

> Code of conduct

Aluminium Dunkerque

ADK-ELT1-USINE-POL-0003-Version 3.0 (english) - Aluminium Dunkerque's property

1 INTRODUCTION

ALUMINIUM DUNKERQUE is committed to all its employees and partners (including its subcontractors and suppliers) to comply with the highest ethical standards, with the applicable laws, and with the best practices for carrying out its commercial activities in a sustainable way. This Code of Conduct as well as the regulations, standards and related policies apply to all employees, and partners as well as any persons engaged in any capacity by ALUMINIUM DUNKERQUE.

This Code of Conduct complements our General Policy of the Site (ADK-USINE-ELT1-POL-0001), company-employee agreements, the internal regulations, the general purchasing policy and corresponding terms and conditions, the company's IT security policy and all the legal procedures and requirements applicable to ALUMINIUM DUNKERQUE

2 RESPONSABILITES

ALUMINIUM DUNKERQUE is responsible for making this Code of Conduct available and for updating it in case of any changes.

All officers, directors, and employees of ALUMINIUM DUNKERQUE are responsible for reading, understanding, and upholding the letter and the spirit of this Code of Conduct and the associated principles. We expect our suppliers, contractors, and any other partner that interacts with ALUMINIUM DUNKERQUE to conduct activities in compliance with the standards prescribed in our Code of Conduct.

Every employee is required to act responsibly with integrity and honesty, complying with all applicable laws, regulations, and company policies.

- For any incident of Fraud or Corruption, contact the referents mentioned in the Anti-Corruption Code of Conduct.
- For any act of harassment, contact the following advisers: laetitia.pudys@aluminiumdunkerque.fr or jean-louis.jansen@aluminiumdunkerque.fr

3 VIOLATIONS OF THE CODE - SANCTIONS

Compliance with this Code is essential to the reputation and success of ALUMINIUM DUNKERQUE, and consequently, Aluminium Dunkerque makes available different ways of reporting (see below) to allow every employee to report potential violations of the Code.

Any direct or indirect violation of the Code of Conduct and applicable laws, regulations, or policies; any act of vandalism, damage or theft; any manifest abuse of authority; any behavior or act of sexual or moral harassment; any physical or verbal assault compromising the integrity, respect and dignity of the person; any breach of the work instructions as well as anything that could disturb the order, the discipline or the safety of persons are liable to sanctions up to and including termination of employment. In addition, certain violations may result in legal sanctions.

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If you suspect or know of a decision or action that seems incompatible with this Code of Conduct, unsafe, unethical, or potentially harmful you should report it immediately. If you have a question, need help, or want to raise a concern you can address it with your line manager or escalate it to the Management Committee. Depending on the subject, you can also send your question or concern to one of the following people:

- For any incident of Fraud or Corruption: contact the General Manager of the site
- For any harassment incident: contact the site harassment referents or a member of the RPS group (Health Services, Social Assistance, or the members of Health and Safety Committee – C2SCT)

4 LEGAL AND ETHICAL PRACTICES

Compliance with laws

4.1

All employees of ALUMINUM DUNKERQUE are required to comply with all applicable laws and regulations, particularly in the areas described below

4.2 Fight against fraud, corruption and conflicts of interest

ALUMINUM DUNKERQUE assigns particular importance to compliance with the laws and regulations related to compliance with business ethics and the fight against corruption.

The Company, our employees, contractors, and business party are prohibited to, directly or indirectly, promise, offer, pay, solicit or accept any type of payment or retribution in the form of money, privilege, service or any other element of value with the intention of corruptly influencing business decisions.

The policy prohibits ALUMINIUM DUNKERQUE to accept gifts or invitations, unless they are of minimal value (less than 150 EUR in value) and offered without creating conflicts of interest/ Employees receiving gifts in the abovementioned circumstances must declare and seek approval of their line manager.

For further information, please refer to the anti-corruption code

4.3 Respect for Human Rights and Labor Law

ALUMINUM DUNKERQUE supports and respects the protection of human rights and the fundamental principles of labor law as defined by the United Nations in the Universal Declaration of Human Rights and by the International Labor Organization.

Employees, contractors, and business partners are prohibited to act in a way that directly or indirectly violates these principles.

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ALUMINUM DUNKERQUE encourages freedom of association and does not accept any form of forced or compulsory labor, or the use of child labor in any form and in particular the worst forms of child labor such as hazardous work which could harm the health, safety and morale of children. Aluminum Dunkerque respects the minimum age required to work according to the national and international laws in force. Persons under eighteen years old of age are prohibited from working on the site (SEVESO High Threshold Site)

4.4 Non-Discrimination, harassment, violence

ALUMINUM DUNKERQUE speaks out clearly against discrimination, harassment and violence and does not accept any form from it by its employees, contractors, and business partners.

Employees are recruited and considered based on their skills and merits for the position. All our work-related decisions are based on merit.

