

ALUMINIUM BAHRAIN B.S.C.

STAKEHOLDER ENGAGEMENT PLAN

POWER STATION 5 – BLOCK 4

Introduction

Document Name and Number

The SEP_PS5_Block4_PLN_V001 is the formal document of Aluminium Bahrain B.S.C. (Alba), also referred to as the Company, detailing its 'Stakeholder Engagement Plan' (SEP) for Power Station 5 (PS5) Block 4 Project, which will be referred to as the 'Project' for the purposes of this document.

Purpose

The purpose of this document is to outline Alba's stakeholder consultation and engagement approach with its stakeholders and the community, which may be affected by or interested in, the Project's construction activities. It presents a culturally appropriate stakeholder engagement framework that meets the obligations and expectations of the Company, the Government and the Lenders' Group.

The SEP also includes Alba's External Grievance Mechanism for any stakeholders or the general public to raise any concerns related to the Company and/or its projects.

The SEP is a live Document and will be updated as needed.

The Objectives of this Document are to:

- Provide an outline of stakeholder engagement in line with International Finance Corporate (IFC) Performance Standards and Equator Principle (EP) IV – July 2020, Bahraini legislations and Lenders' Group and other financing institutions;
- Identify stakeholder groups that are affected, and/or influence Alba and its operations;
- Identify effective methods to disseminate information to various stakeholder groups and gather feedback from stakeholders on Alba's operations;
- Identify effective stakeholder engagement techniques to address all stakeholders;
- Identify and develop measures to effectively mitigate Environment and Social (E&S) risks that are likely to arise from the Project through stakeholder consultation and engagement; and
- Include a formal External Grievance Mechanism plan for stakeholders and public to raise any concerns, provide feedback and comments about Alba.

Scope

The scope of this Document is outlined as below:

- Covers all Alba's operations
- Is part of Alba Management Plans

- Has overlaps and links to several other Management plans such as Health, Safety and Environmental Management System (HSEMS), Emergency Preparedness and Response Plan (EPRP), Corporate Communications Plan, Safety, Health and Environment (SHE) Policies and Procedures, Alba Code of Practice (ACOP), etc.
- Does not supplement or replace any of Alba's existing systems such as Legal procedures, Human Resources (HR) policies and procedures, etc. as a whole or any individual department; and
- Provide overarching plan for any SEPs that will be developed and implemented for the construction of any Project in line with national regulatory requirements, IFC Performance Standards (PS) and Equator Principles-IV July 2020 (EP), and the Lenders' Group.

Approvals and Authority

This Document is owned by Alba's Investor Relations (IR) Department. All Request for Changes (RFC) will be addressed to the IR Department, and changes will be implemented after obtaining the requisite Management approvals.

Resources and Responsibilities

Principle roles and responsibilities for the implementation of this SEP are outlined in the below table:

Entity	Responsibilities
IR	<ul style="list-style-type: none"> • Owner and accountable for the Project-related SEP; • Develop and implement the Project-related SEP in compliance with IFC and EP requirements, other international regulatory requirements and/or as given by the Lenders' Group and 'Alba_SEP_PLN_V001'; • Assign a resource to manage the Project-related SEP and the External E&S External Grievance Mechanism who will: <ul style="list-style-type: none"> • Liaise with concerned departments to oversee the implementation of plans related to this SEP; • Perform monitoring and evaluation to track the progress of the SEP and the External E&S Grievance Mechanism; • Liaise with Project teams to oversee stakeholder engagement activities as mentioned in the Environment and Social Impact Assessment (ESIA) and Supplementary ESIA, if any; • Act as a liaison between Project teams and the Lenders' Group to ensure implementation of requirements; • Coordinate Lenders' Group reporting;

Entity	Responsibilities
	<ul style="list-style-type: none"> • Provide for disclosure of any Project-related ESIA disclosure • Draft and publish annual Sustainability Report and Annual Report; • Draft and publish the Annual Report; and • Coordinate regulatory/government reporting when required; and • Carry out Stakeholder Exhibitions Meeting, as required.
Safety, Health & Environment (SHE) and Environment, Social and Governance (ESG)	<ul style="list-style-type: none"> • Coordinate with various government authorities as required; • Implementation and compliance through regular audits of EPC/EPCM contractor; • Meet the required standards through the ESG Framework, SHE Policy, Alba Code of Practices (ACOPs), Statement of Purpose (SOP), Job Safe Practices (JSPs) etc.; • Capture stakeholder engagement activities in the Project's Stakeholder Engagement Register (SER); • Accountable for meeting any requirements as requested by the Lenders Group; and • Oversee and audit all contractors in their implementation of the requirements as mandated by national and international laws, practices, etc. as applicable on the Project.
Block 4 Contractors	<ul style="list-style-type: none"> • Implement Alba HSEMS Plans, Human Resources procedures, Social Performance and other Project requirements; • Prepare and deliver periodic or, as required, reports as required by different departments; • Communicate Alba's External E&S External Grievance Mechanism as well as HR grievance systems to their employees and sub-contractors; • Investigate any grievances raised and keep reports on the same; and • Cooperate with Alba during any investigation of grievances.
ESIA and Supplementary ESIA contractor	<ul style="list-style-type: none"> • Based on identified risks and Project's Area of Influence, identify stakeholder categories and prioritise based on importance and influence on Alba; and • Coordinate with Government authorities and respective Alba Project team and other departments for various plans such as Construction & Environment Social Management Plan, Operations Environmental & Social management Plan, Project-based Traffic Management Plan, Human Resources plans, Human Rights Risk Assessment, etc. and any other relevant consultations.

Cross Links to other Alba Plans

This SEP is linked to other Alba Management Plans and Policies namely:

Emergency Preparedness and Response Plan (EPRP):

The objective of this Plan is to provide detailed procedures that applies to all emergency incidents that occur inside Alba and its vicinity, including the truck haul road, Calcliner and Marine facilities and any construction sites/areas under the authority of Alba. This procedure is also applicable for decommissioning/demolition activities at Alba site.

1. The scope relates to all Alba (and contractor) operations and activities (including the off-site heavy vehicle movements on the Alba Haul Road).
2. While Bahrain Ministry of Interior will respond to any off-site emergencies, Alba (and its Contractors) are responsible for notification of any incidents and are to render such assistance as is possible and appropriate prior to the arrival of the emergency services.

Emergencies within Alba Operations:

The main purpose of the Operation Emergency Plan is to save workers lives, business interruptions and prepare/react to emergencies before, during and after the event at any work area (operation) inside the vicinity of Alba. This area of the procedure will cover the preparedness and response in the following operation emergencies:

1. Gas leakages or/and disturbance of flow from any supply to/from the department;
2. Breakage of gas lines;
3. Liquid pitch spillages;
4. Open circuit at the pot room area;
5. Bridging inside the pot room;
6. Massive oil leakage and spillages;
7. Molten metal spillages beyond control from pot Tap-out and/or metal explosion;
8. Uncontrolled chemical spillages and/or explosions;
9. Explosion of pressured vessels;
10. Accidents that involve rescue or fatal/severe injuries;
11. Any other situation(s) that are identified by the Director of SHE, Fire and Security and the Fire and Security superintendent.

Handling Emergencies Outside Alba Boundaries:

Alba values the society and recognize its role towards its stakeholders. As part of the organization's Corporate Social Responsibility, hence Alba will react to any emergencies that are experienced within the diameter of 500 meter outside Alba's current facility.

The following are the guidelines for reacting to emergencies outside the organization:

1. Alba emergencies that occur outside the organization's vicinity and area (i.e. King Hamad Road, Um AlSaad Road, Road 96 and Downstream Roads) will be handled by the Ministry of Interior responsible directorates and Emergency Response and Operations Center for the Kingdom of Bahrain. However, Alba can provide support in terms of first aid and initial response to control the scene upon the judgement of Alba shift security supervisor.
2. When an emergency occurs to the public outside the vicinity of Alba, the shift supervisor will assess the severity of the situation and will deploy the necessary resources to the scene of emergency without jeopardising the organization's emergency preparedness and response for Alba operation - in case needed.
3. Upon the sole judgment of the shift supervisor, if the external emergency is affecting Alba operations, the supervisor will do the necessary callout in consideration to the emergency callout plan.
4. Except for road traffic accidents that occur on Alba Truck Haul Road, all road traffic accidents shall be dealt by the Ministry of Interior responsible directorate.

Corporate Communications Plan:

Alba's Corporate Communications Plan comprises an annual calendar of events and activities that support the Company's business strategy by providing consistent, timely and accurate messaging to various stakeholders. This Plan also includes Alba's policy on sponsorship initiatives that have a sustainable impact on Bahrain and its economy.

Health, Safety and Environment Management System (HSEMS):

Alba's formal HSEMS ensures the effective management of various safety, environmental and health risks, which in turn guide the management of stakeholder engagement activities. The HSEMS is a tool that defines Alba's commitment, roles, and responsibilities towards the protection of OSH, environment, and the resources. Additionally, it enables Alba to comply with applicable SHE laws, regulations, standards, and policies. It also provides a common framework to promote the self-regulation of SHE management system.

Alba has established, documented, implemented, and shall maintain the HSEMS in accordance with the requirement of ISO 45001:2018 and ISO 14001:2015.

Safety, Health and Environment (SHE) Policy:

Alba Executives and Senior Management are fully committed to continually improve SHE in and around Alba, as well as of its stakeholders. Alba SHE policy is a commitment to all its stakeholders to comply with workplace SHE standards and procedures and strive towards eliminating harm.

External E&S Grievance Mechanism:

It is Alba's formal process designed to receive and facilitate the resolution of E&S grievances from the community, as well as provide a summary of the E&S performance on grievances received and resolved.

