

**alumina**

## **Code of conduct**

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## **1. Basic provisions**

### **1.1. What is a business conduct code**

Code of business conduct was conceptualized aiming at establishing certain standards for all employees in Alumina doo. It does not regulate each situation that may occur, but it establishes basic principles that all employees should follow while performing their business duties.

The purpose of the Code is to instruct employees how to adjust their conduct to the work environment as well as to provide general guidelines to solve dilemmas they may encounter in the work environment.

### **1.2. Goal of the Code of conduct**

The Code aims at integrating the highest business standards with principles of employees' conduct that are in consistence with moral, ethical and professional norms and generally accepted values.

### **1.3. To whom the Code of conduct pertains**

Code of conduct pertains to all workers employed in the company „Alumina“ doo who are obliged to apply standards stipulated hereby in their conduct, since an individual's conduct in a work environment is not a private matter, rather making a generally accepted personal and professional duty of all employees.

### **1.4. The relation towards statutes and other legal acts**

Provisions defined by this Code shall not be contrary to statutes, decrees or ordinances. All employees of Alumina doo, in addition to the duty to observe statutes, decrees or ordinances, are also bound to observe company's internal bylaws.

### **1.5. Duty to comply with the Code of conduct**

All employees in Alumina doo are obliged to get familiar with provisions of this Code and to behave in accordance with it.

Provisions of the Code of conduct bind employees from the moment the employment relation or another type of hiring in Alumina doo begins, i.e., from the moment of signing a statement on informed consent to provisions of this Code by the employed or hired person.

Interpretation and application of this Code shall be performed by direct supervisors of the employees.

For any unclarity or problem that may arise in its application, employees should address their direct supervisors.

Direct supervisors have other duties, not only to monitor and perform the application of this Code, but to lead with their example as well. They are also obliged to help employees understand the Code as well as to stimulate them to seek assistance with regard to any issue or dilemma that they might have when it comes to the application of the Code.

The conduct of each and everyone of us is extremely important for Alumina doo's reputation, as we all reflect the institution we work in. Therefore, each employee is obliged to accept its standards and to apply the principles prescribed by this Code in their conduct.

## **1.6. Consequences and the procedure in case of failure to comply with the Code of conduct**

Any conduct by employees that is in contravention with provisions of this Code shall be deemed failure to comply with the work discipline, which will be sanctioned in accordance with internal bylaws regulating the subject area.

## **2. Organizational management**

### **2.1. Decision making process and structure**

Decision-making process was entrusted to management bodies in Alumina doo and it should promote ethical conduct, responsibility and transparency. The method of decision-making and carrying out and executing decisions is applied in accordance with the hierarchy, i.e. organizational structure.

Direct supervisors have essential role in providing answers to questions and adequate problem solving, as well as to inform workers within their mandate about the rules of the Code of conduct.

Sustainable business success is created through application of rules of conduct stipulated in this Code. One's colleagues are to be treated with care and respect and so that an example is created for others.

All employees in performing their professional tasks are to act with professionalism, responsibility, diligence and persistence, tending to solve any difficulties they may encounter in their work in an appropriate manner that is in accordance with procedures planned for that realm of work, always displaying initiative.

In case that an employee cannot respond to their duties at work due to temporary reduction of working ability, personal problems or any other reason, he/she is obliged to notify their direct supervisor who will tend to harmonize the urgent situation with the business requirements.

Supervisors shall monitor employees' work continuously, recognize and direct their work potentials, stimulate innovation, act to prevent possible problematic, conflicting situations and observe dignity of each employee.

All employees shall observe hierarchy and organizational structure of the Organization and act within their powers and responsibilities and promote with their overall conduct the overall discipline and the efficient functioning of the system.

## **3. Human rights**

### **3.1. Basic principles and labor rights**

Human rights listed in the UN Charter of Human Rights shall always be the basis of our activity, which is inter alia to include:

- prevention of all forms of child labor and forced labor
- adequate compensation in accordance with applicable laws and regulations;
- protection of employees from all forms of abuse;
- right to equal opportunities and freedom from discrimination;
- right to free association;

- observing all human rights.

