



# **Guide to Business Conduct**

Aluminium Bahrain BSC (c)

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## Message from the Chief Executive:

Dear Colleagues,

We are all proud of Alba's national and international reputation as one of, if not the, leading smelter in the Middle East, ranking amongst the top performers in the world and growing globally, manufacturing the very highest quality products in a safe and healthy environment.

The methods we employ to attain these results are as important as the results themselves. These include the knowledge, experience and talents of our employees, the wisdom of our strategy and the values that drive our behaviour.

In Alba, we believe in upholding the highest standards of ethical and professional behaviour in everything we do. We have therefore implemented the attached Code of Conduct as a document that outlines the conduct expected of our employees. This Code of Conduct relies on basic principles of honesty, fairness, equity, integrity and respect for people. These principles apply to all our business affairs and describe the behaviour expected of every employee. We should all promote trust, openness, teamwork, professionalism and pride in what we do. We will conduct our business in an ethical, professional, environmentally sustainable and socially responsible manner.

To accomplish these objectives, we need the loyalty and support of all our employees. The Guide to Business Conduct is intended to serve the individual employee as a set of basic guidelines designed to assist in avoiding actions that may reflect badly on the employee or on the organisation. Since it is impossible to make this an all-inclusive document, employees must use their judgement so that their conduct conforms to the intent and spirit sought in all matters including those not specifically mentioned herein.

Please also note that this Guide to Business Conduct is designed to supplement, not replace, the existing Alba personnel policy.

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

Thank you for your usual support and cooperation.

**Ahmed Saleh Al-Noaimi**  
Chief Executive Officer

## Introduction

This Code of Conduct applies to employees of Aluminium Bahrain (Alba). (BSC).

The intent of this document is to provide a set of guidelines to all employees in the conduct of their business and professional activities and when dealing with colleagues, vendors, customers, contractors, government agencies and the public. This document serves as a reminder to all Alba employees that it is important for all of us to uphold the highest standards of integrity and personal conduct in all matters that involve Alba.

Since we all aspire to make our work at Alba an example of integrity, we believe that those who are working with no integrity have no place at Alba. Therefore, any breaches or violations of these values are unacceptable and may result in disciplinary action against transgressors and on those who cover up or hide information against Alba interests. References to disciplinary action in this Code are to disciplinary action in accordance with locally applicable policies and laws; such action may extend to termination of employment in appropriate cases. In addition to such disciplinary action, you might be subject to legal action in case of any infraction of public law.

Upon joining Alba and while performing your duties, you must comply with this Code of Conduct.

# **1.Valuing All People**

## **1.1. Respect for Religious Beliefs**

Alba's policy is to respect the beliefs and religious practices of people of all faiths. It is, therefore, 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 will be considered a violation of the Bahraini law and Alba policy and will be subject to disciplinary action, including termination of employment.

## **1.2 Harassment**

Alba intends to provide a work environment that is pleasant, healthy, comfortable and free from intimidation, hostility or other offensive behaviours toward employees, contractors, vendors or customers. Sexual harassment of any sort, including verbal, physical or visual, is strictly prohibited. The making of false accusations and defamatory statements, whether verbal or written, of such harassment is also strictly prohibited. Any employee who engages in any act of harassment in the course of employment shall be subject to disciplinary action. If you believe that you may have been subjected to harassment, you should immediately report the occurrence to the Personal Superintendent. All complaints will be treated in strict confidentiality and will be promptly investigated.

## **1.3 Rights of the Individual**

### **(a) Good Working Environment**

Alba endeavours to provide a safe, healthy, pleasant and supportive working environment for all its employees.

### **(b) Employee Indemnification**

Alba will indemnify you and hold you harmless, whether you are a current or former employee, if, in the performance of your duties or acting at Alba's request, you are made a party to any civil, criminal or administrative action brought against you and/or Alba. In such a situation, we will pay any costs or expenses reasonably incurred and any amounts paid to settle any action or judgement actually and reasonably incurred by you in connection with the investigation, defence or appeal of such proceedings, provided:

- 1) You acted in good faith and honestly believed such actions to be in Alba's interests;
- 2) In the case of a criminal or administrative action or proceeding that is enforced by a monetary penalty, you had reasonable grounds for believing that your actions were lawful;
- 3) You promptly notify us of the initiation of such proceedings;
- 4) You positively participate in the defence;
- 5) You allow us to participate in your defence; and
- 6) You obtain our prior written approval before making any settlement in the proceedings.

