

ALUMINIUM BAHRAIN B.S.C (ALBA)
WHISTLEBLOWING POLICY

DATE OF IMPLEMENTATION: 11 NOVEMBER 2025

OWNER: INTERNAL AUDIT

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1. INTRODUCTION AND OBJECTIVE

In accordance with Alba's Corporate Governance Framework, the Board of Directors' Charter, and continued compliance with the Corporate Governance Code of the Kingdom of Bahrain as issued by the Central Bank of Bahrain's High-Level Controls Module (HC), Alba has approved and implemented this Whistleblowing Policy (the "**Policy**").

This Policy applies to all Board members, executive management, senior management, and employees of Aluminium Bahrain B.S.C. ("**Alba**"), regardless of employment classification (individually or collectively referred to as "**Alba Employees**"). In addition, the Policy extends to contractors, consultants, secondees, suppliers, vendors, customers, and other third parties who conduct business with Alba (referred to as "**Stakeholders**").

Alba upholds the highest standards of integrity, ethical behaviour and professional conduct in all aspects of its business. Alba is committed to the highest standards of good governance, openness, transparency, honesty, integrity, and accountability. The purpose of this Policy is to promote an environment where Stakeholders can, in good faith, raise concerns about misconduct or wrongdoing without fear of retaliation, victimisation, discrimination, or disadvantage.

This Policy is designed on the following principles:

- To reflect and protect the values of Alba, including integrity, transparency, accountability, and good governance.
- To ensure that all concerns and complaints raised under this Policy are treated fairly, objectively, and consistently.
- To guarantee that any individual raising concerns in good faith can do so without fear of retaliation, victimisation, or disadvantage, even if the concern is ultimately unfounded.
- To provide a transparent, confidential, and accessible process for raising and addressing concerns.
- To ensure that individuals making disclosures are entitled to anonymity, unless they agree otherwise or disclosure is required by law or regulation.
- To reinforce responsibility and accountability across the organisation, and to ensure adherence to Alba's Code of Conduct, governance framework, and corporate policies.

2. INTEGRITY LINE

Alba has in line with this Policy established a confidential reporting mechanism line called "**Integrity Line**" for the purposes of recording all reports and incidents in a secure and anonymous manner. The Integrity Line can be accessed via calling by phone or reporting online / www.alba.ethicspoint.com.

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

All reports made through the Integrity Line are automatically recorded in the system.

Reporters may also raise and communicate their concerns and incidents directly to any member of the Integrity Task Force (ITF) which comprise of the Chief Internal Auditor (Chairman of the Task Force), the Chief Supply Officer, the Chief Legal and Governance Officer, and the Risk Officer.

ITF members	Email
Chief Internal Auditor	khalid.turani@alba.com.bh
Chief Supply Officer	waleed.tamimi@alba.com.bh
Chief Legal and Governance Officer	s.abdulrahman@alba.com.bh
Risk Officer	mujtaba.alshaikh@alba.com.bh

3. REPORTING REQUIREMENTS

Alba Employees and Stakeholders are encouraged to make reports under this Policy whenever they become aware of, or reasonably suspect, illegal activities, misconduct, or wrongdoing that may adversely affect Alba. Reports should be made in good faith and in the best interests of Alba.

The aim of this Policy is to cover concerns that could have a material impact on Alba's operations, performance, financial standing, environment, or reputation. These concerns include, but are not limited to:

Type of Concern	Illustrative Examples
Illegal or Criminal Activities	Bribery, corruption, fraud, theft, blackmail, money laundering, slavery, human rights abuses, or any other breach of criminal law.
Regulatory or Policy Breaches	Non-compliance with laws, regulations, the CBB Rulebook, Alba's Code of Conduct.
Financial Misconduct	Fraud or suspected fraud, falsification of financial statements, misrepresentation of corporate information or data, improper accounting practices.
Unethical Conduct / Governance Failures	Misconduct, collusion, abuse of authority, conflicts of interest, aiding or abetting wrongdoing, or deliberate concealment of misconduct.

Asset Misuse or Misappropriation	Misuse or unauthorised use of Alba’s assets, funds, information, IT systems, intellectual property, or supplies.
Forgery or Document Manipulation	Forgery, alteration, or manipulation of physical or electronic documents, records, or computer files.
Harassment & Discrimination	Harassment, bullying, intimidation, or discriminatory practices of any kind.
Reputational Damage	Any act deliberately intended to harm Alba’s reputation, goodwill, or standing.
Other Unethical or Improper Conduct	Any conduct inconsistent with Alba’s values of integrity, transparency, and accountability, even if not expressly listed above.

For the avoidance of doubt, grievances of a personal or employment-related nature (such as disputes relating to terms and conditions of employment, promotions, or interpersonal conflicts) are not covered by this Policy and should instead be raised under Alba’s relevant internal policies and procedures.