This SEP does not replace or substitute any of the aforementioned plans or any of Alba's other policies and procedures.

REGULATORY FRAMEWORK AND REPORTING

Introduction

The purpose of this section is to set out the requirements that apply to stakeholder engagement, which are derived from:

- National laws and regulations;
- IFC Performance Standards and EP – IV; and
- Alba’s existing HSEMS, SHE Policy, ESG Framework, etc.

National Laws and Regulations

There are no established Bahraini laws and regulations specifying stakeholder engagement. However, Alba will follow all the stipulated E&S laws as well as ensure that all contractors and sub-contractors meet all the environmental and social standards and guidelines. Alba also has in place relevant contracts and systems conforming to the respective regulatory framework of the Government entities and bodies.

Applicable International Standards and Guidelines

Alba is committed to comply with the IFC Performance Standard 1 and EP IV – July 2020 as part of the financing arrangements for the Line 6 Expansion Project. The requirements for stakeholder engagement are outlined in the below Table 1.

Standard	Category	Requirements
IFC Performance Standard 1	Stakeholder Engagement	<ul style="list-style-type: none"> • Identify people or communities that are or could be affected by the project, as well as other interested parties. • Ensure that such stakeholders are appropriately engaged on E&S issues that could potentially affect them through a process of information disclosure and meaningful consultation. • Develop and implement an SEP that is scaled to the Project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities. • Undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on Project risks, impacts and mitigation measures.

Standard	Category	Requirements
		<ul style="list-style-type: none"> • The ESIA risks and impacts identification should take account of the outcome of the engagement process with Affected Communities as appropriate. • Engagement should be based on the timely and effective dissemination of relevant Project information, including the results of the process of identification of E&S risks and impacts and corresponding mitigation measures, in languages and methods preferred by the Affected Communities and that allow for meaningful communication. • Affected communities should be engaged on issues that could potentially affect them, throughout the Project cycle. • Allow the views, interests and concerns of different stakeholders, particularly of the local communities directly affected by the Project (Affected Communities), to be heard, understood, and taken into account.
Equator Principle 5	Stakeholder Engagement	<ul style="list-style-type: none"> • Demonstrate effective stakeholder engagement as an ongoing process in a structured and culturally appropriate manner with Affected Communities and, where relevant, Other Stakeholders. Tailor the consultation process to: the risks and impacts of the Project; the Project's phase of development; the language preferences of the Affected Communities; their decision-making processes; and the needs of disadvantaged and vulnerable groups. • The consultation process should be free from external manipulation, interference, coercion and intimidation. • To facilitate stakeholder engagement, make the appropriate Assessment Documentation readily available to the Affected Communities, and where relevant Other Stakeholders, in the local language and in a culturally appropriate manner. • Take account of, and document, the results of the Stakeholder Engagement process, including any actions agreed resulting from such process. • For projects with environmental or social risks and adverse impacts, disclosure should occur early in the Assessment

Standard	Category	Requirements
		process, in any event before the project construction commences, and on an ongoing basis.
IFC Performance Standard 1	Grievance Mechanism	<ul style="list-style-type: none"> Establish a grievance mechanism to receive and facilitate resolution of the affected stakeholders' concerns and grievances about the Project's environmental and social performance. Grievances raised by stakeholders need to be managed through a transparent process, which is culturally appropriate, understandable, readily acceptable to all segments of affected communities, at no cost and without retribution. The mechanism should seek to resolve concerns promptly. The mechanism should be appropriate to the scale of impacts and risks presented by a project and beneficial for both the company and stakeholders. The mechanism must not impede access to other judicial or administrative remedies. Affected Communities should be informed about the mechanism in the course of the stakeholder engagement process.
IFC Performance Standard 4	Grievance Mechanism	<ul style="list-style-type: none"> A grievance mechanism should allow the affected community to express concerns about the Community Health, Safety and Security.
Equator Principle 6	Grievance Mechanism	<ul style="list-style-type: none"> Establish a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's E&S performance. The grievance mechanism is required to be scaled to the risks and impacts of the Project and have Affected Communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies.

Standard	Category	Requirements
		<ul style="list-style-type: none"> Affected Communities should be informed about the mechanism in the course of the stakeholder engagement process.
IFC Performance Standard 1	Information Disclosure	<ul style="list-style-type: none"> It is regarded as international good practice to ensure that information is provided to stakeholders in a way that would enable them to make contributions meaningfully. Provide Affected Communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures. Provide periodic reports to the Affected Communities that describe progress with implementation of the Project on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually.
Equator Principle 10	Information Disclosure	<ul style="list-style-type: none"> At a minimum, a summary of the ESIA should be made accessible and available online. Publicly report GHG emission levels (combined Scope 1 and Scope 2 Emissions) during the operational phase for Projects emitting over 100,000 tonnes of CO2 equivalent annually
IFC Performance Standard 1 and 4	Emergency Preparedness and Response	<ul style="list-style-type: none"> Document the emergency preparedness and response activities, resources, and responsibilities, and provide appropriate information to potentially Affected Community and relevant government agencies. Emergency plans should address emergency contacts and communication systems/protocols (including communication with Affected Communities when necessary), and procedures for interaction with government authorities (emergency, health, environmental authorities).

Standard	Category	Requirements
		<ul style="list-style-type: none"> Provide relevant local authorities, emergency services, and the Affected Communities and other stakeholders with information on the nature and extent of environmental and human health effects that may result from routine operations and unplanned emergencies at the project facility. Information campaigns should describe appropriate behaviour and safety measures in the event of an incident, as well as actively seek views concerning risk management and Affected Community or other stakeholder preparedness.

Project Standards

The Project will meet the requirements outlined in the section 'Regulatory Framework and Reporting' as given above, national and international requirements and various Alba plans and procedures as applicable such as the HSEMS, SHE Policy and ESG Framework at all times.

PROJECT CONTEXT

Company Background

At plus-1.561 million metric tonnes per annum (2021), Alba is one of the world's largest Aluminium smelters with more than 50 years of excellence in Operations, Safety, Environment and Socio-Economic Development.

A blue-chip asset of the Kingdom of Bahrain, Alba completed five decades of commercial operations in May 2021. The Company marked its Golden Jubilee by breaking all its previous records in Safety marking 30 million Safe working-hours without Lost Time Injury (LTI) on 01 September 2022.

Alba produces high-quality Aluminium products in the form of Standard and Value-Added Products (VAP)s, which are exported to more than 240 global customers through its sales offices in Europe (Zurich), Asia (Hong Kong & Singapore) and subsidiary office in the U.S. Alba is dual listed on Bahrain Bourse and London Stock Exchange and its shareholders are Bahrain Mumtalakat Holding Company B.S.C. © (69.38%), SABIC Industrial Investments Company (SIIC) (20.62%) and General Public (10%). Alba holds globally-recognised certifications such as ISO 9001, ISO 14001, ISO 27001, ISO 45001, IATF 16949:2016, ISO 22301:2012 Business Continuity Management System (BCMS) and ASI Performance Standard Certification and Ecovadis Certification.

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 sits at the heart of a thriving Aluminium downstream sector in Bahrain, which accounts for approximately 12% of the Kingdom's GDP. As one of the biggest national companies, Alba has ensured not only the employment of Bahrain nationals (84% in 2021) but also the enhancement of their capabilities through education, training, and development initiatives at every stage of their career.

Alba is recognised as one of the top industrial companies in the world with high standards in Environment practices, Social contribution and Corporate Governance. Launched in February 2022, the Company's ESG Roadmap outlines 6 priority areas - (1) Decarbonisation, (2) Green Energy & Aluminium, (3) Circular Economy & Secondary Aluminium, (4) Employee Welfare, (5) Collaboration & Partnership and (6) Transparency, Communications & Due Diligence. Since its inception, Alba has invested into numerous environment, sustainable and socio-economic development projects that have had a positive impact on the society with the most recent initiatives being the first-of-its-kind zero-waste Spent Pot Lining Treatment Plant and the 5-7 MW Solar Farm Project, both of which are tangible efforts to meet the goals of Bahrain's Economic Vision 2030 as well as the Net Zero Carbon targets led by HRH the Crown Prince and Prime

Minister of Bahrain. Alba will also play a crucial role in the upcoming Aluminium Downstream Park, which will increase the contribution of non-oil sectors to the GDP of Bahrain.

Project Background

Alba PS 5 Block 4 Combined Cycle Power Plant is an expansion of the existing Power Station 5, which was commissioned in 2019 – 2020 and consists of 3 x CCGT Blocks of 1:1:1 configuration, with H class gas turbine technology, GE A650 steam turbine, GE (Alstom legacy) heat recovery steam generator, GE Mark VIe distribute control system. PS5 power is exported to the Alba islanded grid through a recently completed (2019) Siemens 220kV indoor gas insulated switchgear Substation.

PS5 Block 4 Project is the addition of a fourth Block of similar 1:1:1 configuration with J-class gas turbine technology and with minimum nominal ISO rating of a 680.8 MW and it also includes tie into the existing 220kV Substation.

A Consortium of Mitsubishi Power Ltd. (MPW) and SEPCO III Electric Power Construction Co. Ltd. (SEPCO III) will execute PS5 Block 4. PS5 capacity will increase from 1,800 MW to 2,481 MW. Block 4 Gas turbine unit will have the capability to operate on 100% Khuff gas, 100% Residual will also have the capability to operate on any proportionate mixture of Khuff-residual gas. Generally, concept for the new Block 4 is similar to the existing Blocks 1 to 3, and the services will be provided from the common facilities from the existing PS5 or other plants within the Alba complex.

