



GLOBAL ALUMINA CORPORATION

INSIDER TRADING AND INSIDER REPORTING POLICY

1. INTRODUCTION

Global Alumina Corporation ("Global Alumina") encourages all directors, officers and employees to become shareholders of Global Alumina on a long-term basis. Purchases and sales of securities of Global Alumina are regulated by certain provisions of applicable provincial securities legislation in Canada, applicable corporate legislation and by certain policies of the Toronto Stock Exchange (collectively "Securities Legislation"). These provisions and policies prohibit any person in a "special relationship" with Global Alumina from trading in securities of Global Alumina with knowledge of material information which may affect the value of securities of Global Alumina but which has not generally been disclosed to the public. The directors of Global Alumina have established the following policy for all directors, officers and employees of Global Alumina and certain other persons who may have access to material information relating to Global Alumina. The directors of Global Alumina have also established the following guidelines relating to insider reporting requirements for all "insiders" of Global Alumina (being Global Alumina's directors and officers, the directors and officers of Global Alumina's subsidiaries and anyone who beneficially owns or exercises control or direction over more than 10% of the common shares of Global Alumina (a "Significant Shareholder") and its directors and senior officers).

2. INSIDER TRADING

A. Trading and Disclosure Restrictions

Securities Legislation provides that no person or company in a special relationship (as defined below) with Global Alumina may purchase or sell securities of Global Alumina with knowledge of material information (as defined below) concerning Global Alumina that has not been generally disclosed. In addition, Securities Legislation provides that no person in such a special relationship may inform (or "tip") another person or company, other than in the necessary course of business, of material information concerning Global Alumina before such information has been generally disclosed.

It is always improper and, in most cases illegal, for persons or companies in a special relationship with Global Alumina to acquire or dispose of securities of Global Alumina using material information that has not been generally disclosed or to inform other persons or companies of such information other than in the necessary course of business of Global Alumina. Improper trading with or disclosure of such information may expose such persons or companies to prosecution or lawsuits and will be considered by Global Alumina to be cause for dismissal.

B. Meaning of "Special Relationship"

The definition of a "special relationship" is very broad and, in addition to those persons ordinarily considered to be insiders of Global Alumina (such as the directors, officers and Significant Shareholders referred to above), also includes, among other things:

- any person or company engaged in a business or professional activity with, or on behalf of, Global Alumina, and any person who is a director, officer or employee of any such person or company;
- any person or company that is an insider, affiliate or associate of a person or company proposing to make a take-over bid for Global Alumina or to be a party to a reorganization, amalgamation, merger or arrangement or other business combination with Global Alumina or to acquire a substantial portion of its property; and
- anyone (a "tippee") who learns of material information concerning Global Alumina from someone that the tippee knows or should know is a person in a special relationship with Global Alumina.

C. Meaning of "Material Information"

"Material information" includes, but is not limited to, material facts and material changes as defined in Securities Legislation. A "material fact" is a fact that would reasonably be expected to have a significant effect on the market price or value of securities of an issuer. A "material change" is both (i) a change in the business, operations or capital of the issuer that would reasonably be expected to have a significant effect on the market price or value of any of the securities of the issuer, and (ii) a decision to implement such a change made by the directors or by senior management of the issuer who believe that confirmation of the decision by the directors is probable.

Securities regulatory authorities in Canada have given additional guidance relating to information which constitutes "material information". Based upon such guidance, for the purposes of this policy, developments which might constitute "material information" of Global Alumina include, among other things:

Changes in Corporate Structure:

- changes in share ownership that may affect control of Global Alumina;
- major reorganizations, amalgamations, or mergers; and
- take-over bids, issuer bids, or insider bids.

Changes in Capital Structure:

- the public or private sale of additional securities;
- planned repurchases or redemptions of securities;
- planned splits of common shares or offerings of warrants or rights to buy shares;
- any share consolidation, share exchange, or stock dividend;
- changes in Global Alumina's dividend payments or policies;
- the possible initiation of a proxy fight; and
- material modifications to rights of security holders.

Changes in Financial Results:

- Unsignificant increase or decrease in near-term earnings prospects;

- unexpected changes in the financial results for any periods;
- shifts in financial circumstances, such as cash flow reductions, major asset write-offs or write-downs;
- changes in the value or composition of the company's assets; and
- any material change in Global Alumina's accounting policy.

Changes in Business and Operations:

- any development that affects Global Alumina's resources, technology, products or markets;
- a significant change in capital investment plans or corporate objectives;
- major labour disputes or disputes with major contractors or suppliers;
- significant new contracts, products, patents, or services or significant losses of contracts or business;
- significant discoveries by resource companies;
- changes to board of directors or executive management, including the departure of any of Global Alumina senior executive officers;
- the commencement of, or developments in, material legal proceedings or regulatory matters;
- waivers of corporate ethics and conduct rules for officers, directors, and other key employees;
- any notice that reliance on a prior audit is no longer permissible; and
- de-listing of the company's securities or their movement from one quotation system or exchange to another.

