



ALULINE GROUP ANTI-CORRUPTION POLICY

NOV 2011

INTRODUCTION

Most countries have laws that prohibit corruption and bribery. Increasingly these laws will extend to payments to foreign entities or individuals outside these countries' own borders. Enforcement of anti-corruption and bribery laws has stepped up significantly in the last decade, particularly on the part of the US authorities and also in the UK with the introduction of the Bribery Act.

Penalties can be severe with fines running into millions of dollars and fines and imprisonment for individuals. In addition illegal arrangements (including contracts) are unenforceable. Finally, the taint of bribery and corruption could do incalculable damage to Alulines reputation.

In recognition of the above Aluline has a clear anti-bribery policy;

encourages employees to report any suspicion of bribery; and will investigate rigorously any instances of alleged bribery

WHAT IS BRIBERY

A bribe is a reward, advantage or benefit made or offered for the purpose of improperly obtaining or retaining business or for any other improper purpose or commercial advantage. Kickbacks (i.e. the payment or receipt of a contract payment) are a form of bribe. In many countries a payment may be a bribe even if not made to a government official. Bribes may be made directly or through an intermediary.

ANTI BRIBERY POLICY

Alulines employees must not directly or indirectly offer, promise, pay or give a bribe to any person or authorise such a bribe, or accept a bribe.

This prohibition includes the use of contracts or consulting agreements to channel payments to public officials, political parties, or political figures including their relatives or business associates.

The policy applies whether or not payment is made to a public official.

Breach of this policy will result in disciplinary action up to and including summary dismissal.

FACILITATION OR "GREASE" PAYMENTS

Facilitation payments are payments made to secure or accelerate routine government procedures such as to: 2 obtain licences, permits or other documents to qualify to do business in a foreign country;

process visas or secure custom clearance; or secure police protection.

Aluline does not permit such facilitation payments to government officials, even if the payments are of nominal value only unless authorised in advance by the Legal Department and the Managing Director .

INTERMEDIARIES OR THIRD PARTIES

Improper payments may not be made through third parties.

Employees must be diligent in appointing and monitoring contractors, agents and joint venture partners. Specific rules apply within Aluline relating to the acceptable terms of contracts with foreign agents (including the length, commissions payable and compliance by the agent with Alulines policies) and the regular monitoring of those agents.



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PUBLIC/PRIVATE SECTOR

The division between the public sector and the private sector has become blurred through privatisation, state owned enterprise, public finance initiatives, joint ventures and government outsourcing. Bribery of government officials is illegal. Bribery of those working in the private sector is also often illegal under local laws and is always contrary to Alulines own business standards and prohibited by this policy.

EMPLOYEE RESPONSIBILITY

Protecting Alulines reputation is every employee's responsibility. Employees should therefore immediately report suspected violations of the law or of this policy pursuant to the Alulines Disclosure of Unethical Conduct Policy; they will not suffer any adverse company action when doing so, and the matter will be dealt with in the strictest possible confidence.

COMPLIANCE

Compliance with this Policy will be treated in the same manner as other Aluline-wide policies. All Management will be required to sign a disclosure statement each year acknowledging their receipt of a copy of this Policy; their dissemination of the Policy to their direct reports; and their disclosure of any known violations of the Policy, to the extent not previously reported as required under the Policy.

This policy will be part of Alulines ongoing assessments.