

ALUMINIUM BAHRAIN B.S.C. STAKEHOLDER ENGAGEMENT PLAN

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1 INTRODUCTION

1.1 Document Name and Number

The SEP-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).

1.2 Purpose

The positive value of engaging stakeholders affected by development is widely recognised. There is clear evidence that the greater the level of stakeholder engagement, more thorough is the identification of impacts, risks and opportunities.

This SEP is the first formal stakeholder engagement Document of Alba 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). The Line 6 Expansion Project will hereafter be known as the Project.

This Document presents a technically robust and culturally appropriate stakeholder engagement approach that will meet the obligations and expectations of the Company, the Government and the Lenders. The SEP also includes Alba's External Grievance Mechanism for any stakeholders or general public to raise any concerns as well as provide feedback and comments about Alba.

The end goal of this SEP is to build a trusting relationship with the community in which operates and other interested stakeholders based on a transparent and timely supply of information and open dialogue.

1.3 Application

The SEP is a live Document. It will be regularly monitored, reviewed and updated by Alba throughout the life of the Company and various stages of the Project's development, operation and closure.

The requirements set out in this Plan applies to all of Alba's operations as well as contractors, including during and post construction of the Project.

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

1.4 Approvals and Authority

This Document is owned by Alba's Investor Relations (IR) Department.

During the construction and commissioning of the Project, the SEP will be reviewed twice a year by IR Department along with the respective Managers of the Project.

During regular/commercial operations, the SEP will be reviewed every year by IR Department with the respective Managers.

The SEP will be reviewed annually with the Executive Management.

All Request for Changes (RFC) must be addressed to the IR Department, which will be followed up with the Executive Management and 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;
- Provide guidance for stakeholder engagement such that it meets the standards of international best practice requirements of International Finance Corporation (IFC) and Equator Principles;
- Identify key stakeholders that are affected, and/or able to influence Alba and the Project and its activities;
- Identify the most effective methods and structures to disseminate Project information and consult with and gather feedback from affected stakeholders;
- Identify effective stakeholder engagement techniques to address all stakeholders;
- Identify and develop measures to effectively mitigate Environment and Social (E&S) risks that are likely to arise from the Project through stakeholder consultation and engagement;
- Include a formal External Grievance Mechanism plan for stakeholders and public to raise any concerns, provide feedback and comments about Alba; and
- Define and develop a periodical reporting and monitoring measuring system to ensure the effectiveness of the SEP.

1.6 Scope

This SEP covers all Alba operations and contractor activities during the Construction phase of the Project.

1.7 Resources and Responsibilities

While Alba is responsible for the overall stakeholder consultation and engagement, the resources required will change as the Project progresses, thereby requiring an update to the Alba SEP.

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

| Entity | Responsibilities |
|------------------------------------|--|
| IR | <ul style="list-style-type: none"> Owner and accountable for the SEP; Assign a resource to manage the SEP and the External Grievance Mechanism who will: <ul style="list-style-type: none"> i. Oversee stakeholder engagement activities for Supplementary Environment and Social Impact Assessment(ESIA); ii. Manage the implementation and monitoring of social action plans related to the SEP; and iii. Perform monitoring and evaluation to track the progress of the SEP and the External Grievance Mechanism; and iv. Review SEP annually and generate reports for the Executive Management; Draft and disclose annual Sustainability Report; Draft and publish the Annual Report; Coordinate regulatory/government reporting when required; Coordinate lender reporting; Provide for ESIA disclosure; and Disclose GHG emissions, separate to the sustainability reporting. |
| Safety, Health & Environment (SHE) | <ul style="list-style-type: none"> 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. Oversee and audit all contractors in their implementation of the HSESMS and other SHE Plans; Coordinate with Government emergency services as required; Coordinate with Government various government authorities as required; Ensure HSEMS compliance and monitor its implementation. |
| Line 6 Contractors | <ul style="list-style-type: none"> Implement Alba SHE Management Plans; Investigate external grievances as per Alba request and report back to Alba; and Review SEP with IR Department twice a year |
| Supplementary ESIA contractor | <ul style="list-style-type: none"> Plan and conduct stakeholder engagement activities for supplementary ESIA as per the agreed scope of work; Identify additional stakeholders and ways to engage with them; SCE – permitting, Construction & Environment Management Plan; |

| | |
|--|---|
| | <ul style="list-style-type: none"> • Bahrain Authority for Culture and Antiquities – No objection for Construction Laydown Area (CLA); • Any other relevant consultations; and • Set out requirements for additional consultations and stakeholder engagement. |
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1.8 Cross Links to other Alba Plans

This SEP has cross linkages with other Alba Management Plans and Policies namely:

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 and 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 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 stakeholder engagement activities. This system is also used to ensure that the Project is in compliance with Alba's systems.

Traffic Management Plans: Comprehensive Construction Traffic Management Plans have been prepared for the Project, which describe how vehicular and pedestrian traffic will be managed during the construction phase. Alba has also established a traffic working group to specifically coordinate all traffic-related aspects of the Project whilst maintaining a dialogue with external authorities relating to traffic management, i.e. the Ministry of Interior and the Ministry of Works, Roads Directorate.

The Alba SEP 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

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.

2.4 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

2.5 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 table below.

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

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|----------------------------|------------------------|--|
| | | <ul style="list-style-type: none"> 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 process, in any event before the project construction commences, and on an ongoing basis. |
| IFC Performance Standard 1 | Grievance Mechanism | <ul style="list-style-type: none"> Establish a grievance mechanism to receive and facilitate resolution of the affected stakeholders' concerns and grievances about the Project's environmental and social performance. Grievances raised by stakeholders need to be managed through a transparent process, which is culturally appropriate, understandable, readily acceptable to all segments of affected communities, at no cost and without retribution. The mechanism should seek to resolve concerns promptly. The mechanism should be appropriate to the scale of impacts and risks presented by a project and beneficial for both the company and stakeholders. |

| | | |
|----------------------------|------------------------|--|
| | | <ul style="list-style-type: none"> • The mechanism must not impede access to other judicial or administrative remedies. • Affected Communities should be informed about the mechanism in the course of the stakeholder engagement process. |
| IFC Performance Standard 4 | Grievance Mechanism | A grievance mechanism should allow the affected community to express concerns about the Community Health, Safety and Security |
| Equator Principle 6 | Grievance Mechanism | <ul style="list-style-type: none"> • Establish a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's E&S performance. • The grievance mechanism is required to be scaled to the risks and impacts of the Project and have Affected Communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. • Affected Communities should be informed about the mechanism in the course of the stakeholder engagement process. |
| IFC Performance Standard 1 | Information Disclosure | <ul style="list-style-type: none"> • It is regarded as international good practice to ensure that information is provided to stakeholders in a way that would enable them to make contributions meaningfully. • Provide Affected Communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures. • Provide periodic reports to the Affected Communities that describe progress with implementation of the Project on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities. • The frequency of these reports will be proportionate to the concerns of Affected Communities but not less than annually. |
| Equator Principle 10 | Information Disclosure | <ul style="list-style-type: none"> • At a minimum, a summary of the ESIA should be made accessible and available online. |

| | | |
|----------------------------------|-------------------------------------|--|
| | | <ul style="list-style-type: none"> 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, as well as actively seek views concerning risk management and Affected Community or other stakeholder preparedness. |

2.6 Project Standards

The Project will meet the requirements outlined in the section 'Regulatory Framework and Reporting' as given above. In the event that national and international requirements differ, the Project will adhere to the more stringent requirements.

2.7 Alba HSEMS

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

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 981,000 metric tonnes per annum of the highest grade aluminium, with products including standard and T-ingots, extrusion billets, rolling slab, properzi ingots, and molten aluminium. Around 50 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 to include a sixth potline (Line 6) and a new 1,792 MW power station (PS 5). 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 Project will tie in with the existing utilities network within the Alba smelter complex. A new gas line will be installed by the National Oil and Gas Authority (NOGA) external to the Alba fence line for supply of gas. The processed and potable water will be supplied from the existing water supply line. The major raw materials for the Project will be imported via the existing dedicated port facilities.

With a CAPEX of approximately US\$ 3 billion, the Project is one of the largest brownfield developments in the region. Bechtel is the Engineering, Procurement, and Construction Management (EPCM) contractor for the sixth pot line, which will utilise Emirates Global Aluminium's proprietary DX+ Ultra Technology. GE-GAMA Consortium was awarded the Engineering, Procurement and Construction (EPC) contractor for PS 5, while Siemens is the Power Distribution System contractor. J.P. Morgan, Gulf International Bank (GIB) and National Bank of Bahrain (NBB) are the Financial Advisors for this Project.

In June 2015, Alba Board approved the Project and in November 2015, Alba secured the natural gas supply for this Project. Alba successfully closed a US\$ 1.5 Billion syndicated term-loan facility comprising two tranches: Conventional Facility & and Islamic Facility in October 2016 as well as c. US\$ 700 million Export Credit Financing (Euler Hermes and SERV-covered facilities) in July 2017. The Company is looking to secure the second tranche of the Export Credit Agency (ECAs) within the second half of 2017.

