

ALUMINIUM BAHRAIN B.S.C. PORT CAPACITY UPGRADE PROJECT STAKEHOLDER ENGAGEMENT PLAN

Contents

1	INTRODUCTION	4
1.1	Document Name and Number	4
1.2	Purpose.....	4
1.3	Application & Scope	4
1.4	Approvals and Authority	5
1.5	Objectives	5
1.6	Resources and Responsibilities	5
1.8	Cross Links to other Alba Plans	6
2	REGULATORY FRAMEWORK AND REPORTING	8
2.1	Introduction.....	8
2.2	National Laws and Regulations	8
2.3	Applicable International Standards and Guidelines.....	8
3	PROJECT CONTEXT.....	13
3.1	Company Background	13
3.2	Project Background	13
3.3	Project Description	13
3.4	Project Schedule.....	18
4	ESIA FOR THE PROJECT	19
4.1	ESIA.....	19
4.3	Publication of the ESIA	19
4.4	Legal Requirement for ESIA.....	19
4.5	Planning and Land Use	20
4.6	Potential Area of Influence (AOI)	26
5	STAKEHOLDER IDENTIFICATION AND PRIORITISATION	30
5.1	Introduction.....	30
5.2	Stakeholder Categories and Identification	30
6	STAKEHOLDER ENGAGEMENT	36
6.1	Introduction.....	36
6.2	Stakeholder Principles.....	36
6.3	Stakeholder Engagement to Date	36
6.4	Alba Sustainability Report	43
6.6	Stakeholder Engagement Techniques	44
6.7	Alba SEP Table	44
6.8	Stakeholder Exhibitions Meeting	48

6.9	Highlights of the SEM	48
6.10	Communications Plan for the SEM.....	48
6.11	Stakeholder Monitoring and Reporting	48
6.12	Final SEP	48
7	EXTERNAL GRIEVANCE MECHANISM.....	49
7.1	Introduction.....	49
7.2	Requirements	49
7.3	Definition.....	49
7.4	Principles	50
7.5	Confidentiality	50
7.6	Scope	50
7.7	Alba Integrity Line: External Grievance Reporting Channel	50
7.8	Process Flow of External GM.....	51
7.9	Monitoring of the Grievance Mechanism	54
	Glossary	55

1 INTRODUCTION

1.1 Document Name and Number

The SEP_Port_PLN_001 is the formal document of Aluminium Bahrain B.S.C. (Alba), also referred to as the Company, detailing its Stakeholder Engagement Plan (SEP) for the Port Capacity Upgrade Project, herein known as the Port.

1.2 Purpose

Alba has already published Alba SEP_PLN_001_Version 002 detailing stakeholder consultation and engagement, particularly prior to and during the construction of the Line 6 Expansion Project, which includes the construction of a sixth potline (Line 6) and Power Station 5 (PS5).

Part of the Line 6 Expansion Project is the Port at Sitra Marine Terminal to import increased quantities of alumina and calcined petroleum coke.

The SEP_Port_PLN_001 is the formal Stakeholder Engagement Document of Alba detailing stakeholder consultation and engagement, particularly prior to and during the construction of the Port. It presents a planned and culturally appropriate stakeholder consultation and engagement process for the Port. It summarizes stakeholder relations that have been established and further consultations that will materialise throughout the duration of the Port. The stakeholder engagements and consultations meet the obligations and expectations of the Company, the Government and the Lenders.

The SEP_Port_PLN_001 is intended as a public document for all stakeholders. It also includes a section on Alba's External Grievance Mechanism, which is open for any stakeholders or public to raise any concerns as well as provide feedback and comments about Alba, the Line 6 Expansion Project and the Port.

1.3 Application & Scope

The SEP_Port_PLN_001 is a live Document until the completion of the Port activities, which is due in April 2020. The requirements set-out in this Document applies to all of the Port's operations as well as contractors, including during and post construction of the Project.

SEP_Port_PLN_001 will be regularly reviewed by the Investor Relations (IR) and Port teams, and if required, updated to reflect outcomes of the continued engagement.

Any changes to Alba's Health, Safety and Environmental Management System (HSEMS) may result in changes to this Document.

1.4 Approvals and Authority

This Document is owned by Alba's IR Department.

All Request for Changes (RFC) must be addressed to the IR Department, which will be followed-up with the Executive Management thereafter changes will be implemented after obtaining the requisite approvals.

1.5 Objectives

The objectives of this Document are to:

- Outline stakeholder engagement requirements as per Bahraini legislation and international best practice requirements of International Finance Corporation (IFC) and Equator Principles;
- Identify key stakeholder groups that are affected, and/or able to influence the Port and its activities;
- Describe the most effective methods to disseminate Port information and consult with and gather feedback from affected stakeholders;
- Identify and develop measures to effectively mitigate Environment and Social (E&S) risks that are likely to arise from the Port through stakeholder consultation and engagement;
- Include a formal External Grievance Mechanism channel for stakeholders and public to raise any concerns, provide feedback and comments about the Port; and
- Develop a measuring and monitoring system to ensure the effectiveness of the SEP_Port_PLN_001.

1.6 Resources and Responsibilities

Principle roles and responsibilities for the implementation of the Port SEP_001 are outlined in the below table:

Entity	Responsibilities
IR	<ol style="list-style-type: none"> 1. Owner and accountable for the SEP_Port_PLN_001; 2. Assign a resource to manage the SEP and the External Grievance Mechanism who will: <ul style="list-style-type: none"> • Oversee stakeholder engagement activities for the Port's Environment and Social Impact Assessment (ESIA); • Manage the implementation and monitoring of the SEP_Port_PLN_001; • Perform monitoring and evaluation to track the grievances for the Port through the Alba External Grievance Mechanism; • Draft and disclose annual Sustainability Report; • Draft and publish the Annual Report; • Coordinate regulatory/government reporting when required; • Coordinate lender reporting and follow-up; and • Provide for ESIA disclosure.
Safety, Health & Environment (SHE)	<ol style="list-style-type: none"> 1. Oversee and audit all contractors in their implementation of the requirements of Health, Safety and Environment by the Supreme Council for Environment (SCE) and IFC. 2. Oversee and audit all contractors in their implementation of the HSESMS and other SHE Plans; 3. Coordinate with Government emergency services as required; 4. Coordinate with Government authorities as required; 5. Ensure HSEMS compliance and monitor its implementation.
Port Contractors	<ol style="list-style-type: none"> 1. Implement Alba HSEMS Plans; and 2. Investigate external grievances as per Alba request and report back to Alba.
ESIA contractor	<ol style="list-style-type: none"> 1. Plan and conduct stakeholder engagement activities for ESIA as per the agreed scope of work; 2. Perform stakeholder identification and stakeholder mapping and matrix; and 3. Consultations relevant to this SEP.

1.8 Cross Links to other Alba Plans

The SEP_Port_PLN_001 is cross-linked to other Alba Management Plans and Policies as given below.

Emergency Response Plan (ERP): The objective of the ERP 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 as well as any construction sites/areas under the authority of Alba.

The Ministry of Interior's Directorates and Emergency Response & Operations Centre for the Kingdom of Bahrain shall respond to all the emergency incidents that occur outside the

Company's vicinity and area (i.e. King Hamad Road, Um Al-Saad Road and Downstream Roads). However, Alba, as part of its Corporate Social Responsibility, shall provide support in terms of first aid and assistance as is possible and appropriate prior to the arrival of the emergency services.

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.

HSEMS: Alba's formal HSEMS ensures the effective management of various Safety, Environmental and Health risks, which in turn guide the management of the stakeholder engagement activities. This system is also used to ensure that the Project is in compliance with Alba's systems.

Traffic Management Plans: Comprehensive Traffic Management Plans have been prepared for the Port, which describe how vehicular and pedestrian traffic will be managed during the construction phase.

The SEP_Port_PLN_001 does not substitute or replace any of the Management plans aforementioned.

2 REGULATORY FRAMEWORK AND REPORTING

2.1 Introduction

The purpose of this section is to set-out the requirements that apply to stakeholder engagement for Project. These are derived from:

- National laws and regulations;
- IFC Performance Standards and Equator Principles III - June 2013
- Alba's existing HSEMS

2.2 National Laws and Regulations

In addition to meeting the requirements under the Performance Standards mentioned ahead, the Port complies with applicable National laws, including those laws implementing host country obligations under international law.

There are no established Bahraini laws and regulations specifying stakeholder engagement including the one that regulates the Environmental Impact Assessments (EIA) for projects in Bahrain. However, Alba will follow all the stipulated E&S laws as applicable to this Plan. Alba will also ensure that all contractors and sub-contractors meet other environmental standards and guidelines. This will be done through the Management Control Audits that will be undertaken by Alba's SHE Department.

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

In addition to satisfying national environmental regulations, part of the qualification for financing the Project is that it meets the IFC Performance Standards and Equator Principles III - June 2013, which are backed by World Bank Environmental, Health and Safety Guidelines.

2.3.1 IFC Performance Standards

To ensure that E&S risks on major international projects are adequately addressed, the international trade and finance community has developed a set of guidance documents. The Performance Standards describe the IFC's commitments, roles and responsibilities related to E&S sustainability directed towards clients, providing guidance on how to identify risks and impacts, and are designed to help avoid, mitigate and manage risks and impacts as a way of doing business in a sustainable way, including stakeholder engagement and disclosure obligations of the client in relation to project-level activities.

