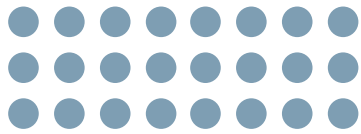


# Code of Ethics

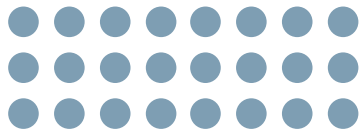
Putting our values into action





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EGA means Emirates Global Aluminium PJSC and the entities controlled by it or in which it holds a majority interest, including Guinea Alumina Corporation.





# Our purpose, mission and values

## Our purpose

Together, innovating aluminium to make modern life possible.

## Our mission

To generate value from mining to metal.

### For the world

Building deep customer partnerships to grow the use of the metal of the future.

Embedding sustainability in everything we do.

### For our societies

Driving sustainable economic growth.

Innovating the future of aluminium production.

### For our people

Putting safety first and always.

Becoming a talent-driven organisation.

### For our shareholders

Delivering competitive returns.

Growing our business for the future.

## Our values



### Safety & sustainability

We always put safety first. We care for people, our workplace, our communities and our planet.



### Integrity & fairness

We act with integrity and fairness with our stakeholders and each other at all times.



### Ownership & teamwork

We deliver results through personal ownership, and effective team collaboration.



### Innovation & continuous improvement

We create value through innovation and continuously improve our business, operations and ourselves.



# Section 1:

## About our Code of Ethics

Our values guide us



### **Our Values**

Our values define how we do business



### **Our Code of Ethics**

Our Code of Ethics is our guide and commitment to following our values



### **Our Policies**

Our policies provide detailed guidance on how we live our values as EGA and within specific business units

Integrity is doing the right thing even when no one is looking, the pressure is on or the right thing is unpopular.



## My commitment to you

At Emirates Global Aluminium we are united by our purpose - Together, innovating aluminium to make modern life possible. Our mission is to generate value from mining to metal and we have bold aspirations to fulfil over the decades ahead.

Achieving our goals requires trust – between each other, with our customers, our suppliers, our neighbours and society. Trust is hard won but quickly lost.

That is why Integrity & Fairness is one of EGA's values and why it matters how we work.

Our collective integrity is the responsibility of each of us. Our success depends on how we each conduct ourselves in the workplace, in our business, in the marketplace and in the world. We must do the right thing, the right way, every day.

Our Code of Ethics helps us understand what is right. By adhering to its requirements, we earn and maintain the trust we need to succeed. The Code of Ethics applies to everyone at EGA and its subsidiaries, wherever in the world we work and whatever our role.

We must each understand the ethical risks we face in our roles, how to manage them, and who to turn to for advice and help when in doubt. The Code provides clear principles for how we work and behave. It also gives practical examples.

I expect everyone at EGA to read our Code of Ethics and understand its requirements. That said, we recognise that ethics can sometimes be complicated. Therefore, if you are ever unsure about the right thing to do, please reach out for help. We have a dedicated Ethics & Business Integrity team available to support you, as well as Ethics Champions in each team.



I want everyone at EGA to be confident about speaking up about ethical concerns at work, including reporting any possible misconduct. I recognise that this can be hard and that speaking up can take courage. You have my personal assurance that I will support and protect anyone who speaks up honestly and with integrity and that there will be zero tolerance for any form of **retaliation**. Page 12 explains how you can report an ethical concern, whether on a named or an anonymous basis.

I ask each of you to join me in following our values, and the Code of Ethics, every day. Thank you for your continued support – let's ensure that EGA is somewhere we can all be proud to work.

**Abdulnasser Bin Kalban**

Chief Executive Officer

## Our commitment to you

Our Code of Ethics applies to all of us, wherever we work and whatever our job, without exception.



**Abdulla Kalban**  
Managing Director



**Abdunasser Bin Kalban**  
Chief Executive Officer



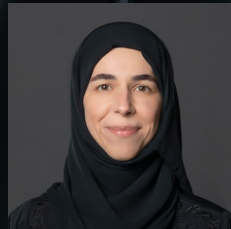
**Zouhir Regragui**  
Chief Financial Officer



**Katherine Hahm**  
General Counsel, Head of  
Compliance & Company  
Secretary



**Sergey Akhmetov**  
Executive Vice President  
Midstream



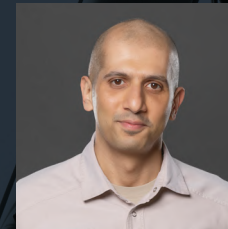
**Iman Al Qasim**  
Executive Vice President  
Human Capital



**Dr Feras Allan**  
Senior Vice President,  
Cathouse and Global Head of  
Technical Sales



**Salman Abdulla**  
Executive Vice President,  
HSSEQ and Business  
Transformation



**Zaher Al Habtari**  
Executive Vice President Capital  
Projects, Alumina & Bauxite



**Adel Abubakar**  
Chief Marketing Officer



**Simon Storesund**  
Chief Supply Chain and  
Business Development Officer



**Carlo K Nizam**  
Chief Digital Officer



**Simon Buerk**  
Senior Vice President,  
Corporate Affairs

### Each of us commits to following the letter and spirit of our Code of Ethics in everything we do:

- We lead by example and never compromise on our commitment to do the right thing the right way.
- We promote appropriate awareness and understanding of our Code in our Areas.
- We foster a workplace where everyone feels respected and safe to speak up.
- We do not tolerate unfair treatment, **discrimination** or **harassment** within the workplace.
- We protect anyone who raises a concern in **good faith** and we do not tolerate **retaliation**.
- We live our values and hold ourselves and others accountable for complying with our Code.



## Our shared commitment as EGA

Our Code of Ethics applies to everyone at every level of EGA. This includes employees, officers, members of our Board of Directors, and any third parties that provide services at the direction of EGA, such as individual contractors, consultants, and agents. Complying with the Code is a condition of our employment at EGA or business relationship with EGA.



### Each of us must:

- Understand and follow our Code and our policies.
- Comply with all applicable laws and regulations. When local laws allow behaviour that is not permitted by our Code, we comply with the higher standard set by the Code.
- Speak up about any known or suspected violation of our Code, our policies, or the law.
- Do what is right and take responsibility for the things we control.

### Supervisors and managers have additional responsibilities and must:

- Lead by example by following our Code and policies.
- Encourage team members to speak up and ensure they know how to report a concern.
- Support and protect individuals who speak up in **good faith** about any concern.
- Hold team members accountable when they violate our Code, our policies or the law.
- Ensure team members take all mandatory training courses.
- Consider how effectively their direct reports who are managers/supervisors perform these duties when evaluating their performance.
- Help team members to understand and comply with our Code and policies.
- Ensure a positive and inclusive work environment in which people are treated with respect.

# We comply with the law

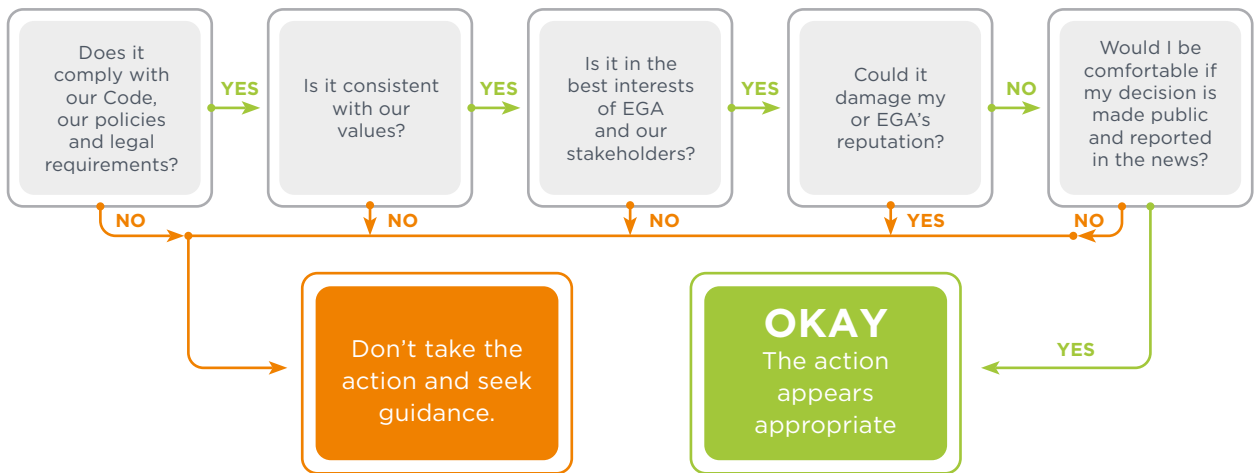
We operate all over the world and must comply with all applicable laws. When local laws allow conduct that is not permitted by our Code or other internal policies, we follow the higher standard set out in our Code or policies.