### **(c) Equal Employment 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.

### **(d) Fair Treatment (Advancement, Development, Discipline)**

Our employees are valuable to the future of Alba and 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 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 endeavours to provide an environment for improving your qualifications, abilities and skills compatible with your employment position and responsibilities, as well as Alba's policies, rules, regulations 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 Personnel Section. 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 the disciplinary code of the personnel policy. You are advised to refer to the personnel policy and to contact the Personal Section for any additional information.

### **(e) Participation**

You are encouraged to offer your suggestions and ideas for improving our products and services, systems, policies and procedures.

## **2. Safety, Health and Environment (SHE) Policy and Commitment.**

A good performance in Safety, Health and Environment (SHE) has tangible and intangible benefits by way of protecting our environment and caring for the welfare of our employees and contractors. Our goals in this regard are to achieve zero injuries and illnesses and to ensure the protection of the environment wherever we conduct our business. Furthermore, off-the-job safety of our employees is just as important as safety on the job.

Strict compliance with applicable SHE policies and standards is an ethical and professional value of Alba. We aim to conduct our business in a safe, healthy and environmentally acceptable manner, so you should strictly adhere to Alba's SHE policy, standards and procedures. All SHE principles, procedures and practices established and documented in the Alba SHE Management System documents must be followed and implemented at all times.

## **3. Good Citizenship and Social Responsibility**

### **3.1 Respect for the Law**

You are required to obey all local laws and regulations. We endeavour to maintain appropriate levels of legal awareness to protect Alba's interests and those of our employees by anticipating the legal requirements that may arise from new laws and regulations, new business endeavours or modifications of existing business arrangements. The responsibility of every one of us is to report any occurrences or circumstances that may have legal implications for Alba.

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

### **3.2 Substance Abuse**

We are committed to providing a safe, healthy, productive and comfortable working environment. Accordingly, you are expected to be in suitable mental and physical condition while at work for effective and safe performance of your duties.

Whenever use or abuse of any mood-altering substance (such as alcohol, non-prescription or illegal drugs) interferes with a safe workplace, appropriate action will be taken. The possession or use of mood-altering, non-prescription substances at the workplace, or coming to work under the influence of such

substances, is strictly prohibited, is considered a violation of safe work practices and will be subject to disciplinary action.

Use, possession, transportation or sale of any illegal drugs or other mood-altering, non-prescription substances on Alba-owned or leased business premises is strictly prohibited. We reserve the right, in accordance with the law, to search all persons and their personal effects at any time on Alba property or upon entering Alba premises for any of those items, and to require employees to submit to medical evaluation or testing where cause exists to suspect use of illegal substance.

### **3.3 Social and Political Relations**

We recognise that we have an important role to play in the welfare of the society and that we have a responsibility to communicate, participate and cooperate with local authorities and with 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 the society and Alba, but also to ensure that they do not appear to be acting as spokespeople for Alba unless they have a prior permission from Alba.

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

You have the right to voluntarily participate in the political process. No one at Alba may require you to contribute to, support or oppose any political group or candidate. You may not, however, work on a political campaign actively during official working hours on Alba-owned or leased property or by using Alba-owned or leased assets such as computers, printers, photocopies, electronic mail and other such assets.

## **4. Ethical Business Conduct**

### **4.1 Business Ethics**

Our reputation and the trust and confidence of those with whom we deal, are among our most vital corporate resources. We are committed to conducting our affairs in a uniformly ethical manner and pursuant to a standard of fundamental honesty and fair dealing. This standard requires adherence to all laws, regulations and normal ethical practices that apply to our business activities, including adherence to official working hours and appropriate business attire. We expect all employees to act with the utmost integrity and to report violation of laws or policies to your immediate supervisor. You should obey all lawful instructions given by Alba or by any person duly authorised to do so.

## 4.2 Conflict of Interest

We all have a responsibility always to work in Alba's best interests and therefore must avoid situations and actions that may constitute or create the appearance of constituting a conflict of interest with those of Alba without first having declared your personal interest. Conflicts of interest are often difficult to identify in the early stages and can arise during the course of performing the regular business. Nevertheless, it is your responsibility to seek guidance from your supervisor if a conflict of interest exists or even the chance of one arising or appearing to arise.