The Front End Engineering Design (FEED) study for the Project was completed in the first quarter of 2017. The construction site-works have started in the second quarter of 2017 while the mass earthworks was completed by the end of the third quarter of 2017 as per schedule. Alba has also

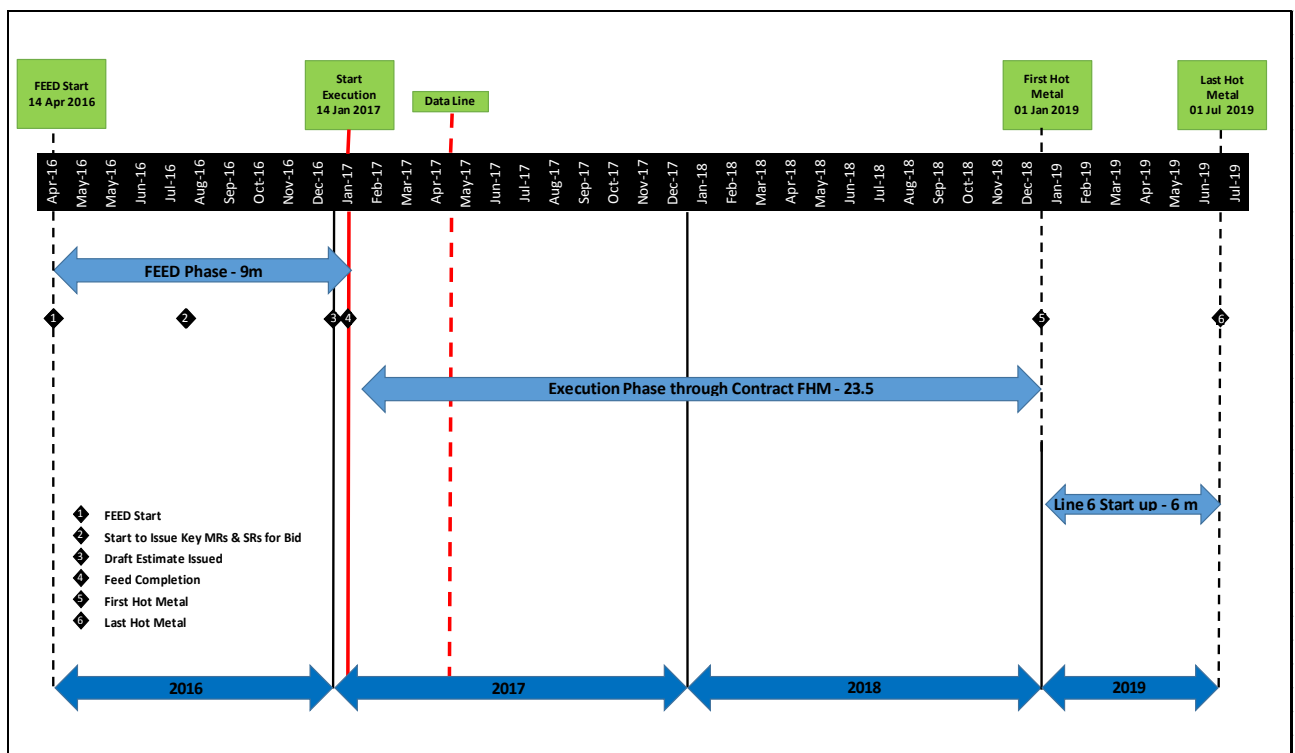
laid the First Concrete in Potline 6 Foundation in May 2017 wherein the concrete foundations will reach 85,000 m3 upon completion by December 2018.

The 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.

3.3 Project Schedule

Construction of the Project commenced in October 2016 and the First Hot Metal (FHM) is expected to be on January 01, 2019. The full ramp-up of Line 6 smelter is expected to take place by June 2019.

The final and approved schedule of the Project is given in the below figure.



4 ESIA FOR THE PROJECT

4.1 ESIA

Due to the Project and its activities, there are likely to be environmental impacts and social changes that may require assessment, management, mitigation and monitoring. As part of the Project development, an ESIA for the project was prepared by Tebodin Middle East Ltd. in June 2014. Following changes to the project design, an Addendum to the ESIA was issued in October 2014. Based on these submissions, the Project obtained an environmental permit from SCE in June 2014.

On behalf of Alba, the ESIA was reviewed by Environment Resource Management (ERM) in 2016 to determine its compliance with IFC Standards, which led to Environmental and Social Action Plan (ESAP) that identified the additional work was required to bring the ESIA into full compliance with IFC Standards.

ERM identified stakeholder engagement as one of the gaps in the ESIA where Alba did not have a formal SEP to identify and engage with all relevant stakeholders. It also identified that there was no formal grievance mechanism in place for use by the local community and other stakeholders.

4.2 Supplementary ESIA

Following completion of the ESIA, the Project design was further developed and improved, which had the potential to alter the E&S impacts of the Project. In addition, Environmental and Social Due Diligence (ESDD) advisors to the Project lenders requested additional environmental and social impact assessment studies to be undertaken. Therefore, a Supplementary ESIA was undertaken by Alba to update the original ESIA with additional information and address many of the ESAP requirements as per the IFC and Lenders requirements.

The Supplementary ESIA was carried out by Environment Arabia Consultancy Services W.L.L (EACS) from May to September 2017 to close the ESAP points including stakeholder engagement and grievance mechanism by:

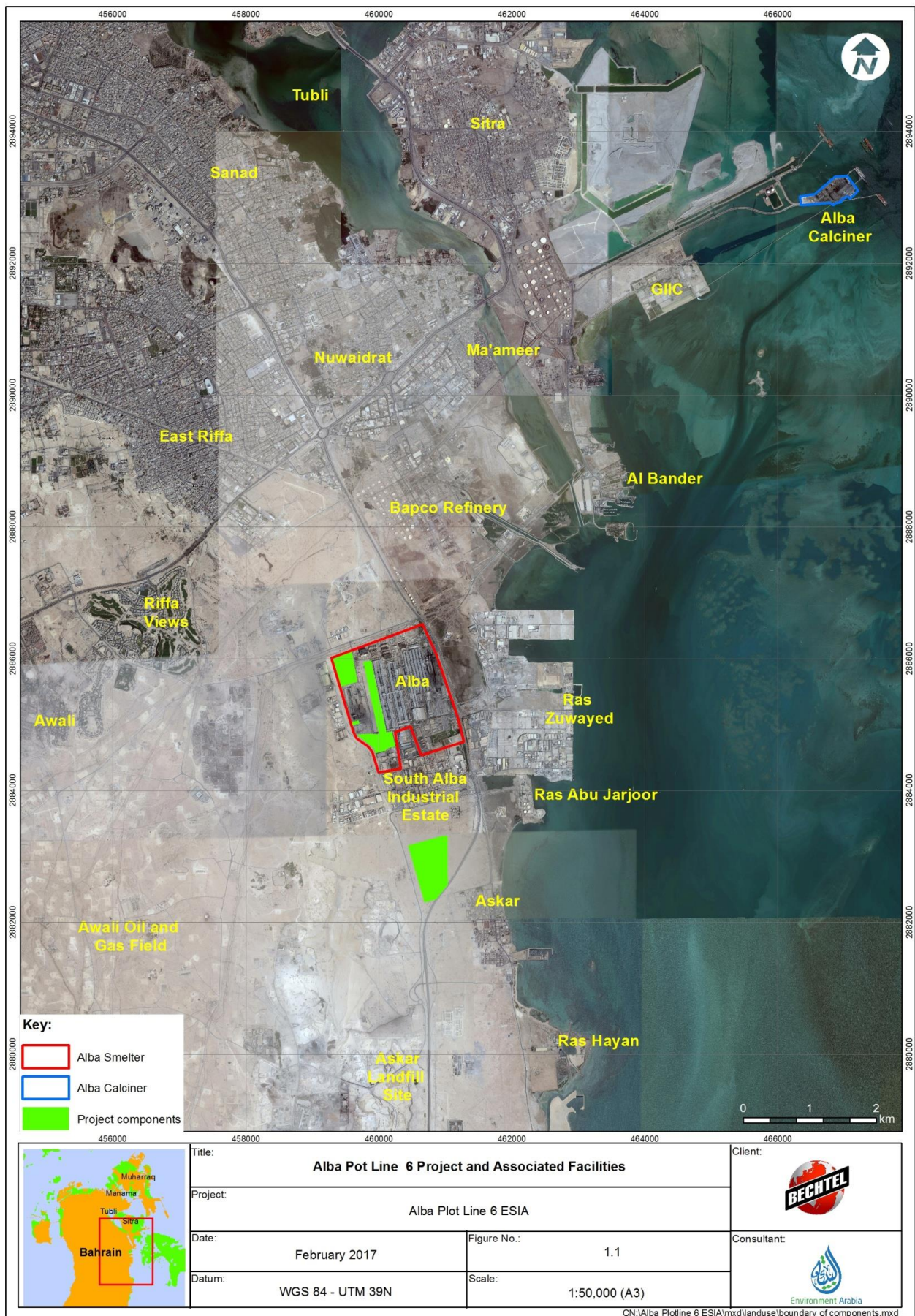
- 1) Identifying additional stakeholder engagement since ESIA; and
- 2) Set out requirements for additional consultations and Stakeholder Engagement Plan.

The original ESIA and the Supplementary ESIA are published on Alba website via www.albasmelter.com to ensure that all stakeholders are fully aware of the E&S impacts that may affect them and Alba's commitments towards mitigating and managing these impacts.

4.3 Project Area of Influence (AOI)

The Supplementary ESIA identified the Project's AOI to include Line 6 site, PS 5, Sitra Wharf and the Construction Laydown Area (CLA) as given in Figure 1.1. The Project's AOI has been described based on a land use survey undertaken within a 5 km radius of Line 6 site, PS 5, Sitra Wharf and the CLA. This radius also includes part of the Awali Oil Field, East Riffa, Nuwaidrat, the Bapco Refinery, Ma'ameer, Ras Zuwaid, Askar, Jaww, and Hafira.

The selection of a 5 km radius is based on the fact that potential impacts of the Project are not expected to reach beyond this distance, particularly with respect to air quality. Also, within this zone, a range of land use types have been mapped and sensitive receptors highlighted. Furthermore, the latest mapping from the Bahrain 2030 National Plan has been consulted to give an indication of planned developments within the 5 km radius.



