

CODE OF CONDUCT

ALPHA HPA LIMITED
ABN 79 106 879 690



CONTENTS

1. Managing directors message	3
2. Background and purpose	3
3. Application	3
4. Principles	3
5. Definitions	8
6. Document control table	9

1. MANAGING DIRECTORS MESSAGE

Our Code of Conduct sets out the minimum standards of behaviour we expect of everyone, so that our business can be a place of integrity, diversity and inclusion, where our people enjoy working together, can create positive change and strive for excellence – together.

The Code of Conduct should be read in conjunction with our policies and procedures, which detail how we go about our work and our Values, which set out the behaviours our employees aspire towards. Together, our Code of Conduct, Statement of Values, policies and procedures guide our people and our mission.

OUR MISSION

Alpha HPA is on a mission to supply decarbonisation by delivering the most sustainable, high purity aluminum products to the world. Our use of the Smart SX Technology reflects our commitment to global decarbonisation and our vision to bring the entire world forward, together.

2. BACKGROUND AND PURPOSE

Alpha HPA Limited (**Alpha HPA**) identifies its responsibilities as a specialty chemical company in respect of environmental and other industry related issues in Australia, but also recognises its obligations to indigenous stakeholders and other members of our local community. Alpha HPA is a business adopting the highest standards of ethical conduct in accordance with the core principles encapsulated in this Code of Conduct (**Code**).

3. APPLICATION

We recognise that our reputation is one of our most valuable assets and is founded largely on the ethical behaviour of the people who represent Alpha HPA.

This Code applies to all directors, employees, contractors and consultants of Alpha HPA (**Alpha HPA Personnel**) and compliance with this Code, Alpha HPA policies and the law is a condition of working with Alpha HPA and will serve to enhance our reputation for fair and responsible dealings and promote high standards of behaviour across our business.

4. PRINCIPLES

The Code operates on 6 guiding principles that inform every decision and action we take:

- 1) We do the right thing by our shareholders, customers, employees, suppliers and communities
- 2) We are committed to conducting business with integrity, honesty and fairness
- 3) We use information appropriately and are committed to safeguarding Alpha HPA's property and resources
- 4) We embrace diversity and treat each other with respect
- 5) We comply with applicable trade control laws and regulations
- 6) We hold each other accountable to the Code of Conduct

WE DO THE RIGHT THING BY OUR SHAREHOLDERS, CUSTOMERS, EMPLOYEES, SUPPLIERS AND COMMUNITIES

We recognise that our shareholders, customers and consumers, employees and the communities where we operate rightly expect us to demonstrate corporate responsibility leadership.

Alpha HPA Personnel are expected to:

- a) Observe the letter and spirit of all relevant laws and regulations.
- b) Implement appropriate Health Safety and Environment policies, practices and procedures with the objective of zero injury to our employees and zero harm to the environment and our communities from our operations.
- c) Adhere to the ASX Principles of Good Corporate Governance.
- d) Deal fairly and honestly with customers, suppliers and the community.
- e) Understand and comply with legal requirements and Alpha HPA policies.

Suppliers

We seek to build mutually beneficial working relationships and partnerships with our suppliers through the development and continual improvement of processes and systems that address the expectations outlined in accordance with *Alpha HPA's Supplier Code of Conduct*.

WE ARE COMMITTED TO CONDUCTING BUSINESS WITH INTEGRITY, HONESTY AND FAIRNESS

To uphold Alpha HPA's values of transparency and communication, we are committed to conducting business with integrity, honesty and fairness. This includes complying with any relevant legislative, industrial and administrative requirements and any lawful direction made by a person with the authority to give such direction.

We expect all Alpha HPA Personnel to be familiar with and abide by all Policies in operation with Alpha HPA. If you are uncertain as to which Policies or laws apply speak with your manager. If you are still uncertain, seek help from the People, Talent & Capability Manager.

