
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALUMINIUM BAHRAIN B.S.C (ALBA)

CERTIFICATE
NUMBER

63

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

15 JANUARY 2020

DATE OF EXPIRY

14 JANUARY 2023

CERTIFIED SINCE

15 JANUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John'.

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CERTIFICATION SCOPE

Production and marketing of primary aluminium from alumina, calcinations of petroleum coke, water desalination, anode manufacturing, smelting, casting and captive power generation.

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at
www.aluminium-stewardship.org

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Aluminium Bahrain B.S.C. (Alba)
ENTITY NAME	Aluminium Bahrain B.S.C. (Alba)
CERTIFICATION SCOPE	Production and marketing of primary aluminium from alumina, calcinations of petroleum coke, water desalination, anode manufacturing, smelting, casting and captive power generation.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Smelting, Casthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">First Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none">3 . 7 November 2019
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">20 November 2019
AUDIT SCOPE	<p>The audit scope covered the Alba Calciner and Alba Smelter. Production and marketing of primary aluminium from alumina, calcinations of petroleum coke, water desalination, anode manufacturing, smelting, casting and captive power generation.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Smelting, Casthouses <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification

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.

CERTIFICATION
PERIOD

15 January 2020 - 14 January 2023

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

15 July 2021

CERTIFICATE
NUMBER

63

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	The Entity needs to strengthen its compliance evaluation process to proactively demonstrate its compliance to applicable Social, Environmental, Governance and Safety regulations.
1.2 Anti-Corruption	Conformance	The Entity has established a Code of Conduct, which includes policy statements on bribery and corruption, which is communicated to all employees and contractors through regular trainings. It has assessed the anti-corruption risks and established a confidential bribery and corruption reporting process available to all stakeholders.
1.3 Code of Conduct	Conformance	The Entity has established the Code of Conduct document and has effectively implemented it by providing suitable training to all the workers having access to the workplace and by creating awareness across its supply chain. https://www.albasmelter.com/IR/CorporateGovernance/Pages/default.aspx .
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established, implemented and maintained Environmental, Social and Governance policy for its existing operations and new projects. https://www.albasmelter.com/investments/Pdf/Safety%20Policy.pdf https://www.albasmelter.com/Corporate%20Responsibility/CSR/Pages/default.aspx .
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has demonstrated leadership commitment by endorsing and periodically reviewing various policies covering Environmental, Social and Governance factors and by providing resources as needed for its implementation.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has effectively communicated the Environmental, Social and Governance policy to its stakeholders. https://www.albasmelter.com/investments/Pdf/Safety%20Policy.pdf https://www.albasmelter.com/Corporate%20Responsibility/CSR/Pages/default.aspx .

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has nominated one of its senior management personnel (Director of SHE, Fire and Security) as having overall responsibility and authority for ensuring conformance with ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity maintains ISO 14001:2015 & ISO 45001:2018 certifications which is subjected to periodic audits by an independent accredited certification body. https://www.albasmelter.com/investments/Environment/Documents/ISO14001.pdf .
2.3b Environmental and Social Management Systems (social)	Minor Non-Conformance	The Entity needs to document and implement social management system covering requirements related to setting social objectives and targets, conducting management reviews on social performance, conducting internal audits of social management system etc.
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity requires all suppliers to accept the Code of Conduct before registration. Code of conduct is published on Alba website.</p> <p>The Entity has established various policies and procedures related to supplier control covering Environmental, Social and Governance issues as applicable, however the Entity needs to bring clarity as to how these controls are implemented while registering new suppliers as the registration procedure ACOP 1/56 does not give reference to these controls and does not specify the documented information required to be maintained as an evidence of applying these controls during registration.</p> <p>The registration policy on the website though specifies the requirements related to background checks on current and past financial performance; Safety, Health and Environment policies and standards; HR policies and operating policies and procedures, nature of business and clientele as part of pre-qualification requirements.</p> <p>The Entity also need to conduct due diligence on vendors (local/overseas) associated with supply of Environmentally Sensitive goods in line with ACOP 23 Environmental purchasing requirement.</p>

