

# ALUMINIUM DUFFEL BV CODE OF CONDUCT

## **CONTENT**

<b>LETTER OF THE MANAGING DIRECTOR</b>	<b>3</b>
<b>1 – INTRODUCTION</b>	<b>4</b>
<b>2 – ACCOUNTABILITY</b>	<b>4</b>
2.1 – Responsibilities of All Employees	4
2.2 – Responsibilities of Managers & Supervisors	4
2.3 – Responsibilities of Senior Management	4
2.4 – Responsibilities of Suppliers	5
<b>3 – BREACHES OF THE CODE</b>	<b>5</b>
<b>4 – LEGAL &amp; ETHICAL ISSUES</b>	<b>6</b>
4.1 – Compliance with the law	6
4.2 – Using and Accounting for Company Resources	6
4.3 – Confidentiality, Proprietary Information, and Intellectual Property	6
4.4 – Fraud, Bribery and Corruption	8
4.5 – Fair Call Hotline	9
4.6 – Conflicts of Interest	9
4.7 – Counterfeit parts	10
4.8 – Copyrighted Materials and Trademarks	10
4.9 – Trade Practices Policy	10
4.10 – Privacy	11
4.11 – Gifts and Entertainment	11
4.12 – Outside Appointments	12
<b>5 – HEALTH, SAFETY AND ENVIRONMENT</b>	<b>12</b>
5.1 – Occupational Health, Safety and Wellbeing	12
5.2 – Alcohol, Drugs and Tobacco	13
5.3 – Environment	13
<b>6 – HUMAN RESOURCES</b>	<b>14</b>
6.1 – Recruitment and Selection	14
6.2 – Managing Diversity, Equity and Inclusion, Harassment and Bullying in the workplace	14
6.3 – Freedom of Association and Collective Bargaining	15
<b>7 – COMPANY INFORMATION &amp; EXTERNAL RELATIONSHIPS</b>	<b>15</b>
7.1 – Information Systems and Technology	15
7.2 – Disclosure of Company Information	16
7.3 – Relationships with Government	17
7.4 – Government and Media Requests	17
7.5 – Political Contributions and Activities	17
<b>8 – COMPLIANCE PROCEDURES</b>	<b>17</b>
<b>9 – RECENT DOCUMENT VERSION HISTORY</b>	<b>18</b>



## Letter of the Managing Director

*At Aluminium Duffel BV, our Values have always been the foundation of our Company. Each day, every one of us is faced with difficult decisions and choices which challenge us to do the right thing. Our Values and Code of Conduct exist to guide us through those challenges and ensure we uphold our commitment to integrity so that we can deliver superior value for our customers, suppliers, shareholders and employees.*

*Our Company's reputation and future success relies on our actions and thoughtful decisions. It is only through adherence to our Values and Code of Conduct that we can conduct business according to Aluminium Duffel's highest ethical standards and the law.*

*We all have a responsibility to speak up and take action when we see something that conflicts with our Values. In the complex world in which we operate, you may face situations where the right thing to do is not always clear. Aluminium Duffel makes many resources available: your supervisor or team leader, the senior managers, your HR representative, your HSE representative, your union delegates, your legal team or any subject matter expert (e.g. Finance, Procurement, Commercial).*

*Because only when we do the right things, when we're thoughtful about how to drive decisions with integrity, we will be successful. Aluminium Duffel upholds the highest standards of respect for the protection of human rights for all stakeholders. We hold our employees and suppliers responsible for following these standards. Our policies communicate that we will not tolerate forced, compulsory or child labor or discrimination of any kind in our global operations. We respect our customers and other stakeholders who work for or with Aluminium Duffel.*

**Geert Vannuffelen**  
Managing Director



## 1 – Introduction

Aluminium Duffel (referred to in this text as "the Company") is committed to its companies, leaders, employees, contractors and suppliers adhering to high standards of business conduct and complying with the law and best practice.

This document sets out the Company's expectations with respect to business behavior. It also establishes procedures for the reporting and management of breaches as they occur.

The obligations set out in this Code of Conduct (referred to in this text as "the Code") apply to all persons (e.g., suppliers, contractors, visitors) engaged in any capacity in Aluminium Duffel.

## 2 – Accountability

### 2.1 – Responsibilities of All Employees

All employees are expected to be familiar with the contents of the Code. Employees must also have an understanding of the business practices and policies that directly relate to their role and work location. It is every employee's responsibility to comply with the Code.

Employees should seek assistance from a manager or supervisor if they do not fully understand how it should be applied.

### 2.2 – Responsibilities of Managers & Supervisors

Managers and supervisors must take all reasonable steps to ensure that Aluminium Duffel employees (and where appropriate, consultants, contractors, business partners and visitors) are aware of and comply with the Code.

Managers and supervisors must also:

- Ensure that all employees have access to relevant Aluminium Duffel policies and procedures;
- Respond promptly and seriously to employees' concerns and questions about business conduct issues and seek further assistance if required;
- Consult with the next level of management if problems occur; and
- Demonstrate exemplary behavior that other employees can follow.