Rationale / Needs

On completion of Pot line 6 Expansion project, Power station 1 was largely decommissioned. As of September 2020, fifteen out of nineteen Gas Turbines, originally installed, were disconnected electrically and are no longer available for generation.

Remaining four gas Turbines are connected to the network system and will remain physically available for possible future use as a black start and emergency reserve. Power Station 2 will remain in a black start and emergency reserve capacity. One of the Gas Turbine is dedicated to start the Power station 5 Gas Turbine during the blackout condition and other Gas Turbines are emergency reserve. Power Station 2 steam generator will be decommissioned and disposed of the following the power requirement review.

On completion of PS 5 Block 4 Expansion Project, the capacity of PS5 will increase from 1,800 MW to 2,481 MW. Rationale behind the expansion of PS5 Block 4 is the efficiency of this combined cycle power plant is much higher than combined cycle power plants of PS 3 and PS 4.

Power Station 3, which is operating on a low load, will be shut down and will be kept as emergency standby. Power station 4 will be running partially.

Key project information is provided below:

Project Details		
Project Name	Alba Power Station 5 – Block 4	
Location	Aluminium Bahrain B.S.C	
Type	Expansion of existing PS 5	
OEM	Mitsubishi Power Ltd	
EPC Contractor	SEPCO III Bahrain Construction Company	
Plot Size	20,000 m ²	
Number of Gas Turbines	1	
Number of Steam Turbines	1	
Number of HRSG's	1	
Number of Stacks	1 Main Stack and 1 Bypass Stack	
Capacity of CCP	681 MW	
Natural Gas Supply	117.059 mmscfd from existing natural gas supply	
Electricity Requirement	16,700 kW/h from PS 5	
Water Requirement	5,000 m ³ /month from Alba facilities	
Chemical Requirement	Ammonia	150 litres / month
	Carbo Hydrazide	100 litres / month
	Tri-Sodium Phosphate	70 litres / month
Emissions	Carbon Monoxide, Oxides of Nitrogen and Sulphur Dioxide	

Project Schedule

Construction Timeline

Anticipated construction timeline is presented in the table below:

Table 4-9 Anticipated Construction Timeline

ESIA FOR THE PROJECT

Need for ESIA Study

The Government of Bahrain introduced its first environmental legislation in 1996. Decree 21 (1996) and its amendment Decree 8 (1997), issued by the then Ministry of Housing, Municipalities and Environment, defines the environmental strategy of the country and sets the basis for future legislation. Ministerial Order No.1, regarding Environmental Evaluations of Projects 1998, is the regulatory instrument that drives the country in a sustainable way. This legislation sets the requirements for assessing the environmental status of a proposed project or expansion of an existing project and facilitates informed decision-making during the permitting process. This project falls under the obligations of the regulation.

The Environmental Impact Assessment process consists of three major phases, namely, – Environmental Screening, – Environmental Scoping – Environmental Impact Assessment. These phases follow a predefined sequence under the mandate of the Supreme Council for Environment (SCE). This project has been through the First Phase of screening subsequent to which SCE has issued guidelines dated 05th October 2020 to conduct the EIA study.

Alba has appointed Envirotech Consultancy W.L.L. to prepare an Environmental and Social Impact Assessment Study (ESIA) for the proposed Power Station 5 – Block 4 Expansion Project. It is understood that Alba will seek finance for the Project from International Finance Corporation (IFC). IFC has prepared a set of Performance Standards on Environmental and Social Sustainability and Environmental Health and Safety (EHS) guidelines with general and industry specific examples of Good International Industry Practice (GIIP).

This ESIA has also been prepared to demonstrate compliance to the environmental and social requirements of IFC Performance Standards, IFC General EHS Guidelines and IFC Sector EHS Guidelines. It should be noted that the term ESIA is used throughout this report to maintain uniformity. The ESIA includes both Environmental Impact Assessment (EIA) requirements of Supreme Council for Environment and Environmental and Social Impact Assessment Requirements of IFC.

Contents of the ESIA Study

The ESIA Study provides a factual description of the proposed project and prepared based on the relevant technique and knowledge available at the time.

The following information is included in the ESIA:

- A description of the physical characteristics of the proposed development, its location and its land-use requirements during construction and operational phases;
- An estimate of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, etc.) resulting from the operation of the Plant;
- A description of the environmental aspects likely to be significantly affected by the development, including direct and indirect effects, short, medium- and long-term effects, and cumulative effects; and the data required to identify and assess the main effects. The aspects considered will include the following: Climatic Conditions and Air Quality; Noise and Vibration; Geology, Topography, Soil and Groundwater; Socio-economic Status; Access and Vehicular Traffic; Occupational Health and Safety; and Waste Streams.
- A description of the baseline scenario;
- A description of the reasonable alternatives studied and an indication of the main reasons for the option chosen, considering the effects of the development in the environment;
- A description of the measures proposed to reduce, avoid, prevent or where possible, offset any significant adverse effects on the environment; and
- A summary of the above including the main findings of the ESIA.

Environmental Consultant

Envirotech Consultancy W.L.L has been engaged by Alba as the Environmental Consultant to carry out the ESIA studies for the proposed plant. Envirotech has technical collaborations and associations with a number of international engineering consultancy companies and environmental laboratories to provide added value to its services. Envirotech provides technical and managerial expertise for the preparation and conduct of Environmental Impact Assessments (EIAs), Risk Assessments (RAs), Environmental monitoring for air quality, water quality, soil quality and analysis, bioremediation green belt, waste management, marine and terrestrial ecological surveys etc.

Project Area of Influence

Location

The proposed Block will be set up within Alba complex. The site is located South of the existing Power Station 5. Area allocated for the Block 4 expansion is approximately 20,000 m². The site is close to the existing PS5 and allows reasonable access to the shared utilities from Alba complex. Figure 01 presents the proposed Block 4 location, boundaries along with the existing Blocks 1 to 3, access roads and shared utilities.

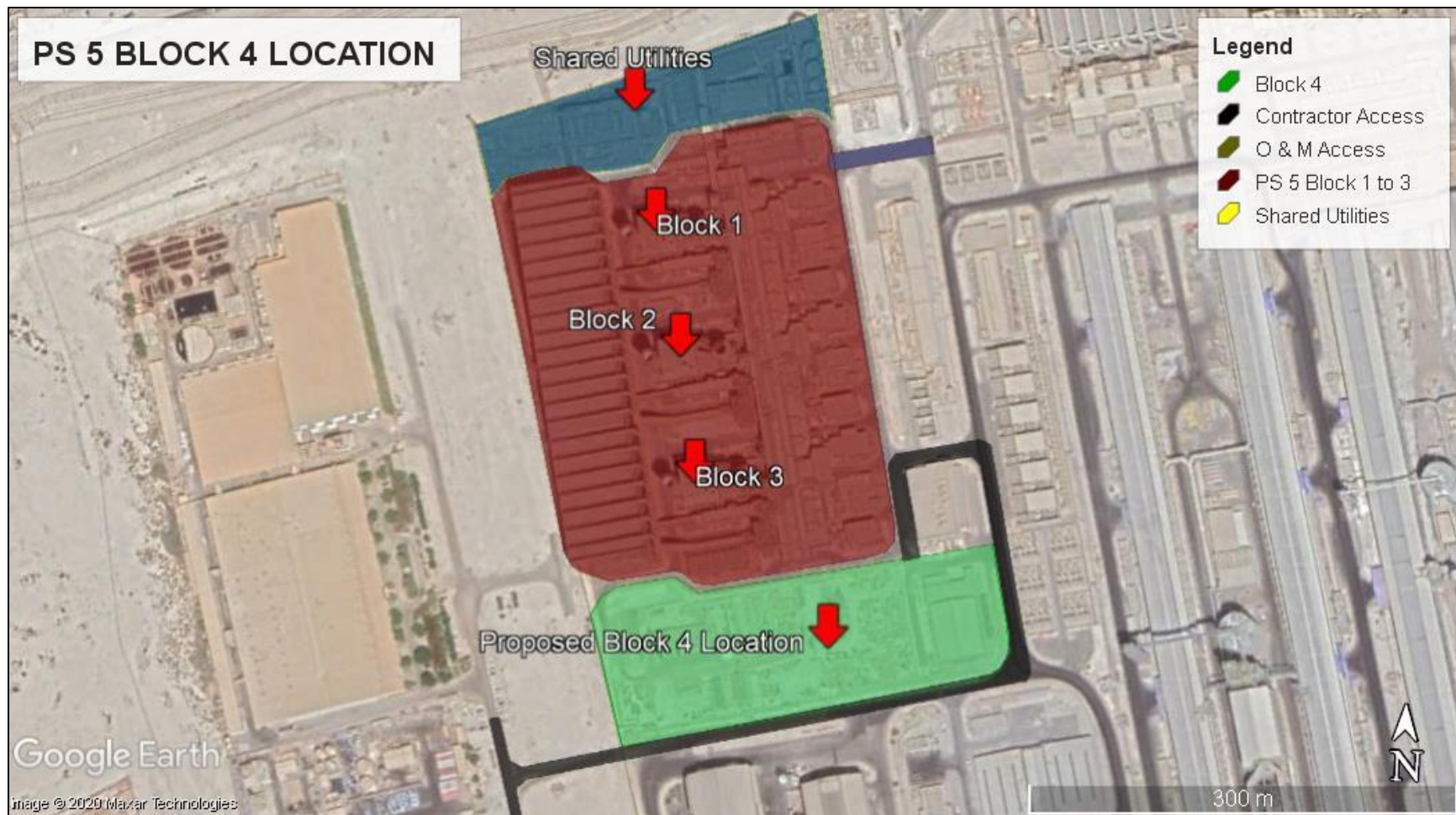


Figure 01 - Google Earth Image of the Project Location

Land Use and Sensitive Receptors

Site Conditions

At present the proposed land is used as the Power Station 5 project offices and as temporary storage yard (refer Figure 02). Demobilization of the portable cabins and the material stored at site will be completed prior to construction of Block 4.



