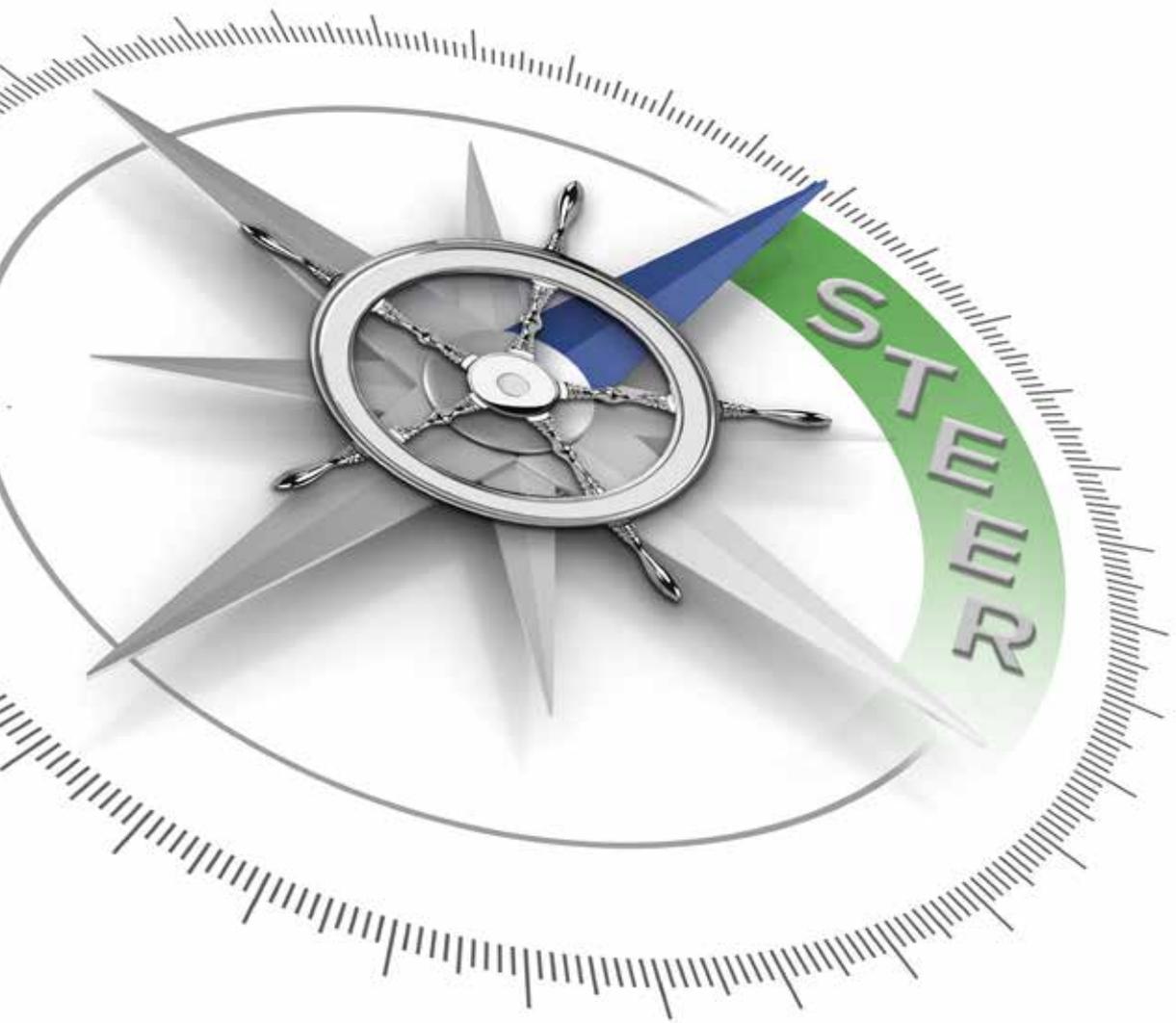


alcoa

Aluminium
for the world

Code of **Conduct**



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VISION

To be the number one aluminium supplier for the generations to come.

MISSION

Being a responsible corporate citizen, we want to create value for all our stakeholders and society.

VALUES

Safe & Green
Together
Ethics
Excellence
Resilience



Foreword from the Chief Executive



Dear colleagues,

Welcome to our Code of Conduct (the Code), which guides everything we do to make an impact on our society.

