

ALUMINIUM BAHRAIN B.S.C. STAKEHOLDER ENGAGEMENT PLAN

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1 INTRODUCTION

1.1 Document Name and Number

The Aluminium Bahrain B.S.C. (Alba) Stakeholder Engagement Plan (Alba SEP_ PLN_V002) is a formal document of Alba, also referred to as the Company or Smelter, detailing its Stakeholder Engagement for the whole of its business operations.

Alba SEP_ PLN_V002 is the revised version following an update to the Environment and Social (E&S) impacts identified and mitigation controls to the operations of the smelter.

1.2 Purpose and Objectives

This SEP aims to outline the Company's communication with its stakeholders and the community, which may be affected by, or interested in, Alba's operations as well as 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 public to raise any concerns 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;
- Provide a baseline and reference for a Project-related SEP as and when required;
- Summarise Alba's stakeholders;
- Summarise the disclosure and dissemination of information to stakeholders;
- 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;
- Provide information on Alba's formal External E&S Grievance Mechanism for stakeholders and public to raise any concerns, as well as provide feedback and comments about Alba.

1.3 Scope

The scope of this Document is outlined as below:

- Covers all of Alba’s operations;
- Is part of Alba Management Plans;
- Has overlaps and links to a number of other Management plans such as Health, Safety and Environmental Management System (HSEMS), Emergency Preparedness and Response Plan (EPRP), Corporate Communications Plan, Safety & Health (S&H) 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.

1.4 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.

1.5 Resources and Responsibilities

Principle roles and responsibilities for the implementation of this SEP are outlined in the below Table 1.1:

| Entity | Responsibilities |
|--------|---|
| IR | <ul style="list-style-type: none"> • Owner and accountable for the SEP, as well as any Project-related SEP; • Develop and implement a Project-related SEP in compliance with IFC and EP requirements and other international obligations, as and when required; • Assign a resource to manage the SEP and the External E&S Grievance Mechanism to: <ul style="list-style-type: none"> • Liaise with concerned departments including S&H and Environment, Social and Governance (ESG) to oversee the implementation of plans related to this SEP; |

| Entity | Responsibilities |
|---------------------------------|---|
| | <ul style="list-style-type: none"> • Perform monitoring and evaluation to track the progress of the SEP and the External E&S Grievance Mechanism; • For any Project, current and future, liaise with the 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; • Provide for disclosure of any Project-related ESIA disclosure • Draft and publish annual Sustainability Report; • Draft and publish the Annual Report; and • Coordinate regulatory/government reporting when required. |
| <p>Other Departments</p> | <ul style="list-style-type: none"> • Coordinate with various government authorities as required; • Implementation and compliance with Alba’s HSEMS by Alba and contractor workforce; • Meet the required standards through the ESG Framework, S&H Policy, Alba Code of Practices (ACOPs), Statement of Purpose (SOP), Job Safe Practices (JSPs) etc.; and • Accountable for meeting any requirements as requested by the Lenders Group. |
| <p>Contractors</p> | <ul style="list-style-type: none"> • Implement Alba’s HSEMS, SOPs, ACOPs, JSPs, etc.; • Prepare and deliver periodic or, as required, reports as required by different departments; • Communicate Alba’s External E&S 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. |

Table 1.1 - SEP Roles and Responsibilities

1.6 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, Calciner 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) is 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 S&H, 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 organisation's Corporate Social Responsibility, 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:

Alba emergencies that occur outside the organisation'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 and Emergency Response and Operations Centre 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 organisation's emergency preparedness and response for Alba operations - 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 as the 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 and Health (S&H) Policy

Alba Executives and Senior Management are fully committed to continually improve Safety and Health in and around Alba, as well as of its stakeholders. Alba's S&H policy is a commitment to all its stakeholders to comply with workplace S&H 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 such as the Operation Readiness and Implementation Strategy Plan, Risk Assessment and Hazard, etc.

2 REGULATORY FRAMEWORK AND REPORTING

2.1 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, S&H Policy, ESG Framework, etc.

2.2 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.

2.3 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 1.2.

| 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. |

| Standard | Category | Requirements |
|---------------------|------------------------|--|
| | | <ul style="list-style-type: none"> • 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. • 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 |
|-----------------------------------|----------------------------|--|
| | | <p>process, in any event before the project construction commences, and on an ongoing basis.</p> |
| <p>IFC Performance Standard 1</p> | <p>Grievance Mechanism</p> | <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 during the stakeholder engagement process. |
| <p>IFC Performance Standard 4</p> | <p>Grievance Mechanism</p> | <ul style="list-style-type: none"> • A grievance mechanism should allow the affected community to express concerns about the Community Health, Safety and Security. |
| <p>Equator Principle 6</p> | <p>Grievance Mechanism</p> | <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. • Affected Communities should be informed about the mechanism in the course of the stakeholder engagement process. |

| Standard | Category | Requirements |
|----------------------------------|-------------------------------------|--|
| 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). • 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, |

| Standard | Category | Requirements |
|----------|----------|---|
| | | as well as actively seek views concerning risk management and Affected Community or other stakeholder preparedness. |

Table 1.2 - IFC PS and EP- IV standards for Alba's Stakeholder Engagement

3 ABOUT ALBA

3.1 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.

3.2 Facts & Figures

Table 1.3 below provides a snapshot of Alba's Facts and Figures and Images.

| Topic | Area |
|--|---|
| Area of Main Site | 2,546,031 sq.m |
| Area of Calciner | 246,498 sq.m |
| Number of Potlines | 6 |
| Start-up of Potline 1 | 1971 |
| Start-up of Potline 2 | 1971 |
| Start-up of Potline 3 | 1981 |
| Start-up of Potline 4 | 1992 |
| Start-up of Potline 5 | 2008 |
| Start-up of Potline 6 | 2018 |
| Number of Employees | 3,135 (as of 2021) |
| Type of Products | Extrusion Billet; Foundry Alloys; Rolling Slabs; Standard Ingot; Liquid Metal |
| Number of Power Plants | 5* with total Capacity: 3,665 MW ISO * 1 & 2 are no longer in use |
| Other Products (Refer to Alba's Audited Financial Statement 2021) | Green Petroleum Coke; Calcined Petroleum Coke; Desalinated Water |

Table 1.3 – Alba Facts and Figures



Figure 1 - Alba Ariel View of Reduction Lines 1 – 6, Casthouse and other facilities



Figure 2 – Ariel View of Reduction Line 6



Figure 3 - Ariel view of Power Station 5



Figure 4 - Ariel view of Calciner and Marine

4 STAKEHOLDER IDENTIFICATION AND ENGAGEMENT

4.1 Introduction

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.

4.2 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.

4.3 Stakeholder Identification

Alba Smelter is located at the junction of King Hamad Highway and Highway 96 close to the east coast of Bahrain. As well as the main smelter site, Alba facilities include importation and processing facilities at its marine terminal in Sitra.

