

> Anti-corruption:code of conduct Aluminium Dunkerque ADK-USINE-ELT1-POL-0006-01



At Aluminium Dunkerque (ADIF, AD, ADS), we are proud of the aluminium we produce every day for our customers to high quality standards. We are even prouder of the way we produce this aluminium by constantly striving to meet ethical and compliance standards. The values expressed in this Anti-Corruption Code of Conduct are the ethical foundation of our company and respecting them is essential to its future. These values must guide each of us in our daily professional activities. Why? Because the fight against corruption is an essential element in maintaining healthy and lasting relationships with our suppliers, our historical partners and our customers. The rule is "zero tolerance" for these illegal practices. I therefore ask everyone, whatever their level, to be uncompromising in their respect for the rules set out in this Anti-Corruption Code of Conduct.



Guillaume De Goÿs,
Président of Aluminium Dunkerque



Aluminium Dunkerque has set itself the objective of actively combating all forms of corruption in its relations with third parties, including, but not limited to, active and passive corruption and influence peddling.

Any employee, manager, director or third party in a contractual relationship with Aluminium Dunkerque who commits or helps to commit acts of corruption is liable to fines and/or prison sentences, and dismissal. Furthermore, all of these acts may expose Aluminium Dunkerque to commercial or financial risks and/or administrative or criminal sanctions that could be extremely damaging and harm the Company's image and reputation.

With this in mind, Aluminium Dunkerque wanted to set up a specific code of conduct in the form of a guide to help each of its employees in their daily activities.

All employees are required to be aware of this policy and to participate in the training sessions that are periodically organized by Aluminium Dunkerque to raise their awareness of the fight against corruption. New employees are made aware of this as soon as they take up their duties. Each employee may, in fact, be confronted with many very diverse situations, of which it is not possible to establish an exhaustive list. However, this code aims to give the clearest and most complete picture possible of behaviour constituting corruption and influence peddling.

For everyone to recognize and identify acts of corruption, illustrations and explanations are provided based on the specific characteristics of Aluminium Dunkerque and its businesses.

In case of doubt, the employee should contact his or her line manager and, if necessary, the 5 referents (whose names and email addresses are listed at the end of this document) who have been designated by the company for these matters.



PREVENTION AND PROHIBITIONS OF PROHIBITED ACTS

The work carried out during the mapping of corruption risks gave us a clear picture of our risks and enabled us to put in place internal action plans, of which this Anti-Corruption Code of Conduct is a part.

Corruption	3
Influence pedding.....	3
Illustration of acts of corruption or influence pedding	4
Bribes.....	4
Gifts and invitations	4
Conflicts of interest	5
Donations to charities and sponsoring.....	6
Lobbying or interest representation	6
The financing of political life	7
Alert.....	7
Conclusion	8



PREVENTION AND PROHIBITIONS OF PROHIBITED ACTS

The work carried out during the mapping of corruption risks gave us a clear picture of our risks and enabled us to put in place internal action plans, of which this Anti-Corruption Code of Conduct is a part.

Corruption

Corruption may consist of soliciting or accepting, directly or indirectly, offers, promises, gifts, bribes, facilitation payments, invitations, services or any other advantage, for oneself or for another person, in order to perform or omit to perform an act within the scope of one's activity, function or mandate, or facilitated by one's activity, function, mission or mandate, thereby implying a violation of legal, contractual or professional rules.

Corruption is said to be "active" when it is the person who bribes who initiates the corruption.

Corruption can be public or private.

Corruption is said to be "public" when the bribe taker is a public official, i.e. any person holding public authority, entrusted with a public service mission, or invested with a public elective mandate. This includes public officials of the country in question or working on behalf of a foreign State or a public international organization (e.g. customs officials, competition, consumer affairs and fraud control officials, building permit officials, European Union officials and, in general, civil servants, law enforcement officials, public and ministerial officers, members of parliament, all local elected officials, etc.).

Corruption is called "private" when the bribe taker is not a public official. Private bribery is punishable by 5 years imprisonment and a fine of 500,000 euros.