CRITERION	RATING	COMMENT
		https://www.albasmelter.com/Procurement/Pages/GeneralGuidelines.aspx .
2.5 Impact Assessments	Conformance	The Entity has conducted Environment and Social Impact Assessment (ESIA) for all new projects which also covers cultural and Human Rights impacts. The recommendations are implemented and monitored periodically. https://www.albasmelter.com/Corporate%20Responsibility/CSR/Documents/Alba%20Line%20%20Supplementary%20ESIA.pdf .
2.6 Emergency Response Plan	Conformance	The Entity has developed site specific emergency response plans based on ISO 14001 and ISO 45001 requirements in collaboration with potentially affected stakeholder groups such as workers and their representatives including contractors.
2.7 Mergers and Acquisitions	Conformance	The Entity is aware of and committed to implement a review of Environmental, Social and Governance issues in the Due Diligence process for mergers and acquisitions using references from International Financial Corporation (IFC) Performance Standard and the UN Guiding Principles on Business and Human Rights.
2.8 Closure, Decommissioning and Divestment	Conformance	Entity has not closed, decommissioned or divestment any of its facility till date but is aware about the requirement to review Environmental, Social and Governance issues and intends to apply the same if required in the future.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has been publishing its annual Sustainability Report for last 3 years following the GRI standards. https://www.albasmelter.com/mc/newsletters/pdf/albasustainabilityreport2018.pdf https://www.albasmelter.com/mc/newsletters/pdf/albasustainabilityreport2017.pdf https://www.albasmelter.com/mc/newsletters/pdf/albasustainabilityreport2016.pdf
3.2 Non-compliance and liabilities	Conformance	Since 2016, the Entity publishes its Sustainability Report on an annual basis which contains information on fines, judgements, penalties and non-monitory sanctions as applicable. https://www.albasmelter.com/mc/newsletters/pdf

CRITERION	RATING	COMMENT
		/albasustainabilityreport2018.pdf https://www.albasmelter.com/mc/newsletters/pdf/albasustainabilityreport2017.pdf https://www.albasmelter.com/mc/newsletters/pdf/albasustainabilityreport2016.pdf .
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has made no payments to any government in the past other than legal or contractual basis. This Entity is also periodically audited by the National Audit Office to ensure that the organization meets its compliance obligations including payments to governments.
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	<p>The Entity has implemented an accessible, transparent, understandable and culturally and gender sensitive, External Grievance Mechanism (via Alba Integrity Line), adequate to address all relevant stakeholder complaints, grievances and requests for information relating to its operations.</p> <p>https://secure.ethicspoint.com/domain/media/en/gui/18847/index.html.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Minor Non-Conformance	The Entity has developed a framework for the Life Cycle Assessment (LCA) to address the environmental impacts associated with production of aluminium and have finalized the specialized organization to conduct the same but it is not completed yet.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has documented its communication process for responding to customer enquiries. The Entity has not received any request from its customer to share information from life cycle assessment.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	The Entity has neither made public communications nor received any request from the public about communicating LCA of its products.
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 has got a clearly established strategy for Aluminium Process Scrap management which includes Plans for managing risks/impacts

