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ASI CERTIFICATION  
PERFORMANCE  
STANDARD

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PRESENTED TO

# EMIRATES GLOBAL ALUMINIUM PJSC

CERTIFICATE  
NUMBER

149

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV  
BUSINESS  
ASSURANCE  
SERVICES  
UK LTD.

DATE OF ISSUE

4 AUGUST 2021

DATE OF EXPIRY

3 AUGUST 2024

CERTIFIED SINCE

4 AUGUST 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a white background.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at*

[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)

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CERTIFICATION SCOPE

Emirates Global Aluminium PJSC, Jebel Ali site  
(UAE) including smelting and casting of aluminium,  
carbon plants, power generation, utilities and  
associated facilities.

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# SUMMARY AUDIT REPORT PERFORMANCE STANDARD

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## OVERVIEW

MEMBER NAME	Emirates Global Aluminium PJSC
ENTITY NAME	Emirates Global Aluminium PJSC – Jebel Ali
CERTIFICATION SCOPE	Emirates Global Aluminium PJSC, Jebel Ali site (UAE) including smelting and casting of aluminium, carbon plants, power generation, utilities and associated facilities.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>10 – 23 June 2021</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>20 July 2021</li></ul>
AUDIT SCOPE	<p>The audit scope covered Emirates Global Aluminium PJSC, Jebel Ali site (UAE) including smelting and casting of aluminium, carbon plants, power generation, utilities and associated facilities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>

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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

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CERTIFICATION  
PERIOD

4 August 2021 – 3 August 2024

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

4 February 2023

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CERTIFICATE  
NUMBER

149

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented systems to ensure compliance with Applicable Law to the conduct of business in all aspects headed by competent legal team supported with compliance champions across organizational functions.
1.2 Anti-Corruption	Conformance	The Entity has established and implemented systems and controls adequate to work against Corruption in its forms through Anti-Bribery and Anti-Corruption Compliance Programme. The Entity's system is designed in consistent with Applicable Law and current international standards, including Extortion and Bribery. An overview is available publicly on its website. <a href="https://www.ega.ae/en/our-sustainability/governance">https://www.ega.ae/en/our-sustainability/governance</a>
1.3 Code of Conduct	Conformance	The Entity has implemented a documented organizational Code of Conduct that includes relevant principles for environmental, social and governance performance. Declaration to the Code of Conduct is a pre-requisite to be an employee and to be partner in value chain. The Code of Conduct is a public document that is available on its website. <a href="https://www.ega.ae/media/1016/ega-code-of-conduct.pdf">https://www.ega.ae/media/1016/ega-code-of-conduct.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established an integrated policy that includes relevant commitments to environmental, social and governance practices included in ASI standard. The Policy is implemented through detailed procedures which are established as a part of Environment, Health & Safety and Social Management system. This policy is a public document that is available on its website. <a href="https://www.ega.ae/media/1721/ega0125-ega-core-policies-a4.pdf">https://www.ega.ae/media/1721/ega0125-ega-core-policies-a4.pdf</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's core policy is endorsed by the Managing Director & Chief Executive Officer (CEO). The Policy is reviewed periodically and resources are provided through the annual budgeting process.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated its core policy internally through various ways including e-mail, displays and by publishing on the intranet. The Entity has published the

CRITERION	RATING	COMMENT
		<p>Policy on its website for external communication and can be found at:  <a href="https://www.ega.ae/media/1721/ega0125-ega-core-policies-a4.pdf">https://www.ega.ae/media/1721/ega0125-ega-core-policies-a4.pdf</a></p>
2.2 Leadership	Conformance	The Entity has appointed a Sustainability Manager with overall responsibility and authority for ensuring conformance with Aluminium Stewardship Initiative (ASI) Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity maintains ISO 14001:2015 certification from an independent third party which covers all activities at Jebel Ali plant including residential area. The Certificate is available on the company website and can be found at: <a href="https://www.ega.ae/media/2400/iso-14001-consolidated-certificate.pdf">https://www.ega.ae/media/2400/iso-14001-consolidated-certificate.pdf</a>
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and is implementing a stand-alone Social Management System in a manual covering Entity's values, risk identification, risk controls and monitoring and review requirement for each social element as per Aluminium Stewardship Initiative (ASI) Performance standard.
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity has implemented a designed programme for Responsible Sourcing as part of its purchasing process, covering environmental, social and governance issues. The Entity's commitment to develop a sustainable supply chain is available on its website at:  <a href="https://www.ega.ae/en/suppliers/developing-a-sustainable-supply-chain/">https://www.ega.ae/en/suppliers/developing-a-sustainable-supply-chain/</a></p> <p>However, there are some missing controls within the Entity to provide confidence that all contractors are meeting obligations with respect to Entity's suppliers' Code of Conduct for which vendors have committed.</p>
2.5 Impact Assessments	Conformance	The Entity has a system to conduct Environment, Social, Cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities. The assessment was conducted for the currently ongoing H-Block project for the installation of energy efficient turbines.
2.6 Emergency Response Plan	Conformance	The Entity has implemented a site-specific Emergency Response Plan developed through the identification of potential emergency scenarios. The Entity ensures participation and collaboration with stakeholders including relevant external agencies and partners. The

