



Business Partner

Code of Conduct Policy

Business Partner

Code of Conduct

TAHA International is a leading, highly technologically innovative aluminum cross processing company, that strives for and promotes the highest standards of conduct, ethics, integrity, and sustainability. TAHA seeks like-minded partners who do the same.

In this Business Partner Code of Conduct (“Business Partner Code”), ‘business partners’ means all persons engaged to act on behalf of or in partnership with TAHA, including representatives or sponsors, joint venture, consortium, or equity partners, and service providers such as suppliers, vendors, consultants, subconsultants, contractors and subcontractors and their employees or persons acting on their behalf.

We expect our business partners to follow the standards set out in this Business Partner Code when they conduct business for, on behalf of or in partnership with TAHA. Our business partners may expect that TAHA employees will follow the same standards and will never expect or ask anyone to violate them.

Compliance

Business partners must comply with this Business Partner Code as well as with applicable laws, regulations and associated requirements and industry standards. They are expected to ensure that these standards and principles apply to their own business partners and throughout their supply chain. This Business Partner Code supplements any contractual obligations between TAHA and a business partner.

Business partners must never act in a way that could cause TAHA to violate laws, regulations and associated requirement and industry standards or expose it to any penalties. In the case of non-compliance with this Business Partner Code or where the business partner is materially misaligned with TAHA’s values, TAHA reserves the right to implement stringent measures. Measures may include working with our partners to ensure corrective actions are implemented or terminating the business relationship.

Human Rights and Equality

TAHA promotes equality, diversity and inclusion and safeguards human rights.

TAHA expects that business partners:

- Adopt practices that safeguard human rights in all their dealings.
- Not engage in or with any form of modern slavery, human trafficking or activities that encourage human trafficking, including any use of forced, enslaved, compulsory, bonded or prison labour at any level of their supply chain and regardless of local customs;
- Not coerce labour or suppress reports of mistreatment by threats of penalty at any level of their supply chain;
- Not engage in the use of child labour, and align their practices with those set out in the International Labour Organization's Minimum Age Convention;
- Allow their employees to leave their positions freely or to terminate their employment with reasonable notice;
- Not require employees to surrender government-issued identification or work permits as a condition of employment;
- Comply with applicable modern slavery and human trafficking laws and regulations; and
- Be open and transparent about their recruitment practices, policies and procedures in relation to modern slavery and take steps that are consistent and proportionate with their sector, size and operational reach.



Employment Practices and the Workplace

TAHA promotes a congenial working environment in which all individuals are treated with dignity and respect, free from harassment, discrimination, bullying, racism, violence, or injustice.

TAHA expects that business partners:

- Ensure a respectful and safe workplace.
- Provide their employees and supply chain with a work environment that is free of verbal, physical or psychological harassment (including sexual harassment) and any discriminatory, violent, harsh or inhumane treatment.
- Offer fair compensation (e.g. minimum or statutory wage, maximum hours of work, days of rest) without discrimination and in compliance with local labour laws and regulations.
- Respect their employees' freedom to associate, form and join organizations and collectively bargain;
- Offer equal opportunities to their employees by making employment decisions including hiring, placement, promotion, development, training and compensation based on the person's qualifications, experience, performance, skills and potential and without discrimination as noted above;
- Support and encourage a diverse and inclusive work environment; and
- Protect their employees from any form of retaliation.

Discrimination includes adverse treatment based on race, perceived race, ancestry, ethnic origin, citizenship, creed, colour, religion, age, sex, sexual orientation, gender identity, gender expression, marital or family status, physical or mental disability, political belief, political affiliation or activity, social condition, lawful source of income, association, military status, genetic data, or pardoned conviction.

Environment

TAHA provides high quality services that have a positive impact on the environment and communities.

TAHA expects that business partners:

- Protect the environment and adopt policies, procedures and systems to conduct business sustainably;
- Strive to reduce the environmental impact of their activities;
- Provide complete and accurate data necessary for TAHA and its clients to meet their compliance obligations;
- Prevent pollution and implement response procedures to reduce damage from environmental incidents;
- Comply with applicable environmental laws and regulations, including permitting requirements; and
- Report immediately any environmental incidents involving or affecting TAHA in accordance with local procedures and contracting requirements.