There are eight Performance Standards as follows:

- PS 1: Assessment and Management of Environmental and Social Risks and Impacts
- PS 2: Labour and Working Conditions
- PS 3: Resource Efficiency and Pollution Prevention
- PS 4: Community Health, Safety and Security

- PS 5: Land Acquisition and Involuntary Resettlement
- PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- PS 7: Indigenous Peoples
- PS 8: Cultural Heritage

2.3.2 Lender Requirements

Alba is committed to comply with the Equator Principles and the IFC Performance Standards, as part of the financing arrangements for the Project. Both the Equator Principles and the IFC Performance Standards have certain, very similar, requirements for stakeholder engagement, which are outlined in the below table:

Standard	Category	Requirements
IFC Performance Standard 1	Stakeholder Engagement	<ol style="list-style-type: none"> 1. Identify people or communities that are or could be affected by the project, as well as other interested parties. 2. 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. 3. 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. 4. 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. 5. The ESIA risks and impacts identification should take account of the outcome of the engagement process with Affected Communities as appropriate. 6. 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. 7. Affected communities should be engaged on issues that could potentially affect them, throughout the Project cycle. 8. Allow the views, interests and concerns of different stakeholders, particularly of the local communities directly affected by the Port (Affected Communities), to be heard, understood, and taken into account.
Equator Principle 5	Stakeholder Engagement	<ol style="list-style-type: none"> 1. 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 phases of development; the language preferences of the Affected Communities; their decision-making processes; and the needs of disadvantaged and vulnerable groups. 2. The consultation process should be free from external manipulation, interference, coercion and intimidation.

Standard	Category	Requirements
		<ol style="list-style-type: none"> 3. 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. 4. Take account of, and document, the results of the Stakeholder Engagement process, including any actions agreed resulting from such process. 5. For projects with environmental or social risks and adverse impacts, disclosure should occur early in the Assessment process, in any event before the project construction commences, and on an ongoing basis.
IFC Performance Standard 1	Grievance Mechanism	<ol style="list-style-type: none"> 1. Establish a grievance mechanism to receive and facilitate resolution of the affected stakeholders' concerns and grievances about the Project's environmental and social performance. 2. 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. 3. The mechanism should be appropriate to the scale of impacts and risks presented by a Project and beneficial for both the company and stakeholders. 4. The mechanism must not impede access to other judicial or administrative remedies. 5. Affected Communities should be informed about the mechanism in the course of the stakeholder engagement process.
IFC Performance Standard 4	Grievance Mechanism	A grievance mechanism should allow the affected community to express concerns about the Community Health, Safety and Security.
Equator Principle 6	Grievance Mechanism	<ol style="list-style-type: none"> 1. Establish a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's E&S performance. 2. 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. 3. Affected Communities should be informed about the mechanism in the course of the stakeholder engagement process.
IFC Performance Standard 1	Information Disclosure	<ol style="list-style-type: none"> 1. 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.

Standard	Category	Requirements
		<ol style="list-style-type: none"> 2. 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. 3. 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. 4. The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually.
Equator Principle 10	Information Disclosure	<ol style="list-style-type: none"> 1. At a minimum, a summary of the ESIA should be made accessible and available online.
IFC Performance Standard 1 and 4	Emergency Preparedness and Response	<ol style="list-style-type: none"> 1. Document the emergency preparedness and response activities, resources, and responsibilities, and provide appropriate information to potentially Affected Community and relevant government agencies. 2. 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). 3. 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.

2.3.3 Alba HSEMS

The Port will meet the requirements of Alba's HSEMS and Occupational Safety, Health and Environment (SHE) Policy at all times.

2.3.4 Project Standards

The Port will meet the requirements outlined in the sections 2.2, 2.3, 2.3.1, 2.3.2 and 2.3.3 above. In the event that national and international requirements differ, the Project will adhere to the more stringent requirements.

The following guideline documents are relevant to this project:

- General Environment, Health & Safety (EHS) Guidelines (World Bank, 2007a);
- IFC EHS Guidelines for Shipping, April 2007; and

- IFC EHS Guidelines for Ports, Harbours and Terminals, February 2017.

3 PROJECT CONTEXT

3.1 Company Background

Alba was incorporated by Charter in 1968 and officially commenced its operations in 1971 as a 120,000 tonnes per annum smelter. Today, Alba produces more than 1 million tonnes per annum of the highest grade aluminium, with products including standard and T-ingots, extrusion billets, rolling slab, properzi ingots, and molten aluminium. Close to 40 per cent of its output is supplied to Bahrain's downstream aluminium industry, with the rest exported to regional and international customers in the Middle East, Europe, Far East, South East Asia, Africa, and North America.

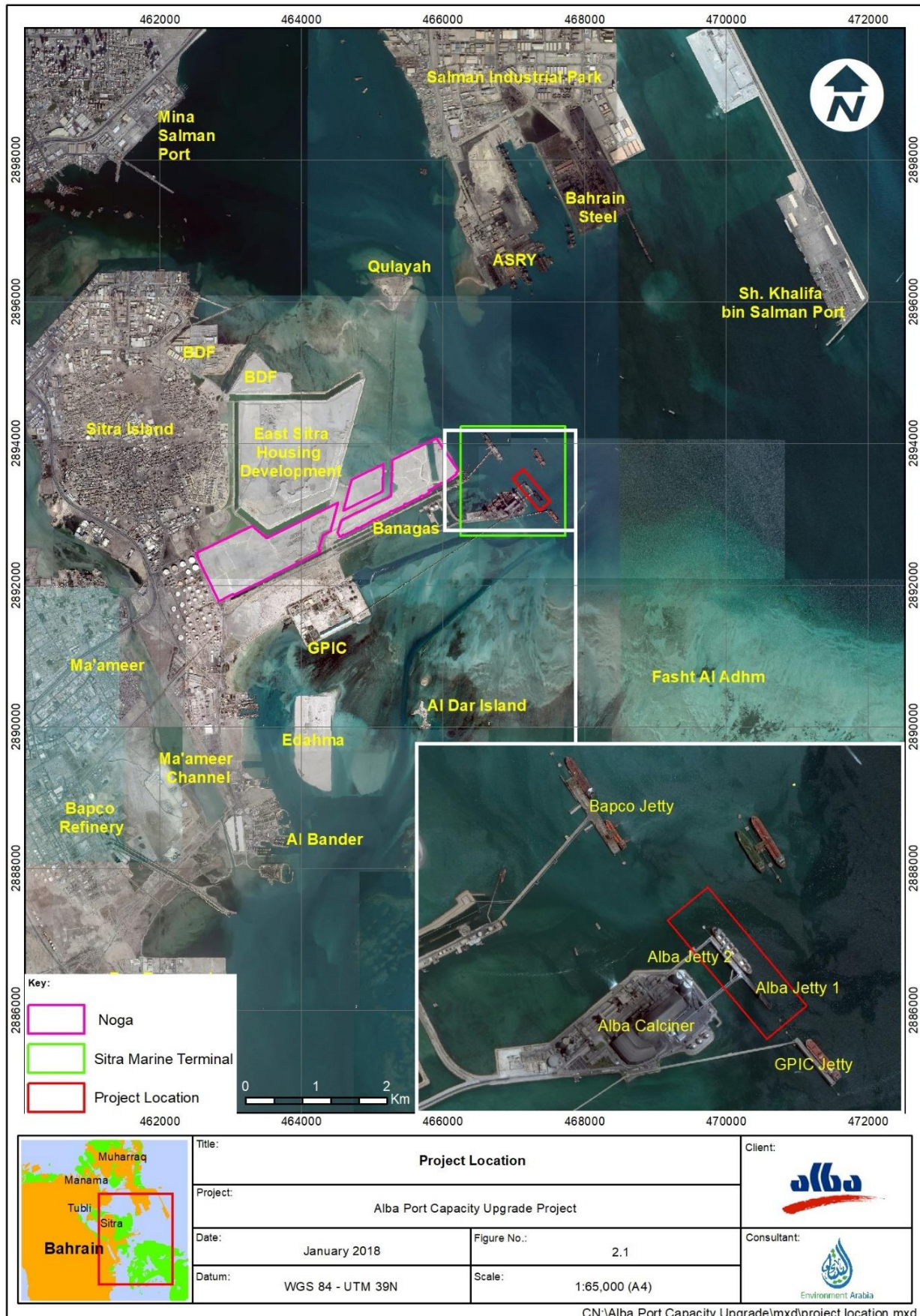
3.2 Project Background

Alba is expanding its smelter operations – Line 6 Expansion Project - to include a sixth potline (Line 6) and a new 1,792 MW power station (PS 5). With a CAPEX of approximately US\$ 3 billion, the Project is one of the largest brownfield developments in the region. Expected to begin production by early 2019, this Project will boost the smelter's per-annum production by 540,000 metric tonnes, bringing its total production capacity to 1.5 million metric tonnes per year. The Line 6 Expansion Project will make Alba the world's largest single-site aluminium smelter and be a significant economic boost for the Kingdom of Bahrain due to the many co-investment opportunities through local and foreign aluminium investments.

Due to this expansion, Alba needs to increase the import of raw materials via its existing port facility. If the Port does not go ahead, raw materials for the operation of Alba's six potlines will be insufficient, which will have an adverse impact on the profitability and competitiveness of the smelter. The Port is essential to support the smelter expansion.

3.3 Project Description

The Alba Calciner Plant and Port are located at the 'Sitra Marine Terminal' (Figure 2.1). The Marine Terminal is shared between Alba, Gulf Petrochemical Industries Company (GPIC), Bahrain National Gas (Banagas), National Oil and Gas Authority (NOGA) and the Bahrain Petroleum Company (Bapco). Alba facilities comprise two jetties with ship unloading equipment, conveyors, storage, road vehicle loading silos, water treatment plant, offices and a calciner for processing 'green' petroleum (pet) coke (GPC).



The upgrade will include the installation of a new ship unloader for alumina, additional facilities for offloading of Calcined Petroleum Coke (CPC) (which is not currently possible) and new storage silos for Alumina and CPC.

As required under SCE regulations, ESIA scoping reports were submitted in March 2018 which identified the environmental baseline conditions of the Port area and potential impacts on the surrounding environment during the construction and operation phases.

3.3.1 Existing Infrastructure

Jetty 1: Jetty 1 was constructed in 1971 and is used for offloading Green Pet Coke (GPC) and Liquid Pitch. This jetty is the southernmost jetty extending towards GPIC. Figure 2.2 is a picture of the jetty and the unloader.



Figure 2.2

Jetty 2: Jetty 2 was constructed in 1995 and is used for offloading Alumina and exporting Calcined Petroleum Coke. This jetty is the northernmost jetty extending towards Bapco. Figure 2.3 is an image of the vacuum unloader on Jetty 2.