### 2.3 – Responsibilities of Senior Management

Senior Managers have operational responsibility for ensuring compliance with the Code, and are responsible for ensuring that their Department, Business or Function:

- Fosters a workplace environment that promotes and encourages honest and open communication about business conduct issues, emphasizes the importance of operating in accordance with the Code and avoids placing pressure on employees to deviate from the standards contained in the Code;
- Establishes internal reporting and approval processes that address high risk areas in relation to business conduct;
- Prepares supplementary guidance and support for employees about how to conduct business in particular markets consistent with the Code;
- Uses training consistent with the Code and tailored to the operational needs of the business;
- Follows relevant procedures for reviewing the credentials of others such as consultants, contractors and partners before entering agreements with them; and
- Incorporates the key elements outlined in this Code in performance management processes, employment contracts, induction procedures, industrial agreements and similar systems.



## 2.4 – Responsibilities of Suppliers

Our Code of Conduct embodies a framework outlining the standards of integrity for which we strive throughout our business and supply chain. Suppliers are expected to agree to the terms of this Code and uphold this Code in all of their business operations. Our Code of Conduct applies to all our suppliers and other stakeholders with whom we do business.

## 3 – Breaches of the code

Any individual who breaches the Code or any of the guidelines or policies under it, or who authorizes, is aware of or permits any breaches will, subject to a review of the circumstances, be subject to disciplinary action, up to and including possible dismissal.

The highest standards of corporate conduct are critical to Aluminium Duffel's reputation and success and therefore employees are encouraged to report any actual or suspected breach of the Code. If you become aware of conduct which causes you concern or a decision or action which appears to be inconsistent with the intent of this Code, you should immediately report it to your manager or supervisor, who has a responsibility to report the matter to Senior Management. If you feel unable to do this, there are a number of other avenues for raising a question or concern. You can raise a question or concern by contacting any of the following:

- Any member of Senior Management
- The Company's Human Resources, Legal or Finance department
- The Managing Director
- Aluminium Duffel's independent and anonymous [toll-free] hotline, as listed in the "Whistleblower Policy", which is located on the Aluminium Duffel intranet.

The above are responsible for promptly responding to employees' questions and concerns regarding business or Company conduct. They must ensure that the information they provide is accurate and that their advice is consistent with the Code. All concerns and questions will be treated seriously. The course of action taken to answer a question or respond to a concern will depend on the nature of the issue and its severity. It may be possible to resolve a matter by involving only one person. However, some situations, such as those involving significant legal or financial matters may require advice and input from additional sources such as legal advisers or auditors. In all cases, confidentiality will be maintained to the highest degree practicable. Any employee who reports a breach or suspected breach of legal or ethical standards in good faith will not be subject to retaliation, retribution or other recriminations for making that report. At times, compliance with the Code will affect Aluminium Duffel's chances of winning or retaining business. Situations that involve a conflict between upholding the Code and protecting Aluminium Duffel's short-term commercial interests should be openly and honestly discussed. These situations must be resolved in a manner that does not compromise Aluminium Duffel's reputation or standards.



## 4 – Legal & Ethical Issues

### 4.1 – Compliance with the law

Some laws affect everyone, such as those concerning equal employment opportunity, occupational health, safety and bribery, fraud, or corruption. Other laws primarily affect employees in particular roles, such as those concerning product liability, credit management, tax, trade practices and fair competition. It is every employee's responsibility to ensure that they fully understand all laws and regulations relevant to their role.

The laws that govern Aluminium Duffel's business activities may be complex, but ignorance of the law does not excuse Aluminium Duffel or its employees from their obligation to comply. Employees should seek advice from the Legal department if they are unclear about laws or regulations relating to their work. Matters relating specifically to taxation should be referred to the Finance department for guidance.

### 4.2 – Using and Accounting for Company Resources

Employees must not use Company funds, property, equipment, or other resources for personal benefit. In addition, employees are responsible for safeguarding the Company resources under their control, including information, and for maintaining accurate Records regarding the use of these resources. In particular:

- Employees should use Company funds sensibly and effectively. Expenditures must be reported accurately and in a timely manner. Submission of a fraudulent or misleading expense report is regarded as serious misconduct;
- An accurate and auditable record of all financial transactions relating to the Company must be maintained in accordance with relevant accounting standards. No entry should be made in the Company's financial records that distorts or disguises the true nature of any transaction. Nonfinancial records such as personnel files, environmental documentation, statutory records and safety
- Statistics ("Records") must also be accurately and rigorously maintained;
- Unauthorized removal of Company equipment, supplies or other resources is regarded as theft;
- Company resources must not be sold, loaned or donated without management approval;
- Employees should take appropriate precautions to prevent theft, damage or misuse of Company resources. For example, unattended buildings, storage areas and Company vehicles should be locked when they are not in use. Employees must not duplicate keys to Company property without authorization from management;
- Employees should not destroy or dispose of Company resources without management approval. Employees are prohibited from intentionally damaging Company resources; and
- Disposal of Company Records, and other documentation should be in accordance with the law and applicable Company standards and guidelines.

