

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Aluminium Bahrain B.S.C. (Alba)

CERTIFICATE  
NUMBER

63

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

DATE OF ISSUE

31 AUGUST 2023

CERTIFICATION LEVEL

FULL  
CERTIFICATION

DATE OF EXPIRY

30 AUGUST 2026

ASI ACCREDITED  
AUDITING FIRM

CETIZION VERIFICA

CERTIFIED SINCE

15 JANUARY 2020

## AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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](http://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 at  
the Alba Calciner and Alba Smelter  
in Bahrain.

# 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 at the Alba Calciner and Alba Smelter in Bahrain.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (3 – 7 November 2019)</li><li>Surveillance Audit (28 – 30 June 2021)</li><li>Re-Certification Audit and Scope Change (23 – 27 October 2022)</li><li>Surveillance Audit (7 – 9 August 2023)</li></ul>
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none"><li>3 – 7 November 2019 (Initial Certification Audit)</li><li>28 – 30 June 2021 (Surveillance Audit)</li><li>23 – 27 October 2022 (Re-Certification Audit and Scope Change)</li><li>7 – 9 August 2023 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>20 November 2019 (Initial Certification Audit)</li><li>7 October 2021 (Surveillance Audit)</li><li>14 March 2023 (Re-Certification Audit and Scope Change)</li><li>17 August 2023 (Surveillance Audit)</li></ul>
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"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (28 – 30 June 2021)</u></p>

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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 applicable 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.

#### Re-Certification Audit and Scope Change (23 – 27 October 2022)

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 applicable criteria in the ASI Performance Standard were included in the audit scope.

#### Surveillance Audit (7 – 9 August 2023)

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 applicable criteria in the ASI Performance Standard were included in the audit scope.

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AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> 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.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	31 August 2023 – 30 August 2026

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NEXT AUDIT TYPE                      Surveillance Audit

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NEXT AUDIT DATE                      28 February 2025

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CERTIFICATE NUMBER                      63

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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

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## ENTITY OVERVIEW

Aluminium Bahrain (Alba) is one of the largest smelters in the world and currently produces over 1.56 million tonnes per annum. It has been in operation for over 50 years and is one of the most significant facilities in the Kingdom of Bahrain. Alba produces high-quality aluminium products in the form of Standard and Value-Added Products (VAP), which are exported to more than 240 global customers. As the first Aluminium smelter in the Middle East, Alba has been a major contributor to the social, industrial and economic development of the Kingdom of Bahrain. Alba consists of six potlines, four power stations providing a total capacity of over 2.2 Gigawatts (GW), three carbon plants, two casthouses, a desalination plant, a calciner plant and a marine terminal with jetty facility. It occupies over 1.2 square kilometres of land in the Askar Industrial Area, approximately 15 kilometres south of Manama. As one of the biggest national companies, Alba employs nearly 3,500 people, with nearly 85 percent of employees being Bahrain nationals.

Alba is currently progressing on important projects such as a new Solar Farm, of 6 MW which will enable Alba to diversify our energy generation and the Block 4 Project towards response to clean energy -- which once operational will add 680 MW capacity to Power Station 5 Complex increasing its capacity to more than 2,480 MW.

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	Medium	Medium	Medium	Medium
<b>RISKS</b>	Medium	Medium	Low	Medium
<b>PERFORMANCE</b>	Medium	Medium	Low	Medium
<b>OVERALL</b>	<b>MEDIUM</b>			

