
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**EMIRATES
GLOBAL
ALUMINIUM PJSC**

CERTIFICATE
NUMBER

27

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

9 MAY 2019

DATE OF EXPIRY

8 MAY 2022

CERTIFIED SINCE

9 MAY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a white background.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

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

CERTIFICATION SCOPE

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

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

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

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

At the time of the Audit (October 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouse

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

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

9 May 2019 – 8 May 2022

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

7 May 2022

CERTIFICATE
NUMBER

27

SUMMARY OF FINDINGS

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

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity maintains ISO14001:2015 certification from an independent third-party. https://www.ega.ae/media/1410/c-users-em3545-desktop-ega_iso-14001_2015-certificate.pdf
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented a well-documented standalone Social Management System.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has taken up well designed programme for responsible sourcing as part of its purchasing process. https://www.ega.ae/en/suppliers/developing-a-sustainable-supply-chain/ The Entity is well moving on Responsible Sourcing Policy implementation across supply chain using risk based approach showing credible improvements on high risk supply partners. However, there are some missing controls within the Entity to give confidence some key outsourced processes or service providers are progressing on obligations with respect to Entity's suppliers' code of conduct.
2.5 Impact Assessments	Conformance	The Entity conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new projects or major changes to existing facilities. Actions are proposed and considered as needed.
2.6 Emergency Response Plan	Conformance	The Entity has site specific emergency response plans developed in collaboration with potentially affected stakeholders groups which are periodically tested through drills. Involvement of stakeholders such as Workers and relevant agencies were evidenced. The Entity competent and dedicated fire fighting crew available on site 24x7.
2.7 Mergers and Acquisitions	Conformance	The Entity has adequate procedures and resources for Mergers and Acquisitions (M&A) that address environmental, social and governance issues in the due diligence process.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity maintains adequate decommissioning procedure to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity prepares and publishes annual sustainability report disclosing its governance approach and its material environmental, social and economic impacts in line with GRI standards with independent assurance for key elements.

CRITERION	RATING	COMMENT
		Sustainability report is available in Entity's website as public document. https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. There are no significant fines or penalties imposed on the Entity as reported in 2019 sustainability report, in page 105. https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has adequate system to make, or have made on its behalf, payments to governments on a legal and/or contractual basis. Entity has zero tolerance to bribery in all business dealings and relationships. Entity's policy prohibits bribery, including facilitation payments.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has adequate system that is publicly available to address stakeholder complaints, grievances and requests for information relating to its operations. Entity operates certified management systems in accordance with ISO 14001:2015 and ISO 45001:2018. The Entity maintains required information in its website for ease of contact. https://www.ega.ae/en/contact-us/
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated life cycle impacts of its major product lines for which Aluminium is considered or used. A process to ensure the life cycle impact information is updated ongoing basis as needed.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity provides adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium product(s) to customers upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	The Entity has neither made public communication nor has it received any request for public communication about LCA of its products.
4.2 Product design	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has good process control and management reporting for scrap aimed for minimization including reuse/recycling with a target of 100%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates its alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has aluminium recycling strategy including specific activities.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is member and sponsor in Emirates Environment Group (non-governmental organization) in driving aluminium waste collection & recycling across the nation.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts and publicly discloses scope1 and scope2 greenhouse (GHG) emissions and energy use by source on an annual basis through its sustainability report available in its website. Refer page 60 to 65 in 2019 annual sustainability report: https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf
5.2 GHG emissions reductions	Conformance	The Entity publishes time-bound GHG emissions reduction targets in its annual sustainability report, page 65. https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf The Entity implement a plan to achieve these targets covering the material sources of Direct and Indirect GHG Emissions by developing and implementing Carbon Abatement Strategy 2019-2023.
5.3a Aluminium Smelting (management system)	Conformance	The Entity operates its environmental management system in accordance with ISO 14001:2015 that has adequate evaluation procedures and operating controls to limit direct GHG emissions. https://www.ega.ae/media/1410/c-users-em3545-desktop-ega_iso-14001_2015-certificate.pdf
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity currently emits (scope1 and scope2 emissions) less than 8 tonnes CO2-eq per metric tonne aluminium, independently verified and assured as part of its sustainability reporting process. https://www.ega.ae/en/sustainability/our-approach
5.3c Aluminium Smelting (after 2020)	Conformance	The Entity has suitable Impact Assessment process confirming the GHG emission Scope 1 and Scope 2 GHG emissions from expansions would be below 8