CRITERION	RATING	COMMENT
		Entity is certified for ISO 14001:2015 and ISO 45001:2018, and has well established emergency response plans which are periodically tested through drills. Competent and dedicated fire and emergency crew is available on site 24 hours a day. <a href="https://www.ega.ae/en/about-us/our-policies-and-certifications">https://www.ega.ae/en/about-us/our-policies-and-certifications</a>
2.7 Mergers and Acquisitions	Conformance	The Entity has adequate policies, procedures and resources for performing Due Diligence on Mergers and Acquisitions (M&A) that address environmental, social and governance issues.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity maintains adequate procedures and policy commitments for managing closure, decommissioning and divestment needs as it arises from business strategy. The procedure includes a review of environmental, social and governance issues in the planning process.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity prepares and publishes an Annual Sustainability Report in accordance with GRI Standards with independent assurance for key elements. The Sustainability Report is available on company's website as a public document and can be accessed by clicking on below link: <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a>
3.2 Non-compliance and liabilities	Conformance	There are no significant fines or penalties imposed on the Entity as reported in its Annual Sustainability Report 2019 on page 105. <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a> The Entity has a process to publicly disclose information on significant fines, judgments, penalties and nonmonetary sanctions for failure to comply with Applicable Law, as one of the mandatory items in Annual Sustainability Report structure.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has adequate financial approval and due diligence systems to ensure it makes, or have made on its behalf, payments to governments only on a legal and/or contractual basis. Page 45 of the Annual Sustainability Report 2019 discloses information publicly about payments made to government, no payments made to the government other than tax expenses/returns. <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a>

CRITERION	RATING	COMMENT
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity maintains an adequate system that is publicly available to address stakeholders' complaints, grievances and requests for information relating to its operations. The Entity has a system to address employee grievances as part of its Social Management System. The Entity operates certified Management System in accordance with ISO 14001:2015 and ISO 45001:2018. The complaint handling system and request for information can be accessed via: <a href="https://www.ega.ae/en/contact-us">https://www.ega.ae/en/contact-us</a>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted a life cycle assessment of its product lines for which Aluminium is considered or used by engaging a competent third party.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity provides adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium product(s) to customers upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	The Entity does not make any public communication regarding Life Cycle Assessment (LCA) information.
4.2 Product design	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity considers recovery targets on annual basis for different grades of products to minimize the generation of scrap. The Entity re-uses/recycles 100% of the generated scrap in a controlled manner.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates scrap of different alloys and grades for recycling. The scrap is kept in bins which are provided with a bar coded label that provides the alloy code.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed an aluminium recycling strategy that includes specific activities to achieve recycling goals in a timely manner.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is a member and partner with Emirates Environment Group (EEG - a Non-Governmental Organization) to promote aluminium waste collection and recycling across the country. The Entity supports and sponsors such initiatives under EEG to increase aluminium collection quantities.

