
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
BUSINESS
ASSURANCE
SERVICES
UK LTD.

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' or similar, written over a green background.

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

www.aluminium-stewardship.org

CERTIFICATION SCOPE

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

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 SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (3 – 7 November 2019)Surveillance Audit (28 – 30 June 2021)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">3 – 7 November 2019 (Initial Certification Audit)28 – 30 June 2021 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">20 November 2019 (Initial Certification Audit)7 October 2021 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (3 – 7 November 2019)</u></p> <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 SmeltingCasthouses <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (28 – 30 June 2021)</u></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.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouses

All relevant criteria in the ASI Performance Standard were included in the audit scope.

At the time of the audit (June 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

AUDIT
OUTCOME

- 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

Re-Certification Audit

NEXT AUDIT
DUE DATE

14 January 2023

CERTIFICATE
NUMBER

63

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented suitable systems to identify, understand, document, comply and report as needed on Applicable Laws to its business, by maintaining clear roles, responsibilities and awareness.
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. Alba Code of Conduct is available at: https://www.albasmelter.com/About%20Alba/Code-of-Conduct/pdf/Code%20of%20Conduct.pdf
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 business and supply chain. https://www.albasmelter.com/investments/Pdf/Safety%20Policy.pdf https://www.albasmelter.com/Corporate%20Responsibility/CSR/Pages/default.aspx https://www.albasmelter.com/Procurement/PDF/Social%20Management%20Policy%20-%20English.pdf
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.

CRITERION	RATING	COMMENT
		https://www.albasmelter.com/investments/Pdf/Safety%20Policy.pdf https://www.albasmelter.com/Corporate%20Responsibility/CSR/Pages/default.aspx https://www.albasmelter.com/Procurement/PDF/Social%20Management%20Policy%20-%20English.pdf
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 certification 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)	Conformance	The Entity has a documented social management system in the form of a social manual in line with international standard SA8000.
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity has implemented a Sustainable Procurement Policy and Social Management Policy for its supply chain that addresses environmental, social and governance issues. Refer to the following:</p> <p>https://www.albasmelter.com/Procurement/PDF/SustainableProcurementPolicy.pdf https://www.albasmelter.com/Procurement/PDF/Social%20Management%20Policy%20-%20English.pdf</p> <p>Supplier Due Diligence process is implemented but lacks effectiveness in reviewing supplier provided provision for an appropriate conclusion about the suppliers alignment with respect to sustainable procurement policy and social management policy.</p>
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

CRITERION	RATING	COMMENT
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 and government bodies.
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 publishes an annual Sustainability Report. The most recent report is for 2019 published in its website is available at: https://www.albasmelter.com/mc/Newsletters/pdf/AlbaSustainabilityReport2019.pdf Pages 11 and 12 outlines the Sustainability Management Approach and Sustainability Framework and Priority Areas. Page 15 provides the materiality analysis derived from stakeholder engagement identifying environmental, social and economic impacts. The Entity shall publicly disclose its governance approach and its material environmental, social and economic impacts.
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. The Annual Sustainability Report 2019 is available at: https://www.albasmelter.com/mc/Newsletters/pdf/AlbaSustainabilityReport2019.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has policies and controls in place to make, or have made on its behalf, payments to governments on a legal and/or contractual basis only. The Entity is periodically audited by the

CRITERION	RATING	COMMENT
		<p>National Audit Office to ensure that the organization meets its compliance obligations including payments to governments.</p> <p>https://www.albasmelter.com/IR/Publications/Documents/Annual%20Reports/AnnualReport2020.pdf</p> <p>Page 93 of the Annual Report provides details on significant government related transactions which are made contractually by selling its products or services.</p>
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 the 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)	Conformance	The Entity has developed a framework for the Life Cycle Assessment (LCA) to address the environmental impacts associated with production of aluminium. The LCA report is available for all its production lines and products.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has documented its communication process for responding to customer enquiries and needs. The Entity is providing adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium (containing) product(s) when requested.
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 associated with the generation of process

CRITERION	RATING	COMMENT
		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 an established system of color-coding hard alloy scrap and 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 considered time bound targets for receiving and recycling pre consumer scrap material, however the strategy for collection and recycling of products at end-of-life based on life cycle analysis (LCA) outcome is yet to be documented.
4.4b Collection and recycling of products at end-of-life (engagement)	Minor Non-Conformance	The Entity currently engages with a secondary producer to collect and recycle Aluminium waste. The Entity's board has approved three year sponsorship to the Royal Society for the Prevention of Accidents (RoSPA) Industry Sector – Waste Management and Recycling Award for promoting waste collection and recycling within the country. The Entity measures the quantity of scrap recycled in the plant but they have not considered any targets and plans to increase the recycling rate.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has established a consistent accounting system and publicly disclosure of its GHG Emissions and Energy use by source in its annual Sustainability Report. Refer page 21 in Sustainability Report 2019. https://www.albasmelter.com/mc/Newsletters/pdf/AlbaSustainabilityReport2019.pdf
5.2 GHG emissions reductions	Conformance	The Entity has long term and short term GHG reduction plans covering material sources of Direct and Indirect GHG Emissions, supported with reduction programs and efficiency improvement programs. The Entity has published time-bound GHG emissions reduction targets in annual sustainability report. Refer Page 21 in 2019 Annual Sustainability Report. https://www.albasmelter.com/mc/Newsletters/pdf/AlbaSustainabilityReport2019.pdf
5.3a Aluminium Smelting (management system)	Conformance	The Entity is implementing a certified ISO 14001 based Environmental Management System which has necessary processes effectively

