



# Modern Slavery Statement

April 2025



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# Introduction

**Human rights refer to the universal entitlements that ensure every individual is treated with dignity and equality, and encompass a broad range of civil, political, economic, social, and cultural rights.**

Emirates Global Aluminium PJSC (EGA) is committed to respecting the fundamental human rights of its employees, those in EGA's value chain, and individuals in the communities in which EGA operates.

EGA's Modern Slavery Statement (Statement) aligns with the Aluminium Stewardship Initiative (ASI) Performance Standard Version 3<sup>1</sup> requirement to publicly disclose actions taken to address modern slavery. This Statement also serves as a voluntary disclosure, informed by the principles of the UK Modern Slavery Act 2015 (UK Act), the Australian Modern Slavery Act 2018 (Australian Act), and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2022 (Canadian Act).

Modern slavery is a gross violation of fundamental human rights and is present in every country in the world.<sup>2</sup> For the purposes of this Statement, modern slavery refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.<sup>3</sup> This type of exploitation can occur in various forms including slavery, forced or compulsory labour, debt bondage, human trafficking, and the worst forms of child labour.<sup>4</sup> EGA is committed to preventing modern slavery from occurring within its own business and its supply chain, and expects all its contractors, suppliers, and other business partners to do the same.

The Statement is prepared based on information collected from EGA's operational sites in the United Arab Emirates (UAE), Guinea Alumina Corporation SA (GAC), and Leichtmetall Aluminium Giesserei Hannover GmbH (EGA Leichtmetall). This Statement covers EGA's global and domestic processes for assessing and mitigating modern slavery risks across its operations and supply chains for the reporting period of January 1, 2024, to December 31, 2024. EGA is committed to providing an annual update on its efforts to combat modern slavery. EGA has collaborated with external experts to develop this statement, leveraging their specialised knowledge and insights into modern slavery risks and best practices to mitigate these.

All references in this Statement to "EGA" and "the Company" refer to EGA's operational sites in the UAE as well as GAC and EGA Leichtmetall. EGA completed the acquisition of Spectro Alloys Corporation at the end of the third quarter of 2024, and it is not included in the scope of this statement. Additionally, EGA owns and operates warehouses and storage facilities as part of its integrated aluminum production and supply chain. These facilities are not covered in this inaugural Modern Slavery Statement, but will be addressed in future reports.

## EGA's Business & Supply Chain

**EGA is headquartered in Abu Dhabi in the United Arab Emirates and is the world's largest 'premium aluminium' producer.**

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<sup>1</sup> <https://aluminium-stewardship.org/asi-standards/performance-standard>

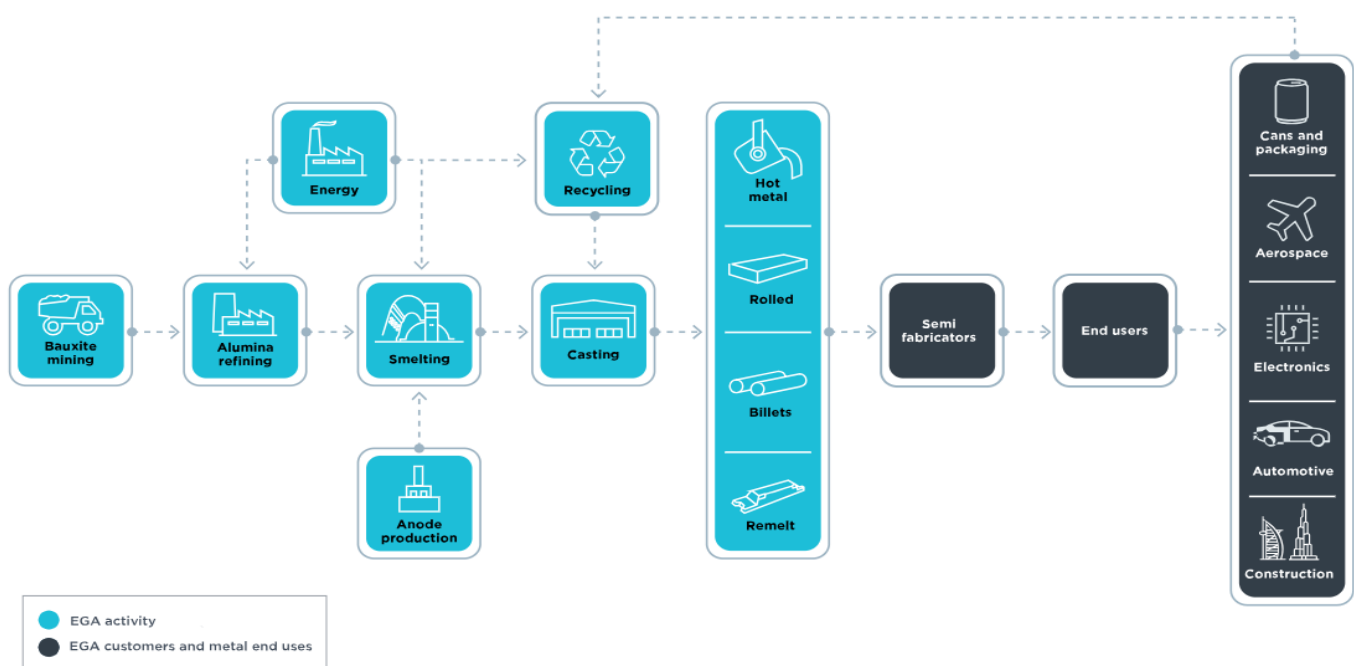
<sup>2</sup> <https://www.walkfree.org/global-slavery-index/>