Alba’s stakeholder categories have been identified based on the National Detailed Land Use (NDLU) Plan, the Project Area of Influence (PAOI) as identified in the ESIA and Supplementary ESIA for various projects and the Company’s E&S risks identified.

Alba’s stakeholder categories may change based upon: if a new project is undertaken; and/or if any new E&S impact(s) are identified.

4.4 Factors for Stakeholder Identification

National Detailed Land Use

In line with Bahrain 2030 National Planning and Development Strategy (NPDS), the General Directorate for Urban Planning (GDUP) has produced the National Detailed Land Use (NDLU). The NDLU map aims to have a coordinated and effective use of available land resources in the country. Comprehensive land use planning has also been included as one of the priority objectives in the shorter-term (4-year) National Development Strategy (2015-2018).

E&S Impacts

Alba is located within an industrial area of the Southern Governorate of Bahrain, which is one of the four governorates (Capital, Northern, Southern and Muharraq). Much of the Southern Governorate is open space and undeveloped land but there are also significant areas of industrialization, suburb development, educational and leisure facilities.

In addition to Alba, there are a number of important industrial sites within the Southern Governorate including Bapco, GPIC, Banagas (natural gas purification and processing), Al Dur (integrated desalination and power plant), Al Mazara'a Industrial Park and the Bahrain oil and gas field. To the north of Alba, there are industrial facilities and labour accommodation blocks, to the east is the Bapco Refinery including the BMP, to the south is the Al Mazara'a Industrial Park, which contains a wide variety of industry, and to the west there are light industrial facilities.

In relation to Alba's operations, Alba's Internal Audit and Risk Management team have identified the major risks as well as mitigation measures implemented by Alba (Table 1.4) to minimize or nullify the impact of the said risks.

| Areas | Details | Risks | Controls |
|---|--|--|---|
| Environment & Sustainability | Environmental pollution to the air, water or land, non-compliance with regulations, or wastage of natural resources, resulting in future environmental liabilities, financial loss, regulatory penalties or reputational damage. | Risk of exceeding Bahrain's statutory limits on air emissions and the discharge of liquids and other substances | Implementing ISO 14001:2015 - Environmental management systems Supporting Policies, SOPs, Procedures, etc. reporting & monitoring |
| | | Risk of Spillage of Raw materials - Alumina, Calcined Coke, Liquid Pitch, Aluminium fluoride | Policies, SOPs, Procedures, etc. |
| | | Hazardous Waste Management - a. SPL b. Other Waste | a. SPL Processing Facility: processing of SPL and converting it into additives for Cement b. Waste management to be done by consultant in Q3 2023 - Salt cake generated from Alba Dross processing is a low risk since the SCE had agreed with Aluserve on a plan to treat this pile |
| | | By-passe by fume treatment plant (e.g., fluoride and SOx), due to maintenance activities or breakdowns | Implementing ISO 14001:2015 - Environmental management systems, reporting & monitoring |
| | | High consumption of water during cooling of casted metal | An alternative way for the outfall line has been constructed. The outfall has been extended as an effect of the reclamation and is fully operational |
| | | Challenges with some of the solid waste streams generated such as carbon dust, cast iron slag, cast house sludge, and solid bath | Solid waste is disposed of, in coordination with the environmental authority |

| Areas | Details | Risks | Controls |
|--------------------------|---|---|---|
| | | <p>Greenhouse Gas Emissions: Carbon emissions are generated directly from the production process and indirectly from the electric energy</p> <p>Greenhouse Gas Emissions: changing market preferences</p> | <p>Alba signed MOU with the SEA (Sustainable Energy Authority) to implement various sustainable energy initiatives of common interest. - 5-6 MW Pilot Solar project utilizing the car parking area</p> <p>Sustainability Strategy and Road Map</p> |
| Industrial Action | <p>Actual or perceived unethical or fraudulent acts, Bribery and corruption, lack of transparency over transactions, conflict of Interest, exchange of gifts, collusion with & customers due to weaknesses in the Company's governance, leadership, ethical culture, and key internal controls, causing reputation damage and financial losses.</p> | <ul style="list-style-type: none"> • Production impact due to industrial actions, such as strike • Health issues, such as exposed to gases and fumes which may harm the employees. • Increase in occupational diseases or employment injuries • Reduction in Workers rights • Discrimination between Employees based on (gender, nationality, ethnic origin, etc.) | <ul style="list-style-type: none"> • Skill Matrix implemented to provide employees with clear line of development • Increased formal dialogue with the Union. • Involvement of workers and secure their active support in negotiating preventive actions • Grievance system, where the employees can raise any HR issue, and a grievance committee will be formed to resolve it. • Prevention is refocused on eliminating risks at source through ongoing improvement of working conditions based on all workers' needs, however visible or invisible to compensation systems and job types. |

| Areas | Details | Risks | Controls |
|--|---|--|---|
| | | | <ul style="list-style-type: none"> Alba Emergency Response/ Disaster Recovery (DR) Plan, whereby resources are prioritized and coordinated to enable continued basic plant operations for a limited period, during emergency situations such as strike. |
| Corporate Governance & Ethics | <p>Actual or perceived unethical or fraudulent acts, Bribery and corruption, lack of transparency over transactions, conflict of Interest, exchange of gifts, collusion with & customers due to weaknesses in the Company's governance, leadership, ethical culture, and key internal controls, causing reputation damage and financial losses.</p> | <p>Failure to comply may result in reputational damage, regulatory penalties, and lowered credibility in the eyes of investors & Customers, vendors and other Stakeholders</p> | <ul style="list-style-type: none"> Corporate Governance Guidelines approved by Board and published on Alba website Corporate Governance report prepared annually setting out the parameters for required disclosure Board approved Code of Conduct setting out expectations regarding Insider Trading, Confidential Information, Contact with the Media, and Respect for the Law Establishment of an Integrity Program managed by an Integrity Task Force (ITF). Requirement to comply with the Code of Conduct included in terms & conditions of new recruits' contracts. Establishment of an independently run 24/365 confidential reporting hot line (Integrity line) |

| Areas | Details | Risks | Controls |
|-------|---------|-------|---|
| | | | <ul style="list-style-type: none"> • Extensive awareness and training on Code of Conduct • External Auditor appointed to perform quarterly review • Continuously reviewed procedures along with monitoring of procurement of major raw material costs, and major contracts through the establishment of tender board, and tender policy, Direct - Materials Sourcing policy, and Levels of Authority • Detailed procedures in relevant and appropriate departmental Standard operating procedures. • Internal audits, covering all departments and major processes • Insurance policy covering directors and officers (including down to Managers). |

Table 1.4 – Alba’s key E&S risks

Project Area of Influence

Alba has undertaken some key expansion projects in the recent years such as the Line 6 Expansion Project, Port Upgrade Project and the Power Station 5 Block 4 Expansion Project. Each of these projects define key E&S impacts, as defined in their respective ESIA's, which are based on the respective Project Area of Influence (PAOI).

