



# GFG ALLIANCE CODE OF CONDUCT



**GFG Alliance** is a champion of sustainable industry and this Code of Conduct helps us apply our values of Family, Change and Sustainability to everything we do across our business.

## **WE REQUIRE**

All GFG employees to understand the principles in this code and to conduct themselves in compliance with them as well as abiding by the applicable laws and regulations in the jurisdictions where we do business.

## **WE URGE**

All GFG employees to consider their actions and behaviour and act with integrity at all times to protect the guiding values of GFG.

## **WE SUPPORT**

Fair, responsible, and ethical business practices in the spirit of our values of Change, Family and Sustainability.

## **WE EXPECT**

All GFG employees to speak up and speak out and take the steps to do the right thing if there is a breach of this code or any laws, rules or regulations.

## **WE UPHOLD**

GFG Alliance's reputation by making the right decisions for the communities, economics, and environments we operate in.

**THE ALLIANCE IS STRUCTURED INTO THREE CORE INDUSTRY BRANDS:**



Independent of each other yet united through shared strategy, values and purpose to create a sustainable future for industry and society.



**WHILST THIS CODE CANNOT COVER EVERY EVENTUALITY, IT IS IMPORTANT TO NOTE THERE ARE RESOURCES AVAILABLE AT A LOCAL, AND INTERNATIONAL, LEVEL WHO YOU CAN CONTACT TO SEEK GUIDANCE AND CONSULTATION.**

This Code specifically addresses the following Standards which can be used by GFG employees as a guide to behavioural expectations.



### **ANTI-BRIBERY & CORRUPTION**

GFG Alliance opposes any form of bribery and corruption and requires strict compliance with global and national anti-bribery and corruption laws. GFG Alliance businesses and employees must act in accordance with policies and procedures and to act with integrity at all times. We will only engage with third parties that commit to our principles and expect all parties to have appropriate measures in place to prevent and combat all forms of bribery and corruption. There are accessible and confidential procedures throughout GFG Alliance businesses to assist with the disclosure of any misconduct, illegal or unethical conduct.

### **ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING ('AML & CTF')**

The GFG Global Compliance team seeks to ensure all GFG Alliance businesses and employees comply with laws, rules and regulations and further, takes precautions to ensure there is no illegal financial activity taking place within any of its businesses. In doing so, we do not support, facilitate, or permit any fraudulent activity, which includes money laundering and terrorist financing. All GFG Alliance businesses should undertake appropriate due diligence measures to ensure supply chains are free and clear of these kinds of activities.

### **SANCTIONS**

GFG Alliance businesses are expected to uphold business relations with countries, entities, and individuals that have no trade restrictions against them, including sanctions. Businesses are expected to screen third parties against applicable sanctions lists. Failure to comply with trade restrictions may damage our international reputation and result in penalties levied against us.

### **ENVIRONMENT, HEALTH & SAFETY**

Our commitment to sustainable business practices connects the way we operate in all of our businesses whether it is an office or a plant. We prioritise the health and safety of our employees through regular training and by providing regular updates as part of our Be GFG Safe programme. We are proud to share our ambition of becoming carbon neutral by 2030 by exploring new clean technologies built from our existing initiatives of GREENSTEEL and GREENALUMINIUM.

### **CONFLICT OF INTEREST**

Employees may take part in activities outside of their employment, for example, to give back to the community including non-for-profit engagements and professional body memberships. We foster and encourage a culture of transparency to ensure there is no conflict with the interests of GFG Alliance that could give rise to reputational damage or conflicts. Employees must not seek personal gain, or gain advantage for a relative or a friend, by misusing their role within the Alliance.

### **GIFTS & HOSPITALITY**

In line with global and national anti-bribery and corruption measures, we must take care not to accept or send any gifts or provide hospitality which may be perceived as preferential treatment. In the event we accept gifts from or send gifts to our external suppliers, they must be consistent with customary practices and within legislative guidelines.

### **CONTACTS**

Should you have any questions or queries about the content within the Code of Conduct, you may contact the GFG Global Compliance team at: [globalcompliance@gfgalliance.com](mailto:globalcompliance@gfgalliance.com)