The simple acts of disclosing the possibility of a conflict of interest and abiding by the instructions of your supervisor in that respect release you of the risk of losing the trust placed in you to act in Alba's best interests.

Therefore, you are urged to discuss any potential conflict of interest with your supervisor immediately when a potential conflicting circumstance arises. It is always better to look for any such possibility and disclose the same to your supervisor rather than losing Alba's trust at a later stage.

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

- Knowingly holding, or having a relative such as a spouse, sibling, parent, child, uncle, aunt, nephew, niece, grandparent, grandchild or parent- or sibling-in-law who holds a substantial financial interest in any enterprise with which ALBA has business dealings (e.g. suppliers, contractors, vendors, customers and licensees);
- Knowingly holding, or having such a relative who holds, a substantial financial interest in any enterprise in which ALBA has an investment;
- Accepting, directly or indirectly, from any vendor or supplier of services any vacations, cash payment, service, loan (except from financial institutions) or discount (except those offered generally to ALBA employees) or other items reasonably seen to be inducements by you or any of your relatives of the first or second degree.
- 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 job-related know-how) for the benefit of other business or personal interests; and
- 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.

### **4.3 Bribery and Corruption**

Corruption is any abuse of an official position for personal gain. Bribery is a form of corruption. You should, therefore, not offer or ask for any sort of bribe, whatsoever, and not allow any third parties acting on behalf of alba to do so, and you should not accept any gifts, bribe or anything of value, whether directly or indirectly from any person in order to influence official acts and decisions or to obtain or maintain any privilege to any company or person.

### **4.4 Gifts and Entertainment**

In principle, there is nothing wrong with receiving or giving gifts of appreciation of nominal value and of a promotional nature endorsed with a corporate logo such as calendars, diaries, pen sets and calculators.

Accordingly, if any gift valued at over BD 50 or the local currency equivalent or any lesser amount stipulated in your local policy, is offered to you by any person, you must declare the same to your supervisor.

You are prohibited from offering any gift to anyone employed by 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 violates the regulations issued by Alba or the laws governing the recipient.

### **4.5 Outside Employment**

Generally, Alba's employment contracts prohibit employment of its employees at any other organization, except pro bono work at registered charitable organisations. Accordingly we will strictly enforce this provision and any employee who violates this prohibition will be subject to disciplinary action, including termination of employment.

### **4.6 Preventing Fraud and Theft (Also reference Alba Fraud Policy in Appendix (a))**

Fraud and theft are violations of the law and of this Code of Conduct. Types of fraud and theft include but are not limited to:

- Falsifying contractual issues such as receipts, charges, quantities, quality, etc;
- Falsifying qualifications and experience;
- Misappropriation of funds;
- Deliberate misinterpretation of information;

- Unauthorised use of contractor manpower, vehicles and equipment;and
- Misuse of budget funding, including petty cash, vouchers etc.

You should seek advice from your supervisor before entering into an activity that could be construed as fraud or theft.

## **5. Confidentiality**

### **5.1 Information and Knowledge Management**

We are very much aware of the need to control the flow of data, information and knowledge from within Alba and to protect and maintain the knowledge that currently resides here. Deliberate misuse by you of Alba's knowledge for personal gain or for the benefit of a competitor is a serious breach of your contract and shall be subject to disciplinary action. Accordingly, when sharing information with those outside Alba, it is imperative that you obtain prior authorisation to do so from your supervisor or the company's management.

### **5.2 Requests for Employee Information**

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 about other employees, such as personnel, medical and other records, to the Personnel Section. Any employee who reveals or releases information about a current or former employee without specific authorisation, will be subject to disciplinary action.

### **5.3 Representing or Speaking on Behalf of Alba**

Alba's interest is to develop a positive relationship with members of the media, government officials, community leaders and business partners. 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.

## **5.4 Information Technology – Privacy, Security and Copyrights**

We use modern information technology systems to facilitate our work. In giving employees and authorised contractors access to this technology, we also expect personnel to be responsible in its use. You must be careful not to be involved in unauthorised actions such as:

- Accessing or attempting to access data, files or directories of others on their PCs or directories;
- Violating ALBA computer users' policies;
- Tampering with software or hardware;
- Illegal copying of copyrighted software;
- Illegal photocopying of copyrighted documents;
- Releasing of confidential data or sharing of confidential information with others;
- Attempting to intrude or hack into ALBA's computers or PCs; and
- Unauthorised use or disclosure of user ID's and passwords.