Public corruption is punishable by 10 years imprisonment and a fine of one million euros. The mere fact of making a proposal or a promise is sufficient to constitute the offence.

For example

.....
 A minister asks for a job for his daughter in exchange for a decoration for the AD's collaborator who accepts

For example

.....
 Active influence peddling: A contractor gives money to a public official to influence the awarding of a public contract to the benefit of the contractor's cousin's company.

For example

.....
 An employee of AD asks a lobbying firm to offer undue advantages to a public official in exchange for his support in (permis, autorisation)

Influence peddling

Influence peddling applies to a relationship between three persons, in which one of them has real or supposed influence over another and uses this influence to obtain an advantage from a third person wishing to benefit from this influence. The penalties are like those prescribed for bribery. The mere fact of making a proposal or promise is sufficient to constitute the offense.

1. A private individual offers or gives to a person holding a public office to abuse his or her influence to obtain a favorable decision. The penalty in this case could be up to 10 years
 _ GOOD PRACTICE: If you are informed of a situation of corruption, you must do everything in your power to prevent it.

If you are not able to do so, you must notify your supervisor or, if this is not possible, use the Group's internal alert system. If you have any doubts about the situation, you can discuss it confidentially with your line manager or with the people designated to deal with the matter. A minister asks for a job for his daughter in exchange for a decoration for the AD's collaborator who accepts. Active influence peddling: A contractor gives money to a public official to influence the awarding of a public contract to the benefit of the contractor's cousin's company. An employee of AD asks a lobbying firm to offer undue advantages to a public official in exchange for his support in the negotiation of industries SOME EXAMPLES: 3 imprisonment and a fine of €1 million (or up to twice the amount of the proceeds from the offence).

2. A private individual abuses his influence in exchange for an advantage to obtain a favorable decision from the administration. The penalty in this case could be up to 5 years of imprisonment and a fine of €500,000 (or up to twice the amount of the proceeds from the offence)

Good practice

If you are informed of a situation of corruption, you must do everything in your power to prevent it. If you are not able to do so, you must notify your supervisor or, if this is not possible, use the Group's internal alert system. If you have any doubts about the situation, you can discuss it confidentially with your line manager or with the people designated to deal with the matter.



Illustration of acts of corruption or influence peddling

Bribes

It is strictly forbidden to pay or receive bribes or to consider doing so.

For example

.....
An agent of a sea freight forwarder offers to pay a small amount of cash to foreign customs to speed up the process of issuing a cargo authorization

Good practice

If you are informed of a situation of influence peddling, you must do everything in your power to prevent it. If you are unable to do so, you must notify your supervisor or, if this is not possible, use the Group's internal alert system. If you have any doubts about the situation, you can discuss it confidentially with your line manager or the compliance officers.

Gifts and invitations

Gifts and invitations offered by suppliers, service providers or subcontractors can contribute to the good quality of professional relations.

Offering, or being offered, meals, accommodations and entertainment (shows, concerts, sporting events, etc.) is considered an invitation. Employees should be careful with gifts and entertainment and be aware that they may be considered as a means of influencing a decision or favoring a company or person.

> Anti-corruption:code of conduct Aluminium Dunkerque ADK-USINE-ELT1-POL-0006-01

Gifts and invitations should not exceed the value of 150 Euros or an equivalent amount abroad and should be given at appropriate times, such as at the end of the year, or as a symbolic gift at the end of an important transaction. In all cases, a record of these gifts should be kept avoiding any future suspicion. In the case of repeated gifts or invitations from the same person or entity, the threshold to be retained is then assessed according to the total amount corresponding to the gifts and invitations received or offered in the same year.

We suggest that you consult the practical guide of the French Anti-Corruption Agency on this subject, below, concerning invitations and gifts.