Figure 02 – Site Photos

Land Use

In the surrounding area, Immediate neighboring facilities are as below:

- Existing Power Station 5 Blocks 1 to 3 in North;
- Alba complex in South, South East, East, and North East;

- West Point Home and Middle East Recycling Company in the West;
- Road 5146 in the West;
- Industries and commercial facilities such as Bahrain Atomisers International, Sayed Kadem Durazi lay down, Al Salam Furnitures, Middle East Fiber Glass, Ameer Industries Co. (AMGARD), Down Town Group, and Tylos Plastics are in the North, North-West, West, and South West quadrants of the 1 – Km radius of the plot;
- Labor accommodations are situated in the North and North-West quadrants of the 1 – Km radius of the plot;
- EWA Hawar substation is in the Northeast Quadrant; and
- Rest all the areas are either vacant or un-barricaded or mixed use.

Land use map indicating surrounding areas is given in Figure 03 and land use summary is presented in Table 01

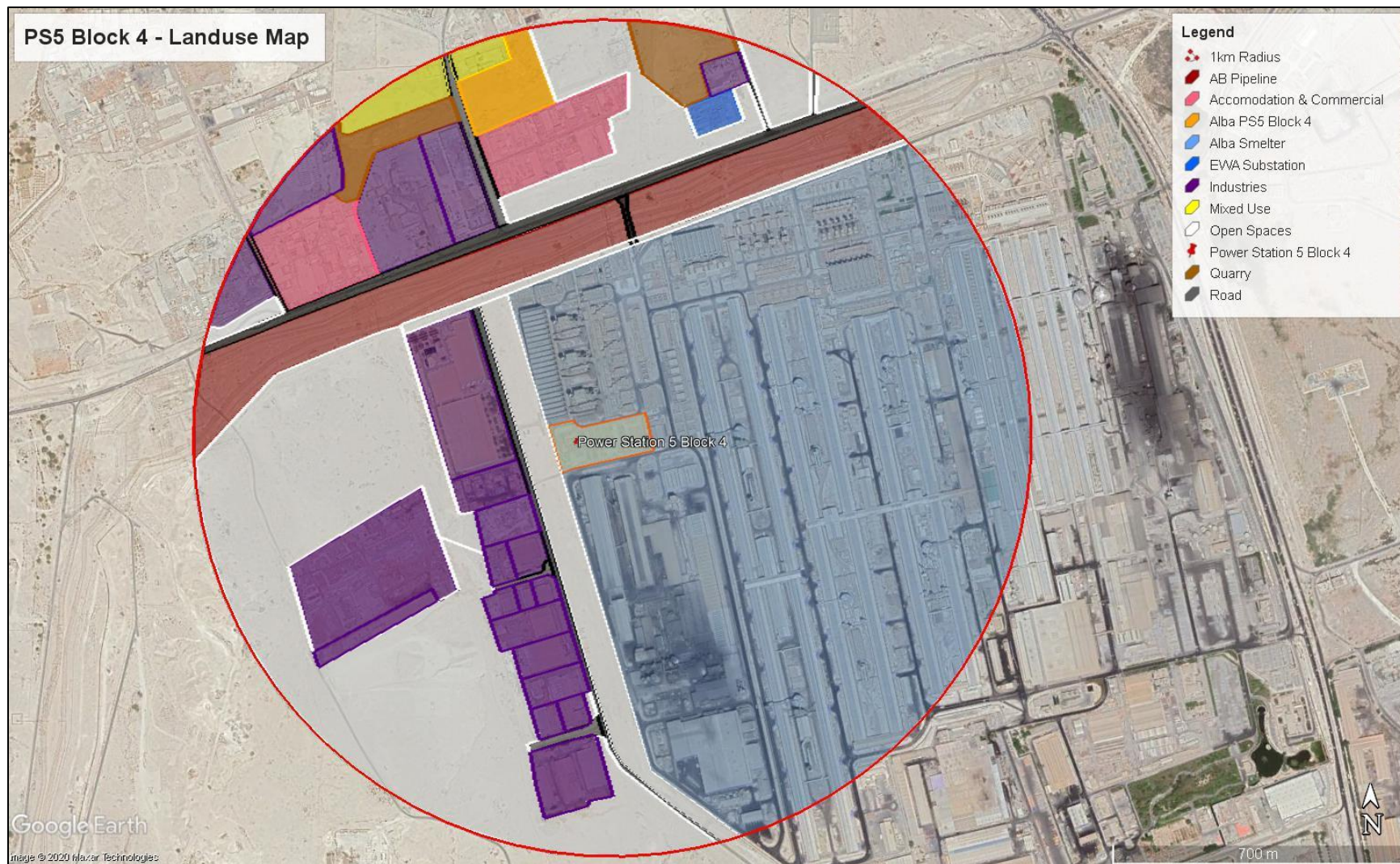


Figure 03 - Surrounding Land Use / Land Cover within 1 Kilometer Radius of the PS 5 Block 4 Project Location

SI No	Land Use	Area (Sq.m)	Percentage Cover
1	AB Pipeline	193,856	6.17
2	Accommodation & Commercial	1,392,481	44.35
3	Alba Smelter	1,392,481	44.35
4	Dump Yard	31,273	1.00
5	EWA Substation	9,591	0.31
6	Industries	423,677	13.49
7	Mixed use	29,716	0.95
8	Open spaces	800,218	25.48
9	Quarry	54,762	1.74
10	Roads	99,774	3.18

Table 01 - Land Use Summary – 1 Kilometer Radius

Sensitive Receptors

Figure 04 presents the key sensitive receptors within 5-kilometer radius of the project site particularly in terms of the air quality impacts.

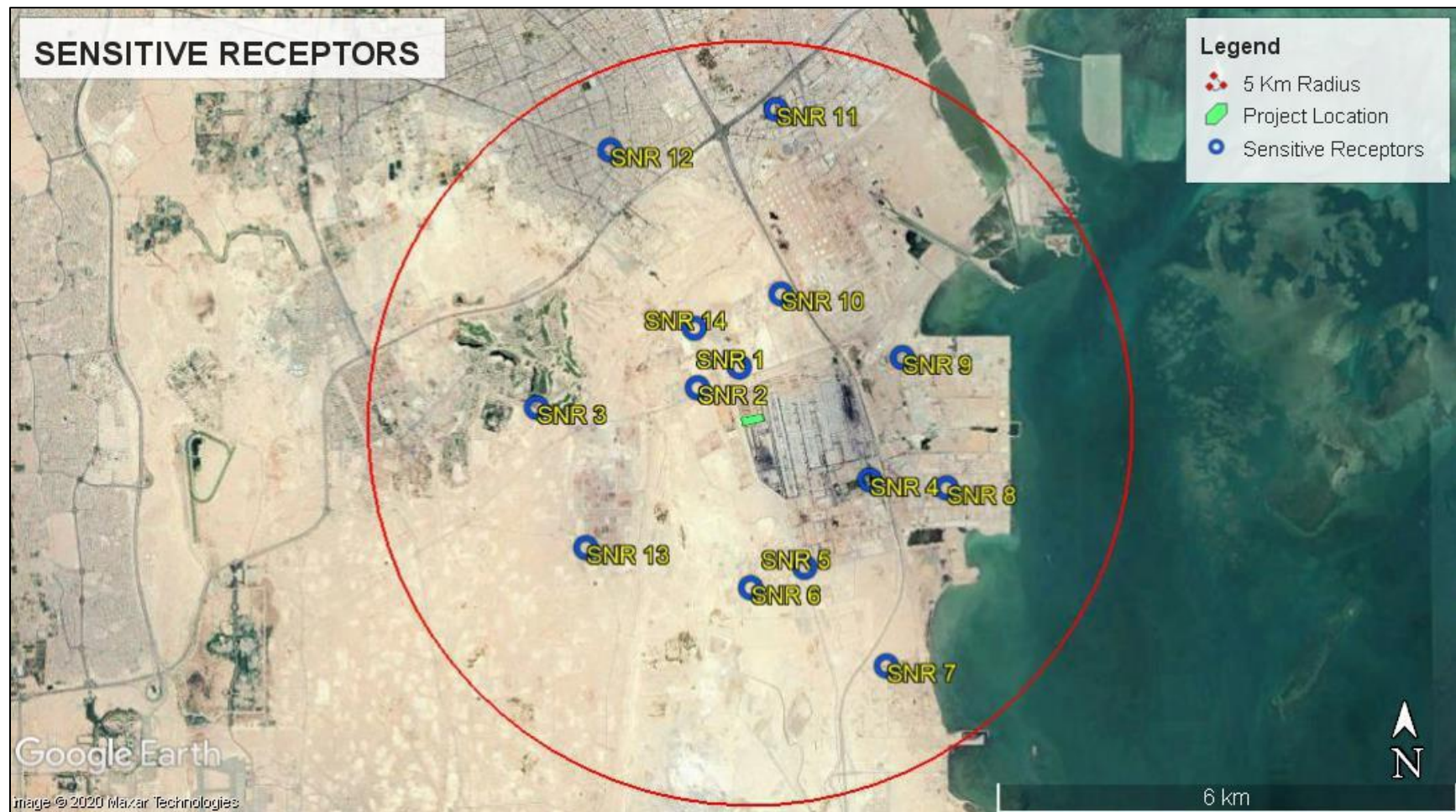


Figure 04 - Key Sensitive Receptors within 5 Kilometer Radius of the PS 5 Block 4 Project Location

A brief input of the receptors is provided below.