TAHA strongly encourages business partners to report on their environmental and climate performance and to measure and report scope 1, scope 2 and scope 3 greenhouse gas (GHG) emissions, as defined by the GHG Protocol Corporate Standard. Business partners may be required to:

- Collect complete, consistent and accurate scope 1, 2 and 3 GHG emissions data and report data to TAHA through the CDP Climate Change questionnaire;
- Provide independent or third-party assurance;
- Adopt science-based GHG emissions reduction and renewable electricity targets
- Evaluate climate risks and opportunities and implement climate resilience measures;
- Communicate their commitment to environmental responsibility to management, employees and business partners;
- Apply for and maintain ISO 14001 or equivalent certification; and
- Audit their environmental performance frequently and consistently and issue progress reports.

Specific requirements for data disclosure, assurance and reduction targets will be in business partner contracts or communicated in writing by TAHA to business partners.

Respect for Communities including Indigenous Communities

TAHA values and respects the communities we do business in.

TAHA expects that business partners:

- Work collaboratively with local and indigenous communities, groups and businesses, and
- Actively consider interests of indigenous communities, and act to mitigate any impacts on them.

Effects of conflicts on business areas:

High-risk contexts include situations of armed conflict and mass violence as well as areas with weak governance or rule of law, extensive corruption or criminality, significant social, political, or economic instability, historical conflicts linked to ethnic, religious, or other identities, closure of civic space, and a record of previous violations of international human rights and humanitarian law.

No one factor drives the conflict and instability seen in these contexts. Rather, a complex interplay of social, political, environmental, and economic factors fosters an environment where violence, oppression, poverty, human rights abuses, and state failure are more likely to occur. These factors include social divisions; governance grievances like political exclusion, weak state accountability, corruption, and inadequate service provision; economic grievances like limited economic opportunity and economic inequality between groups; and environmental factors, including climatic shocks and stresses as well as natural resource scarcity and degradation.



Health and Safety

TAHA puts the safety of all employees first.

TAHA expects that business partners:

- Proactively identify and eliminate health and safety hazards associated with work sites;
- Conduct project risk assessment and/or field level risk assessment and develop the fit for purpose safety plan;
- Implement standard work instructions and provide appropriate protective equipment for staff;
- Provide training, procedures and guidance in a language that employees understand; no employee is to be allowed in the field without the proper training;
- Implement a health and safety management program to drive continual improvement and transparent reporting;
- Follow and adhere to site-specific health & safety procedures and applicable TAHA action plans;
- Minimize impact of potential and significant risks identified on project sites;
- Comply with applicable health and safety laws, regulations and industry requirements; and
- Report immediately any incident, unsafe act, situation or insecure environment in accordance with local procedures and contracting requirements.

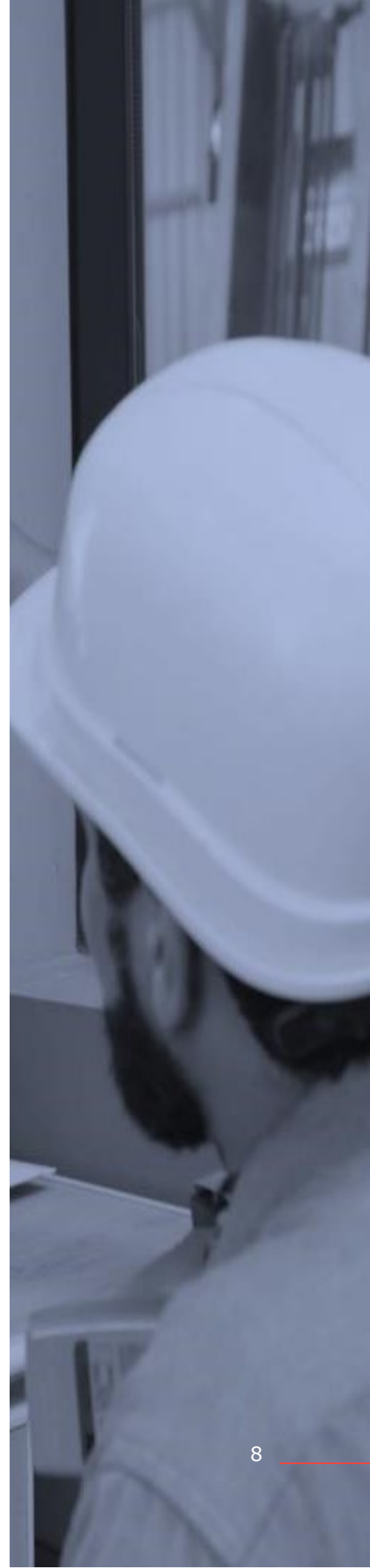


Integrity

TAHA conducts business with honesty, integrity, and respect. We do not tolerate any form of corruption.