Line 6 Expansion Project

The Project was located within an area designated as priority industry in the Bahrain 2030 National Plan. The land use surrounding Alba is partly built-up and composed of heavy and light industrial sites namely, Bapco Refinery, South Alba Industrial Estate, Ras Zuwaid Industrial Area, Askar and Hafeera landfill sites and quarries and the Bahrain (Awali) Oil Field.

Existing Land Use Line 6 and PS 5: The existing land use was based on information gathered from mapping that was supported with online Google Earth, local cadastral maps, and the Geographic Information System (GIS) database as given in the Supplementary ESIA.

Majority of land within a 5 km radius of Alba was and is mainly utilised for oil & gas (O&G) and various industrial services. Large tracts of open spaces still exist, but these have been earmarked for specific purposes under the National Land Use Plan.

The surveyed radius extends westwards from Alba over the coastal strip into the sea from the Ras Zuwaid Industrial Area (which is mainly occupied by labour accommodation and light industry) down to the villages of Askar and Jaww. Much of the coastal strip is altered by reclamation development for industrial use and public utilities. Ras Abu Jarjoor Desalination Plant, Askar Fishing Jetty, and Bahrain National Mariculture are located in this area. The Desalination Plant uses groundwater as opposed to seawater.

The area adjacent to the north of Line 6 and Power Station sites is largely an open area but has had encroaching development over recent years. This development has included a variety of light industrial and commercial establishments. A labour accommodation block, a substation and gas dehydration units have been constructed within this area. Some O&G pipelines cross the area towards the direction of Bapco Refinery. The new A/B pipeline (Bapco) will run alongside these pipelines. Further to the north is a military base located beside the existing Riffa Power Station at Moaskar.

Bapco's Refinery lies further to the north of the open land. Bapco has permission to update and expand the Refinery; a project known as the Bapco Modernization Programme (BMP). The main elements of the BMP will be located to the south and east of the existing process units and will utilise the 'pitch ponds' site which is an area historically used to dump pitch from the refining process in the southwest corner of the Bapco Refinery. The BMP will also require changes and development of Sitra Tank Farm, Sitra Wharf and the transfer pipelines between the Refinery and the Sitra facilities. Bapco abstracts groundwater from four boreholes within the Refinery.

The nearest villages to the northwest are Awali and Riffa Views, whilst East Riffa, Nuwaidrat and Maameer village are situated to the north and northeast respectively. Average distance of these villages is about 3 km from the proposed power station site of the Project.

Construction Laydown Area (CLA): Askar village is the closest residential area to the CLA, located about 300 m to the southeast. Askar community has a public jetty and a newly developed recreational facility / public park with beach frontage. To the south of Askar village is an on-going residential development known as the Southern New Town. To the west of the CLA, lie the quarries and landfill sites of Askar and Hafira. Further west is the Awali Oil Field. Some privately owned animal farms were identified in the Oil Field during the land use survey, the location of which are provided in Figure 2.1 below.

Sitra Wharf: Alba's facilities on Sitra Wharf are located approximately 10 km from the Potline 6 site boundary and is shared between Alba, Bapco and Banagas. There are pipelines along the wharf, which transfer products from Bapco's Sitra Tank Farm to the Wharf for export. The Tank Farm is located approximately 4.5 km west of the Wharf. As part of their Central Gas Plant-III project, Banagas plans to expand its storage facilities on the Wharf.

To the north of Sitra Wharf a new terminal is planned to be constructed. This project is being led by NOGA, who already has planning permission to reclaim the site from the sea and this work is underway. Adjacent to the new terminal, reclamation is ongoing for a new town known as the East Sitra Housing Development. This Project is being led by the Ministry of Housing. Beyond the new town lies the residential area of Sitra which is a mixture of residential, commercial and industrial land uses, and within Sitra, there are two schools.

To the southwest of the Wharf there is a further reclamation ongoing which is believed to be for industrial use, in accordance with the Bahrain 2030 National Plan. Adjacent to the southwest is the popular tourist resort of Al Dar Island. Approximately 3.5 km to 4 km to the north lies the Arab Shipbuilding and Repair Yard (ASRY) and the SULB and Bahrain Steel plants.

Port Upgrade Project

The Port's PAOI was described based on a land use survey undertaken within a 7 km radius of the project site. The Port is largely marine-based, with limited topside construction. The selected 7 km radius takes into account both marine and terrestrial-based receptors and is considered to be the maximum AOI for significant impacts. However, the Bahrain Approach Channel, which extends for many kilometers outside the AOI, has been included for completeness because more shipping vessels will be entering Bahrain waters as part of the Port.

Within the 7 km radius AOI, a range of land use types have been mapped and sensitive receptors highlighted. The land use has been derived based on information gathered from field surveys conducted by EACS and a review of Google Earth, local cadastral maps, and the Geographic Information System (GIS) database held by EACS.

Power Station 5 Block 4 Expansion Project

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. The laydown area utilized for the storage of construction equipment and vehicles used in the construction of the Project are stored in Al Dur, 0.8 km off the southeast coast of Bahrain adjacent to the SEPCO III Labour accommodation.

4.5 Stakeholder Engagement and Implementation Table

Since Alba is situated in an industrial area, no specific E&S impacts have been identified. The E&S impacts identified thus far have been generic and specific to the projects -- Line 6 Expansion Project, Port Upgrade Capacity Project, and Power Station 5 Block 4 Expansion Project. Each of these projects have their individual ESIA's and related supplementary reports as well as SEPs, all of which give in-depth information about the E&S impacts as well as the mitigation measures of the respective Project and how Alba has and will communicate with the identified stakeholders.

Alba has detailed its engagement approach with the different categories of stakeholders of its overall business based on the above-mentioned factors and in accordance with National laws and regulations and IFC Performance Standards and Equator Principles IV.