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## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has appropriate systems in place to maintain awareness, ensure Compliance with Applicable Laws and maintain a context-sensitive commitment to customary and/or traditional practices. This is evidenced by the Entity's legal register, Code of Conduct, and relevant policies.
1.2 Anti-Corruption	Conformance	The Entity demonstrates a commitment to working against Corruption in all its forms, including Extortion and Bribery. Furthermore, it has ensured that Anti-Corruption is tackled in ways consistent with Applicable Law and prevailing/relevant international standards as is shown in their Code of Conduct and reinforced by existing state audit law.
1.3a-e Code of Conduct	Conformance	The Entity has updated its Code of Conduct in 2023, which has been approved by the Entity's Board: <a href="https://www.albassembler.com/uploads/CodeofConductEN_1.pdf">https://www.albassembler.com/uploads/CodeofConductEN_1.pdf</a> Training on these changes has been provided to employees.
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	All of the Entity's relevant Environmental, Social and Governance (ESG) Policies and procedures remain sensitive to the need to incorporate senior management as a part of the implementation and review process. The Entity has successfully monitored and ensured that this is the case.  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.  The Entity has effectively communicated the Environmental, Social and Governance Policy to its Stakeholders.
2.2a-c 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 the 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.
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.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity has been advancing to re-evaluate its Responsible Sourcing Policy and Supplier Due Diligence practices in alignment with national and international requirements, and to meet Stakeholders expectations such as London Metal Exchange Responsible Sourcing, OECD, EU Due Diligence law and the ASI Performance Standard. The Entity is also engaging subject matter experts to further strengthen its

CRITERION	RATING	COMMENT
		Responsible Sourcing Policies and monitoring mechanisms on par with global best practices and Stakeholder expectations. The Audit has confirmed that the Entity has developed a detailed plan to complete corrective action against an earlier non-conformity. Progress has been made on supplier audits addressing ESG criteria of EPC contractors engaged in expansion projects and operation activity (e.g., labour contractors). Additionally, periodic lenders audit against IFC principles on ESG requirements. The Entity shall demonstrate full compliance towards responsible sourcing and supply chain Due Diligence covering all suppliers of goods and services following risk based approach.
2.5a-g Environmental and Social Impact Assessments	Conformance	Where appropriate, the Entity has shown a commitment to conducting relevant Impact Assessments in order to establish an understanding of respective Baseline Conditions, prospective impacts as a result of its activities and associated mitigation efforts required. Moreover, the Entity has shown evidence that these Impact Assessments are periodically reviewed and updated. Recent examples include the Environmental and Social Impact Assessments (ESIA) for the Spent Pot Lining Project and Power Station 5 expansion.
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has implemented a Social Management Policy for employees and Contractors that addresses human resources diversity and Human Rights management issues. Refer to the following:  <a href="https://www.albasmelter.com/uploads/x4ltjwil_gfs.pdf">https://www.albasmelter.com/uploads/x4ltjwil_gfs.pdf</a>  <a href="https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf">https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf</a>  Additionally, the Entity has adopted Equator Principle 4 which mandates the development of a dedicated Human Rights Impact Assessment for New Projects: <a href="https://www.albasmelter.com/uploads/ESIA_Report_of_PS5_Block_4_Expansion_Project.pdf">https://www.albasmelter.com/uploads/ESIA_Report_of_PS5_Block_4_Expansion_Project.pdf</a>  A Due Diligence audit was undertaken by the Independent Environment and Social Consultant for the New Project.
2.7a-f Emergency Response Plan	Conformance	A well-designed and site specific Emergency Response Plan has been established by the Entity. The Plan has been developed in collaboration with Workers, Contractors and other relevant Stakeholders. Importantly, the Entity has also put a review process in place to account for both temporal and operational changes. The integrity of these plans and procedures is evidenced by ISO 45001, ISO 14001, and other relevant certifications.  The Entity's Business Continuity Management (BCM) Policy is publicly accessible at:  <a href="https://www.albasmelter.com/uploads/Business_Continuity_Management_Policy.pdf">https://www.albasmelter.com/uploads/Business_Continuity_Management_Policy.pdf</a>  The Entity's Sustainability Report 2021 includes an emergency preparedness and response, page 52:  <a href="https://www.albasmelter.com/en/category/publications">https://www.albasmelter.com/en/category/publications</a>
2.8a-d Suspended Operations	Conformance	The Entity has established a Business Continuity Management Strategy as well as an Enterprise Risk Management Framework to