TAHA expects that business partners:

- Never accept, request, offer, promise, give or authorize a bribe, kickback, payment or anything of value (financial or otherwise) to obtain an unfair or improper advantage, retain business or influence a third party's actions or decisions;
- Never offer or accept gifts, entertainment or other business courtesies on behalf of TAHA without prior documented authorization from TAHA;
- Never offer or accept business courtesies of more than modest value, offer cash or cash equivalents or exchange any benefit with a public official or other recipient involved in an active procurement process or what would otherwise appear to reward preferential treatment or create an obligation;
- Ensure that any business courtesy exchanged is recorded, auditable and suited to the occasion and roles of those involved;
- Comply with applicable anti-corruption and lobbying laws, and acknowledge that UN's Corruption of Foreign Public Officials Act, and the United Nations Foreign Corruption Practices Act, one or more of which govern the activities of TAHA, may apply, including to its business partners; and
- Refrain from making facilitation payments on behalf of TAHA or for its intended benefit, even where legal.



Conflicts of Interest

TAHA believes that personal interests should not affect business decisions made on TAHA's behalf. TAHA expects that business partners:

- Act in TAHA's best interest and must avoid any real, apparent or potential conflict of interest.
- Document adequately any activity that has been approved to proceed despite an identified conflict of interest; and
- Promptly disclose in writing to TAHA's Ethics and Compliance Office any real, apparent or potential conflict of interest that has arisen during their business relationship with TAHA, and propose possible mitigation strategies.

Fair Competition

TAHA values fair and open competition. TAHA expects that business partners:

- Carry out their activities in a manner that safeguards fair, open and transparent competition.
- Comply with applicable anti-trust and fair competition laws and regulations; and
- Never participate in illegal practices such as price fixing, market or customer allocation, market sharing, bid rigging or monopolistic conduct.



Fraud and Money Laundering

TAHA prohibits fraudulent or dishonest activities. TAHA expects that business partners:

- Never engage in fraudulent practices, false claims, criminal facilitation, money laundering or tax evasion;
- Have reasonable internal controls in place to prevent, detect and respond to unusual or suspicious activity.
- Comply with applicable anti-money laundering and counterterrorism financing laws; and

Trade Compliance and Economic Sanctions

TAHA respects the laws that govern trade between the countries where we operate. TAHA expects that business partners:

- Have reasonable procedures in place to adequately vet their own business partners and supply chain, including beneficial owners;
- Have reasonable procedures in place to identify and comply with applicable laws and regulations that govern cross-border trade, export controls, economic sanctions, embargoes and anti-boycott laws, including those administered by the Governmental Bodies of Kingdom of Bahrain.
- Never include a contractual clause that would result in the illegal boycotting of a country, entity or person; and

