rules and regulations.

3.3 This Policy shall be read together with Alba's Code of Conduct and any other relevant Alba policies, procedures, frameworks, and shall be interpreted and implemented consistently with those documents.

3.4 Alba recognises that Modern Slavery risks may arise through its relationships with Associated Parties, including through their own supply chains. Alba expects its Associated Parties to:

a) comply with the applicable laws relating to Modern Slavery and respect internationally recognised human rights and labour standards;

b) maintain appropriate measures to prevent Modern Slavery within their operations; and

c) cooperate with Alba in addressing material concerns identified in connection with their relationship with Alba.

3.5 Where appropriate, Alba shall incorporate anti-Modern Slavery requirements into its procurement and contractual arrangements. Depending on the nature and level of risk, such requirements may include contractual commitments, representations and understandings, information requirements, due diligence, assessment or audit rights, subcontracting controls and corrective action requirements.

4. ROLES AND RESPONSIBILITIES

Role	Responsibility
Board of Directors	• Ultimate responsibility for oversight of this Policy. • Approves this Policy and any material amendments. • Ensures effective governance, internal controls and risk management measures to prevent and mitigate Modern Slavery risks across Alba's operations and supply chain.
BARMC	• Provides focused oversight of Modern Slavery risks. • Reviews the effectiveness of Alba's anti-Modern Slavery framework. • Monitors the implementation of remediation and corrective actions. • Oversees the effectiveness and independence of relevant control and compliance functions.
Senior Management	• Ensure implementation of this Policy across Alba. • Embeds Modern Slavery risk management practices into day-to-day operations and decision-making. • Ensures appropriate procedures, systems, resources and controls are in place to prevent and address Modern Slavery risks. • Addresses issues and concerns escalated under this Policy promptly and effectively.
Procurement & Warehousing/ Strategic Supply & Planning	• Integrate Modern Slavery risk considerations into procurement, sourcing, onboarding, contracting and supplier management activities. • Conduct and maintain risk-based due diligence on Associated Parties relevant to its function in accordance with this Policy and Alba's applicable procedures. • Remain alert to indicators and red flags of Modern Slavery within Alba's supply chain and promptly escalate any actual or suspected concerns in accordance with this Policy. • Cooperate with the compliance function in connection with supplier risk assessments, investigations, monitoring activities and remediation measures relating to Modern Slavery risks.
Human Resource (Social Management Section)	• Supports the implementation of responsible recruitment and employment practices designed to prevent Modern Slavery risks. • Provides support in relation to worker welfare and remediation measures involving Employees where appropriate and assists relevant functions with awareness initiatives. • Escalates actual or suspected Modern Slavery concerns identified through recruitment, employment or worker welfare processes in accordance with this Policy.

Compliance Function	• Maintains and updates this Policy and related procedures. • Advises the business on Modern Slavery matters. • Supports and oversees due diligence, risk assessments and compliance monitoring activities relating to Associated Parties and business relationships. • Reviews escalations, reports and allegations of actual or suspected Modern Slavery. • Coordinates investigations with relevant functions where appropriate. • Maintains relevant records and documentation. • Escalates significant concerns or actual breaches of this Policy to internal audit and senior management.
Business Units	• Apply this Policy in practice within the respective functions and activities. • Conduct and maintain due diligence on customers, counterparties and other business relationships within their areas of responsibility prior to business relationships in line with internal policies and this Policy. • Remain alert to red flags and indicators of Modern Slavery. • Promptly report concerns, suspected violations or adverse impacts in accordance with this Policy. • Cooperate with compliance reviews, investigations and remediation activities.
Internal Audit	• Periodically assess the adequacy and effectiveness of controls relating to the prevention, detection and management of Modern Slavery risks. • Conduct reviews and investigations into potential non-compliance with this Policy and recommend corrective actions where appropriate.
Employees and Associated Parties	• Understand and comply with this Policy. • Participate in mandatory training and awareness programmes. • Exercise vigilance in carrying out their duties. • Report actual, suspected or potential instances of Modern Slavery, or any related concerns, in accordance with this Policy. • Failure to comply with this Policy may result in disciplinary action, contractual consequences or other action permitted under applicable law.

5. REPORTING, INVESTIGATION AND REMEDIATION

5.1 All Employees and Associated Parties have a duty to promptly report any suspected, actual or attempted violation of this Policy, in accordance with Alba's Whistleblowing Policy.

5.2 Reports may be made through line managers, internal audit, the Integrity Task Force ("**ITF**"), the Integrity Line or any other officially designated reporting channel approved by Alba. Reports may be made anonymously where permitted by law and shall be handled with strict confidentiality, subject to legal and regulatory requirements.

5.3 Alba strictly prohibits any form of retaliation, victimisation, intimidation or adverse treatment against any person who, in good faith, reports concerns or participates in an investigation.

5.4 All reported incidents shall be investigated objectively, independently and promptly in accordance with Alba's policies and procedures. Investigations shall be properly documented, and outcomes shall include appropriate corrective and remedial actions where required.

6. CONSEQUENCES OF NON-COMPLIANCE

6.1 Any failure to comply with this Policy shall be treated as a serious breach of Alba's governance, compliance and ethical obligations and may also constitute misconduct under Alba's disciplinary code and Human Resources policies and depending on the nature and severity of the violation, this may result in disciplinary action, suspension, termination of employment or contract, referral to regulatory authorities and/or initiation of civil and/or criminal proceedings.

6.2 Alba reserves the right to enforce all contractual, legal and regulatory remedies available to it against any individual or entity found to have violated this Policy.

7. TRAINING AND AWARENESS

7.1 Alba through its compliance function and Training Department shall implement comprehensive training and awareness programmes to ensure that all Employees and relevant third parties understand their obligations under this Policy and the applicable legal and regulatory framework.

7.2 Training shall form part of Employee induction and shall be delivered at least once a year or whenever there are major updates to this Policy, with targeted and enhanced training provided to personnel in high-risk roles or functions, including procurement, commercial, sales, logistics and government facing roles.

8. RECORD KEEPING

Alba shall maintain accurate, complete and traceable records relating to the implementation of this Policy and the management of Modern Slavery risks. Such records shall be securely retained in accordance with Alba's Data Retention Policy and applicable legal and regulatory requirements.

9. COMMUNICATION OF THIS POLICY

9.1 This Policy shall be made available to all Employees and Associated Parties.

10. POLICY REVIEW, VERSION CONTROL AND AMENDMENTS

10.1 This Policy shall be reviewed periodically to ensure its continued suitability, effectiveness and alignment with applicable laws, regulatory developments and recognised human rights standards relating to Modern Slavery. As a minimum, the Policy shall be reviewed every two (2) years, or earlier where there are material changes in applicable legislation, regulatory guidance, Alba's operations, supply chains, business relationships or Modern Slavery risk profile. In this regard, the compliance function of Alba shall be responsible for initiating the review process.

10.2 This Policy, and any subsequent amendments, shall be approved by the competent governance authority of the Alba group in accordance with its internal approval framework and shall become effective from the date of such approval.

10.3 A controlled version of this Policy shall be maintained by the compliance function. Each version shall clearly state the version number, approval date, and effective date. Superseded versions shall be archived in accordance with Alba's document retention requirements and shall no longer be relied upon for operational or compliance purposes.

10.4 The current version of this Policy shall be communicated to all relevant stakeholders and made accessible to Alba's Employees and Associated Parties through appropriate channels to ensure awareness and ongoing compliance.