4.4 Description of Land Use

The Project is 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 is presented in this report as Figure 2.1 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, which is explained the following Chapter in this Document.

Figure 2.1 indicates that the majority of land within a 5 km radius of Alba 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.

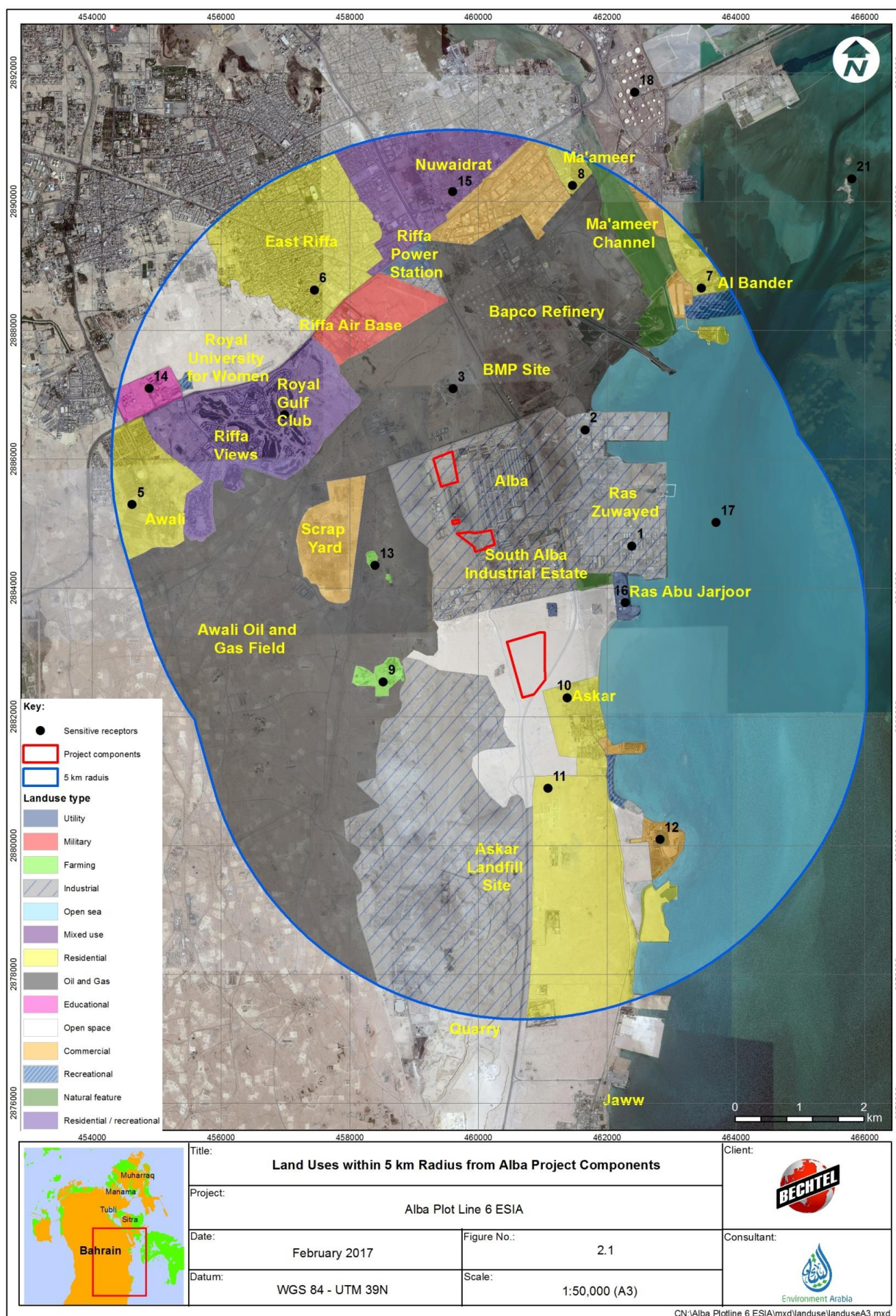
The surveyed radius extends westwards from Alba over the coastal strip into the sea from the Ras Zuwaid Industrial Area (which is mainly occupied by labour accommodation and light industry) down to the villages of Askar and Jaww. Much of the coastal strip is altered by reclamation development for industrial use and public utilities. Ras Abu Jarjoor Desalination Plant, Askar Fishing Jetty, and Bahrain National Mariculture are located in this area and highlighted in Figure 2.1. 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 south west 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.

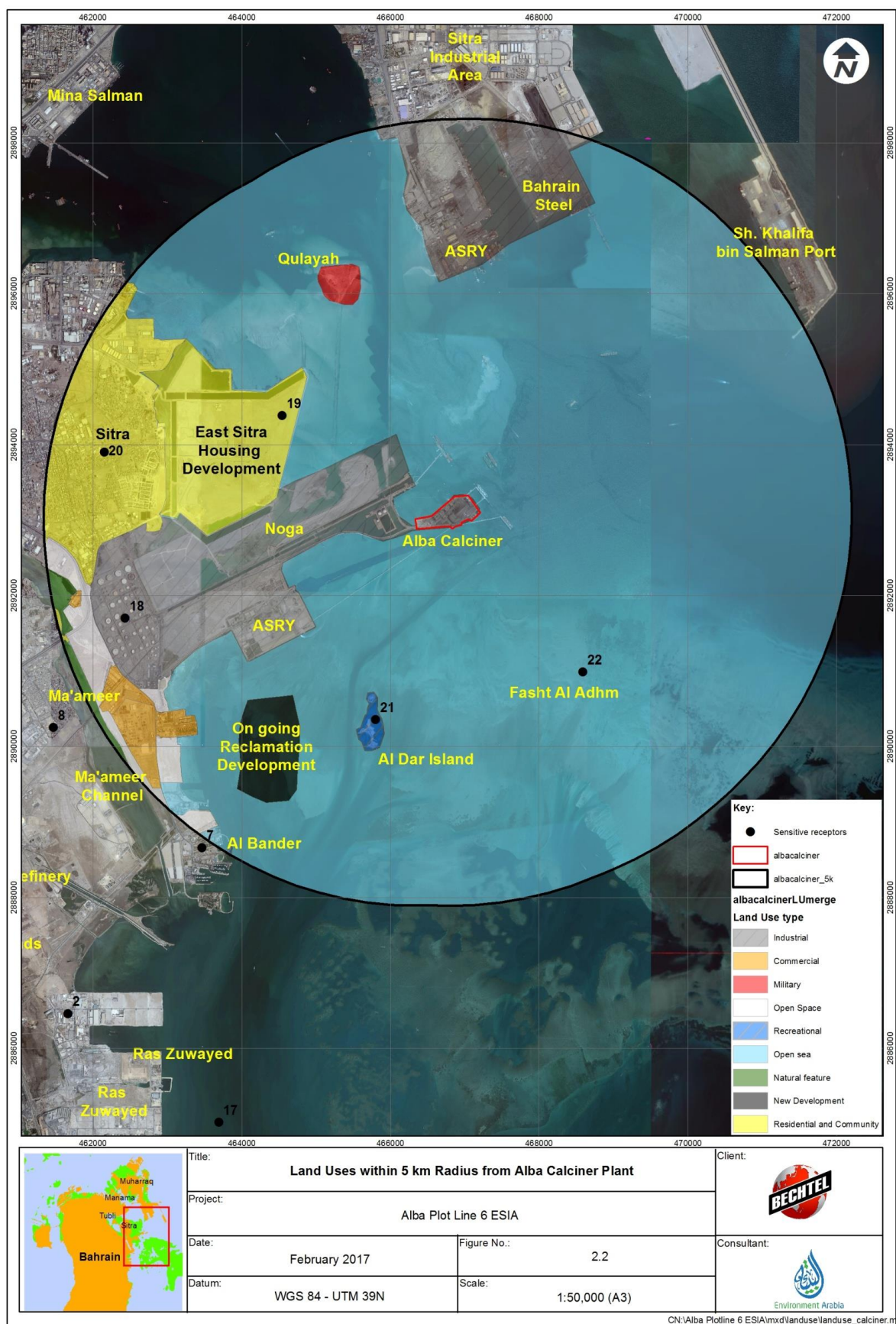
CLA: Askar village is the closest residential area to the CLA, located about 300 m to the southeast. Askar community has a public jetty and a newly developed recreational facility / public park with beach frontage. To the south of Askar village is an on-going residential development known as the Southern 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 provided in Figure 2.2. Sitra Wharf 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. Within Sitra, there are two schools, the location of which are provided on Figure 2.2.

To the south west 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 south west 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.