<sup>3</sup> As is defined by WalkFree, an international human rights group focussed on the eradication of modern slavery. <https://www.walkfree.org/what-is-modern-slavery/>

<sup>4</sup> This reflects the definitions of modern slavery outlined by the International Labour Organization, the UK Modern Slavery Act, the Australian Modern Slavery Act, and the Canadian Modern Slavery Act.

EGA produces about four percent of the total world production, accounting for nearly half of the aluminium produced in the Gulf region. EGA is involved in all stages of the aluminium value chain, from bauxite mining and alumina refining to the production of cast metal and aluminium recycling.

EGA's operations in the UAE include alumina refining and aluminium smelting and casting. Since 2013, EGA also has direct ownership of an active bauxite mine in Guinea through its subsidiary, GAC. In the first half of 2024, EGA acquired Leichtmetall, a lightweight aluminium metal producer based in Germany. Towards the end of the third quarter of 2024, EGA completed the acquisition of Spectro Alloys Corporation, an aluminium recycling company based in the United States. Given that this acquisition occurred towards the end of the reporting period, Spectro Alloys Corporation has not been included in the scope of this statement.



## EGA's Value Chain

### EGA's Own Operations

#### UAE

EGA's headquarters and largest operational site is located in Al Taweelah, Khalifa Industrial Zone Abu Dhabi. The Al Taweelah site has an alumina refinery, a smelter, a carbon plant, and a casthouse, as well as its own power and desalination plants to support operations. EGA also operates a smelter in Jebel Ali, Dubai. The Jebel Ali site has a smelter, a carbon plant, and a casthouse, and a power and desalination plant. In addition, the Company has three dedicated berths for the import of raw materials by ship – two at Jebel Ali Port in Dubai and one at Khalifa Port in Abu Dhabi.

EGA's UAE operations are supported by a diverse workforce, comprising a majority of migrant workers. EGA only employs non-nationals who hold valid work visas, sponsored by EGA, or alternative work permits that legally authorise their employment in the country. Any local labour contracting agencies that EGA works with to recruit global talent are selected through a competitive tender and after EGA has undertaken a thorough evaluation of the company.



## Guinea

EGA's subsidiary GAC operates a bauxite mine and port facilities in Guinea. Once mined, the bauxite is transported by rail to GAC's port facilities on the Atlantic coast and shipped to EGA's operations in the UAE and other customers around the world.

The workforce at GAC consists of a mix of locally recruited workers and migrant workers. The majority of workers at GAC are subcontracted. GAC ensures the eligibility for work during the employee recruitment process, including a review of visa and work permit requirements. For the subcontracted workers at GAC, EGA's Responsible Sourcing Policy and Responsible Sourcing Standard apply and must be signed by suppliers. GAC confirms suppliers' commitment to ensuring their workers' eligibility to work and conducts thorough evaluations of these contractors' compliance with legal requirements for work permits and visas, as well as audits, if EGA deems necessary.

## Germany

In 2024, EGA acquired Leichtmetall, a German aluminium company that operates a plant in Hannover, Germany. EGA Leichtmetall produces high-strength recycled aluminium for customers across Europe, and particularly in Germany, Italy and France. Leichtmetall ensures that its staff holds valid legal permits to allow them to work and reside in Germany.