CRITERION	RATING	COMMENT
		implemented for aspects evaluation about energy and emissions, and operational controls needed to maintain and limit Direct GHG emissions. Optimization and efficiency programs are undertaken for improvement.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has achieved < 8 tonnes CO2-eq per metric tonne Aluminium in 2020 with respect to Scope 1 and Scope 2 GHG emissions from the production of Aluminium. The operation philosophy and future plans confirm this is sustainable with possibility of further reductions.
5.3c Aluminium Smelting (after 2020)	Not Applicable	The Entity started production before 2020, hence this criterion is not applicable..
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has established an air emissions monitoring plan within its ISO 14001 management system in line with local regulations. Emissions to air are under control and found to be within compliance limits and reported to the regulator on a monthly basis. Air emission minimization programs are implemented.
6.2 Discharges to Water	Conformance	The Entity has implemented systems and controls to quantify and report Discharges to water. The Entity has recycling its sewage effluent, and minimizing discharges to sea water. Refer page 24 of 2019 annual sustainability report for water management disclosures. https://www.albasmelter.com/mc/Newsletters/pdf/AlbaSustainabilityReport2019.pdf
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has assessed environmental aspects, as part of its ISO 14001:2015 implementation, 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 within its Environment Management System, has established emergency procedures 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

CRITERION	RATING	COMMENT
		Report. Risk management and maintenance procedures are implemented to prevent and detect these Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity within its Environment Management System, has communication processes implemented for disclosing to affected parties with required detail including volume, type and potential impact of significant Spills immediately after an incident. Compliance and Corporate Social Responsible obligations related processes are implemented.
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 2019 as per Sustainability Report 2019 page 17. https://www.albasmelter.com/mc/Newsletters/pdf/AlbaSustainabilityReport2019.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity has established and implemented a waste management strategy which is focused on minimizing 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 publicly discloses quantity of Hazardous and Non-Hazardous Waste generated including methods of disposal in their annual Sustainability Report on page 27. https://www.albasmelter.com/mc/Newsletters/pdf/AlbaSustainabilityReport2019.pdf
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.

CRITERION	RATING	COMMENT
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. The Entity is commissioning a purpose built warehouse in its new SPL processing unit for storing and managing SPL.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Minor Non-Conformance	The Entity is commissioning a new SPL treatment plant for recovery and recycling of carbon and refractory materials, while the SPL is currently stored in controlled conditions.
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 discharge SPL to marine or aquatic environments.
6.8a Dross (recovery)	Conformance	The Entity aims to maximize dross and dross residue recovery and has established a long term contract with a third party dross processing company who is operating the dross processing facility next to cast house. Recovered metal is taken back into cast house while the depleted dross is taken by the contractor to process further manufacturing value-added product as feed to various industries.
6.8b Dross (recycling)	Conformance	The Entity through its dross processing contractor, processes dross residues further and convert to materials that are used as feed in other applications thus maximizing recycling of dross residue.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Not Applicable	The Entity does not landfill Dross residue hence the criterion 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.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water resources through impact assessments and in its Environment Management System. Withdrawal from different types and sources are accounted and reported internally and externally.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water related risk in the Environmental and Social Impact Assessment (ESIA) and the Supplementary ESIA report for the Line 6 Project. Area of Influence is considered in drawing and discharging seawater in desalination, considering seawater discharges and withdrawals by other organizations within the Entity's Area of Influence.
7.2a Water management (management plans)	Not Applicable	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.
7.2b Water management (monitoring)	Not Applicable	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.
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 24, in 2019 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/AlbaSustainabilityReport2019.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,

CRITERION	RATING	COMMENT
		Calcliner 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 undertaken an Environment and Social Impact Assessment (ESIA) for the 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 undertaken an Environment and Social Impact assessment (ESIA) for the 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	The Entity's Environment and Social Impact assessment (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 2019 did not identify biodiversity as material risk and hence there is 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.

CRITERION	RATING	COMMENT
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 has a documented Social Management Policy which provides commitment to respect human rights. The policy is communicated to all personnel and implemented through formal process of risk assessment.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has documented the process of conducting social risk assessment in the social management system manual. 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	Conformance	The Entity has established various HR policies and procedures referred in the social management system manual which provides the commitment to prevent discrimination against women including commitment to 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

CRITERION	RATING	COMMENT
		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 Environment and Social Impact Assessment (ESIA) 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 Environment and Social Impact Assessment (ESIA) 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 stakeholders in the area of influence. 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 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 a Code of Conduct and Sponsorship donation and Corporate Social Responsibility (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

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		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 established a social management system to prevent any kind of forced labour including engagement in or supporting human trafficking either directly or through recruitment agencies.
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.

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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 has policies and practices which allow freedom of movement of workers in the workplace. There is no 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 Human Resource (HR) policies and controls in place to avoid discrimination practices in all forms of business conduct. The Entity has a dedicated Integrity Line for reporting any such case anonymously. No case of discrimination has been reported until recently.
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 defined disciplinary action policy in accordance with Bahrain Labour Law. Training is provided regarding this policy to everyone upon joining and subsequently through Know Your Human Resource (HR) campaigns. Disciplinary actions are implemented in line with the procedure in an impartial manner.
10.7a Remuneration (living wage)	Conformance	The Entity has defined its Salary and Allowance policy which 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.

CRITERION	RATING	COMMENT
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 a documented and implemented policy 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 CEO. The resource requirements for the effective implementation of the Policy is systematically identified and provided. https://www.albasmelter.com/investments/Pdf/Safety%20Policy.pdf
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. The Entity maintains an accredited certification to ISO45001:2018. https://www.albasmelter.com/investments/Pdf/OHSAS18001.pdf
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. 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

CRITERION	RATING	COMMENT
		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)
1	31 October 2021	Surveillance Audit