CRITERION	RATING	COMMENT
		associated with the generation of process scraps, collection, recycling/reuse and minimisation strategies. The entity recycles 100% of its generated aluminium process scrap.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has got a systematic process of color-coding hard alloy scrap thus separating Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Minor Non-Conformance	The Entity has existing waste collection strategy for collecting end of life waste through scrap dealer and intends to develop it by involving more stakeholders and same is planned to be part of LCA which is yet to be completed.
4.4b Collection and recycling of products at end-of-life (engagement)	Minor Non-Conformance	The Entity currently engages with scrap dealer and secondary producer to collect and recycle the end of life aluminium waste. The Entity measures the quantity of scrap recycled in the plant but they have not considered any targets and plans to increase the recycling rates. This is expected to be part of LCA study document which is ongoing.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity is reporting its GHG emissions and Energy use data in the annual Sustainability Report. However, the GHG emissions and energy use data by source is to be incorporated. Refer page 35 in sustainability report 2018. https://www.albasmelter.com/mc/newsletters/pdf/albasustainabilityreport2018.pdf .
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity has considered time bound CO2 reduction target supported by action plan which included decision to go for high capacity and high efficient turbine for the new Power Plant 5. However, targets for other GHG components are not yet established.
5.3a Aluminium Smelting (management system)	Conformance	The Entity has established its Environmental Management System in accordance with ISO 14001:2015 that includes adequate operational controls and evaluation procedures to limit direct GHG emissions. https://www.albasmelter.com/investments/Environment/Documents/ISO14001.pdf .
5.3b Aluminium Smelting (up to and including 2020)	Minor Non-Conformance	The Entity has CO2 reduction targets considered for year 2020 supported with action plans which includes to retire low efficient PS1 &

CRITERION	RATING	COMMENT
		PS2 turbines. The CEO has also given written commitment to further prepare GHG reduction plan before Q1 2020 to reach < 8 tonnes CO2 eq per metric tonne aluminium by 2030.
5.3c Aluminium Smelting (after 2020)	Not Applicable	Not applicable as of this audit in Nov 2019.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has established Air Emissions Monitoring plan within its ISO 14001 system in line with local regulations. Emissions to the air are under control and found to be within compliance limits and reported to Supreme Council of Environment on a monthly basis.
6.2 Discharges to Water	Conformance	The Entity withdraws seawater for cooling and to produce potable water for own use in power plants. Ground water is used in smelter which is only 15% of the total water consumed. Water consumed and discharged is reported in the annual Sustainability Report. Entity implements its monitoring plan for the discharge water and reports the result to the environmental authority on monthly basis meeting its legal obligations.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity as part of its ISO 14001:2015 implementation has assessed environmental aspects related to potential spills and leakages in all areas and determined the operational controls adequately in various Alba Code of Practices which are tested periodically to evaluate their effectiveness.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity as part of its ISO 14001 system has established emergency procedure ACOP 55 covering management and communication of spill incidents and have also determined external communication requirements including communication of spill incidents. Any major spill incident is also reported in the Sustainability Report.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity as part of its ISO 14001 system implementation has established procedure ACOP 065 which includes immediate reporting of any spill. Awareness level of employees regarding the same was found to be adequate

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6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publishes annual Sustainability Report wherein it reports spills if any and its adverse impacts and mitigation actions. There were no significant spill incidents in 2018 as per Sustainability Report 2018 page 37. https://www.albasmelter.com/mc/newsletters/pdf/albasustainabilityreport2018.pdf .
6.5a Waste management and reporting (strategy)	Conformance	The Entity has established a Waste Management Strategy WMSP/SHE DT 24.12.2018 which is focussed on minimising the generation of waste and safe disposal of waste over the next 5 years following the waste mitigation hierarchy. The strategy covers both hazardous and non-hazardous waste.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity discloses quantity of Hazardous and Non-Hazardous Waste generated including methods of disposal in their annual Sustainability Report, refer page 36 in 2018 sustainability report. https://www.albasmelter.com/mc/newsletters/pdf/albasustainabilityreport2018.pdf Significant deviations need to be suitably explained in the report.
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.
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)	Conformance	The Entity is currently storing SPL at SCE (local Environmental Regulator) managed facility under controlled conditions and controls are put in place to prevent the release of SPL or leachate to the environment. Besides, the Entity is in the process of establishing SPL treatment plant, which would be commissioned soon.

