



Responsible Sourcing Standard



Guinea Alumina Corporation is committed to being a responsible business, including responsibly sourcing goods and services. This a Responsible Sourcing Standard describes the expectations we have of our suppliers and has been developed in accordance with our Code of Ethics <https://www.gacguinee.com/en/sustainability/governance> and our values:



Safety & sustainability



Integrity & fairness



Ownership & teamwork



Innovation & continuous improvement

GAC requires you as our supplier to confirm that you have read and understood this Responsible Sourcing Standard. We expect you to uphold these standards and communicate these or equivalent expectations to your employees, suppliers and business partners. We reserve the right to cease to work with suppliers who do not meet our expectations.

By continuing to supply goods and provide services to GAC, the provisions of this Responsible Sourcing Standard become part of your agreement(s) with GAC and are deemed to be incorporated in the agreement(s) by reference.

GAC 's Code of Ethics and our values require on-going assessment of the risks and standards in GAC 's supply chain.

We require you to provide all reasonable assistance if GAC (or a third-party mandated by GAC), upon due notice, requests to visit your facilities to audit your compliance with this Responsible Sourcing Standard and/or the quality of materials and/or services supplied to GAC .

Requirements for business conduct

Compliance with law

Suppliers shall comply with all applicable laws and regulations in the countries and jurisdictions in which they operate. Where there is an inconsistency between these Standard and applicable laws and regulations, suppliers shall follow the higher standard. Suppliers shall maintain accurate books and records in compliance with applicable laws and regulations.

Trade sanctions and Export Controls

Suppliers shall comply with all applicable trade sanctions and export controls.

Anti-bribery, anti-corruption and anti-money-laundering

Suppliers shall have zero tolerance for bribery, corruption and money laundering. Suppliers shall not offer, promise, give or accept any bribe or other improper advantage that attempts to improperly gain a business advantage or influence a business decision. This applies regardless of whether the advantage is offered directly or through an intermediary.

Any gifts or entertainment offered to GAC 's employees and representatives must be modest and appropriate, with respect to the parties involved, value, frequency, time and place. Gifts, entertainment, or other favors must not be offered or received in connection with contract bidding, evaluation or award.

Conflicts of interest

Suppliers shall not take part in or seek to influence any decision that could give rise to an actual or perceived conflict of interest with their responsibilities to GAC. If suppliers believe there is an actual, potential or perceived conflict they shall promptly disclose the conflict in writing to GAC.

Competition

Suppliers shall compete in a fair manner. Suppliers shall not enter into agreements with competitors that could breach antitrust laws and regulations or collude with other tenderers, suppliers or contractors or engage in any other form of anti-competitive behaviour.

Counterfeit Goods

Suppliers shall implement policies and procedures that ensure that their supply chain is secure from tampered or counterfeit parts.

Confidentiality

Suppliers shall safeguard GAC 's confidential information by keeping it secure and limiting access. Suppliers shall respect GAC 's property, (including intellectual property) and not act in a manner inconsistent with GAC's rights.

Data Protection and Data Security

Suppliers shall comply with applicable data protection legislation and data security legislation.

Requirements for the workplace

Employment conditions

Suppliers shall only employ or contract workers who are legally authorised to carry out the work they do. Suppliers shall clearly communicate the terms and conditions of employment to workers in a language that they understand.

Wages shall be no less than the prescribed legal or industry minimum wage. Suppliers should pay a living wage. Payments must be timely, in legal tender and fully documented in compliance with wage laws.

Suppliers shall comply with legal requirements for working hours, public holidays and annual leave. All work, including overtime, must be voluntary.

Child labour

Suppliers shall only employ workers who are at least 18 years of age, or the applicable minimum legal age, whichever is higher. Suppliers shall ensure that workers under the age of 18 do not perform hazardous or night work.

Forced labour

Suppliers shall ensure that all work is voluntary and shall not use any form of slave, forced, bonded, indentured or involuntary prison labour. Workers shall not be required to lodge “security deposits”, identity or travel documents as a condition for employment or accommodation.

Discrimination and harassment

Suppliers shall not tolerate any form of discrimination or harassment based on personal characteristics (such as race, gender or religion). Suppliers shall treat employees, contract workers and people with whom they do business with dignity and respect. Suppliers are encouraged to offer equal opportunities to all in employment practices, unless there are overriding societal priorities such as employment localisation or the promotion of gender diversity. Suppliers shall not tolerate corporal punishment, mental, sexual or physical coercion, harassment, discrimination and retaliation. Suppliers shall ensure grievances can be raised without fear of retaliation.

Women in the workplace

Suppliers shall implement a programme that promotes gender equity and women’s empowerment in employment practices, training opportunities, awarding of contracts, processes of engagement and management activities. Suppliers shall review the programme at least every five years.

