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Document Number



# LOC-GDE-HR-078

Document Title

## Business Working Principles Guide



Document Owner      Lesley Dow

Document Approver    Tom Uppington

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## 1 PURPOSE AND SCOPE

ALVANCE British Aluminium is committed to all its employees and partners (including its subcontractors and suppliers) to comply with the highest ethical standards, with the applicable laws, and with the best practices for carrying out its commercial activities in a sustainable way. This Working Principles as well as the regulations, standards and related policies apply to all employees, employees, and partners as well as any persons engaged in any capacity by ALVANCE British Aluminium.

This Working Principles complements our Health, Safety, Environment and Quality Policy (LOC-POL-HSEQ-001), procurement procedures and corresponding terms and conditions, Code of Conduct and all the legal and other requirements element and requirements applicable to ALVANCE British Aluminium.

Our Working Principles builds on the values of GFG Alliance: *Family, Sustainability, and Change*.

## 2 RESPONSIBILITIES

ALVANCE British Aluminium is responsible for making this Working Principles available and for updating it in case of any changes.

All directors, managers, and employees of ALVANCE British Aluminium are responsible for reading, understanding, and upholding the letter and the spirit of this Working Principles and the associated principles. We expect our suppliers, contractors, and any other partner that interacts with ALVANCE British Aluminium to conduct activities in compliance with the standards prescribed in our Working Principles.

Every employee is required to act responsibly with integrity and honesty, complying with all applicable laws, regulations, and company policies.



## 3 VIOLATIONS OF THE CODE – SANCTIONS

Compliance with this Code is essential to the reputation and success of ALVANCE British Aluminium. Employees must report any suspected misconduct, illegal activity, fraud, and violations of the Working Principles and ethical standards.

Any direct or indirect violation of the Working Principles and applicable laws, regulations, or policies; any act of vandalism, damage or theft; any manifest abuse of authority; any behaviour or act of sexual or moral harassment; any physical or verbal assault compromising the integrity, respect and dignity of the person; any breach of the work instructions as well as anything that could disturb the order, the discipline or the safety of persons are liable to sanctions up to and including termination of employment. In addition, certain violations may result in legal sanctions.

If you suspect or know of a decision or action that seems incompatible with this Working Principles, unsafe, unethical, or potentially harmful you should it report immediately. If you have a question, need help, or want to raise a concern you can address it with your line manager or escalate it to ALVANCE British Aluminium Senior Management. Depending on the subject, you can also send your question or concern to one of the following people:

- For any incident of Fraud or Corruption: contact the Managing Director
- For any harassment incident: contact the Human Resource Manager

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## 4 LEGAL AND ETHICAL PRACTICES

### 4.1 Compliance with laws

All employees of ALVANCE British Aluminium are required to comply with all applicable laws and regulations, particularly in the areas described below.

### 4.2 Fight against fraud, corruption, and conflicts of interest

ALVANCE British Aluminium assigns particular importance to compliance with the laws and regulations related to compliance with business ethics and the fight against corruption.

The Company, our employees, contractors, and business party are prohibited to, directly or indirectly, promise, offer, pay, solicit or accept any type of payment or retribution in the form of money, privilege, service or any other element of value with the intention of corruptly influencing business decisions.

The policy prohibits ALVANCE British Aluminium to accept gifts or invitations, unless they are of minimal value (less than 100 pounds £'s in value) and offered without creating conflicts of interest/ Employees receiving gifts in the abovementioned circumstances must declare and seek approval of their line manager.

For further information, please refer to the Anti Bribery and Corruption training

### 4.3 Respect for Human Rights and Labour Law

ALVANCE British Aluminium supports and respects the protection of human rights and the fundamental principles of labour law as defined by the United Nations in the Universal Declaration of Human Rights and by the International Labour Organization.

Employees, contractors, and business partners are prohibited to act in a way that directly or indirectly violates these principles.

ALVANCE British Aluminium encourages freedom of association and does not accept any form of forced or compulsory labour, or the use of child labour in any form and in particular the worst forms of child labour such as hazardous work which could harm the health, safety and morale of children. ALVANCE British Aluminium respects the minimum age required to work according to the national and international laws in force.

### 4.4 Non-Discrimination, Harassment, Violence

ALVANCE British Aluminium speaks out clearly against discrimination, harassment and violence and does not accept any form from it by its employees, contractors, and business partners.

Employees are recruited and considered based on their skills and merits for the position. All our work-related decisions are based on merit.



All employees of ALVANCE British Aluminium benefit from the respect of their rights and from a harmonious work environment, free from intimidation, discrimination, or any kind of coercion.

Acts of violence, threats, harassment, humiliation, or exclusion are prohibited and subject to sanctions. The use of offensive or abusive language at work is not allowed.