Alba's engagement with various stakeholder categories is given in Table 1.5. The Project-specific SEPs outline the communication plan with its respective stakeholder groups. Alba's stakeholder engagement team, whether for operations or projects, will use this as the base for communicating with the identified stakeholders.

| Id | Target Group | Interest in Alba | Information provided by Alba | Engagement Technique | Frequency | Timeline | Responsible |
|----|--------------|---|---|--|-------------------------------------|---|--|
| 01 | Government | <p>Regulates and influences Alba's operations and any of its projects in terms of establishing policies, granting permits or other approvals. Monitoring and enforcing compliance with Bahrain's various ES laws.</p> <p>Interested in matters such as Air Quality, Solid and Liquid waste, Conservation of resources, Energy conservation, Biodiversity, Groundwater Resources, Traffic Management, Human Resource Management, Technology and research development, Grievance Mechanisms</p> | <p>Alba's progress in terms of production, E&S impacts, health and safety measures, etc.</p> <p>Project details, construction planning and activities, potential E&S impacts on local communities and businesses, ESIA and plans relevant to the project such as Operational & Environment Social Management Plan, Construction & Environment Management Plan, Emergency Plans</p> <p>Traffic Management, etc., Health & safety standards and worker welfare during projects</p> <p>Compliance with the national business, safety, health, social and environmental laws and regulations</p> <p>Recruitment and Training of nationals</p> <p>Procurement of supplies and services</p> | <p>Emails</p> <p>Formal meetings</p> <p>Distribution of technical documents</p> <p>Presentations</p> <p>Audits</p> <p>Meetings</p> <p>Annual Report</p> <p>Sustainability Report</p> <p>Periodic E&S reports</p> <p>Regulatory Filings</p> <p>Press Releases</p> <p>Social Media</p> <p>ESIA and any supplementary ESIA</p> <p>Permits & Approvals Register</p> <p>Stakeholder consultation during ESIA phase</p> <p>Stakeholder Exhibitions Meeting</p> <p>Stakeholder meetings pre and during construction</p> <p>Alba Grievance Mechanism</p> <p>Alba Website</p> | <p>Regularly</p> <p>As required</p> | <p>Pre, during and Post construction of project</p> <p>Regular operations</p> | <p>Alba Management Project Team</p> <p>EPC/EPCM Contractor</p> |

| Id | Target Group | Interest in Alba | Information provided by Alba | Engagement Technique | Frequency | Timeline | Responsible |
|----|--|---|---|--|---------------------------|--|------------------------------|
| | | <p>Employee training etc. Alignment with national policies and plans. Revenue/benefit sharing. Partnerships for the benefit of downstream industry. Job creation. Labour management, migration workers and population. Provides information to Alba on various aspects such as utilities and infrastructure, latest developments on a national level, surrounding communities, etc.</p> | | | | | |
| 02 | Civil Society Groups including Peers, Industrial Associations, | Welfare of the local communities' residents E&S impacts of any project and/or construction activities | Grievance resolution process (including in response to any issues during construction of project) | Workshops CSR initiatives Volunteering events Alba Grievance Mechanism Sustainability Report | Annual As Required | Pre and during and construction of project | Alba Management Project Team |

| Id | Target Group | Interest in Alba | Information provided by Alba | Engagement Technique | Frequency | Timeline | Responsible |
|----|-------------------------------|--|---|---|---|---|------------------------------|
| | NGOs, Special Interest Groups | Human Rights and migrant workers welfare and rights Emergency response strategies Social, environmental and health management and monitoring plans | Projects and construction activities ESIA, supplementary ESIA and SEP E&S impacts and mitigation measures | Annual Report Press Releases Social Media Alba Website H&S Awareness campaigns ESIA and any supplementary ESIA Sponsorships and partnerships Stakeholder consultation during ESIA phase Stakeholder Exhibitions Meeting Stakeholder meetings pre and during construction | | | |
| 03 | Local Business | Alba is situated in South Alba Industrial Estate (SAIE), which is one of the seven industrial areas in Bahrain comprising a cluster of industrial and commercial companies including | Expansion plans New project/s undertaken by Alba Consulted and informed during the ESIA stage of any Project, continuously updated about the project and Construction activities, E&S | Press Releases Social Media Alba Website Stakeholder consultation during ESIA phase Stakeholder Exhibitions Meeting | Regularly, during project construction phase As required | Pre and during and construction of project Post construction of project to address any open issues | Alba Management Project Team |

| Id | Target Group | Interest in Alba | Information provided by Alba | Engagement Technique | Frequency | Timeline | Responsible |
|----|-------------------|--|---|--|-------------|---|-----------------|
| | | <p>local entrepreneurs and businesses. Business by providing goods and services to Alba including long-term partnerships, sharing resources, etc. Grievance process Appropriate emergency response strategies, disclosure and consultation during projects</p> | <p>impacts and mitigation impacts, etc. Tendering process for goods and services for operations as well as projects Grievance resolution process (including in response to any issues during construction of project)</p> | <p>Stakeholder meetings pre and during construction Adverts Alba Grievance Mechanism Sustainability Report Formal meetings Letters Emails</p> | | | |
| 04 | Media | <p>Interested in Alba's performance as a national company and global smelter Responsible E&S operations Disclosure of information about project</p> | <p>Regular updates on Alba and its operations, awards, E&S performance, projects, appointments, strategies, etc.</p> | <p>Press Releases Social Media Alba Website Adverts Emails Meetings Stakeholder Exhibitions Meeting Events Information Posters/Banners</p> | As Required | <p>Pre, during and post construction of project Regular operations</p> | Alba Management |
| 05 | Local Communities | <p>Employment and training opportunities</p> | <p>Job opportunities through job portal and announcements</p> | <p>Alba Website (Career Page)</p> | As required | <p>Pre, during and post</p> | Alba Management |

| Id | Target Group | Interest in Alba | Information provided by Alba | Engagement Technique | Frequency | Timeline | Responsible |
|----|----------------|---|---|--|---------------------------------------|---|------------------------|
| | | <p>for residents of the local communities E&S impacts of any project and/or construction activities During projects, migrant workers habitation and social interaction within the community Emergency response strategies</p> | <p>Grievance resolution process (including in response to any issues during construction of project) Alba's business impacts on local environment, area development, job opportunities Consulted and informed during the ESIA stage of any Project, continuously updated about the project and Construction activities, E&S impacts and mitigation impacts, etc. employment plans for projects CSR projects such as beach clean-up, tree plantation, etc.</p> | <p>Social Media Stakeholder consultation during ESIA phase Stakeholder Exhibitions Meeting Stakeholder meetings pre and during construction, if required Adverts Alba Grievance Mechanism Sustainability Report Volunteering Information Posters/Banners</p> | | <p>construction of project</p> | <p>Project Team</p> |
| 06 | Alba Employees | <p>Could be permanent, temporary or contractual and the unions A good and safe working environment</p> | <p>Alba's operations, new developments, financial progress, projects and construction activities, S&H policies and procedures, injuries, bonus, changes to management structure and</p> | <p>Press Releases Social Media channels, Alba Website Sustainability Report Annual Report</p> | <p>Regularly As Required</p> | <p>Pre, during and post construction of project Regular operations</p> | <p>Alba Management</p> |