Figure 2.3

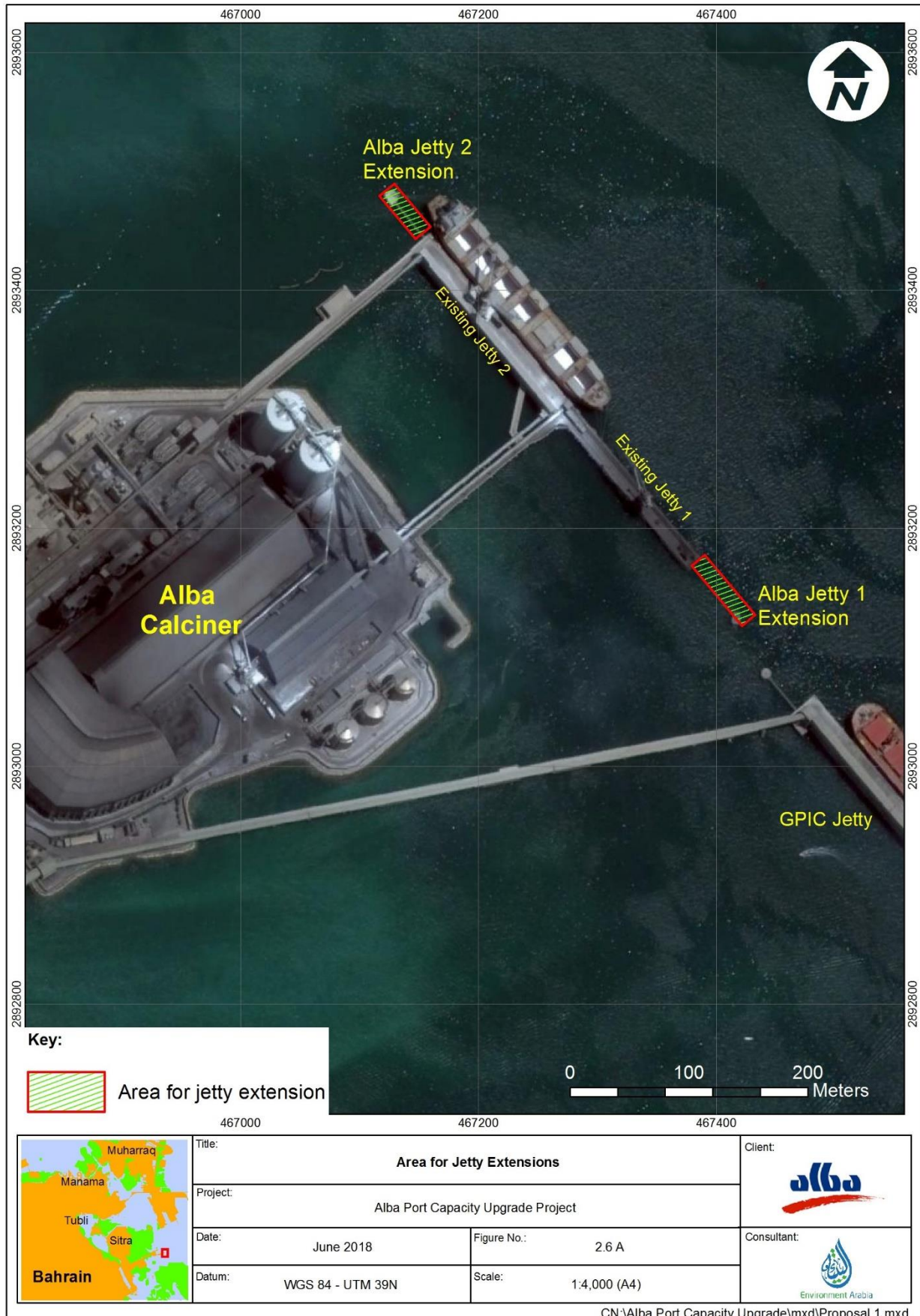
3.3.2 Proposed Infrastructure

The information provided below is based on the technical documentation provided by the EPC Contractor FATA, Document No. R5707, Rev. 0, 15.3.18.

Under the preferred solution, Jetty 2 will be extended towards the existing dolphin by 37.5m and a new ship unloader will be placed on the extension. This means that two ship unloaders will offload alumina simultaneously, thus reducing unloading time from approximately 6 days to 2-3 days. Jetty 1 will be extended by 65 m and will be dedicated to GPC, CPC and Liquid Pitch. New storage silos and conveyors will also be provided. Figure 2.6 A is an image of the proposed infrastructure.

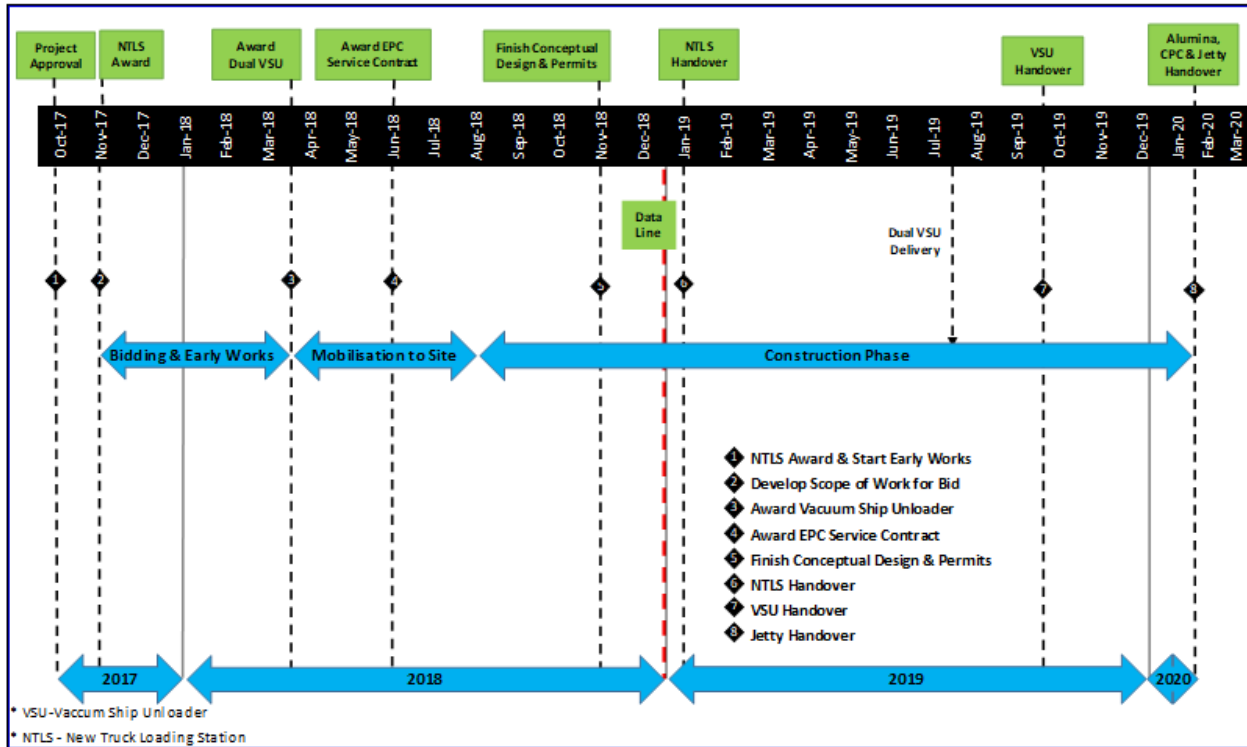
As part of the Port, the existing grab, which offloads GPC on Jetty 1 and the associated conveyor will be upgraded in order to minimise the potential for the fugitive release of dust emissions during ship offloading.

The design will conform to the requirements of the International Organization for Standardization, European Federation of Materials Handling, British Standards and International Electrotechnical Commission standards.



3.4 Project Schedule

The final and approved schedule of the Port is given below.



4 ESIA FOR THE PROJECT

4.1 ESIA

Due to the Port and its activities, there are likely to be environmental impacts and social changes that may require assessment, management, mitigation and monitoring.

National legislation in Bahrain refers to “Environmental Effects Evaluation” and “Environmental Impact Assessment” (EIA). For this report, this is identified as synonymous with the process of ESIA referred to in the international guidance referenced.

The ESIA presents the environmental baseline conditions of the project area and identifies potential impacts on Air Quality, Community Health Safety and Security, Geology and Hydrogeology, Labour and Working Conditions, Marine and Coastal Ecology, Marine Sediment and Water Quality, Occupational Health and Safety, Traffic and Access, Waste Management of the during both the construction and operation phases.

4.2 Scope of the ESIA

Alba appointed Environment Arabia Consultancy Services WLL (EACS) to undertake the ESIA Report for its Port. This chapter constitutes relevant details of the ESIA Report, which was approved by the SCE on 12 December 2018.

Alba invited bids for the Engineering, Procurement and Construction (EPC) of the Port Upgrade Project and a preferred contractor – FATA in cooperation with Reel Alesa and KHome International - was selected in April 2018. This ESIA has been prepared based on the preferred contractor’s design and construction proposals for the Port.

The ESIA has taken into consideration the construction (including commissioning) and operations of the Port.

4.3 Publication of the ESIA

This ESIA Report for the Port has been published on the Alba website (www.albasmelter.com).

4.4 Legal Requirement for ESIA

The ESIA is to be undertaken in accordance with ‘Ministerial Order No. 1 of 1998 with Respect to the Environmental Evaluation of Projects’. In Bahrain, the ESIA process results in the preparation of a report, which provides a review and assessment of all activities and potential significant impacts related to the project.

The objectives of the ESIA are:

- To aid in the decision-making process by providing a systematic assessment of the environmental implications of the proposed project, and possible alternatives (e.g. techniques, methods) before a decision is made.
- To identify adverse and beneficial impacts of the development during construction and operation.
- To recommend mitigation measures and formulate an action plan for any adverse impact that will arise as a result of the development.

4.5 Planning and Land Use

The consideration of existing land use and planning policies within environmental assessment is important to facilitate the assessment of impacts. This section presents details of the surrounding land uses and future development in the area as set out in the Bahrain National Plan 2030.