If we are unsure how to interpret or apply laws or regulations, we consult our Legal team before taking any relevant action.

# We do the right thing the right way

Our Code is a guide to ethical conduct defined by our values. It does not cover every situation. Instead, by setting out basic standards of business conduct, and providing other tools, information, and resources, it helps and guides us to make the right ethical decisions.

When we are not sure what to do, we ask ourselves the following questions:



If the answer to these questions is not clear, or we feel uncomfortable with the answer, we must seek guidance from our managers or the Ethics & Business Integrity team. Remember, if something does not feel right, it is probably not right.

EGA's Legal, Ethics & Business Integrity department is made up of three distinct functions:

- Company Secretariat
- Ethics & Business Integrity
- Legal



# We speak up if we see something wrong

We understand it is our responsibility to speak up if we have a question about doing the right thing or see or suspect something is not right. By speaking up, we demonstrate our integrity and commitment to doing the right thing the right way.

## We speak up if...

- We have a question about our Code, our policies or whether an activity is in accordance with our Code – we speak up!
- We know or suspect a violation of our Code, policy or the law – we speak up!
- We know or suspect inappropriate conduct – we speak up!

We don't wait for someone else to speak up. Often, a polite "please don't do that" can be enough to correct something that is not right. However, if that does not work, or we do not feel comfortable raising the issue directly, we speak up to someone who can help. Ignoring unethical or illegal conduct and not saying something about it, damages our integrity and increases risk.

## We know where to get help

In many cases our manager is best placed to help. If we are not comfortable speaking to our manager, we may contact any of the speak up resources listed in our Code.

We can always use the Your Voice report line to ask a question or report a concern (with the option to remain anonymous).

## We do not retaliate

To ensure people feel safe to speak up when they see something wrong, we must protect those who speak up honestly and in **good faith** from **retaliation**. We will not retaliate against anyone who, honestly and in good faith, comes forward and reports a concern. We understand that anyone who seeks to retaliate against a person that has reported a concern in good faith will be disciplined, which may include termination of employment or our business relationship.

## What if:

**Q:** I am afraid to speak up about misconduct. How will EGA protect me?

**A:** We take steps to protect the reporter. These include:

- Maintaining confidentiality and only sharing information on a "need to know" basis.
- Reminding those involved of our Your Voice Speak Up and Anti-Retaliation policies.
- Taking corrective actions if retaliation occurs. It is a serious disciplinary offence to retaliate.

If you think you are being retaliated against, contact the Ethics & Business Integrity team so that they can investigate and take appropriate action.

**Q:** I want to speak up, but do I have to give my name?

**A:** We want you to feel safe. You do not need to identify yourself and can choose to remain anonymous on the Your Voice report line. However, giving your name will make it easier to investigate your concern. Remember, we protect reporters by only sharing identity on a "need to know" basis.

# Speak up resources

In addition to other contacts suggested in this Code we can contact:

## Your Voice report line

This platform is hosted by an external provider bound by strict obligations of confidentiality. It is available 24/7, in multiple languages, and has the option for the reporter to remain anonymous.

[www.ega.ethicspoint.com](http://www.ega.ethicspoint.com)

8000-021 (UAE toll-free)

code 855-689-1296

Toll-free numbers for other countries are on the website.

## Ethics & Business Integrity

Our Ethics & Business Integrity team is available to answer questions, provide guidance, or address any ethics, compliance and business conduct concerns. You may contact members of the Ethics & Business Integrity team directly, or via:

[ethics@ega.ae](mailto:ethics@ega.ae)

+971 4 802 1011

### By mail, addressed to:

General Counsel, Head of Compliance & Company Secretary.  
Emirates Global Aluminium PJSC,  
PO Box 3627 Dubai, United Arab Emirates  
(please write on the envelope “to be opened only by the recipient”)

## Where can I find out more?

- Your Voice Speak Up Policy
- Anti-Retaliation Policy

## What if:

**Q:** I suspect misconduct but I don't have any evidence. Should I speak up?

**A:** Yes, you should speak up even if you only suspect misconduct. Please provide as much information as possible. There may be insufficient information for us to investigate, but you will have done the right thing and demonstrated your integrity. If Ethics investigates and confirms your suspicion was unfounded, you will be protected from any retaliation so long as your report was made honestly and in good faith. A report is not made in “good faith” if you provide false or incomplete information hoping to get someone in trouble

**Q:** I work on a company site, but I am not an employee. Can I report misconduct?

**A:** Absolutely. You can speak up direct to the Ethics & Business Integrity team or use the Your Voice report line. Your Voice is available to anyone who wants to speak up about EGA.





## **Section 2:** Acting with integrity in our workplace

We want EGA to be a great place to work. In this section of our Code, we look at how to act with integrity in our workplace. Click on each topic below to find out more.



<b>Looking after our health and safety</b>	<b>14</b>
<b>Protecting against alcohol and drug abuse</b>	<b>15</b>
<b>Supporting diversity and inclusion</b>	<b>16</b>
<b>Opposing harassment</b>	<b>17</b>
<b>Dealing with Intimate relationships in the workplace</b>	<b>18</b>

# Looking after our health and safety

## What matters to us?

We must ensure that everyone finishes work safely each day. Our health and safety policies and procedures are there to keep you and everyone around you safe, especially when working in hazardous conditions. We expect everyone to support a proactive safety culture and expect our leaders at every level to provide positive feedback and reinforce the right and safe behaviours.

## What does this mean?

- We come to work physically and mentally fit for work and look out for any threats to our own or others' physical and mental wellbeing.
- We STOP THE JOB, and stop others from working, if we think it is unsafe.
- We report any unsafe conditions and unsafe acts by using the EHS online reporting services, or alerting the Safety team or our Supervisor.
- We are responsible for our own safety and the safety of everyone around us, including our contractors and surrounding communities.
- We follow our Life Saving Rules and other health and safety policies and procedures, and never take shortcuts.
- We ask questions and raise concerns if we are not sure if something is right or how it works.



## What if?

**Q:** We are required to use a face shield when in front of an open furnace. A colleague does not use the face shield when standing right in front of the open furnace. They say they have been in the industry for 20 years and know how to do this work safely. Is this okay?

**A:** This is not okay. Your colleague is not behaving responsibly. Their behaviour is dangerous and could harm others. You should seek help from a supervisor or your manager as soon as possible.

**Q:** I am an Operator. I am following the safe procedure of work, but my supervisor has asked me to bypass the safety rules in order to complete the task faster. Is this okay?

**A:** Their behaviour is dangerous and could harm others. You should seek help from another supervisor or manager as soon as possible.

## Where can I find out more?

- EGA Life Saving Rules
- GAC Life Saving Rules
- Health & Safety policies and procedures
- Talk to Health & Safety, the Employee Assistance Program or the Ethics & Business Integrity team

# Protecting against alcohol and drug abuse

## What matters to us?

Alcohol and drug abuse is a big risk to our health, safety and wellbeing, including in our workplaces. To protect us all, we must not use alcohol or misuse drugs at work; this includes prescription and over-the-counter medications. We encourage anyone having problems with alcohol or drugs to seek appropriate help. Everyone must feel safe to speak up about threats to their physical and mental well-being.