CRITERION	RATING	COMMENT
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity publishes its Annual Sustainability Report prepared in accordance with GRI standards which includes data related to Greenhouse Gas (GHG) emissions and energy use by source. The Sustainability Report for the year 2019 can be accessed on Entity's website. <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a>
5.2 GHG emissions reductions	Conformance	The Entity publishes time-bound GHG emissions reduction targets in its Annual Sustainability Report, page 65 which is available on Entity's website. <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a> The Entity has developed and implemented a Carbon Abatement Plan 2019-2023 wherein actions are determined to achieve the GHG reduction targets covering the material sources of Direct and Indirect GHG Emissions.
5.3a Aluminium Smelting (management system)	Conformance	The Entity operates its environmental management system in accordance with ISO 14001:2015 that has adequate evaluation procedures and operating controls to limit direct GHG emissions. <a href="https://www.ega.ae/media/2400/iso-14001-consolidated-certificate.pdf">https://www.ega.ae/media/2400/iso-14001-consolidated-certificate.pdf</a>
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has a documented Carbon Abatement Plan which ensures that the Scope 1 and Scope 2 GHG emissions from the production of Aluminium is at a level below 8 tonnes CO <sub>2</sub> -eq per metric tonne Aluminium by 2022.
5.3c Aluminium Smelting (after 2020)	Not Applicable	The Entity started Aluminium production in 1979 and hence this criterion is not applicable.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has quantified air emissions that have adverse effects on humans or the environment and has established programs for the reduction of these emissions in line with local regulations and own standards. The Entity has reported the emissions to air in its Annual Sustainability Report for 2019 on page 52-59. <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a>
6.2 Discharges to Water	Conformance	The Entity discharges cooling water to sea via five different discharge points and has a system to quantify



CRITERION	RATING	COMMENT
		and report these discharges. The Entity's Environmental Management System addresses controls needed to minimize adverse effects and compliance with applicable regulatory requirements. The Entity publicly reports the discharges to water in the Annual Sustainability Report on page 66-67. <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity assesses the potential and major areas where spills or leaks may occur through risk assessment and registry.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity maintains an Environmental Management System that has adequate procedures to prevent and detect spills and leakage. Bore wells for groundwater monitoring are available and tested periodically.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity's Environmental Management System has adequate procedures for reporting of spills internally and externally to stakeholders and regulators.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity's 2019 Annual Sustainability Report in page 68, includes spills that occurred detailing the impact and remediation. There were no significant reportable spills 2017 onwards. <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a>
6.5a Waste management and reporting (strategy)	Minor Non-Conformance	The Entity has documented a Waste Management Control Plan which requires application of waste mitigation hierarchy. The Entity constantly explores options for recycling/reuse of waste to reduce the landfilling of waste. The Entity needs to improve controls related to storage of different types of wastes to prevent any potential future impact to the environment and human health.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publishes an Annual Sustainability Report that contains data about quantity of hazardous and nonhazardous waste generated as well as associated waste disposal methods. Refer to page 69 to 71. <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a>
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Minor Non-Conformance	The Entity has constructed covered bunker with impervious surface which is suitable for storage of Spent Pot Lining (SPL) material and prevents the release of SPL or leachate to the environment. Due to lack of demand from its customers due to the ongoing covid-19 pandemic, the amount of SPL has exceeded the bunker storage capacity, requiring the Entity to store SPL outside the designated bunker. The Entity has started sending the SPL to the pre-processing facility in significant quantities resulting in reduction of the stockpile in 2021.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has engaged two suppliers to pre-treat Spent Pot Lining (SPL) material including carbon and refractory materials. The pre-treated material is sent to various cement plants. The technical study conducted with the cement plant demonstrated reduction in net CO <sub>2</sub> emissions due to addition of SPL, without any violation of regulatory limits for other emissions.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity does not send any Spent Pot Lining (SPL) material to landfill. It is all pre-treated and consumed in the cement industry.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	The Entity does not stockpile or send the Spent Pot Lining (SPL) for landfilling. Hence this criteria is Not Applicable.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity's policy, procedure and infrastructure ensures no possibility of discharge of Spent Pot Lining (SPL) to marine or aquatic environment.
6.8a Dross (recovery)	Conformance	The Entity maximizes the recovery of aluminium by sending all generated dross to a specialized facility operated by a third party which processes and recovers metal from dross. The Entity monitors the data regarding metal recovery rate from dross.
6.8b Dross (recycling)	Conformance	The Entity sends the entire quantity of generated dross to a third party which treats the dross residues in their

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		salt washing plant specifically designed for this purpose. The treated dross is sent to cement plant for reuse.
6.8c Dross (review of alternatives)	Not Applicable	The Entity is sending the entire dross to a third party who treats the dross residue and sends it to the cement plants for reuse. The Entity does not send any dross residue for landfilling and hence this criteria is not applicable.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has a water balance chart that identifies and maps its water withdrawal and use by source and type. The Entity draws only seawater.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water related risks as part of its Environmental Management System. Though risks are evaluated as "low", mitigation actions have been suitably implemented.
7.2a Water management (management plans)	Not Applicable	The water related risk are not identified as material risk as per environmental risk assessment as the Entity is located within an arid, desert environment with no sources of freshwater. This criterion is hence not applicable. However, there are water related controls and monitoring programs implemented within the Entity's environmental management system.
7.2b Water management (monitoring)	Not Applicable	The Entity has not identified any water related risks as a material risk due to which the requirement to implement water management plans and monitor its effectiveness is not applicable. However, there are water related controls and monitoring programs implemented within the Entity's environmental management system.
7.3 Disclosure of water usage and risks	Conformance	The Entity has publicly disclosed its water withdrawal, use and risks in its 2019 Annual Sustainability Report, page 66. <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence through a specialist consultant. The scope of the study included setting terrestrial and marine biodiversity baseline, critical habitat assessment, consideration of necessary mitigation efforts and opportunities for enhancements.

