
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**EMIRATES
GLOBAL
ALUMINIUM PJSC**

CERTIFICATE
NUMBER

27

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

9 MAY 2022

DATE OF EXPIRY

8 MAY 2025

CERTIFIED SINCE

9 MAY 2019

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

Emirates Global Aluminium PJSC, Al Taweelah site (UAE) including smelting and casting of aluminium, carbon plants, power generation, utilities, associated facilities and EGA head office.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Emirates Global Aluminium PJSC
ENTITY NAME	Emirates Global Aluminium PJSC - Al Taweelah
CERTIFICATION SCOPE	Emirates Global Aluminium PJSC, Al Taweelah site (UAE) including smelting and casting of aluminium, carbon plants, power generation, utilities, associated facilities and EGA head office.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouse
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (17 February – 8 April 2019)Surveillance Audit (11 October – 14 October 2020)Re-Certification Audit (30 March – 6 April 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">17 February – 8 April 2019 (Certification Audit)11 October – 14 October 2020 (Surveillance Audit)30 March – 6 April 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">22 April 2019 (Certification Audit)6 November 2020 (Surveillance Audit)21 April 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (17 February – 8 April 2019)</u></p> <p>The audit scope covered Emirates Global Aluminium PJSC, Al Taweelah site (UAE) including smelting and casting of aluminium, carbon plants, power generation, utilities, associated facilities and EGA head office.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouse <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

Surveillance Audit (11 October – 14 October 2020)

Emirates Global Aluminium PJSC, Al Taweelah site (UAE) surveillance audit after certification audit in 2019. This surveillance audit was undertaken after 18 months of Certification. Audit scope includes smelting and casting of aluminium, carbon plants, power generation, utilities, associated facilities and EGA head office. Emirates Global Aluminium's Al Taweelah site is located in Khalifa Industrial Zone Abu Dhabi (KIZAD).

At the time of the Audit (October 2020), 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.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouse

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

Re-Certification Audit (30 March – 6 April 2022)

The audit scope covered Emirates Global Aluminium PJSC, Al Taweelah site (UAE) including smelting and casting of aluminium, carbon plants, power generation, utilities, associated facilities and EGA head office.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouse

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

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

9 May 2022 – 8 May 2025

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DUE DATE

8 November 2023

CERTIFICATE
NUMBER

27

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a system to ensure legal compliance with Applicable Law through competent legal team and compliance champions across organizational functions. The required level of awareness is ensured through training catalogue.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Entity has established adequate anti-corruption measures through Anti-Bribery and Anti-Corruption Compliance Programme. These are publicly available in the Entity's website: https://www.ega.ae/media/1016/ega-code-of-conduct.pdf https://www.ega.ae/en/sustainability/integrity/
1.3 Code of Conduct	Conformance	The Entity has implemented a well-documented organizational Code of Conduct that includes relevant principles for environmental, social and governance performance. The Code of Conduct is a public document available in its website. This is also extended to supply chain through supplier declaration: https://www.ega.ae/media/1016/ega-code-of-conduct.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established a policy consistent with environmental, social, and governance practices included in ASI Performance Standard, making it public in its website: https://www.ega.ae/media/1721/ega0125-ega-core-policies-a4.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's CEO has endorsed the policy and made available to the public. All types of resources are planned and provided for. Implementation and effectiveness of the policy is reviewed across all levels of the Entity.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated its Core Policy well internally and externally: https://www.ega.ae/media/1721/ega0125-ega-core-policies-a4.pdf
2.2 Leadership	Conformance	The Entity has appointed the Sustainability Manager with having overall responsibility and authority for