## What does this mean?

- We do not bring alcohol or illegal drugs to work.
- We do not come to work under the influence of alcohol, illegal drugs or any other substance that could prevent us from performing our job safely or effectively.
- We seek medical advice if we are taking either controlled medication, prescription drugs or over-the-counter medicine which might affect our ability to do our work properly. We follow medical advice on whether it is safe to work while taking these drugs, and any precautions we must take, in accordance with health and safety policies and procedures.
- We seek help if we have an alcohol or drug problem.
- We look out for each other and speak up if we are concerned for a co-worker's physical and mental wellbeing and safety.

## What if?

**Q:** I have a bad headache. I took some tablets before coming to work, but my headache will not go away. I take some stronger tablets that make me feel sleepy, but carry on working. Is this okay?

**A:** No. Safety first and always. You should stop work, tell your supervisor and seek medical advice.

**Q:** I've been prescribed a controlled medication and have been warned about likely side effects. Should I tell someone?

**A:** Yes. Seek medical advice on whether it is safe for you to come to work, and follow health & safety policies and procedures.

## Where can I find out more?

- Substance Abuse and Testing Policy
- Talk to Health & Safety, the Employee Assistance Program or the Ethics & Business Integrity team



# Supporting diversity and inclusion

## What matters to us?

We believe that stronger companies are created when people of diverse cultures, backgrounds and lifestyles feel accepted and valued. We do not discriminate based on social identity, such as gender, age, culture, nationality, ethnicity, physical abilities, political and religious beliefs, marital status and other characteristics. We expect everyone to lead by example and encourage and support a positive team environment where everyone can contribute.



## What does this mean?

- We treat people fairly and with respect.
- We have an open mind, we listen to and learn from people with different backgrounds and perspectives.
- We do not bully, discriminate or harass; and we do not encourage or allow others to act in these ways.
- We speak up and do not turn the other way if we see or hear language or behaviour that does not meet our high expectations.

## What if?

**Q:** I'm considering internal candidates for a vacant position. Whoever takes the vacant role will be required to attend emergency callouts. One of the candidates is a young woman who I think will have issues coming to site in the middle of the night. Can I exclude her on this basis?

**A:** No. Employment decisions must be based on skills, experience and abilities – not gender. You should explain to all candidates what the role requires and let them decide whether they want to be considered for the vacant role. Do not discount a candidate because of their gender or other discriminatory factors.

**Q:** My colleagues talk amongst themselves in their native language whenever I pass by. I suspect they do this intentionally so that I can't understand what they are talking about. Should I ignore this?

**A:** We encourage you to speak to your colleagues and let them know that you feel excluded. If you do not feel comfortable doing this, or their behaviour continues, talk to your line manager, Human Capital or the Ethics & Business Integrity team.

## Where can I find out more?

- Talk to Health & Safety, the Employee Assistance Program or the Ethics & Business Integrity team

# Opposing harassment

## What matters to us?

We want an inclusive workplace where everyone is treated fairly and with respect. We expect everyone to speak up if they see or hear any **harassment**. Harassment includes bullying, intimidation and doing or saying anything that may be offensive to others. Sexual harassment includes unwelcome advances, inappropriate comments, requests for favours and other conduct of a sexual nature.

We expect managers and supervisors to take all claims of harassment seriously. Managers and supervisors must encourage a culture where everyone feels safe to report potential violations.

## What does this mean?

- We do not bully, discriminate or harass; and we do not encourage or allow others to act in these ways.
- We do not make jokes, use language, share pictures, or engage in other conduct that is hostile, intimidating or offensive.
- We do not retaliate against anyone who reports harassment or other misconduct, or who takes part in a company investigation of misconduct.
- When using social media, we act in a way consistent with our values.
- We look out for one another's well-being and speak up if we see or hear any unethical behaviour. We report, and encourage others to report, incidents of harassment.

## What if?

**Q:** My co-workers sometimes comment on my race – the way I look and the way I talk. I find their comments offensive. When I object, they say they are joking. Am I being too sensitive?

**A:** No, you are not being too sensitive. Your co-workers need to understand that their comments are not appropriate. Talk to your manager or Human Capital. If you're not comfortable doing this, or wish to be anonymous, contact the Ethics & Business Integrity team or report a concern on Your Voice.

**Q:** My colleague told a co-worker that they should stop asking about career opportunities and focus on their family instead. I was shocked, and I know it upset my co-worker. What should I do?

**A:** Speak up. Tell your colleague that comments like this are discriminatory and unacceptable, or speak to your manager or Human Capital. If you do not feel comfortable doing this, you may speak in confidence to the Ethics & Business Integrity team.

## Where can I find out more?

- Anti-Retaliation Policy
- Talk to Human Capital or the Ethics & Business Integrity team

# Dealing with intimate relationships in the workplace

## What matters to us?

We want an inclusive workplace where everyone is treated fairly and with respect. Intimate relationships between co-workers can create a conflict of interest and may change how someone behaves or the decisions they make. To avoid suggestions of favouritism or conduct that may make the workplace less fair and inclusive, employees are not allowed to date or have an intimate relationship with someone in their direct or indirect reporting line.

## What does this mean?

- We will advise Human Capital if we start to date or engage in an intimate relationship with an employee in our direct or indirect reporting line to facilitate reassignment.

We disclose all close personal relationships in the workplace (including spouses, partners, and anyone who we are dating or having an intimate relationship with) in accordance with EGA's **conflicts of interest** policy.

## What if?

**Q:** I suspect a manager is having a relationship with someone in their reporting line. Co-workers are starting to talk about how the manager seems to favour this person, and I think the relationship is inappropriate. What can I do?

**A:** If it is true, it is not appropriate. Report it to Human Capital or the Ethics & Business Integrity team so they can investigate the facts of the situation.

## Where can I find out more?

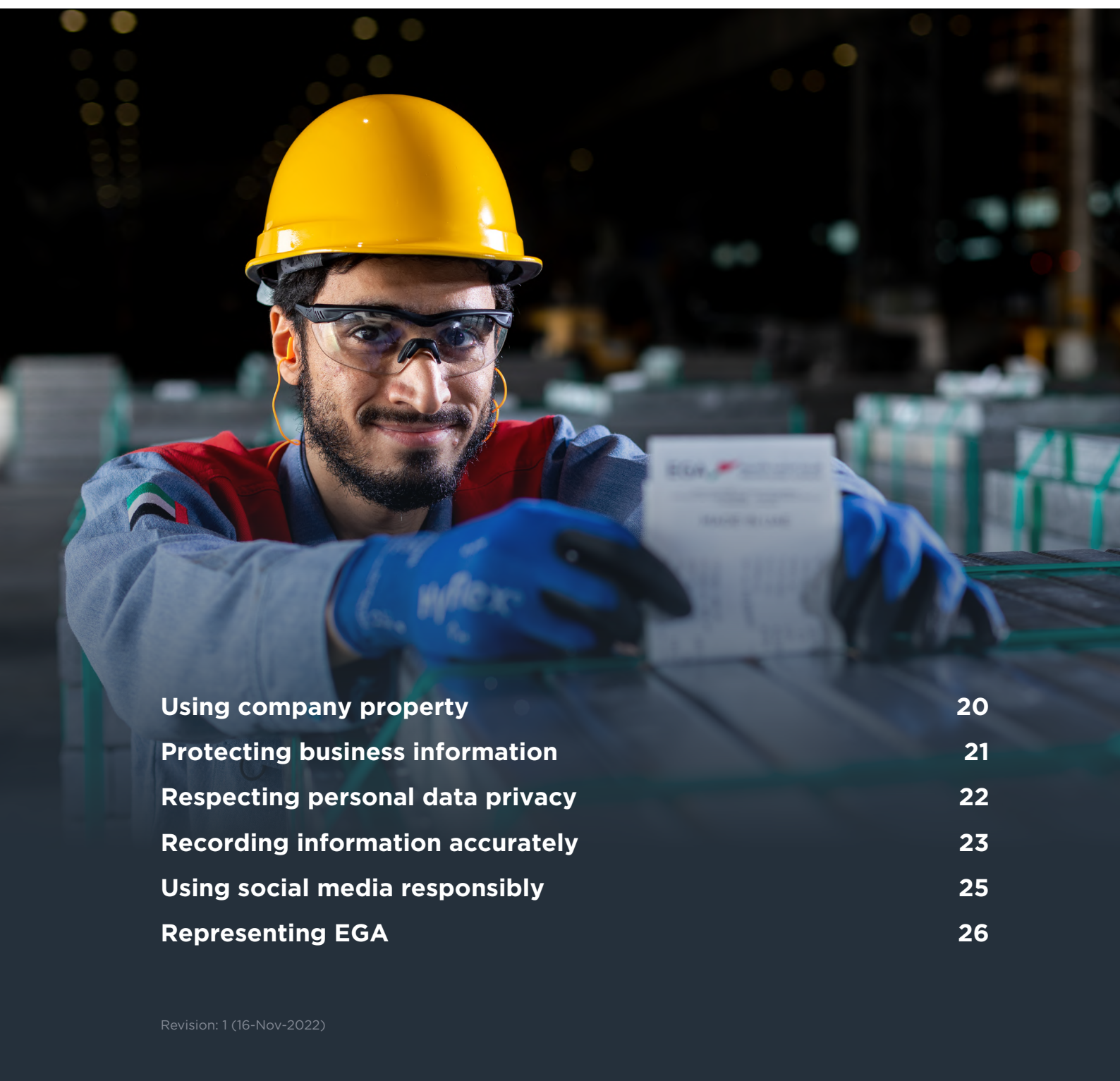
- Conflicts of Interest Policy
- Talk to Human Capital or the Ethics & Business Integrity team





