

## **GAC's Anti-Bribery and Anti-Corruption Compliance Programme**

Guinea Alumina Corporation (**GAC**) takes anti-bribery and anti-corruption (**ABAC**) compliance seriously. We are committed to conducting our business in an honest and ethical manner, complying with all relevant laws, rules and regulations governing bribery and corruption, and following best practice in ABAC compliance. Bribery not only undermines the rule of law and the principle of free and fair competition, but it also has a corrosive and stifling effect on the development of businesses and commerce. GAC's ABAC compliance programme provides a strong and practical ABAC framework so that we can play our role in eradicating bribery and corruption.

### **GAC's Standards**

As an EGA company, GAC has a zero tolerance approach to bribery in all of our business dealings and relationships, and this approach is clearly stated in our Code of Conduct and internal policies and procedures. GAC's management takes a leading role in ensuring that our ABAC policy is understood and followed.

Our policy prohibits bribery, including facilitation payments. It also includes clear guidance as to the offering and accepting of gifts, hospitality and entertainment, donations and dealings with third parties, including government officials.

There are serious consequences for any breaches of our policy, not only for our employees, but for anyone providing services for or on behalf of GAC.

### **Risk Assessments**

Risk assessments are a key part of an effective ABAC programme. They allow GAC to identify and focus its efforts on the business areas with the highest risk of bribery and corruption. GAC's General Counsel and EGA's General Counsel for Compliance oversee regular ABAC risk assessments, and the executives that head the various functions agree on actions to be taken to mitigate the risks identified.

### **Third Party Dealings**

GAC acknowledges the importance of carrying out due diligence on those that perform services for us, or on our behalf. This due diligence is proportionate to the level of risk presented by each third party. Third parties must also agree to comply with GAC's expectations in relation to ABAC compliance. GAC will take appropriate remedial action if third parties do not act with the level of integrity which we expect.

### **Training and Awareness**

Our employees receive on-line, and face-to-face ABAC training, overseen by our Compliance team. This is tailored to focus on the corruption risks which they are most likely to encounter in their particular role. ABAC training is also provided as part of the induction process for all workers at GAC. We do this to establish firmly and maintain GAC's strict ABAC culture throughout the company, from senior management downwards.

### **Reporting Concerns**

GAC encourages people to report any suspected bribery and corruption, including any requests received for improper payments. We encourage employees to raise concerns as early as possible with their supervisor, and anyone can report concerns to the Compliance team, or through Your Voice, our independently run report line (on which it is possible to remain anonymous). The contact details for Your Voice appear on EGA's web site [www.ega.ae](http://www.ega.ae).

GAC's Compliance team investigates all reports that it receives direct or through Your Voice. GAC has a strict policy of non-retaliation, so anyone reporting a concern in good faith is assured that they will be supported, regardless of the outcome of their report.

**Monitoring and Review**

The Compliance team monitors and reviews all aspects of GAC's ABAC programme, to ensure it remains proportionate and effective, and provides regular updates to GAC's management.