<https://www.agence-francaise-anticorruption.gouv.fr/files/files/Guide%20pratique%20politique%20cadeaux%20et%20invitations.pdf>

Good practice

- Do not solicit gifts or invitations
- Forcing oneself to question the real or perceived purpose of gifts received
- Ensure that the maximum threshold of €150 of gifts per employee per year is not exceeded (except in the case of redistribution to teams)
- Do not offer or accept cash, vouchers or gift certificates

For example

.....
An employee receives a VIP invitation from a supplier to see an exhibition or a show for two people at the time of a tender. If the amount is 150 euros or more, it is essential to inform the employee's line manager.

An employee of AD offers to give a laminator in a situation of economic dependence undue advantages (gifts, invitations) in exchange for an amendment to the contract or a new order. The employee should not have made such a proposal, as it was inappropriate. The employee runs the risk of disciplinary sanctions in accordance with the SAPIN 2 Law and the company's internal regulations, up to and including dismissal for serious misconduct

Conflicts of interest

Conflicts of interest arise from any situation in which the personal interests of employees conflict with their duties or responsibilities. Such conflicts may arise in particular when the personal interests (pecuniary, family) of an officer or employee of a company, or of a third party acting in his or her name or on his or her behalf, are potentially or actually affected by a matter that he or she is dealing with in the course of his or her duties within the company.

We suggest that you consult the practical guide of the French Anti-Corruption Agency, below, to prevent conflicts of interest.

<https://www.agence-francaise-anticorruption.gouv.fr/fr/publication-guide-pratique-sur-prevention-des-conflits-dinterets-dans-lentreprise>

Sensitive activities include purchasing, sales, public affairs, financing (contributions, loans, grants, etc.), investments, and human resources management (recruitment, compensation, etc.).

Every employee should ask themselves:

- Do I have a special relationship (family, friend or professional) with the business partner I am discussing with?
- Can this situation affect my judgment in continuing our business relationship?
- Do I feel a sense of obligation because of this relationship with the third party?
- How would this situation be perceived by someone outside the company?

For example

.....
In the context of a purchasing process, the buyer in charge of the call for tenders calls upon a supplier whose member of the management is a close relative. The buyer is in a conflict of interest and must inform his line manager.

A manager is considering offering to hire a family member for a position in the unit he/she manages.

Donations to charities and sponsoring

Charities and sponsoring actions consist of financial or in-kind support for non-commercial purposes (philanthropic, humanitarian, social, cultural, etc.) for the benefit of events or organizations. These actions may only be carried out in the name or on behalf of the company within the strict framework provided by the company's internal policies and procedures. In particular, such actions are subject to prior authorization. They must be exclusively intended to promote the company's brand or image, its visibility, and be conducted only with and/or for the benefit of legitimate organizations whose reputation is not likely to be ethically challenged.

Good practice

- To carry out sponsorship and patronage actions whose purpose is in good faith and in line with the company's values
- Engage with organizations/agencies with established and verified recognition.
- Do not intervene at the request of a client/supplier or local partner without thorough verification.

Lobbying or interest representation

Lobbying is the act of entering into direct or indirect contact with a public official to promote the company's image or products, to influence a public decision, in particular the content of a law or a regulatory act. When its use is clear and transparent, this activity can contribute to the performance and positive reputation of the company. The interest representative (who is actively lobbying) may be an officer or employee of the company or a third party acting on its behalf under contract.

Interest representatives must make it clear to the persons they meet and to third parties that they are acting on behalf of the company and must take care to avoid any confusion with other activities that may be carried out in a private or professional capacity or within the framework of a mandate of any kind (association, political or trade union). In addition, interest representatives must comply with the applicable legislation, in particular, they must comply with the obligations to declare themselves to the national digital directory of interest representatives created by the High Authority for the Transparency of Public Life (HATVP), as well as submit an annual report on the actions carried out over the past year and the amount of the corresponding expenses.

For example

.....
The Energy Manager of Aluminium Dunkerque meets with a member of the Direction Générale des Entreprises to discuss the problem of rising electricity prices and proposes a campaign to the local deputies in order to have them vote for an amendment in a law, in favor of a ceiling on electricity prices. This approach is not prohibited but must be declared on the HATVP website. On the other hand, the direct influence of deputies by offering them a gift is forbidden (corruption)

Good practice

As soon as you have the slightest doubt about a possible conflict of interest, it is very important to share these situations with your management and, if necessary, the compliance officer.

