



# **ALCOA GUIDE TO BUSINESS CONDUCT**

**Provided to  
CUSTOMERS and SUPPLIERS**



**Do What's Right!**

**OVERVIEW OF BUSINESS CONDUCT**

Every company depends on its good name to succeed. Alcoa relies on its employees, business partners, and processes to consistently do the right thing, in the right way, to maintain its good name.

Alcoa employees and business partners must take a personal interest and responsibility for protecting Alcoa's good name in the following manner:

- **Understand correct work behavior.**

Each employee must know Alcoa's values, policies, procedures and legal requirements that guide his or her work conduct. If a person does not know, he or she will ask for help *before* taking action.

- **Respect people and the law in the workplace.**

Each employee, supplier, customer and contractor is expected to behave in an ethical and lawful way when doing Alcoa business.

- **Question and/or report activities that appear to violate Alcoa values.**

Each employee should ask questions, raise concerns and report dishonest or unethical actions by the company or any of its employees, representatives, or customers and suppliers when they are dealing with Alcoa.

Compliance with local law, and Alcoa's values, policies and procedures is not optional. These exist to protect employees, customers, suppliers, and the company from improper conduct.

The information contained in this guide is a subset of items provided to Alcoa employees in the Alcoa Guide to Business Conduct. The focus of this guide is on business conduct issues most likely to exist in relationships with our business partners. For the purposes of this guide, the term 'Alcoa employee' will include employees, contractors, and representatives or agents of Alcoa.

Alcoa expects its employees to follow these guidelines. Please report to Alcoa any behavior by an Alcoa employee that appears to violate these guidelines.

In addition to normal channels of communication and resources available for help, the Ethics and Compliance Line is a simple way for any employee to report a concern about business or workplace activities that may not align with Alcoa's values, or to ask a question if clarification or advice is needed. The Ethics and Compliance Line works 24 hours a day.

For specific phone numbers and dialing instructions for your country, refer to the Ethics and Compliance Line informational brochures and posters, or find them on the Ethics and Conduct page, in the Global Compliance community, on the Alcoa portal at:

[http://www.alcoa.com/global/en/about\\_alcoa/corp\\_gov/business\\_conduct.asp](http://www.alcoa.com/global/en/about_alcoa/corp_gov/business_conduct.asp)

**CONDUCT INVOLVING OURSELVES AND OUR FELLOW EMPLOYEES**

The basis of our values is dignity and mutual respect for each other. These values drive our business.

- All Alcoa employees must comply with the company's values and principles.
- No one may ask any Alcoa employee to break the law, or go against the company's values, policies and procedures.

**Health and Safety**

- Alcoa will not compromise health or safety in the workplace for profit or production.
- Employees must not use, bring or transfer illegal drugs on company property.
- Employees are not allowed to work if affected by alcohol or using illegal drugs. Misusing legal drugs in the workplace is not allowed.
- Employees may not act violently or threaten violence while at work, and may not bring or use a weapon on a work site.

**Respect and Fair Treatment**

Diversity is a strength in Alcoa. Every employee must respect the people and cultures with which we work.

**Harassment**

Alcoa does not tolerate any form of harassment. Harassment can take many forms, all of them unacceptable as shown in the following examples.

- Jokes, insults, threats, and other unwelcome actions about a person's race, color, gender, age, religion, national origin, ancestry, sexual orientation, citizenship, disability, veteran status, social or economic status or educational background.
- Unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature, or the display of sexually suggestive objects or pictures.
- Verbal or physical conduct that upsets another's work performance or creates a fearful or hostile work environment.

**CONDUCT INVOLVING OUR BUSINESS****PARTNERS**

Our values, honesty, and behavior do not stop with our actions, or at our doors. We expect the same from our suppliers, customers and others who do business with us.

**Conflicts of Interest**

- No employee should represent Alcoa in a business deal if he or she, a family member or a close friend has a financial interest.
- No employee should take any business action for personal benefit, or to benefit a relative or close friend.

**Proper Use**

No receipt or payment of funds, property, service or anything else of value shall be received by, or made by, Alcoa if it will be used for any unlawful purpose or for any purpose other than described in the documentation that supports the transaction.

**Gifts and Entertainment**

- No gift, favor, or entertainment should be accepted or provided if it will obligate or appear to obligate the person who receives it.
- Receiving or giving gifts of cash or cash equivalents is never allowed.
- Company employees may accept or give gifts, favors and entertainment only if they meet all of the following criteria:
  - They are not against the law or the policy of the other parties' company.
  - They are consistent with customary business practices in the country or industry.
  - They are reasonably related to business relationships.
  - They do not cost too much, and are consistent with any existing Business Unit guidelines.
  - They cannot be viewed as a bribe, payoff or improper influence.
  - Public disclosure of the facts would not embarrass the company or the employee.
  - They do not violate our business values or ethics in any other manner.
- It is never acceptable to request or ask for personal gifts, favors, entertainment or services.
- To prevent conflicts around gift giving, it is often helpful at the start of a business relationship to discuss what is not allowed.