CRITERION	RATING	COMMENT
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The Environmental Impact Assessment (EIA) report of the facility as well as the Biodiversity assessment report concluded that the biodiversity related risks are not material to the Entity. Hence the requirement to have a biodiversity action plan with time bound targets is "not applicable". The Entity however intends to implement suggestions from the biodiversity assessment report to further mitigate the biodiversity related impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The Environmental Impact Assessment (EIA) report of the facility as well as the Biodiversity assessment report concluded that the biodiversity risks are not material to the Entity. Hence the requirement to have a biodiversity action plan designed in accordance with the Biodiversity Mitigation Hierarchy is "Not applicable". The Entity engaged with relevant stakeholders to conduct the biodiversity assessment and to recommend mitigation actions for improvement.
8.2c Biodiversity management (reporting)	Not Applicable	The Entity has disclosed the biodiversity outcomes on page 72 of the 2019 Annual Sustainability Report. <a href="https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf">https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf</a>
8.3 Alien Species	Conformance	The Entity has conducted a biodiversity assessment through a specialised consultant. The scope included assessment of accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity. The existing controls were considered sufficient to mitigate the risk of introduction of alien species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity's core policy has commitment to respect Human Rights of their Employees, those in their value chain, and the communities in which they operate. The

CRITERION	RATING	COMMENT
		policy is deployed through Social Management System.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has defined a due diligence process which incorporates a risk-based approach, focusing efforts where the risk of adverse human rights impact is most significant.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has not identified to have caused or contributed to adverse Human Rights impacts but has the process to cover this in line with its core policy and Code of Conduct.
9.2 Women's Rights	Conformance	The Entity has implemented a Policy and associated procedures to ensure respect for the rights and interests of women. The practices are consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW).
9.3 Indigenous Peoples	Not Applicable	The Entity is located in a specially created industrial zone where there was no habitation in the past, hence there are no known Indigenous People living near the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous People and hence Free Prior and Informed Consent (FPIC) is not applicable.
9.5 Cultural and sacred heritage	Not Applicable	The Entity was built in a specially developed industrial area on desert land. The Environment Impact Assessment (EIA) of the project concluded that there is no likely sacred or cultural heritage site and value within the Entity's area of influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity was constructed in a specially created industrial zone where there were no people living. The Entity's Environmental Impact Assessment (EIA) confirmed that there was no resettlement required.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity was constructed in a specially created industrial zone where there were no people living. The Entity's Environmental Impact Assessment (EIA) confirmed that there was no resettlement required.
9.7a Local Communities (rights and interests)	Not Applicable	There are no local community in the Entity's area of influence since it is located in a dedicated industrial zone.
9.7b Local Communities (impacts)	Not Applicable	There are no local community in the Entity's area of influence since it is located in a dedicated industrial zone.

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Not Applicable	There are no local community in the Entity's area of influence since it is located in a dedicated industrial zone.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has an adequate policy and associated controls for not contributing to armed conflict or Human Rights abuses in conflict-affected and high-risk areas either directly or through supply chain.
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity has engaged a private security service provider and ensures that security practices including the Voluntary Principles on Security and Human Rights, are adhered to in line with local regulatory requirements, recognised standards and good practice.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	Freedom of association is restricted under UAE law. However, the Entity has an open culture where employees and contractors can provide feedback associated with any aspect of their employment or work.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	Collective bargaining is restricted under UAE law. The Entity has suitable alternate processes where employees and contractors can provide their feedback on aspects of employment and work that are addressed for resolution.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has various alternative means of association for Workers such as Employee surveys, Town hall meetings, Tool box talks, Health Safety and Environment (HSE) meetings and Residential area Mosque tent meetings.
10.2a Child Labour (minimum age)	Conformance	The Entity's policies and employment rules are in place to prevent incidences of Child labour. The minimum age for workers to work in the Entity is 18 years. The Entity ensures implementation of this Policy across its supply chain through supplier declaration and due diligence checks.
10.2b Child Labour (hazardous)	Conformance	The Entity's policies and employment rules are in place to prevent engagement of Child Labour in any hazardous process. Minimum age for workers to work in the Entity is 18 years. The Entity ensures implementation of this policy across its supply chain through supplier declaration and due diligence checks.