CRITERION	RATING	COMMENT
		ensuring conformance with the requirements of ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity maintains accredited certification to its Environment Management System according to ISO 14001:2015 standard. https://www.ega.ae/en/about-us/our-policies-and-certifications
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented a well-documented standalone Social Management System.
2.4 Responsible Sourcing	Conformance	The Entity has taken up well designed programme for responsible sourcing as part of its purchasing process: https://www.ega.ae/en/suppliers/developing-a-sustainable-supply-chain/ The Entity has developed and implements a robust risk-based approach in supplier Due Diligence taking requirements and guidance from OECD and other related international practices.
2.5 Impact Assessments	Conformance	The Entity has a process to conduct environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities. There are no new projects or major changes in the Entity's facilities.
2.6 Emergency Response Plan	Conformance	The Entity has site specific Emergency Response Plans developed in collaboration with potentially affected stakeholders groups which are periodically tested through drills. Involvement of stakeholders such as Workers and relevant agencies were evidenced. The Entity has a competent and dedicated firefighting crew available onsite 24x7.
2.7 Mergers and Acquisitions	Conformance	The Entity has adequate procedures and resources for Mergers and Acquisitions (M&A) that address environmental, social and governance issues in the due diligence process.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity maintains adequate decommissioning procedure to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity prepares and publishes an annual sustainability report disclosing its governance approach and its material environmental, social and economic impacts in line with GRI standards with

CRITERION	RATING	COMMENT
		<p>independent assurance for key elements.</p> <p>The 2020 Annual Sustainability Report including previous disclosures from 2017 are available in Entity's website as a public document:</p> <p>https://www.ega.ae/en/sustainability/our-approach https://www.ega.ae/media/2617/ega-2020-sustainability-report.pdf</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There are no significant fines or penalties imposed on the Entity as reported in 2020 Annual Sustainability Report, page 98:</p> <p>https://www.ega.ae/media/2617/ega-2020-sustainability-report.pdf</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity has an adequate system to make, or have made on its behalf, payments to governments only on a legal and/or contractual basis. The Entity has zero tolerance to bribery in all business dealings and relationships. The Entity's policy prohibits bribery, including facilitation payments.</p>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has an adequate system that is publicly available to address stakeholder complaints, grievances and requests for information relating to its operations. The Entity operates certified Management Systems in accordance with ISO 14001:2015 and ISO 45001:2018. The Entity maintains required information in its website for ease of contact:</p> <p>https://www.ega.ae/en/contact-us</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has evaluated life cycle impacts of its major product lines producing primary Aluminium. A process to ensure the life cycle impact information is updated on regular basis is available.</p> <p>The Entity has launched "CelestiAL" solar aluminium as the first company in the world to produce aluminium commercially using solar power:</p> <p>https://www.ega.ae/en/products/celestial</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity provides adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium product(s) to customers upon request.</p>

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	The Entity has neither made public communication nor has it received any request for public communication about 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 sound process control and management reporting for scrap aimed for minimization including reuse/recycling with a target of 100%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates its alloys and grades with location and on-product identification for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has an aluminium recycling strategy including specific activities such as such recycling scrap from Aluminium processing industry scraps in exchange of primary metal, however collection and recycling of products at end-of-life is not an option within the context of the Entity.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is a member and sponsor in Emirates Environment Group (non-governmental organization), driving aluminium waste collection and recycling across the nation.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts and publicly discloses Scope 1 and Scope 2 Greenhouse Gas (GHG) emissions and energy use by source on an annual basis through its sustainability report available in its website. Refer pages 64 to 69 in the 2020 Annual Sustainability Report: https://www.ega.ae/media/2617/ega-2020-sustainability-report.pdf
5.2 GHG emissions reductions	Conformance	The Entity publishes time-bound GHG emissions reduction targets in its annual Sustainability Report, page 68: https://www.ega.ae/media/2617/ega-2020-sustainability-report.pdf The Entity has implemented a plan to achieve these targets covering the material sources of Direct and Indirect GHG Emissions by developing and implementing the Carbon Abatement Strategy 2019-2023. The Entity has launched its "CelestiAl" metal manufactured using solar power: https://www.ega.ae/en/products/celestial

