

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Aluminium Bahrain B.S.C. (Alba)

CERTIFICATE
NUMBER

63

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

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 stylized, handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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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 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">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (3 – 7 November 2019)Surveillance Audit (28 – 30 June 2021)Re-Certification Audit and Scope Change (23 – 27 October 2022)Surveillance Audit (7 – 9 August 2023)Surveillance Audit (17 – 20 February 2025)
AUDIT FIRM	Cetizion Verifica
AUDIT DATE	<ul style="list-style-type: none">3 – 7 November 2019 (Initial Certification Audit)28 – 30 June 2021 (Surveillance Audit)23 – 27 October 2022 (Re-Certification Audit and Scope Change)7 – 9 August 2023 (Surveillance Audit)17 – 20 February 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">20 November 2019 (Initial Certification Audit)7 October 2021 (Surveillance Audit)14 March 2023 (Re-Certification Audit and Scope Change)17 August 2023 (Surveillance Audit)10 March 2025 (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 applicable criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit (28 – 30 June 2021)

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.

Surveillance Audit (17 – 20 February 2025)

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.

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.

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- ☑ 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.
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CERTIFICATION PERIOD	31 August 2023 – 30 August 2026
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DATE	30 August 2026
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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.

ENTITY OVERVIEW

Aluminium Bahrain (Alba) (the 'Entity') is one of the largest smelters in the world and currently produces over 1.62 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
SYSTEMS	Medium	Medium	Medium	Medium
RISKS	Medium	Medium	Medium	Medium
PERFORMANCE	Medium	Medium	Medium	Medium
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has appropriate systems in place to maintain awareness of, and 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.</p> <p>The updates in legal requirements are regularly received, reviewed and necessary actions have been taken. Each of the Entity's functions has maintained its applicable legal requirement register and each undertake periodic monitoring.</p>
1.2 Anti-Corruption	Conformance	<p>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.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has updated its Code of Conduct in 2023, which has been approved by the Entity's Board: https://www.albasmelter.com/uploads/CodeofConductEN_1.pdf Training on these changes has been provided to employees.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>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.</p> <p>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.</p> <p>The Entity has effectively communicated the Environmental, Social and Governance Policy to its Stakeholders.</p>
2.2a-c Leadership	Conformance	<p>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.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity maintains ISO 14001:2015 certification which is subjected to periodic audits by an independent accredited certification body.</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has a documented Social Management System in the form of a social manual in line with international standard SA8000.</p>

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has re-evaluated its Responsible Sourcing Policy and Supplier Due Diligence practices in alignment with National and International requirements, and to meet Stakeholders expectations including (but not limited to) the London Metal Exchange (LME) Responsible Sourcing requirements, the European Union (EU) Due Diligence legal requirements and the ASI Performance Standard.</p> <p>The Entity has reviewed and updated its Sustainable and Responsibility Policy (in both English and Arabic), last updated in April 2024 and publicly available at: https://www.albasmelter.com/uploads/Sustainable_and_Responsible_Supply_Chain_Policy.pdf</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>Where appropriate, the Entity has shown a commitment to conducting relevant Impact Assessments 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.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>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: https://www.albasmelter.com/uploads/x4ltjwil_gfs.pdf https://www.albasmelter.com/uploads/Sustainability_Report_2021.pdf</p> <p>Additionally, the Entity has adopted Equator Principle 4 which mandates the development of a dedicated Human Rights Impact Assessment for new projects: https://www.albasmelter.com/uploads/ESIA_Report_of_PS5_Block_4_Expansion_Project.pdf</p> <p>A Due Diligence audit was undertaken by an independent environment and social consultant for the Major Change associated with the power plant expansion project.</p>
2.7a-f Emergency Response Plan	Conformance	<p>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.</p> <p>The Entity's Business Continuity Management (BCM) Policy is publicly accessible at: https://www.albasmelter.com/uploads/Business_Continuity_Management_Policy.pdf</p> <p>The Entity's Sustainability Report 2021 includes an emergency preparedness and response, page 52: https://www.albasmelter.com/en/category/publications</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has established a Business Continuity Management Strategy as well as an Enterprise Risk Management Framework to</p>

