

Antitrust

PARTICIPATE | IMPROVE | CREATE | COLLABORATE | MODEL INTEGRITY | BE INTENTIONAL

Policy Number:	POL-601 Antitrust
Policy Category:	Business Compliance
Effective Date:	01/01/2025
Related Documents:	<i>POL-602</i>

PURPOSE & CONTENT

Antitrust laws were enacted to promote competition, prevent monopolies and protect consumers. TAA employees are expected to generally understand these laws, in particular, as they apply to their specific roles and Tri-Arrows Aluminum Inc.'s ("TAA") joint venture(s). In this regard, employees are required to participate in a mandatory annual Antitrust and Ethics training presentation. This presentation is made available as a resource to employees throughout the year and is required to be reviewed by new employees shortly after commencement of employment. Each employee is responsible for using reasonable efforts to prevent violations of anti-trust law and for speaking up if they witness violations. If an employee is unsure whether a certain action would constitute a violation of anti-trust law, they should seek the advice of TAA's VP – Legal or another TAA Leadership Team member immediately (and prior to taking any such action).

This policy includes the following:

- 1) Illegal Transactions
- 2) Communications with Competitors
- 3) Conduct with Customers
- 4) Conduct with Joint Venture
- 5) Proprietary Information and Selective Disclosure

1) ILLEGAL TRANSACTIONS

Price fixing, bid rigging, agreements between competitors to allocate suppliers, customers, sources, bids, contracts or other business opportunities are always illegal. Furthermore, unlawful agreements may include agreements with competitors to stay away from markets, limit production or supply, and restrict marketing or advertising, among others. Information about illegal activities can be found in the annual antitrust materials provided by TAA's legal counsel; however, if you are uncertain about a particular matter, please discuss with a TAA's VP – Legal or another TAA Leadership Team member.

2) COMMUNICATIONS WITH COMPETITORS

Communications with competitors is the biggest antitrust risk and special caution should be taken when interacting with competitors. No employee shall ever be permitted to discuss (whether verbally, in writing or otherwise) any of the following subjects with competitors (including, without limitation, a competitor's employees, contractors or other representatives):

- Prices, pricing levels, terms
- Output, production planning, or capacity utilization
- Customer relationships
- Costs, structures, or profit margins
- Customer/geography allocations

3) CONDUCT WITH CUSTOMERS

TAA shall at all times act independently in making decisions about to whom to sell, the products/lines of business it will enter into, and setting prices, production quantity and other terms and conditions of sale for its products. Furthermore, customers shall also make such decisions independently and are generally free to set their own resale prices.

4) CONDUCT WITH JOINT VENTURE

Joint ventures can serve as an effective and efficient means to promote innovation, production, distribution management, cost savings (greater and more efficient output), and access to capital or expertise. However, the joint ventures may never be utilized as a conduit for the exchange of confidential information among competitors. Confidential information includes, without limitation, marketing plans, customer lists, pricing & contract terms, supply inventory, technology/R&D plans, trade secrets and other proprietary information.

5) PROPRIETARY INFORMATION AND SELECTIVE DISCLOSURE

It is important that we respect the property rights of others. No TAA employee shall be permitted to improperly or illegally acquire, or seek to acquire, a competitor's proprietary or confidential information or to engage in the unauthorized use, distribution or alteration of a third-party's software or other intellectual property.

Further, TAA employees shall not selectively disclose any material nonpublic information with respect to TAA, its securities, business operations, plans, financial condition, results of operations or any development plan and TAA employees should be particularly vigilant when making presentations or proposals to customers so as to ensure that our presentations do not contain material nonpublic information.

As is the case with all policies, TAA reserves the exclusive right to interpret or modify this policy at any time, in its sole discretion.