CRITERION	RATING	COMMENT
		effectively navigate instances of operational closure, decommissioning or divestment.
2.9a-b Mergers and Acquisitions	Conformance	The Entity is aware of, and has committed to implementing a review of Environmental, Social and Governance issues in the Due Diligence process for mergers and acquisitions (whenever required) using references from the International Financial Corporation (IFC) Performance Standard and the UN Guiding Principles on Business and Human Rights.
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has established a Business Continuity Management Strategy as well as an Enterprise Risk Management Framework to effectively navigate instances of operational closure, decommissioning or divestment.</p> <p>The Entity has not closed, decommissioned or divested any of its Facilities, but is aware of the requirement to review Environmental, Social and Governance issues and intends to apply the same if required in the future.</p>
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has published their Sustainability Report 2021 since the previous Audit</p> <p><a href="https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf">https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf</a></p> <p>and other public disclosures having relevant ESG performance such as Annual report 2022</p> <p><a href="https://www.albasmelter.com/uploads/Alba_Annual_Report_2022.pdf">https://www.albasmelter.com/uploads/Alba_Annual_Report_2022.pdf</a></p> <p>as well as the limited external assurance of select KPIs of Sustainability report</p> <p><a href="https://www.albasmelter.com/uploads/Alba_3KPIs_Sustainability_Assurance_2022.pdf">https://www.albasmelter.com/uploads/Alba_3KPIs_Sustainability_Assurance_2022.pdf</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>Related disclosures relating to non-significant fines and penalties are provided below.</p> <p>1. Regulatory filings for 2023</p> <p><a href="https://www.albasmelter.com/en/category/regulatory-filings">https://www.albasmelter.com/en/category/regulatory-filings</a></p> <p>2. Corporate Governance Report 2021</p> <p><a href="https://www.albasmelter.com/uploads/Alba_Corporate_Governance_Report_2022.pdf">https://www.albasmelter.com/uploads/Alba_Corporate_Governance_Report_2022.pdf</a></p> <p>3. Sustainability Report 2021, page 26</p> <p><a href="https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf">https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf</a></p> <p>The Entity had reported three incidents of non-compliance relating to the exceedance in SO<sub>2</sub> in Anode Baking Kilns treatment units. These exceedances related to a change in the Green Petroleum Coke (GPC) which had a higher release of SO<sub>2</sub> than the previous material used. Corrective actions are in place.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has implemented Policies and controls 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 National Audit Office to ensure that they meet its compliance obligations including payments to governments.</p> <p><a href="https://www.albasmelter.com/en/category/annual-report">https://www.albasmelter.com/en/category/annual-report</a></p>

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented an accessible, transparent, understandable and culturally and gender sensitive, external Grievance Resolution Mechanism (via the Alba Integrity Line), which is adequate to address all relevant Stakeholder complaints, grievances and requests for information relating to its operations.</p> <p>Integrity Line – Page 9 of Code of Conduct:  <a href="https://www.albasmelter.com/en/category/code-of-conduct">https://www.albasmelter.com/en/category/code-of-conduct</a> and</p> <p>Contact Us and Direct Contact channels:  <a href="https://www.albasmelter.com/en/category/contact">https://www.albasmelter.com/en/category/contact</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed a framework for the Life Cycle Assessment (LCA) to address the environmental impacts associated with the production of Aluminium. The LCA report is available for all its production lines and Products.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has documented its communication process for responding to customer enquiries and needs. The Entity is providing adequate cradle-to-gate LCA information on its Aluminium (containing) product(s) when requested.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	As outlined in the Entity's Sustainability Report 2021, there is clear evidence that the Entity has taken well-thought steps to minimise process scrap across operations: <a href="https://www.albasmelter.com/en/category/publications">https://www.albasmelter.com/en/category/publications</a>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity's Sustainability Strategy and Roadmap includes engaging with Aluminium re-melters and selling of Products that contain Recycled Aluminium scrap content. The strategy also aims to work with local, regional, or national collection and recycling systems to increase recycling rates in respective markets for Alba's products. The Entity is also working on a dedicated pathway to reduce Greenhouse Gases (GHG) emissions from scrap remelting initiatives. The Entity is working towards increasing the collection of products at End of Life, networking with recycling facility. <a href="https://www.albasmelter.com/en/category/esg-roadmap">https://www.albasmelter.com/en/category/esg-roadmap</a>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	Public disclosure of GHG emissions (Scope 1 and 2) are included in the Sustainability Report pages 29-31, <a href="https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf">https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf</a> The GHG intensity (Scope 1 and 2) is reported as 7.921 tonnes CO <sub>2</sub> e/tonne of Primary Aluminium, demonstrates a 0.5% reduction over