Receptor ID	Receptor	Type	Description
SNR 1	Camp Areas	Residential / Commercial	Accommodation camp and commercial area located at ~700 m North
SNR 2	Camp Areas	Residential / Commercial	Accommodation camp and commercial area located at ~700 m North
SNR 3	Riffa Views	Residential / Recreational	Residential area and recreational facilities located at ~2.75 Km West
SNR 4	Princess Sabeeka Oasis	Conservation	Conservational area located 1.7 Km South-East within Alba Complex
SNR 5	BSPCA	Animal Protection	Animal protection centre located 2 Km South
SNR 6	Camp Areas	Residential / Commercial	Accommodation camp and commercial area located at ~2 Km South
SNR 7	Askar Village	Residential / Commercial	Residential and commercial area located at 3.5 Km South-East
SNR 8	Camp Areas	Residential / Commercial	Accommodation camp and commercial area located at ~2.7 Km South-East
SNR 9	Camp Areas	Residential / Commercial	Accommodation camp and commercial area located at ~2.2 Km East
SNR 10	Camp Areas	Residential / Commercial	Accommodation camp and commercial area located at ~2.2 Km East
SNR 11	Mameer Village	Residential / Commercial	Residential and commercial area located at 4.2 Km North-East
SNR 12	Riffa	Residential / Commercial	Residential and commercial area located at 4.0 Km North
SNR 13	Tatweer Petroleum	Offices	Tatweer Petroleum headquarters located at 2.7 Km South-West
SNR 14	Muaskar Camp	Defence	BDF camp located at 1.4 Km North

Table 02 – Sensitive Receptors

STAKEHOLDER IDENTIFICATION

For the purposes of this plan, a stakeholder is defined as “a person who has an interest in a particular decision or activity, either as an individual or as a representative of a group. This includes people who influence a decision, or can influence it, as well as those affected by the Project.”

The stakeholders of Alba were identified based on its operations and how they will be impacted by the same.

Identification of Stakeholders

Each of the stakeholders’ groups has been outlined below. Stakeholders are likely to change in composition as the Project progresses through the stages of construction, operation and closure.

The below references will allow for a clear understanding of the stakeholders’ categories.

Terms

Impact: High (H), Medium (M) or Low (L)

Level of knowledge

U – Unaware – this group has no information about the Project;

R – Resistant – aware of Project and resistant to the changes and impacts the Project may bring;

N – Neutral – aware of the Project and neither supportive nor resistant;

S – Supportive – aware of the Project and the potential changes and impacts and is supportive; and

L – Leading – aware of the Project and actively engaged to ensure the Project’s success.

Government: Government or authorities are those agencies or bodies of the Kingdom of Bahrain who have the power to regulate or influence Alba’s operations and the Project in terms of establishing policies, granting permits or other approvals and monitoring and enforcing compliance with Bahrain Laws.

Stakeholder Category	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Government	H	H	L

Non-Governmental Organisations (NGOs): This refers to the smaller groups representing particular interests in society who may have an interest in the Alba and the Project's E&S aspects.

Stakeholder Category	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Non-Governmental Organisations (NGOs)	H	M	N/S

Private Organisations: Cluster of industrial and commercial companies including local entrepreneurs and businesses in the immediate Project area and businesses who may gain benefits by providing goods and services to Alba for the Project.

Stakeholder Category	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Private Organizations	H/M	M/L	N/S

Media: Media is a key stakeholder that plays an important role in shaping public opinion. It has a wide reach, ranging from local to national or international levels.

Stakeholder Category	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Media	H	M	S/L

Local Communities: This refers to the inhabitants of the immediate and surrounding area of the Project who may be affected by the E&S issues during and after the construction phase.

Stakeholder Category	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Local Communities	H	H	N/S

Alba Employees: Employees of Alba, permanent, temporary or contractual and the unions comprise this category.

Stakeholder Category	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Alba Employees	H	H	S/L

Alba Contractors: In very broad terms, contractors are the companies appointed or contracted by Alba to carry out various works within and outside Alba premises. This also includes the contractors and sub-contractors for the Project.

Stakeholder Category	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Alba Contractors	H	H	S/L

General Public: This category may be defined as the people and communities who are not directly impacted or impacting the Project and its activities but have an interest in the development of the Project.

Stakeholder Category	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
General Public	M	M	N/S

Vulnerable Groups: For the Project, vulnerable people are those individuals or groups within the Project's AOI who could experience adverse impacts from the activities of the Project more severely than others. This may be due to their vulnerable or disadvantaged status such as gender, ethnicity, culture, age sickness, physical or mental disability and poverty or economic disadvantage.

Stakeholder Category	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Vulnerable Groups	M	M	N/S

Matrix of Project Area of Influence against ESIA parameters

It is envisaged that impacts of the Project will be limited to the environs within 1km radial distance, during Construction as well as Operation phase. Hence, the target receptors for the project are deemed distance-bound and stakeholders located within 1km radius of the project were consulted for the ESIA study.

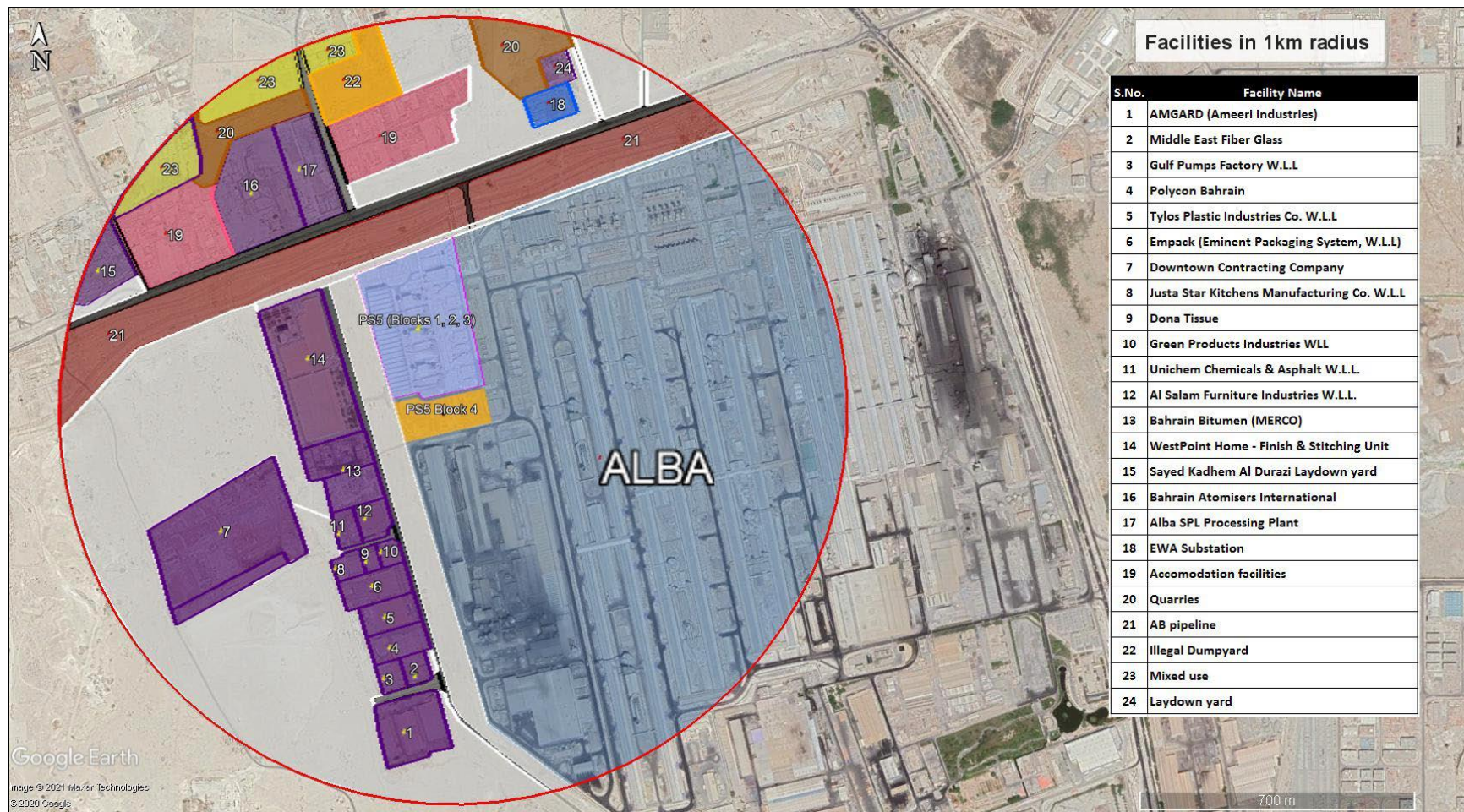


Figure 04 - Stakeholders and Facilities within 1 Kilometer Radius

Stakeholders and their interest in the Project as identified in the ESIA is given below.