Discrimination on the grounds of gender, race, colour, body weight, physical appearance, HIV situation, national or social origin, religion, disability, political affiliation, sexual orientation, family situation, family responsibilities, age or any other condition that could give rise to discrimination under ILO conventions is prohibited.

Bullying, discriminating conduct, sexual harassment, unwelcome sexual advances or other inappropriate personal conduct creating an intimidating, hostile, or offensive working environment are also prohibited. Such conduct is unacceptable and will not be tolerated, and their possible authors will be sanctioned in accordance with relevant laws and regulations.

For further information, please refer to the Equality Act training and Equality, Diversity and Inclusion Policy

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## 5 5 HEALTH, SAFETY AND ENVIRONMENT

### 5.1 Health, Safety, and well-being at work

ALVANCE British Aluminium strives to provide healthy and safe working conditions to all employees and contractors. We prioritize the prevention of the risk of accident or occupational disease. It requires everyone to perform their work safely, to know the emergency procedures that apply to the area where they work, to stop work if considered unsafe, to speak up unsafe or unhealthy working environment, to report any accident, injury, illness, or unsafe conditions immediately, and to comply in general with all applicable health and safety regulations.

All employees and contractors must comply with the safety instructions and use the required personal protective equipment (PPE) in accordance with their work area.

### 5.2 Drugs and Alcohol

It is forbidden to introduce, distribute, and consume drugs or alcohol within the premises of ALVANCE British Aluminium. Unannounced tests can be carried out at any time. All employees must behave responsibly regarding smoking or vaping at work during their professional activities. In accordance with anti-tobacco legislation, smoking and vaping are strictly prohibited outside of smoking shelters.

### 5.3 Environment

The objective of ALVANCE British Aluminium is to achieve a high level of environmental protection, respecting all applicable regulations and seeking continuous performance improvement and considering the best available practices and the expectations of communities where we operate. We strongly focus on preventing waste and optimizing the consumption of natural resources, in particular the use of water. ALVANCE British Aluminium is committed to sustainable development and works with the objective of carbon neutrality and the optimal recovery of industrial waste.

ALVANCE British Aluminium strives to offset the effect of climate change by reducing its greenhouse gas emissions. All employees, contractors, and business partners are expected to respect the principles and instructions regarding environmental protection and must be aware of their environmental responsibilities.

## 6 USE OF COMPANY PROPERTY, ASSETS & RESOURCES



Access to and use of ALVANCE British Aluminium's communication and information systems, including but not limited to cell phones, messaging, Intranet, Internet, email, and other devices, are subject to acceptance and adherence of our Policy for the Use of Computer Resources and the Security Policy for Computer Systems (

For further information, please refer to Social Media Policy

Any fraudulent removal of assets belonging to ALVANCE British Aluminium or to a company operating on the site is liable to disciplinary action and the corresponding legal proceedings.

All employees are responsible to protect the assets and resources (including information and data) belonging to ALVANCE British Aluminium under their control. Confidential information must not be shared in public forums or social media.

All financial transactions must be recorded in accordance with applicable accounting standards, and specific statutory and regulatory requirements applicable to our business. Accounting documents must be accurate and complete, and must not contain any false, misleading, or artificial entry. All transactions must be properly authorized, recorded, and reported.

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## 7 CONFIDENTIALITY AND INTELLECTUEL PROPERTY

Intellectual property is a very precious asset for ALVANCE British Aluminium. All employees, contractors, and business partners must protect our intellectual property and must respect and protect the confidentiality and intellectual property of others.

Most information is protected and must remain confidential such as documents protected by copyright and personal data in accordance with the principles of the General Data Protection Regulation (GDPR) and any other applicable principle of confidentiality.

Employees, contractors, visitors, and external personnel working at the site of ALVANCE British Aluminium in any capacity are required to keep the most absolute discretion and professional confidentiality for all matters relating to manufacturing processes and, from a in general, on all operations of which they are aware in the exercise of their functions.

The employees of ALVANCE British Aluminium are required to ensure that this obligation is observed by the visitors, contractors for whom they are responsible.

For further information, please refer to Privacy Policy.

## 8 EXTERNAL RELATIONS

### 8.1 Relations with the authorities

ALVANCE British Aluminium maintains constructive cooperation with authorities and regulatory bodies, both locally and internationally. ALVANCE British Aluminium strives to meet the needs of local communities whenever possible.

### 8.2 Contribution to political activities

To maintain its impartiality, ALVANCE British Aluminium does not contribute funds or resources to a support any political party or candidate.

### 8.3 Publication and external communication

Any publication or external communication related to ALVANCE British Aluminium activities must be approved in advance according to Communication and Consultation Procedure (LOC-ELM-HSEQ-009).

### 8.4 Reference

[https://www.ohchr.org/documents/publications/faq\\_principlesbusinesshr.pdf](https://www.ohchr.org/documents/publications/faq_principlesbusinesshr.pdf)

UN Guiding Principles for Business and Human Rights: Protect, Respect and Remedy