CRITERION	RATING	COMMENT
10.2c Child Labour (worst forms)	Conformance	The Entity's policies and employment rules are in place to prevent incidences of Child labour. The minimum age for workers to work in the Entity is 18 years. The Entity ensures implementation of this Policy across its supply chain through supplier declaration and due diligence checks.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has an adequate policy and associated controls for preventing human trafficking either directly or through recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has policies and procedures which ensure that the Entity does not require any deposits of any sort from its Employees. The Entity ensures deployment of this policy across its supply chain through supplier declarations.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has policies and procedures which ensure that the Entity does not require any deposits of any sort from its Employees. The Entity ensures deployment of this policy across its supply chain through supplier declarations.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has policies and controls to ensure workers are not in debt bondage or force them to work in order to pay off a debt. The Entity ensures implementation of this policy across its supply chain through supplier declaration and due diligence checks.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has processes to ensure the free movement of workers either in workplace or in on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has a policy and associated procedures that do not allow the retention of original documents of workers.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's employment conditions for termination of employment are in line with UAE labour law.
10.4 Non-Discrimination	Conformance	The Entity has policies and controls in place to avoid discrimination practices in all forms of business conduct.
10.5 Communication and engagement	Conformance	The Entity has implemented an open communication and engagement process with workers regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment. The communication and engagement channels include but are not limited to employee surveys, town hall meetings, tool box talks, Environment Health and Safety (EHS) meetings,

CRITERION	RATING	COMMENT
		employee suggestion scheme, grievance handling process and an employee care helpline.
10.6 Disciplinary practices	Conformance	The Entity has a transparent and published disciplinary processes in line with national labour laws. Disciplinary actions are implemented in an impartial manner through the Employee relation process.
10.7a Remuneration (living wage)	Conformance	The Entity conducts an annual compensation survey and ensures competitiveness in pay and compensation and aims to be the industry benchmark.
10.7b Remuneration (method of payment)	Conformance	The Entity provides wage payments before the end of each month through Entity's payroll system. No instance of delay in wage payments has been recorded to date. The wage slips are provided to each Employee which contains the details of the wages including overtime if any.
10.8 Working Time	Conformance	The Entity has published an employee handbook that prescribes the working hours, overtime, weekly off, public holidays, annual leave, etc. and is in compliance with local laws.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety and is endorsed by the Chief Executive Officer. <a href="https://www.ega.ae/en/about-us/our-policies-and-certifications/">https://www.ega.ae/en/about-us/our-policies-and-certifications/</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety and is endorsed by the Chief Executive Officer. <a href="https://www.ega.ae/en/about-us/our-policies-and-certifications/">https://www.ega.ae/en/about-us/our-policies-and-certifications/</a>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes occupational health and safety and a commitment to comply to all Applicable Law to health and safety and international standards. <a href="https://www.ega.ae/en/about-us/our-policies-and-certifications/">https://www.ega.ae/en/about-us/our-policies-and-certifications/</a>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety and is endorsed by the Chief Executive Officer. <a href="https://www.ega.ae/en/about-us/our-policies-and-certifications/">https://www.ega.ae/en/about-us/our-policies-and-certifications/</a>



CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety and is endorsed by the Chief Executive Officer. <a href="https://www.ega.ae/en/about-us/our-policies-and-certifications/">https://www.ega.ae/en/about-us/our-policies-and-certifications/</a>
11.3 Employee engagement on health and safety	Conformance	The Entity maintains certification to ISO 45001:2018. Employee engagement is achieved through risk assessments, Employee surveys, safety committees, departmental meetings, an 'EHS App' for reporting unsafe acts and unsafe conditions and violations to Entity workplace safety rules.
11.4 OH&S performance	Conformance	The Entity maintains certification to ISO 45001:2018. The Entity evaluates its Occupational Health and Safety performance using leading and lagging indicators.

#### **Document Control and Version History**

Revision	Date	Notes
0	4 August 2021	Initial Certification Audit – Full Certification