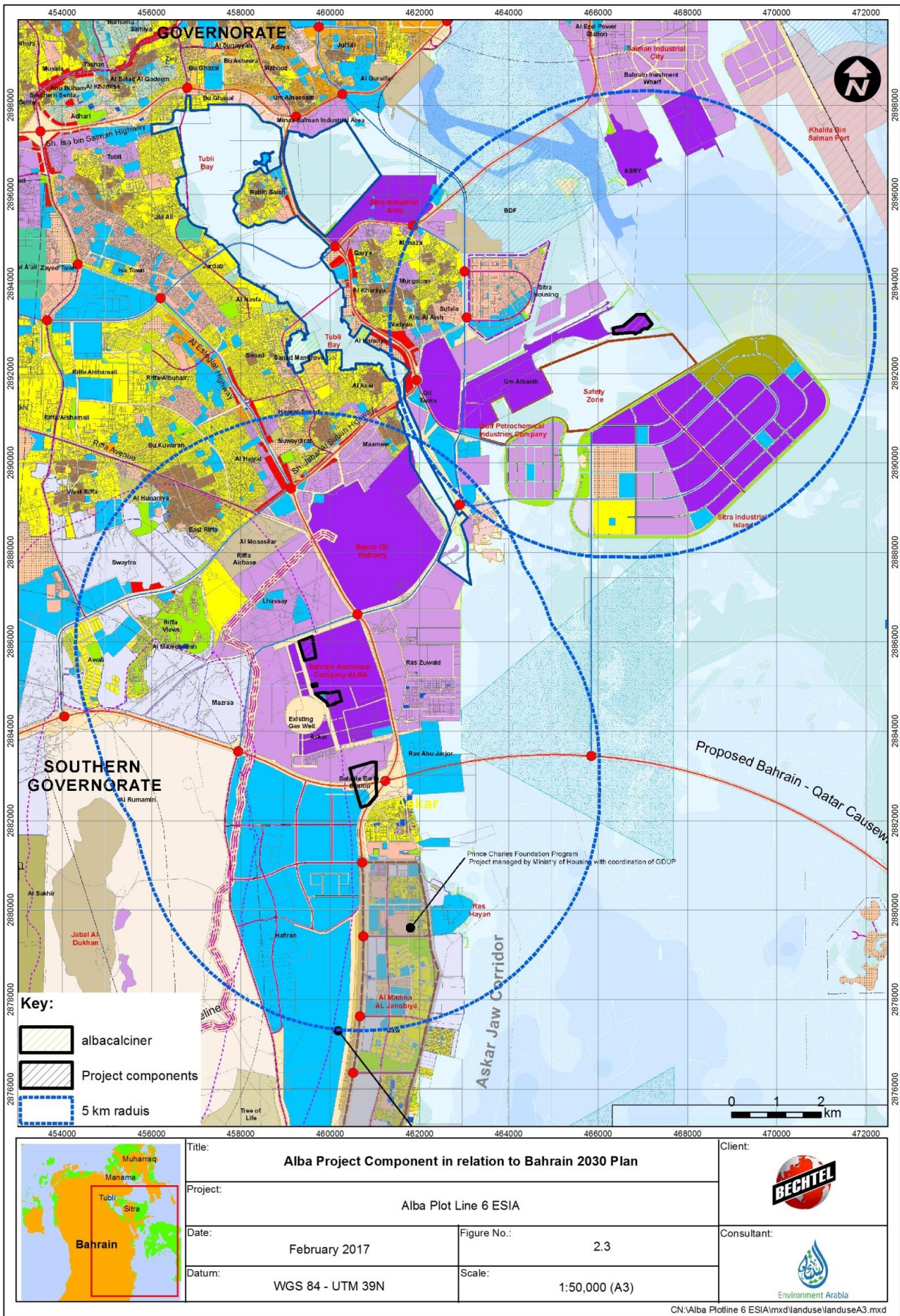
Bahrain 2030 National Land Use Plan: In line with Bahrain 2030 National Planning and Development Strategy (NPDS), the General Directorate for Urban Planning (GDUP) has produced the National Detailed Land Use map (NDLU) as given in Figure 2.3. (NDLU) as given in Figure 2.3. The NDLU map aims to have a coordinated and effective use of available land resources in the country. The 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 2.3 presents the 2030 National Plan land use designations falling within the 5 km zone of the Project. It shows the clear demarcation of the heavy and light industrial areas with possible additional land reclamation for the same purpose.

The vast land areas south of the Project where the currently open space and landfill sites are located are identified for public utility (community services) purposes. The southwest part remains exclusively for pipeline and O&G facilities in the Bahrain (Awali) Field. The A/B pipeline is also shown and highlighted in Figure 2.3.

From Askar village south to Jaww there are areas identified for residential development with public utilities, mixed use and recreational facilities also provided. The villages to the north mentioned in the previous section retain the current extent and land use designation and East Sitra, Nuwaidrat and Ma'ameer are highlighted as "historical core villages" in the NDLU map. In addition to the existing roads, more arterial, connector roads and junction plans are shown in Figure 2.3. The road plan is highlighted by the planned highway that would be connected to the proposed Bahrain-Qatar Causeway and the East Sitra Link Road which will connect the Mina Salman area with Shaikh Jaber Al Ahmed Al Subah Highway.

Apart from the planned residential expansions to the site, no other potential receptors are identified on the NDLU map.



4.5 Alba Port Capacity Upgrade Project

Alba is proposing to increase the capacity of its port facilities at Sitra - Port Capacity Upgrade Project - so that it can import increased quantities of alumina and calcined petroleum coke for its mega Line 6 Expansion Project.

Alba will prepare an ESIA based on the SCE and IFC requirements for the Port Capacity Upgrade Project to assess potential E&S impacts related to the upgrade. The ESIA process will assess the extent of each E&S effect identified on a recognised scale and using recognised methodologies. Where impacts are classified as adverse, the ESIA will identify a combination of mitigation, management and monitoring measures to reduce the predicted environmental impact.

Stakeholder engagement activities will be conducted in the context of such an ESIA, and this SEP will be updated to include details about these stakeholder engagement activities as necessary.

4.6 Identification of Potential Sensitive Receptors - ESIA

The Supplementary ESIA identified eighteen representative potential sensitive receptors within the 5 km study area for Line 6 site, PS 5 and CLA, and four for Sitra Wharf. These include nearest villages, residential areas, housing accommodation for labourers, resorts, recreational facilities, farms and an educational institution.

A description of the potential sensitive receptors and rationale for its selection is provided in the below table.

| Potential Sensitive Receptor | Type | Distance (km) |
|--------------------------------|----------------------------|---------------|
| Line 6, PS 5 and CLA | | |
| Ras Zuwayed 1 | Labour accommodation | 2 |
| Ras Zuwayed 2 | Labour accommodation | 2 |
| Lhassay | Labour accommodation | 1 |
| Riffa Views | Residential / recreational | 2 |
| Awali | Residential | 4 |
| East Riffa Village | Residential | 3 |
| Al Bander / Bahrain Yacht Club | Recreational | 4.5 |
| Ma'ameer Village | Residential | 4.5 |
| Awali Oil Field 1 | Farm | 1.6 |
| Askar Village | Residential | 0.5 |

| | | |
|-----------------------------------|---------------------------------|------|
| Southern New City | Residential | 1.3. |
| Mariculture Centre | Farm (aquaculture) / commercial | 2.6 |
| Awali Oil Field 2 | Farm | 1.5 |
| Royal University for Women | Educational | 4 |
| Nuwaidrat Village | Residential | 4 |
| Ras Abu Jarjur Desalination Plant | Groundwater abstraction | 2.8 |
| Marine Environment | Water quality and ecology | 1.8 |
| Bapco | Groundwater abstraction | 2.5 |
| Sitra Wharf | | |
| East Sitra Development | Residential | 4 |
| Sitra residential and community | Residential | 4 |
| Al Dar Island | Recreational | 3 |
| Fasht Al Adhm | Ecological | 2 |

4.7 Matrix of AOI against ESIA parameters

The Table below provides a matrix showing which of the identified sensitive receptors in the Supplementary ESIA have the potential to be influenced by the Project. The horizontal axis shows the environmental parameters and the vertical axis lists the sensitive receptors.

| Name (sensitive receptors) | ESIA Parameters (environmental parameters) | | | | | |
|--------------------------------|--|-------|-------|---------------------|---------|--------------------------|
| | Air | Noise | Water | Safety in Community | Traffic | Geology and Hydrogeology |
| Ras Zuwayed 1 | √ | √ | | √ | √ | |
| Ras Zuwayed 2 | √ | √ | | √ | √ | |
| Lhassay | √ | √ | | √ | √ | |
| Riffa Views | √ | √ | | √ | √ | |
| Awali | √ | | | √ | √ | |
| East Riffa Village | √ | | | √ | √ | |
| Al Bander / Bahrain Yacht Club | √ | | | √ | √ | |
| Ma'ameer Village | √ | | | √ | √ | |

| | | | | | | |
|-----------------------------------|---|---|---|---|---|---|
| Awali Oil Field Farm 1 | √ | √ | | | | |
| Askar Village | √ | √ | | √ | √ | |
| Southern New Town | √ | | | √ | √ | |
| Mariculture Centre | √ | | √ | | | |
| Awali Oil Field Farm 2 | √ | | | | | |
| Royal University for Women | | √ | | | | |
| Nuwaidrat Village | √ | | | √ | √ | |
| Ras Abu Jarjur Desalination Plant | | | | | | √ |
| Marine Environment | | | √ | | | |
| Bapco Groundwater Usage | | | | | | √ |
| East Sitra Development | √ | √ | | √ | √ | |
| Sitra residential and community | √ | | | √ | √ | |
| Al Dar Island | √ | √ | | √ | | |
| Fasht Al Adhm | | | √ | | | |

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

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

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

Terms

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

Level of knowledge

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

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

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

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

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

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

| Name | Impact on the Project | Impacted by the Project | Level of Knowledge about the Project |
|---|-----------------------|-------------------------|--------------------------------------|
| Supreme Council for Environment | H | H | L |
| Agricultural, Engineering and Water Resources Directorate | H | H | L |
| Bahrain Authority for Culture and Antiquities | H | M | S |
| Sanitary Engineering Affairs | H | M | S |
| Ministry of Transportation and Telecommunications | H | H | S |
| Electricity and Water Authority | H | H | S/L |
| Central Planning Office | H | L | S |
| Urban Planning Directorate | H | L | S |
| Shura Council | H | L | L |
| Council of Representatives | H | L | S/L |
| National Oil & Gas Authority | H | H | S/L |
| Southern Municipal Council | H | H | S/L |
| Southern Municipality | H | H | S/L |
| Southern Area Governorate | H | H | S/L |
| Ministry of Industry and Commerce | H | H | S/L |
| Roads Directorate | H | H | S/L |
| Ministry of Interior | H | H | S/L |
| General Directorate of Traffic | H | H | S/L |

| Name | Impact on the Project | Impacted by the Project | Level of Knowledge about the Project |
|---|-----------------------|-------------------------|--------------------------------------|
| Bapco | H | H | S/L |
| Tatweer | L | L | S |
| Supreme Council for Women | M | M | S |
| Bahrain Defence Force (Al Moaskar Camp) | H | H | S/L |
| Customs - Directorate of Sea Ports | H | H | 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 Project's E&S aspects.