We are all, without exception, subject to the provisions of this Code as we strive to achieve the highest standards in business ethics. This Code is our commitment beyond compliance with laws and regulations and will guide us to make the right choice when facing any situation.

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.

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

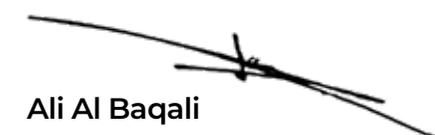
Over the last 5 decades, we have evolved to be one of the largest Aluminium smelters in the world by practicing this simple governance motto ‘Be and Follow the example of the best’ to remain true to our commitments to our people, partners, investors, community, and other stakeholders.

Each one of us needs to know, understand, and apply this Code in our day-to-day operations irrespective of our function or level in Alba. Our Code of Conduct is definitive and cannot be negotiated. We want to do what is right in everything we do.

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.

Counting on everyone to bring this Code to life!


Ali Al Baqali

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.

It aims 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 policies.



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 it. 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 (ITF), which consists of the Chief Internal Auditor, the Chief Supply Officer and the Legal Manager. However, if you feel uncomfortable using one of these resources, you may also contact Integrity Line 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.

Alba's Integrity Line

If you ever feel uncomfortable speaking to others directly, Alba has also implemented a reporting 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 or other matters that could potentially prove damaging to the company. It is called Integrity Line and it 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, security 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.

Wherever possible, support your report with documentary evidence and/or references, which can be attached to your report on the website.



Reporting via the Integrity Line

 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

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



Valuing All People

1.1 Respect and Non-Harassment

1.2 Fair Treatment and Equal Opportunity

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

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 rights 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 jewelry, 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 the Company's premises. Alba affirms the principles contained in the United Nations Charter and 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 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 endeavors 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 five 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.
4. Employees that have no responsibilities for formulating or deciding on company policies have the right to join any of Alba's labour unions.
5. Alba is committed to the elimination of all forms of forced and compulsory labour and the abolition of child labour.



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 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 give honest feedback to ensure employees have the best opportunity to realise their full potential. The feedback, if done in a respectful way (avoiding abusive or threatening language), 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 in this regard, see the HR policies and guidelines posted on the intranet, or speak with your representative in HR Department.



Safety & Health Environment, Social and Governance (ESG)

- 2.1 Policy and Commitment
- 2.2 Substance Abuse
- 2.3 Community

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

2.1 Policy and Commitment

Sustainability is a strategic priority for Alba. Each of us is responsible for operating safely at all times, protecting the environment and promoting social responsibility.

Our aspirations are simple: to achieve sustainable success for our value-chain, our employees and the local community, 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 Safety, Health and Environment (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. Alba's business and operations are guided by its three main Safety Principles:

- **Ownership of SAFETY and ENVIRONMENT is everyone's responsibility**
- **Working SAFELY as ONE TEAM is a condition of employment; and**
- **All work-related injuries and illnesses are PREVENTABLE.**

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 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 the said items, and ask employees to submit to medical testing where there is cause to suspect the use of these substances.

2.3 Community

We recognise that we have an important role to play in the welfare of society and 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 problems in the best interest of society and Alba. In doing so, employees should ensure that they do not appear to be acting as spokesperson 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.

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



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 Alba Healthcare/Medical Centre, 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 Alba Healthcare/Medical Centre. This ensures that reporting requirements are met, corrective actions are identified and risks of accidents reoccurring are reduced. Speak to your line manager, and if the 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 the 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 SHE policies and guidelines on the Alba intranet.



Ethical Business

- 3.1** Conflicts of Interest
- 3.2** Anti-Competitive Practices
- 3.3** Anti-Money Laundering
- 3.4** Bribery and Corruption
- 3.5** Gifts and Entertainment
- 3.6** Protecting our Assets against Fraud, Theft, and Misuse
- 3.7** Accurate Reporting
- 3.8** Political Activity

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



3.1 Conflicts of Interest

When an employee's personal, social, financial or political activities have the potential to interfere 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, releases 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.

