

# Code of Conduct



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“Compliance with the Code is mandatory. Qatalum will make no compromises when it comes to Integrity.”

## MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

**Dear Colleague,**

From the time His Highness Sheikh Tamim bin Hamad Al-Thani laid the plant's foundation stone, Qatar Aluminium Limited has strived to act responsibly and contribute to Qatar National Vision 2030.

From these proud beginnings, Qatalum has grown into one of the world's best smelters, producing high quality aluminium products in a safe and responsible manner. Operating in a highly competitive global environment, the demands on Qatalum as a company and as a member of Qatari society are always increasing. Qatalum must ensure it has the trust of its employees, customers, suppliers, shareholders and the general public. In order to maintain and grow that trust, Qatalum must always uphold the highest standards of ethical behavior.

Qatalum's Code of Conduct outlines the behaviour expected from all of us, you and me, without exception. While the Code cannot give detailed instructions for all possible situations, it sets out the necessary principles to apply to our work using our good judgment.

Employees should read the Code regularly and seek help from a supervisor or manager if any assistance is needed.

The Code of Conduct has been approved by the Board of Directors. Compliance with the Code is mandatory. Qatalum will make no compromises when it comes to Integrity.

**Khalid Mohamed Laram**  
Chief Executive Officer



## 1. INTRODUCTION

The Code of Conduct (the “Code”) provides a set of expectations and guidelines to all those working for Qatalum. It enshrines our key values of Respect, Proactivity, Enthusiasm and Integrity. We must 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 departments and the general public.

By working at Qatalum, you agree to comply with the Code and always strive to exercise good judgment, care and consideration in everything you do for the Company. Violation of the Code will not be tolerated and may lead to disciplinary actions, dismissal or even criminal prosecution.

## 2. SCOPE

Qatalum’s Code of Conduct applies to all individuals working at or for Qatalum, including Company directors, employees, secondees, temporary personnel as well as to contractors and their personnel.



## 3. REPORTING



“Every employee should feel secure in seeking advice and in raising concerns.”

### 3.1. Asking a Question or Reporting a Concern

You have a duty to report any breaches or potential breaches of the Code when you become aware of them. If you have a question or concern about the Code or workplace behaviour, it is often best to talk to your line supervisor or manager. Line managers are responsible for making the Code known to their reports and for promoting and monitoring compliance with the Code.

You can also ask for help from another manager in your department or group, the Human Resources Department or the Legal Department. Alternatively, you may also contact the Conduct Violation Hotline at any time.



## 3. REPORTING

### CONDUCT VIOLATION HOTLINE

If you feel uncomfortable speaking to others directly about a violation of the Code, reports can be made through the Conduct Violation Hotline. Violations can include financial irregularities, frauds, breach of this Code of Conduct and other matters that could potentially prove damaging to the Company.

The Conduct Violation Hotline is administered by the Internal Audit Manager, who reports directly to the Board of Directors through the Board Audit Committee.

If you wish to make a report by telephone, **call +974 44030819**.

To make a report by e-mail, send a message to **conduct@qatalum.com**.

This e-mail address is only accessible by the Internal Audit Manager, who will keep your identity confidential at your request. If you prefer to make an anonymous report, create an anonymous e-mail account hosted by gmail.com, outlook.com, yahoo.com or other non-Qatalum domain.

### 3.2. Protection for Good Faith Complaints

Every employee should feel secure in seeking advice and in raising concerns. Qatalum will not tolerate retaliation against those who raise a concern in good faith, even if the concern turns out to be unfounded. Anyone submitting a false report in bad faith, however, may be subject to disciplinary action.

Allegations of retaliation will be investigated, and employees or managers who harass or retaliate against those who have raised concerns in good faith will be subject to disciplinary action. Retaliation can take many forms, including damaging career opportunities, issuing disciplinary actions, threatening or bullying.

## 4. OUR WORK PLACE



### 4.1. Working Conditions

Qatalum is committed to an inclusive work culture which appreciates that all people are valuable and should be respected for their individual abilities and views. In addition to respecting local values and customs, Qatalum's work environment should be pleasant, healthy and free from intimidation, hostility or other offensive behaviour toward employees, contractors, vendors or customers.