## **Section 3:** Acting with integrity in our business

We want to be a global leader in all that we do, including how we conduct our day to day business. In this section of our Code, we look at how we act with integrity in our business. Click on each topic below to find out more.



<b>Using company property</b>	<b>20</b>
<b>Protecting business information</b>	<b>21</b>
<b>Respecting personal data privacy</b>	<b>22</b>
<b>Recording information accurately</b>	<b>23</b>
<b>Using social media responsibly</b>	<b>25</b>
<b>Representing EGA</b>	<b>26</b>

# Using company property

## What matters to us?

Company property (such as facilities, equipment, inventory, computer systems and communication tools like computers and phones) is there to help us achieve our business goals. Misusing or wasting company property hurts us all by damaging our operational and financial performance. We must safeguard company property against theft, loss or damage, waste, misuse and unauthorised access.

## What does this mean?

- We use facilities and equipment responsibly and for its intended purpose.
- We use systems and applications (including phone, email and internet) responsibly and safeguard accounts, passwords and access.
- We follow policies and procedures and exercise good judgement to ensure company property is properly managed and protected.
- We do not use company property for illegal or inappropriate purposes, or otherwise for purposes not directly related to company business.
- We do not take, borrow, sell, transfer, or donate EGA property without proper authorisation.

## What if?

**Q:** I used a company phone to make a personal call. Is this okay?

**A:** Limited use of company communication tools such as phones may be acceptable, provided it is not inappropriate, does not interfere in your job responsibilities and does not incur unreasonable costs. We must all demonstrate good judgement.

**Q:** My child needed paper to complete their homework. I didn't have time to go to the shop so took some from work. Was this wrong?

**A:** It was wrong. We understand why you did it but taking company property for non-work purposes is theft.

**Q:** A co-worker frequently seems to 'lose' items of personal protective equipment. When I asked them why, they said that it does not matter because the company is big and can afford it. Is this okay?

**A:** This is not okay. Everyone must take good care of our assets. Our resources are there to help everyone and to grow our business.

## Where can I find out more?

- Delegation of Authority Operating Policy
- Talk to your manager or the Ethics & Business Integrity team

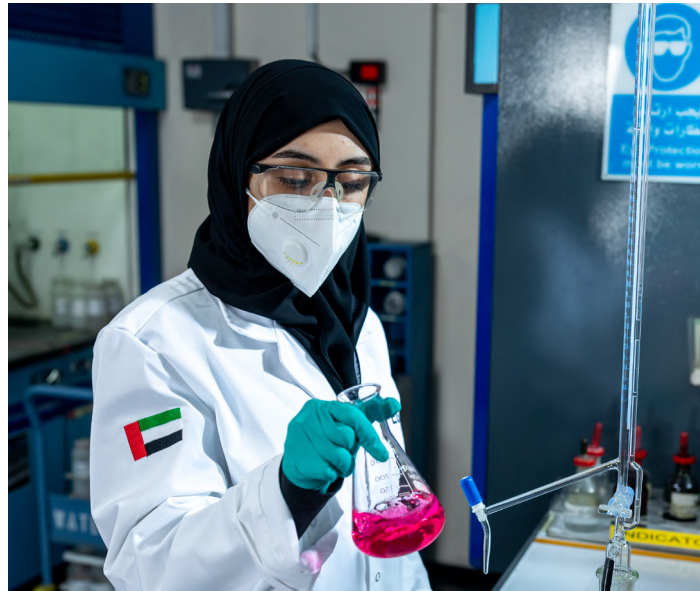
# Protecting business information

## What matters to us?

Information on our business, technical innovations and **intellectual property** is valuable. Inappropriate disclosures can hurt our business and damage our reputation as a trusted business partner. We expect everyone to protect our information and ideas, and only use other people's information and ideas in ways permitted.

## What does this mean?

- We do not share **internal information** outside EGA (including with our family, friends or on social media), unless we have the right to do so. We do not keep internal information (paper or electronic) when we leave EGA.
- We take appropriate measures to protect **confidential information**, on and off site, and only share with people who **"need to know"** for a legitimate business reason. We take particular care wherever conversations can be overheard, or data compromised.
- We do not use or share other people's information and ideas unless we are permitted to do so. This includes information obtained from a previous employer.
- We check with our manager if we are unsure whether information is confidential or not.
- We speak to Legal if we need advice on protecting our information and ideas or using and protecting someone else's information and ideas.



## What if?

**Q:** Friends often ask me about my work. Several of them work for companies that do business with EGA. Is it okay to discuss my work with them?

**A:** No, it is not appropriate to disclose internal information, even to friends. Information (written, electronic, verbal or delivered by any other means) that you receive as an employee is considered internal information unless it is publicly available. Moreover, if you are working with friends during the course of your work for EGA, you should have disclosed a conflict of interest and discussed with your line manager how to best handle this.

**Q:** I find some documents left by a photocopier. One of them is from a business partner and is marked 'confidential'. It looks interesting, so I read it. Is this okay?

**A:** No. You should not read the document. We must look after the information we receive from other people so documents that are confidential should not be left lying around, but if they are, and you come across them, you should not read them unless you are authorised to do so.

## Where can I find out more?

- Information Classification and Handling Policy
- Talk to Enterprise Security, Legal or the Ethics & Business Integrity team



# Respecting personal data privacy

## What matters to us?

- As a business we may collect and handle **personal data** on our stakeholders, including our employees, customers and business partners. Our commitment to respect privacy goes beyond legal compliance. We must earn the trust of our customers and other stakeholders by managing their personal data responsibly. Personal data is any information that can be used to identify someone and extends well beyond just names and contact information. We expect everyone to comply with EGA's Privacy Principles and handle the personal data we receive with care.

## What does this mean?

- We understand what personal data is, and our responsibilities under EGA's privacy policies.
- We comply with EGA's privacy policies and all applicable laws and regulations.
- We only collect, store, and use personal information if we have a clear business need and the appropriate authority do so.
- We only share personal data on a strict "**need to know**" basis. We must not access personal data if we do not have the appropriate authority to do so. If we receive personal data by mistake, we quickly tell the sender and delete the data without reading it.
- We protect personal data physically, and electronically, and take extra care when handling sensitive personal data such as health and medical data.