## EGA's Supplier Network

EGA relies on an extensive network of suppliers to provide goods and services, including raw materials such as bauxite, alumina, oil and gas, chemicals, petrochemicals, and technologies. This global supplier network spans countries such as Guinea, Australia, China, India, Qatar and Vietnam.

EGA works with numerous contractors to supply workers for its operations. Approximately 10 percent of the individuals working in EGA's UAE operations are contracted workers. In Guinea, approximately 96 percent of mining work is conducted by contracted workers.

## EGA's Customer Base

EGA serves a diverse customer base of over 400 customers across more than 50 countries. The Company's aluminium products are used in a wide range of industries, including construction, automotive, packaging, aerospace, and electronics.

# EGA Governance of Modern Slavery Risk

## International Frameworks and Guidance

EGA's approach to managing human rights risks, including modern slavery and forced labour, is guided by international standards and frameworks. These include the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD Due Diligence Guidance for Responsible Business Conduct, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the ILO conventions, the Ten Principles of the UN Global Compact, the Women's Empowerment Principles, and the Voluntary Principles on Security and Human Rights. EGA operations in UAE, Guinea and Germany are also certified for Aluminium Stewardship Initiative (ASI) Performance Standard. UAE Operations are working towards further certification against version 3 of the standards in 2025.

## EGA's Policies, Standards, & Processes

EGA recognises that committing to global standards is effective only when supported by consistent implementation of robust policies. EGA's public commitments<sup>5</sup> to responsible business is reflected in its Core Policies, which cover environmental, social, and governance (ESG) criteria.

EGA's **Core Policies** reflect a commitment to respecting the fundamental human rights of employees, individuals within the value chain, and individuals in the communities where EGA operates, as well as ensuring responsible sourcing across the value chain.

The Company's **Code of Ethics** reinforces this commitment, and outlines due diligence expectations for business partners and suppliers, and specifies that suspicions of modern slavery, child labour, or other human rights abuses should be reported to EGA's Responsible Sourcing Team or the Ethics & Business Integrity Team.

EGA's **Responsible Sourcing Policy** further demonstrates the Company's dedication to sourcing materials, goods, and services in alignment with the UNGPs, OECD Guidance for Responsible Business Conduct, and other international frameworks, fostering appropriate due diligence processes throughout the supply chain. EGA's Responsible Sourcing Policy is implemented through EGA's Responsible Sourcing Standard which is communicated to all suppliers. All EGA internal policies on human rights, responsible sourcing as well as other key social issues including health and safety are consolidated through a detailed social management system, providing a framework for consistent application and monitoring across its operations.

### EGA's Responsible Sourcing Standard

EGA's **Responsible Sourcing Standard** (the Standard) outlines the specific expectations for EGA suppliers in line with the Responsible Sourcing Policy. The Standard is publicly available<sup>6</sup> and communicated to all suppliers. EGA requires suppliers to confirm that they have read and understood the Standard.

The Standard encompasses requirements for legal compliance, overall business conduct, and managing human rights risks. It addresses impacts in the workplace, within communities, and in sourcing materials. The Standard stipulates that suppliers implement their own policies, due diligence processes, and reporting procedures proportionate to their size.

### Risk-based due diligence

EGA's due diligence process for suppliers incorporates a risk-based approach, prioritising efforts where the risk of adverse human rights impacts is most significant.

All EGA's suppliers are required to provide reasonable assistance to EGA or external experts authorized by EGA to visit facilities for screening, audits, and assessments. EGA engages third-party experts to conduct comprehensive audits and assessments aimed at identifying and mitigating risks. Depending on the risk profile of potential or existing supply chain partners, EGA collaborates with third-party social auditors to perform thorough audits of suppliers and assess compliance with the Responsible Sourcing Standard. These audits examine labour practices, recruitment processes, and working and living conditions through site and residential facility visits, employee interviews, and a review of practices.

Leichtmetall, as a recent acquisition, follows a different process to EGA's due diligence framework at this time.

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<sup>5</sup> [www.ega.ae/en/about-us/our-policies-and-certifications](http://www.ega.ae/en/about-us/our-policies-and-certifications)

<sup>6</sup> <https://www.ega.ae/media/clapfyhb/ega000183-responsible-sourcing-standards-may-2023.pdf>

All EGA Leichtmetall suppliers are based in the EU and the UK. EGA Leichtmetall also uses a risk-based approach to conduct social audits, assessing high-risk suppliers' social responsibility goals and risks related to human rights and modern slavery.

The Company publicly reports data regarding supply chain due diligence in EGA's annual sustainability report<sup>7</sup>.