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>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has published and disclosed its 2023 Sustainability Report for the period 1 January – 31 December 2023. The materiality assessment (page 12 and 15) and Governance approach towards ESG (pages 41-43) are detailed in the Report: https://www.albasmelter.com/uploads/ESGReport2023.pdf</p> <p>The Entity's 2024 Sustainability Report is under development and will be released in mid-2025.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>There is no incident of non-compliance with Applicable Laws as per discussion and disclosure on page 4 of the 2023 Sustainability Report: https://www.albasmelter.com/uploads/ESGReport2023.pdf</p> <p>Internal audit reports relating to the Entity's various departments were reviewed during the Audit and no non-compliance with legal requirements were noted.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has disclosed payments to Government on page 58 of the 2023 Sustainability Report (3 million BHD (local currency)): https://www.albasmelter.com/uploads/ESGReport2023.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has publicly disclosed a communication channel for Stakeholders to raise any complaint or request for information: https://www.albasmelter.com/en/category/code-of-conduct https://secure.ethicspoint.com/domain/media/en/gui/18847/index.html</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has conducted a Life Cycle Assessment (LCA) of its product mix, per one tonne of primary Aluminium using a 'cradle to gate' methodology. The LCA reports provides information on system boundaries, application of the 'cut off' rule and overall LCA results.</p>

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The LCA results are made available to any interested parties such as customers. Public disclosure (as a summary) is provided on page 23 of the 2023 Sustainability Report: https://www.albasmelter.com/uploads/ESGReport2023.pdf
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity monitors and targets the reduction of Scrap from the Aluminium process and recycles all internal Scrap generated in the smelter. The Entity has a comprehensive strategy for reducing GHG emissions that includes a focus on the Circular Economy, which involves acquiring Post-Consumer Scrap material and remelting it onsite. The related disclosure has been made on pages 10 and 23 of the 2023 Sustainability Report: https://www.albasmelter.com/uploads/ESGReport2023.pdf
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. https://www.albasmelter.com/en/category/esg-roadmap
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has publicly disclosed its Greenhouse Gas (GHG) emissions and energy performance on pages 17, 50-51 of the 2023 Sustainability Report: https://www.albasmelter.com/uploads/ESGReport2023.pdf
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 Entity has calculated its GHG emissions intensity, as per its decarbonisation roadmap and actual performance, and the GHG emissions intensity (Scope 1, 2 and 3) as of end of year 2024 is below the required 13.0 tonnes CO ₂ e/tonne of Aluminium (between 11-13 tonnes CO ₂ e as per point 6.9 of de-carbonization road map developed as per the ASI GHG Pathways Calculation Tool). With recent commissioning (February 2025) of Power Station 5 (PS5), Block 4 is a new 680 Megawatt (MW) combined-cycle power plant that expands the existing PS5 facility and will reduce the Entity's GHG emissions and achieve the threshold limit of 11 t CO ₂ e/t Al by year 2030.