Any form of harassment, including sexual, verbal, physical or visual is strictly prohibited. This includes making defamatory or derogatory statements about a person's gender, colour, religion, age, national or ethnic origin, sexual orientation, or disability, whether verbal or written. The displaying or distribution of offensive or derogatory material is also strictly prohibited.

### 4.2. Fairness

Qatalum shall treat all employees fairly and with respect. In pursuing the Company's objectives, employees and business units shall use merit, qualifications and other professional criteria as the basis for employee-related decisions in Qatalum, such as recruitment, training, compensation and promotion.

**“Any form of harassment, including sexual, verbal, physical or visual is strictly prohibited.”**





## 5. HEALTH AND SAFETY



### 5.1. HSE Policy

Qatalum acknowledges its responsibility towards minimizing the health, safety and environment (HSE) risks related to its operations and the need to contribute to sustainable development. To achieve HSE excellence, Qatalum is committed to:

- Establishing HSE management systems conforming and certified to appropriate international standards and in line with legal requirements.
- Managing, controlling, and minimizing all forms of pollution and continually improving its environmental performance.
- Continual improvement in the field of HSE performance.

Health, safety, security and environment are an integral part of Qatalum's daily activities and are core elements of Qatalum's identity. You shall demonstrate proactive commitment to HSE excellence through your personal conduct and contribute to Qatalum's business success by taking an active part in building a viable HSE culture. You shall show determination and feel responsible for your own health, security and safety by being familiar with the risks relating to your work and the mitigating measures. Further, you shall execute your tasks in a secure, safe, healthy, environmentally conscious and efficient manner in compliance with applicable regulations. You must immediately report any accident, or incident at work that has the potential to cause injury or damage.

You have the right to refuse to work in situations that may cause harm. In addition, you have the responsibility to bring unsafe situations and behaviour that you observe to the attention of others at risk and to report them to management. You should be prepared to give and receive constructive feedback on any breaches of Qatalum's HSE policy.

### 5.2. Intoxicants /Substance Abuse

Qatalum is a drug-free workplace and you are expected to be in suitable mental and physical condition while at work for the effective and safe performance of your duties. Accordingly, you shall not be under the influence of intoxicating substances while at work.

The use or possession of any intoxicating substance (such as alcohol, non-prescription or illegal drugs) at the workplace is strictly prohibited. Qatalum reserves the right to search anyone on Company premises for intoxicants, and to require employees to submit to medical testing where there is cause to suspect the use of these substances.

In general, you shall refrain from using, or encouraging others to use, intoxicants in a manner that can place Qatalum or any of its business associates in an unfavorable light.



## 6. BUSINESS CONDUCT



### 6.1. General

Qatalum follows good business practices in all of its business operations. We avoid acting or encouraging others to act contrary to this Code of Conduct, even if such deviations under the circumstances may appear to be in the Company's interest. If you are uncertain whether a particular activity is legally or ethically acceptable, you should consult, in advance as far as practical, with your immediate supervisor or the Legal Department.

### 6.2. Compliance with Laws and Regulations

You shall comply with all applicable laws and regulations to your role in the Company and report any occurrences or circumstances that may have legal implications to the Legal Department. You are also required to obey the laws of other countries when travelling on business trips or training courses as a representative of the Company. You shall not assist others in any breach of laws, whether, or not, it constitutes an illegal act for the Company or yourself as an individual.

You shall adhere to the relevant Qatalum Rules and Regulations in force at any time.

“Qatalum does not tolerate corruption and bribery, whether direct or indirect.”



### 6.3. Corruption and Bribery

Corruption is dishonest or fraudulent conduct which can occur in a wide variety of activities. Corruption is often about money but also includes different types of favors, such as nepotism and supporting friends.

Qatalum does not tolerate corruption and bribery, whether direct or indirect.