## What if?

**Q:** I have found some papers left in a meeting room, including photocopies of ID cards. Should I do something?

**A:** Yes. Documents should not be left unattended in meeting rooms. Contact Legal as these documents contain personal data.

## Where can I find out more?

- Staff Privacy Notice
- Data Protection Policy
- Data Storage and Retention Policy
- Information Classification and Handling Policy
- Talk to Legal or Privacy Champions

# Recording information accurately

## What matters to us?

Accurate records and reporting, both financial and non-financial, are essential for business success and maintaining the trust of our stakeholders. All business records must accurately reflect the underlying transactions and activities. Management relies on accurate information to take the right business decisions and to provide accurate and transparent information to shareholders and regulators. We expect everyone to act with integrity and accurately record and report all information.

## What does this mean?

- We take care when recording and reporting information and ensure that all information and business records that we prepare, process or approve are accurate and complete.
- We follow EGA policies and procedures and other applicable guidelines on recording, reporting and storing information.
- We only share information that is true and, if we identify an error, we tell our manager.
- We tell our manager or other appropriate authority if we are asked to write, say or approve something that is not true.
- We co-operate with our internal and external auditors and provide full and frank disclosure.



## What if?

**Q:** I was reading a report prepared by a colleague. I think it contains a significant mistake, but I'm nervous to say so. My colleague is more experienced than me, so maybe I'm wrong. If I'm right, it will make my colleague look bad. What should I do?

**A:** Discuss the issue with your colleague. If, having spoken, you still believe there's a mistake, speak to your manager about your concern. By doing this, you will protect the best interests of EGA and allow any mistake to be fixed before it causes a bigger problem.

**Q:** I told my supervisor that I am struggling with credit card debt. He told me not to worry and that he would help by submitting additional overtime claims for me. I didn't work those hours, but I don't want to make trouble for him or me. What should I do?

**A:** You must do the right thing and report it. We expect our people to behave honestly and act in the best interests of EGA. Falsifying overtime claims is fraud. There is no excuse for committing fraud. If you are experiencing financial difficulties, contact the Employee Assistance Program.

**Q:** I will be presenting to the ESG Committee on ESG performance. My manager wants the presentation to focus on areas where we have made positive improvements. He's asked me to exclude some key indicators where we are behind. I think this will give a false impression. What should I do?

**A:** A 'green scorecard culture' is misleading. Management relies on getting accurate and transparent information. This means providing the full picture with good and bad news, so that management can take steps to address any issues.

**Q:** My manager told me to ignore the controls in the published procedure as the business requires a fast response. He said no one follows the procedure anymore as it's not practical. Is this okay?

**A:** This is not okay. Procedures must be reviewed regularly to ensure they reflect changing requirements. If a procedure is no longer fit for purpose, then it needs to be updated, replaced, or withdrawn. There is no excuse for bypassing internal policies, procedures, and controls even if others do. Do not go ahead. Report the matter immediately.

### Where can I find out more?

- Policies and procedures relevant to your work
- Talk to your manager or the Ethics & Business Integrity team





# Using social media responsibly

## What matters to us?

Effective communication is important to our success. What we do and say inside and outside work matters. We must use common sense and follow EGA values when we are on social media, whether we are using company accounts and devices or our own. Inappropriate communications can damage the reputation of EGA and expose us to unnecessary risks.

## What does this mean?

- We uphold EGA's values and will not do anything to damage EGA's reputation.
- We do not use personal social media accounts to transact business.
- We do not allow our social media use to interfere with our duties to EGA.
- We think carefully before we post on social media and understand that we lose control of a post once posted – it can be forwarded, copied, printed or archived.
- We report any online post or activity relating to EGA that we believe is improper or not in accordance with our values and/or policies.

## What if?

**Q:** Can I mention EGA in a post?

**A:** Yes, but do not pretend to speak, or allow any perception that you speak on behalf of EGA (unless you are authorised to do so) and follow EGA's values and policies.

**Q:** I posted something on my private Facebook account. A co-worker said my statement was offensive and I should not have done this. My post has nothing to do with my work or EGA. Right?

**A:** Your responsibility to represent EGA and uphold our values extends outside the workplace. We do not tolerate any type of offensive behaviour. It may be possible to trace your connection to EGA. This could have serious consequences for our reputation, as well as for your employment with us.

## Where can I find out more?

- Social Media Policy
- Talk to Corporate Affairs or the Ethics & Business Integrity team

# Representing EGA

## What matters to us?

EGA's standing and reputation is influenced by our ability to communicate effectively. We must be honest and responsive when dealing with the media and other parties outside EGA. Only designated people are authorised to speak on behalf of EGA.

## What does this mean?

- As EGA people, we represent EGA and follow EGA's values at all times.
- We do not speak, or give the appearance of speaking, on behalf of EGA unless we are authorised to do so.
- We refer media questions and requests to Corporate Affairs.
- We obtain approval from our manager, Corporate Affairs and Legal before we agree to participate in a conference, speak at an event, or publish an article related to our work or that of EGA.
- We follow EGA's external communications policies and procedures.



## What if?

**Q:** I am at a party when someone asks if I work for EGA. I start talking and get on well with them. I make some very negative comments about one of our contractors. I'm sure they do not know this contractor. Is this okay?

**A:** It is not okay. You must remember that you are representing EGA and you must act professionally at all times. We must always treat our business partners with respect.

**Q:** I've been contacted by a local newspaper. They want to ask me about the project that's just completed. Can I speak to them?

**A:** No. You must follow the Communication Guidelines and refer any media enquiries to Corporate Affairs.

## Where can I find out more?

- Communications Guidelines
- Talk to Corporate Affairs or Legal



## **Section 4:** Acting with integrity in the marketplace

We want to build and maintain trust with our business partners. In this section of our Code, we look at how to act with integrity in the marketplace. Click on each topic below to find out more.



<b>Valuing our customers</b>	<b>28</b>
<b>Valuing our suppliers</b>	<b>29</b>
<b>Addressing conflicts of interest</b>	<b>30</b>
<b>Managing gifts and entertainment</b>	<b>31</b>
<b>Competing fairly</b>	<b>32</b>
<b>Opposing bribery and corruption</b>	<b>33</b>
<b>Dealing with governments</b>	<b>34</b>
<b>Complying with international trade controls</b>	<b>35</b>
<b>Preventing money laundering</b>	<b>36</b>



# Valuing our customers

## What matters to us?

Our customers are key to our continued success. We want to build lasting relationships, based on mutual trust and respect. We do this by offering quality and innovation, delivering excellent service, and working with integrity. By treating our customers with fairness, honesty and respect, we create valued partnerships delivering results for them and us.

## What does this mean?

- We win business fairly and never engage in unfair or corrupt business practices.
- We expect our customers to share our commitment to trust and transparency; we verify and screen customers in accordance with company policy.
- We listen to our customers, and communicate honestly and transparently about our products, prices and service.
- We honour our contractual obligations and other commitments. We do not make promises that we do not expect to keep.
- We handle customers' **personal data** in accordance with customer agreements and our data privacy policies.



## What if?

**Q:** A colleague and I meet a potential new customer. They want to place a large order for metal with EGA, but need the metal delivered urgently. I know we cannot deliver the metal quickly. My colleague says it will not be a problem and signs an agreement with the customer. Is this okay?

**A:** No. We must be honest in our dealings with customers. We must not over-promise or lie to our customers just to win business. This does not benefit our business in the long-term. It may damage our relationship with this customer and lead to legal action.

## Where can I find out more?

- Talk to the relevant Governance teams, Legal or the Ethics & Business Integrity team

# Valuing our suppliers

## What matters to us?

We recognise that our suppliers contribute to the success of our business; we value lasting relationships with our suppliers, based on mutual trust and respect. We are fair and transparent in our dealings with suppliers. In return, we expect our suppliers to comply with applicable laws and demonstrate fair and responsible work practices.