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6.7b Spent Pot Lining (SPL) (recovery and recycling)	Minor Non-Conformance	The Entity used to recover and recycle carbon and refractory materials from the SPL until 2017. Subsequently Entity decided to have state of the art SPL treatment plant due to which they started storing SPL in approved facility. The ESIA study confirms 100% conversion of SPL waste into Energy saving feedstock for the cement industry.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity currently stores the untreated SPL at the SCE (local Environmental Regulator) approved landfill facility with all required controls to prevent all the potential environmental impacts identified through ESIA. Besides, the Entity is also in the process of establishing SPL treatment plant, which would be commissioned soon.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity has approved SPL treatment project next to the Entity's complex thus demonstrating the process of reviewing alternative options to landfilling of SPL.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity does not dispose SPL waste to any marine environment.
6.8a Dross (recovery)	Conformance	The Entity with aim to maximise dross recovery has established a long term contract with TAHA International for Industrial Services (TAHA) to manage its dross waste. TAHA transports the depleted dross generated from Alba Dross Processing facilities to the factory in Maammer for crushing, sieving and manufacturing into value-added product which is used in various industries.
6.8b Dross (recycling)	Conformance	The Entity demonstrates its commitment and support to maximise the recycling of treated Dross residues through its recycling partner TAHA.
6.8c Dross (review of alternatives)	Not Applicable	The Entity does not landfill Dross residue hence the criteria does not apply. The Dross residue are converted to value added materials as input material to steel industry and the Entity is constantly reviewing other uses of Dross residue through its recycling partner TAHA.

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PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	<p>The Entity has mapped its water resources and same is also reflected in the Line 6 ESIA report and Sustainability Report. Sea water and ground water are the two source of water whereby ground water constitutes 15% of total water intake. Water consumption is monitored on daily basis and analysed on monthly basis. Water related risks and their controls have been identified in detail in the ESIA report for Line 6. The Entity has a net positive impact on water use in that more water is being generated than is required for operational purposes, with the surplus being supplied to the national water grid.</p>
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity has assessed water related risk in the ESIA and the Supplementary ESIA report for Line 6. The water-related risks are evaluated as low because the main water source is sea water which is converted into potable water through desalination plant which is used for cooling purpose and for boiler feed water. The water discharge to the sea is from the cooling tower blow down and from boiler blow down. The quality of the discharge water is within the limits specified by Supreme Council of Environment. Water use is assessed as low material risk in the Sustainability Report 2018 as the Entity has net positive impact on water use due to generating more quantity of potable water than operational requirements and sending surplus water to national water grid. The Area of Influence considered is Entity's own facility (Reduction lines, Calciner and Cast house), Associated facility (Carbon plant, Power plant etc.) and Project activity (Line 6 expansion project etc.) and cumulative impacts of these are evaluated.</p>
7.2a Water management (management plans)	Not Applicable	<p>The Entity has assessed water use and discharge as low material risk in the ESIA report and hence water management plan with time bound target is not applicable.</p>
7.2b Water management (monitoring)	Not Applicable	<p>The Entity has assessed water use and discharge as low material risk in the ESIA report and hence water management plan and its monitoring are not applicable.</p>