CRITERION	RATING	COMMENT
		https://www.albasmelter.com/en/category/power-station-5-block-4-expansion-project
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has developed a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario, using the ASI GHG Pathways Calculation Tool, and detailed in its decarbonization roadmap.</p> <p>In addition to recent upgrades to the power station, other GHG emission reduction actions planned includes becoming a signatory of the Sea Cargo Charter, underlining commitment to sustainable maritime shipping. The Entity will be the first from Bahrain and the second signatory from the Middle East to join the Charter.</p> <p>https://www.albasmelter.com/en/article/alba-joins-sea-cargo-charter-as-its-newest-signatory-reinforcing-sustainable-shipping-commitment</p>
5.3b-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity's GHG Emissions Reduction Pathway includes an Intermediate Target (year on year basis) including Entity-specific Direct and Indirect GHG emissions and has been developed using the ASI GHG Pathways Calculation Tool and developed by IAI, (reference section 6.9 of Entity's decarbonisation roadmap). The 'year on year' reduction targets are as per the developed curve (Scopes 1+2 & 3) which form the Intermediate Targets.</p> <p>The Entity's Sustainability Report includes a limited disclosure of decarbonisation actions and current reports their 2035 and 2060 targets. However, the Entity has not publicly disclosed its GHG Emissions Reduction Pathway and GHG Emissions Reduction Plan.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has developed appropriate Management System requirements and governance practices that facilitates GHG management across the Entity, as reflected as part of the management statement and ESG roadmap, which are publicly detailed on pages 6 and 10 of the 2023 Sustainability Report:</p> <p>https://www.albasmelter.com/uploads/ESGReport2023.pdf</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Related air emission disclosures are made in the 2023 Sustainability Report on pages 19, 51, 71-74:</p> <p>https://www.albasmelter.com/uploads/ESGReport2023.pdf</p> <p>The Entity's particulate emissions have improved (in kg/ t Al) since 2022 and all other emissions have also reduced. The Entity has developed a management plan to reduce emission levels which has been implemented during 2024.</p>
6.2a-g Discharges to Water	Conformance	<p>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.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established procedures to appropriately manage its Spills and Leakages. It understands 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.</p>

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>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 Entity has publicly disclosed information on Spills and Leakages on pages 4, 16 and 22 of the 2023 Sustainability Report: https://www.albasmelter.com/uploads/ESGReport2023.pdf</p> <p>During the Audit site walkover, no evidence of Spills or Leakages was noted.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity is working towards reduction of Waste sent to landfill and improving the recycling of waste products. Approximately 82 percent of Waste was recycled during 2023. The various actions undertaken by the Entity are publicly disclosed on page 23 of the 2023 Sustainability Report: https://www.albasmelter.com/uploads/ESGReport2023.pdf</p>
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	<p>There is no residue waste generated out of the Entity's Spent Pot Lining (SPL) facility and some of the leading practices include heat recovery from the hydrolysis process being re-used in rotary furnaces where oxidation also removes cyanide residues.</p> <p>The finished goods are tested by an accredited laboratory to confirm that there are no hazardous materials beyond permissible limits. The related disclosures are made on pages 23 and 52 in the 2023 Sustainability Report: https://www.albasmelter.com/uploads/ESGReport2023.pdf</p>
6.8a-d Dross	Conformance	<p>The Entity manages Dross and abated leachate to the environment in accordance with 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.</p> <p>https://www.albasmelter.com/en/article/alba-reports-its-financial-results-for-the-fourth-quarter-and-12-months-of-2024</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The water management and consumption-related information are disclosed in the 2023 Sustainability Report: https://www.albasmelter.com/uploads/ESGReport2023.pdf</p> <p>The water intake, consumption and discharge quantities are recorded monthly. The Entity has conducted detailed water risk assessments as part of the Entity's water management and stewardship, identifying severity, probability and risk score, where the overall risk score determined the risk as insignificant.</p>
7.2a-e Water Management	Conformance	<p>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.</p>

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
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: https://www.albassembler.com/en/category/publications#videogallery-3</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	<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 service and has implemented practices to manage this effectively.</p>
8.2a-g Biodiversity Management	Conformance	<p>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.</p>
8.3a-c Management of Priority Ecosystem Services	Conformance	<p>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.</p>
8.4 Alien Species	Conformance	<p>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.</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	<p>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.</p>
8.6a-d Protected Areas	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no terrestrial or marine Protected Areas within the Entity's Area of Influence.</p>
8.6e Protected Areas – Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
8.7a-i Mine Rehabilitation	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9. HUMAN RIGHTS		