- Identify real, apparent or potential conflicts of interest and inform your supervisor in writing.
- Do not get involved in group decision-making when it concerns an entity in which you or a family member has a private interest.
- Not to use one's position within the company, or information obtained in this context, for personal gain or that of one's family and friends.
- Do not systematically or abusively work with a supplier in which someone close to you has an interest



Anti-corruption: code of conduct Aluminium Dunkerque ADK-USINE-ELT1-POL-0006-01

The financing of political life

Aluminium Dunkerque respects the commitments of its employees who, as citizens, participate or wish to participate in public life. However, any employee concerned must refrain from making any moral or financial commitment to Aluminium Dunkerque or any of its entities in its activities. Similarly, any employee involved in the decisions of a State, a government agency or a public body must refrain from taking part in a decision of this body that would directly or indirectly interest Aluminium Dunkerque. Finally, and in line with this principle, Aluminium Dunkerque does not pay funds or provide services to any political party, nor to any holder of a public mandate or candidate for such a mandate.

Alert

The commission of acts of corruption or influence peddling is likely to have extremely serious legal (criminal and civil) and financial consequences for both the company and the employee who committed it. These acts are also likely to damage the reputation and the conduct of the business of the company found guilty of such offences.

Any employee who fails to comply with the provisions set forth in this Anti-Bribery Code of Conduct may be held liable in accordance with applicable law and may be subject to disciplinary action, up to and including dismissal.

Finally, the fact that an employee of the company turns a blind eye to an act of corruption committed by another person is likely to result in criminal and civil proceedings.

An internal alert system has been set up within the company with the aim, in particular, of combating the existence of illicit and/or prohibited behavior when an employee is confronted with abnormal practices and behavior as described in this Code. The employee must then be vigilant and report without delay the illegal and/or prohibited behavior he or she witnesses by sending an email from your professional email box to the address of one of the 5 referents who are at your disposal to help you on these subjects.

- Xavier Duroy de Suduiraut:
xavier.duroy@aluminiumdunkerque.fr
- Olivier Forato:
olivier.forato@aluminiumdunkerque.fr
- François Libier:
francois.libier@aluminiumdunkerque.fr
- Ludovic Prodhomme:
ludovic.prodhomme@aluminiumdunkerque.fr
- Yannick Vankemmel:
yannick.vankemmel@aluminiumdunkerque.fr

The employee will be able to express his doubts and/or ask questions if necessary in order to know: S'il est confronté à un risque de corruption

- If faced with a risk of corruption
- If it has a good faith belief that a violation of the Anti-Bribery Code of Conduct has occurred or is occurring or may occur;

If he or she discovers that someone is being retaliated against for making a good faith report. Any employee who reports in good faith and in a disinterested manner, i.e., with a sincere belief that his or her report is accurate, a violation or potential violation of the Anti-Bribery Code of Conduct to his or her supervisor or the Compliance Officer will be protected from all forms of retaliation.

His or her identity and the facts will be treated as confidential in accordance with applicable regulations. While an honest mistake will not result in any disciplinary action, deliberate misrepresentation or malicious misrepresentation will be subject to sanctions.

Aluminium Dunkerque's ethics and compliance documents are available on the website: aluminiumdunkerque.fr and on the Aluminium Dunkerque intranet. For any information or advice on ethics and compliance: please contact the Compliance Officer (contact details on the intranet). In accordance with article 17 of the Sapin 2 law, this Code is appended to the internal regulations of Aluminium Dunkerque (Service).

Conclusion

In conclusion, it is the responsibility of each employee to implement the anti-bribery code of conduct in the context of his or her job responsibilities. The company conducts periodic audits to verify compliance with the practices. The company's governance bodies regularly monitor the implementation of the code and the follow-up of alerts.