### 4.3 – Confidentiality, Proprietary Information, and Intellectual Property

Information is a valuable corporate asset, and the open and effective dissemination of information is critical to our success. However, much information about Aluminium Duffel's business activities is confidential or proprietary.

We comply with applicable laws and regulations that govern the rights to, and protection of our own and others' intellectual property, including patents, trademarks, copyrights, and trade secrets.

Confidential information is information that Aluminium Duffel considers private and that is not common knowledge outside the Company. Proprietary information is information Aluminium Duffel owns, develops, pays to have developed, or to which it has an exclusive right. Both confidential and proprietary information can be written as well as unwritten.



Confidential and proprietary information may include but are not limited to:

- Cost and pricing, including unpublished information about past, current and future prices;
- By methods which Aluminium Duffel determines its bids;
- Documents, records, or other information concerning Aluminium Duffel's business strategies, sales or marketing plans or activities, business results, unannounced products or services, and financial results and data;
- Customer and employee records;
- Data entrusted to an employee by a customer, supplier, or consultant;
- Software or computer systems developed by Aluminium Duffel;
- Aluminium Duffel's trademarks and plans for new trademarks, which include symbols, words and phrases
- Used to identify and distinguish Aluminium Duffel's products and services;
- The products of Aluminium Duffel's research and development, such as inventions, patents and engineering information;
- Aluminium Duffel's processes, procedures and know-how;
- Organizational information;
- Operational information; and
- Any other information that could be of use to a competitor to place Aluminium Duffel at a competitive disadvantage.

Because the disclosure of such information could seriously damage Aluminium Duffel's interests, safeguarding this information is the responsibility of all Aluminium Duffel employees. If you learn about Company proprietary or confidential information during the course of your employment, you should be careful not to share it with others including fellow employees unless they need to know for a legitimate business reason. You should also guard against unintentionally disclosing proprietary or confidential information. Situations that could result in inadvertent disclosure of such information that you should be sensitive to may include but are not limited to:

- Discussing confidential or proprietary information in public places such as restaurants, public transport, elevators or aeroplanes;
- Posting content/comments to social networking sites, blogs, forums or in private emails or text messages;
- Talking about it in public, on a mobile phone or mobile device;
- Working with sensitive material on mobile devices in public; and
- Transmitting such information by unsecured means.

Your obligation to protect Aluminium Duffel's confidential and proprietary information continues even after you leave the Company.

Just as Aluminium Duffel values and protects its own confidential and proprietary information, it is our policy and practice to respect the confidential and proprietary information of third parties with whom Aluminium Duffel has agreed to treat such information in confidence. Aluminium Duffel also values and protects the personal information of employees.



#### 4.4 – Fraud, Bribery and Corruption

Aluminium Duffel prohibits and shall not tolerate the following practices at all times and in any form, in relation to (i) a public official at international, national, or local level (ii) a political party, party official or candidate to political office (*public corruption*), and (iii) a director, officer, employee or representative of any enterprise which Aluminium Duffel is considering a business relationship or has already entered in such relationship (*private corruption*):

- (a) **Bribery** is the offering, promising, giving, authorizing or accepting of any undue pecuniary or other advantage to, by or for any of the persons listed above or for anyone else in order to obtain or retain a business or other improper advantage, e.g., in connection with public or private procurement contract awards, regulatory permits, taxation, customs, judicial and legislative proceedings.
- (b) **Extorsion** is the demanding of a bribe, whether or not coupled with a threat if the demand is refused. Workers will oppose any attempt of extorsion or alike solicitation and are encouraged to report such attempts through the reporting channels provided under point 4.5.
- (c) **Influence peddling** is the offering or solicitation of an undue advantage in order to exert an improper, real or even supposed influence with a view of obtaining from a public official an undue advantage.
- (d) **Laundering** the process of the corrupt practices mentioned under (a) to (c) above is the use, the concealing or the disguising of the illicit origin, source, location, disposition, movement or ownership of property, knowing that such property is the proceeds of a corrupt practice.

The above-mentioned practices, encompassing both passive (the act of accepting bribes or illicit benefits) and active corruption (the act of actively initiating, offering, or soliciting bribes or illicit benefits), are hereinafter referred as corruption.

Aluminium Duffel employees and contractors must not

- (a) Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- (b) Give or accept any gift or hospitality during commercial negotiations or tender processes that could be perceived as intended or likely to influence the outcome, refrain from accepting disproportionate hospitality from a third parties, and avoid offering or accepting gifts to or from government officials, representatives, politicians or political parties without prior approval from a management team member. see also: 4.10 - Gifts and Entertainment)
- (c) threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns about a corrupt practice;
- (d) make or accept payments in cash or e.g., money, equipment, personal time) to charities that have a connection with politics and amount to political contributions, a decision-making role or influence over procurement decision; or
- (e) engage in any other activity that might lead to a breach of the above.