| Name | Impact on the Project | Impacted by the Project | Level of Knowledge about the Project |
|--|-----------------------|-------------------------|--------------------------------------|
| Environment Friends Society | L | L | S |
| Bahrain Environment Society | H | M | S/L |
| Arab Youth Climate Movement – Bahrain Chapter | M | M | S/L |
| Bahrain Women's Association | M | M | S |
| Migrant Workers Protection Society | H | H | S/L |
| Bahrain Youth Society for Human Rights (BYSHR) | H | H | S/L |
| Bahrain Center for Human Rights (BCHR) | H | H | S/L |

South Alba Industrial Estate (SAIE): SAIE is one of the seven industrial areas in Bahrain comprising a cluster of industrial and commercial companies including local entrepreneurs and businesses in the immediate Project area and businesses who may gain benefits by providing goods and services to Alba for the Project.

| Name | Impact on the Project | Impacted by the Project | Level of Knowledge about the Project |
|--|-----------------------|-------------------------|--------------------------------------|
| Havelock AHI W.L.L | H | L | N |
| South Alba STP | H | L | N |
| Midal Cables | H | H | S/L |
| Aluwheel WLL | H | H | S/L |
| Shaw Nass Middle East | H | L | M |
| Al Kowary Industries | H | L | N |
| Zohal Construction | H | L | N |
| Olayan Kimberley Clark | H | L | N |
| Yateem Oxygen | H | L | N |
| CBI Mass Pipe Fabrication | H | L | N |
| Esmaely Lenzohm Electrical Co W.L.L | H | L | N |
| Hasan Mansouri | H | L | N |
| Ramsis Engineering | H | L | N |
| Alaa Industrial Equipment Factory AFI | H | L | N |
| Bahrain Alloys Manufacturing Company | H | H | N |
| BAMCO | H | H | N |
| Bahrain Scrapmould | H | H | N |
| Crown Industries | H | H | N |
| Modern Bureau for Cleaning and Maintenance | H | M | N |
| Delmon Interior and Furniture Factory | H | M | N |
| Corrosion & Technical Services W.L.L | H | M | N |
| Bahrain Rubber Co. W.L.L | H | M | N |
| Ramsis Main Office | H | M | N |
| MEBA | H | M | N |
| BFCC | H | M | N |
| Bahrain Maintenance and Diving Services | H | H | N |
| Shomeli | H | L | N |
| Al Khalidia Group | H | L | N |
| Aluminium Services | H | L | N |
| Well Flow | H | L | N |
| Mashal Group | H | L | N |
| Leo Metal Cladding | H | L | N |
| Madem Gulf | H | L | N |

| Name | Impact on the Project | Impacted by the Project | Level of Knowledge about the Project |
|--|-----------------------|-------------------------|--------------------------------------|
| Golden Neon | H | L | N |
| Rahal Tents | H | L | N |
| Fareed Aluminium Services | H | M | N |
| Quality Industrial Services | H | M | N |
| Jashanmal & Sons | H | H | N |
| BSPCA Animal Welfare Centre | H | M | N |
| Bahrain Egypt Rolling Mill | H | M | N |
| Bahrain Welding Wire Products | H | M | N |
| West Point Home (Bahrain) W.L.L Finishing & stitching Unit | H | M | N |
| Awal Fibreglass | H | M | N |
| Bahrain Switchgear & Lighting Industries | H | M | N |
| Orta Textile company W.L.L | H | M | N |
| Ashbee | H | H | N |
| Ameeri Industries | H | H | N |
| Middle East Fibreglass Factory | H | H | N |
| Polycon Bahrain W.L.L | H | H | N |
| Tylos Plastic Industries Company | H | H | N |
| Empack | H | M | N |
| Al Salam Furniture Industries | H | M | N |
| Concrete & Asphalt Technology spc | H | M | N |
| Middle East Recycling Company WLL | H | M | N |
| West Point Home Spinning Unit | H | M | N |
| Metals of Bahrain | M | M | N |
| Kooheji & Bros Group | H | M | N |
| Tariq Furniture | H | M | N |
| Yas Holding Company | H | M | N |
| Grand Tiger | H | M | N |
| UCo Steel Company W.L.L | H | M | N |
| Everplas | H | M | N |
| Bahrain Galvanising Factory | H | M | N |
| Banapco | H | M | N |
| Bahrain National Plastic Company W.L.L | H | M | N |
| Pyrotek Bahrain spc | H | M | N |
| Donir Marble W.L.L | H | M | N |

| Name | Impact on the Project | Impacted by the Project | Level of Knowledge about the Project |
|--|-----------------------|-------------------------|--------------------------------------|
| Al Haram Fibre Glass Factory | H | M | N |
| Ceramica Delmon Company | H | M | N |
| Clark Industries | H | M | N |
| Gulf Tissue | H | M | N |
| New Island Contracting | H | M | N |
| Al Ghanah Construction | H | M | N |
| Ahmed Omer | H | M | N |
| Decorators W.L.L | H | M | N |
| Raymond International W.L.L | H | M | N |
| Slingtek | H | M | N |
| Sarmat W.L.L | H | M | N |
| R.P Construction | H | M | N |
| 3DI | H | M | N |
| KB Petrochemicals Co W.L.L | H | M | N |
| Ahmed Omer Manufacturing | H | M | N |
| Awal Fibreglass | H | M | N |
| National Profile Factory | H | L | N |
| Gulf Power Beat | H | L | N |
| Charilaos Apostolides (Bahrain) W.L.L | H | L | N |
| Abdulkarim Al Jahromi Construction Company | H | L | N |
| Turk Mechanical Industries W.L.L | H | M | N |
| Integrated Facility Management | H | L | N |
| Saar Group of Companies | H | M | N |
| Al Rawaby | H | M | N |
| Crown | H | M | N |
| Haji Ali Haji | H | M | N |
| Almoayyed Carpentry and Aluminium | H | M | N |

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 | M | S/L |
| Alayam | H | M | S/L |
| Albilad | H | M | S/L |

| Name | Impact on the Project | Impacted by the Project | Level of Knowledge about the Project |
|---------------------|-----------------------|-------------------------|--------------------------------------|
| Alwatan | H | M | S/L |
| Gulf Daily News | H | M | S/L |
| Daily Tribune | H | M | S/L |
| Gulf Industry | H | M | S/L |
| Bahrain News Agency | H | M | S/L |
| Trade Arabia | H | M | S/L |
| Bloomberg | H | M | S |
| Reuters | H | M | S |

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

| Stakeholder Category | Impact on the Project | Impacted by the Project | Level of Knowledge about the Project |
|----------------------|-----------------------|-------------------------|--------------------------------------|
| Local Communities | H | H | 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 | M | N |

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

As per the Project's AOI, the nearest residential areas are the villages of Askar, Jaww, Awali, Riffa, and Sitra. These villages are well developed, similar to the rest of Bahrain, with good infrastructure, and a developed commercial and residential real estate and a commercial sector. These villages cannot be categorised as 'vulnerable' as many areas in these villages have been earmarked for further development with public utilities, mixed use and recreational facilities as per the NDLU.

The Supplementary ESIA finds that the contribution of construction vehicle exhaust emissions at the laydown area, approximately 300 m from Askar Village, will be negligible. Based on the distance between the plant/machinery to the nearest residential properties at Askar Village, the vibration effects of the operational plant will also be negligible.

There may be vulnerable households within each of the villages mentioned above such as those consisting of the elderly and female headed households, however these are not more (or less) vulnerable than such households located in the rest of the country.

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

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.

In particular, Alba coordinates with the SCE to conduct all environmental permitting consultation part of this process for approvals. The SCE is directly responsible for the environmental permitting and regulation of the Project. The below table provides a summary of written communications with SCE since submission of the 2014 ESIA Report and includes letters from SCE permitting development to commence, with or without conditions.