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has developed a Social Management Policy in alignment with National and International instrument including UN Human Rights, signed by the Entity's CEO: https://www.albasmelter.com/uploads/x4ltjwil_gfs.pdf</p> <p>https://www.albasmelter.com/uploads/Contractors_Social_Performance_Monitoring_Rev_07.pdf</p> <p>There is periodic monitoring undertaken by the Entity to assess conformance of its Social Management System including Human Rights issues. The Entity is working with external Stakeholders such as the Labour Market Regulatory Authority (LMRA) and International Organization for Migration (IOM) and conducted a Human Rights session in March 2024.</p> <p>The Entity has also conducted a Human Rights Impact Assessment for its power plant expansion project which has been made publicly available. Further details, including the type of Human Rights impacted, Rightsholders and potential impacts, are available in Section 5, table 11: https://www.albasmelter.com/uploads/Block_4_Human_Rights_Assessment_Report.pdf Section 5, table 11 details type of Human Rights, rightsholders, potential impact.</p> <p>The Stakeholder engagement plan, last updated January 2023, is publicly available at: https://www.albasmelter.com/uploads/Alba_PS5_Block_4_Stakeholder_Identification_and_Mapping_Final.pdf</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 employment Discrimination, 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 safe working conditions.</p> <p>The effectiveness of the measures taken to promote gender equity have been made on pages 31-32 of the 2023 Sustainability Report at: https://www.albasmelter.com/uploads/ESGReport2023.pdf</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.

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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	Conformance	The Entity has established a sound Social Management System and exercised risk-based Due Diligence over its Aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance)
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has Identified and assessed risks related to Conflict-Affected and High-Risk Areas (CAHRAs) in its Aluminium supply chain using the TDi CAHRA Index and EU CAHRA list, last reviewed in April 2024. The CAHRA risk assessment is to be updated and repeated every two years.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has developed a strategy to respond to risks identified in CAHRAs as required, and further detailed in the Entity operating procedure that includes a 'step by step' mitigation plan and allocates responsibilities.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity has commenced auditing its supply chain on ESG criterion including CAHRAs. Most of the Entity's Alumina suppliers are ASI Performance Standard v3 Certified Entities. Additionally, the Entity is working with Alumina suppliers to map Bauxite Mining and transit routes, identify risks and develop appropriate Due Diligence on-going requirements.</p> <p>This ASI Audit also satisfies the requirements of this Criterion.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	Whilst the Entity had conducted supply chain Due Diligence related to CAHRAs during 2024, this information has not been publicly disclosed. The Entity is planning to publicly disclose supply chain CAHRAs Due Diligence in the 2024 Sustainability Report.

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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.
10. LABOUR RIGHTS		
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	<p>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.</p> <p>The Entity has publicly disclosed measures taken to prevent Modern Slavery: https://www.albassembler.com/uploads/Statement_on_Modern_Slavery_and_Human_Trafficking_1.pdf</p>
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 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

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		grievances and appeals are also made consistently accessible to employees from the time of recruitment.
10.6a-g Violence and Harassment	Conformance	<p>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.</p> <p>https://www.albasmelter.com/uploads/Alba_s_Sustainability_Report.pdf</p>
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.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity's Safety, Health and Environment (SHE) Policy and Management System Manual is effectively documented, controlled, implemented, and communicated to all relevant parties. Endorsed by the Entity's 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 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 certification for the ISO 45001:2018 Occupational Health and Safety (OH&S) Management System Standard.
11.1b-e Occupational Health and Safety (OH&S)	Conformance	The Entity holds monthly Safety and Health and ESG Committee meetings which are attended by Directors, Managers and the SHE team. The agenda includes discussion on leading and lagging OH&S

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Management System - Reviews and disclosure		<p>indicators as well as discussions on SHE, and fire training, the Alba wellbeing program, absenteeism and incident statistics.</p> <p>Benchmarking using data provided by the Gulf Aluminium Council (GAC) smelter members is undertaken on a quarterly basis. OH&S performance statistics are included in the 2023 Sustainability Report.</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&S issues and solutions. Aside from regular unit, committee, and Labour Union meetings, all OH&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
2	15 January 2023	Re-Certification Audit – Provisional Certification Scope Change to apply PS V3
3	31 August 2023	Surveillance Audit – Full Certification
4	18 April 2025	Surveillance Audit