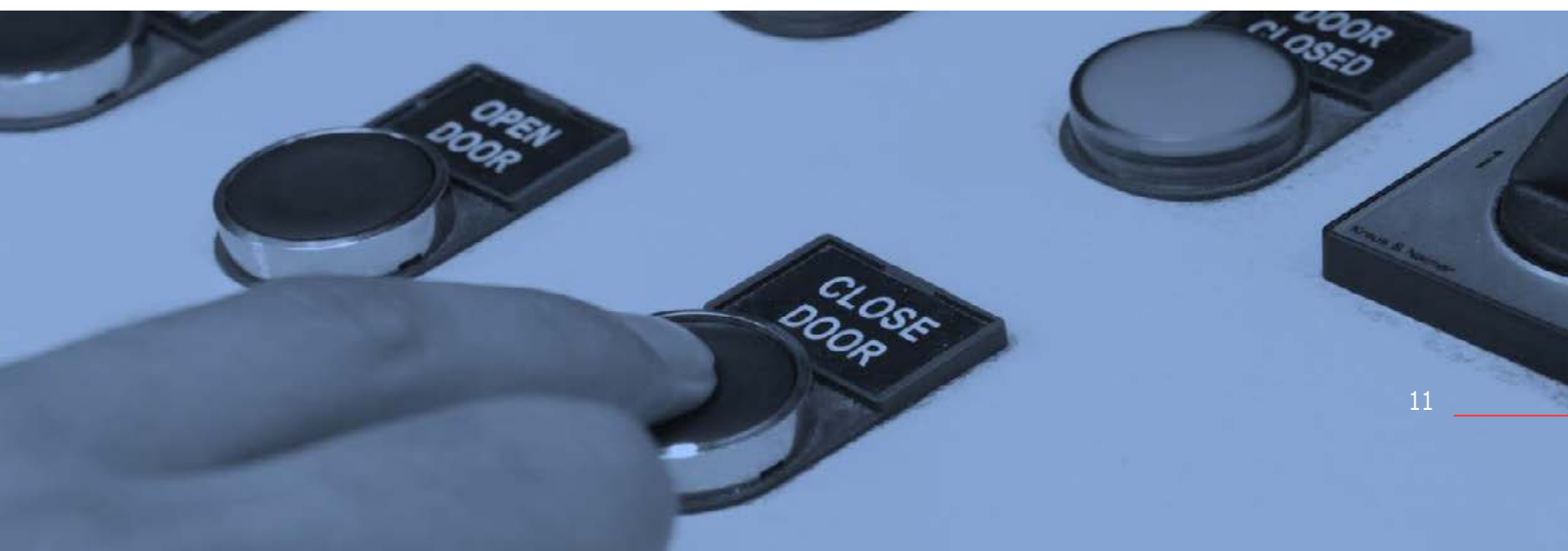
Confidential Information

TAHA values the protection of information of our employees, clients and business partners.

TAHA expects that business partners:

- Act with vigilance when handling TAHA Confidential Information;
- Limit the use of TAHA Confidential Information to individuals who require it to perform their work;
- Protect TAHA Confidential Information from unauthorized access, even after the termination of their business relationship with TAHA;
- Comply with applicable data privacy and data protection laws and regulations;
- Comply with TAHA's Privacy Policy, information security policies and contractual requirements when processing, collecting, storing, accessing, modifying, sharing or transferring TAHA Confidential Information; and
- Report immediately any suspected or unauthorized access, use, disclosure or loss of TAHA Confidential Information through the business partner or the business partner's supply chain to TAHA's Information Security Office within 24 hours of awareness.

TAHA's Confidential Information includes all information provided by TAHA and pertaining to TAHA, its clients, employees and business partners, unless designated otherwise by a member of TAHA.





TAHA Systems Access

TAHA expects users of our systems to safeguard our assets and use them appropriately. TAHA expects that business partners:

- Make no attempt to bypass any security controls within TAHA systems;
- Ensure that any equipment connected to TAHA systems is free of and does not contain any codes or mechanisms that collect information or assert control of the systems without TAHA's consent or that may restrict legitimate access to TAHA systems;
- Ensure that any equipment connected to TAHA systems does not introduce any spyware, adware, viruses, trojans, worms or any other codes or mechanisms via any means designed to permit unauthorized access to or disrupt TAHA systems; or to destroy or render unusable TAHA information; and
- Ensure that any equipment provided by TAHA is used in compliance with TAHA's Information Security Policies.

Accurate Records

TAHA takes steps to deter fraud and ensure accurate record-keeping. TAHA expects that business partners:

- Maintain complete, accurate and honest records for business conducted with TAHA;
- Never make false, overstated, artificial or misleading entries or omissions in any systems, books or records;
- Comply with proper recordkeeping and retention practices and applicable standards and laws, and
- Grant TAHA the right to audit and access all relevant books, records and documents to assess compliance with this Business Partner Code, upon reasonable notice, for a minimum of six years or longer unless otherwise specified by the contractual agreement entered into between TAHA and the business partner.

Due Diligence

As part of the onboarding process and from time to time, TAHA conducts due diligence on its business partners.

Due diligence reduces reputational, commercial, and legal risks and promotes compliance with international standards concerning sanctions, anti-corruption, modern slavery, human trafficking, and data protection laws. Our business partner onboarding process includes a review of our relationship, transactions, country of origin, reputation, legal risks, and sustainability practices, as well as data security and privacy practices, where relevant.

TAHA's due diligence process may include verifications of the business partner through online databases and systems, questionnaires, certifications, and on-the-ground investigations. Business partners should expect to be subject to regular monitoring and re-assessments, which can result in a re-evaluation of their qualifications to do business with TAHA.





Reporting Suspected Violations

We provide high quality services that have a positive impact on the environment and communities.

TAHA is committed to protect reporting parties from retaliation whenever reports are made in good faith, including when reports come from an external reporting party. We expect our business partners to do the same and to understand and comply with applicable whistleblowing laws and regulations.

Business partners must report immediately any suspected violations of applicable laws or regulations or any TAHA policy, including this Business Partner Code or TAHA's Code of Conduct. TAHA reserves the right to conduct audits and investigate any reasonably suspected breaches. Business partners are expected to cooperate during any such audits or investigations.

Concerns or suspected violations can be reported in the following ways:

- TAHA's Business Conduct Hotline
- TAHA's Ethics and Compliance Office
- TAHA HR Manager

Questions or Comments?

Any questions or comments on the content of this Business Partner Code should be directed to TAHA's [Ethics and Compliance Office](#).