We uphold the highest professional standards in our conduct including:

- act in accordance with Alpha HPA's values and the best interests of Alpha HPA;
- act honestly and with high standards of personal integrity;
- complying with Alpha HPA's standards set out in our policies;
- treating our staff and others we deal with in a respectful manner
- contributing and implementing decisions to the best of our ability; and
- not take advantage of their position or opportunities arising therefrom for personal gain
- disclose and deal appropriately with any conflicts between their personal interests and their duties as a director, senior executive or employee

Conflicts of Interest

Handling actual, potential or reasonably perceived conflicts of interests ethically, transparently and honestly is essential in upholding public trust and confidence in Alpha HPA.

Alpha HPA Personnel are expected to avoid actual or potential conflicts of interest, if a conflict of interest arises, be it actual, potential or reasonably perceived, you need to declare it in line with the *Annexure – Conflict of Interest Disclosure Procedure* at the earliest opportunity. Managing conflicts of interest in accordance with Alpha HPA's *Board Charter Policy* will help to ensure that all decisions made on behalf of Alpha HPA are the best possible outcomes and reduce the risk of fraud and corruption.

Gifts and benefits

Receiving gifts, benefits or hospitality may be perceived as having an undue influence on the work we undertake and has the potential to compromise current and future impartial decision making. By complying with the *Anti-Bribery and Corruption Policy* you can minimise the risk.

Alpha HPA Personnel are expected to:

- a) Never give or receive bribes or improper payment or any other similar inducements (such as money, discounts, or some other consideration).
- b) Decline gifts or other benefits that will compromise their independence.

If you are offered a bribe, you must:

- Refuse it;
- Indicate that it is not appropriate; and
- Immediately report the matter via RSC@alphahpa.com.au in accordance with the *Anti-Bribery and Corruption Policy*

Any attempt to bribe Alpha HPA Personnel and/or the acceptance of a bribe is considered a breach of this Code and must be reported. It may also constitute a criminal offense.

WE USE INFORMATION APPROPRIATELY AND ARE COMMITTED TO SAFEGUARDING COMPANY PROPERTY, RESOURCES AND INTELLECTUAL PROPERTY

Alpha HPA carefully manages its information, data and intellectual property as sharing certain kinds of information prematurely can have a negative impact on our projects, our reputation and our competitive advantage, and can prove costly in other ways.

Alpha HPA Personnel are expected to:

- a) Maintain the confidentiality of business information that they have access to in their work.
- b) Respect the privacy of individuals and the privacy laws in relation to the collection, use and handling of other people's personal information.
- c) Use Alpha HPA information and communication tools in an effective, ethical and lawful manner.
- d) Protect Alpha HPA property and the belongings of others from theft, misappropriation and misuse.

Confidentiality of information

Alpha HPA Personnel must, at all times, maintain the confidentiality of all official information and documents which are not published or normally available to the public.

Protecting our Intellectual Property

All work carried out in the course of employment with Alpha HPA is Intellectual Property owned by Alpha HPA. This includes written works, the creation of templates, plans, concepts or ideas, training materials, manuals, or other subject matter (including any software, products and services).

The copyright of material created by you in the course of your work belongs to Alpha HPA, even if the material was developed in your own time or at home or another location.

Your obligation not to disclose information outside Alpha HPA extends to all Intellectual Property owned by Alpha HPA in accordance with any Intellectual Property policy in place from time to time. This means you may not use, deal with or disclose Intellectual Property outside Alpha HPA without the express written consent of your manager, even if you created or produced (either solely or with others) the Intellectual Property. If the Intellectual Property of Alpha HPA is used in a contrary manner, such conduct will be regarded as a breach of this Code. We all have an ongoing duty to protect confidential information that we have had access to through our work, which could include organisational information, information generated by another party, or information generated through a recruitment or procurement process.

WE EMBRACE DIVERSITY AND TREAT EACH OTHER WITH RESPECT

We value and respect the diversity of our employees and are committed to creating an inspiring workplace where everyone is treated equally and fairly, in which no-one is discriminated against in any way on the basis of characteristics such as gender, age, race, religion, sexual orientation or marital status, and in which no-one is subject to or commits any act of harassment.