Acquisitions and Dispositions:

- significant acquisitions or dispositions of assets, property or joint venture interests; and
- acquisitions of other companies, including a take-over bid for, or merger with, another company.

Changes in Credit Arrangements:

- the borrowing or lending of a significant amount of money;
- any mortgaging or encumbering of Global Alumina's assets;
- defaults under debt obligations, agreements to restructure debt, or planned enforcement procedures by a bank or any other creditors;
- changes in rating agency decisions; and
- significant new credit arrangements.

The underlying concern with respect to the events noted above is that they are all developments which would reasonably be expected to significantly affect the market price or value of Global Alumina's securities or would reasonably be expected to have a significant impact on an investor's investment decision should they be disclosed.

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Insiders should note that material information may include external facts (e.g., legislation or governmental policy) which would have a direct effect on the business and affairs of Global Alumina that is both material and uncharacteristic of the effect generally experienced by other companies. The nature of the effect of such information on Global Alumina (i.e., positive or negative) is irrelevant.

D. "Necessary Course of Business" Exception

As noted above, the so-called "tipping prohibition" provides for an exception with respect to information which is required to be disclosed in the necessary course of business. Securities regulatory authorities in Canada have given some guidance regarding the meaning of "necessary course of business" and have suggested that the exception would generally permit communications with:

- vendors, suppliers, or strategic partners of an issuer on issues such as research and development, sales and marketing, and supply contracts;
- employees, officers and board members of an issuer;
- lenders, legal counsel, auditors, underwriters, and financial and other professional advisors of an issuer;
- parties to negotiations with an issuer;
- labour unions and industry associates dealing with an issuer;
- government agencies and non-governmental regulators;
- credit rating agencies (provided that the information is disclosed for the purpose of assisting the agency to formulate a credit rating and agency's ratings generally are or will be publicly available);
- parties to a reorganization, amalgamation, merger, arrangement or similar business combination with an issuer, if providing such information is given in the necessary course of business to effect such a transaction; and
- parties to a private placement of an issuer, if providing such information is necessary to effect such a transaction.

The "necessary course of business" exemption does not generally cover communications with analysts, institutional investors or other market professionals.

E. Trading Restrictions and Blackout Periods

Reference is made to the Disclosure Policy of Global Alumina for a description of Global Alumina's trading restrictions and blackout periods.

3. INSIDER REPORTING

A. Insider Reports

Every insider of Global Alumina is subject to insider reporting requirements under applicable Securities Legislation.

B. Subject of Insider Reports

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Each insider of Global Alumina must disclose in his or her insider reports all securities of Global Alumina, together with derivatives and securities that are subject to puts, calls or other options, directly or indirectly beneficially owned by him or her or over which he or she exercises control or direction. For the purposes of this policy, each insider of Global Alumina is deemed to beneficially own any securities of Global Alumina owned by a company controlled by him or her or by an affiliate of such company. Areas of uncertainty should be addressed with Global Alumina's Chief Financial Officer as soon as possible.

C. Timing of Filing Insider Reports

An insider report is required to be filed by an insider:

1. upon becoming an insider and holding securities of Global Alumina at such time;
2. upon acquiring securities of Global Alumina for the first time; and
3. upon any change to an insider's holdings of securities of Global Alumina.

In accordance with applicable Securities Legislation, insider reports must be filed electronically on an online computer system known as the System for Electronic Disclosure by Insiders (the "SEDI System"). For further information concerning the SEDI System please contact Global Alumina's Chief Financial Officer.

Initial reports must be filed within 10 days of a person or company becoming an insider. Where a person or company becomes an insider by virtue of being a director or an officer of a company which has itself become an insider of Global Alumina, the first report must reflect holdings of Global Alumina securities during the previous six-month period. All changes in holdings (both beneficial and registered) must be reported, not just net changes. For reporting purposes, ownership is considered to change on the date of trade, not on the settlement date. Changes in holdings must be reported within 10 days after the trade date. Furthermore, under the SEDI System, an insider is required to file an amended insider profile if there is a change in the insider's name or the insider's relationship to Global Alumina or if the insider ceases to be an insider of Global Alumina, in each case within 10 days after the occurrence of such event. If there is any other change to the insider profile, such change must be reflected next time the insider is required to file an amended insider profile or insider report. Again, it is recommended that the insiders of Global Alumina contact Global Alumina's Chief Financial Officer with any questions.

4. CONCLUSION

Insiders of Global Alumina and other persons and companies in a special relationship with Global Alumina are prohibited from acquiring or disposing of securities of Global Alumina using material information that has not been generally disclosed and from informing other persons or companies of such information other than in the necessary course of business of Global Alumina. Global Alumina expects all insiders and such persons to conduct their securities trading and reporting activities in compliance with applicable Securities Legislation at all times.

Although this policy has been approved by the directors of Global Alumina, it is expected that the policy will evolve over time as customary practice and legal requirements change. In addition, this policy may also be amended by the directors of Global Alumina at any time as they deem appropriate.

Approved March 21, 2006