4.5.1 Description of Land Use

Figure 4.1 presents the land use mapping. The Sitra Marine Terminal is shared between Alba, Bapco, GPIC and Banagas. There are pipelines along the Terminal which transfer products from Bapco's Sitra Tank Farm to the Terminal for export. The Tank Farm is located approximately 4.5 km west of the Terminal. As part of their Central Gas Plant-III project, Banagas plans is currently expanding its storage facilities on the Terminal.

To the north of Sitra Marine Terminal a new terminal is planned to be constructed on recently reclaimed land. This project is being led by NOGA. Adjacent to the new terminal, there is a large reclamation plot 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.

It is understood that it is Bapco's intention to locate a temporary construction labour camp on the NOGA plot specifically for the Bapco Modernization Programme. This site will house up to 15,000 workers and could be occupied by the start of 2019, with numbers gradually increasing over a period of two years. Bapco also plan to construct some new tanks and sealines in the vicinity of the Port.

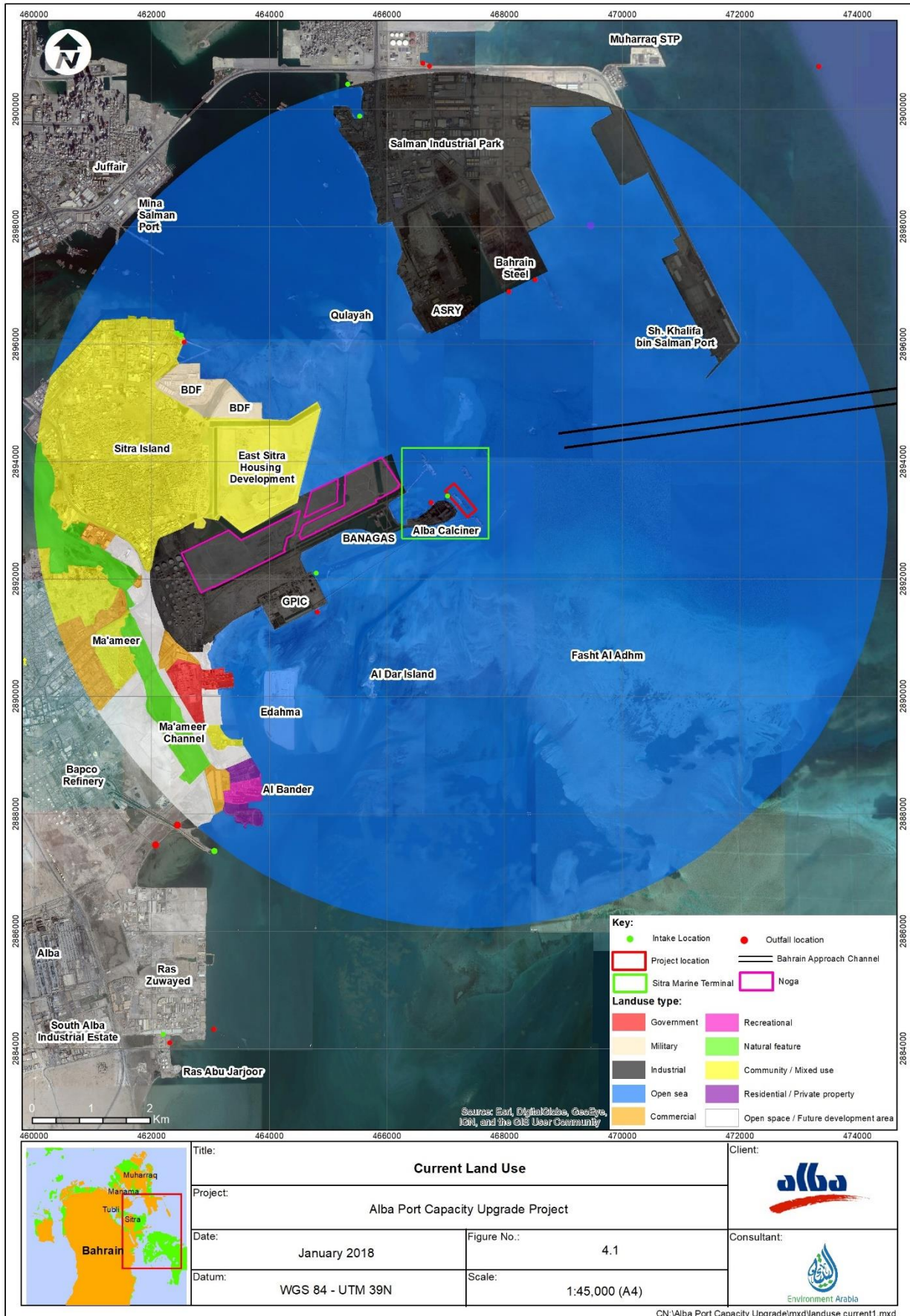
To the south west of the Sitra Marine Terminal there is a reclamation plot which belongs to Edahma which is understood to be for industrial purposes. Adjacent to this to the east is the popular tourist resort of Al Dar Island. To the south west is the resort of Al Bandar and the Bahrain Yacht Club. There are many recreational vessels in this area. Also along this stretch of coast is Sitra Fisherman's Port. Commercial fishing dhows and smaller fishing boats operate from this Port, together with boats taking passengers to Al Dar Island.

Between Sitra Port and the Al Bandar Resort is the Sitra Coastguard Headquarters. They have a fleet of boats which are moored in a purpose-built harbour and jetty.

Approximately 3.5 km to 4 km to the north lies the Arab Shipbuilding and Repair Yard (ASRY) and the Bahrain Steel plants.

Several outfalls can be found at a number of industrial plant in the study area, e.g. discharges from Bapco, GPIC, Bahrain Steel, Ras Abu Jarjoor Desalination Plant and the Mariculture Centre. Bapco, GPIC and the Calciner plant have marine intakes.

EACS has been advised by Bahrain's Electricity and Water Authority (EWA) that the Ras Abu Jarjoor desalination plant is planning on having a seawater intake in the future. Considering the relatively small scale marine works that will be undertaken and the fact that the desalination plant is approximately 10.7 km away from the Port and therefore outside the AOI, this facility has not been identified as a potential sensitive receptor. No impacts are predicted on this facility.



.5.2 Construction Laydown Area

The Construction Laydown Area (CLA) will be located on vacant land within Alba's marine terminal (Figure 2.9) and there will be smaller storage sites located adjacent to the worksites. The CLA will be used for the storage of materials, some pre-assembly works and storage of waste.