CRITERION	RATING	COMMENT
5.3a Aluminium Smelting (management system)	Conformance	The Entity operates its Environmental Management System in accordance with ISO 14001:2015 that has adequate evaluation procedures and operating controls to limit Direct GHG emissions, as well as other emission types: https://www.ega.ae/en/about-us/our-policies-and-certifications
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity currently emits (Scope 1 and Scope 2 emissions) less than 8 tonnes CO ₂ -eq per metric tonne aluminium, independently verified and assured as part of its annual sustainability reporting process. Refer page 68 in the 2020 Annual Sustainability Report: https://www.ega.ae/media/2617/ega-2020-sustainability-report.pdf
5.3c Aluminium Smelting (after 2020)	Conformance	The Entity has an appropriate Impact Assessment process confirming the GHG emission Scope 1 and Scope 2 GHG emissions from expansions would be below 8 tonnes CO ₂ -eq per metric tonne Aluminium, when constructed.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has implemented an Air Emissions programme that quantify and report Emissions to Air that have adverse effects on humans or the environment, within its ISO 14001 system in line with local regulations and own standards. Emissions to Air are under control and found to be well within compliance limits. The Entity aims to minimize Air Emissions with evaluated action plans.
6.2 Discharges to Water	Conformance	The Entity quantifies and reports Discharges to Water. Seawater is used for cooling purposes and a part of it is desalinated to produce potable water for own consumption. The Entity operates the Operation Environmental and Social Management Plan (OESMP) to ensure the adverse effects are minimized and all regulatory requirements are complied with. Refer pages 70-71 in the 2020 Annual Sustainability Report: https://www.ega.ae/media/2617/ega-2020-sustainability-report.pdf
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity assesses the potential and major areas where spills or leaks may occur through risk assessment and registry.

CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity maintains an Environmental Management System that has adequate procedures for management and external communication plans, compliance controls and a monitoring programme to prevent and detect spills and leakage. Borewells for groundwater monitoring are available and tested periodically.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity's Environmental Management System has adequate procedures for reporting of spills internally and externally to stakeholders and regulators.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity's 2020 Annual Sustainability Report in page 75 includes public reporting of spills. The Entity did not have a significant spill in 2020. The Entity continued the remediation of a spill from 2015 and 2016 and successfully completed with the approval of the regulator. Refer page 75 of the 2020 Annual Sustainability Report: https://www.ega.ae/media/2617/ega-2020-sustainability-report.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management control plan as part of the Operation Environment and Social Management Plan (OESMP) which has been developed based on the Waste Mitigation Hierarchy covering reduce, reuse, recycle, recover and responsibly dispose.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publishes an annual sustainability report as a public document that contains data on the quantity of hazardous and non-hazardous waste generated as well as associated waste disposal methods. Refer pages 73 – 74 in the 2020 Annual Sustainability Report: https://www.ega.ae/media/2617/ega-2020-sustainability-report.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.

CRITERION	RATING	COMMENT
6.6e Bauxite Residue (state 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 has a purpose built storage shed onsite for SPL constructed in accordance with the risks and controls assessed through an environmental impact study. Due to low movement to recycling in the recent period, an additional temporary storage location is in use with necessary precautions to prevent the release of SPL or leachate to the environment.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity sends SPL to approved pre-treatment facilities where SPL is treated for safe disposal and co-processed in cement industry as feedstock maintaining thermal certificates for co-processed SPL quantities.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity does not landfill SPL, it is all treated and recycled in the cement industry.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable since the Entity does not landfill or stockpile SPL.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity's policy, procedure and infrastructure is ensuring no possibility of discharge to marine or aquatic environment.
6.8a Dross (recovery)	Conformance	The Entity maximizes the recovery of aluminium by sending all generated Dross to third-party specialized facilities who process and recover metal from dross. The Entity maintains a dashboard for data regarding metal recovery from dross.
6.8b Dross (recycling)	Conformance	The Entity is treating Dross residues at the contractor's premises which is recovering metal from dross. The treated non-hazardous dross residue is recycled in wide applications.
6.8c Dross (review of alternatives)	Conformance	The Entity does not landfill Dross residue. The Entity is reviewing and implementing the options to recycle dross residue after treatment.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has water balance charts that identify and map its water withdrawal and use by source and type. The Entity draws only seawater.
7.1b Water assessment (risk assessment)	Conformance	Water related risks are addressed as part of the Environmental and Social Impact and Environmental