4. INTEGRITY TASK FORCE

In line with the recommendation of the Board Audit and Risk Committee (“**BARMC**”) and as approved by the Board of Directors of Alba (“**Board**”), Alba has established a designated committee under the name of the Integrity Task Force (“**ITF**”).

The ITF shall be responsible for receiving, registering, retaining, and where applicable investigating, any concerns or complaints raised under this Policy, in accordance with its approved processes and procedures as set out under the Investigation Process and Procedure.

The ITF shall ensure that accurate and complete records are maintained of all concerns raised, the steps taken to address them, and their outcomes, in compliance with applicable laws, regulatory requirements, and Alba’s Corporate Governance Framework as approved by the Board from time to time.

The ITF shall submit quarterly reports to the BARMC covering the number and nature of concerns received, actions taken, and their status. The BARMC may, at its discretion and based on the materiality or risk of reported cases, provide consolidated reports to the Board, as required.

The ITF shall comprise of Chief Internal Auditor (Chairman of the Task Force), the Chief Supply Officer, the Chief Legal and Governance Officer and the Risk Officer, or such other members as may be approved by the Board from time to time.

The ITF shall operate independently of day-to-day management influence and shall report directly to the BARMC. The ITF's work shall be guided solely by the principles of transparency, objectivity, and integrity, ensuring that whistleblowing cases are reviewed and resolved without conflict of interest or undue pressure.

Alba Employees and Stakeholders must not attempt to investigate such concerns themselves, suppress the report, or discourage the reporting person from using the Integrity Line.

5. GENERAL GUIDELINES FOR ASSESSMENT OF INTEGRITY LINE REPORTS

The ITF shall assess all Integrity Line reports to determine whether an investigation is warranted. In carrying out this assessment, the ITF will follow a structured review process and apply its discretion in line with this Policy as outlined below:

Step 1: Relevance to the Policy

- If the subject matter of the report appears to relate to a breach of Alba's Code of Conduct, corporate policies, applicable laws or regulations, or falls within the scope of reportable concerns set out in this Policy, proceed to Step 2.
- If not, the ITF may close the case and respond that the matter falls outside the scope of the Integrity Line mandate and direct the reporter to the appropriate internal reporting channels.

Step 2: Sufficiency of Information

- If the report contains relevant and substantive evidence or information to enable review, proceed to Step 3.
- If not, the ITF may request additional information from the reporter. If no further information is provided within 15 calendar days of the request, the ITF may close the case.

Step 3 – Assessment for Investigation

- If, after review, the subject matter warrants a formal investigation, the ITF shall initiate such investigation in accordance with Alba's Investigation Process and Procedure policy.
- If not, the ITF may close the case and respond accordingly.

In exercising its discretion, the ITF may differentiate between **genuine reports** that require an appropriate response, and **spurious or false reports** that fall outside the intended purpose of the Integrity Line. In doing so, the ITF shall take into account factors such as:

- the nature and seriousness of the subject matter;
- whether substantially similar reports have been submitted repeatedly; and
- whether there are common indicators suggesting a hidden agenda behind the report.

Reports assessed as spurious may be dismissed with a response directing the reporter to the appropriate internal mechanisms, systems, or processes within Alba for resolution.

Genuine reports may fall into two categories:

- **Sufficient Information** – the report contains enough details to proceed with an investigation under this Policy and Alba’s Investigation Process and Procedure policy.
- **Insufficient Information** – where substantive details are lacking, the ITF may request further information from the reporter. If such information is not received within **15 calendar days**, the matter shall be deemed closed, and the reporter informed accordingly.

6. RESPONSE TIMELINE AND CLOSURE CRITERIA

- The ITF shall issue an initial response within 30 calendar days from the date of a report.
- Following the ITF’s final decision and response on any report, the reporter shall have 60 calendar days to submit comments or a response. After this period, the case will be deemed permanently closed.
- The ITF shall aim to close all reports within three (3) months, unless an ongoing investigation or exceptional circumstances require a longer period.

7. DISCIPLINARY AND LEGAL ACTION

Following a proper investigation, Alba may take disciplinary and/or legal action in cases where wrongdoing or misconduct is established.

Where warranted, Alba will cooperate fully with law enforcement or regulatory authorities, which may result in criminal prosecution of the offender(s).

Alba will also consider whether any misconduct resulted from failures of supervision or control; if so, disciplinary action may extend to those responsible for the oversight failure.

Notwithstanding the above, the ITF retains overriding discretion to take any actions it considers appropriate, beyond those specifically outlined in this Policy, based on its assessment of the nature and seriousness of each report.

8. LEARNING FROM EXPERIENCE

Where misconduct, fraud, or other wrongdoing has occurred, Alba will review and, where necessary, strengthen systems, controls, and procedures to reduce the likelihood of recurrence.