Respect and inclusion are fundamental to a harmonious, productive and psychologically safe workplace where people feel safe to speak up about concerns. We are committed to ensure our workplace is a safe environment in which everyone feels they can achieve their potential. As outlined in the Diversity Policy.

We will:

- a) Not tolerate any form of discrimination or harassment in the workplace.
- b) Provide employees with performance management processes that will be applied fairly and honestly.
- c) Recognise achievement and communicate what needs to be done to those who have not performed to expectations.
- d) Ensure that there are systems and procedures in place to ensure that employees are fit for work and understand their obligations in relation to consumption of alcohol, drugs and prescription medications.

WE COMPLY WITH APPLICABLE TRADE CONTROL LAWS AND REGULATIONS

We support the principles of free competition and will observe the spirit and letter of competition laws. You should exercise high standards of ethical conduct in all business dealings including those with suppliers, customers and consumers regarding our marketing and selling activities, our use of market power, our description of goods and services and the quality and safety of our products.

Alpha HPA Personnel are expected to:

- a) Never say or do things that are likely to mislead or deceive people.

- b) Ensure that all of our products and services that we supply to customers, consumers and the community meet Alpha HPA high quality and safety standards as well as those standards required by law.
- c) Only trade in Alpha HPA shares in the approved “trading windows” and in accordance with the Alpha HPA Security Trading Policy.

WE HOLD EACH OTHER ACCOUNTABLE TO THE CODE OF CONDUCT

If you have any questions that are not specifically addressed in this Code or any of the Alpha HPA policies referred to in this Code, please contact your Manager or People, Talent & Capability Manager for advice.

Any breach of this Code is a serious matter that may give rise to disciplinary action including dismissal and legal action. If you are aware of any serious misconduct or unethical behaviour that may breach this Code, any of Alpha HPA policies or the law, you must report the incident immediately.

If the breach is related to any of the following Alpha HPA policies, please refer to the appropriate policy for the respective reporting channels:

- Whistleblower Policy
- Anti-Bribery and Corruption Policy
- Fraud Management Policy.
- Conflict of Interest Disclosure Policy

If the breach is not related to the above policies, you must report the incident immediately via the following channels:

- Your Manager
- People, Talent & Capability Manager; and/or
- Contact our Managing Director
- Any employee who makes a report in good faith will be treated with respect and will not be subject to any retaliation.

5. DEFINITIONS

TERM	DEFINITION
Board	means the Board of Alpha HPA
Bribe	Bribe or bribery is defined under AS8001-2021 and ISO37001:2016 as offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.
MD	means the Managing Director
Code, the Code	means this Code of Conduct
Conflict of Interest	Conflict of Interest is defined under AS8001-2021 <i>Fraud and Corruption Control Standard</i> as a situation where business, financial, family, political or personal interests could interfere with the judgement of persons carrying out their duties for the organisation.
Immediate Family Member	means spouses, de facto partners, parents, children, and siblings of Alpha HPA Personnel.
Intellectual Property	means work produced in the course of employment with Alpha HPA which is Intellectual Property owned by Alpha HPA. This includes written works, the creation of templates, plans, concepts or ideas, training materials, manuals or other subject matter (including any software, products and services).

6. DOCUMENT CONTROL TABLE

DOCUMENT INFORMATION	
Document approver	Managing Director
Document owner name	People, Talent and Capability Manager
Document version number	2.0
Document version date	3 September 2025
Document review cycle	Every two years
Next Document review date	3 September 2027
LINKED ARTEFACTS	
Linked documents	• Anti-Bribery and Corruption Policy • Board Charter Policy • Declarations of Interests Register • Diversity Policy • Fraud Management Policy • Gifts and Benefits Register • Statement of Values • Supplier Code of Conduct • Security Trading Policy • Risk Management Policy • Whistleblower Policy
Linked legislation	• Government Information (Public Access) Act 2009 • Privacy and Personal Information Protection Act, 1998 • State Records act 1998 • Work Health and Safety Act 2011
Linked risks	• Reputational • Regulatory • Finance