| Id | Target Group | Interest in Alba | Information provided by Alba | Engagement Technique | Frequency | Timeline | Responsible |
|----|------------------|--|---|---|------------------------------|--|-----------------|
| | | Higher education and Professional development Timely salary and benefits Ethical business practices Overall and specifically, financial performance | systems, Professional development, Training and career growth, Benefits, etc. | Alba Grievance Mechanism Internal newsletters Digital screens WhatsApp Information Posters/Banners | | | |
| 07 | Alba Contractors | Tendering opportunities and contracts, timely payments, working conditions, S&H management systems and policies and procedures, ethical business practices, grievance resolution process, trainings, updated information on Alba's HSEMS, compliance to various laws and procedures. | Alba's operational requirements, new developments and projects, new policies and procedures, trainings on Alba management systems, as well as ACOPs, JSPs, S&H Policy, etc. | Meetings Awareness sessions Workshops and trainings for implementation of operational and project procedures Alba Grievance Mechanism Alba's Procurement Management Systems Information Posters/Banners On-site meetings Toolbox Talks Induction & sensitivity | Regularly As Required | Pre, during and post construction of project Regular operations | Alba Management |

| Id | Target Group | Interest in Alba | Information provided by Alba | Engagement Technique | Frequency | Timeline | Responsible |
|----|----------------------------|---|--|---|--------------------------------------|--|------------------------------|
| | | | | Training | | | |
| 09 | Vulnerable Groups | Welfare of the members of the group E&S impacts of any project and/or construction activities Emergency response strategies Social, environmental and health management and monitoring plans | Grievance resolution process (including in response to any issues during construction of project) ESIA, supplementary ESIA and SEPs, which give information on E&S impacts and mitigation measures. | Workshops Alba Grievance Mechanism Sustainability Report Annual Report Press Releases Social Media Alba Website ESIA and any supplementary ESIA consultation during ESIA phase Stakeholder Exhibitions Meeting Stakeholder meetings pre and during construction Formal Meetings Information Posters/Banners | As Required | Pre, during and post construction of project | Alba Management Project Team |
| 10 | Investors and Shareholders | Return on Investment Ethical and Responsible business operations Growth strategies | Alba's financial progress Strategies E&S performance Expansion projects Share price | Management Review Meetings Board Meetings Emails Reports | Periodic Regularly As Required | Pre, during and post construction of project | Alba Management |

| Id | Target Group | Interest in Alba | Information provided by Alba | Engagement Technique | Frequency | Timeline | Responsible |
|----|--------------|--|--|--|--------------------------------------|--------------------|-----------------|
| | | | | Meetings Roadshows Conference Calls Annual Report Sustainability Report Periodic reports Certification Regulatory Filings Press Releases Social Media Enterprise Risk Management Framework Events | | Regular operations | |
| 11 | Customers | Business performance Sales & Marketing Strategies Brand Image and Ethical and responsible production Procurement of raw material and supplies and services Superior technology Product delivery, timely delivery of | Alba's financial progress E&S performance Expansion projects Grievance resolution process (including in response to any issues during construction of project) new developments and projects, partnerships | Formal Meeting Agreements Emails Reports Meetings Roadshows Conference Calls Annual Report Sustainability Report Press Releases Social Media SAP Ariba Certifications | Periodic Regularly As Required | Regular operations | Alba Management |

| Id | Target Group | Interest in Alba | Information provided by Alba | Engagement Technique | Frequency | Timeline | Responsible |
|----|---------------|--|---|---|-----------------------------------|--|--|
| | | goods and post-sales service | | Events | | | |
| 12 | Suppliers | Business Partnerships | New developments Update on requirements in a timely manner Expansion projects Grievance resolution process (including in response to any issues during construction of project) | Formal Meetings Emails Meetings Press Releases Social Media Alba's Procurement and Vendor Management Systems SAP Ariba Compliance Reports | As Required | Pre, during and post construction of project Regular operations | Alba Management |
| 13 | Lenders Group | Alba's performance, financial performance, compliance to national and international E&S standards, meeting Lenders Group requirements, ethical and responsible practices | Alba's production, health and safety measures, etc. Project details, construction planning and activities, potential E&S impacts on local communities and businesses, preparation and approvals of the ESIA and plans relevant to the project such as Operational & Environment Management Plan, Construction & Environment Management Plan, | Emails Formal meetings Distribution of technical documents Presentations Audits Meetings Annual Report Sustainability Report Periodic E&S reports Regulatory Filings Press Releases Social Media | Periodic Annual As Required | Pre, during and post construction of project Regular operations | Alba Management Project Team EPC/M Contractor Subcontractor of the project |

| Id | Target Group | Interest in Alba | Information provided by Alba | Engagement Technique | Frequency | Timeline | Responsible |
|----|------------------------|--|---|--|-------------|--------------------|-----------------|
| | | | <p>Emergency Plans, Traffic Management, etc., as well as monitoring of health & safety standards and worker welfare during projects.</p> <p>Compliance with the national business, safety, health, social and environmental laws and regulations</p> <p>Recruitment and Training of nationals</p> <p>Procurement of supplies and services</p> | <p>ESIA and any supplementary ESIA</p> <p>Alba Website</p> | | | |
| 13 | Educational Institutes | <p>Educational and training opportunities for national</p> <p>Research opportunities</p> <p>Experts from Alba for events</p> | <p>Generic information on Alba</p> <p>Training & developments plans</p> | <p>Press Releases</p> <p>Social Media</p> <p>Alba Website</p> <p>MoUs</p> <p>Vocational Training</p> | As Required | Regular operations | Alba Management |

Table 1.5 - Alba's Stakeholder Engagement Plan

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 has been identified to develop the Materiality Matrix.

| Environment | | Social | | Governance | |
|-------------|---------------------------------|--------|--|------------|---|
| I. | Climate Change | VI. | Human Rights | XII. | Corporate Governance |
| II. | Water and Wastewater Management | VII. | Our People (Social/Employee Welfare, Cultural Diversity and Equal Opportunity) | XIII. | Economic Results |
| III. | Recycling & Waste Management | VIII. | Local Community Engagement | XIV. | Compliance with Statutory and Regulatory Requirements and Anti-Corruption |
| IV. | Energy Management | IX. | Health and Safety | XV. | Sustainable Supply Chain and Responsible Sourcing |
| V. | Biodiversity | X. | Technology and Operational Excellence | | |
| | | XI. | Our Product (Metal Marketing & Product Labelling) | | |

4.6 Dissemination of the SEP

The SEP, once approved, will be posted on Alba's website – www.albasmelter.com.bh.

Further, the SEP will be also disseminated to all stakeholders via the following methods:

- Mass email communication through the Procurement and Warehousing Team to ensure that all our clients, vendors, contractors and other stakeholders receive it;
- Project teams to communicate the same via email to their contractors and sub-contractors; and
- Post on Alba's LinkedIn and Inter:Connect (the Company's internal medium).

5 SEP FOR PROJECTS

5.1 Introduction

Alba is committed to constructing all its projects as per applicable guidelines, and thereafter operating them in an environmental and social manner. Project-related SEPs are a key element of Alba's operations, describing how stakeholders, including interested organisations and individuals are being engaged as part of the ESIA process of every project. Further, engagement activities may or may not be planned based on the scale and need of the Project.