You shall not, in order to obtain or retain business or gain any other advantage in the conduct of business, offer, promise or give anything of value or an undue advantage to a public official or to any third party to influence such person to act or refrain from acting in relation to the performance of her/his duties. This applies regardless of whether the advantage is offered directly or through an intermediary.

You shall not, in the conduct of your work for Qatalum, request, accept or receive any improper advantage that may influence your decisions. You shall be protected against any sanctions from Qatalum or any Qatalum representative for refusing to participate in any action that is or can be perceived as corruption, bribery or a facilitation payment.

### 6.4. Gifts & Hospitality

You are not permitted to accept gifts or favors from business associates that may affect or appear to affect your integrity or independence. Gifts and other favors can only be accepted to the extent they are modest, both with respect to value and frequency, and provided the time and place are appropriate.

Reasonable hospitality expenses incurred by Qatalum for business associates are generally acceptable if they comply with locally accepted good business practice and are directly related to the promotion, demonstration or explanation of Qatalum's products or services. Any gifts given should be modest, both with respect to value and frequency. In no event, can the purpose of any gift, hospitality or other expenditure be to cause the recipient to improperly perform his or her duties.

If you are offered or have received such favors beyond common courtesy gifts, you shall, without delay, notify your immediate superior or the Legal Department who will determine whether your integrity or independence may be perceived to be affected.

## 6. BUSINESS CONDUCT

### 6.5. Charitable Donations, Sponsorships and Community Investments

Charitable donations are payments made for the benefit of society in areas such as education, health, culture, support to non-governmental organizations and other social welfare causes. Payments shall be made without demand or expectation of any business return, but may result in goodwill among certain stakeholders.

Sponsorships are payments, in cash or in kind, to associate the Company's name with an activity or an organization. In return, Qatalum receives rights and benefits, such as promotion of its name and products. Sponsorships should reflect Qatalum's values, provide a positive profile for the Company and create pride among employees. Community investments are made to build local capacity (in areas like education, culture and infrastructure), promote social welfare, transparency and anti-corruption, and support economic development in the local community. Charitable donations, sponsorships and community investments shall be based on a business case with the aim of benefitting both the community and Qatalum.

Charitable donations, sponsorships and community investments shall be based on a business case and should aim at benefitting both the society and Qatalum.



### 6.6. Political Contributions/Activity

Financial or other contributions to political entities or political activities shall not be made on behalf of Qatalum. Political material may not be displayed in the workplace or on Company property.

### 6.7. Competition

Qatalum's business policy is to vigorously compete and promote competition in full compliance with laws and business ethics. Employees dealing with customers and suppliers should ensure that our practices are compliant with competition and anti-trust legislation.

Please seek advice from the Legal Department in all matters involving competition risk exposure for Qatalum, yourself or any of the employees who report to you.

“Qatalum is committed to transparency and accuracy in all the Company's dealings, while respecting confidentiality and other applicable obligations.”



## 6. BUSINESS CONDUCT

### 6.8. Data Protection and Privacy

Qatalum protects information and data about current, former or potential employees, customers, suppliers or other business associates and their employees and other third parties, in compliance with applicable laws and regulations.

This means that all use of personal data, such as collection, registration, comparison, storage and deletion, or a combination of these, takes place in accordance with applicable laws and regulations.

### 6.9. Accurate and Complete Data, Records, Reporting and Accounting

Qatalum is committed to transparency and accuracy in all the Company's dealings, while respecting confidentiality and other applicable obligations. Qatalum is obligated to provide full, fair, accurate and understandable disclosure in its periodic financial reports, other documents filed with applicable regulatory authorities as well as in its other public communications. We must exercise the highest standard of care in preparing such materials, with particular attention to the following:

- Compliance with International Financial Reporting Standards (IFRS) and Qatalum's system of internal accounting controls.
- Keeping and presenting accounting records in accordance with Qatari law. Accounting records shall not contain any false or intentionally misleading or artificial entries. Moreover, they must fairly and accurately reflect in reasonable detail Qatalum's assets, liabilities, revenues and expenses as well as all transactions or related occurrences which shall be fully and completely documented.
- No transaction shall be intentionally misclassified as to accounts, departments or accounting periods, and unrecorded or "off the books" assets and liabilities should not be maintained unless permitted by applicable laws or regulations.
- No information shall be concealed from the internal auditors or the independent auditors.