CRITERION	RATING	COMMENT
		tonnes CO2-eq per metric tonne Aluminium, when constructed.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	Air emissions programme is implemented within its ISO 14001 system in line with local regulations and own standards. Emissions to the air are under control and found to be well within compliance limits.
6.2 Discharges to Water	Conformance	The Entity quantifies and reports discharges to water. Seawater is used for cooling purposes and a part of it is desalinated to produce potable water for own consumption. The Entity operates "Operation Environment and Social Management Plan" (OESMP) to ensure the adverse effects are minimized and all regulatory requirements are complied with.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity assesses the potential and major areas where spills or leaks may occur through risk assessment and registry.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity maintains an environmental management system that has adequate procedures for management and external communication plans, compliance controls and a monitoring programme to prevent and detect spills and leakage. Borewells for groundwater monitoring are available and tested periodically.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity's environmental management system has adequate procedures for reporting of spills internally and externally to stakeholders and regulators.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity's 2019 annual sustainability report in page 68, includes spills that occurred detailing the impact and remediation. There were no significant reportable spills 2017 onwards. https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity implements a waste management control plan as part of Operation Environment and Social Management Plan (OESMP) which has been developed based on waste control hierarchy covering reduce, reuse, recycle, recover and responsibly dispose.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publishes annual sustainability report as public document that contains data about quantity of hazardous and non-hazardous waste generated as well as associated waste disposal methods. Refer 2019 sustainability report, page 69 to 71

CRITERION	RATING	COMMENT
		https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity has a robust storage shed onsite for SPL in line with risks and controls assessed through an environmental impact study. SPL is temporarily stored in this shed before sent out for recycling.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity sends SPL to approved pre-treatment facilities where SPL is treated for safe disposal and co-processed in cement industry as feedstock maintaining thermal certificates for co-processed SPL quantities. Refer news article https://www.ega.ae/en/media-releases/2020/march/spl-2019-recycling-day In 2019, The Entity received Environmental award from Gulf Aluminium Council for SPL management, and an award at the 37th International Conference and Exhibition of ICSOBA for its research paper titled 'Environmental Benefits of Using Spent Pot Lining (SPL) in Cement Production'. Refer page 69 and 70 in 2019 annual sustainability report https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity does not landfill any SPL, it is all treated and consumed in cement industry.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	Not applicable since the Entity does not landfill or stockpile.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity's policy, procedure and infrastructure is ensuring no possibility of discharge to marine or aquatic environment.

CRITERION	RATING	COMMENT
6.8a Dross (recovery)	Conformance	The Entity maximizes the recovery of aluminium by sending all generated dross to third-party specialized facilities who process and recover metal from dross. The Entity maintains a dashboard for data regarding metal recovery from dross.
6.8b Dross (recycling)	Conformance	The Entity is currently stockpiling the dross residues. The Entity is working with supply chain partner to build salt washing facility in KIZAD for recycling dross residue. The facility is under commissioning.
6.8c Dross (review of alternatives)	Conformance	The Entity does not landfill dross residue. The Entity is reviewing the options to recycle dross residue and working with supply chain partner to commission salt washing process.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has water balance charts that identify and map its water withdrawal and use by source and type. The Entity draws only seawater.
7.1b Water assessment (risk assessment)	Conformance	Water related risks are addressed as part of the Environmental and Social Impact and Environmental Management System for the entities facility. Though associated risks are evaluated as "low", mitigation actions were suitably implemented.
7.2a Water management (management plans)	Not Applicable	The Entity is located within an arid, desert environment with no sources of freshwater and hence this is not identified as material item as per sustainability risk assessments. This element is not applicable. However, there are water related monitoring programs implemented within the Entity's environmental management system.
7.2b Water management (monitoring)	Conformance	Though water is not identified as material as per risk assessments, there are water management plans implemented within ISO 14001:2015 management system.
7.3 Disclosure of water usage and risks	Conformance	The Entity publicly discloses its water withdrawal, use and risks in its 2019 annual sustainability report, page 66, though it is not material. https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity had assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Area of Influence through ESIA. Public

CRITERION	RATING	COMMENT
		commitment for biodiversity is available at: https://www.ega.ae/en/our-sustainability/environment
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has prepared a Biodiversity Action Plan (BAP) to protect and conserve the biodiversity of the area. BAP is having time bound actions which are monitored and tracked.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Biodiversity Action Planning is performed with participation of identified stakeholders as a consultative mechanism and designed in accordance with the biodiversity mitigation hierarchy (Avoid, Reduce, Remedy, Offset).
8.2c Biodiversity management (reporting)	Conformance	The Entity has disclosed the biodiversity outcomes in page 72 of 2019 Annual Sustainability report addresses biodiversity. https://www.ega.ae/media/2356/ega-2019-sustainability-report.pdf Biodiversity action plan implementation about conservation efforts for the critically endangered Hawksbill turtle was shared with ASI and published as 1st ASI Story of Change Series news sharing in ASI. https://aluminium-stewardship.org/why-aluminium/asi-outcomes-impacts/asi-story-of-change-series/
8.3 Alien Species	Conformance	Potential introduction of alien species is identified (shipping vessels) and managed through ship owners and port authority controls as per national laws.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity’s core policy has commitment to respect human rights which is deployed through its Social Management System.