The objectives of a Project-related SEP are:

- Identify all stakeholders who are indirectly or directly affected by and/or interested in the Project;
- Outline modalities for information dissemination and stakeholder engagement activities, including their purpose, frequency and location during project preparation and implementation;
- Ensure early identification of risks and appropriate mitigation measures as part of the Project documentation;
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the Project life on issues that could potentially create an impact;
- Provide a functional grievance redressal system for project-affected parties and ensure that these grievances are responded and managed in a timely manner;
- Ensure that technically and culturally appropriate project information on E&S risks and impacts are disclosed in a timely, understandable and accessible format;
- Define the roles and responsibilities of different individuals/departments to implement and monitor these activities; and
- Meet required National laws, IFC Performance Standards, Equator Principles, and/or Lenders Group requirements.

5.2 Engagement during construction

Alba seeks to engage proactively with its stakeholders during construction stages. Stakeholder engagement during the construction phase will relate to all activities leading up to and during the physical construction of the main project and other infrastructure related to the project, including the management of contractors and construction contracts.

Engagement during the construction will essentially be about involving stakeholders during the ESIA process, addressing stakeholder concerns and grievances as well as monitoring and managing project impacts.

This stakeholder engagement process is conducted by Alba, in close cooperation with the EPC/EPCM contractors, where stakeholders are identified using stakeholder engagement performed at earlier project stages, associated mapping prepared as part of the project area of influence (PAOI) identifying potential E&S risks, and information gathered from mapping that was supported with online Google Earth, local cadastral maps and the Geographic Information System (GIS).

During the different stages of construction, information concerning various matters such as traffic management, employment opportunities, project activities and schedule, risks and mitigation measures related to E&S, community, security issues, grievance management etc. is given to relevant stakeholders through e-mail, letter and meetings, with or without the involvement of the concerned governing authority.

Project milestones and such other information are disseminated via official Press Releases and social media channels, as well as internal newsletter and/or magazine.

If required, a stakeholder exhibitions meeting is also held for all stakeholders to highlight details of the project including E&S risks and mitigation measures as well as grievance management system. Details of such as exhibitions meeting are captured in the Project-SEP.

5.3 Post Construction Engagement

The E&S risks related to the Company's operations are incorporated into the control measures, HSEMS and relevant procedures for example -- Social Performance Management System and the Operation Readiness and Implementation Plan, all of which arise from the approved ESIA for the Project. This enables and guides the Alba operations team to manage the risks.

In general, the transition from the construction phase to operations means fewer project impacts and grievances, which usually translates to less engagement with stakeholders. Post construction, engagement is envisaged as continuing to provide information on the project as necessary, as well as following up on any open issues associated with the project through the local authorities and/or addressing and resolving grievances received through the External Grievance Management system.

However, in some instances there might be a need to discuss and/or consult Alba stakeholders; for example, issues related to Traffic Management will be discussed with the Traffic Directorate and Municipal Council, who are part of the Government Stakeholder category.

5.4 Previous SEPs

Alba's SEP for the Line 6 Expansion Project, Port Capacity Upgrade Project and Power Station 5 Block 4 Expansion Projects are available on the Company's website.

[Corporate Social Responsibility - Aluminium Bahrain \(Alba\) \(albasmelter.com\)](http://albasmelter.com)

6 EXTERNAL GRIEVANCE MECHANISM

6.1 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.

6.2 Requirements

The key requirements of a Grievance Mechanism as per the IFC Performance Standards is highlighted in Table 1.6.

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". |

Table 1.6 - IFC PS for Alba's Grievance Mechanism Stakeholder Engagement

6.3 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.

6.4 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.

6.5 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.

6.6 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.

6.7 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.

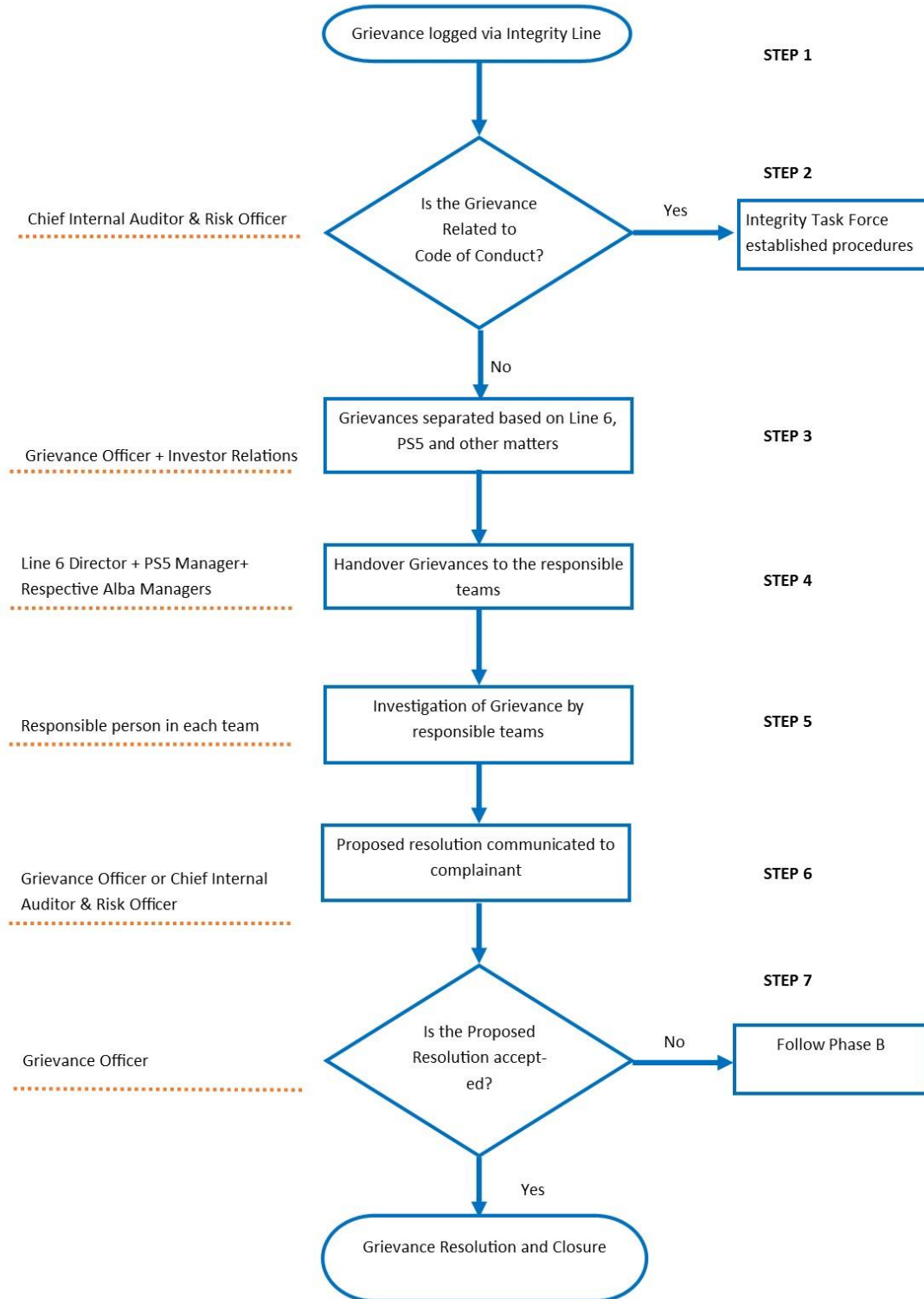
To facilitate tracking, evaluation and response to grievances, standardised information will be collected and recorded on the Alba External Grievance Mechanism Logging Form. As a best practice, the complainant/s should always carry this Form if they are attending any meeting with Alba parties or during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

Alba's assigned GO will be the point of contact at all times 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.

