



Business Continuity Management System Operating Policy

1. PURPOSE

Business Continuity enhances an organisation's resilience by establishing robust strategies to help it respond to, and recover from, disruptive incidents in an effective and efficient manner. EGA's Business Continuity Management System (BCMS) ensures that effective plans are implemented and maintained to responsibly manage emergencies, crises, and business disruption events.

Emirates Global Aluminium ("EGA") recognises the importance of having an effective BCMS and is committed to ensuring that all the necessary activities are in place and maintained, including the development of documentation and procedures, generate staff awareness, conduct training and exercises, and maintain suitable incident response facilities and equipment.

2. SCOPE

This operating policy is applicable to the following EGA Group entities. Any other entity within the Group and not mentioned below remains outside the scope of the BCMS.

- Dubai Aluminium PJSC (JA)
- Emirates Aluminium Company PJSC (AT)
- Al Taweelah Alumina LLC (ATA)
- EGA America Inc.

Each business function within EGA Group entities as mentioned above is accountable to deploy satisfactory and appropriate levels of business continuity within their area if appropriate. As partners to the business areas, the role of the Business Continuity Management Team is to support departments to achieve their Business Continuity objectives in compliance with the mandatory NCEMA 7000:2021 standard and continuous improvement.

3. COMPLIANCE

The UAE Business Continuity standard NCEMA 7000:2021 is a mandatory standard which prioritized business areas within EGA must comply with. The Business Continuity Team will periodically check compliance with this operating policy.

4. BCM OBJECTIVES

The BCM objectives are to:

- 4.1. Minimise business disruptions, financial loss and legal liability by having business continuity plans to proactively respond to disruptions, restore business at acceptable capacity, within acceptable timeline and resume business as usual.
- 4.2. Enable an effective and scalable response to no-notice short duration incidents (e.g. Operational disturbance) and prolonged events (e.g., pandemic) by having a robust incident response structure, appropriate response teams and suitable response plans.
- 4.3. Identify threats and risks to the business through EGA Enterprise Risk Management framework, establishing controls and contingencies aligned with the organizational risk appetite and tolerance.
- 4.4. Generate BCM awareness through e-learning modules to support the organization to meet its strategic objectives and growth despite disruptions.
- 4.5. Maintain a robust crisis communication plan to protect reputational damage by distributing information appropriately in a timely, accurate, responsible, and sensitive way to all stakeholders during a crisis.

- 4.6. Ensure shareholder value protection and business resilience by complying with NCEMA 7000:2021 and ISO international standards as best practice thereby enhancing resilience to business disruptions.
- 4.7. Maintain a robust exercise program over a period of five years to cover scenarios across prioritized processes.
- 4.8. Ensure continuous Improvement of Business Continuity by implementing audit and management review recommendations, preventive and corrective actions resulting from exercises and incidents.

5. RESPONSIBILITY / PERSONNEL INVOLVED

Personnel Involved	Responsibility
Top Management	Overall responsibility of the Business Continuity Management System. CEO assumes overall ownership of BCMS
Employees, Third party and contractors	Understanding, agreeing, and complying with this Business Continuity operating policy.
Functional Owners	Accountability to ensure effectiveness of this Business Continuity operating policy.
BC Coordinators	Implementation of this Business Continuity operating policy.
Business Continuity Management Team	Partner with the areas to develop and implement this Business Continuity operating policy to ensure compliance with the NCEMA standard and provide EGA with robust planned response governance and capability.

6. GUIDING PRINCIPLES

- 6.1. Developing and maintaining a BCMS which covers conceivable and non-standard operational and business situations at EGA and its subsidiary companies and where EGA has legal or regulatory, ethical or community responsibility
- 6.2. Regularly reviewing our plans and subsequent actions to ensure that they remain relevant, robust and effective.
- 6.3. Work closely with all stakeholders in the development and execution of our responses to emergencies, crises and business disruption events. Coordinating communication of information to stakeholders to ensure appropriate and relevant information is disseminated in a timely and efficient manner.
- 6.4. Continuously improving our BCMS by identifying and implementing lessons learned from previous exercises and incidents.

7. REVIEW

The BCMS Policy will be reviewed on an annual basis and communicated to all employees and relevant interested stakeholders.

8. REFERENCES

EGA.FIN.BCM.GEN.01.01.01 Business Continuity Management Systems Manual EGA

¹ EGA America Inc. do not have their own Incident Response Structure and framework, however they fall under the Marketing & Sales team structure