Each employee has the right to fair treatment, politeness and respect. Therefore, each employee is expected to treat their colleagues and third parties with respect, equity, politeness and professionalism.

### **3.2. Prohibition of discrimination**

Discrimination is prohibited when hiring and employing a worker on any basis, such as racial discrimination, discrimination on the basis of gender, ethnic affiliation, color of skin, age, religion, origin, sexual orientation, political attitudes, marital or physical status.

Any form of psychic, physical, sexual or verbal abuse, intimidation or threats shall not be tolerated.

Action in accordance with the law shall be taken against any employee who takes part in discrimination, harassment, social exclusion, or any other violation of dignity and respect toward an employee at their workplace.

### **3.3. Right to free association – trade union**

Directly or through their representatives, employees are entitled to association, participation in negotiations for conclusion of collective agreement, peaceful resolution of collective and individual labor disputes, consulting, information and expression of their positions on relevant issues related to work.

## **4. Work practice**

### **4.1. Employment and labor relations**

Obligations toward employed workers shall be in accordance with statutes that regulate the subject area. Each type of work ought to be voluntary and workers shall be free to terminate their employment with timely notice.

### **4.2. Work hours**

Work hours are defined by Rulebook on work and other rules and regulations of Alumina doo. Full work hours count 40 hours per week.

A worker may enter into a full-time work contract with one employer only.

### **4.3. Observing defined deadlines**

Superiors in hierarchy are obliged to determine task performers, to assign appropriate deadlines to perform the work task, to supervise its performance and take part if necessary, should circumstances arise that hinder task performance by workers within the given deadline. Employed workers are obliged to perform work tasks in accordance with the agreed deadline and work dynamics.

#### **4.4. Keeping trade secrets and confidential information**

Workers having the access to information deemed to be company's trade secrets, who utilize or keep them, are obliged to treat them in accordance with statutes, decrees and ordinances that regulate protection of secret information and, in this regard, to disable unauthorized disclosure, destruction and abuse thereof.

Employees shall treat confidential information with responsibility and conscience and utilize them in their work according to their powers exclusively. The list of information, business books, documents and deeds that have status of company's trade secrets, are determined by a Decision of the company's authorized person.

If the employed worker is not sure if confidential information or document is concerned or whether he/she has authorization to access them, utilize or forward them, they shall seek instruction from direct supervisors or persons responsible for professional information management.

When compiling private information about employees, observing the right to privacy is mandatory.

#### **4.5. Dress code**

Corporate culture dress code implies awareness of the fact that regardless what their job might be, each employee makes impression not only of themselves with his/her general appearance but as well of Alumina doo as the employer. Workers should be dressed appropriately and neatly, and their clothes and shoes should be in accordance with generally accepted professional standards. While performing business tasks and during work hours, wearing personal protection equipment is mandatory, including protective work clothes, shoes and prescribed equipment, for those workplaces where regulations require so. It is not allowed to carry or utilize protective clothes, shoes and equipment one is charged with outside Alumina doo.

The rules related to suitable clothing are regulated in more detail with Decision on dress code in work environment.

One is to heed particular attention to clothing for official business events, attendance to important meetings and during any public representation of Alumina doo.

#### **4.6. Use of mobile phones**

Use of cell phones is regulated with decision of the Authorized person, in order to utilize advantages of their use while minimizing potential risks, hazards and harmful effects that may arise due to insufficient attention, as well as accidental and harmful situations that might be caused by uncontrolled use of cell phones. Defining the mode of cell phone utilization serves to act preventively on problems (various accidents and injuries) that might arise as effects of reckless or too extensive utilization thereof.

During work hours, any negligent use of telephones that would breach rules of work safety and confidentiality of data is prohibited.

Workers are prohibited to use cell phones (private or business one) within the factory ground / at their workplace in any way detrimental to the employer's reputation or neglecting one's work duties.