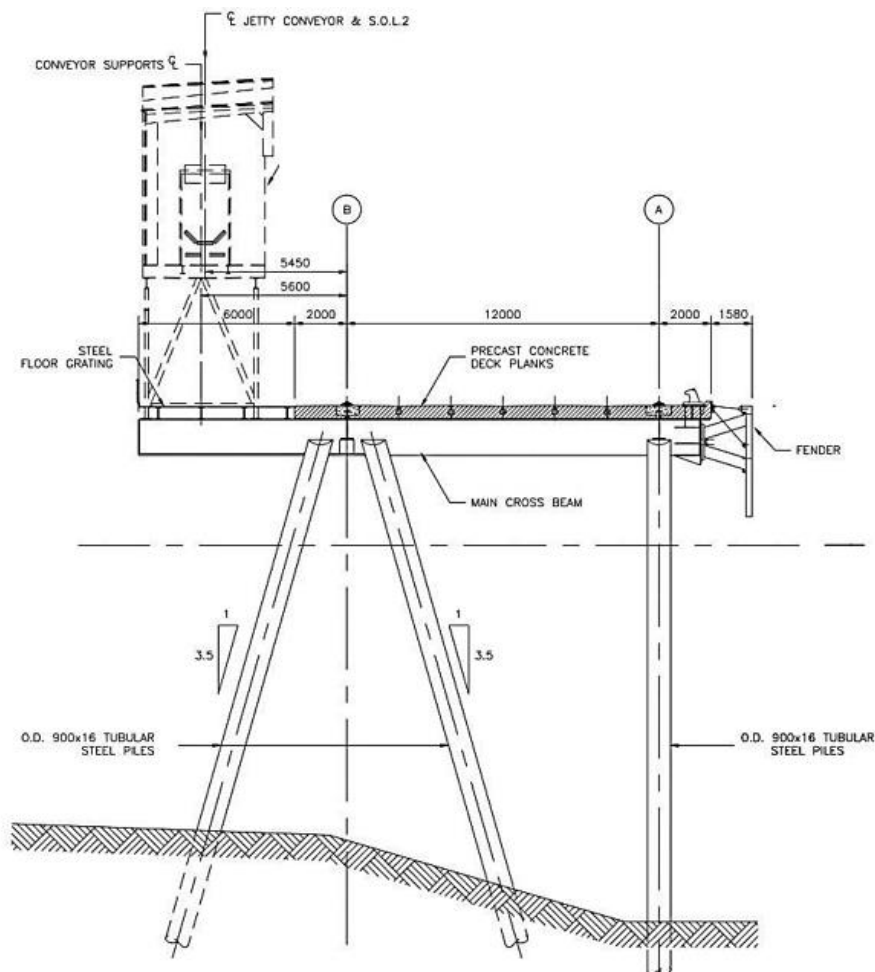


Figure 2.9

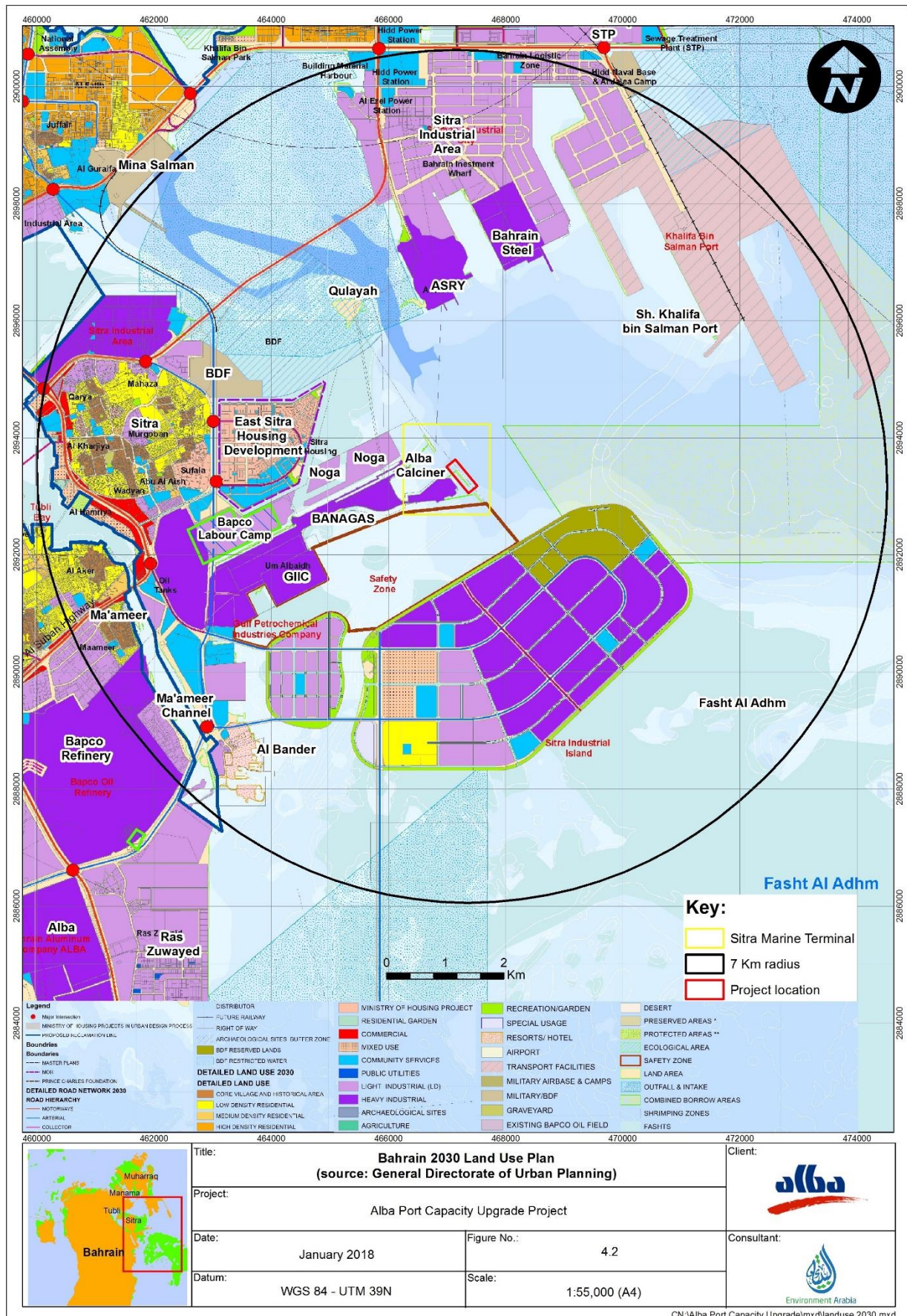
4.5.2 Bahrain National Land Use Plan

In line with the Bahrain 2030 National Planning and Development Strategy (NPDS), the Urban Planning and Development Authority (UPDA) (formerly the General Directorate of Urban Planning) has produced the National Detailed Land Use map (NDLU) (05 February 2016). 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).

Figure 4.2 presents the 2030 National Plan land use designations in the vicinity of the Port. The Port is located at the eastern end of the Sitra Marine Terminal adjacent to the calciner plant. It is designated as 'heavy industry' in the Bahrain 2030 National Plan. This designation extends to its immediate neighbours of GPIC and Bapco (Sitra Storage Tank Farm). There is limited existing land use surrounding the Port, but the National Plan shows that significant future reclamation is proposed to the south for industrial purposes.

To the immediate north west, there is a land designated as 'light industrial' in the Plan. This land consists of land reserved for storage tanks for NOGA and for an expansion of GPIC. Approximately 2.5 km to the west of the end of Jetty 2, is the residential area of East Sitra, a recently reclaimed island belonging to the Ministry of Housing.

Approximately 3 km to the north are the Arab Shipbuilding and Repair Yard (ASRY) and Bahrain Steel. These are both designated as heavy industry in the National Plan. 5 km to the northeast is the Khalifa bin Salman Port. 1.5 km to the east of the Port, are the western limits of an approved Government borrow-area.



4.6 Potential Area of Influence (AOI)

The significance of the potential impacts of the Port have been evaluated by compiling relevant information on the existing characteristics of the environment (i.e. the 'baseline'). Through data collation from the current Alba operations, consultation, desk study (i.e. literature review and comparison to Gulf/Bahrain/international/industry standards) and select specialist studies, an evaluation of the severity of each impact will be made by assessing the likely effects and implications with reference to the baseline situation.

The Port's Area of Influence (AOI) has been 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.

4.6.1 Identification of Potential Sensitive Receptors - ESIA

Eighteen potential sensitive receptors have been identified within the 7 km study area for the Port. These include nearest residential areas, recreational facilities, and the industrial neighbours to the Alba Port (**Table A**).

Table A: Potential Sensitive Receptors

No.	Potential Sensitive Receptor	Type	Approx. Distance (km) (from centre of existing Alba jetties)
1	Sitra Residential Area	Residential	4.5
2	East Sitra Housing Development	Residential	2.8
3	Bapco Sitra Tank Farm	Industrial	4.7
4	Bapco Jetty	Industrial	0.2
5	GPIC Jetty	Industrial	0.3
6	GPIC Plant	Industrial	2.8
7	Alba Calciner Plant Water Intake	Industrial	0.2
8	Bapco Labour Accommodation (Future)	Residential	3.6
9	Ma'ameer Village	Residential	6.5
10	Sitra Port	Commercial	5.0
11	Al Bandar Resort	Recreational	6.0
12	Bahrain Yacht Club	Recreational	6.1
13	Bapco Intake	Industrial	7.3
14	Al Dar Island	Recreational	3.4

No.	Potential Sensitive Receptor	Type	Approx. Distance (km) (from centre of existing Alba jetties)
15	Fasht Al Adhm	Ecological	1.4
16	Bahrain Approach Channel	Commercial	1.5
17	Shaikh Khalifa bin Salman Port	Commercial	5.0
18	Marine Environment	Ecological	

Table B provides a matrix showing which of the sensitive receptors have the potential to be influenced by the Port. The horizontal axis shows the environmental parameters and the vertical axis lists the sensitive receptors. Where ESIA parameters do not have a defined spatial impact, or spatial impact outside of the project site areas they have not been included in Table B.

Table B: Matrix of AOI Against ESIA Parameters

No.	Name	ESIA Parameter						
		Air	Community, Health, Safety and Security	Marine and Coastal Ecology	Marine Sediment and Water Quality	Occupational Health and Safety	Soil and Groundwater	Traffic and Access
1	Sitra Residential Area	√	√					√
2	East Sitra Housing Development	√	√					√
3	Bapco Sitra Tank Farm					√		√
4	Bapco Jetty	√				√		
5	GPIC Jetty	√				√		
6	GPIC Plant					√		√
7	Alba Calciner Plant Water Intake				√			
8	Bapco Labour Acc	√	√					√
9	Ma'ameer Village	√	√					√
10	Sitra Port		√			√		√
11	Al Bandar Resort		√		√	√		√
12	Bahrain Yacht Club		√		√	√		√
13	Bapco Intake				√			
14	Al Dar Island		√		√			
15	Fasht Al Adhm			√	√			
16	Bahrain Approach Channel					√		
17	Shaikh Khalifa bin Salman Port					√		
18	Marine Environment			√	√			

No.	Name				ESIA Parameter			
		Air	Community, Health, Safety and Security	Marine and Coastal Ecology	Marine Sediment and Water Quality	Occupational Health and Safety	Soil and Groundwater	Traffic and Access
19	Ras Abu Jarjoor Intake (future scenario)				√		√	

5 STAKEHOLDER IDENTIFICATION AND PRIORITISATION

5.1 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 the ESIA parameters, the Project’s features, potential degree of impact and interest in the Project and their relation in terms of how they will be impacted by the Project.

5.2 Stakeholder Categories and Identification

Each of the stakeholder groups have been discussed in detail below. The list of stakeholders are likely to change in composition as the Port progresses through the stages of construction, operation and closure.

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

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 Port in terms of establishing policies, granting permits or other approvals and monitoring and enforcing compliance with Bahrain Laws. A large number of Government agencies were consulted about the Port during the ESIA, hence this group already has a high knowledge of the Port.

Stakeholder	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Agricultural Affairs and Marine Resources	H	L	S
Agricultural, Engineering and Water Resources Directorate	H	L	S
Bahrain Authority for Culture and Antiquities	L	L	S
Capital Municipality	H	L	S/L
Central Planning Office	H	L	S/L
Council of Representatives	H	L	S/L
Electricity and Water Authority	H	L	S/L
General Directorate of Civil Defense	L	L	N
General Directorate of Traffic	H	H	S/L
Ministry of Housing	L	L	N
Ministry of Industry and Commerce	H	H	S/L
Ministry of Interior	H	L	S/L
Ministry of Transportation and Telecommunications	H	H	S
National Oil and Gas Authority	H	H	S/L
Roads Directorate, MWMAUP	H	H	S/L
Supreme Council for Environment	H	H	S/L
Supreme Council for Women	L	L	N
Shura Council	H	L	L
Southern Governorate	H	L	S/L
Southern Municipal Council	H	L	S/L
Sanitary Engineering Affairs	H	L	N
Ports and Maritime Affairs	H	H	S/L
Coast Guard	H	L	N
Urban Planning and Development Authority	H	L	S/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 Port's E&S aspects.

Stakeholder	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Bahrain Environment Society	L	L	N
Bahrain Women's Union	L	L	U
Bahrain Women's Association	L	L	U
Disabled Services Center	L	L	U
Environment Friends Society	L	L	U
Migrant Workers Protection Society	M	M	N
Professional Fishermen's Society	L	M	N
Sitra Fishermen's Society	L	M	U
Sitra Charity Organization	L	L	U
Sitra Community Centre	L	L	U
Sitra Society for the Advancement of Women	L	L	U

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. Given below are the top media outlets and agencies through which Alba disseminates information.