CRITERION	RATING	COMMENT
9.1b Human Rights Due Diligence (process)	Conformance	The Entity's due diligence process incorporates a risk-based approach, focusing efforts where the risk of adverse human rights impact is most significant.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has not identified to have caused or contributed to adverse human rights impacts but has the process to cover this in line with its core policy and code of conduct.
9.2 Women's Rights	Conformance	The Entity has implemented policies and tools to ensure women's rights are respected at any time, e.g., code of conduct, employee handbook, leave of absence, compensation policy.
9.3 Indigenous Peoples	Not Applicable	The Entity is in a specially created industrial zone where there was no habitation in the past, hence there are no known indigenous people living near the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no indigenous people and hence FPIC is not applicable.
9.5 Cultural and sacred heritage	Not Applicable	There are no sacred or cultural heritage sites and values within the Entity's area of influence, and no communities is in the vicinity of the Entity. Hence, this criterion is not applicable.
9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity is in specially created industrial zone where there were no people living.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity is in specially created industrial zone where there were no people living.
9.7a Local Communities (rights and interests)	Conformance	There are no local community near the Entity since it is in a dedicated industrial zone. However, the Entity has established community stakeholder engagement / consultation programme.
9.7b Local Communities (impacts)	Conformance	There are no known or potential adverse impact to community. Entity holds regular meetings with the local community via a community "Majlis" to get the voice of community. No reported community complaints in the last two years.
9.7c Local Communities (livelihoods)	Conformance	The Entity has developed and implemented Corporate Social Responsibility (CSR) strategy and projects.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has adequate policy and controls for not contributing to armed conflict or human rights abuses in conflict-affected and high-risk areas either directly or through supply chain.

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity has implemented security practices that respect human rights. Entity has engaged a private security service provider and ensures that security practices including the Voluntary Principles on Security and Human Rights, are adhered to.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Freedom of association is restricted under UAE law. However, the Entity has an open culture where employees and contractors can provide feedback associated with any aspect of their employment or work.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Collective bargaining is restricted under UAE law. The Entity has suitable alternate processes where employees and contractors express their feedback on aspects of employment and work that are addressed for resolution.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has various mechanisms such as Mashura Employee Care Centre, Town hall meetings, residential area 'Mosque Tent Meetings', suggestion scheme, hazard & incident reporting, 'Your Voice' compliance program, grievance reporting mechanism for employees and contractors to share their views, feedbacks and suggestions.
10.2a Child Labour (minimum age)	Conformance	The Entity's policies and employment rules are in place to avoid hire of child labour. Entity ensures that this policy is applied through supply chain by supplier declaration to these commitments.
10.2b Child Labour (hazardous)	Conformance	The Entity's policies and employment rules are in place to avoid hire of child labour. Entity ensures that this policy is applied through supply chain by supplier declaration to these commitments.
10.2c Child Labour (worst forms)	Conformance	The Entity's policies and employment rules are in place to avoid hire of child labour. Entity ensures that this policy is applied through supply chain by supplier declaration to these commitments.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has adequate policy and controls for preventing human trafficking either directly or through recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity requires no deposits of any sort from employees and requires the suppliers to follow the same as committed by suppliers in supplier declarations.

CRITERION	RATING	COMMENT
10.3c Forced Labour (migrant workers)	Conformance	The Entity requires no deposits of any sort from employees and requires the suppliers to follow the same as committed by suppliers in supplier declarations.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has policies and controls to ensure workers are not in debt bondage or force them to work in order to pay off a debt. This applies to Entity's suppliers as well.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has processes and resources for free movement of workers either in workplace or in on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has policy and procedures that do not allow retention of original documents of workers.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's employment conditions for termination of employment are in line with national labour laws.
10.4 Non-Discrimination	Conformance	The Entity has policies and controls in place to avoid discrimination practices in all forms of business conduct.
10.5 Communication and engagement	Conformance	The Entity has implemented an open communication process and is regularly reviewing all communications. The Entity has reporting mechanism for any intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity has a transparent and published disciplinary processes in line with national labour laws. Disciplinary actions are implemented in an impartial manner through employee's relation process.
10.7a Remuneration (living wage)	Conformance	The Entity conducts yearly compensation survey and ensures competitiveness in pay and compensation and intends to be an industry benchmarks. The Entity provides discretionary income through special allowances which are more than sufficient to meet the basic needs of Workers.
10.7b Remuneration (method of payment)	Conformance	Payments are made before the end of each month through Entity's payroll system. No instance of delay in salary payments from the establishment date of Entity.
10.8 Working Time	Conformance	The Entity has published employee handbook describing working hours, overtime, week off, public holidays, annual leave, etc. in compliance with local law.

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

Document Control and Version History

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