## Risk Context & Ongoing Due Diligence

### Risk Context

EGA recognises the critical importance of the UN Guiding Principles on Business and Human Rights (UNGPs) in understanding and addressing modern slavery risks. In line with the UNGPs, EGA commits to understanding how its actions can cause, contribute to, or have a direct linkage to the perpetuation of modern slavery.

Due to the nature of EGA's work and the geographical contexts of some of its operations and supplier networks, EGA recognises that elements of its direct operations and value chain may carry risks of modern slavery.

#### Nature of work

Mining and heavy industry are core sectors of EGA's operations and value chain. These sectors often involve manual and auxiliary labour that relies on lower-skilled workers.

EGA will continue to deepen its understanding of the risks of modern slavery by implementing targeted measures. Starting in 2026, EGA will conduct asset-level risk assessments at least every five years (or sooner if there are material changes in business operations, indications of control gaps, or other significant developments) and will collaborate with external experts in these areas. Over the course of 2026, EGA will further enhance its understanding of modern slavery risks in additional areas of its value chain, including shipping and logistics, where offshore work poses higher risks, and PPE manufacturing, where demand for precarious labour can lead to exploitative conditions.

#### Geographical contexts

EGA acknowledges that many workers in its operations and supply chain come from or work in countries with high scores on the Global Slavery Index, putting them at a higher risk of modern slavery. Additionally, EGA recruits employees globally, as do its third-party contracting companies and suppliers, some of which use recruitment agencies. EGA understands that the use of a contracted workforce and recruitment agencies may increase the risk of forced labour, particularly for migrant workers. In response, EGA has implemented and is committed to continuously improving a set of policies, procedures, and practices to reduce modern slavery risk in its operations and value chain, as discussed in this Statement.

### Ongoing Due Diligence

In line with its policies, processes, and commitments under the ASI Performance Standards, EGA conducts ongoing monitoring of risks relating to modern slavery and human rights more broadly. This ongoing monitoring includes internal and third-party audits, Human Rights Impact Assessments (HRIAs), and other risk assessments on environmental and social topics.

EGA's operations in the UAE, and GAC in Guinea undergo independent third-party checks for forced labour as part of surveillance and recertification audits for the ASI Performance Standards. The results are made publicly

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<sup>7</sup> <https://www.ega.ae/en/sustainability/sustainability-reports>

available on the ASI website<sup>8</sup>, and each entity currently holds full certification against ASI Performance Standard Version 2. EGA's policies and processes in the UAE will undergo an audit against ASI Performance Standard Version 3 in 2025 which includes expanded social requirements, including the requirement to publicly disclose an annual modern slavery statement detailing actions to address modern slavery.

In 2024, EGA conducted a HRIA of its UAE operations to identify potential human rights risks linked to its operations and supply chain and identify potential gaps within its existing social management system and associated controls. This Assessment covered the risk of modern slavery, including forced labour and child labour. Preliminary findings from the HRIAs were presented to EGA's ESG Committee and Executive Committee in Q4 2024. The full findings will be presented in 2025 and will inform the development of a Human Rights Management Plan in 2026.

In 2024, GAC underwent independent and internal audits against the findings from previous social and environmental impact assessments. The findings from these assessments will inform updates to GAC's Social and Environmental Management Plans.

EGA Leichtmetall's efforts to address modern slavery risks in 2024 were informed and guided by insights from its ongoing risk assessments, which evaluate potential human rights violations within its supply chain.

EGA will continue to enhance its capacity to screen, assess, and audit gaps in human rights management in its broader supply chain to allow continued work on mitigating and preventing risks of modern slavery. In the instance that modern slavery or other human rights impacts are identified, whether through due diligence processes – including HRIAs and ASI audits – or other mechanisms, EGA is committed to addressing these impacts proportionate to its leverage and responsibility. See Feedback & Remedy for more.

## Feedback & Remedy

EGA provides the Your Voice report line, a dedicated phone line offering anyone an opportunity to raise concerns in confidence. EGA and GAC workers are made aware of the reporting line during inductions and during annual Code of Ethics training. EGA plans to make this service available to the workforce of newly acquired EGA Leichtmetall in 2025.

Details regarding Your Voice are published on EGA's website and included in the Responsible Sourcing Standard that is communicated to all suppliers.

The Your Voice platform is hosted by an external provider bound by strict obligations of confidentiality. It is available 24/7, in multiple languages, and the reporter has the option to remain anonymous. EGA's Ethics & Integrity team works to carry out an analysis of any reports, and utilizes a structured escalation process to determine subsequent actions, including, as needed, providing appropriate remedy.