Freedom of association and collective bargaining

Suppliers shall respect the rights of employees to form or join unions or other associations to collectively bargain within the bounds of applicable law. Where this right does not exist, suppliers shall promote the involvement of employees in industrial relations through alternative means of association that are permitted by law.

Occupational health and safety

Suppliers shall provide a safe, healthy and secure workplace, and take measures to identify hazards and prevent or minimise the risks of accidents, disease or incidents. Suppliers shall ensure employees undergo sufficient health and safety training.

Whistleblowing

Suppliers shall ensure that they have appropriate reporting mechanism in place for personnel to raise concerns.



Requirements for protecting communities and the environment

Respecting communities, indigenous rights and cultural heritage. Suppliers shall identify and document risks to communities resulting from their operations on a regular and ongoing basis and take appropriate steps to prevent and address adverse impacts on local livelihoods resulting from their activities. Community risks include issues relating to:

- Legal and customary rights
- Interests of local communities in their lands and livelihoods and their use of natural resources
- The rights and interests of Indigenous Peoples
- Sacred or cultural heritage sites
- Displacement and resettlement.

Suppliers shall pay particular attention to impacts on the poor and vulnerable, including women. When changes to operations may impact Indigenous Peoples, suppliers shall seek free, prior and informed consent.

Security arrangements

Suppliers shall ensure that the provision of security to their operations and their engagement with public and private security forces is consistent with the laws of the relevant country and relevant international standards and guidelines, such as the Voluntary Principles on Security and Human Rights.

Protecting the environment

Suppliers shall identify and document environmental risks resulting from their operations on a regular and ongoing basis and implement suitable controls to mitigate identified impacts. Environmental risks that may result from supplier operations and should be included in risk assessments include issues relating to:

- Biodiversity and soil quality
- Water quality and consumption
- Air quality
- Greenhouse Gas Emissions and Decarbonization
- Noise emissions
- Sustainable natural resource management
- Energy Efficiency and Renewable Energy
- Waste management, reuse and recycling
- Safe handling and disposal of hazardous chemicals and substances.

Requirements for implementing a due diligence management system

Suppliers shall develop a due diligence management system for responsible business conduct that sufficiently identifies and manages the risks included in this standard, and is appropriate for the scale and scope of the organisation. For larger organisations, this will include establishing:

- Policy commitments in line with the requirements in this Standard and a strong management system that has clear roles and accountabilities
- A risk assessment process that identifies the environmental and social risks included in this Standard
- A risk management process to mitigate and address identified risks and impacts
- A process for reviewing the effectiveness of the due diligence programme
- Annual public reporting cycles on the due diligence programme.

Suppliers (including any subcontractors and third-party employment agencies) shall:

- Conduct their business in a manner consistent with this Responsible Sourcing Standard
- Require their suppliers to meet the expectations in this Standard
- Require their suppliers to communicate these requirements to their suppliers.



Requirements for sourcing minerals

Requirements for suppliers of metals and minerals

Suppliers of metals and minerals shall follow the recommendations in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance) and require their suppliers to undertake due diligence in accordance with the OECD Guidance. Suppliers of minerals and metals shall be committed to identifying, assessing and responding to risks in conflict-affected and highrisk areas (CAHRAs) and shall not tolerate the use of minerals associated with the following:

- Serious abuses (such as torture, cruel, inhuman and degrading treatment; forced or compulsory labour; child labour; human rights violations and abuses such as sexual violence; war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide)
- Direct or indirect support to non-state armed groups
- Direct or indirect support to public or private security forces
- Bribery and fraudulent misrepresentation of the origin of minerals
- Money laundering
- Non-payment of taxes, fees and royalties to governments.

Suppliers shall undertake risk-based due diligence in line with the recommendations of the OECD Guidance. Suppliers shall assess their own activities and the activities of their suppliers against the standards set out in this Standard.

Reporting your concerns (Your Voice)

GAC encourages you to speak up and report any concern (including any suspected violation of law or GAC 's values, Code of Ethics or this Responsible Sourcing Standard). *Your Voice* is a confidential report line for employees, suppliers and the general public to report a concern. The service is available 24/7 in multiple languages and includes an option to remain anonymous.

You can access the *Your Voice* report line at <http://www.ega.ethicspoint.com> or use a toll-free phone number:

- **8123** in the Republic of Guinea.
- **8000 021** in the UAE; Quote the code: 855-689-1296.
- See the **EthicsPoint** web site for toll-free numbers in other countries).

Please email responsiblesourcing@ega.ae with any general questions about this Responsible Sourcing Standard.

Guinea Alumina Corporation S.A.