You should be aware that ALBA may monitor computer use, including email, to verify compliance with its computer users' policies. Any violations will be subject to disciplinary action.

## **5.5 Confidential Information**

Many of our employees have been placed in positions of trust or confidence because of the work they perform and therefore are exposed to or have access to ALBA funds, employee payroll data, personnel records, employee billing records, vendor and service contracts, operational data, licence agreements, computerised information, financial information and other types of sensitive information that is considered confidential or personal in nature.

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 to unauthorised persons or tampering with or altering ALBA records and/or property is a violation of that trust and may result in disciplinary or legal action, including termination of employment. 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 supervisor. Former employees shall not release any information without prior written approval from ALBA.

## **APPENDIX (a) ALBA FRAUD POLICY**

### **1. Introduction**

- Alba requires all employees at all times to act honestly and with integrity, and to safeguard those of Alba's assets, reputation and resources for which they are responsible.
- Fraud is an ever-present threat to these assets and resources and should be something, which all members of staff help to eliminate.
- Alba views fraud as an extremely serious matter and is committed to the promotion of an anti-fraud culture throughout the organisation. To this end, Alba has developed the following fraud policy explaining the company and staff responsibilities in relation to both prevention and detection of fraud.
- As part of this policy, Alba has also introduced a confidential reporting line Called "Integrity Line" which employees and third parties with whom Alba conducts business are encouraged to use.

### **2. Definitions - What is Fraud**

In Bahraini law the offence of fraud is defined under section 391 of the Bahrain Penal Code as "acquiring movable property or document or signing, cancelling, destroying or amending such document by the use of fraudulent means, or assuming a false name or capacity or disposing of real or movable property without being its owner or having the right to dispose of"

Some examples of Fraud (this list is not meant to be all inclusive):

- misappropriation (theft) or wilful destruction or loss of assets including cash;
- deliberate misapplication of accounting or other regulations or policies;
- manipulation, falsification or alteration of records or documents;
- suppression or omission of the effects of transactions from records or documents;
- recording of transactions without substance; and
- bribery and corruption.
- Failure to comply with a legal obligation
- Supply contract abuse
- Fabrication of contracts or records
- Attempts to conceal any of the above

### **3. Fraud Reporting & Follow up**

Guidance on the contents of the fraud reporting (proven or suspected) should The contents of any report should establish the following facts

- The amount/value in question
- The period over which the irregularity occurred, if known
- The date of discovery and how the suspected fraud was discovered
- The type of irregularity and what led to it (e.g.):
  - Was there a breakdown in the systems of internal control, or
  - Is there any inherent weakness in the system of internal control, which allowed it to occur?
- Whether the person responsible has been identified
- Whether any collusion with others is suspected
- Any other information or comments which might be useful

### **4. Responsibilities**

The objective of this policy is to undertake fraud investigations whenever a fraud is reported or suspected. In order to ensure proper application and effectiveness of these policies, the following responsibilities have been assigned to the Integrity Task Force.

#### **(i) Integrity Task Force (ITF)**

- The ITF is comprised of the GM Business Development And Risk Management, Manager of HR, Manager of Internal Audit and Legal Advisor.
- The ITF is responsible for oversight of any reported or suspected fraud.
- Frauds reported to the ITF will be reviewed and if deemed significant will also be reported to the 'Audit Committee' on a periodic basis.
- The ITF will also submit an annual 'Fraud Report' to the Audit Committee containing details of all activity in relation to fraud, including an analysis of frauds discovered and action taken, policy developments and amendments, training activities and an analysis of control effectiveness.

## **(ii) Alba Management**

- The CEO, Deputy CEO and General Managers are responsible for implementing and monitoring the Fraud Policy in their respective areas.
- All levels of Management (CEO, Deputy CEO, GM, Managers and Supervisors) will be provided training by Alba to ensure they understand how to implement the Fraud Policy.