Name	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Akhbar Al Khaleej	H	L	S/L
Alayam	H	L	S/L
Albilad	H	L	S/L
Alwatan	H	L	S/L
Gulf Daily News	H	L	S/L
Daily Tribune	H	L	S/L
Gulf Industry	H	L	S/L
Bahrain News Agency	H	L	S/L
Trade Arabia	H	L	S/L
Bloomberg	H	L	S
Reuters	H	L	S

Local Communities: This refers to the inhabitants of the immediate and surrounding area of the Port 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	L	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	L	L	N

Local Businesses: Key stakeholders in this category are Bapco, Banagas and GPIC, with neighbouring property to the Alba Port. There are other local businesses along the access road to and from the Port to the Smelter.

Stakeholder	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Um al Saad Avenue			
2000 Marine Stores	L	L	U
A.Aziz Khalil Ceramic	L	L	U
Al Bandar	L	L	U
Al Dar	L	M	U
Almoayyed Motors	L	L	U
Al Shehab Ceramica	L	L	U
Atlas Industrial Suppliers	L	L	U

Stakeholder	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Bahrain Livestock	L	L	U
Bahrain Yacht Club	L	L	U
Banagas	H	H	S/L
Bapco	H	H	S/L
Bin Hindi Motors	L	L	U
Bokhammas Centre	L	L	U
Dream Group	L	L	U
E.A.Juffali & Brothers for Technical Equipment Company	L	L	U
ELAMES	L	L	U
First Motors	L	L	U
GPIC	H	H	H
Jaffar Ali Al-Mabad Est.	L	L	U
Jawad Al Moghanni Est.	L	L	U
Magellan Marine	L	L	U
NASS Contracting	H	M	U
Nasser Abd Mohammed Co.	L	L	U
National Finance & Exchange Co. W.L.L.	L	L	U
Premier Motors	L	L	U
Sayed Saleh Trading Est.	L	L	U
Seamax Crafts	L	L	U
Seaworld	L	L	U
Security Division of Ebrahim E.K. Kanoo Group	L	L	U
Tasheelat Automotive	L	L	U
UNITED	L	L	U
Industrial Area			
Access Arepro	L	L	U
Adani Group	L	L	U
Al Bustani Logistics and Warehousing	L	L	U
Al Darwish Ceramics	L	L	U
Al Hassanain	L	L	U
Bahrain Stainless Steel	L	L	U
Dawani Properties	L	L	U
Kooheji Home	L	L	U
Ramsis Engineering	L	L	U
Temco	L	L	U
Yousif Kawoosh Contracting	L	L	U

Vulnerable Groups: For the Project, vulnerable people are those individuals or groups within the Project's area of influence who could experience adverse impacts from the activities of the Project more severely than others. For the Project, two vulnerable groups have been identified: migrant workers and fishermen.

Stakeholder Category	Impact on the Project	Impacted by the Project	Level of Knowledge about the Project
Migrant Workers	L	L	U
Fishermen	L	L	U

6 STAKEHOLDER ENGAGEMENT

6.1 Introduction

Alba is committed to engaging its stakeholders through an open and culturally appropriate approach to information disclosure.

6.2 Stakeholder Principles

Alba's SEP is based on the Company's HSEMS, Code of Conduct and IFC's best practices. 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 on the basis of timely, relevant, understandable and accessible information; and
- Allows access to Alba's Grievance Mechanism to voice their concerns and seek feedback.

6.3 Stakeholder Engagement to 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.

The Port stakeholder engagement process commenced during production of the Environmental and Social Scoping Report. The purpose of these consultations was to identify possible interactions and constraints in respect of other planned development programs and projects and to identify possible environmental constraints of the Port. Furthermore, early engagement with key stakeholders allows any concerns to be identified at an early stage in the project planning.

A list of the organisations that have been consulted with is provided the below, including the contact name and a summary of any responses received to date.

Organisation	Main Contacts	Notes
Agricultural Affairs and Marine Resources (AAMR)	Sheikh Khalifa bin Isa Al Khalifa Undersecretary Agricultural Affairs and Marine Resources	<ol style="list-style-type: none"> 1. Screening Form submitted to the AAMR for dredging. 2. Follow-up email on 8.1.18 to Bassam Al Showaikh (Fisheries Officer) explaining the four options under consideration. 3. Meeting held 1.4.18 to present options to fisheries directorate.

Organisation	Main Contacts	Notes
		4. No dredging or reclamation now proposed, so update letter sent on 30.5.18 explaining preferred scheme.
Agriculture, Engineering and Water Resources Directorate (AEWRD)	Sheikh Khalifa bin Isa Al Khalifa (Undersecretary) Ali Hameed Al-Shabaani (Acting Director) Marcial A. Mojica (Senior Hydrogeologist)	1. Screening form for reclamation and dredging submitted on 4.1.18. 2. Meeting held on 22.1.18. 3. The AEWRD stated that the aquifer is approximately 30m deep in the area and so they don't anticipate any problems concerning protection of the aquifer. 4. All applications for permits must be related to chart datum. 5. They requested a copy of the geotechnical survey. 6. Letter sent explaining the preferred option on 28.5.18.
Bahrain Authority for Culture and Antiquities	Sheikh Khalifa bin Ahmed Al Khalifa (Director, Directorate of Archaeology & Museums)	1. Consultation letter sent on 4.1.18. 2. There are no heritage assets in study area. 3. Letter from BACA. 4. Letter sent explaining the preferred option on 28.5.18. 5. Email received on 3.6.18 stating that the BACA has no comments on the project.
Bahrain Environment Society	Dr. Shubar Al Wedaie	Consultation letter sent on 30.5.18.
Bahrain Fisherman's Society	General Manager	Consultation letter sent on 30.5.18.
Bahrain Company (Banagas) Gas	Prasad Kondaramvalappil (Acting Superintendent – HSE)	1. Consultation letter sent on 4.1.18. 2. Meeting held on 7.2.18. Items discussed: <ul style="list-style-type: none"> Alba will have no impact on Banagas facilities. Banagas interested in obtaining information on emergency scenarios. Banagas interested in knowing whether there is any heavy equipment on haul road and where the laydown area will be. Banagas want to know expected vehicle movements.

Organisation	Main Contacts	Notes
		<p>3. Letter sent explaining the preferred option on 28.5.18.</p> <p>4. Request for information from Banagas received on 5.6.18. Alba liaising directly with Banagas through stakeholder engagement programme.</p>
Bahrain Petroleum Company (Bapco)	Ijaz Ashraf (Advisor Environmental Affairs)	<p>1. Consultation letter sent to Bapco by Noga Holding.</p> <p>2. Alba is holding regular discussions with Bapco in the Project Co-ordination meetings, but for the ESIA a meeting was held on 15.2.18.</p> <p>3. Bapco wanted information regarding black dust coming from the jetty during unloading.</p> <p>4. Bapco requested a plan showing the locations for the geotech survey.</p> <p>5. Bapco requested a copy of the RA and MS for the jetty construction.</p> <p>6. Bapco want to be involved in the ship simulation.</p> <p>7. Further information is provided in the Minutes.</p> <p>8. Letter sent explaining the preferred option on 28.5.18.</p> <p>9. Letter sent on the findings from the vessel simulation study conducted on Alba's north jetty by PSA Marine in Singapore on 19.12.18.</p>
Bahrain Women Society	Mona Al Alawi Head of Bahrain Women Council	Consultation letter sent on 29.5.18.

Organisation	Main Contacts	Notes
Central Planning Office (CPO), Ministry of Works	Dominic McPolin (Chief Executive Officer)	<ol style="list-style-type: none"> 1. Consultation letter sent on 4.1.18. 2. Meeting held on 30.1.18. 3. EACS should take into account the results from the EIA undertaken for the Calciner plant. 4. Alba's smelter is at high risk from other projects in the area. 5. The proposed East Sitra Link Road will affect Alba's haul road. The CPO requested data regarding the need for a conveyor to convey raw materials to the smelter from the Port. They will open discussions with concerned stakeholders. 6. There are increased traffic demands in the area which are placing a strain on the existing network including Avenue 96 and King Hamad Highway. 7. The road works at Alba and Nuwaidrat roundabouts are running 2 years behind schedule. 8. EWA are planning a seawater intake at Ras Abu Jarjoor – this needs to be included in the study. 9. The BDF want to dredge two areas in the vicinity of the Port. Alba should contact Brigadier General Abdulaziz for a meeting. 10. Letter sent explaining the preferred option on 28.5.18.
Council of Representatives	Abbas Al Madhi Head of Services Committee	Consultation letter sent on 30.5.18.
Electricity and Water Authority (EWA)	Shaikh Nawaf Bin Ebrahim Bin Hamad Al Khalifa (Chief Executive Officer)	<ol style="list-style-type: none"> 1. Consultation letter sent on 4.1.18. 2. Meeting held on 14th February 2018. 3. EWA welcomed the consultation and asked to be further consulted with regard to selection of monitoring locations during any required reclamation and dredging. 4. Letter sent explaining the preferred option on 28.5.18. 5. Meeting held on 11.6.18.

Organisation	Main Contacts	Notes
		6. Letter sent explaining Project additional electrical load requirement on 12.08.18 7. Letter sent requesting the assistance from EWA Planning & Project Team to conduct an in-depth survey on 16.09.18 8. Letter sent providing EWA with the additional electrical load requirements for the project on 10.10.18 9. Letter received from EWA on Alba's additional power requirement on 18.10.18 10. Letter sent explaining Alba's feedback after the site inspection done inside ALBA HTS9 substation on 05.12.18
Environment Friends Society	Khawla Al Muhanadi	Consultation letter sent on 30.5.18.
General Directorate of Civil Defence	Bassam Khalaf (Head of Protection and Safety)	1. Consultation letter sent on 4.1.18. 2. Consultations will continue with this Directorate by Alba when necessary. 3. Letter sent explaining the preferred option on 28.5.18.
Gulf Petrochemical Industries Company	Yasser A.Rahim Alabbasi (Plant Operation Manager)	1. GPIC are part of the Project Co-ordination meetings, which are regularly held. 2. Specific introduction meeting held on 16.1.18. 3. The meeting notes are extensive. 4. Letter sent explaining the preferred option on 28.5.18.
Migrant Workers Protection Society	Marietta Dias Chairperson	Consultation letter sent on 29.5.18.
Ministry of Housing	Dr Fattah Abbas (Senior Project Manager, Special Projects)	1. Consultation letter sent on 4.1.18. 2. Meeting held 21.1.18. 3. MoH welcomed early engagement and were interested in the option selection process. They provided a map showing the recently reclaimed areas close to Alba. 4. Dialogue is to be maintained to allow sharing of information on the construction of both the East Sitra Housing Plot and the jetties. 5. Letter sent explaining the preferred option on 28.5.18.