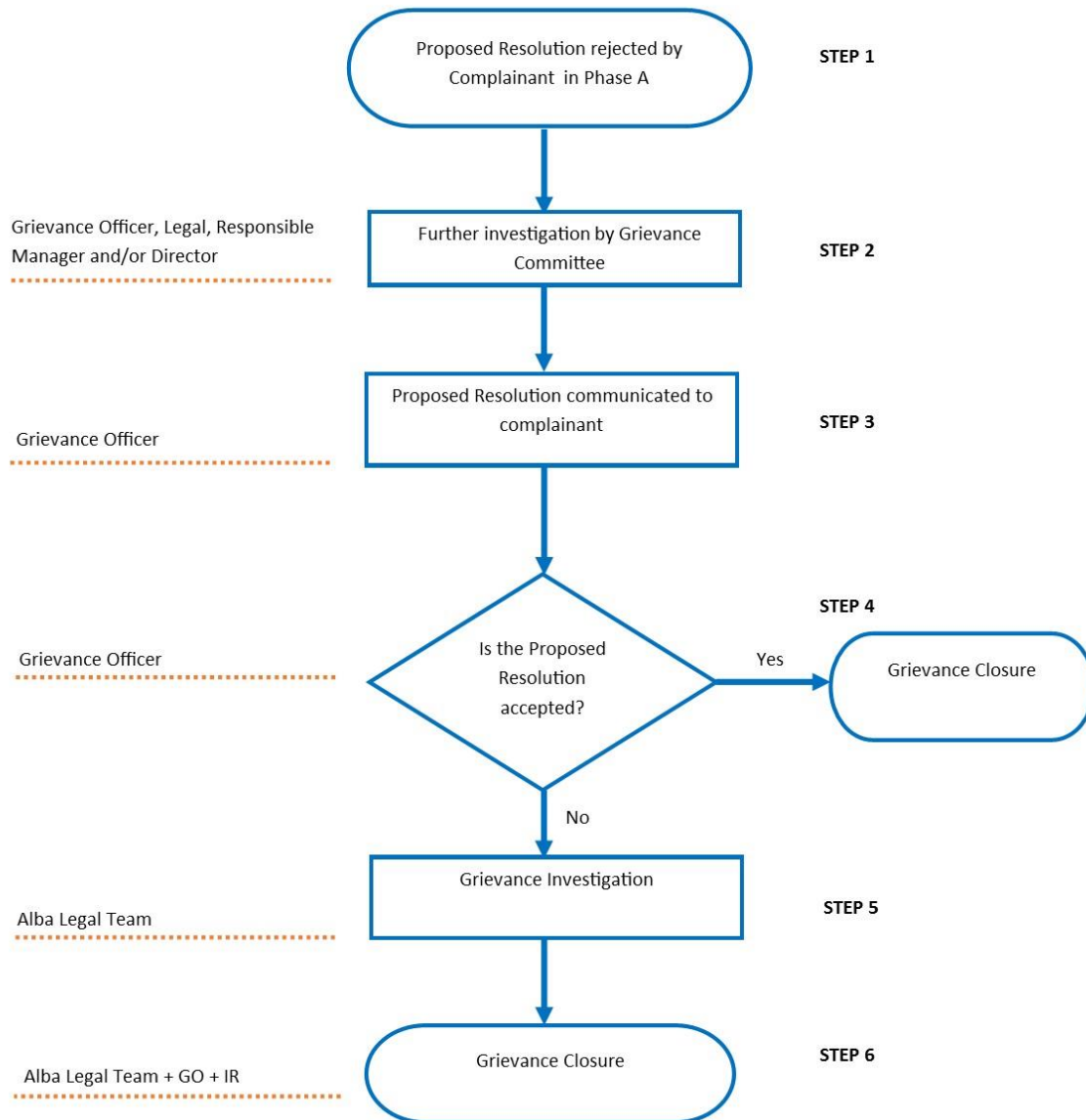
6.8 Process Flow of External GM

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



6.9 Dissemination and Monitoring of the Grievance Mechanism

Alba is keen to ensure that all parties are aware of its Grievance Mechanism channels at all times. Hence, to ensure that all stakeholders know they can reach Alba on various matters, every Press/Media Release carries information on the Grievance Mechanism, in Arabic and English, in the Boiler Plate. Below is a snapshot of the same.

Media Release – 03 January 2023
Manama (ALBH)

Alba closes 2022 with a record-breaking production of 1,600,111 MT

Aluminium Bahrain B.S.C. (Alba), one of the world's largest aluminium smelters, has set a new historic production record of 1,600,111 metric tonnes (MT) in 2022 – an increase of 38,889 MT versus 1,561,222 MT in 2021 (+2.5% Year-on-Year), as announced by the Company today 03 January 2023.

Commenting on this milestone, Alba's Chief Executive Officer, Ali Al Baqali stated:

"This all-time production record translates our motto 'opportunities don't happen, we create them by doing the best we can with what we have'. We also look forward to set new highs in the future driven by our in-house production creep.

I take the opportunity to express my gratitude to the Management team, our employees and contractors' personnel for making our 2022 objectives a reality by challenging themselves to do more safely and responsibly."

A special ceremony, attended by the Executive Management, Directors, Managers and employees from various departments, was held at Alba's Product Yard to mark this achievement.

ENDS

Photo Caption
Group Photo
About Aluminium Bahrain B.S.C. (Alba)
(Ticker: ALBH)

At plus -1.6 million metric tonnes per annum (2022), 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-ship 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 and topped 30 million Safe working-hours without Lost Time Injury (LTI) on 01 September 2022 for the first time in its history.