Communications with SCE

The below table highlights the consultations that were undertaken by Alba regarding the Project.

| No | Topic | Date |
|----|---|------|
| 1 | Alba received approval for the Environment Impact Assessment (EIA) for Line 6. | 2003 |
| 2 | Environmental Scoping Report was prepared and submitted to the SCE for review and approval. This Report described the proposed Project, available environmental baseline data, proposed environmental baseline surveys, anticipated environmental impacts and methodology for executing the ESIA for the Project. | 2010 |

| No | Topic | Date |
|----|--|------------|
| 3 | Screening Application was submitted to the SCE regarding the potential addition of Potline 6 to the Alba smelter. SCE's response was received indicating the topics to be considered in the ESIA. | 18/08/2011 |
| 4 | SCE approved the Environmental Scoping Report prepared by TME. | 05/03/2012 |
| 5 | The Ministry of Urban Planning was consulted in 2013 regarding the availability of the land adjacent to Alba located to the west of the Alba smelter for use as material laydown area and Contractors' offices during the construction phase of the Project. | 2013 |
| 6 | The Ministry of Tourism and Culture was consulted in 2013 regarding the importance of archaeological and national heritage with respect to the location of the proposed laydown area west of Alba's facilities. Response received that there was no archaeological concern in the Project area. | 30/03/2014 |
| 7 | The ESIA was submitted to SCE. | 9 /06/2014 |
| 8 | An Environmental Permit or Approval was issued by the SCE with conditions. | 9/06/2015 |
| 9 | A stakeholders meeting comprising government authorities was held to present the first result of the submitted ESIA. | 28/08/2015 |
| 10 | Alba received a letter from the SCE stating that there was no objection to start excavation activities for Line 6. However, any further construction operations must be postponed until Construction and Operational Environmental Management Plans are submitted and approved by the SCE | 09/08/2016 |
| 11 | Letter from SCE to Alba regarding Dewatering activities procedures stating that adherence to Ministerial Order 3 of 2005 is required regarding environmental conditions in the workplace. | 21/08/2016 |
| | Letter submitted to SCE regarding the gas distribution network for the line 6 project | 21/08/2016 |
| 12 | Alba submitted Operational Environmental and Social Management Plan (OESMP and Construction Environmental and Social Management Plan (CESMP) to the SCE | 26/09/2016 |
| | Received permission letter from SCE regarding the gas distribution network for line 6 expansion | 15/11/2016 |
| 13 | Letter from SCE to Alba with reference to the Environmental Permit issued by SCE on 07/06/2015 with conditions. The CESMP was reviewed and found to be satisfactory and provided a number of parameters to be adhered to during construction phase. It also stated that the OESMP was under review with the SCE. | 21/11/2016 |
| 14 | Letter sent to SCE regarding the CEMP for power station 5 | 09/02/2017 |
| 15 | Received permission from SCE regarding the CEMP for PS5 | 13/03/2017 |
| 16 | Letter sent to SCE to request meeting to discuss requirement for the ambient air quality monitoring program | 11/07/2017 |

| No | Topic | Date |
|----|---|------------|
| 17 | Received letter form SCE regarding the requested meeting for ambient air quality monitoring program | 17/11/2017 |
| 18 | Meeting held with SCE regarding the ambient air quality monitoring program | 23/11/2017 |
| 19 | Letter sent to SCE regarding permission to import and use radioactive devices for PS5 | 27/10/2017 |
| 20 | Received approval for import and use of radioactive devices for PS5 | 02/11/2017 |
| 21 | Received notification for the completion of the SCE on the review of the supplementary ESIA report | 27/11/2017 |
| 22 | Received approval of the Supplementary ESIA from the SCE | 05/12/2017 |

Further, Audit reports regarding the implementation of the CESMPs are provided to the SCE on a monthly basis by EACS. This reporting will continue for the whole of the construction phase and the implementation of OESMPs will be audited and reported to the SCE for the first year of operation.

Communication with Government Ministries

Effective engagement with government ministries is an essential part of the Project success so that engineering designs can be co-ordinated e.g. connections to utility services. In terms of management of E&S impacts, now that the planning and design of the development is mostly complete there are few further decision-making requirements left that require co-ordination at ministry level. However, there will be a need for continued engagement and consultation with Bahrain's Ministry of Interior (Mol) in respect of management of traffic in South Alba Industrial Estate (SAIE) and planning and management of the transportation of oversized loads.

Communication with National and Local Government

Alba is located with the Southern Governorate, which includes a Municipal Council comprising locally elected representatives. There are also elected representatives from the Southern Governorate area within the national government Council of Representatives and appointed representatives within the national government Shura Council.

The Southern Governorate was written to by Alba on 27 July 2017 to invite them to a stakeholder meeting with Alba and Ministry of Works to advise them of the traffic management plans that Alba has put in place for the construction of Line 6 Expansion Project. A presentation on traffic management was given to Southern Governorate representatives and Ministry of Works on 6th July 2017 by Alba.

Communication with South Alba Industrial Estate and Surrounding Areas

Businesses within SAIE comprise one of the most important stakeholder groups as they are nearest neighbours to the development site. During the construction phase, access to the site will be through the SAIE, and hence traffic will be of particular concern. Some businesses to the east of the Alba smelter across King Hamad Highway in Raz Zuwayed Industrial Area (RZIA) are included in this group as there will be a need to transfer abnormal loads from Muharraq Engineering Jetty and there are also some sub-contractor's yards in this area.

This group has been identified as a key stakeholder group and consultations and engagement have been prioritised for them. All businesses in SAIE and in the surrounding area have been contacted by representatives of Alba and a contacts database has been set up. The database contains the contact details for approximately 95 contacts for SAIE; and approximately 17 contacts for RZIA. All of these businesses have been provided with a copy of a letter dated 14 May 2017 providing a summary of the construction programme and advising businesses that there will be increased levels of traffic in the area. The letter also invites the recipients to make any comments or complaints via the Alba Integrity Hotline and confirms that an exhibition on the Line 6 Expansion project will be held and the recipients of the letters will be invited.

Bechtel has also consulted individual businesses within SAIE with regard to clearance of items of equipment and scrap from road verges to improve road safety.

Communication with Civil Society Representatives

There are a number of active civil society groups that have an interest in environmental and social welfare issues. These include the Bahrain Environment Society and The Migrant Workers Protection Society (MWPS).

A consultation meeting has already taken place between the MWPS and Bechtel the Line 6 Engineering Procurement and Construction Management (EPCM) contractor on 28th May 2017 regarding management of workers welfare.

Publication of the ESIA

The 2014 ESIA Report and the 2017 Supplementary ESIA Report has been published on the ALBA website and is available at the following location:
<http://www.albasmelter.com/Corporate%20Responsibility/CSR/Pages/default.aspx>

6.4 Public Disclosure of Information to Date

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

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

| No | Press Release | Dates |
|----|--|------------|
| 1 | Alba Power Expansion Project celebrates 3 million work-hours without LTI | 02 01 2018 |
| 2 | Alba Line 6 Smelter achieves new record in Safety 5 Million Work-Hours without LTI | 26 12 2017 |
| 3 | Alba and Bechtel sign MoU to explore further opportunities | 11 12 2017 |
| 4 | Alba signs MoU with GE for fourth GT block in PS5 | 05 12 2017 |
| 5 | Alba is the first aluminium smelter in the world to use the GE 9HA GT | 28 11 2017 |
| 6 | Alba announces new Manager for Power Expansion Project | 20 11 2017 |
| 7 | Alba's Line 6 First Hot Metal by 01 January 2019 | 03 10 2017 |
| 8 | Alba progresses its Historic US\$ 3 Billion Line 6 Expansion Project | 11 09 2017 |
| 9 | Alba Line 6 pot shell fabrication in full swing | 18 09 2017 |
| 10 | Alba Line 6 Expansion Project eclipses 2 million man-hours without LTI | 22 08 2017 |
| 11 | Alba launches Safety Awareness Campaign for Line 6 Contractors | 10 07 2017 |
| 12 | Alba reaches Financial Close of c. US\$ 700 million Export Credit Financing - | 09 07 2017 |
| 13 | Alba CEO Visits Major Supplier of Line 6 Expansion Project | 05 07 2017 |
| 14 | Line 6 First Concrete Pot Room Foundations | 02 07 2017 |
| 15 | Line 6 construction site works underway | 18 05 2017 |
| 16 | Alba concludes Line 6 FEED Study | 29 05 2017 |
| 17 | Alba secures c. US\$ 700 million in Export Credit Financing for Line 6 Expansion Project | 16 04 2017 |
| 18 | Alba Successfully Closes \$1.5 Billion Syndicated Loan | 16 10 2016 |
| 19 | Alba's Line 6 Syndicated Loan Draws Huge Demand | 08 09 2016 |
| 20 | Alba Awards Line 6 Power Distribution System to Siemens | 29 08 2016 |
| 21 | Alba Awards GE & GAMA Consortium as Power Station 5 Contractor | 01 08 2016 |
| 22 | Alba holds Line 6 Supplier and Contractor Forum | 23 05 2016 |
| 23 | Alba Line 6 CAPEX down to around US\$ 3 Billion | 29 05 2016 |
| 24 | Alba appoints Bechtel as EPCM for Line 6 | 17 04 2016 |
| 25 | Alba upgrades to EGA DX+ Ultra Technology for Line 6 | 23 02 2016 |
| 26 | Alba receives environmental permission for Line 6 | 06 09 2015 |

| | | |
|----|---|------------|
| 27 | Alba appoints financial advisors for Line 6 Expansion Project | 15 06 2015 |
| 28 | Alba approves Line 6 Expansion Project which will make it the world's largest single site smelter | 10 06 2015 |
| 29 | Alba Chairman and CEO visit Emirates Global Aluminium | 04 12 2014 |
| 30 | Alba thanks Bahrain Cabinet for Line 6 support | 02 07 2014 |
| 31 | Alba appoints Line 6 Director | 05 03 2013 |
| 32 | Alba awards Bechtel Canada a LOI to perform a Bankable Feasibility Study for the Line 6 expansion project | 12 12 2012 |
| 33 | Alba selects Dubal DX+ technology for Line 6 bankable feasibility study | 10 12 2012 |
| 34 | Alba launches Line 6 bankable feasibility study | 05 12 2012 |