Organisation	Main Contacts	Notes
		<p>6. East Sitra Masterplan sent to EACS on 12.6.18.</p> <p>7. Email received on 31.5.18 stating the project is not anticipated to have an impact on the East Sitra Housing Plot.</p>
Ministry of Industry and Commerce (MICT)	Yasser Alawi AlMahfoodh (Chief Engineering Services)	<p>1. Consultation letter sent on 4.1.18.</p> <p>2. Meeting held on 15.1.18.</p> <p>3. The MICT understand the importance of the Alba Expansion Project and the need to upgrade the Port and has no objection in principle to this project. There are no industrial areas belonging to the Ministry close to the Project; North Sitra Industrial Area is located to the north of Sitra Island.</p> <p>4. The MICT requested a copy of the ESIA when complete.</p> <p>5. Letter sent explaining the preferred option on 28.5.18.</p>
Ministry of Municipalities Affairs and Urban Planning (Urban Planning and Development Authority)	Rashid Al Saad (Deputy CEO)	<p>1. Consultation letter sent on 4.1.18.</p> <p>2. Meeting held on 8th February 2018.</p> <p>3. UPDA stated that the coordinates for the project should be sent to them and recommended that Alba applies for the project to be designated as a Strategic Project.</p> <p>4. The UPDA are interested in Alba building a conveyor to transport alumina and CPC to the smelter and wish to open a dialogue with the relevant parties.</p> <p>5. Letter sent explaining the preferred option on 28.5.18.</p>
Ministry of Transport and Telecommunications (MTT)	Didar Dalkic (Advisor to the Minister)	<p>1. Consultation letter sent on 4.1.18.</p> <p>2. Meeting held 24.1.18.</p> <p>3. The MTT stated that the project does not affect them in any way and they have no concerns or objections.</p> <p>4. The MTT are developing proposals for the Bahrain link of the GCC railway. They would be keen to talk to Alba regarding any potential use of this rail link by Alba.</p> <p>5. Letter sent explaining the preferred option on 28.5.18.</p>

Organisation	Main Contacts	Notes
NOGA	Nasser Al Bin Ali	NOGA are a part of the Project Co-ordination Meetings that are regularly held.
Nogaholding	Dr Dafer Al Jalahma (Chief Executive)	<ol style="list-style-type: none"> 1. Consultation letter sent on 4.1.18. 2. As the holding company for oil and gas assets owned by the Government of Bahrain, Nogaholding distributed the consultation letter to concerned stakeholders and assisted with setting up meetings.
Ports and Maritime Affairs (PMA)		<ol style="list-style-type: none"> 1. Consultation letter sent on 4.1.18. 2. Meeting held 25.1.18. 3. The PMA needs to know that all other stakeholders are happy with the project proposals before they can approve the project. 4. Regular meetings are held as part of the Project Coordination meetings. 5. Letter sent explaining all meeting and simulation finding with regards to Alba jetty extension on 28.03.19. 6. No objection letter received from PMA on 04.04.19
Roads, Planning & Design Directorate (RPDD), Ministry of	Huda Fakhroo (Assistant Undersecretary)	<ol style="list-style-type: none"> 1. Consultation letter sent on 4.1.18. 2. Response received on 22.1.18 outlining the RPDD's plans for the East Sitra Link Road. 3. Route provided for ESLR on 13.5.18. 4. Letter sent explaining the preferred option on 28.5.18
Sanitary Engineering Planning and Projects Directorate (SEPPD), Ministry of Works	Asma Murad (Acting Assistant Undersecretary)	<ol style="list-style-type: none"> 1. Consultation letter sent on 4.1.18. 2. Response received on 22.1.18. The SEPPD stated that there are no conflicts between the Alba Port Project and their projects in the area. 3. Letter sent explaining the preferred option on 28.5.18.
Shura Council	Ali Saleh Al Salah Head of the Shura Council	Consultation letter sent on 30.5.18.
Southern Governorate	Shaikh Khalifa bin Ali Al Khalifa (Governor)	<ol style="list-style-type: none"> 1. Consultation letter sent on 12.1.18. 2. Letter sent explaining the preferred option on 28.5.18.

Organisation	Main Contacts	Notes
Southern Municipal Council	Ahmed Yusif Al Ansari Head of the Municipal Council	Consultation letter sent on 29.5.18.
Southern Municipality	Asim Bin Abdul-Latif General Director	Consultation letter sent on 29.5.18.
Supreme Council for Environment (SCE)	Luma Abbas Al Mahroos (Head of Environmental Assessment)	<ol style="list-style-type: none"> 1. Meeting held on 11.12.12. 2. Screening forms EA-2, EA-4 and EA-6 submitted on 7.1.18. 3. WMP and Emergency Plan sent on 11.2.18. 4. Meeting held on 12.3.18. 5. Scoping Report submitted on 21.3.18. 6. Response to Scoping Report received from the SCE on 29.5.18, which stated that the consultant should proceed with the EIA. 7. ESIA Report submitted on 05.07.18 8. Conditions letter received from the SCE on 12.12.18
Supreme Council for Women	Shaikha Deena Bin Rashid Al Khalifa Head of International and National Relations	Consultation letter sent on 29.5.18.

6.4 Alba Sustainability Report

Alba reports and discloses the E&S impacts of its daily operations as well as sustainability initiatives in a transparent manner through its Annual Sustainability Report.

The Annual Sustainability Report relates to Alba's existing facilities located in Bahrain, which includes five production potlines, four power stations, three carbon plants, two cast houses and four desalination plants, coke calciner plant, and a marine terminal with jetty facility. It also includes information about the Line 6 Expansion Project (potline 6 and Power Expansion Project).

The Company issued its first Sustainability Report in 2016, which included all its operations and activities located in the Kingdom of Bahrain for the period 1 January 2016 to 31 December 2016.

The Sustainability Report is prepared in accordance with the Global Reporting Initiative (GRI) Standards: Core Option (G4 Guidelines). GRI is an international independent organisation that helps businesses, governments and other organisations understand and communicate the impact of business on critical sustainability issues such as climate change, human rights, corruption and many others.

6.6 Stakeholder Engagement Techniques

To engage with its various stakeholder groups, Alba will employ a variety of tools and techniques relevant to the stakeholder groups for the 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	Stakeholder Exhibitions Meeting
Correspondence by phone/email/Text/Instant messaging/Letters	Invite stakeholders to meetings
Press Releases	Distribute Port information to government officials, organisations, agencies, companies, local communities and general public
Formal meetings	Present project information to a group of stakeholders
	Allow the group of stakeholders to provide their views and feedback
	Distribute technical documents
	Facilitate information dissemination using PowerPoint presentations, posters, models, videos and pamphlets or project information documents
	Record discussions, comments/questions raised and responses

6.7 Alba SEP Table

Alba has detailed its engagement approach with the various stakeholder categories in the below SEP Table. It sets out the approach to implement a robust engagement programme with all the different categories of stakeholders in accordance with National laws and regulations and IFC Performance Standards and Equator Principles III - June 2013. This SEP takes into consideration and activities undertaken to date.

Topic	Objective(s) of Engagement	Stakeholder Group(s)	Method(s) of Engagement	Frequency of Engagement
Regulatory Reporting	To meet the requirements derived from Bahrain National laws and regulations that apply to stakeholder engagement for the Project	Government of Bahrain and various authorities	Regular meetings Periodic Reports Site Visits Periodic Audits Permits and Approvals Contracts Official Correspondences	Regularly, as required
Sustainability Reporting	To report and assess the impacts of wide range of E&S impacts caused by everyday activities To increase transparency and accountability To present Alba's values and governance model	General Public, Stakeholders and Shareholders	Sustainability Report	Annual
		Alba Employees	Correspondence by e-mail and/phone	As required
Lender Reporting	To report on the planning and construction phases of the Port To update on Alba and its contractors' and sub-contractors' compliance or other E&S Requirements	Lenders & ECAs	Periodic Audits & Reports Periodic Site visits	Every 6 months during the construction phase and once a year during the operation phase As required

Financial Reporting	To give information about Alba's activities and financial performance	General Public, Shareholders, and Stakeholders Media	Annual Report Press Releases, Media Interviews Newspaper articles, website	Annual As required
ESIA Disclosure	To disclose any ESIA information	General public	Alba Website	Upon SCE Approval
Grievance Mechanism	To create awareness about Alba's external grievance mechanism and ensure that external stakeholders know how to use it	General public Alba Contractors Nearby communities and receptors	Press Releases, Exhibitions Meeting, Alba website Formal Meetings Press Releases, Exhibitions Meeting,	Once-off awareness campaign, then as required Regularly, as required Once-off awareness campaign, as required
Traffic Management	To effectively manage Alba traffic, prevent/mitigate any related impacts, and ensure that stakeholders are aware of their roles and responsibilities	Local businesses Relevant government agency – General Directorate of Traffic	Exhibitions Meeting, Formal Meetings Contracts and Formal Meeting	Once and as required Regularly, as required

		and Ministry of Interior Contractors	Progress Reports,	Regularly, as required
--	--	--	-------------------	------------------------

6.8 Stakeholder Exhibitions Meeting

Alba will hold a Stakeholders Exhibition Meeting (SEM) to disseminate information regarding the E&S impacts of the Port as well as its mitigation and management. The outcomes of this Exhibition will be analysed and used to formulate further stakeholder engagement activities where appropriate.

Alba Port and IR team have partnered with EACS to take this activity forward.