Alba produces high-quality Aluminium products in the form of Standard and Value-Added Products (VAPs), which are exported to more than 240 global customers through its sales offices in Europe (Zürich), 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 Bahraini: Mumtazak Holding Company B.S.C. @ (65.38%), SABIC Industrial Investments Company (SIIC) (20.62%) and General Public (14%). Alba holds globally-recognized certifications such as ISO 9001, ISO 14001, ISO 27001, ISO 43001, IATF 16949:2016, ISO 22321:2012, Business Continuity Management System (BCMS) and ASI Performance Standard Certification and Equivalency 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 Bahraini 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, products, Social contribution and Corporate Governance. Launched in February 2022, the Company's ESG Roadmap outlines 6 priority areas - 1) Decarbonation, 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. Alba's recent projects such as the first-of-its-kind US\$37.5 million zero-waste Spent Pot Lining Treatment Plant and the upcoming 37-MW Solar Farm Project 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 play a crucial role in the upcoming Aluminium Downstream Park, which will increase the contribution of non-oil sectors to the GDP of Bahrain.

Alba's motto 'Safety First, Safety Always' has ensured that the safety and well-being of its employees and contractors' workforce remain a top priority. The Company has been recognised internationally for its excellent Safety and Health track record with awards such as the RUSPA Gold Award (5 years in a row) and International Safety Award with Merit from British Safety Council, as well as a major National Safety Council (NSC) USA awards for 2021. Alba has also been recognised for its initiatives to produce Aluminium responsibly through awards such as Top ESG performer in Bahrain by ESG Invest, Safeguard Label from Bureau Veritas and Best Corporate Governance Award by Ethical Boardforum.

Alba Power Station 5 Block 4 Expansion Project
Alba Power Station 5 (PSS) Block 4 is a Combined Cycle Power Plant that is an expansion of the existing PSS.

PSS Block 4 Project is the addition of a fourth Block of similar 1:1:1 configuration with 2-class gas turbine technology and with minimum nominal ISO rating of a 933 MW and includes fit into the existing 220KV Substation. The efficiency of this combined cycle power plant is much higher than the combined cycle power plants of PSS and PSA. On completion of PSS Block 4 Expansion Project, the nameplate capacity of PSS will increase from 1,800 MW to 2,481 MW.

Mitsubishi Power & SEPCOII consortium will be responsible to design, engineer, procure, construct and commission Block 4. PSS Block 4 commercial operations are expected to begin in Q4 2024.

Alba External Grievance Mechanism

Alba's External Grievance Mechanism receives and facilitates the resolution of any affected communities' concerns and grievances about Alba's Environment and Social (E&S) performance. External grievances about Alba's E&S performance can be lodged via the [Alba External Grievance Mechanism](mailto:Alba.General@albahm.com) independently operated confidential reporting hotline in multiple languages – via a toll-free phone service or via the internet, 24 hours a day (7 days a week).

Alba Response to COVID-19 Pandemic

Alba's response strategy to COVID-19 was initiated back to January 2020 in line with the guidelines of Bahrain National Taskforce for Combating Coronavirus (COVID-19). The Company was able to maintain safe operations throughout 2021 thanks to its nimble workforce – employees and contractors' personnel.

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تفكيك الصور للشتر - 6 أيلول 2023
العلامة (ALBH)

ألبا تتقدم خطوة مؤسسية لموظفيها

تتقدم شركة الألمنيوم البحرين فرج، (ألبا) خطوة مؤسسية لموظفيها بتاريخ 6 أيلول 2023 في جزمة فندق الخنج الرياضيه.

أهبطت البنية تحتية ريفية رئيسية لمبنى إدارة شركة ألبا للتعليق رديج من سلمان بن رديج آل خليفة، وبحضور عدد من أعضاء مجلس إدارة الشركة والمديرين والموظفين على ألبا، إهداء الميثاق التنفيذية والإدارية، ومجلس تنفيذي المعامل والمركبة إلى الجديد من الموظفين من معمل دوائر وإقسام الشركة.

هذا وأعلنت الإعلامية لفرصة التواصل وإيجاد الهادي وأقرب الأصدقاء بمبادئ شهر رمضان المبارك.

الشهي

تبدأ عن شركة العقود البحرين يومه (03)
[من القبول: ALBH]

ثم بدأ مدير العموم للشهي في التحدث عن فرص العمل والخدمة المتميزة والفرص المتاحة لموظفي الشركة في ظل نموها المستمر في ظل نمو قطاع الأعمال العالمي.

وتحدث أيضا عن كبرى الشركات في المملكة البحرين، حيث تقوم الشركة بتسليم مشاريع البناء الجديدة، في ظل متطلبات عملاء وأصحاب العلاقات الدولية، وفي ظل متطلبات الشركة في ظل نموها المستمر في ظل نمو قطاع الأعمال العالمي، حيث تقوم الشركة بتسليم مشاريع البناء الجديدة، في ظل متطلبات عملاء وأصحاب العلاقات الدولية، وفي ظل متطلبات الشركة في ظل نموها المستمر في ظل نمو قطاع الأعمال العالمي.

وتحدث أيضا عن كبرى الشركات في المملكة البحرين، حيث تقوم الشركة بتسليم مشاريع البناء الجديدة، في ظل متطلبات عملاء وأصحاب العلاقات الدولية، وفي ظل متطلبات الشركة في ظل نموها المستمر في ظل نمو قطاع الأعمال العالمي، حيث تقوم الشركة بتسليم مشاريع البناء الجديدة، في ظل متطلبات عملاء وأصحاب العلاقات الدولية، وفي ظل متطلبات الشركة في ظل نموها المستمر في ظل نمو قطاع الأعمال العالمي.

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For projects, Alba’s Stakeholder Engagement team ensures that a presentation on Alba’s Grievance Mechanism is given to all the project’s contractors and sub-contractors during the early stages. The same presentation is shared via email and is required to be shared with their teams.

Alba also reaches out to its supplier, vendors, clients, contractors, etc. through its Procurement Department. Alba’s Code of Conduct, which is the base for Alba’s Integrity Line, is sent to the stakeholders via the following methods:

- 1) Mass email communication
- 2) As part of Vendor registration
- 3) Website (vendor general guidelines)
- 4) Ariba Supplier’s portal (Alba’s welcome page)
- 5) Ariba Buyer portal through ‘supplier information portal’ page
- 6) Contractual glossary (In every PO)

Alba intends to increase its communication on the Grievance Mechanism by:

- 1) Including it as a signature for all Project teams going forward; and
- 2) Posting on Alba’s LinkedIn and Inter:Connect.

Monitoring the Grievance Mechanism will be 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 1.7 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 |
|---|---|----------------------------------|-----------|

Table 1.7 – KPIs to measure grievance monitoring

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

This SEP has been prepared in line with Bahrain's National laws and regulations, best international practice including International Finance Corporations (IFC) Performance Standards and Equator Principles (EP) - IV as well as Alba's existing HSEMS, S&H Policy, ESG Framework, etc.

If there would be any further need for stakeholder engagement, it would be undertaken in line with the above and/or any other requirements.

7 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 and Health | S&H |
| Environment, Social & Governance | ESG |
| Human Resources | HR |
| Environment and Social Impact Assessment | ESIA |
| Key Performance Indicators | KPI |