



ALUMEX PLC

THE ALUMEX WAY – CODE OF BUSINESS PRINCIPLES

1. Purpose

The Alumex Way is an ethical road map for all Alumex PLC (Hereinafter called as “Alumex”) and its employees, providing the guidelines by which the Alumex PLC conducts its businesses and operations in all the countries we will be operating.

2. Scope

Alumex is committed to conducting its business operations with honesty, integrity and with respect to the human and societal rights and interests of all stakeholders. Alumex and its employees are required to comply with the laws and regulations of the countries in which it operates.

Every employee shall be responsible for the implementation of and compliance with the Code in his / her environment. Failure to adhere to the Code could attract severe consequences, including termination of employment.

3. Policy Statement

a) Competition

Alumex believes in and supports the development of fair and appropriate competition, and will market the company’s products and services in accordance with the principles of fair competition and all applicable laws and regulations and will not make any unfair and / or misleading statements about competitors’ products and services.

b) Employees

Alumex is committed to providing equal opportunities to all its employees without regard to their race, caste, religion, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. We will comply with all local labour laws, while encouraging the adopting of international practices.

All employees will be treated with respect and dignity and the right to freedom of association. We will strive to provide all employees with a safe and healthy work environment, and we will not use any form of child labour or forced or compulsory labour including modern slavery. Also the due care, recognition and regulatory compliance will be assured for female employees at work.

c) Business Integrity

Alumex and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended, or perceived, to obtain uncompetitive favours for the conduct of its business. The company shall cooperate with governmental authorities in efforts to eliminate all forms of bribery, fraud and corruption.

However, Alumex and its employees may, with full disclosure, accept and offer nominal gifts, provided such gifts are customarily given and / or are of a commemorative nature.

d) Environment

Alumex shall strive to make continuous improvements in the management of environmental impacts and prevent the wasteful use of natural resources and be committed to improving the environment, particularly with regard to the emission of greenhouse gases, and shall endeavor to offset the effect of climate change in all spheres of its activities. Alumex shall comply all regulatory requirements in terms of environmental and societal well-being in its entire operations, expansions of operations and waste management processes.

e) Consumers

Alumex is committed to providing quality products and services which consistently offer value in terms of price and quality, and which are safe for their intended use. The quality standards of the company's goods and services shall meet applicable national and international standards accepted by the customers. All products and services will be properly labeled and advertised and communicated.

f) Corporate Responsibility

Alumex is committed to good corporate citizenship, not only in the compliance of all relevant laws and regulations but also by fulfilling our responsibility to improve the quality of life of the people in the communities in which we operate with no harm to human rights and act in the best interests of all stakeholders.

g) Public Activities

Alumex will co-operate with governments and other organizations, both directly and through bodies such as trade associations in the development of proposed legislation and other regulations which may affect legitimate business interests.

Alumex does not support or favour any political party nor contribute to the funds to any party to promote party interests.

h) Shareholders

Alumex shall be committed to enhancing shareholder value and complying with all regulations and laws that govern shareholder rights.

The Board of Directors will provide timely, regular and reliable information on our activities, structure, financial situation and performance to shareholders in accordance with relevant regulations and agreements.

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i) Conflict of Interest

All Alumex employees shall always act in the interest of the company and ensure that any business or personal association which he / she may have does not involve a conflict of interest with the operations of the company and his / her role therein.

Alumex employees must not seek gain for themselves or others through misuse or their positions.

j) Regulatory Compliance

Employees of Alumex, in their business conduct, shall comply with all applicable laws and regulations in all the territories in which they operate. If the ethical and professional standards of applicable laws and regulations are below those of the Code, then the standards of this Code shall prevail.

Directors of Alumex shall comply with applicable laws and regulations of all the relevant regulatory and other authorities. As good governance practice they shall safeguard the confidentiality of all information received by them by virtue of their position.

4. Policy Administration Procedure

Any breaches to the Code must be reported in accordance with the procedures specified by the HR & Administration Department. The Board of Alumex expects Alumex employees to bring to their attention or to that of Senior Management, any breach of suspected breach of these principles. Provision has been made for employees to be able to report in the strictest of confidence and no employee will suffer as a consequence of doing so.