Aluminium Duffel shall not tolerate any form of fraud. All actual or suspected fraud or act of corruption should be referred to Human Resources, Legal and Finance, for investigation. Where genuine fraud, corruption, or other criminal activity is genuinely suspected, Aluminium Duffel will alert and work with police and seek to press charges. Perpetrators will be subject to suspension, dismissal and civil action to recover any financial loss caused to Aluminium Duffel. Aluminium Duffel's Fraud Policy and Global Compliance Manual are located on the intranet. Dishonest activity involving deception which results in actual or potential financial loss amounts to fraud. Dishonest activity involving a misuse of a position within Aluminium Duffel to achieve personal gain for you, or another person or entity amounts to corruption.

Involvement in fraud, bribery and corruption is a criminal offence and threatens the reputation of Aluminium Duffel and represents a fundamental risk to our brand and business. If the only way to





win business requires paying a bribe or otherwise breaching the Code, Aluminium Duffel does not want the business.

Aluminium Duffel employees and contractors must not offer, promise, authorize or pay anything of value to any person who works for or represents any of our current or potential customers or suppliers to influence that person to perform their function improperly or reward them for doing so.

Employees and contractors also must not offer or provide a benefit or "secret commission" to an agent or representative of another person or company in order to obtain a business advantage for Aluminium Duffel where the agent or representative intends to conceal their receipt of that benefit.

Aluminium Duffel or its employees could also commit other criminal offences if they are involved in receiving or concealing the receipt of profits won by paying bribes or other things of value, or in concealing the nature or recipient of a bribe or other benefit in Company financials and Records.

Aluminium Duffel can be liable under anti-corruption laws for the actions of agents, distributors, consultants and other contractors, particularly where they are affiliated to or otherwise provide a benefit to a foreign public official or where they otherwise breach anti-bribery laws. Particular care must be taken with contractors who assist in securing business, or who arrange introductions to key Government decision-makers in a foreign country. In accordance with the Aluminium Duffel Procurement Procedure, employees must conduct appropriate background and reputation checks in accordance with the off-shore agent appointment procedure before selecting or commencing negotiations with any agent, distributor, consultant or other contractor.

#### 4.5 – Fair Call Hotline

Aluminium Duffel expects employees who become aware of improper conduct to raise those concerns. The Company's Fraud Policy and Whistleblower Policy contain the contact details of Aluminium Duffel's independent and anonymous [toll-free] hotline.

Anyone who identifies and reports (possible) violations of European Union law in a work-related context is considered a whistleblower, this includes, but is not limited to government contracts, financial services, products, and markets, prevention of money laundering and terrorist financing, product safety and conformity, transportation safety, environmental protection, radiation protection and nuclear safety, food and feed safety, animal health, and animal welfare, public health, consumer protection, protection of personal privacy and personal data, and security of network and information systems, combating tax fraud and combating social fraud. This protection includes the company's own employees, as well as, third parties (self-employed workers; shareholders; directors; volunteers; trainees; anyone working under the supervision and direction of (sub)contractors and suppliers; former employees; job applicants).

Reporting can be done via: [aluminiumduffel.sdwhistle.com](https://aluminiumduffel.sdwhistle.com)

#### 4.6 – Conflicts of Interest

The accepted standard in business and under this Code, is that all business decisions are at "arm's length" and impartial. A conflict of interest is a situation where an individual stands to benefit, directly or indirectly, as a result of a decision they make on behalf of the Company. That is where it can be argued that their capacity to make a proper and impartial decision is compromised.

For managers and employees at all levels, the potential for conflict of interest is a business reality. For example: whether to employ a friend or family member even though you believe they are the best candidate; whether to purchase a product or service where it can be argued there is some personal benefit; or whether to enter into a business arrangement with a person or entity with which you are not fully at arm's length.

Whilst avoidance is always preferable, often the issue is less about whether a conflict of interest exists, but how individuals deal with such situations. Aluminium Duffel's expectation is that



employees recognize and immediately disclose to their manager or supervisor any situation or decision that involves, or could be perceived by others to involve, a conflict of interest. This will protect the employee as well as the Company. If in doubt, contact Senior Management or the Legal department.

In the case of Aluminium Duffel's Directors and Senior Management, it should be noted that specific disclosure or approval requirements might arise with regard to conflict of interest situations under the Corporations Act, the Company's Constitution, other policy or governance documents and related party disclosures in Aluminium Duffel's financials and Records.

#### 4.7 – Counterfeit parts

We expect suppliers to develop effective methods and processes for their products to reduce the risk of supplying counterfeit parts and materials, in a similar way as we do.