## **(iii) Internal Audit**

- Internal Audit is responsible for assisting the ITF in monitoring and developing overall ALBA fraud policies.
- Internal Audit will be provided training by Alba to ensure they understand how to support the implementation of the Fraud Policy

## **(iv) All Alba Employees**

- All Alba employees will be provided the training by Alba to ensure they understand the Fraud Policy
- All Alba employees are responsible for acting with honesty, care and diligence, in the use of Alba's assets and resources and the handling and use of Alba's funds whether they are involved with cash or payments systems, with receipts, or dealing with suppliers.
- Employees should not accept gifts value exceeding BD 50, hospitality or benefits of any kind from a third party, which might be seen to compromise their integrity. If an employee receives a gift that is believed to be greater than BD 50 in value they should report the gift to their immediate supervisor.
- Staff should be alert to the possibility that unusual events or transactions could be indicators of fraud.
- Employees should report details immediately through the appropriate channel if they suspect that a fraud has been committed or see any suspicious acts or events.
- Employees should co-operate fully with whoever is conducting internal checks, reviews or fraud investigations.
- Staff must use Alba's fraud reporting systems such as the Integrity Line and should raise concerns with any of the following: their Line Manager/ Internal Audit or ITF.

## **5. Disciplinary / Legal Action**

- After proper investigation, Alba may take legal and/or disciplinary action in cases where it is deemed appropriate. This could involve the involvement of police depending upon the nature of the fraud. There will be consistent handling of cases without regard to position or length of service.
- Alba will co-operate fully with any police enquiries which could result in the offender(s) being prosecuted.
- Alba will also consider whether there has been any failure of supervision. Where this has occurred disciplinary action may be taken against those responsible.

## **6. Learning from Experience**

- Where a fraud has occurred, Alba will make any necessary changes to systems and procedures to ensure that similar frauds do not recur.
- The investigation may have pointed up where there has been a failure of supervision, a breakdown in, or an absence of, control. Such identified failures will be acted on.

## **7. Alba Integrity Line Policy**

- 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, when they are about unlawful conduct and financial malpractice, it can be difficult to know what to do.
- As staff may be worried about raising such concerns, Alba has introduced an Integrity Line to enable staff to raise concerns about malpractice at an early stage and in the correct manner.
- This procedure is primarily for concerns where the interest of Alba as a company is at risk. It is not designed to question financial or business decisions taken by management, nor should it be used to raise emergency safety or security issues – these should be reported immediately under other Alba internal safety procedures.
- The integrity reporting facility applies not only to all permanent and short term employees of Alba, but also to external consultants, contractors and agency staff working within Alba.
- It should be noted that this reporting facility is designed to operate on a confidential basis, if required by the reporting person. Alba staff should feel free to raise appropriate concerns without fear of recrimination if these concerns transpire to be unproven.

## 8. Management Assurances To All Alba Staff

- The CEO, Deputy CEO, General Managers and levels of Alba management are committed to this policy including the Integrity Line.
- If an Alba staff raises a genuine concern of suspected fraud, he or she will not be risking losing their job or suffering any form of retribution as a result. Provided that Alba employees are acting in good faith, it does not matter if ultimately the concern is unfounded. This assurance is not extended to someone who maliciously raises a matter they know is untrue or to someone who chooses to make disclosures outside the scope of the procedures set out in this policy.
- Alba will not tolerate the harassment or victimization of anyone raising a genuine concern. However, management recognises that staff may nonetheless want to raise a concern in confidence under this policy. The reporting person's identity will be kept in confidence and will not be disclosed without his consent.
- Once a concern has been raised, Alba senior management will consider initially what action should be taken. It may involve a more formal investigation. However, any subsequent steps will be communicated to the person who has reported the concern, who will be handling the matter and whether further assistance may be required. If the reporting person has any personal interest in the matter, it is important that this is communicated at the start of the process.
- While the purpose of this fraud policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, management will give the reporting person as much feedback as it can. If requested, management will confirm its response in writing. Please note, however, that it may not be able to describe the precise action taken when this might infringe in a confidence to another person.
- The Audit Committee will review and monitor the Alba fraud policy periodically, including an assessment of its effectiveness. Changes to the policy will be notified to employees when they occur.

## 9. Conclusion

Whilst the circumstances of individual frauds will vary, it is important that all are vigorously and promptly investigated and that appropriate action is taken. To repeat, Alba views fraud extremely seriously and all suspicion of fraud will be acted upon in accordance with this policy. Proven fraud can result in immediate termination and/or legal action where deemed appropriate by Alba management.