CRITERION	RATING	COMMENT
		Management System for the Entity's facility. Though associated risks are evaluated as "low", mitigation actions were suitably implemented.
7.2a Water management (management plans)	Not Applicable	The Entity is located within an arid, desert environment with no sources of freshwater and hence this is not identified as a material item as per sustainability risk assessments. Therefore this element is not applicable. However, there are water related monitoring programs implemented within the Entity's Environmental Management System.
7.2b Water management (monitoring)	Conformance	Although water is not identified as material as per the risk assessments, there are water management plans implemented within the ISO 14001:2015 Management System.
7.3 Disclosure of water usage and risks	Conformance	The Entity publicly discloses its water withdrawal, use and risks in its 2020 Annual Sustainability Report, page 70, though it is not material: https://www.ega.ae/media/2617/ega-2020-sustainability-report.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence through Environment and Social Impact Assessment (ESIA). Public commitment for biodiversity is available at: https://www.ega.ae/en/our-sustainability/environment
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has prepared a Biodiversity Action Plan (BAP) to protect and conserve the biodiversity of the area. The BAP includes time-bound actions which are monitored and tracked.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Biodiversity action planning is performed with participation of identified stakeholders as a consultative mechanism and designed in accordance with the Biodiversity Mitigation Hierarchy (Avoid, Reduce, Remedy and Offset).
8.2c Biodiversity management (reporting)	Conformance	The Entity has disclosed the biodiversity outcomes in page 76 of the 2020 Annual Sustainability Report: https://www.ega.ae/media/2617/ega-2020-sustainability-report.pdf The Biodiversity Action Plan implementation for conservation efforts for the critically endangered Hawksbill turtle was shared with and published by ASI as the first in the ASI Story of Change Series:

CRITERION	RATING	COMMENT
		https://aluminium-stewardship.org/why-aluminium/asi-outcomes-impacts/asi-story-of-change-series
8.3 Alien Species	Conformance	Potential introduction of Alien Species is identified (shipping vessels) and managed through ship owners and port authority controls as per national maritime laws.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity’s core policy includes commitment to respect Human Rights which is deployed through its Social Management System.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity’s Due Diligence process incorporates a risk-based approach that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights, focusing efforts where the risk of adverse Human Rights impact is most significant.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has not identified to have caused or contributed to adverse Human Rights impacts but has the process to cover this in line with its core policy and code of conduct.
9.2 Women’s Rights	Conformance	The Entity implements policies and processes to ensure women’s rights are respected based on risk assessments and controls in its Social Management System consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW).
9.3 Indigenous Peoples	Not Applicable	The Entity is in a specially created industrial zone where there was no habitation in the past, hence there are no known Indigenous Peoples living near the Entity.

CRITERION	RATING	COMMENT
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous Peoples in this region and hence FPIC is not applicable.
9.5 Cultural and sacred heritage	Not Applicable	There are no sacred or cultural heritage sites and values within the Entity's Area of Influence, and no communities in the vicinity of the Entity. Hence, this Criterion is not applicable.
9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity is in a specially created industrial zone where there were no people living.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity is in a specially created industrial zone where there were no people living.
9.7a Local Communities (rights and interests)	Conformance	There are no Local Communities near the Entity since it is in a dedicated industrial zone. However, the Entity has established a community stakeholder engagement / consultation programme.
9.7b Local Communities (impacts)	Conformance	There are no known or potential adverse impacts on Local Communities. The Entity holds regular meetings with the Local Community via a community "Majlis" to get the voice of community. There were no reported community complaints in the last year.
9.7c Local Communities (livelihoods)	Conformance	The Entity has developed and implemented a Corporate Social Responsibility (CSR) strategy and projects. There are no identified issues affecting Local Communities from the Entity's Human Rights Due Diligence outcome.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has an adequate policy and controls for not contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRA) either directly or through supply chain. Enhanced Due Diligence on supply chain includes CAHRA assessment based on defined criteria.
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity has engaged a private security service provider and ensures that security practices including the Voluntary Principles on Security and Human Rights, are adhered to.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Not Applicable	UAE law has a mechanism of grievance reporting relating to employee relations with an employer. However, UAE law restricts rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils. Hence, this criterion is not applicable.