Effective processes must be in place to prevent counterfeit parts and materials:

- prevent
- detect them;
- report;
- quarantine them;
- not re-enter the supply chain

If counterfeit parts and/or materials are discovered or suspected, suppliers should immediately inform the recipients of such counterfeit parts and/or materials.

#### 4.8 – Copyrighted Materials and Trademarks

Many materials used in the course of work are protected by copyright laws such as computer software, audio and video tapes, trade journals, books, and magazines. Presentation slides, training materials, management models, or other materials prepared by outside consultants or organizations may also be copyrighted. You should not reproduce, distribute, or alter copyrighted materials owned by others without valid permission of the copyright owner or its authorized agent. As it is not always easy to determine if such permission exists, you must obtain such permission before using these materials.

Aluminium Duffel's trademarks, service marks, logos and marketing slogans are also valuable assets, which must be protected. Employees should ensure these proprietary marks are used properly and only for legitimate business purposes of Aluminium Duffel.

#### 4.9 – Trade Practices Policy

Aluminium Duffel conduct its global business in compliance with export controls, economic sanctions and national security restrictions administered by the United States, the European Union, the United Kingdom, Japan and Switzerland, among other jurisdictions throughout the world.

Aluminium Duffel is committed to a pro-competitive culture and compliance with the competition, anti-trust and trade practices laws of all countries in which it operates or conducts business. Compliance with these laws also promotes ethical standards and a commitment to free and fair competition. Specifically:

- Conduct that is prohibited by competition, anti-trust or trade practices laws must be avoided. Where the impact of the law is uncertain, employees must seek appropriate legal advice from the Legal department and act on an informed judgment;
- No employee has authority to contravene this policy or to authorize or condone contravention by others. Contravention cannot be justified by claims of ignorance, good intentions or failure to seek legal advice and will be regarded as a serious breach of your responsibilities and duties as an employee;



- Aluminium Duffel will continue to conduct employee education and compliance programs on a regular basis to help ensure the success of this policy;
- Any employee becoming aware of a breach or potential breach of competition, anti-trust or trade practices laws should report their concerns to the Legal department; and
- Aluminium Duffel intends to promote a co-operative relationship with relevant consumer and regulatory agencies in countries where it operates.

#### 4.10 – Privacy

Aluminium Duffel is committed to protecting the privacy of individual's personal information and to compliance with the Belgian Privacy Legislation and the GDPR rules as mentioned in the work regulations and in the customer and vendor contracts. Any customer information must be managed in a professional and ethical manner with regard to use and distribution of internal Records. If customer records contain information of a personal nature, that information is not to be used for any other purpose or disclosed outside the organization without the permission of the customer or the individual concerned unless required to be provided by law.

The following guidelines should be adhered to:

- Only collect personal information if it is necessary for your business activities and only by lawful and fair means;
- Use personal information only for business purposes relevant to Aluminium Duffel's relationship with the individual;
- Only disclose personal information as advised in Aluminium Duffel's GDPR Guidelines;
- Protect personal information received;
- De-identify personal information where necessary or appropriate;
- Allow individuals to access and correct their personal information where appropriate;
- Be aware of the Aluminium Duffel's GDPR rules and
- Do not collect sensitive information without appropriate consent.

Personal information is information or an opinion about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. Generally, an individual's name will have to be on the relevant record before it might be categorized as personal. However, in some circumstances other details may be sufficient to ascertain an individual's identity.

#### 4.11 – Gifts and Entertainment

Employees must exercise care with respect to giving or receiving business related gifts. This applies to direct payments and to payments in kind, including the provision of goods or services, personal favors and entertainment such as meals, travel and tickets to events.

Accepting or offering gifts of moderate value [defined as less than 100 EURO] is acceptable in situations where it is legal and in accordance with normal business practice such as where the exchange of gifts is customary, and the gifts are appropriate for the occasion. However, employees must not give or accept gifts of any kind in circumstances that could be reasonably regarded as unduly or improperly influencing the recipient or creating a business obligation on the part of the recipient. In particular, gifts should not be given in circumstances that could in any way be seen as an attempt to gain influence in respect of any particular matter to the advantage of Aluminium Duffel or to speed up an approval, consent or other administrative process. If there is any doubt, the situation should be referred to your manager or supervisor.

The golden rule is disclosure. Ensuring your manager or supervisor is aware of all gifts that may be considered inappropriate or significant it ensures transparency and seeks to avoid any suggestion of a conflict of interest. Gifts and entertainment must be disclosed to your manager. Your manager or supervisor must approve ostentatious or expensive gifts. Similarly, if an employee receives a gift, they should consult their manager or supervisor for a decision on whether it should be kept, handed to the Company or returned. Small and modest gifts should be reported to your manager



or supervisor. The monetary value of the gift and legal requirements should be considered when determining whether a gift should be retained by an employee, handed to the Company or returned. If it is determined that a gift should be handed to the Company, the gift should be donated to a nominated charity or made available to all employees in the department. The course of action will depend on the type of gift received. The following items must not be given or accepted under any circumstances, regardless of their value: cash or personal cheques; drugs or other controlled substances; product or service discounts that are not available to all employees; personal use of accommodation or transportation; and payments or loans to be used toward the purchase of personal property.