For identifying situations / scenarios where a conflict of interest may exist, evaluate whether the respective employee:

- Is holding (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 interest in any enterprise with which Alba has business dealings, or is considering establishing business dealing (e.g. suppliers, contractors, vendors, competitors, customers and licensees). A substantial interest is one that might influence or appear to influence his/her judgement
- Is acting as a director, officer or employee of any non-affiliated business or other institution with which Alba has a business relationship
- Has a personal financial or other personal incentive to favour the interest of one customer/supplier/stakeholder or group of customers/suppliers/stakeholders over the interests of another.
- Conducts the same business as the customer/supplier/stakeholder.
- Receives, or will receive, directly or indirectly, a benefit (monetary and/or non-monetary) from a third party in relation to a service provided to a customer/supplier/stakeholder that is likely to impair the ability to act in the best interest of the customer/supplier/stakeholder.
- Engage in outside activities that may adversely affect the employee's impartiality or judgement or that may interfere with or adversely affect the ability to perform official duties.
- Use 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;



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

Alba often 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. All employees must declare their relatives / change in relationship leading to potential conflict of interest scenarios, to HR & Training Department as well as to their immediate 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.

Outside Employment

Potential conflict of interest may arise when an employee also holds appointments which are external to the Company. An employee is expected to be independent to act in the best interest of the Company. If an employee is appointed or is remunerated in entities with whom the Company has a business relationship, it may be perceived as a conflict of interest.

- Employee wishing to carry on a part time job shall promptly inform their Line Manager and Manager - Human Resources (HR), provided it will not impact / affect his or her day-to-day duties with Alba. HR will grant no objection letters where it is clear that no potential conflicts exist.
- Employee wishing to carry out private establishment shall promptly inform the HR Manager and get a "No Objection Letter".
- Employee should not use Alba's working hours or resources to conduct activities of the private enterprise which the employee is involved in.



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.





3.2 Anti-Competitive Practices

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.

All employees, in particular those 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, i.e. international sanctions or the like.

Employees dealing with customers should ensure that their practices don't abuse a dominant market position, they do not engage in anti-competitive practices and are compliant with competition laws in applicable countries.

Such abuse or anti-competitive practices may include but are not limited to:

- directly or indirectly imposing unfair purchase or selling prices or other unfair trading conditions;
- limiting production, markets or technical development to the prejudice of consumers;
- applying dissimilar conditions to equivalent transactions with other trading parties, in order to placing them at a competitive disadvantage;
- Selling a commodity or service at a price below cost, with the intention of forcing competitors out of the market.
- Imposing restrictions on the supply of a commodity or service, with the intention of creating an artificial shortage in its availability in order to raise prices.
- Imposing special conditions on selling and purchasing transactions or on dealing with another firm, in a manner that puts it in a weak competitive position compared to other competing firms.
- Refusing to deal with another firm without justification in order to restrict its entry into the market.
- Make conclusion of a contract with respect to certain product, subject to accepting obligations or products which, by nature or commercial usage, have no link to the subject of the original contract, agreement, or transaction
- Refusing to buy or sell products, or selling of products at a price lower than its actual cost, in order to eliminate competition.



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.

3.3 Anti-Money Laundering

Alba prohibits and actively prevents money laundering and the financing of terrorism, by deploying the highest operating standards to ensure that all its activities are undertaken within the legal parameters.

Any person, who shall commit any of the following acts shall be considered a perpetrator of Money Laundering:

- Acquiring, transferring, keeping or possessing money whether directly or indirectly, in whole or in part, from any criminal activity
- Hiding the nature, source, location, method of disposal, movement or ownership of the money acquired from any criminal activity

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.



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



3.4 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.

Alba is committed to applying the highest standards of ethical conduct and integrity in its business activities. Alba considers that bribery and corruption would have a detrimental impact on business by undermining good governance and destroying free markets. Accordingly, Alba has zero tolerance for the use of its products or services in facilitating bribery or corruption by employees, customers, suppliers, counterparties, management or associated parties.

All employees are required to ensure that any activity undertaken through their role at Alba is conducted ethically, accurately, transparently and is appropriately disclosed and recorded.

It is prohibited for Alba or any of its management and employees to (directly or indirectly):

- Give, promise to give, or offer, a payment, gift or entertainment to a third party or otherwise engage in or permit a Bribery offence to occur, with the expectation or hope that an advantage in business will be received, or to reward a business advantage already given;
- Give, promise to give, or offer, a payment, gift or entertainment to a third party to “facilitate” or expedite a routine procedure unless these payments are made in accordance with an official governmental pricing list;
- Accept payment, gift or entertainment from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided in return;
- Threaten or retaliate against another employee or worker who has refused to commit a Bribery offence or who has raised concerns

Any instances of bribery or attempted bribery should be reported to your line manager, Integrity Task Force (ITF) or through Integrity line. 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.



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.