#### **4.7. Treatment of Alumina doo property**

Employed workers and other hired persons are obliged to manage the Alumina doo property as in a good businessman practice and in accordance with ethical principles.

In daily work and operation, the treatment of the Alumina doo property must be rational so as to realize optimum business results.

Employed workers have a duty to preserve the value of assets entrusted to them and to protect the Alumina doo property while avoiding actions that might endanger the integrity and safety of the properties.

#### **4.8. Protection of occupational health and safety**

Alumina doo primary concern is the protection of health, safety and security of employed workers, because efficient and quality job performance is only possible in a protected work environment that is not harmful for health.

It is our shared responsibility to achieve this goal.

Our health is the foundation of good quality of work and living, therefore necessary precautionary actions are to be taken in that regard, in order to prevent work related injuries and occupational disease.

Employed workers are expected to adhere to all safety rules and procedures of health protection during the course of work and always when they are within the factory grounds, permanently striving to promote the work process so that we could together ensure work related health and safety, as one of our core values.

Each safety problem must be handled immediately. That is why, in cases when an employee is not able to solve the problem on his own, he/she is required to report each potential hazard to his/her direct supervisor and the Occupational health and safety protection section as soon as possible.

Employed workers are expected to take care of themselves as well as of each other by observing all rules and procedures.

Maintaining safety is our collective responsibility and everyone of us in Alumina doo has an important role in doing so. Anything we do we must do safely, so, in this regard, risks are to be assessed and controlled regularly up to acceptable extent, so as to prevent any kind of injury and health risks of employed workers and any other person happening to be in Alumina doo (business partners, contractors, visitors and others).

Rules of conduct for third persons that happen to be in Alumina doo on any basis are regulated with Code of conduct of third persons within the Company.

#### **4.9. Professional development of employees**

Acquiring new knowledge and betterment of existing know-hows, skills and abilities is a duty of all employees in Alumina doo.

All employees, particularly managers, render professional assistance and support in learning to young and new employees. Transfer of knowledge and exchange of experience among employees are very important for increase of total potentials and values.

Alumina doo is committed to support employees in permanent increase of their knowledge. Employees cooperate in various forms of education and training. That upholds and maintains the level of professionalism in all areas which helps us keep the pace with general progress worldwide.





#### **4.10. Personal development of employees**

Aspiration toward development of personal potentials, abilities and talents, as well as realization of goals in various segments of living, is a feature of successful and content people, therefore Alumina doo supports it employees in realization of their personal and family goals, with the purpose of their qualitative and quantitative contribution to realization of business goals.

Alumina doo is committed to working on provision of conditions that facilitate employees' realization of their goals, taking care of employees' needs after work hours such as rest and recuperation, sports activities etc.

### **5. Forms of conduct unacceptable in work environment**

#### **5.1. Destructive conduct**

All forms of physical and emotional abuse are strictly prohibited as they threaten security, integrity and dignity of person, make the work environment unsuitable for quality work, severely hamper interpersonal relations, and consequences of which often have lasting negative effect on an individual, as well as on his immediate surrounding.

Threats, vulgar expressions, tantrums, insults and belittling, verbal and physical assaults, sexual harassment, mobbing as well as other forms of violent behaviours are impermissible.

#### **5.2. Smoking, alcohol, drugs and weapons**

In order to protect non-smokers from harmful effects of smoking, special premises for smoking are designated in Alumina doo, separate from non-smoking area, to the benefit of employees.

Employed workers are prohibited to work and to come to work under the influence of alcohol, as well as to bring in alcohol liquors and consume them at one's workplace. They are obliged to such behaviour that no previously mentioned prohibition is breached. Each act contrary to the prohibition shall be deemed a violation of work discipline. Rules of conduct related to alcohol are regulated in more details with the Decision on procedure of determining concentration of alcohol in one's organism.

It is prohibited to bring in, spread and use all sorts of narcotic drugs and psychotropic substances at one's workplace.

Except persons who are members of the factory security of Alumina doo, employees are prohibited to bring in, hold or use any kind of weapons.