6.5 Alba Sustainability Report

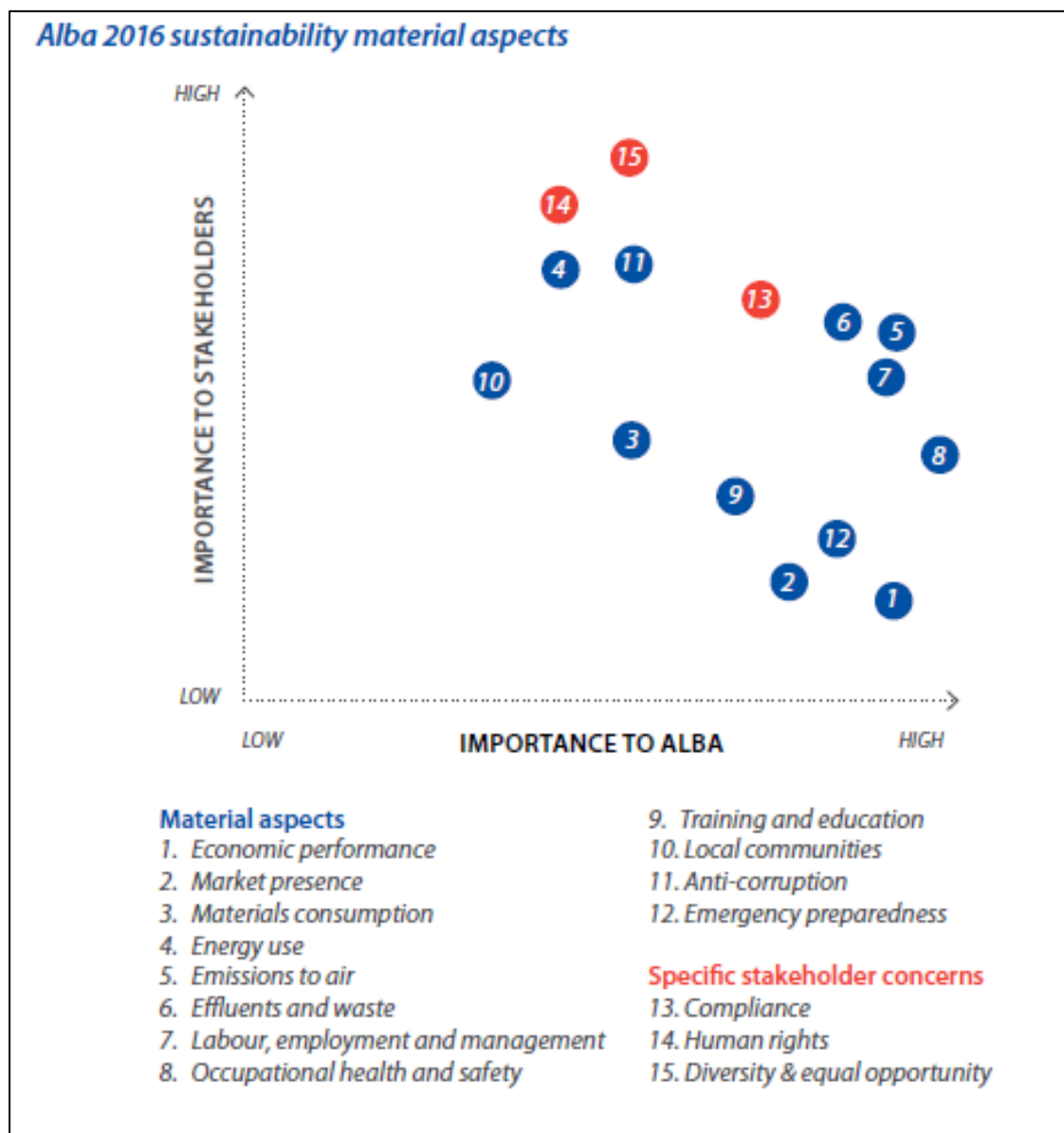
Alba will be reporting and disclosing the E&S impacts of its daily operations as well as sustainability initiatives in a transparent manner through its annual Sustainability Report.

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. This 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 communicated Alba's environmental, health and safety, governance and social performance to Alba's stakeholders.

This 2016 Sustainability Report was 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.

A Materiality Assessment in accordance with the GRI G4 Guidelines was carried out in order to identify and prioritise sustainability related aspects that are relevant to Alba's short-term economic performance, stakeholder expectations, regulatory obligations, values, policies and strategies as well as those factors critical for enabling success for the organisation.

A summary of the results is presented in the figure below.



6.6 Stakeholder Engagement Techniques

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

| Engagement Techniques | Most Appropriate Application of Technique |
|-----------------------------|--|
| Information Posters/Banners | Banners alongside Alba route and next to Alba) |

| Engagement Techniques | Most Appropriate Application of Technique |
|--|---|
| Correspondence by phone/email/Text/Instant messaging | Invite stakeholders to meetings |
| Print media and radio announcements | Distribute Project information to government officials, organisations, agencies and companies |
| | Disseminate Project information to large audiences, and illiterate stakeholders |
| | Inform stakeholders about consultation meetings |
| Formal meetings | Present project information to a group of stakeholders |
| | Allow the group of stakeholders to provide their views and opinions |
| | Build impersonal relations with high level stakeholders |
| | Distribute technical documents |
| | Facilitate information dissemination using PowerPoint presentations, posters, models, videos and pamphlets or project information documents |
| | Record discussions, comments/questions raised and responses |
| Workshops | Present Project information to a group of stakeholders |
| | Allow the group of stakeholders to provide their views and opinions |
| | Use participatory exercises to facilitate group discussions, brainstorm issues, analyse information, and develop recommendations and strategies |
| | Recording of responses |

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 Surveys –Materiality Assessment Tool (online weighted tool that asks respondents to determine the materiality of the topic based on its significance to Alba, importance to people, and Alba's performance in topic.) | Annual |
| | | Alba Employees | Correspondence by e-mail and/phone | As required |
| Lender Reporting | To report on the planning and construction phases of the Project To update on Alba and its contractors' and sub-contractors' compliance or other E&S Requirements | Lenders & ECAs | Periodic Audits & Reports | Every 6 months during the construction phase and once a year during the operation phase |
| | | | Periodic Site visits | As required |

| | | | | |
|---------------------|---|--|--|------------------------|
| | | | | |
| Financial Reporting | To give information about Alba's activities and financial performance | General Public, Shareholders, and Stakeholders | Annual Report | Annual |
| | | Media | Press Releases, Media Interviews Newspaper articles, website | As required |
| Supplementary ESIA | To engage with potential affected stakeholders of the Project on assessment of potential Project impacts, proposed mitigation measures, and continuous monitoring efforts | General public and all stakeholders | Exhibitions Meeting | Once-Off Event |
| | | Relevant government agencies | Formal Meetings, Periodic Audits, Permits and Approvals | Regularly, as Required |
| | | NGOs | Reports | As Required |
| | | Media | Press Releases, Media Interviews, Site Visit, Newspaper articles, Alba website | As Required |
| | | Contractors | Progress Reports, Contracts, Formal Meetings | Regularly, as required |

| Supplementary ESIA Disclosure | To disclose any Supplementary ESIA | 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 | Press Releases, Exhibitions Meeting, Social Media, Alba website | Once-off awareness campaign, then as required |
| | | Alba Contractors | Formal Meetings, Audits, Workshop | Regularly, as required |
| | | Nearby communities and receptors | Press Releases, Exhibitions Meeting, Social Media, Fliers | 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 | Nearby communities and receptors | Exhibitions Meeting, Information Boards, Formal Meetings | Regularly and as required |
| | | Relevant government agency – General Directorate of Traffic and Ministry of Interior | Contracts and Formal Meeting | Regularly, as required |
| | | Contractors | Progress Reports, | Regularly, as required |

6.8 Stakeholder Exhibitions Meeting

Following the approval of the Supplementary ESIA by the SCE in December 2017, Alba will conduct a Stakeholders Exhibition Meeting (SEM) to disseminate information regarding the E&S impacts of the Project 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 has established a Stakeholder Management Group with the Project's EPCM Contractor Bechtel and EACS, the Project's independent environmental consultant, 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 graphics form as far as possible and will be presented in English and Arabic.

Traffic Management with SAIE will be given a special focus as it has the potential to impact neighbouring businesses and will require on-going interaction with SAIE occupants throughout the construction phase to be effectively managed.

Full copies of all ESIA documentation will be available at the Exhibition to refer to. Provisionally, other topics to be addressed will be:

1. History of Alba and importance of the Line 6 Expansion Project including the economic and developmental benefits of the Project;
2. Outline of the aluminium smelting process;
3. Key environmental impacts of Line 6 and PS5 operation – air quality impacts, waste, etc.
4. Construction impacts – traffic; and construction workforce management.

Alba representatives, Project personnel and its environmental consultant will be present during the SEM to guide stakeholders and to answer questions. All visitors will be given an opportunity to provide written and verbal feedback, anonymously if required.

The SEM will be held as separate sessions for different groups as below:

- 1) Government and civil society and Press and media;
- 2) SAIE and neighbours; and
- 3) General public.

6.10 Communications Plan for the SEM

A Communications Plan for the SEP is in progress and includes media advertising, invitation letters, radio announcements, etc. For the purposes of meeting the Lenders requirements outlined in the Environment & Social Action Plan (ESAP), there will be two versions of the Alba Stakeholder Engagement Plan (SEP); one prior to the Stakeholders Exhibitions Meeting (SEM) and one post this event.

Stakeholder Monitoring and Reporting

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

The below indicators will be used to assess the SEP.

- Implementation of the SEP Table;
- Understanding of the Project among stakeholders; and
- Management of issues by Alba.

Alba will maintain details and activities of public information disclosure and consultation collected throughout the Project, which will be available to the public through a high-level Annual Stakeholder Engagement Report. This Report will include but is not limited to:

- Number of stakeholder engagement activities held in the year;
- Date, time and place of engagement with various groups;
- Feedback from the stakeholder engagement meetings on the Project;
- Number of stakeholders during each engagement;
- Any new stakeholders identified and their details;
- Information materials disseminated;
- Comments received during stakeholders engagement by government authorities and other parties on the Project;
- Issues raised during various stakeholder engagement processes;
- How these issues have been addressed, including timeliness of responses and remedial, compensation and mitigation; and
- Half-yearly stakeholder engagement plans.

6.11 Final SEP

Alba will issue for immediate purposes two versions of the SEP.