Stakeholders Group	Name	Area of Interest
Government	Supreme Council for Environment (SCE)	Ambient Air Quality Water and liquid waste Biodiversity / Ecology Waste
	Agricultural Engineering and Water Resources Directorate	Groundwater Resources
	Ministry of Transport and Telecommunications	Upcoming projects in the vicinity
	Southern Area Governorate	Local Governorate
	Southern Area Municipality	Local Municipality
	Roads and Planning Projects Directorate	Traffic, Roads and ROW
Private Organizations	Name	Business and location w.r.t the Project Site
	AMGARD (Ameeri Industries)	Hot dip galvanizing for Steel materials and manufacturer of Safety Road Guard Rails, Bridge Parapets and Street Light Poles 630m South
	Middle East Fiber Glass	Manufacturer of a fiber glass especially Glass reinforced plastic (GRP) and Unplasticized polyvinyl chloride (uPVC) products

Stakeholders Group	Name	Area of Interest
		540m South
	Pumps Factory W.L.L	Designing and assembling of high technology pumps and pumping systems 530m South
	Polycon Bahrain	Manufacturer of polyethylene water tanks, road barriers and roto-molded products 465 m South
	Tylos Plastic Industries Co. W.L.L	Manufacturer of Plastic Pipes and Fittings 385m South
	Empack (Eminent Packaging System, W.L.L)	Manufacturer of plastics products using injection molding and extrusion techniques 310m South
	Downtown Contracting Company	Construction, Electrical and Mechanical contracting company 335 m Southwest
	Justa Star Kitchens	Manufacturing Co. W.L.L Manufacturer of stainless-steel kitchen equipment 310m Southwest
	Dona Tissue	Manufacturer of soft paper rolls 275m Southwest
	Green Products Industries	Manufacturer of fire-resistant

Stakeholders Group	Name	Area of Interest
	WLL	external insulation panel board products 250m Southwest
	Unichem Chemicals & Asphalt W.L.L.	Production of High-performance construction chemicals using modified Bitumen products 225m Southwest
	Salam Furniture Industries W.L.L.	Furniture manufacturers primarily in the field of carpentry, joinery, and Aluminium works 155 m Southwest
	Bahrain Bitumen (MERCO)	Petrochemicals & Bitumen manufacturing company 90 m West
	Stitching Unit	Home and fashion Textile manufacturing unit 100 m West
	Sayed Kadhém Al Durazi	Laydown yard Contractors for Infra-structure, machinery, construction, readymix and concrete 745m Northwest
	Bahrain Atomisers International	Atomised Aluminium grit and powder producers 500m Northwest

Stakeholders Group	Name	Area of Interest
Residences / localities	There are no residences within 1km radius of the project. Accommodation and Commercial facilities are located at 570 m North-west and 600 m north from the project site.	

A summary of possible influence (beneficial / non-beneficial) of the environmental parameters on these stakeholders is given in the table below based on the ESIA.

Stakeholders	Environmental Parameters							
	Air quality	Noise & vibration	Traffic	Geology & Ground water	Ecology	Health & safety	Waste	Accidental Impacts
Southern Area Governorate	X	X	√	X	X	√	√	√
Southern Area Municipality	X	X	X	X	X	√	√	√
Agriculture Engineering and Water Resources Directorate (AEWRD)	X	X	X	X	X	X	X	√
Ministry of Transport and Telecommunications (MTT)	X	X	X	X	X	X	X	√
Roads Planning and Design Directorate (RPPD)	X	X	√	X	X	X	X	√

	Environmental Parameters							
EWA Substation	X	X	X	X	X	X	X	√
Stakeholders	Air quality	Noise & Vibration	Traffic	Geology & Groundwater	Ecology	Health & Safety	Waste	Accidental Impacts
AMGARD (Ameeri Industries)	√	X	√	X	X	X	X	√
Middle East Fiber Glass	√	√	√	X	X	√	X	√
Gulf Pumps Factory W.L.L	√	X	√	X	X	√	X	√
Polycon Bahrain	√	X	√	X	X	√	X	√
Tylos Plastic Industries Co. W.L.L.	√	√	√	X	X	√	X	√
Empack (Eminent Packaging System, W.L.L.)	√	√	√	X	X	√	X	√
Downtown Contracting Company	√	X	√	X	X	√	X	√
Justa Star Kitchen Manufacturing Co. W.L.L	√	X	√	X	X	√	X	√
Dana Tissue	√	X	√	X	X	√	X	√
Green Products Industries W.L.L.	√	X	√	X	X	√	X	√
Unichem Chemical & Asphalt W.L.L.	√	X	√	X	X	√	X	√

Stakeholders	Environmental Parameters							
	Air quality	Noise & vibration	Traffic	Geology & Ground water	Ecology	Health & safety	Waste	Accidental Impacts
Al Salam Furniture Industries W.L.L.	√	X	√	X	X	√	X	√
Bahrain Bitumen (MERCO)	√	√	√	X	X	√	X	√
WestPoint Home – Finish & Stitching Unit	√	√	√	X	X	√	X	√
Sayed Kadhem Al Durazi Laydown Yard	X	X	√	X	X	X	X	√
Bahrain Atomisers International	√	X	X	X	X	X	X	√
Bahrain Society for the Prevention of Cruelty to Animals (BSPCA)	√	X	X	X	X	X	X	X
Environment Friends Society (EFS)	√	X	X	X	X	X	X	X
General Public	√	√	√	X	X	√	√	√

Stakeholder Engagement

Stakeholder Principles

- Alba will follow engagement procedures that:
- Are transparent, inclusive and culturally appropriate;
- Is a two-way communication in a language and format that is understandable to local stakeholders;
- Is conducted based on timely, relevant, understandable and accessible information; and
- Allows access to Alba's external E&S Grievance Mechanism to voice concerns and seek feedback.

Stakeholder Engagement Techniques

To engage with its various stakeholder groups, Alba will employ a variety of tools and techniques to ensure the effective and timely disclosure of information. The engagement techniques for the purpose of this plan have been identified the below table.

Engagement Techniques	Most Appropriate Application of Technique
Information Posters/Banners	Banners alongside Alba route and next to Alba)
Correspondence by phone/email/Text/Instant messaging	Invite stakeholders to meetings
Print media and radio announcements	Distribute Project information to government officials, organisations, agencies and companies
	Disseminate Project information to large audiences, and illiterate stakeholders
	Inform stakeholders about consultation meetings
Formal meetings, Online Meetings	Present project information to a group of stakeholders
	Allow the group of stakeholders to provide their views and opinions
	Build impersonal relations with high level stakeholders
	Distribute technical documents

Engagement Techniques	Most Appropriate Application of Technique
	Facilitate information dissemination using PowerPoint presentations, posters, models, videos and pamphlets or project information documents
	Record discussions, comments/questions raised and responses
Workshops	Present Project information to a group of stakeholders
	Allow the group of stakeholders to provide their views and opinions
	Use participatory exercises to facilitate group discussions, brainstorm issues, analyse information, and develop recommendations and strategies
	Recording of responses

Stakeholder Engagement till Date

In accordance with existing Bahraini practices, Alba's direct engagement with external stakeholders is largely focused on government authorities responsible for regulating the Alba operations.

Envirotech carried out extensive consultations with deemed target receptors i.e., government and non-government agencies, private establishments and community members to make them aware and appreciate the project and to secure their concerns and recommendations on the proposed project. Correspondence with the target receptors was done in the form of:

- Phone
- Email
- Formal meetings
- Online meeting portals (Zoom Cloud /Microsoft teams)

Details of communication carried out with the stakeholders for the ESIA is provided table below.

Stakeholders	Name	Details of Communication	Summary of Consultation
Government	Agriculture Engineering and Water Resources Directorate (AEWRD)	Project Details submitted on 07th December 2020 NOC Obtained	Since deep excavations are not required during the construction phase, groundwater resources are not anticipated to be impacted. AEWRD issued NOC.
	Ministry of Transport and Telecommunications (MTT)	Project Details submitted on 23rd November 2020 NOC Obtained on 03rd December 2020	The construction and operation of Block 4 does not affect the operations of MTT. MTT issues NOC.
	Roads Planning & Design Directorate (RPDD)	Project details submitted by official letter on 23rd November 2020	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
	Southern Area Governorate	Project details submitted on 15th November 2020	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
Private	Tylos Plastic Industries Co. W.L.L.	Communication for Consultation sent on 2nd December 2020 Consultation held on 7th December 2020 Communication for second Consultation sent on 28th December 2021 Second Consultation held on 04th January 2022 Minutes of meeting signed	Tylos Plastics Industries informed that that persistent brown coloured deposits are visible on their office walls, cars, trucks, and stored products. Mr. Sayed Salah explained that Alba was also a victim of the brown spot deposition and as per the instructions from the Supreme Council for Environment Alba appointed an Environmental Consultant to study the phenomenon. The scope of the study was given by the SCE to the appointed consultant. The consultant did an extensive study in the area and collected samples from different locations and analysed. A formal report was then submitted to the SCE as well as Alba. The report concludes that the depositions observed in the

Stakeholders	Name	Details of Communication	Summary of Consultation
			area are not generated from the operation of Aluminium Smelters. Mr. Sayed Salah shared a summary of the report to Stakeholders. NOC Received from Tylos.
	Empack (Eminent Packaging System, W.L.L.)	<p>Communication for Consultation sent on 2nd December 2020</p> <p>Consultation held on 13th December 2020</p> <p>Communication for second Consultation sent on 23rd December 2021</p> <p>Second Consultation held on 28th December 2021</p> <p>Minutes of meeting signed</p>	<p>Empack informed that that persistent brown coloured deposits are visible on their office walls, cars, trucks, and stored products. Mr. Sayed Salah explained that Alba was also a victim of the brown spot deposition and as per the instructions from the Supreme Council for Environment Alba appointed an Environmental Consultant to study the phenomenon. The scope of the study was given by the SCE to the appointed consultant.</p> <p>The consultant did an extensive study in the area and collected samples from different locations and analysed. A formal report was then submitted to the SCE as well as Alba. The report concludes that the depositions observed in the area are not generated from the operation of Aluminium Smelters. Mr. Sayed Salah shared a summary of the report to Stakeholders. Empack informed that occasional smoke releases during the night-time which makes their operation area unworkable, affecting badly their employees resulting eyes burning, breathing difficulty and cough because of the smoke. Mr. Sayed Salah explained that smoke is releasing from carbon plant by-pass stacks in every four (4) to six (6) months. Alba keeps Supreme Council for Environment about the bypass stack releases. Mr. Sayed Salah ensured that Alba would contact Empack to inform about future bypass stack releases as and when it happens.</p>