Under no circumstances should an employee request a gift of any kind from a supplier, customer, or other party with whom Aluminium Duffel conducts or is likely to conduct business. In addition, employees must not exchange gifts with representatives of Aluminium Duffel's competitors, since the provision or receipt of such gifts may create an actual or perceived conflict of interest. This policy also applies to employees' immediate family members and to any agents or third parties that are employed to represent the Company.

#### **4.12 – Outside Appointments**

Employees must seek approval from their manager or supervisor before accepting a directorship in another business corporation, statutory authority or similar body. Each case will be considered on its merits.

Approval is required for positions in Government advisory bodies; political parties; professional institutions; trade associations; charitable, public, social, or sporting organizations; and similar groups if the position:

- Has senior or high status;
- Will involve a significant amount of the employee's time to the extent that it could affect their ability to fulfil their responsibilities to the Company;
- Is likely to involve public controversy; or
- Will involve activities or features that are or could be incompatible with Aluminium Duffel's policies or standards.

Employees should obtain approval before accepting any significant payment for their involvement with an advisory board or similar group, including reimbursement for travel and related expenses. Whenever an employee participates in an outside activity, it is their responsibility to ensure that any opinions they express are clearly their personal views and cannot be interpreted as the views of the Company.

Full-time employees are only allowed to pursue additional employment, provided that it does not conflict in any way with the interests of the Company and, for so far, such additional employment is not in conflict with the guidelines outlined in this Code.

Any employee whose situation may require approval should advise their manager or supervisor. Where necessary, requests for approval should be referred to the relevant Senior Manager and the Managing Director advised appointment along with the approval provided.

## **5 – Health, Safety and Environment**

### **5.1 – Occupational Health, Safety and Wellbeing**

Aluminium Duffel is committed to achieving the highest performance in occupational health, safety and wellbeing with the aim of creating and maintaining a safe and healthy working environment throughout its businesses.

Consistent with this, the Company will:



- Comply with all applicable laws, regulations and standards and where adequate laws do not exist, adopt and apply standards that reflect the Company's commitment to occupational health and safety;
- Seek continuous improvement in its occupational health and safety performance taking into account evolving community expectations, management practices, scientific knowledge and technology;
- Involve employees and contractors in the improvement of occupational health and safety performance;
- Train and hold individual employees accountable for their area of responsibility;
- Avoid, manage and mitigate risk by implementing management systems to identify, assess, monitor and control hazards and by reviewing performance;
- Ensure that Aluminium Duffel employees, contractors and visitors are informed of and understand their obligations;
- Communicate openly with employees, government and the community on occupational health and safety issues;
- Contribute to the development of relevant occupational health and safety policy, legislation and regulations; and
- Support relevant occupational health and safety research.

## 5.2 – Alcohol, Drugs and Tobacco

Aluminium Duffel recognizes that circumstances vary among different cultures and countries regarding the use of alcohol, drugs, and tobacco. However, despite these differences, every employee is responsible for taking appropriate steps to prevent workplace injuries and illnesses and for contributing to a safe and healthy work environment. This obligation includes responsible behavior with respect to the use of alcohol, drugs, and tobacco when conducting Company business and at Company sponsored activities.

Employees must not be impaired by illegal or legal drugs, including alcohol, while at work or when conducting Company business. Under the Company's various health/fit for work programs, compliance with these requirements may be assessed at any time.

Poor work performance repeatedly caused by alcohol or drug use, or significant impairment that creates a safety risk, are regarded as serious misconduct. In addition, Aluminium Duffel prohibits the possession, transfer or use of illegal substances on Company premises or sites, in conjunction with Company business, at Company functions or Company sponsored activities.

## 5.3 – Environment

It is Aluminium Duffel's approach to achieve a high standard of environmental care by complying with relevant legislation and seeking continuous improvement in performance by taking account of evolving scientific knowledge and community expectations. Specifically, Aluminium Duffel's approach is to:

- Comply with all applicable laws, regulations and standards;
- Uphold the spirit of the law and where laws do not adequately protect the environment, apply standards that minimize any adverse environmental impacts resulting from its operations, products and services;
- Communicate with Government and the community on environmental issues, and contribute to the development of policies, legislation and regulations that may affect Aluminium Duffel;
- Ensure that its employees and suppliers of goods and services are informed of Aluminium Duffel's approach and are aware of their environmental responsibilities in relation to Aluminium Duffel's business;
- Ensure that management systems identify, control, mitigate and monitor environmental risks arising from operations;
- Limit the direct and indirect impact of its activities to the environment;



- Limiting our environmental impact by reducing:
  - our resource consumption (water, energy, raw materials)
  - our discharges to water
  - our emissions to air, water and soil
  - our noise emissions
  - our waste
  - our GHG emissions
- Improve biodiversity and deforestation;
- Limiting the amount of waste sent to landfill by encouraging reuse, sorting and recycling;
- Limiting the use of dangerous and chemical substances to what is strictly necessary and always ensuring that such usage complies with laws and regulations;
- Choosing suppliers who share our commitment to protecting the environment;
- Choosing electricity from renewable sources;
- Reducing the carbon footprint of our aluminium products.