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7.3 Disclosure of water usage and risks	Conformance	The Entity reports and discloses its water withdrawal and use in its annual Sustainability Report (refer page 41, in 2018 sustainability report) covering calciner and smelter plants. Materiality Assessment covering water related risks are also included in the report. https://www.albasmelter.com/mc/newsletters/pdf/albasustainabilityreport2018.pdf .
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the biodiversity impact as part of ESIA study for the Line 6 & Calciner project. The Area of influence considered is Entity's Aluminium production facility (Reduction lines and Cast house), Associated facility (Carbon plant, Calciner plant, Power plant etc.) and Project activity (Line 6 Expansion Project, Calciner project etc.). Line 6 project included the Potline 6 site, PS5 site, Alba Marine Terminal and the Construction Laydown Area (CLA). No significant biodiversity impacts were identified in both the project ESIA reports.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The Entity has done ESIA assessment for Line 6 Expansion Project and for port up gradation project. Biodiversity is not identified as a material aspect in the ESIA report for both the projects. The Entity has included materiality assessment in the annual Sustainability Report and biodiversity is not identified as a material aspect. Biodiversity action plan is hence not needed.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The Entity has done ESIA assessment for Line 6 Expansion Project and for Port Upgradation Project. Biodiversity is not identified as a material aspect in the ESIA report for both the projects. The Entity has included materiality assessment in the annual Sustainability Report and biodiversity is not identified as a material aspect. Biodiversity action plan is hence not needed.
8.2c Biodiversity management (reporting)	Not Applicable	ESIA report for Line 6 & Port Upgradation Project is uploaded on entity's website which includes biodiversity assessment as well. Biodiversity impacts are not identified as significant for the Entity. Sustainability Report 2018 did not identify biodiversity as material risk and hence there is

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		no biodiversity action plan and hence no reporting on its outcome.
8.3 Alien Species	Minor Non-Conformance	The Entity implements the control related to preventing the discharge of ballast water into the sea while vessels are at anchorage to prevent introduction of any alien species, however they have not documented the due diligence identifying the introduction of alien species through other potential routes and to take suitable actions to mitigate the risk.
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)	Minor Non-Conformance	Though there are several HR policies which are protecting Human Rights violation; however the Entity does not include specific commitment statement to respect human rights in their HR policy document.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has conducted Supplementary ESIA study for Line 6 and Calciner project which included Social Impact Assessment on Human Rights to meet IFC performance standards.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has various means to report Human Rights violation cases such as grievance handling system, labour unions, Integrity Line etc. but no Human Rights violation case has been reported till date requiring remediation plan.
9.2 Women's Rights	Minor Non-Conformance	Though the Entity has established various HR policies and procedures which supports the respect of women rights but The Entity has not documented separate policy on respecting the

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		rights and interests of women, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW).
9.3 Indigenous Peoples	Not Applicable	The criterion is not applicable as there is no presence of Indigenous People or their lands, territories and resources.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	The element is not applicable as there is no presence of Indigenous People or their land, territory and resources.
9.5 Cultural and sacred heritage	Not Applicable	The Entity is based in a dedicated industrial area. The land for the new projects is allocated by the government. There is no data or information in ESIA that shows applicability of sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	The criterion is not applicable as the Entity is in the industrial area and the land for expansion is provided by the government. Hence, there is no resettlement needed.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity has not displaced any person due to its new project and hence the element of resettlement is not applicable. The Entity is based in an industrial area and the land for new project is allocated by the government.
9.7a Local Communities (rights and interests)	Conformance	The Entity has a process of conducting ESIA assessment and developing Community engagement plans for any new project to ensure that any adverse impact on the rights and interests of local communities are identified and mitigated.
9.7b Local Communities (impacts)	Conformance	The Entity has conducted the ESIA studies for various projects to determine and mitigate the impacts on local community during construction and operational phase. The mitigation actions as identified in ESIA report for Line 6 Expansion Project and Calciner project were well implemented to protect the rights and interests of local communities. Stakeholder engagement plans were developed and implemented for both these projects.
9.7c Local Communities (livelihoods)	Conformance	The Entity has developed and implemented stakeholder engagement plan for its new projects to engage with its stakeholders