Stakeholders	Name	Details of Communication	Summary of Consultation
			Empack added that during the construction times of potline 6 expansion heavy vehicles parking outside the company's premises disturbing their vehicles movement. Mr. Sayed Amer ensured that the Project is small scale in comparison to potline 6 expansion Project. Thus, the traffic generation from the project will be very less. NOC received from Empack.
	Bahrain Atomisers International	Communication for Consultation sent on 15th November 2020 Consultation held on 17th November 2020 Communication for Second Consultation sent on 28th December 2021 Second Consultation held on 30th December 2021 Minutes of meeting signed	Empack informed that that persistent brown coloured deposits are visible on their office walls, cars, trucks, and stored products. Mr. Sayed Salah explained that Alba was also a victim of the brown spot deposition and as per the instructions from the Supreme Council for Environment Alba appointed an Environmental Consultant to study the phenomenon. The scope of the study was given by the SCE to the appointed consultant. The consultant did an extensive study in the area and collected samples from different locations and analysed. A formal report was then submitted to the SCE as well as Alba. The report concludes that the depositions observed in the area are not generates from the operation of Aluminium Smelters. Mr. Sayed Salah shared a summary of the report to Stakeholders. Bahrain Atomisers made an observation that noise levels were very high in the area during the initial stages of commissioning of Line 6 but gradually decreased and are now stable. NOC received from Bahrain Atomisers
	AMGARD (Ameeri Industries)	Communication for Consultation sent on 15th	Follow ups were conducted over phone. No responses received. In

Stakeholders	Name	Details of Communication	Summary of Consultation
		November 2020	person meetings were not allowed during the consultation period
	Middle East Fiber Glass	Communication for Consultation sent on 2nd December 2020 Consultation held on 7th December 2020 Waiting for signed Minutes of meeting	Middle East Fiber Glass did not respond to the requests for the signature on the minutes of meeting.
	Gulf Pumps Factory W.L.L.	Communication for Consultation sent on 15th November 2020.	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
	Polycon Bahrain	Communication for Consultation sent on 15th November and 2nd December 2020.	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
	Downtown Contracting Company	Communication for Consultation sent on 15th November 2020.	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
	Justa Star Kitchens Manufacturing Co. W.L.L.	Communication for Consultation sent on 15th November 2020	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
	Dona Tissue	Communication for Consultation sent on 15th November 2020.	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
	Green Products Industries WLL	Communication for Consultation sent on 15th November 2020.	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
	Unichem Chemicals & Asphalt W.L.L.	Communication for Consultation sent on 15th November and 2nd December, 2020	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period

Stakeholders	Name	Details of Communication	Summary of Consultation
	Al Salam Furniture Industries W.L.L.	Communication for Consultation sent on 15th November 2020.	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
	Bahrain Bitumen (MERC0)	Communication for Consultation sent on 15th November 2020.	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
	Sayed Kadhem Al Durazi Laydown yard	Sayed Kadhem Al Durazi Laydown yard	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
Non-Government Organisations	Bahrain Society for the Prevention of Cruelty to Animals (BSPCA)	Communication for Consultation sent on 15th November 2020	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period
	Bahrain Environment Society	Communication for Consultation sent on 15th November 2020.	Follow ups were conducted over phone. No responses received. In person meetings were not allowed during the consultation period

Publication of the ESIA

The ESIA Report has been published on the Alba Website. An Addendum to the ESIA Report is underway and will be published once completed and approved. Based on the Addendum, the stakeholder categories and identification is likely to change along with the engagement techniques to engage with the.

The approved Addendum will also be available on Alba website.

Public Disclosure of Information to Date

Information on the Project has been disseminated to various news agencies and newswires including the Kingdom of Bahrain's local newspapers, in a timely manner by Alba's IR Department through Press Releases and Alba's official social media channels -- Instagram, Twitter, LinkedIn, Facebook, and Flickr. All information is bi-lingual (English and Arabic).

The below table gives the timeline of the Project Press Releases that have been issued with regards to the Project.

No	Press Release	Dates
1	Alba Holds Board Meeting for Fourth Quarter 2021	01/12/2021
2	Alba Signs Mitsubishi SEPCOIII as EPC contractor for Block 4 in Power Station 5	16/05/2022
3	Alba's Chairman of Board of Directors Debuts First Concrete Pour for PS5 Block 4 Project	26/09/2022
4	Mitsubishi Power Awarded Alba LTSA 20220509	03/10/2022

Alba Sustainability Report

The Alba Sustainability Report 2021 was compiled based upon the expectations/views of the stakeholders with regards to Environment, Social and Governance (ESG) interests. The material topics, which have been identified, are based on peer reviews (desktop research) in public domains, Bahrain's Economic Vision 2030, disclosure by clients and vendors. The topics were aligned with national and international standards. As part of the assessment, a list of 15 material topics have been identified to develop the Materiality Matrix.

Environment	Social	Governance
1. Climate Change 2. Water and Wastewater Management 3. Recycling & Waste Management 4. Energy Management 5. Biodiversity	6. Human Rights 7. Our People (Social/Employee Welfare, Cultural Diversity and Equal Opportunity) 8. Local Community Engagement 9. Health and Safety 10. Technology and Operational Excellence 11. Our Product (Metal Marketing & Product Labelling)	12. Corporate Governance 13. Economic Results 14. Compliance with Statutory and Regulatory Requirements and Anti-Corruption 15. Sustainable Supply Chain and Responsible Sourcing

Monitoring of the Project SEP

The concerned departments involved in the Project will maintain a Stakeholder Engagement Register (SER), the ownership of which lies with the IR Department.

External Grievance Mechanism

Introduction

The Performance Standards of IFC, a World Bank affiliated lending organisation, representing most of the countries in the world, require Alba to have an external Grievance Mechanism in place. An external Grievance Mechanism is a process designed to receive and facilitate the resolution of affected communities' concerns and grievances about Alba's Environment and Social (E&S) performance.

The general purpose of this document is to outline the formal procedure of Alba's External Grievance Mechanism to manage E&S grievances for Line 6 Expansion Project, hereafter known as the Project.

Requirements

The key requirements of a Grievance Mechanism as per the IFC Performance Standards is highlighted in the below table.

Grievance Mechanism related to IFC Performance Standards

Principle	Key Components
Performance Standard 1 Social and Environmental Assessment and Management	"The client will establish a Grievance Mechanism to receive and facilitate resolution of the affected stakeholders' concerns and grievances about the client's environmental and social performance".
Performance Standard 4 Community Health, Safety and Security	"A Grievance Mechanism should allow the affected community to express concerns about the Community Health, Safety and Security".

Definition

A grievance is defined as a concern or complaint raised by a member of the communities affected by Alba's E&S performance. Grievances may take the form of specific complaints for actual damages or injury, general concerns about the Project's E&S activities, incidents and (perceived) impacts.

Under Alba's External Grievance Mechanism, a grievance is not:

- A question or suggestion to the Company;
- A question or suggestion to the Company on the Project;

- An appeal or request for assistance;
- A (medical) emergency;
- A safety or security accident;
- A complaint from an Alba (or contractor) worker about labour and working conditions; and
- A concern about unethical behaviour/breach of Code of Conduct of Alba employees.

Principles

The key non-judicial principles of Alba's External Grievance Mechanism are:

- Fair: It has an independent governance structure to ensure that no party can interfere with the fair conduct of that process.
- Accessible: It is publicised to all and provides adequate assistance for aggrieved parties who may face barriers of language, literacy, awareness, distance or fear of reprisal.
- Transparent: It is a clear and transparent procedure with a timeframe for each stage.
- Records: All E&S grievances will be registered by Alba and tracked through to resolution.

Confidentiality

The personal details of Complainants will be made available to those involved in the resolution of the grievance in question and will follow policies related to protecting personal data when handling the grievance.

Alba will accept, log and seek to address grievances contained in anonymous grievance forms, but due to the anonymous source of the grievance, will not be able to respond directly to the Complainant.

Scope

The External Grievance Mechanism can be used by all (members of) communities affected by Alba's E&S performance and applies to all stakeholders of Alba.

This section outlines the roles and responsibilities of relevant Alba departments and contractors in facilitating and resolving all grievances.

This procedure does not cover employee and worker grievances who must refer to Alba's internal, worker grievance procedures as prescribed by the Human Resources Department of Alba. The Procedure does not replace the public mechanisms of complaint and conflict resolution as per the Kingdom of Bahrain's Legal system but attempts to minimise the usage of them.

Alba Integrity Line: External Grievance Reporting Channel

External grievances about Alba's E&S performance can be logged via the Alba Integrity Line. The Alba Integrity Line is an independently operated confidential reporting hotline that works in multiple languages via a toll-free phone system or via the intranet 24 hours a day, every day.

The Alba Integrity Line was originally used for complaints solely related to potential breaches of Alba's Code of Conduct such as financial irregularities, fraud, bribery, corruption, conflicts of interest or any other similar matters of concern. Alba has now extended the scope of the Integrity Line to include complaints about E&S matters.

A complainant can use Alba Integrity Line by calling 800-000-00, then at the prompt dial 888-265-3470 (toll-free) and speak to an officer. Alternatively, the complainant can log on to www.albasmelter.com, visit the page on Code of Conduct.

The Complainant/s must enter the details of the complaint/grievance through Alba Integrity Line within a maximum of 48 hours of the complaint/grievance taking place.