CRITERION	RATING	COMMENT
		the previous year. However, for 2022, the GHG intensity calculated (Scope 1 and 2) is yet to be published.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity as it commenced operation in 1971.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	The GHG intensity (Scope 1 and 2) reported as 7.921 tonnes CO <sub>2</sub> e/tonne of Primary Aluminium, demonstrates a 0.5% reduction over the previous year. The Entity has developed an ESG road map including de-carbonisation, and the Circular Economy supported by a strategic initiative of a net zero target by 2060 and by year 2030 covering Scope 1, 2 and 3 below or equal to ASI Performance Standard requirements of 11 tonne CO <sub>2</sub> e/tonne of Primary Aluminium. <a href="https://www.albasmelter.com/en/category/esg-roadmap">https://www.albasmelter.com/en/category/esg-roadmap</a>
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity has developed an ESG road map including de-carbonisation, and the Circular Economy supported by a strategic initiative of a net zero target by 2060 and by 2030 covering Scope 1, 2 and 3 below or equal to ASI performance Standard requirements of 11 tonne CO <sub>2</sub> e/tonne of Primary Aluminium: <a href="https://www.albasmelter.com/en/category/esg-roadmap">https://www.albasmelter.com/en/category/esg-roadmap</a>  The recent international tender issued by the Entity for purchase of 500 MW renewable energy. <a href="https://www.albasmelter.com/uploads/Tender_Notice_for_Supplying_Clean_Renewable_Energy_English.pdf">https://www.albasmelter.com/uploads/Tender_Notice_for_Supplying_Clean_Renewable_Energy_English.pdf</a>
5.4 GHG Emissions Management	Conformance	A GHG management framework has been recently developed with an external agency and is currently under implementation including working on various strategic initiatives, an energy management system, and the digitalisation of GHG data analysts.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	Obligated to set stringent air emission limits to adhere to the International Finance Corporation (IFC) Environmental Performance Standards as per the Entity's SHE Management System, the Entity publicly discloses Material Emissions to Air from its activities and, where possible, from those within its Area of Influence on an annual basis. Implementation plans to minimise exposure to, and impacts from, Emissions to Air are set, periodically reviewed, and publicly disclosed. These are also well covered in the Entity's procedures on Assessment and Management of Environmental and Social Risks and Impacts, and Resources Efficiency and Pollution Prevention. Refer to the Sustainability Report 2021, page 34: <a href="https://www.albasmelter.com/en/category/publications">https://www.albasmelter.com/en/category/publications</a>
6.2a-g Discharges to Water	Conformance	The Entity has a comprehensive system in place for quantifying and reporting Discharges to Water. Wastewater treatment and disposal management is integrated into the Entity's Management System to comply with legal standards for wastewater discharge.

