



ETHICS & COMPLIANCE POLICY

ETHICAL BUSINESS CONDUCT

Alucor's commitment to ethical business conduct is a fundamental part of our business and a value shared by the management and every Alucor employee. Full compliance with all applicable laws and regulations is critical not only to our success, but also to our existence as a company. E&C is everyone's concern.

ETHICS & COMPLIANCE POLICY

STANDARDS OF CONDUCT

All Alucor employees will observe and maintain high standards of ethical conduct in their relationships with clients, suppliers, subcontractors, communities, fellow employees, and others, wherever they work. Any action taken by Alucor or its employees, representatives, or agents must be fully justifiable and not raise questions as to the company's honesty, impartiality, or reputation, or otherwise cause embarrassment to the company. Alucor employees must avoid any interest, relationship or outside activity that could affect the employee's objectivity in making decisions concerning his or her Alucor duties and responsibilities. These standards of conduct also apply to members of the board of directors, agents, consultants, vendors, subcontractors, contract personnel, licensors, and others, when they are representing or acting for, or on behalf of, Alucor.

All Alucor entities and affiliates, and their employees worldwide, will act in full compliance with all applicable laws and regulations. Any compliance issues can be reported anonymously through whistleblower@alucor.com.

ALUCOR'S COMMITMENTS

- To provide clear and timely support and guidance to ensure full compliance with all laws and regulations in our areas of activities.
- To ensure the prevention of bribery through the proper implementation, compliance and continuous improvement of all Alucor instructions, including:
 - Receiving and offering gifts and hospitality
 - Working with sales partners
 - Relations with JV and consortium partners
 - Working with suppliers and professional advisors
 - Sponsorship and charitable activities
 - Prohibition of political contributions
 - Prohibition of facilitation payments and other forms of corruption
 - Data Privacy
- To ensure a timely investigation and treatment of all reports and guarantee the Alucor policies of full confidentiality and non-retaliation against any employee who reports in good faith.
- To ensure that appropriate disciplinary actions are taken against any employee who violates the E&C rules.

MESSAGE FROM THE MANAGEMENT

E&C is part of everything we do at Alucor. While working with colleagues, clients, partners, suppliers, agents, and any other third parties, it is our responsibility to act in accordance with our corporate policies. Any form of corruption, bribery, or inappropriate and unethical behavior is against what we stand for and can seriously jeopardize the reputation of the company and can lead to criminal liability for our employees.

We must all play our part to encourage ethical conduct within our teams and support E&C initiatives. When it comes to ethics and compliance, there should never be a second thought!

- **Nimish Bhatia**
President & CEO