Document Number

LOC-GDE-HR-012

Document Title

Alvance Code of Conduct

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Revision History					
Rev	**Doc Status**	**Revision Comments**	**Created by**	**Approved by**	**Issue Date**
1.0	Issued	New Document	Maciej Oledzki	Lesley Shearer	20/05/2026

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1 Purpose and Scope

The Company is committed to conducting its activities in a safe, lawful, ethical and sustainable manner. This Code of Conduct sets out the principles and standards of behaviour expected from all employees and those working on behalf of the Company.

This Code applies to all Company employees.

This Code should be read in conjunction with all applicable Company policies, procedures, site rules and legal requirements. It supports the values of GFG Alliance: Family, Sustainability and Change.

2 Responsibilities

All employees are responsible for reading and upholding both the letter and the spirit of this Code.

Every individual is expected to:

- act with integrity, honesty and professionalism
- comply with applicable laws, regulations, Company policies and site rules
- treat others with dignity and respect
- carry out work safely and responsibly
- raise concerns where conduct is unsafe, unlawful, unethical or inconsistent with this Code

Managers and leaders have additional responsibilities to lead by example, promote a respectful, safe and inclusive working environment, ensure that this Code and related Company policies are communicated and understood, address concerns promptly, escalate issues appropriately, and apply Company rules and procedures fairly and consistently.

3 Violations of the Code

Compliance with this Code is essential to the reputation and safety of the Company.

Any breach of this Code may result in action being taken under the relevant Company procedure. Depending on the seriousness, this may include disciplinary action up to and including dismissal, removal from site, and where appropriate referral to external authorities.

Examples of conduct that may be treated as gross misconduct include but are not limited to deliberate safety violations, fraud, theft, bribery, violence, harassment, falsification of records, serious misuse of authority, or conduct likely to damage the Company's reputation or lawful operations. This approach is consistent with the need for clear standards and fair disciplinary handling under ACAS guidance.

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4 Legal and Ethical Practices

4.1 Compliance with laws

All employees are required to comply with all applicable laws, regulations and Company policies.

4.2 Fraud, bribery, corruption and conflicts of interest

No employee may directly or indirectly offer, promise, give, request or accept any payment, gift, favour, service or other benefit intended to improperly influence a business decision or secure an unfair advantage.

Actual, potential or perceived conflicts of interest must be declared promptly. No one may use their position for personal gain or to improperly benefit relatives, friends or third parties.

Any gifts or hospitality must not create, or appear to create, an improper obligation or conflict.

4.3 Human rights and labour standards

The Company is committed to respecting human rights and the fundamental principles of labour law, including forced labour, compulsory labour, child labour, exploitation or abusive working practices in any part of its business activities or supply chain. We expect employees to respect and follow these principles at all times. This includes a commitment to prevent modern slavery and human trafficking in our operations and, so far as reasonably possible, in our supply chain.

4.4 Dignity at work: non-discrimination, harassment and violence

We are committed to a workplace free from discrimination, harassment, bullying, intimidation and violence.

Employees must treat one another with respect and must not engage in abusive, threatening, humiliating or offensive behaviour. Employment-related decisions must be based on merit, competence and lawful criteria.

The Company prohibits discrimination, harassment and victimisation related to any protected characteristic under the Equality Act 2010, as well as bullying and other inappropriate conduct.

The Company will take reasonable steps to prevent sexual harassment, including harassment by colleagues, contractors, customers, visitors and other third parties. Discrimination, harassment, sexual harassment, bullying, victimisation, threats and acts of violence are unacceptable and will not be tolerated. Any concerns should be raised promptly so that they can be addressed under the appropriate Company procedure.

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5 Health, Safety and Environment

5.1 Health, safety and wellbeing at work

We provide healthy and safe working conditions for all employees, contractors and visitors. As we are a top tier COMAH site, everyone is expected to work safely, follow site rules and comply with all relevant health and safety procedures.

This includes the requirement to:

- follow all safety rules, procedures, permits and work instructions
- wear required personal protective equipment
- attend required inductions, briefings and trainings
- stop work where conditions are unsafe
- report accidents, incidents, near misses, hazards and unsafe conditions immediately
- cooperate with investigations and corrective actions

5.2 Drugs and alcohol

The Company aims to provide a safe, efficient, and effective service to all its customers and will take any action the Company deems to be appropriate to ensure that employees who may attempt to work whilst impaired due to the use of substances do not compromise this.

The Company ensures that the use of substances by any employee or any other person(s) associated with the Company does not impair the safe and efficient running of the Company or put at risk the health, safety or welfare of its employees, customers, suppliers, or members of the public.

The Company is aware that in some instances, substance dependency can be defined as an illness. The Company actively encourages any employee who may have or who is developing a dependency to seek its help. When appropriate, the Company will help in seeking relevant and evidence-based treatment. In these cases, normal sickness absence procedures will apply. Confidentiality is assured in these cases.

6 Use of Company Property, Assets and Resources

All employees and those working on behalf of the Company are responsible for protecting Company property, materials, equipment, systems, information and other resources under their control.

Company assets must only be used for legitimate business purposes and must not be stolen, damaged, misused, removed without authority or used in a way that places the Company at risk.

All business records, production records, safety records, timesheets, expenses and financial records must be accurate, complete and properly maintained.

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7 Confidentiality, Data Protection And Intellectual Property

Employees must protect confidential information, personal data and intellectual property belonging to the Company and others.

Information acquired through work must not be disclosed without proper authority. This includes commercial information, manufacturing processes, personal data, business records and any other confidential material.

All use of communication systems, information systems, email, internet and social media must comply with Company policies and security requirements.

8 Speaking Up and Reporting Concerns

Employees of the Company must report suspected misconduct, illegal activity, unsafe behaviour, fraud, corruption, harassment, breaches of this Code or any other serious concern.

Concerns should normally be raised with the line manager, senior management or Human Resources, depending on the subject matter.

Personal complaints relating to an individual's own employment should normally be raised under the grievance procedure.

Concerns about wrongdoing, risk, illegality or misconduct affecting others or the wider public interest should be raised under the whistleblowing procedure.

Reports made in good faith will be treated seriously. Retaliation, victimisation or detriment against anyone who raises a concern, supports an investigation, provides evidence, or refuses to participate in wrongdoing will not be tolerated.

9 External Relations

We maintain constructive relations with authorities, regulators, communities and other stakeholders.

Communicating with external parties is the responsibility of the Managing Director, Department Managers, HSEQ Manager, and HR. Each of these persons has a different area of responsibility regarding external communications. Please refer to LOC-ELM-HSEQ-009 – *Communication and Consultation* for more information.

To maintain impartiality, Company funds or resources must not be used to support political parties or candidates unless expressly authorised and lawful.

10 Review and Related Documents

This Code will be reviewed annually and updated as required.

It should be read alongside all relevant Company policies and procedures, including those relating to:

- health and safety
- equality, diversity and dignity at work
- disciplinary and grievance procedures
- whistleblowing
- anti-bribery and corruption
- drugs and alcohol
- IT and communications
- confidentiality, privacy and data protection
- environmental management

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