## 6 – Human Resources

Aluminium Duffel is committed to maintaining an efficient, skilled, diversified, equity, inclusion, flexible and committed workforce through a range of employment practices and arrangements. While most employees will be engaged on a full-time permanent basis, a range of alternatives are available, to meet specific business requirements.

Aluminium Duffel will not tolerate any violation of the International Labor Organization (ILO) Principles.

We comply with ILO and gender equality rights, collective bargaining agreement No. 25 of October 15, 1975 on equality of pay for male and female employees, amended by collective bargaining agreements No. 25 bis of December 19, 2001 and No. 25b of July 9, 2008.

### 6.1 – Recruitment and Selection

Aluminium Duffel recognizes that people are a distinguishing feature of a successful business and is committed to maintaining and building an appropriately skilled, motivated and diverse workforce.

Aluminium Duffel will select the most appropriate person for the position and will not compromise its selection criteria or processes. Aluminium Duffel's selection processes will:

- be thorough, consistent, efficient and respectful;
- be (and appear to be) fair, valid, impartial, transparent and non-discriminatory;
- assess merit against specific and multi-dimensional criteria (relevant and demonstrable knowledge, skills, qualifications, experience and operating style);
- ensure applicants are provided with sufficient information to understand the business, the requirements of the position, and the selection criteria to be applied; and
- respect privacy and confidentiality.

### 6.2 – Managing Diversity, Equity and Inclusion, Harassment and Bullying in the workplace

Aluminium Duffel is committed to maintaining a diverse workplace free of unlawful discrimination, harassment, and bullying. Aluminium Duffel is committed to ensuring that:

- Legislative standards are met with respect to the management of diversity, Equity and inclusion harassment and, bullying in the workplace;
- Applicable laws relating to working hours, wages, and benefit requirements are met;
- Employees, visitors, and others in the workplace shall not discriminate against any worker based on their age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, or union membership. This applies to recruitment, salary, promotion, or termination matters;



- All employment decisions are fair, reasonable, and based on merit;
- No individual or group is treated less favorably than another for reasons not immediately relevant to the circumstances;
- Employees, visitors, and others in the workplace are treated with respect in an environment free of unlawful discrimination, harassment, bullying, and offensive behavior;
- The display, storage, or transmission of material likely to cause offence will not be permitted on Company premises or equipment;
- Employees at every level understand their rights and responsibilities with respect to discrimination, harassment and bullying;
- Complaints of unlawful discrimination, harassment and/or bullying are taken seriously and are appropriately and promptly investigated.

Aluminium Duffel is committed to training and educating employees, managers and supervisors to be able to recognize, and deal with instances of discrimination, harassment and bullying in the workplace, as well as to promote harmony and equality in the workplace.

It is the responsibility of managers and supervisors to ensure that all workplace decisions and activities are free of unlawful discrimination, harassment, and bullying and to appropriately investigate all complaints or suspected instances of unlawful discrimination, harassment, or bullying.

The Company considers any breach to be misconduct. If, after investigation, allegations of harassment are substantiated, Aluminium Duffel will implement appropriate disciplinary action against those responsible, up to and including dismissal.

### **6.3 – Freedom of Association and Collective Bargaining**

Aluminium Duffel respects the right of employees to associate freely with trade union organizations of their choice without interference or negative consequences to them. The Company respects the right of employees to collective bargain and shall adhere to all applicable collective bargaining agreements (company, local, sectoral, national, international).

## **7 – Company Information & External Relationships**

### **7.1 – Information Systems and Technology**

Aluminium Duffel employees use a wide range of information systems and technology to conduct business, including smart and mobile phones, voicemail, the Internet, electronic mail, and other devices. Access to, and use of, these systems is subject to the Company's Working Rules and related policies, as amended from time to time.

The principles underpinning these policies include:

- Aluminium Duffel provides e-mail services and access to the Internet for legitimate business purposes. In some cases, third parties (other companies) may also provide Aluminium Duffel employees with access to their systems and equipment for specific business purposes.