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established procedures to appropriately manage its Spills and Leakages. It has an understanding of its major risk areas and has ensured that all external communications plans, Stakeholder guidelines, compliance controls and monitoring programmes work in tandem to detect and mitigate Spills and/or Leakages.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has taken the appropriate measures to ensure that Spills are effectively reported and that an effective incident response plan is ready to be mobilised. The Sustainability Report is also used to communicate and publicly disclose any Spills and the remediation actions taken, if and when they occur.
6.5a-c Waste Management and Reporting	Conformance	As a part of its circularity strategy, the Entity has considered how best to implement a waste management strategy that integrates principles from the Waste Management Hierarchy. This is reflected in the Entity's Waste Management Strategic Plan. Furthermore, as a part of this Plan, the Entity has taken the appropriate steps to quantify the amount of both Hazardous and Non-Hazardous Waste generated across operations. The Sustainability Report 2021 discloses these figures and ensures that they are readily available to the public: <a href="https://www.albasmelter.com/en/category/publications#videogallery-3">https://www.albasmelter.com/en/category/publications#videogallery-3</a>  Public disclosures are made through Sustainability Report, pages 38-43: <a href="https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf">https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf</a>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	The Spent Pot Lining (SPL) treatment plant is effectively working at full capacity. There is temporary storage of SPL within the Entity's premises with necessary precaution to prevent land contamination and employees' safety handling SPL. The SPL (100%) transfer in a truck from temporary storage to SPL plant. The final product (non-hazardous) is used for cement and other industry. The public disclosure is available in the Sustainability Report, page 38: <a href="https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf">https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf</a>
6.8a-d Dross	Conformance	The Entity has managed Dross and abated leachate to the environment. With the use of its Waste Management Strategic Plan and partnership with its contractor TAHA, the Entity is maximising the recycling of treated Dross and demonstrates a regular commitment to finding alternative options through which to manage Dross waste and divert it from landfill. The Entity is continuing to explore alternatives to increase material recovery. The year 2021 figures were publicly disclosed at: <a href="https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf">https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf</a>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Minor Non-Conformance	The water management and consumption related information are disclosed in the Sustainability Report, page 36: <a href="https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf">https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf</a> Water intake, consumption and discharge quantities are recorded monthly. There is no satisfactory evidence of water risk assessment of impacts arising from water use as it relates to the source Watershed

CRITERION	RATING	COMMENT
		reviewed at least annually, the last groundwater monitoring plan was developed in July 2018 using an external agency.
7.2a-e Water Management	Conformance	The Entity has an ecosystem of water-related management plans and procedures, both Code of Practices and Standard Operating Procedures that work in conjunction with the interests of impacted Stakeholders to mitigate Material risks, relating to water identified by the Entity. As a result, the Entity has established a systematic review process through which to effectively manage water consumption and discharge.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has undertaken a systematic review process to identify (with priority) pertinent biodiversity-related risks that are evidenced by the Alba Biodiversity Action Assessment and Plan activities. For more information see the Sustainability Report 2021, pages 44 and 45:</p> <p><a href="https://www.albasmelter.com/en/category/publications#videogallery-3">https://www.albasmelter.com/en/category/publications#videogallery-3</a></p> <p>Whilst the Entity has assessed that its operations have no significant and Material risks on Biodiversity features and land-use related activities across the Entity's Area of Influence, it has decided to develop and implement a Biodiversity Action Plan. It has also identified that seawater withdrawal (for cooling purposes) may constitute a Priority Ecosystem Services and has implemented practices to manage this effectively.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	Whilst the Entity has assessed that its operations have no significant and Material risks on Biodiversity features and land-use related activities across the Entity's Area of Influence, it has decided to develop and implement a Biodiversity Action Plan. It has also identified that seawater withdrawal (for cooling purposes) may constitute a priority ecosystem service and has implemented practices to manage this effectively.
8.2a-g Biodiversity Management	Conformance	The Entity has ensured that the work undertaken to assess its biodiversity impacts has also been partnered with a set of appropriate management plans. This is in line with principles found in the Biodiversity Mitigation Hierarchy and has been further reinforced by consultations with external Stakeholders.
8.3a-c Management of Priority Ecosystem Services	Conformance	The Entity has ensured that provisions are undertaken to manage any Priority Ecosystem Services, in this case, seawater withdrawal. It has taken the time to appropriately identify these services and manage its activities' impacts. These plans are in line with principles found in the Biodiversity Mitigation Hierarchy and have been further reinforced by consultations with external Stakeholders.
8.4 Alien Species	Conformance	The Entity has proactively acted to prevent the accidental or deliberate introduction of Alien Species that could have Material adverse impacts on Biodiversity and Ecosystem Services.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity as its Facilities are located in a well-established dedicated industrial area/zone that is allocated by the Government of Bahrain.