#### **5.3. Conflict of interests, bribery and corruption**

Employees shall not participate in financial and other activities that may harm the business operations, name and interests of Alumina doo, as well as in cases in which there is a conflict between personal and business interests. Employees shall not engage during work hours in any activity that are any sort of competition to any segment of business of Alumina doo. Equipment, information and other assets of Alumina doo shall be utilized in the interest of the company exclusively.

Alumina doo does not participate in bad and corrupt business deals with any third party, to include clients, agents, distributors, suppliers and subcontractors. We carry out adequate due diligence and we get to know all third parties we make business with.



Alumina doo does not give or accept bribes or commissions. It also does not pay any benefits (non-official payments or favours for public officers so as to get approvals /permits or facilitate a business transaction or activity in any other way).

Alumina doo complies with its statutory obligation concerning annual reporting to Ministry of Justice on eventual complaints about corrupt practices.

## **6. Mutual business relations**

### **6.1. Cooperation, respect and trust**

Employees nurture mutual trust and respect with each other and thereby build a basis of a quality business relation. They develop personal sense of responsibility in workers for quality of performed business tasks. Offering professional assistance, consulting, exchange of information and open circulation of information have crucial impact on developing a sense of togetherness, both in relation between departments, sections and spatially separate organizational units, and in the whole business system of Alumina doo.

Employees view facts and situations from different perspectives and that way they contribute to raising work and professional level of business operations which is why they are stimulated to teamwork, full cooperation, multidisciplinary and multi-sectoral approach in various business tasks. Alumina doo stimulate initiative and creativity thus improving the business.

### **6.2. Relation of senior staff toward employees**

Senior staff serve as a good example to employees, with their work engagement, exemplary conduct and adherence to laws, moral and ethical principles. They build their authority on their competence and realization of top business results. In their treatment of employees, a senior (managerial) member of staff is with no exception fair and just. Managers incite team work and identify abilities of each individual to render maximal contribution in realization of Alumina doo goals. They respect the person of their inferiors and they communicate timely and with arguments eventual objections to work or conduct of employees, with inevitable suggestions for ways to overcome them.

### **6.3. Relation of employed workers towards managerial staff**

The relation of employees toward managerial staff is based on mutual respect and esteem.

Employees are encouraged and stimulated to point to senior staff on possibilities of a more successful and efficient realization of work tasks entrusted to them, aiming at better business results of Alumina doo. Eventual problems are solved in benevolent, direct and specified communication between those concerned with a problem, and should that not be possible, persons at workplaces with a higher level of responsibility are assigned to handle the problems.

### **6.4. Fair interpersonal relations**

Employees found their conduct in work environment on mutual cooperation, trust, fairness, as well as respect of dignity, reputation and personal and professional integrity, they avoid conflicts and take active part in the prevention of conflict situations. They also contribute to raising work and professional



level of business, exchange and open circulation of information, as well as rendering professional assistance.

Developing sense of togetherness at all levels is particularly important.

### **6.5. Communication**

In everyday communication, employed workers are expected to display conduct in accordance with business communicating culture, which implies clear communication and esteem for one's interlocutor, as well as use of understandable terminology. This means expression without use of cursing, inappropriate language or shouting.

Whether it is internal or external, verbal or written communication, it shall be based on professionalism in accordance with business etiquette, with esteem for one's superior/ colleague / business partner.

Each employee should be representing in business manners and professionalism, so that communication in accordance with that should be timely, clear, concise and efficient.

## **7. Environment protection**

In performing its business tasks, Alumina doo takes heed on the environment protection, reduction of raw materials consumption, optimization of the production processes and reduction of waste. Alumina doo shall not produce or place to market any product presenting unacceptable risk for health and the environment.

Responsibility and care toward the environment and safe use of chemicals reflect in observance of legal regulations from these areas at the state / entity as well as international level. In addition to that, each employee is informed about internal acts in the area of environment protection, work and handling of dangerous chemicals which they are obliged to respect.

We take continuous heed on the emission of pollutants into water, air and soil.