## What does this mean?

- We verify information provided by suppliers and perform appropriate **due diligence** in accordance with company policies.
- We select our suppliers fairly based on merit and the best interests of the company. We avoid any **conflicts of interest** or favouritism, and never engage in **bribery** or corruption.
- We protect suppliers' **confidential information** as if it were our own and handle any **personal data** with care and in accordance with our data privacy policies.
- We expect our suppliers to comply with our Responsible Sourcing Standard. We understand that as a company we are judged on whether our suppliers conduct their business responsibly.
- We watch out for any indication that a supplier is not meeting our expected standards of business conduct.

## What if?

**Q:** A supplier who is bidding for a new contract with us has offered a much lower price than the other bidders. I find out that they have been involved in a serious corruption case in this country. My manager would like to award them the contract. Is this okay?

**A:** This is not okay unless the risks have been adequately assessed. We do not do business with suppliers who do not meet our standards of ethics and integrity. Corruption is a serious crime and an unfair way to do business, wherever in the world you are. Tell the Responsible Sourcing team what you know about the corruption case, so they can make an informed assessment of the risks to our business and reputation.

## Where can I find out more?

- Responsible Sourcing Standard
- Talk to the Responsible Sourcing team or the Ethics & Business Integrity team

# Addressing conflicts of interest

## What matters to us?

We share the responsibility to work in EGA's best interests and act with integrity and fairness in everything we do. Sometimes, personal interests and relationships may appear to interfere with EGA's interests or our ability to do our job effectively and objectively. The mere appearance of a conflict of interest can hurt the company's reputation – as well as our own. We protect ourselves and EGA by avoiding **conflicts of interest** where possible and by being honest and open about potential conflicts of interest we cannot avoid.

## What does this mean?

- We recognise that even the appearance of a conflict of interest may be damaging.
- We understand that it is our responsibility to understand the common conflicts of interest situations, and to complete assigned training on conflicts of interest.
- We follow the Conflicts of Interest Policy and disclose all the facts about any conflicts that we cannot avoid. Having a conflict of interest is usually not a violation of the Code but failing to disclose it is.
- We excuse ourselves from any decision-making or oversight role where we have an interest that could influence, or appear to influence, our ability to make a fair and objective decision.
- We ask questions and seek guidance if we are not sure whether something might be a conflicts of interest.



## What if?

**Q:** My relative has joined a new company. The company services some of our plant machinery. I have not told anyone about this. Is this okay?

**A:** This is not okay. You need to tell us about this. It could be a conflict of interest.

**Q:** An old school friend has transferred into my team. We're not that close anymore, and I was not involved in the move, but some people say they only got the job because of me. Is there a conflict of interest and have I done something wrong?

**A:** Even the appearance of a conflict can be damaging. If you were not involved in your friend's transfer, then you have done nothing wrong – your friendship has no bearing on their suitability for the job. However, it may look like a conflict to some people. You must protect yourself by following the policy and declaring the relationship. To ensure fairness and objectivity, you should not be involved in any performance or employment decisions relating to your friend.

## Where can I find out more?

- Conflict of Interest Policy
- Talk to the Ethics & Business Integrity team



# Managing gifts and entertainment

## What matters to us?

Offering and receiving gifts and entertainment can help build working relationships, but they can also expose us to risk by creating a conflict of interest between our professional duty and personal interest. To protect ourselves and the company, we must think carefully before offering or accepting any gift or entertainment. There must always be a legitimate business purpose, and gifts and entertainment should never be used to try and influence decisions.

## What does this mean?

- We may only offer and accept gifts and entertainment that are appropriate and in line with company policy.
- We must not accept or give cash (or cash equivalents like gift vouchers) outside of any EGA scheme or event approved by the Ethics & Business Integrity team.
- We understand that strict rules apply to dealings with **government officials**. We must not make any gift or offer of entertainment to a government official without advance approval from Legal, Ethics & Business Integrity.
- We may only accept nominal gifts and entertainment that are under a certain value and appropriate in line with company policies. We must not accept gifts or entertainment when involved in a related purchasing, sales or business decision.
- We declare gifts and entertainment received in accordance with company policy and ask for advice if unsure about the appropriateness of a gift or entertainment.

Many countries have strict laws on gifts and entertainment provided to government officials. Many government entities also have strict rules preventing their representatives from accepting gifts and entertainment.

Who is a government official? Legally, government officials may include officials and employees of any government entity (including the legislature, judiciary and administration), government agency and state-owned entities (including commercial ventures in which a government has a controlling interest).

## What if?

**Q:** A supplier has invited my manager and me for dinner at a restaurant. My manager says there's no need to declare it. Is that right?

**A:** That is not right. You must think about the value, purpose and frequency of this entertainment event, and how it might look to an outsider. Check the Gifts & Entertainment policy and speak to Ethics & Business Integrity team for advice and support.

## Where can I find out more?

- Gifts & Entertainment Policy
- Anti-Bribery and Anti-Corruption Policy
- Talk to the Ethics & Business Integrity team

# Competing fairly

## What matters to us?

We build long-term business partnerships through trust. Our business partners trust us to work with integrity, including in relation to our competitors. We respect our competitors and support fair and transparent competition in compliance with applicable competition laws.

## What does this mean?

- We understand that competition laws are strict, complex and differ from country to country. We always consult with Legal if we have any questions or concerns.
- We do not collude, or otherwise agree, with competitors (formally or informally) to fix prices, limit production or supply, rig bids, allocate markets or customers, or collectively boycott customers or suppliers. This is anti-competitive.
- We obtain competitive information legally and ethically. If we inadvertently receive sensitive commercial information about a competitor, we must consult with Legal.
- We take special care when attending trade associations or industry meetings where competitors are present. We always consult with Legal before attending such meetings or joining a trade association involving competitors.



- We respect our competitors and do not make false or disparaging comments about their products or business.

## What if?

**Q:** I am at an industry event. There's a lot of chatter about rising costs and the need to increase prices. What should I do if someone asks me about our pricing plans?

**A:** You must not share or exchange price information with competitors. If a competitor starts to share such information, politely end the conversation, and report the matter immediately to Legal. Even silent participation in a conversation like this can appear to be price-fixing and is unethical and, in most countries, illegal.

## Where can I find out more?

- Global Guidelines on Competition Law Compliance
- Talk to the General Counsel, Head of Compliance & Company Secretary

# Opposing bribery and corruption

## What matters to us?

**Bribery** and corruption are unfair, illegal, and ultimately hurt people. We expect our people to always act with integrity. We do not engage in bribery or corruption, no matter what the local custom or practice is. Our zero-tolerance policy includes '**facilitation payments**' – payments to obtain or speed-up routine government actions.

## What does this mean?

- We act with integrity and follow our Anti-Bribery and Anti-Corruption Policy, and all relevant anti-corruption laws. We never ask for or accept a bribe, and never offer or give a bribe.
- We understand how **conflicts of interest**, gifts or entertainment, and dealings with **government officials** expose us to increased bribery and corruption risks.
- We recognise people who stand up to bribery and corruption and will not penalise them if we lose business or incur costs as a result.
- We work with business partners who share our commitment to ethical business conduct. We understand the importance of following the company's **due diligence** processes and contracting procedures.
- We complete all assigned training on anti-bribery and corruption.
- We speak up if something does not feel right and must contact the Ethics & Business Integrity team if we suspect a bribe.

## What if?

**Q:** I'm sourcing new suppliers. I spoke to a manager at a local supplier. He really wants to work with EGA and said that if I give them the contract, he will make sure I'm well rewarded. I'm not sure what he meant, and the contract award is not my decision to make, but the conversation made me feel uncomfortable. Should I do something?

**A:** Yes. It's important that you speak up. The manager offered you a bribe. This is illegal. You must follow company policy and report the matter immediately so appropriate action can be taken.