Lessons learned from whistleblowing cases will be used to promote continuous improvement in Alba’s governance, risk management, and compliance framework.

9. ROLE OF INTERNAL AUDIT

- Internal Audit is responsible for assisting the ITF in monitoring and developing Alba's Whistleblowing Policy and related processes.
- At the request of the ITF, Internal Audit may conduct or support independent investigations, ensuring objectivity and adherence to best practice standards.
- Internal Audit may also assist in training and awareness programs for employees on whistleblowing and integrity matters.
- Internal Audit will track the status of agreed actions resulting from investigation reports and provide periodic summary updates to the BARMC.

10. ROLES AND RESPONSIBILITIES

Alba Employees

- Employees will receive training on whistleblowing and the use of the Integrity Line, including how to report concerns and the protections available to whistleblowers.
- Employees are expected to comply with Alba's Code of Conduct and act with honesty, care, and diligence in the use of Alba's assets, funds, and resources.

Alba Employees must:

- Report any suspected fraud, misconduct, or questionable practices through the Integrity Line or other designated channels.
- Raise concerns with their Line Manager, Internal Audit, or the Integrity Task Force (ITF) where appropriate.
- Fully cooperate with the ITF, Internal Audit, or external authorities during any investigation.
- Employees must not engage in retaliation or victimisation of whistleblowers.

Alba Management

- The **CEO, Chief Officers, and Managers** are responsible for establishing and maintaining effective internal controls within their areas of accountability. These include:
 - Process-specific controls.
 - Management reviews.
 - Clear levels of authority and segregation of duties.
 - Job rotation and mandatory vacations, where applicable.

Alba Management must:

- Lead by example and reinforce Alba's zero-tolerance stance on misconduct and fraud.

- Ensure compliance with Alba's Code of Conduct, policies, and procedures within their teams.
- Promptly report any suspected misconduct or fraud to the Chief Internal Auditor the ITF and, where necessary, notify external authorities.
- Undertake role-appropriate whistleblowing training provided by Alba.
- Managers and supervisors must protect employees from retaliation when they raise concerns in good faith.

Stakeholders

- Stakeholders are expected to:
 - Conduct their dealings with Alba in compliance with applicable laws, regulations, and contractual obligations.
 - Adhere to Alba's **Code of Conduct** and any relevant contractual codes of ethics or compliance clauses.
 - Report, through the **Integrity Line** or directly to the **ITF**, any suspected illegal, unethical, or improper conduct connected with Alba's operations or business relationships.
- Third Parties who raise concerns in good faith are entitled to the same protections as Alba employees, including protection against retaliation, victimisation, or disadvantage.
- Alba reserves the right to take appropriate contractual or legal action against Third Parties who engage in misconduct, fraud, or unethical practices.

Board and BARMC

- The **Board of Directors** has ultimate responsibility for ensuring the effectiveness of Alba's whistleblowing framework.
- The **BARMC** is tasked with:
 - Overseeing the operation of the Integrity Line and the work of the ITF.
 - Receiving and reviewing periodic reports from the ITF on whistleblowing cases and outcomes.
 - Ensuring that whistleblowing cases are handled independently of management influence.
 - Escalating material cases to the full Board or regulators where appropriate.
- The Board shall ensure that Alba fosters a culture of transparency, openness, and accountability, where whistleblowing is encouraged and protected.

Any failure to escalate a report, any attempt to suppress or ignore a concern, or any retaliation against a reporting person shall itself be treated as serious misconduct under this Policy.

11. RECORD RETENTION

Records relating to any complaint, concern, or investigation shall be retained by **Alba** in accordance with its record retention policies as may be amended from time to time.

As These records may pertain to confidential matters, including anonymity and personal or sensitive data, access shall be strictly limited to the ITF and authorised persons, or disclosed only to a court of law or regulatory authority in the event of formal proceedings.

Whistleblowing records will be classified as “**Confidential**” and securely stored in accordance with Alba’s information security and data protection policies. These records shall also serve as evidence of Alba’s compliance with its corporate governance obligations.

12. OWNERSHIP AND REVIEW

The ultimate responsibility for this Policy rests with the Board, which provides oversight of its effectiveness and ensures alignment with Alba’s governance framework and regulatory requirements. Internal Audit is responsible for the day-to-day administration of the Policy, including monitoring its implementation, coordinating training and awareness, and reviewing its effectiveness in practice.

IA shall periodically review the Policy and recommend updates to reflect changes in law, regulation, or best practice, with any amendments subject to approval by the Board.

This Policy shall be published on Alba’s internal portal and made accessible to all Alba Employees and relevant Stakeholders.

This Policy, once approved by the Board, may only be modified or amended by resolution of the Board. Any questions of interpretation regarding the application of this Policy should be directed to the Chief Internal Auditor of Alba.