We utilize energy products rationally, raw materials and other resources, necessary for production processes. We prevent uncontrolled pouring of hazardous substances into water and soil, with adequate handling of chemicals, and we provide adequate sanitation in case of accidents.

In case of accidental situations we timely inform the authorized institutions on the events that might affect the environment pollution and that may bring about hazards for people's lives.

We display social responsibility toward the environment through raising awareness on minimization of producing waste as well as continuous sorting and keeping of waste.

Alumina doo is committed to utilization of renewable energy sources and increase of energy related efficiency, with the purpose of reducing gas emissions with greenhouse effect.

## **8. Relations with business partners**

### **8.1. Communication with business partners**

Business communication is one of key business skills that needs to be constantly perfected by business people and employees, thus bettering business results. Successful communication should satisfy both business counterparts, so mutual understanding and respect are necessary in business

communicating. The goal of business communication is first of all reaching understanding, conveyance of messages, information and experiences.

In business communication, it is very important to define the goal of communication, as business results will depend on a clearly set goal.

In verbal business communication, employees should speak clearly and precisely using adequate terminology for the subject that the listener, i.e. interlocutor is familiar with. They should use positive speech, treat the interlocutor with due respect, adhering to the business agreements and deadlines in order to solve problems.

Written communication has the purpose to solve certain business task and it implies clarity, conciseness and precision. Written business communication is realized through various forms, reports and other types of communication. Written communication needs to be built with a simple style and understandable vocabulary that needs to be clear, understandable, polite, timely, complete, individual and formal.

All written queries and requests are to be responded timely and as soon as possible, and in case when it is not possible to give timely response, an apology is to be sent explaining the reason why the response is delayed.

No belittling of the other business counterpart should occur in written or verbal business communication, which might have negative impact on future relations.

## **8.2. Business meetings standards**

Employed workers, depending on their assigned workplace and job description, may organize meetings with business partners/third parties with obtained consent of their superiors. The consent may be in electronic or verbal form.

In organization of or participation in a business meeting, it is important for the employee in charge of the meeting to determine the goal he wants to achieve, and to notify other participants to the meeting about it. After the business meeting, the employee in charge of the meeting delivers to other participants the minutes of the meeting with proposals and conclusions as well as eventual defined duties /deadlines. The minutes might be in electronic form (email) or hard copy.

Minutes of business meetings must be delivered to one's superior, and / or, depending on the subject of the meeting, to the Authorized person's assistants and the Authorized person.

## **9. Relations with media and government bodies**

### **9.1. Relations with media and authorities**

The person in charge of communication with media is the Press and public relations officer, from the Secretariat department, who conceptualizes and realizes the overall communication strategy, with approval of the Alumina doo Authorized person or the person he empowers. The Press and public relations officer also organizes press conferences, takes care of reception of journalists and other representatives of media who come to Alumina doo, prepares press releases and takes care of other forms of communication.

Other employees other than the Authorized person and the Authorized person assistant are not allowed to make public appearances before Alumina doo, unless having obtained previous approval to do so.

## 9.2. Relations with government bodies and institutions

Alumina doo provides requested information to government bodies and institutions where there is an obligation to do so in accordance with a statute, contract or other legal acts.

## 9.3. Relations with local community

Alumina doo has been helping the local community since its very first day in all segments of life and work. We tend to keep an open dialogue with neighbors, citizens and politicians, as well as with any other interested parties.

Alumina doo strives to contribute with its activities to all areas of local community development. There are numerous long-term examples of philanthropic and socially responsible activity: it has been helping schools, health institutions, cultural centers, sports organizations, and it has been supporting regularly all activities on advancement of the local community, thereby manifesting its commitment to advancement of the society.

## 10. Final provisions

### 10.1. Publicity of the Code of conduct

Code of conduct is public and it shall be published on Alumina doo bulletin board and it shall be delivered to each employed worker.

### 10.2. Effectiveness

Code of conduct comes into effect as of the day of its adoption.

Date: 05/05/23

Authorized person

Zoran Stevanović