

Policies & Standards

ALUMINA LIMITED'S CODE OF CONDUCT

1. We will be honest and ethical in all of our actions and relationships and act in the interests of the shareholders.
2. As a minimum, we will observe the rule and intent of all relevant governmental laws, regulatory and professional rules and guidelines.
3. We will maintain an appropriate level of confidentiality at all times with respect to company, employees and business associate's information.
4. We will act fairly, be honest, open, and accountable in all dealings with internal and external parties.
5. We will avoid situations in which individual personal interest may conflict with the interest of the company and communicate any real or potential conflict of interest to the Board.
6. We will maintain all records of the company to be accurate, in accordance with applicable procedures and accounting standards and that financial information is complete, fair, timely and understandable.
7. Where commercially prudent, financial information is openly available to internal and external users.
8. We will maintain systems of sound internal controls and procedures, and act in a manner to protect the Company's assets, appropriately manage risk and ensure financial information is complete and accurate.
9. We will uphold the Company's values and principles as reflected in this Code, the Company's policies, standards and charters.
10. We will not use the corporate privilege of information, position or property for the purposes of personal gain or competing with the company.
11. In fostering ethical, fair and legal behaviour, we encourage officers and employees to report any questionable practice. Reprisals against people for reports made in good faith will not be tolerated.
12. Any request for a waiver of the provisions of this Code may only be considered by the Company's Board of Directors. Any waiver granted will be promptly disclosed on the Company's website.
13. Any suspected violations of this Code should be reported promptly to the Chairman of the Company's Board of Directors. Violations will be investigated by the Board or by a person or persons designated by the Board and appropriate action will be taken in the event of any violations of the Code.