All employees of ALUMINUM DUNKERQUE benefit from the respect of their rights and from a harmonious work environment, free from intimidation, discrimination or any kind of coercion.

Acts of violence, threats, harassment, humiliation or exclusion are prohibited and subject to sanctions. The use of offensive or abusive language at work is not allowed.

Discrimination on the grounds of gender, race, color, body weight, physical appearance, HIV situation, national or social origin, religion, disability, political affiliation, sexual orientation, family situation, family responsibilities, age or any other condition that could give rise to discrimination under ILO conventions is prohibited. Bullying, discriminating conduct, sexual harassment, unwelcome sexual advances or other inappropriate personal conduct creating an intimidating, hostile, or offensive working environment are also prohibited. Such conduct is unacceptable and will not be tolerated, and persons responsible will be sanctioned in accordance with relevant laws and regulations.

5 HEALTH, SAFETY AND ENVIRONMENT

5.1 Health, safety and well-being at work

Aluminium Dunkerque strives to provide healthy and safe working conditions to all employees and contractors. We prioritize the prevention of the risk of accident or occupational disease. It requires everyone to perform their work safely, to know the emergency procedures that apply to the area where they work, to stop work if considered unsafe, to speak up on unsafe or unhealthy working environment, to report any accident, injury, illness, or unsafe conditions immediately, and to comply in general with all applicable health and safety regulations

All employees and contractors must comply with the safety instructions and use the required personal protective equipment (PPE) in accordance with their work area.

5.2 Tobacco, beverages and narcotic products

It is forbidden to introduce, distribute, and consume drugs or alcohol within the premises of Aluminium Dunkerque. Unannounced tests can be carried out at any time. All employees must behave responsibly with regard to smoking or vaping at work in the course

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of their professional activities. In accordance with anti-tobacco legislation, smoking and vaping are strictly prohibited outside of smoking shelters

5.3 Environment

The objective of ALUMINUM DUNKERQUE is to achieve a high level of environmental protection, respecting all applicable regulations and seeking continuous performance improvement and considering the best available practices and the expectations of communities where we operate. We strongly focus on preventing waste and optimizing the consumption of natural resources, in particular the use of water. ALUMINUM DUNKERQUE is committed to sustainable development and works with the objective of carbon neutrality and the optimal recovery of industrial waste. DUNKERQUE ALUMINUM strives to offset the effect of climate change by reducing its greenhouse gas emissions. All employees, contractors, and business partners are expected to respect the principles and instructions regarding environmental protection and must be aware of their environmental responsibilities

6 USE OF COMPANY PROPERTY, ASSETS & RESOURCES

Access to and use of ALUMINIUM DUNKERQUE's communication and information systems, including but not limited to cell phones, messaging, Intranet, Internet, email and other devices, are subject to acceptance and adherence of our Policy for the Use of Computer Resources (PSSI - DK-MAC-ELT10-POP- 0024) and the Security Policy for Computer Systems (ADK-MAC-ELT10-POP- 0025). Any fraudulent removal of assets belonging to ALUMINUM DUNKERQUE or to a company operating on the site is liable to disciplinary action and the corresponding legal proceedings.

All employees are responsible to protect the assets and resources (including information and data) belonging to ALUMINIUM DUNKERQUE under their control. Confidential information must not be shared with anyone in private or in public forums or social media.

All financial transactions must be recorded in accordance with applicable accounting standards, and specific statutory and regulatory requirements applicable to our business. Accounting documents must be accurate and complete, and must not contain any false, misleading or artificial entry. All transactions must be properly authorized, recorded, and reported.

7 CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Intellectual property is a very precious asset for ALUMINUM DUNKERQUE. All employees, contractors, and business partners must protect our intellectual property and must respect and protect the confidentiality and intellectual property of others. Most information is protected and must remain confidential such as documents protected by copyright and personal data in accordance with the principles of the General Data Protection Regulation (GDPR) and any other applicable principle of confidentiality.

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Employees, contractors, visitors and external personnel working at the Site of ALUMINIUM DUNKERQUE in any capacity are required to keep the most absolute discretion and professional confidentiality for all matters relating to manufacturing processes and, in general, on all operations of which they are aware in the exercise of their functions.

The employees of ALUMINIUM DUNKERQUE are required to ensure that this obligation is observed by the visitors for whom they are responsible.

8 EXTERNAL RELATIONS

Relations with the authorities

8.1

ALUMINIUM DUNKERQUE maintains constructive cooperation with authorities and regulatory bodies, both locally and internationally. ALUMINIUM DUNKERQUE strives to meet the needs of local communities whenever possible.

8.2 Contribution to political activities

In order to maintain its impartiality, ALUMINIUM DUNKERQUE does not contribute funds or resources to support any political party or candidate.

8.3 Publication and external communication

Any publication or external communication related to ALUMINIUM DUNKERQUE activities must be approved in advance and by a member of the Management Committee according to Communication Procedure (ADK-USINE-ELT9-PDG-0001).