**Q:** I've submitted a licence application. An official at the licensing authority explained that there is a backlog, but they'll ensure the application is prioritised if I pay a small cash fee. The licence is business critical. Can I pay the fee?

**A:** No. This is a request for a type of bribe known as a facilitation payment. We do not pay bribes, even if 'business critical'. You must act with integrity and report the request to the Ethics & Business Integrity team.

## Where can I find out more?

- Anti-Bribery and Anti-Corruption Policy
- Talk to the Ethics & Business Integrity team

# Dealing with governments

## What matters to us?

We cannot do business without interacting with governments, so it is important to maintain open and constructive relationships. As there are additional risks associated with dealing with government entities (national, provincial and local governments) the rules that apply are stricter than those for commercial partners.

## What does this mean?

- We recognise that dealings with governments and **government officials** are subject to extra scrutiny, and even the allegation of corruption can result in serious reputational damage.
- We conduct ourselves with the highest ethical standards and comply with all applicable laws and regulations when dealing with government officials.
- We understand that hospitality practices that are acceptable in commercial business may be unacceptable, illegal, or viewed as potentially corrupt in government business. We never offer gifts or entertainment to a government official without obtaining prior approval from Legal, Ethics & Business Integrity.
- We continue to follow the company's global anti-corruption standards, even when local or regional hospitality practices are less strict.

## What if?

**Q:** I want to get permission for a new business in another country. Someone at the Ministry of Industry in that country tells me that the fastest way to get the necessary permissions is to offer them, and their boss, a 'small thank you gift'. My colleague thinks this is okay, because they did not ask for money, or anything of high value. Is it okay?

**A:** No, it is not okay. You must not give government officials any gift without discussing this with Government Relations and obtaining the prior approval of Government Relations and Legal, Ethics & Business Integrity.

## Where can I find out more?

- Anti-Bribery and Anti-Corruption Policy
- Gifts & Entertainment Policy
- Talk to Government Relations, Corporate Affairs, Legal or the Ethics & Business Integrity team



# Complying with international trade controls

## What matters to us?

As a global business, we are subject to international **trade controls**. Governments and international organisations implement trade controls (sanctions and embargoes) that restrict trade with specific countries, entities and people. Some impose a complete ban on trade; others may relate to the export and import of specific products, technologies and services. We comply with all applicable trade compliance laws and regulations.

## What does this mean?

- We understand that laws on international trade are complex and change frequently, so a transaction that was allowed in the past may not be allowed now. When unsure, we consult with Legal, Ethics & Business Integrity.
- We comply with our responsibilities under our sanctions compliance program.
- We do not enter into any agreement with a business partner which has not been on-boarded and screened against sanctions lists in accordance with our sanctions compliance program.
- We remain alert to red flags that may indicate a sanctions violation, scrutinising information received from business partners and transaction documents.
- We complete all assigned training on sanctions and export controls.



## What if?

**Q:** A supplier is refusing to provide ownership details requested as part of on-boarding. My manager has told me to get the material now and fix the paperwork later. Is this okay?

**A:** This is not okay. We need to understand who we do business with, so the supplier must complete the on-boarding process before we can do business with them. Do not try to get around internal controls and procedures (they are there for a reason!), and speak up if you are coming under pressure to do so.

**Q:** I'm dealing with a local company. The email address of my contact is in a sanctioned country. Should I report this?

**A:** Yes. This is a red flag and needs to be investigated immediately. Inform your manager and contact Legal, Ethics & Business Integrity.

## Where can I find out more?

- Sanctions Compliance Operating Policy and related departmental policies and procedures
- Talk to Legal, Ethics & Business Integrity

# Preventing money laundering

## What matters to us?

We value long-term business partnerships built on trust. We also recognise that criminals and terrorists could try to use us to conceal the illegal origin of their funds. Therefore we must take care to verify who we are dealing with and implement other controls to prevent **money laundering**.

## What does this mean?

- We follow internal **due diligence** procedures to verify that we are dealing with business partners engaged in legitimate and not criminal activities.
- We comply with our finance and anti-money laundering policies and maintain accurate records.
- We watch out for any unusual requests that could expose us to risk. We do not make or receive third party payments unless there is a justified business reason for doing so and proper due diligence has been completed in accordance with EGA policies.
- If we suspect money laundering or other illegality, we immediately report the issue to our manager and Legal, Ethics & Business Integrity.

## What if?

**Q:** A customer is asking to pay from a new account. The account is registered under a different company name and is in a different country. We know the customer well. Is this okay?

**A:** It is not okay. We must take great care with unusual payment requests. Payments made to or by someone who is not a party to the contract, payments from a different account to usual, payments from a different country, payments in a different currency to the contract, overpayments, or other suspicious arrangements could be a sign of money laundering. This is a process in which funds obtained from illegal activities (such as drugs, bribery, corruption, human trafficking etc.) are paid into a legitimate business. Red flags need to be investigated. Legitimate business partners will recognise our verification checks as an essential part of doing business. You must report this to your manager and Legal, Ethics & Business Integrity, who will advise you on how to proceed.

## Where can I find out more?

- Sanctions Compliance Operating Policy and related departmental policies and procedures
- Talk to Legal, Ethics & Business Integrity



## **Section 5:** Acting with integrity in our world

We have a bold aspiration to embed sustainability in everything we do. In this section of our Code, we explore how to apply our values in the wider world. Click on each topic below to find out more.



<b>Respecting human rights</b>	<b>38</b>
<b>Minimising our environmental footprint</b>	<b>40</b>
<b>Supporting communities</b>	<b>41</b>
<b>Lobbying and political activity</b>	<b>42</b>



# Respecting human rights

## What matters to us?

All humans, regardless of race, gender, nationality, ethnicity, language, religion, or other status, are entitled to basic rights based on the values of freedom, dignity, respect, fairness, equality, safety and health. We have a responsibility to respect and support human rights in our workplace and in the wider world. We conduct business in compliance with all applicable laws and requirements prescribed by industry initiatives of which we are a member. We strive to avoid having a negative impact on individuals, groups and communities that interact with our business operations, and to make a positive impact where we can. This commitment extends to every level of the value chain.

## What does this mean?

- We work to meet internationally recognised standards to the greatest extent allowed by applicable local laws and regulations.
- We are responsible for respecting and supporting human rights in our workplace, including the rights of our colleagues and contractors, and surrounding communities.
- We consider how our actions may impact the human rights of others.
- We ensure security operations are conducted in accordance with human rights principles.
- We conduct **due diligence** on business partners, and we expect our suppliers to follow the same human rights standards as we do.
- We contact the Responsible Sourcing team or the Ethics & Business Integrity team if we suspect that a business partner is using child labour, forced labour, engaging in human trafficking, disrespecting the rights of the community/indigenous groups or other human rights abuses (including non-payment of salaries, exploitative working hours, unsafe working conditions, use of violence or coercion, **discrimination**, expulsion of people from their lands etc.).

We encourage employees of our contractors and suppliers to speak up and report to us any human rights abuses using the Your Voice report line.

## What if?

**Q:** A co-worker, employed by a sub-contractor, told me that they don't get paid enough to cover rent and have to borrow money just to survive. I know they are paid on or above the legal minimum wage. Is this just a matter for the sub-contractor, or is there something I should do?

**A:** We should make sure that our employees and our sub-contractors' employees are paid sufficient funds to cover basic needs as well as save some money. Speak up and report this to the Ethics & Business Integrity team.



**Q:** I got my morning coffee from the on-site café. The servers told me that they have not been paid this month, but they can't leave their company because it keeps hold of their passports. I told my manager who agreed that it is an unfortunate situation, but as they work for another company I should not get involved. Is this right?

**A:** No, this is not right. We expect the companies we work with to respect basic labour standards. Not paying their employees, and withholding passports is not acceptable. Speak up and report the matter to the Ethics & Business Integrity team.

**Q:** A contact at a supplier told me that his company recently fired employees for raising concerns about inadequate safety equipment. Should I report this?

