

# Supplier Code of Conduct



Qatalum's Supplier Code of Conduct is based upon internationally accepted and advocated principles for ethical and legally compliant business practices. Qatalum has a systematic approach to the application of its Supplier Code of Conduct in respect of its supply chain business partners, including suppliers, contractors, consultants and agents ("Business Partners"). In doing so, Qatalum's goal is to ensure that its business relationships are based upon a foundation of integrity and sustainability, and reflect the values and principles that Qatalum promotes internally and externally.

Qatalum expects that its Business Partners will comply with the principles set out in this Supplier Code of Conduct and will actively promote such principles with their own supply chain.

## 1. BUSINESS PRACTICES

### Compliance with laws

Business Partners will comply with all applicable laws and regulations.

### Corruption and Bribery

Business Partners will not engage or be complicit in, or encourage any activity, practice or conduct that would be an offence under, or breach of, any applicable laws relating to corruption and bribery.

Business Partners will not, in order to obtain or retain business or other advantage in the conduct of business, offer, promise or give anything of value or an undue advantage to a public official or to any third party to influence such person to act or refrain from acting in relation to the performance of her/his duties.

### Conflict of Interest

Business Partners will not request, accept or receive anything of value or an undue advantage that may influence their decisions, nor take part in or seek to influence any decision where there are related circumstances, factors or relationships (business, personal, economic or otherwise) that could give rise to an actual or perceived conflict of interest. If a conflict or risk of conflict of interest arises, Business Partners undertake to notify the Company immediately in writing of that conflict or risk and take any steps that Company reasonably requires to resolve the conflict or deal with the risk.

### Gifts

Business Partners will not offer, promise, give, request or accept gifts, favours or hospitality which are more than modest, both with respect to value and frequency, or are inappropriate with respect to time and place. Business Partners will not offer, give, request or accept any gifts, favours or hospitality whatsoever in connection with tender or contract negotiation/award processes.

### Improper Business Conduct

Business Partners will not enter into, seek to enter into or otherwise engage in any form of agreement, arrangement or activity that would be a breach of applicable competition laws and regulations.

## 2. WORKING CONDITIONS

### Forced Labour and Recruitment

Business Partners will not employ people against their will or use recruitment agencies who charge workers for recruitment. Workers shall not be charged any "start-up" costs, including but not limited to costs of pre-medical checks, obtaining Entry Visas, Residence Permit/Work Permit, Insurances or other similar expenses.

### Working Hours

Business Partners will comply with all applicable laws, regulations and agreements regarding working hours and overtime.

### Child Labour

Business Partners will not employ children except if such employment is expressly permissible according to applicable law. Business Partners will not employ persons below the age of 18 in any form of hazardous work.

### Document Retention

Business Partners will not require workers to lodge identity papers or deposits (financial or otherwise) as a condition of their employment.

### Employment Conditions

Business Partners will ensure a healthy, safe and secure working environment for workers. Business Partners will ensure that their workers are treated fairly and are not harassed or discriminated against.

Workers shall have opportunity to affect the safety of their working conditions and to register complaints.

### Wages

Workers will be paid in a timely manner (every month before the 5th of the month) and shall be issued pay slips. Business Partners shall comply with applicable laws and regulations (e.g. WPS in Qatar) and the relevant Embassy's guidelines for payment of salaries.

Basic salaries paid to workers shall be the greater of: (i) the basic salary offered to the worker at recruitment; (ii) the minimum basic salary specified by the relevant Embassy; (iii) the minimum basic salary, if any, mandated by Qatalum in the contract.

## 3. LOCAL COMMUNITY

### Qatar Specific Requirements

Qatar based Business Partners shall comply with the Qatalum Accommodation Guidelines. These Guidelines provide, among other things, minimum requirements for Accommodation, Food, Transport, Medical and Employee Insurance.

### Pollution and Emissions

Business Partners will seek to avoid pollution and to minimize emissions and waste production.

### Local Customs

Business Partners will respect local religious and cultural customs and the rights and integrity of local communities.