- The use of these and other systems for non-Aluminium Duffel business represents a threat to system efficiency and security;
- All Company information is the property of Aluminium Duffel and, as such, must be treated as any other asset of the Company. Every employee is responsible for protecting the information communicated or stored on all electronic devices from accidental and unauthorized access, disclosure, modification, or deletion.
- Except in the course of an employee's duties or with the express permission of their manager or supervisor, employees must not use company computer, e-mail, intranet and Internet systems and networks or other devices:
  - using another person's username and password;
  - for personal commercial purposes;
  - for regular (daily) share trading and monitoring;
  - to send unsolicited bulk e-mail, to transmit chain letters, or for mass mailing (spamming);
  - to run instant messaging software;
  - to harass, abuse, or defame any person;
  - to receive and/or transmit pornography, profanity, or other offensive material;
  - for gambling purposes;
  - to play online or network games;
  - to obtain, possess, or transmit illegal or pirated material;
  - to obtain, possess, or transmit confidential or proprietary information without authorization;
  - for disseminating personal contact information of officers or employees of Aluminium Duffel without their consent;
  - for any other illegal purpose;
  - in a way that knowingly causes interference with or disruption to any network, information service, equipment, or any user thereof;
  - to knowingly download software or media files or data streams that will create a security risk or use a greater amount of network bandwidth than is appropriate; or
  - do anything else which will or may bring Aluminium Duffel into disrepute; cause Aluminium Duffel or any of its customers, suppliers, or other associates to bear unreasonable risks or costs; cause disruption to any of Aluminium Duffel's business or services or be in breach of any privacy obligations.
- Aluminium Duffel reserves the right to monitor the use of its information systems and technology. This includes monitoring the nature and content and restricting the transfer of certain material to or from employees.

## 7.2 – Disclosure of Company Information

The relevant Aluminium Duffel Lead Team member must approve all internally produced materials such as brochures, press releases, and reports for Government departments before distribution outside the Company. If any doubt exists about the appropriateness of the material or if the material will be distributed nationally or internationally, the matter must be referred to the Commercial and Legal department. In all cases, it is the responsibility of the Managing Director to ensure that both departments receive a copy of the material.

Employees who are asked to make public speeches on topics related to Aluminium Duffel must obtain the permission of their manager or supervisor. If the matter appears to have significant importance, it should be referred to Legal departments in advance.

Any employee who wishes to contribute an article or paper to an outside publication on a topic related to Aluminium Duffel must ensure that the document is approved in advance by the relevant Aluminium Duffel Senior Manager.





### 7.3 – Relationships with Government

Wherever Aluminium Duffel conducts business, the Company respects the authority of the Government. Aluminium Duffel will maintain honest relationships with Governments, their agencies, officials, and personnel.

Aluminium Duffel's ability to conduct business is directly affected by Government decision-making. Therefore, Aluminium Duffel seeks to have constructive relationships with the Government. Aluminium Duffel regularly shares information and opinions with the Government on issues that affect the Company. The exchange of information and opinions is essential to informed decision-making by both Government officials and Aluminium Duffel. Employees who provide information to Governments on behalf of Aluminium Duffel must ensure that all information is accurate and complete. Errors or omissions may be construed as a violation of a law or regulation and might damage the Company's credibility. Employees who lobby on behalf of the Company or represent Aluminium Duffel in Government matters must comply with all applicable laws and regulations, including Section 4.4 – Fraud, Bribery and Corruption, pertaining to corporate participation in public affairs.

### 7.4 – Government and Media Requests

Aluminium Duffel cooperates with reasonable requests from government agencies, authorities, and the media and has designated certain representatives to respond to such inquiries. If you are called upon by Aluminium Duffel for assistance with a governmental investigation or media inquiry, you must provide only truthful and accurate information. If a government or media representative approaches you, refer them to the Aluminium Duffel's Legal Department. Do not talk to government or media representatives on your own without prior approval and preparation, not because Aluminium Duffel has anything to hide, but rather so that correct and complete information is provided under appropriate circumstances.

### 7.5 – Political Contributions and Activities

Aluminium Duffel maintains a position of impartiality with respect to party politics. Accordingly, Aluminium Duffel does not contribute funds to any political party, politician or candidate for public office in any country.

Aluminium Duffel contributes to the public debate of policy issues that affect the Company. For example, Aluminium Duffel might discuss relevant issues with Government officials or provide written advice about the likely impact of proposed policies on the Company. At times, attendance at events hosted by a political party may be required for briefing purposes. Your manager must be consulted if there is any doubt about whether

attendance at a function would compromise Aluminium Duffel's impartiality or if any fee paid for attending the function is likely to exceed the cost to the political party of the meal or other aspects of the function. . During such events employees must always adhere to the guidelines stated in Section 4.4 – Fraud, Bribery and Corruption and 4.10 – Gifts and entertainment.

## 8 – Compliance Procedures

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem.

These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.



- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.

In the rare case where it may not be appropriate to discuss an issue with your supervisor or where you do not feel comfortable approaching your supervisor with your question or concerns, discuss it locally with a senior manager or directly with the Managing director. Aluminium Duffel will maintain the anonymity of the employee and the confidentiality of the information that is reported to the fullest extent possible consistent with the obligations to investigate the matter.

## 9 – Recent document version history

Version Issue Date Key Changes

June 30, 2023