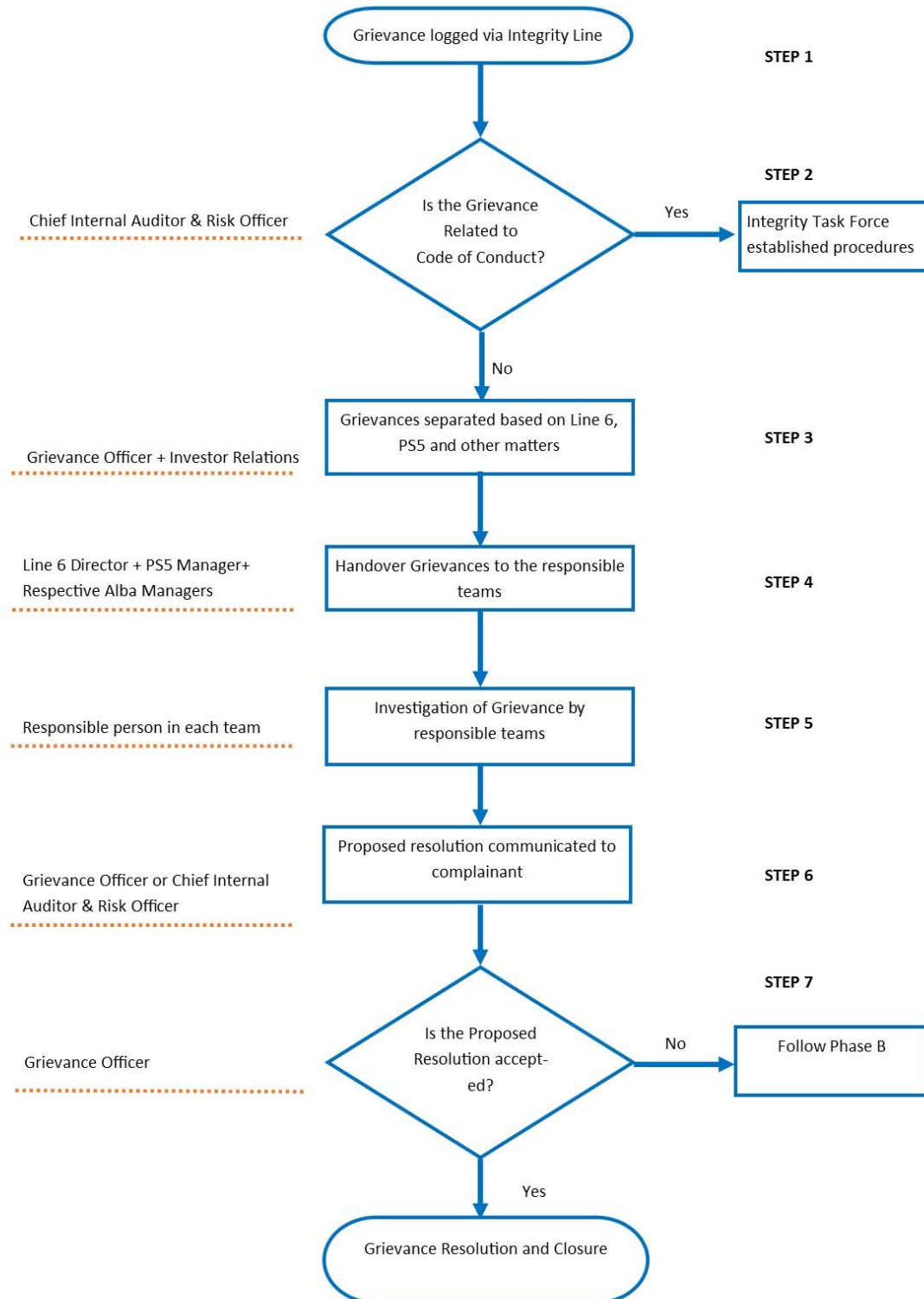
To facilitate tracking, evaluation and response to grievances, standardised information will be collected and recorded on the Alba External Grievance Mechanism Logging Form. As a best practice, the complainant/s should always carry this Form if they are attending any meeting with Alba parties or during resolution process of the grievance.

Alba's assigned GO will be always the point of contact during the grievance and resolution process. Please note that grievances related to E&S performance and complaints about potential breaches of the Alba Code of Conduct are handled as two separate matters on the Alba Integrity Line.

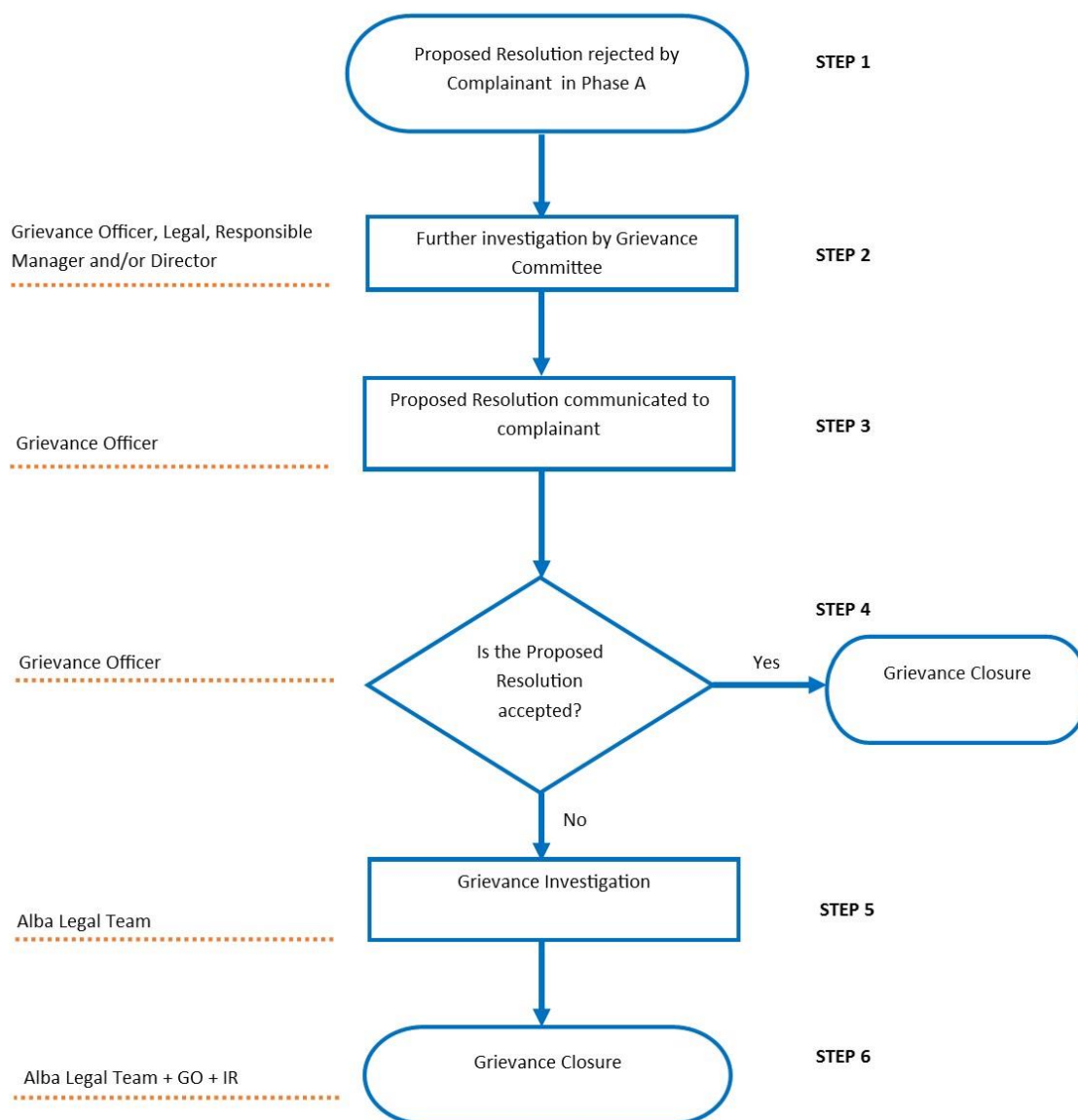
Process Flow of External GM

The process flow of the External Grievance Mechanism is explained below in the Alba External Grievance Mechanism Flowchart.

External Grievance Mechanism for Environment & Social Issues—Phase A



External Grievance Mechanism for Environment & Social Issues—Phase B



Monitoring of the Grievance Mechanism

Alba will monitor its External Grievance Mechanism through appropriate measures/Key Performance Indicators (KPIs) based upon quarterly, bi-annual and annual reporting of the grievances to ensure that disclosure efforts are effective.

The table below summarises the KPIs that can be used to assess the progress and effectiveness of the proposed mitigation strategies.

No	KPIs	Target	Monitoring Measure
1	Number of complaints or grievances received	Total number reduced year-on-year	Grievance Register
2	Number and % of grievances acknowledged within the given timeframe 07 working days.	Target of 90%	Grievance Register
3	Number of complaints or grievances resolved within the 30 days.	Target of 90%	Grievance Register
4	Reporting back to stakeholders on implementation of the Grievance Procedure	Periodic reports to stakeholders	Reporting

In the event that the monitoring identifies non-conformance with the Project Standards, these will be investigated, and appropriate corrective actions will be identified.

Glossary

Stakeholder Engagement Plan	SEP
Environment & Social	E&S
Health, Safety and Environment Management Systems	HSEMS
International Finance Corporation	IFC
Performance Standard	PS
Equator Principles	EP
Request for Changes	RFC
Investor Relations	IR
Emergency Preparedness Response Plan	EPRP
Safety, Health, and Environment	SHE
Environment, Social & Governance	ESG
Human Resources	HR
Environment and Social Impact Assessment	ESIA
Investor Relations	IR
Key Performance Indicators	KPI