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

3.5 Gifts and Entertainment

‘Gifts’ includes anything of value provided to an individual or members of their family, including (but not restricted to) cash and non-cash items such as artwork, equipment, preferential discounts, loans, favorable terms on any product or service, 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 or the like.

‘Courtesy Entertainment’ or ‘Entertainment’ includes (but is not restricted to) invitations

- to attend recreational, cultural or sports events, and any associated travel, accommodation, flower bouquets, books, meals, and refreshments
- related to sponsorships
- used as a marketing tool for a certain event,
- as part of being partners with other stakeholders or getting invited by the stakeholders for an event.

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.

A Prohibited Gifts & Entertainment

Employees 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; and
- the gift or entertainment is indecent or otherwise might adversely affect Alba's reputation.

B Gifts & Entertainment – Acceptable / Offered without the need to declare

Gifts valued at less than BHD 50 and which are of a promotional nature, endorsed with a corporate logo such as (but is not restricted to) calendars, diaries, pen sets, and stationary can be accepted /offered, and/or courtesy entertainment without the need to declare them provided they are not included in the restrictions set out above.

C Gifts & Entertainment – Acceptable / Offered with approvals

- **Gifts offered to Alba:**
At the first instance, the Gift should be refused and reported to his/her Line Manager and Manager PR in writing and registered in the 'Gifts Register'.
 - ▶ If it is insulting to decline it, then it can be accepted, provided that it is not included in the above prohibitions. Any gift, up to BD 50 should be approved by the PR and Line Managers (Non-Promotional nature)
 - ▶ Gifts from BD 51 up to BD 100 should be approved by the respective CXO, Line Manager and PR Manager. (Promotional or Non-Promotional nature)
 - ▶ Gifts above BD 100 should be rejected on spot, if not, then handed over to PR Manager. The Executive Committee (Executives, Admin Director, and PR Manager) on a periodic basis or whenever required, shall review and decide whether it can be kept for the benefit of Alba, donated to Charity, or returned. (Promotional or Non-Promotional nature)
 - ▶ All such gifts shall be registered in the 'Gifts Register'.
- **All gifts offered by Alba** internally or externally (excluded from point B) shall go through the review of PR Department and comply with the relevant PR and Procurement procedures. All such gifts shall be registered in the 'Gifts Register'.

 For more information on this subject, and/or to understand other scenarios involving Conflict of Interest, speak with a member of Alba's Integrity Task Force.



3.6 Protecting our Assets against Fraud, Theft and Misuse

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

Misuse of assets

You are responsible for ensuring that any 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.
- ▶ unauthorized 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 Supply Officer and the Legal Manager 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.



3.7 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 the International Financial Reporting Standards and other relevant 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 the International Financial Reporting Standards (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 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.



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.

3.8 Political Activity

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.





Information & Confidentiality

- 4.1** Confidential Information
- 4.2** Representing Alba, and contact with the Media
- 4.3** Use of Information Technology

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*Confidentiality is the essence
of being trusted*”

4.1 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, including Bahrain, 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.

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.

Any employee who is in possession of inside information shall not use such information to:

- Deal in any securities to which that information relates;
- Encourage any person to deal in any securities to which that information relates;
- Disclose inside information to any other person, otherwise than in the performance of the functions of his/her employment, office or profession;
- Violate the rules governing the publishing of market information.
- "Deal" includes trading both on and outside of the Bahrain Bourse.

4.2 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 corporate/public communications with media and senior government officials must be handled by Director Investor Relations and 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 Investor Relations and Corporate Communications Department. Formal speaking engagements on behalf of the company must be cleared by your Chief Executive Officer, in consultation with the Investor Relations and Corporate Communications Department.

We have a shared identity as Alba employees, but we are also individuals with our own thoughts, opinions and interests. Outside work, many of us blog, post on social networks and contribute to various social media platforms. Because what we say through email, blog, post or tweet can reach the public, affecting our reputation, for better or for worse, it is our duty to engage with social media conscientiously. We all have a responsibility not to disclose the Company's confidential and proprietary information or photographs/ videos without prior authorization. No one is authorized to share the Company's official news, without having Alba first disseminating such news on its social media platforms



For more information on this area, speak with a member of the Investor Relations & Corporate Communications Departments.

4.3 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:

- Chief Internal Auditor
- Chief Supply Officer
- Legal Manager

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

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

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

www.albasmelter.com



Aluminium
for the world