**A:** Yes. We expect our suppliers to look after the health and safety of their people. You should speak up and report the issue, and also encourage the supplier to report the issue on Your Voice.

#### Where can I find out more?

- Employee Handbook and Human Capital policies
- Responsible Sourcing Policy and Responsible Sourcing Standard
- Talk to the Sustainability team or the Ethics & Business Integrity team



# Minimising our environmental footprint

## What matters to us?

We recognise that mining and industrial processes can damage air, water, land and biodiversity if not managed responsibly. Working together, our operations, projects and environmental teams identify potential environmental risks and suitable controls. Our management plans set requirements for impact assessment, monitoring and suitable operating procedures to avoid and/or mitigate adverse impacts. Everyone has a part to play, and together, small acts can make a difference.

## What does this mean?

- We comply with all applicable laws, regulations, policies and environmental standards.
- We assess environmental risks and identify controls as part of the planning process on all projects. We are responsible for safeguarding the natural environment and ensuring appropriate controls and monitoring efforts are in place.
- We immediately report all spills, unusual emissions or waste, uncontrolled risks or environmental incidents to our line manager or environmental representatives, no matter how small.
- We look for ways to continuously improve our environmental performance by reducing our resource consumption (energy, raw materials, and water), emissions, effluents and waste.
- We protect the natural environment and respect the wildlife in and around all of our facilities.
- We are honest about our environmental performance and communicate openly about what we can do better, along with what we have done well.

## What if?

**Q:** I've been assigned a small, new project to increase productivity. I know this project may lead to higher emissions or waste, but I plan to deal with this after the implementation of the project. Is this okay?

**A:** No. It is your responsibility to assess the environmental impacts and ensure adequate controls and resources to mitigate the impacts. All projects must be assessed and approved prior to implementation. You can contact our Environmental team for support.

**Q:** I discover a snake, turtle or other wild animal on EGA's site. Is it okay to kill it or trap it and take it home?

**A:** It is not okay. In interfering with endangered or protected species you could be breaching local wildlife laws and/or damaging local ecosystems. If you discover any unusual animals in your work area, report it to the Environment team. If you consider the animal may be dangerous, immediately alert your Supervisor.

## Where can I find out more?

- Environmental policies including the Environmental Management System Manual
- Talk to the Environment team or the Ethics & Business Integrity team

# Supporting communities

## What matters to us?

We seek to make a positive long-term contribution to the communities in which we operate. We consider the social and economic impact of our business, and work with community representatives, government bodies, non-governmental organisations and educational institutions to maximise the benefits of our presence while mitigating potential adverse impacts. We recognise the importance of building trust through open communication, integrity and transparency.

## What does this mean?

- We respect our local communities and model EGA's values when living and working in our communities.
- We assess potential impacts to local communities as part of the planning process on all projects, and identify plans to alleviate, mitigate or compensate for the impact.
- We promote employment of local communities and create opportunities for local businesses to work with us.
- We run community engagement programmes, listen to community concerns, and respond honestly and transparently to those concerns.
- We recognise the importance of accountability and investigate and respond to grievances raised by affected communities objectively, fairly and constructively.
- We ensure charitable contributions are legal and appropriate.



## What if?

**Q:** I overhear a member of the community complaining about the noise and dust caused by our operations. Do I need to do anything?

**A:** Yes. Out of respect for our communities we must investigate promptly all grievances. Report the complaint so it can be investigated. Call any member of the Communities team in Guinea or +971 2 509 4535 in the UAE.

## Where can I find out more?

- Social Management System Manual
- Talk to the Communities team, Sustainability team or the Ethics & Business Integrity team

# Lobbying and political activity

## What matters to us?

As a leading international business, we engage with governments on matters relating to our operations. We do not make payments to a political party or politicians. Any lobbying activities must be authorised, comply with applicable laws and be consistent with EGA values. Whilst our people are free to participate in personal political activities (as allowed by local law), anyone doing so must be clear that they do not represent EGA.

## What does this mean?

- We do not make donations to political parties, politicians, or political foundations on behalf of EGA.
- We do not use EGA funds, time, or resources (including email, phones, paper etc.) to engage in personal political activities.
- When authorised to engage in lobbying on behalf of EGA, we comply with all applicable laws and conduct ourselves with integrity and transparency in all our dealings.
- If we take part in personal political activities, we make it clear that we do not represent EGA, ensure that we respect EGA's values and do nothing to damage EGA's reputation.
- If we are unclear what is covered by personal political activities and whether this is a possible conflict of interest we speak to the Ethics & Business Integrity team for guidance.

## What if?

**Q:** A local politician has asked us to re-build a road as he doesn't have the budget. He's keen to get it fixed before the upcoming election. Is it okay to re-build the road?

**A:** As a responsible company we monitor the impact of our work on local communities and look to mitigate any adverse impacts. We may consider re-building a road as a donation to the local community. However, we do not make political contributions, and there is a real corruption risk associated with a request like this. Report the approach to the Ethics & Business Integrity team so they can advise further.

**Q:** An election is coming. I would like to put up some posters at work. Is this okay?

**A:** It is not okay. You must not take part in any form of personal political activity at work. Any personal political activity must be in your own time, and you must make it clear that these are your own views, not ours.

## Where can I find out more?

- Anti-Bribery and Anti-Corruption policy
- Talk to Government Relations, Corporate Affairs or the Ethics & Business Integrity team





# Glossary

**Bribery:** offering, promising, requesting or agreeing to receive an advantage (this can include cash, gifts, gift vouchers, meals, entertainment, loans, discounts, or the unfair award of a business contract), which is intended to influence you or the person getting the advantage. It can also be a reward for acting improperly.

**Confidential information:** information that is only available to specified individuals and requires additional protection because its loss, or inappropriate disclosure, could harm EGA.

**Conflicts of interest:** any situation in which a person has a personal relationship or interest that has the potential to influence, or may appear to influence, their judgment or objectivity in carrying out their work for EGA.

**Discrimination:** unfair treatment of a person based on their social identity e.g., gender, age, culture, nationality, ethnicity, physical abilities, political and religious beliefs.

**Due diligence:** obtaining, verifying, and screening information on potential business partners.

**Facilitation payment:** a small, unofficial payment made to speed up routine governmental actions.

**Good faith:** acting in good faith means making a genuine effort to provide honest, complete, and accurate information.

**Government officials:** employees or agents of any government anywhere in the world, including low-ranking employees and employees of government agencies, state-owned entities, and commercial entities in which a government has a controlling interest. The term also includes political parties, officials and candidates, and employees of public international organisations like the United Nations, European Union, and Economic Community of West African States.

**Harassment:** unwelcome words, actions, or other behaviours that disrespect or belittle an individual or create a hostile, offensive or

intimidating work environment. Harassment is a form of discrimination. Some conduct may be considered harassment even if there was no intention to offend.

**Internal information:** information meant for internal EGA use that is not generally available to, or known by, the public.

**Intellectual property:** intangible and non-physical goods including patents, copyright, trademarks, trade secrets and other secret and confidential information that is not legally protected.

**Money laundering:** the process used by criminals to hide money or assets obtained from illegal activities by using them in legitimate business activity.

**Need to know:** co-workers have a “need to know” about information if they require access to that information to do their jobs. If you’re not sure whether someone has a “need to know” speak to your manager, Human Capital, or Ethics & Business Integrity.

**Personal Data:** includes any information that can be used to identify a living person. Personal data can be in any format (oral, written, electronic). Examples include name, address, birth date, phone number, email address, bank and payroll information, passport details, identity number, next of kin, photographs, IP addresses.

**Retaliation:** unjustified and adverse action against a co-worker in response to that person’s good faith report of an actual or suspected violation of our Code, policies, or legal requirements.

**Trade controls:** Prohibitions or restrictions on the trade or movement of goods, products, or services from, to or through a particular country, imposed by the government or relevant authority of a country.

Please refer to relevant EGA policies for more comprehensive definitions and explanations.