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity as there are no terrestrial or marine Protected Areas within the Entity's Area of Influence.
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity understands its social and civic responsibility to the public and ensures it operates in a way that fulfils its responsibilities to their employees, host communities, and other Stakeholders. Committing to their Social Management Policy and General Human Resources Policy and guided by their Social Management System Manual, the Entity ensures to observe the UN Guiding Principles on Business and Human Rights as well as the laws of the Kingdom of Bahrain, which incorporate all Human Rights requirements as strengthened by various international accords and conventions.</p> <p>Supporting the UN Human Rights Principles is explicitly stated in Alba's Social Management Policy:</p> <p><a href="https://www.albasmelter.com/uploads/x4ltjwii_gfs.pdf">https://www.albasmelter.com/uploads/x4ltjwii_gfs.pdf</a></p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity is committed to promoting and protecting women's rights and has implemented policies and procedures in line with local laws and the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Entity regularly assesses its compliance with CEDAW to ensure that it upholds internationally recognised women's rights. Local ministerial orders related to female Workers are also diligently incorporated in the Entity's Policies and procedures. These are essential considerations to the Entity's Social Management System, which is based on the principles of the Social Accountability SA8000 standard.</p> <p>The Human Resources Policy comprises of women's rights by inclusion of gender equality, elimination of Discrimination in a field of employment, rights for employment opportunities, job security and all benefits and conditions of service and the right to receive vocational training and retraining, equal Remuneration, social security, protection of health and to safety in working conditions and others.</p> <p>The effectiveness of the measures taken to promote gender equity are presented in the Alba Sustainability Report on pages 67, 69. 71 and 79.</p> <p><a href="https://www.albasmelter.com/uploads/Alba_s_Sustainability_Report.pdf">https://www.albasmelter.com/uploads/Alba_s_Sustainability_Report.pdf</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable, as there are no identified cultural and sacred heritage features within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no identified cultural and sacred heritage features within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as there have been no incidences of displacement during the construction and operation of the Entity.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is situated in an industrial area designated by the Kingdom of Bahrain, and there are no adjacent residential communities that are located near the Facilities. While this is the case, the Entity proactively conducts Environment and Social Impact Assessment (ESIA) and initiates engagement plans for any New Projects to ensure that any adverse impact on the rights and interests of Local Communities is identified and mitigated.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Minor Non-Conformance	The Entity has been working and advancing since the previous Audit to re-evaluate its Responsible Sourcing Policy, Social Management System and Supplier Due Diligence practices including the existence of Conflict-Affected and High-Risk Areas (CAHRAs) and accordingly develop Stakeholders communications and reporting in alignment with national and International requirements, and meeting Stakeholders expectations such as London Metal Exchange Responsible sourcing, OECD and EU Due Diligence law. Additionally, Environment and Social Impact Assessment (ESIA) is being undertaken address Human Rights as per IFC performance standard and/or lender requirements. As a matter of transparency, ESIA reports are publicly disclosed. <a href="https://www.albasmelter.com/uploads/Stakeholder_Engagement_Plan_of_Reduction_Line_6_and_PS5_v02.pdf">https://www.albasmelter.com/uploads/Stakeholder_Engagement_Plan_of_Reduction_Line_6_and_PS5_v02.pdf</a>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Minor Non-Conformance	Whilst a Human Rights Impact Assessment and supply chain assessment process has been developed and implemented (and the findings were addressed in the Manual - Social Management System), it is evident that the OECD Due Diligence Guidelines requirements were not fully adhered to.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Minor Non-Conformance	Whilst a Human Rights Impact Assessment and supply chain assessment process has been developed and implemented (and the findings were addressed in the "Manual - Social Management System), it is evident that the OECD Due Diligence Guidelines requirements were not fully adhered to.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Minor Non-Conformance	Whilst a Human Rights Impact Assessment and supply chain assessment process has been developed and implemented (and the findings were addressed in the Manual - Social Management System),