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Not Applicable	UAE law has a mechanism of grievance reporting relating to employee relations with an employer. However, UAE law restricts rights of Workers to Collective Bargaining and hence such agreements do not exist.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	While the Applicable Law restricts the rights to Freedom of Association and Collective Bargaining, the Entity implements mechanisms such as Employee Care Centre, Residential Area 'Mosque Tent Meetings', Suggestion schemes / Tamayaz program as alternate means where employees interact with various levels of management about working and living conditions. The Entity has implemented an employee survey named as "Mashura Survey" and the results of the survey are reviewed and addressed by senior management to influence positive change within the organization.
10.2a Child Labour (minimum age)	Conformance	The Entity's policies and employment rules are in place to prevent hire of Child Labour. The Entity ensures that this policy is applied through the supply chain by supplier declarations and risk based Supply Chain Due Diligence.
10.2b Child Labour (hazardous)	Conformance	The Entity, through its policies and employment rules, neither engages nor supports Hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Entity's policies and employment rules neither engage nor support Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has adequate policy and controls for preventing Human Trafficking either directly or through recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has processes to ensure that it does not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has processes implemented to ensure that it does not require Migrant Workers to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has policies and controls to ensure Workers are not in debt bondage or force them to work in order to pay off a debt. This applies to the Entity's suppliers as well.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has processes and resources for free movement of Workers either in the workplace or in on-site housing.

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has policy and procedures that do not allow retention of Workers' original documents.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's employment conditions for termination of employment are in line with national labour laws, giving provisions for both parties to terminate with a defined notice period.
10.4 Non-Discrimination	Conformance	The Entity has policies and controls in place to ensure equal opportunities and not engage in or support Discrimination in any aspect as defined in the core policy and code of conduct.
10.5 Communication and engagement	Conformance	The Entity has implemented an open communication process and is regularly reviewing all communications. The Entity has a reporting mechanism for any intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity has transparent and published disciplinary processes in line with national labour laws. Disciplinary actions are implemented in an impartial manner through the employee relation process.
10.7a Remuneration (living wage)	Conformance	The Entity conducts a periodic compensation survey and ensures competitiveness in pay and compensation and intends to be an industry benchmark. The Entity provides discretionary income through special allowances which are more than sufficient to meet the basic needs of Workers.
10.7b Remuneration (method of payment)	Conformance	The Entity makes salary payments (including due overtime payments) before the end of each month through the Entity's payroll system. There are no instances of delay in salary payments from the establishment date of the Entity.
10.8 Working Time	Conformance	The Entity has published an employee handbook describing working hours, Overtime, week off, public holidays, annual leave, etc. in compliance with local law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety and is endorsed by Chief Executive Officer: https://www.ega.ae/en/about-us/our-policies-and-certifications/

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety and it is applied to all Workers and Visitors: https://www.ega.ae/en/about-us/our-policies-and-certifications/
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety and a commitment to comply to all Applicable Laws on health and safety and international standards: https://www.ega.ae/en/about-us/our-policies-and-certifications/
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety, and a statement that everyone at EGA understands the hazards and safe practices for their work and has the authority to refuse or stop any unsafe activities: https://www.ega.ae/en/about-us/our-policies-and-certifications/
11.2 OH&S Management System	Conformance	The Entity maintains an Occupational Health and Safety (OH&S) Management System and is ISO 45001:2018 certified: https://www.ega.ae/en/about-us/our-policies-and-certifications/
11.3 Employee engagement on health and safety	Conformance	The Entity maintains certification to ISO 45001:2018. Employee engagement is achieved through risk assessments, Mashura survey, safety committees, departmental meetings, 'EHS App' for reporting unsafe act, unsafe conditions, violations to Entity workplace safety rules, etc.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance using leading and lagging indicators, compares this with peers and best practices where available, and strives to continuously improve. The Entity participates in knowledge sharing meetings among industry peers at a regional and global level.

Document Control and Version History

Revision	Date	Notes
0	9 May 2019	Initial Certification Audit
1	18 December 2019	Links to Sustainability Reports updated
2	20 November 2020	Surveillance Audit
3	9 May 2022	Re-Certification Audit