The above also applies to non-financial reporting requirements, including information related to HSE, human resources or corporate governance.



## 6. BUSINESS CONDUCT

### 6.10. Money Laundering, Export/Import control

Qatalum is committed to comply with anti-money laundering and anti-terrorism laws.

Legislation related to export / import control and anti-terrorism imposes restrictions on countries, persons and entities with which Qatalum may do business. Trade sanctions restrict either certain types of activities, or prohibit trade or transactions involving certain parties, countries, or regions. In particular, certain laws may prohibit Qatalum from doing business with certain persons and organizations that are associated with narcotics, trafficking, terrorism, or other criminal activities together with those involved in the proliferation of weapons of mass destruction.

### 6.11. External Communications

Qatalum's profile in domestic and international markets is greatly influenced by our ability to communicate consistently and professionally with external parties, including the media. Consequently, Qatalum shall maintain a principle of openness and will be honest and responsive when dealing with interested parties outside Qatalum and society at large.

To ensure a consistent Company profile, only the following persons are generally authorized to speak to the media on behalf of Qatalum:

- CEO;
- Communication Manager;
- Staff expressly authorized by the CEO.

General inquiries about the Company or its employees and all inquiries from media should be directed to the Communication Department.



## 7. PERSONAL CONDUCT



“If you become aware of a potential or perceived conflict of interest, you shall, without delay, notify your immediate superior.”

You are expected to conduct business and generally behave impeccably towards business associates, colleagues, and others. This includes being sensitive to and respecting foreign cultures and customs.

### 7.1. Conflict of Interest

You shall not seek to obtain improper advantages – directly or indirectly – for yourself or someone closely related to you, or in any other way harm Qatalum’s interests, whether or not this constitutes criminal fraud.

You shall not take part in, or seek to influence, any decision under circumstances that can give rise to an actual or perceived conflict of interest. Such circumstances may be, but are not limited to, a personal interest – economic or otherwise – directly or through someone closely related to you.

You should avoid having a personal ownership interest – directly or indirectly – in any other business or enterprise if it compromises or could appear to compromise your duties in Qatalum. If you are in such a situation, you shall immediately inform the HR Department.

Before engaging in any activity that may be perceived to advance the interests of a competitor, customer or supplier (or other business associates) at the expense of Qatalum’s interests, you shall consult with, and get approval from, a Group Manager. You must never act in competition with Qatalum’s business activities or otherwise in contravention with Qatalum’s interests.

You shall not use confidential information that has come to your knowledge in your service for Qatalum for personal gain for yourself or others.

If you become aware of a potential or perceived conflict of interest, you shall, without delay, notify your immediate superior. Conflicts of interest may not always be clear-cut, so if you are uncertain, you should consult one of your supervisors, the Legal Department or the Internal Audit Department.

### 7.2. Use of Company Property and Assets

It is the responsibility of all Qatalum employees and other representatives of the Company to safeguard the assets and records of Qatalum and its customers, suppliers and other business associates. All such assets shall be used and maintained with care and respect while guarding against waste and abuse. The use of materials, financial and other assets or facilities for purposes not directly related to Company business is prohibited without authorization from an appropriate Qatalum authority. The same applies to the removal or borrowing of Company assets without permission.

### 7.3. Confidentiality

Intangible assets, such as intellectual property, innovative ideas, and business and financial information, are valuable Qatalum assets and must be properly managed and protected. Qatalum's general policy of openness and transparency shall not prevent appropriate protection of information that may be of value to Qatalum's business interests.

Information other than general business knowledge and work experience that that has come to your knowledge in your service for Qatalum shall be regarded as confidential and treated as such.



#### **No Rights Created**

This Code of Conduct is a statement of certain fundamental Qatalum principles, policies and procedures that govern the Company's employees and members of the board of directors. It does not create any rights for any customer, supplier, competitor, other business associate, shareholder or entity or any other person that is not an employee or board member.



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