CRITERION	RATING	COMMENT
		however there was no evidence of an audit of Due Diligence practices (e.g. for the upstream supply chain).
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	Whilst a Human Rights Impact Assessment and supply chain assessment process has been developed and implemented (and the findings were addressed in the Manual - Social Management System), however there was no evidence of annual reporting of these risks.
9.9 Security practice	Conformance	The Entity has implemented a security procedure that aims to ensure the physical and environmental security of all individuals and properties inside their Facilities. The Entity also provides adequate training programs to its security staff upon joining and periodically on performing their duties as security personnel including respecting the Human Rights of all the Stakeholders they deal with.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The SHE Policy and Management System Manual is effectively documented, controlled, implemented, and communicated to all relevant parties. Endorsed by the CEO, it undergoes regular reviews to ensure that it remains suitable and effective, and that necessary resources for adequate implementation have been identified and provided. The Entity has a biannual internal audit of the SHE Management System and is externally audited by a reputable and accredited auditing firm. The Entity has obtained its certification for the ISO 45001:2018 Occupational Health and Safety Management System Standard.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the Entity is located in the Kingdom of Bahrain, which does not restrict Labour Unions.
10.2a-c Child Labour	Conformance	The Entity has implemented Policies and procedures to ensure compliance with Workers/employees' minimum age requirements as established by relevant legislation.
10.3a-c Forced Labour	Conformance	The Entity has maintained Policy and practices on Forced Labour. Workers interviews confirmed that there is no practice of Forced Labour such as keeping original documents. The Forced Labour aspect is also included in contractor audits which are undertaken periodically. The understanding of Modern Slavery, and Human Trafficking among employees was found to be satisfactory. Senior management has committed to avoid and mitigate Modern Slavery and Human Trafficking in its business practices. The Entity publicly discloses this commitment via its Statement of Modern Slavery and Human Trafficking endorsed by senior management. <a href="https://www.albasmelter.com/uploads/Statement_on_Modern_Slavery_and_Human_Trafficking.pdf">https://www.albasmelter.com/uploads/Statement_on_Modern_Slavery_and_Human_Trafficking.pdf</a>
10.4a-c Non-Discrimination	Conformance	The Entity provides equal opportunities and prohibits Discrimination in all aspects of employment, including hiring, salary, promotion, training, advancement opportunities, and termination. The relevant Human Resources Policies apply to all employees regardless of gender, race, national or social origin, religion, disability, political affiliation, sexual