Draft Version 001 of the Alba SEP: This Version 001 will highlight the stakeholder engagement process in accordance with the SCE approved Supplementary ESIA and the IFC and Lenders requirements. The Draft Version 001 of the Alba SEP was completed by December-end 2017.

Draft Version 002 of the Alba SEP: The Version 002 will be prepared post the Alba SEM in March 2018* and will comprise details of the actual event, list of the issues raised during the SEM and the mitigation measures as given by the Project teams -- Alba SHE Department, Line 6 Contractors such as Bechtel, GE Gama and Siemens and any other concerning Alba Departments. Draft Version 002 of the Alba SEP will be ready by May 2018 prior to the fourth E&S Audit by Citrus Advisors in July 2018.

Alba will also prepare an SEP for the Alba Port Capacity Upgrade Project, following the approval of the ESIA for this Project by the SCE. This will be a separate SEP and will also be published on the Company's website.

The type and focus of follow-up engagement with the stakeholders will depend on the outcome of the Exhibition and other consultations. The feedback from these will be analysed to identify if there are any concerns that have been raised that have not adequately addressed by the Supplementary ESIA. If such is the case, additional mitigation and management measures will be considered by Alba through the appropriate channels to address these concerns. The feedback will also be used to identify what aspects of the stakeholder engagement programme should continue and what form it will take.

**The date (final) will be updated in the SEP Version 002*

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.albassembler.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 (**Annex 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.

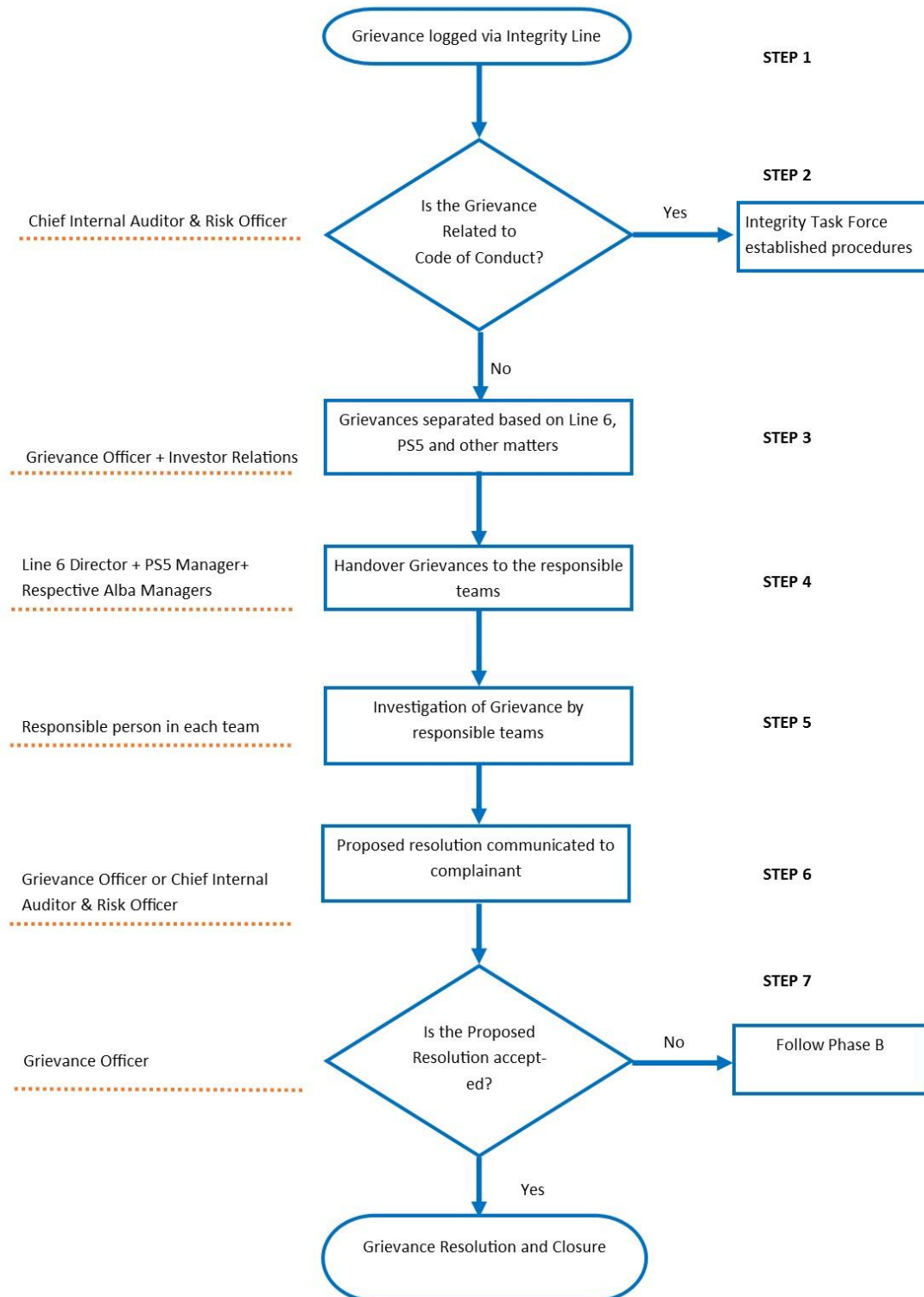
Alba's assigned GO will be the point of contact at all times during the grievance and resolution process.

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.

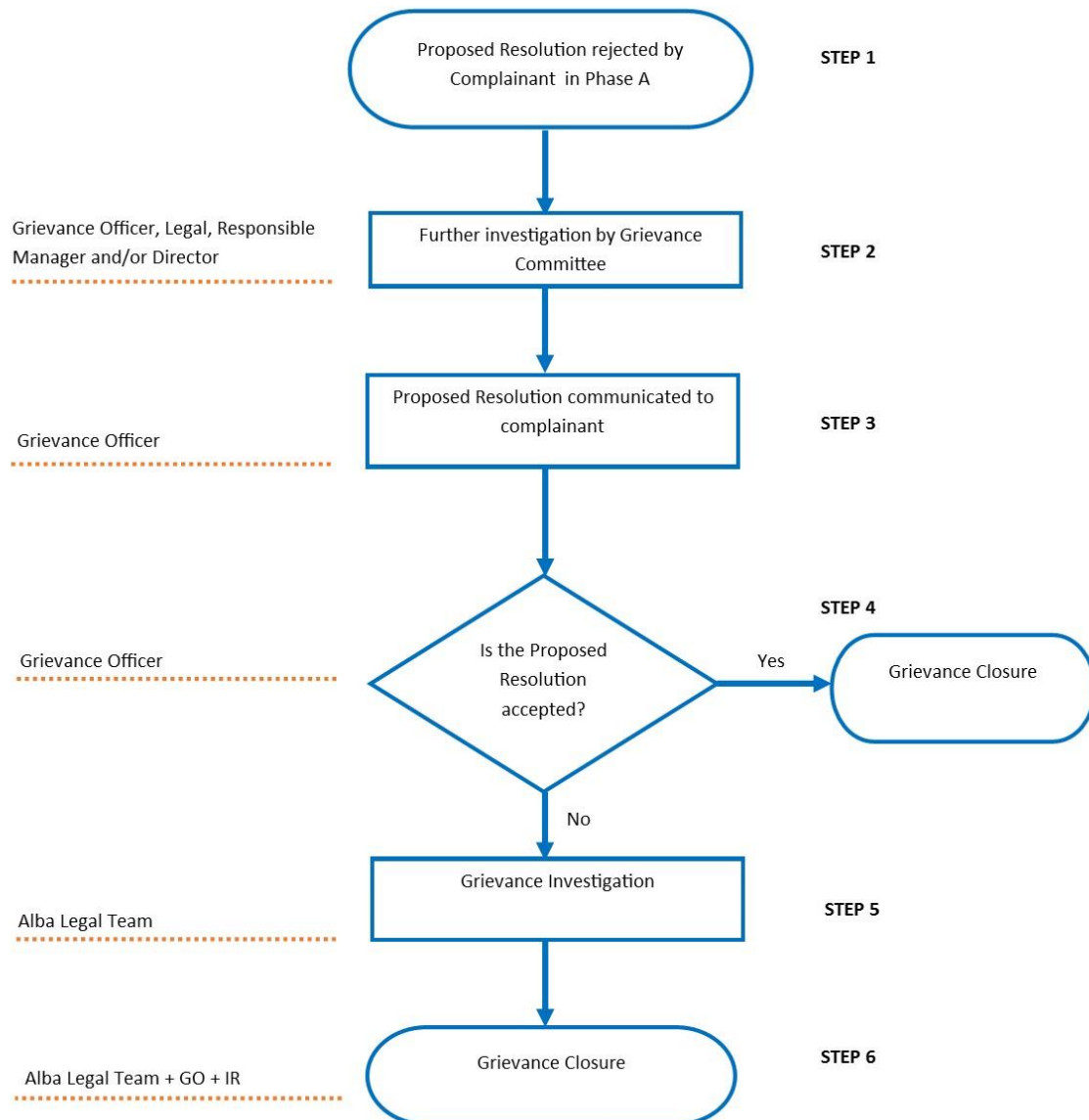
7.8 Process Flow of External GM

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: <ul style="list-style-type: none"> 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

| | |
|--|-------|
| Bankable Feasibility Study | BFS |
| Construction Laydown Area | CLA |
| Capital Expenditure | CAPEX |
| Environment and Social Impact Assessment | ESIA |
| Emergency Response Plan | ERP |
| Environment and Social | E&S |
| Environment Resource Management | ERM |
| Environmental and Social Action Plan | ESAP |
| 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 |
| Tebodin Middle East | TME |

Annex

Annex 1 - Alba External Grievance Mechanism Logging Form