**Fair Competition and Antitrust**

Alcoa representatives may not discuss or enter into a formal or informal agreement with any competitor about prices, or matters affecting price, production levels or inventory levels, bids, or dividing production, sales territory, products, customers or suppliers.

Agreements with customers or suppliers that establish the resale price of a product, limit a customer's right to sell products, or condition the sale of products on an agreement to buy other Alcoa products are not allowed in many jurisdictions.

**Sharing Information**

Unless sharing information with external suppliers and customers is against the law, or company or business practice, Alcoa encourages sharing information when it may improve the quality, or use of, our products. If Alcoa proprietary information is given outside the company, make sure a written confidentiality and non-disclosure agreement is prepared, and that proper controls are established to manage the flow of information.

**Gathering and Using Competitive Information**

- Alcoa employees may only gather information by legal means.
- Alcoa employees must never use any illegal or unethical means to get information about other companies.
- Do not share confidential information from suppliers or customers with anyone outside Alcoa without written permission.
- If agreements are signed to protect information, be sure to follow the terms and conditions.

**Customer Relations**

- Alcoa will compete for business aggressively and honestly.
- Do not misrepresent products, services and prices.
- Do not make false claims about competitor offerings.
- Alcoa will not change product or service specifications in design or materials, or use other parts, unless clearly allowed by the customer, or permitted by regulation or commercial practice.
- Alcoa will only supply safe products and services that meet all applicable government standards and regulations.

**Supplier Relations**

- Base all procurement decisions on the best value received by Alcoa. Base the purchase of goods and services only on the merits of price, quality, performance and suitability.
- Avoid reciprocal agreements or exchange of favors.
- The fee or price paid for goods and services by Alcoa must represent the value of the goods or services provided.
- Alcoa will not knowingly use suppliers who participate in the following activities:
  - Supply unsafe products or services.
  - Break laws or regulations.
  - Use child labor or forced labor.
  - Use physical punishment to discipline employees, even if it is allowed by local law.

**Money Laundering**

Money laundering is the process by which individuals or entities try to conceal unlawful funds, or otherwise make these funds look legitimate. Alcoa will not condone, facilitate or support money laundering.

**CONDUCT INVOLVING OUR BUSINESS RESOURCES**

Alcoa's shareholders trust us to properly buy, use and protect the assets of the company, and to respect the property and rights of others.

**Accuracy of Records and Reports**

Be sure that any document you prepare or sign is correct and truthful.

**Intellectual Property**

- Alcoa will respect and honor the intellectual property rights of others.
- We will not use the patent rights of others without first obtaining a license or the approval of Alcoa legal counsel.

**Copyrighted Material**

Copyright laws protect many materials used in the course of our work. We may not reproduce, distribute, or alter copyrighted materials owned by others unless we have prior permission.

**CONDUCT INVOLVING OUR COMMUNITIES**

Alcoa will be a good community partner. We will positively add to the communities where we do business.

**Compliance with Applicable Law**

All Alcoa employees must follow all laws, regulations and company policies that govern their work. Laws and regulations may differ, depending on the country or state in which we work. Because Alcoa Inc. is a company based in the United States, some United States laws apply to subsidiaries outside the United States.

No excuse or pressure justifies breaking the law. Do not use a consultant, representative or contractor to break the law. In some countries, certain conduct is banned but the ban is not currently enforced. This does not excuse any illegal action by an Alcoa employee.

**Environmental**

Alcoa is committed to good environmental management.

- Any waste materials left over from our operations must be disposed of legally and in a way that meets the company's environmental standards.

**Anti-Corruption**

Alcoa policy prohibits bribery, or giving money or anything of value directly or through other parties, to any government official in order to influence their decision.

**International Trade**

- Since Alcoa as a Group is based in the United States, all Alcoa locations must comply with economic sanctions and trade embargoes imposed or approved by the United States Government.
- Many countries have laws and regulations that cover imports and exports between countries, organizations and people. When Alcoa is importing and exporting products, information or technology, Alcoa will follow applicable national and international laws, regulations and restrictions. If a conflict exists, contact Alcoa Corporate Compliance.
- Alcoa personnel will work within our global operations and with suppliers and service providers to ensure strong security measures are in place from the time a product is ready for shipment, is in transit through the entire transportation chain, until the product arrives at its intended destination.