In Guinea, in addition to Your Voice, all workers employed by GAC's contracting companies are also provided access to a phone line that they can use to share grievances. GAC's Legal & Compliance Team engages with relevant internal teams, departments, and external entities to ensure appropriate actions are taken until concerns

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<sup>8</sup> Emirates Global Aluminium PJSC: <https://aluminium-stewardship.org/wp-content/uploads/2023/06/ASI-Summary-Audit-Report-EGA-PJSC-Certificate-27-PS-Rev-4.pdf> Guinea Alumina Corporation: <https://aluminium-stewardship.org/asi-certifies-emirates-global-aluminium-pjsc-subsiary-guinea-alumina-corporation-sa-against-performance-standard> Leichtmetall Aluminium Giesserei Hannover GmbH: <https://aluminium-stewardship.org/wp-content/uploads/2023/07/ASI-Summary-Audit-Report-Leichtmetall-Aluminium-Giesserei-Hannover-Certificate-251-PS-Rev-1.pdf>



raised by workers are resolved. GAC's Industrial Relations Department in Guinea engages with all grievances raised by unions representing full-time employees and contracted workers.

EGA also has a system in place to address community grievances in the UAE and Guinea. In the UAE, EGA provides a 24/7 dedicated phone line for community grievances, with details published on the EGA website, managed by the in-house CSR Team. In Guinea, GAC has implemented an ASI-compliant operational grievance mechanism, with a network of community liaison officers in local communities who record grievances and escalate them to the Community Relations Team. A 24/7 phone line is also available, with details displayed on posters within communities.

EGA Leichtmetall provides a comprehensive online anonymous whistleblower system, hosted by an external provider. Details are shared on notice boards within the facility. All reports are handled confidentially by independent compliance managers.

In instances where EGA's due diligence processes or feedback channels surface suspected or actual violations of human rights, including violations related to modern slavery, EGA is committed to investigating the impact and taking appropriate action in line with the extent to which the harm is attributable to EGA and what EGA's leverage is over the harm. EGA is committed to providing or assisting with providing effective remedy for human rights impacts, including those related to modern slavery.

## Training & Capacity-Building

At EGA, the ethical conduct of employees is prioritised through comprehensive annual training on the Code of Ethics. EGA's Code of Ethics includes examples of scenarios that may highlight indicators of forced labour and modern slavery.

As part of its commitment to addressing modern slavery, EGA works closely with business stakeholders and high-risk suppliers to enhance workers' conditions, with a focus on accommodation, transport, and health and safety. EGA is also continuously improving its internal training processes, ensuring that human rights considerations and sensitivities are fully integrated into the information-gathering methods used during onsite audits and assessments.

## Leadership Accountability

EGA's Board of Directors oversees ESG issues, including the identification, assessment, and management of environmental and social considerations such as climate change, human rights (including modern slavery), and corporate social responsibility (CSR) policies.

EGA's Executive Committee is ultimately accountable for ensuring that suitable procedures are established to identify, assess, manage, remediate, and report any modern slavery risks.

EGA's Chief ESG & Sustainability Officer is accountable for and annually reviews and approves EGA's global human rights policy identifying the standards that EGA's global activities should adhere to. EGA's subject matter experts provide relevant expertise to support the identification of risks, suitable controls, as well as monitoring and reporting on progress.

EGA's General Counsel and Head of Ethics & Business Integrity is accountable for and periodically reviews and approves EGA's Code of Ethics. EGA's Ethics & Business Integrity Team is responsible for providing adequate training and communication to EGA employees about their responsibilities under the Code, monitoring compliance, and investigating reported breaches.

EGA's Chief Supply Chain and Business Development Officer is accountable for EGA's responsible sourcing efforts. EGA's Responsible Sourcing Team is responsible for communicating EGA's human rights requirements to potential and existing suppliers. The team oversees appropriate due diligence of suppliers on human rights and modern slavery-related risks, with the support of the Ethics & Business Integrity Team.

EGA's Executive Vice President Human Capital is accountable for EGA's recruitment, remuneration, and other labour practices. EGA's Human Capital Team is responsible for establishing appropriate policies regarding recruitment, remuneration, and working hours for EGA employees, as per Delegation of Authority.

## Approval



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Abdulnasser Bin Kalban  
Chief Executive Officer



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Najeeba Hassan Al Jabri  
Chief ESG & Sustainability Officer