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		including local communities. The plan has included the mitigation actions to address the adverse impacts on its stakeholders.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established Code of Conduct and Sponsorship donation and CSR policy which is well communicated and implemented to prevent 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 established detailed security procedure and provides trainings to its security staff upon joining and periodically on various topics including respecting human rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of workers to associate freely in line with Bahrain Labour Law and with the ILO Conventions C87 and C98. There are two Labour Unions formed in the Entity.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has two trade unions and workers are free to join any union. It has established Alba Committee policy 3-42 to engage with each of the union leaders on biweekly basis to discuss on common social issues.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity has two Labour Unions in the Alba plant as Bahrain Labour Law does not restrict the rights of workers to form unions; hence, this criterion is not applicable.
10.2a Child Labour (minimum age)	Conformance	The Entity has demonstrated effective controls to ensure the minimum age of workers working in the organization is greater than 18 years.
10.2b Child Labour (hazardous)	Conformance	The Entity has demonstrated effective controls to ensure the minimum age of workers working in the organization is greater than 18 years.
10.2c Child Labour (worst forms)	Conformance	The Entity has demonstrated effective controls to ensure the minimum age of workers working in the organization is greater than 18 years.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has well-defined Recruitment Policy, which ensures that it does not engage in or support human trafficking either directly or through recruitment agencies.

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10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has well-established Recruitment Policy, which ensures that any form of deposit, recruitment fee is not taken from its employees either directly or through recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has well-established Recruitment Policy which ensures that any form of deposit, recruitment fee is not taken from its employees including expatriates either directly or through recruitment agencies.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has well-defined Policy on Housing Loan and it does not hold workers in debt bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity and policies and practices, which allow freedom of movement of workers in the workplace or in on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain any original identity papers, work permits, travel documents or training certificates of its workers.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has well-defined policy which allows workers to terminate their employment contracts freely.
10.4 Non-Discrimination	Conformance	The Entity has various HR policies and controls in place to avoid discrimination practices in all forms of business conduct. The entity has dedicated Integrity Line for reporting any such case anonymously. No case of discrimination has been reported till date.
10.5 Communication and engagement	Conformance	The Entity has created a culture of open communication and direct engagement with workers and their representatives through various committees such as SHE Committee, Welfare Committee, Bi-weekly Committee, Executive Committee, Medical Rehab Committee. The roles of each Committee are established in detailed procedure.
10.6 Disciplinary practices	Conformance	The Entity has a transparent and published disciplinary procedure 02/08 in line with Bahrain Labour Law. Training is provided regarding this procedure to everyone upon joining and subsequently through Know Your HR campaigns. Disciplinary actions are

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		implemented in line with the procedure in an impartial manner.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of workers to a living wage and ensure that wages paid for a normal working week meets industry minimum standard and is sufficient to meet basic needs of workers with some discretionary income.
10.7b Remuneration (method of payment)	Conformance	The Entity pays wages on a monthly basis by crediting the same to the employee account and provides the wage slip for the same.
10.8 Working Time	Conformance	The Entity has documented and implemented policy 02/03 on working hours and overtime hours. The Entity regularly monitors the total working hours of each employee to ensure it is as per Bahrain labour law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has effectively documented, controlled, implemented and communicated the SHE Policy to all relevant stakeholders. The Policy is reviewed by the Entity at planned intervals to ensure the continuing suitability and effectiveness. The policy is endorsed by the Acting CEO. The resource requirements for the effective implementation of the Policy is systematically identified and provided.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has very well applied the SHE Policy and procedures to all workers including contractors and visitors present in any area or activities under the Entity's control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has established SHE policy which includes commitment to comply with all relevant local and international regulations related workers' health and safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has established SHE Policy which includes a statement that workers have the right to understand the hazards and safe practices for their work and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity maintains ISO 45001:2018 certifications which is subjected to periodic audits by an independent accredited certification body.

CRITERION	RATING	COMMENT
		https://www.albasmelter.com/investments/Pdf/OHSAS18001.pdf .
11.3 Employee engagement on health and safety	Conformance	The Entity provides workers with various mechanisms such as SHE Committee and Unions to raise, discuss and participate in the resolution of Occupational Health and Safety issues with management.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance at planned intervals using leading and lagging indicators and strive to continuously improve.

Document Control and Version History

Revision	Date	Notes
0	15 January 2020	Issued (Full Certification)