CRITERION	RATING	COMMENT
		orientation, marital status, family responsibilities, age, or any other characteristic that could lead to Discrimination.
10.5 Communication and engagement	Conformance	The Entity fosters open communication and direct engagement with its employees and their representatives to address working conditions and resolve workplace and compensation issues. This is done without the threat of reprisal, intimidation, or harassment. The Human Resources Policies and varied communication channels for grievances and appeals are also made consistently accessible to employees from the time of recruitment.
10.6a-g Violence and Harassment	Conformance	Following a clear Human Resources Disciplinary Procedure, the Entity prohibits the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence. The Entity also has a defined grievance procedure for employees to appeal disciplinary decisions. The Disciplinary Code is also communicated to all employees including new hires. The Entity's robust Social Management System covers all human resources issues, including harassment and violations. The Entity's approach to harassment is described in the Alba Sustainability Report on page 62. <a href="https://www.albasmelter.com/uploads/Alba_s_Sustainability_Report.pdf">https://www.albasmelter.com/uploads/Alba_s_Sustainability_Report.pdf</a>
10.7a-c Remuneration	Conformance	The Entity offers its employees competitive salary packages that typically exceed the legal or industry minimum wage standards, with attractive allowance schemes that are sufficient to meet their basic requirements.
10.8a-c Working Time	Conformance	The Entity ensures that its employees' work hours are in compliance with the Bahrain labour law and has established procedures for Overtime work. The Entity regularly monitors the total working hours of each employee. This procedure is supported by a dedicated system called the Payroll Transaction Record (PTR), which accurately calculates the hours worked by employees and any Overtime claims. Additionally, the system is utilised to identify any Contractors who exceed a 12-hour workday limit. A database also generates a daily report for any violations made, and the relevant manager receives violation reports for any Contractors who work under their department's supervision.
10.9a-b Informing Workers of Rights	Conformance	The Entity ensures that all Workers are aware of their rights by upholding the Social Management Policy and SHE Policy, implementing their Social Management System Manual, and maintaining access to all appropriate channels of communication. All employees have undergone onboarding training sessions that emphasise their rights and obligations.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity's SHE Policy and Management System Manual is effectively documented, controlled, implemented, and communicated to all relevant parties. Endorsed by the CEO, it undergoes regular reviews to ensure that it remains suitable and effective, and that necessary resources for adequate implementation have been identified and provided. The Entity has a biannual internal audit of its SHE Management System and is externally audited by a reputable and

CRITERION	RATING	COMMENT
		accredited auditing firm. The Entity has obtained its certification for the ISO 45001:2018 Occupational Health and Safety (OH&S) Management System Standard.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity regularly reviews its OH&amp;S performance to evaluate progress and suggest improvements, which is done on a daily, weekly, monthly, quarterly, bi-annual, and annual basis. The executives, senior management, and union members hold monthly SHE Committee meetings, chaired by the CEO. These are important and in-depth meetings to review the Entity's overall health, safety, fire and industrial hygiene performance.</p> <p>The Entity undertakes a biannual internal audit of its SHE Management System, and is externally audited by a reputable and accredited auditing firm. The Entity has obtained its certification for the ISO 45001:2018 Occupational Health and Safety Management System Standard. An entire section on OH&amp;S is included in the Alba Sustainability Report 2021, pages 46-52:  <a href="https://www.albasmelter.com/en/category/publications#videogallery-3">https://www.albasmelter.com/en/category/publications#videogallery-3</a></p> <p>The annual performance of the Entity's OHS system is reported via the Sustainability Report, page 46:  <a href="https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf">https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf</a></p> <p>There is an OH&amp;S KPIs dashboard to capture performance as well as compare with peers including the Gulf Aluminium Council (GAC).</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity acknowledges the benefits of engaging its Workers and employees to gather information and insights, discuss analyse, and participate in OH&amp;S issues and solutions. Aside from regular unit, committee, and Labour Union meetings, all OH&amp;S related training sessions for Workers are monitored to comply with the SHE Management System.</p> <p>The Entity undertakes periodic safety training and is recorded as a KPI. Employees receive regular safety training and there is an incentive program for safety achievement to reward and recognise safety behaviour and safety performance. There is practice for incident investigation by a cross functional team including the trade union.</p>

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	15 January 2020	Initial Certification Audit – Full Certification
1	31 October 2021	Surveillance Audit



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|---|-----------------|---|
| 2 | 15 January 2023 | Re-Certification Audit – Provisional Certification<br>Scope Change to apply PS V3 |
| 3 | 31 August 2023  | Surveillance Audit – Full Certification   |