6.9 Highlights of the SEM

The SEM will present simplified summaries of key aspects of the ESIA that can be understood by a layman. These will be presented in a graphic format and will be presented in English and Arabic.

Alba representatives, Port personnel and the environmental consultant will be present during the SEM to give presentations on the Port as well as to answer any queries of stakeholders. All visitors will be given an opportunity to provide verbal and written feedback through the Feedback Form, anonymously if required.

The one-day SEM will be divided into morning and afternoon sessions, wherein:

- 1) Government and media will be invited for the morning session; and
- 2) Local businesses and the General Public will be invited for the evening session.

Full copies of all ESIA documentation and Alba External Grievance Mechanism will be available at the SEM.

6.10 Communications Plan for the SEM

The Communications Plan for the SEM will be finalised once the date for the SEM is approved. This Plan includes advertising, press releases, invitation letters, etc.

6.11 Stakeholder Monitoring and Reporting

Alba will monitor its stakeholder engagement activities based on the above SEP Table and through its internal Stakeholder Engagement Register.

6.12 Final SEP

Alba will issue two versions of the Plan: SEP_Port_PLN_001 comprises the complete plan for the stakeholder engagement for the Port while SEP_Port_PLN_002 will be issued post the SEM.

7 EXTERNAL GRIEVANCE MECHANISM

7.1 Introduction

The Performance Standards of the International Finance Corporation (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.

7.2 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".

7.3 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.

7.4 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.

7.5 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.

7.6 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.

7.7 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 (Annexure 1). 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.

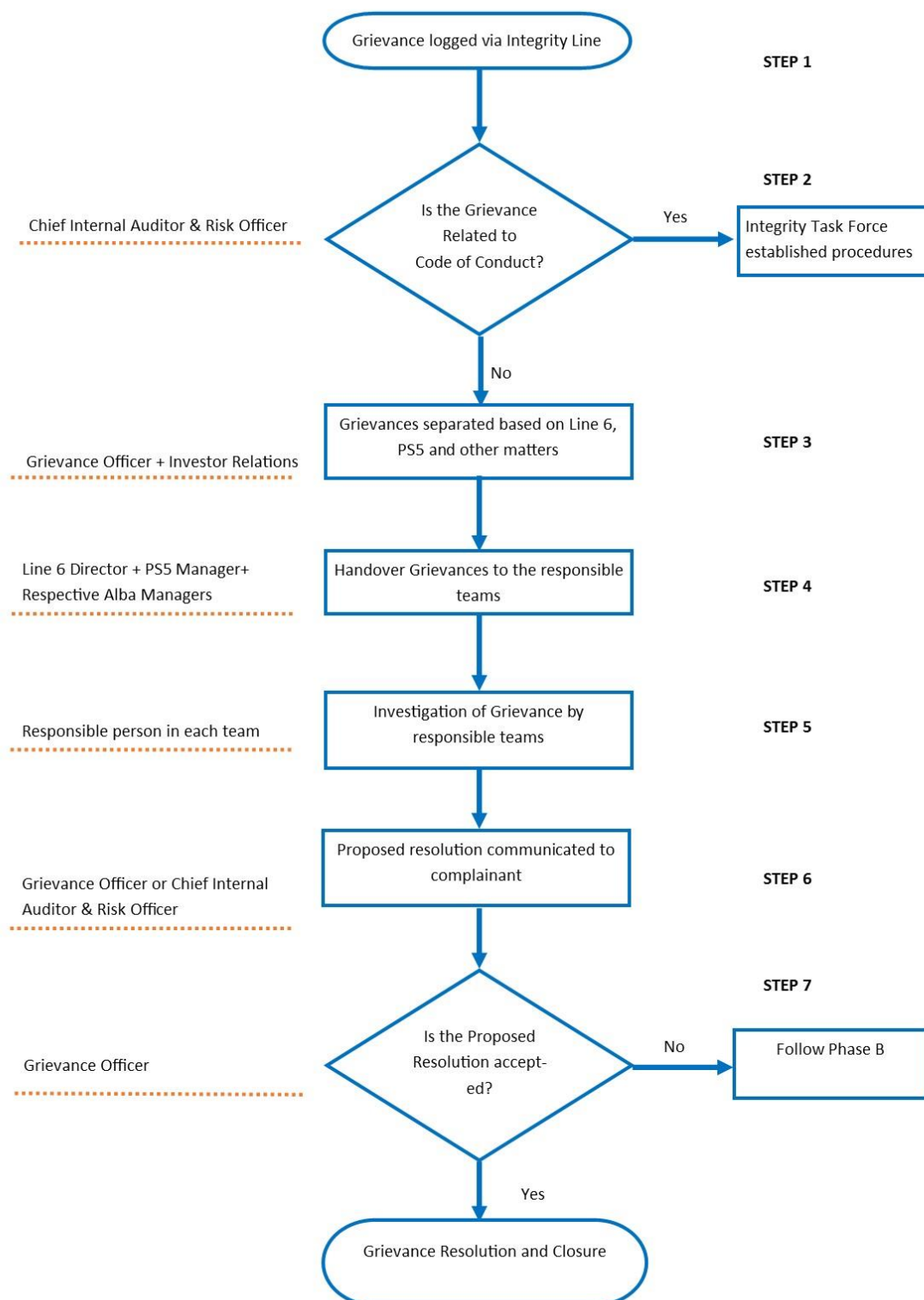
Alba's assigned GO will be the point of contact at all times during the grievance and resolution process.

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.

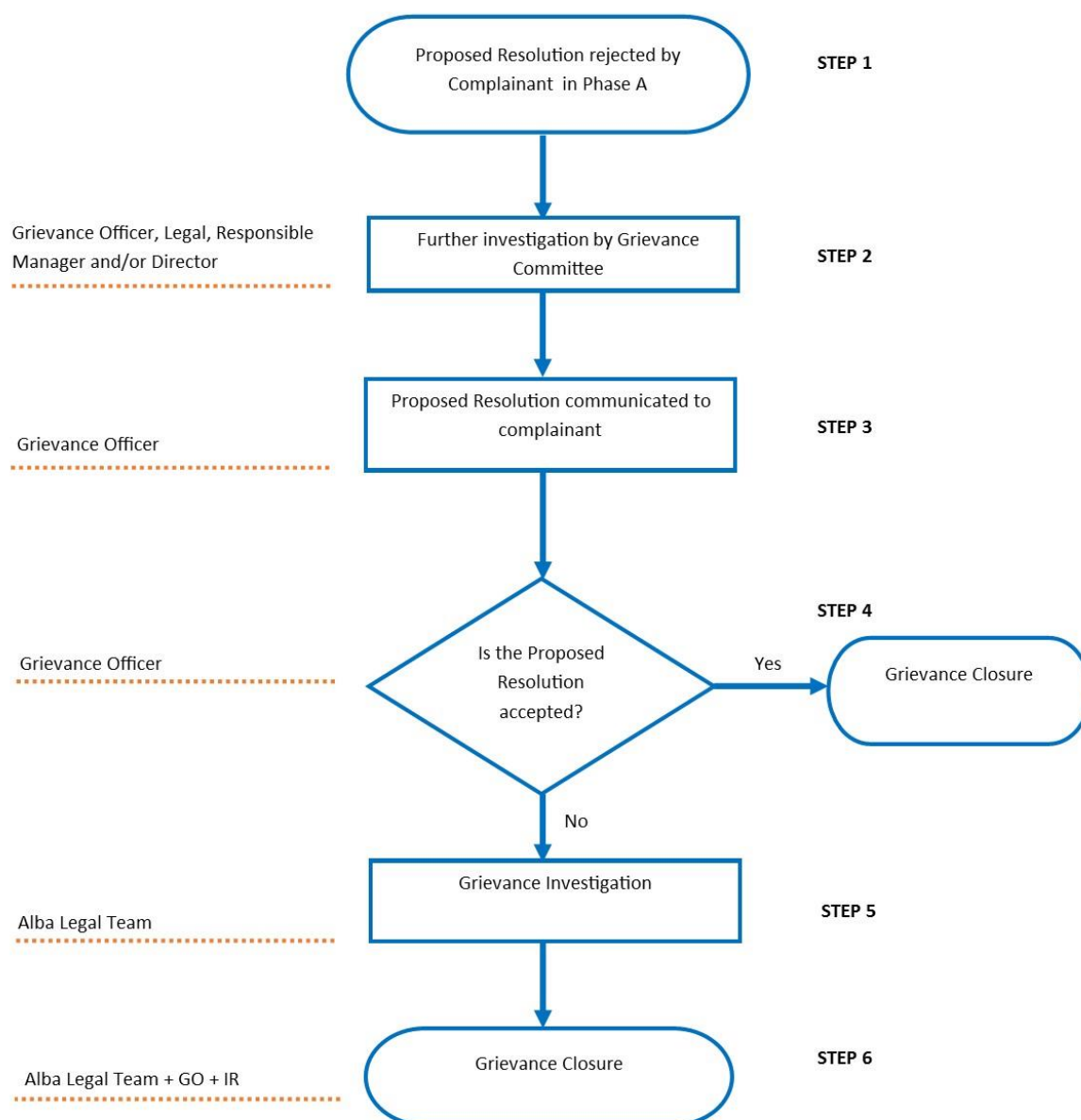
7.8 Process Flow of External GM

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



7.9 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
5	Auditing Grievance Procedure	Bi-annual Report on: Number and % of grievances resolved within the given timeframe Number and % of grievances resolved and/or not yet resolved/still outstanding. Number of % grievances resolved legally Repeat of grievances from the same stakeholder Repeat of the same grievances from several stakeholders	Grievance Register

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

Construction Laydown Area	CLA
Capital Expenditure	CAPEX
Environment and Social Impact Assessment	ESIA
Emergency Response Plan	ERP
Environment and Social	E&S
Environment Impact Assessment	EIA
Environment Arabia Consultancy Services W.L.L	EACS
Front End Engineering Design	FEED
Health, Safety and Environmental Management System	HSEMS
Investor Relations	IR
International Finance Corporation	IFC
Key Performance Indicators	KPI
Project Area of Influence	AOI
Supreme Council for Environment	SCE
Safety, Health & Environment	SHE
Stakeholder Engagement Plan	SEP