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Procedure	<b>EGA.SC.RS.OP.01</b>	Implementation Date	<b>20-Mar-2023</b>
Section	<b>Responsible Sourcing</b>		
Title	<b>EGA Responsible Sourcing Policy</b>		

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## 1. INTRODUCTION

This policy covers Emirates Global Aluminium PJSC ("EGA") *and the entities controlled by it or in which it holds a majority interest, including Guinea Alumina Corporation.*

EGA is committed to being a responsible business, including in our sourcing of materials, goods and services. We conduct business in compliance with all applicable laws and requirements prescribed by industry initiatives of which we are a member. Our responsible sourcing commitment has led us to establish and implement a due diligence process as defined in the *OECD Guidance for Responsible Business Conduct* (OECD RBC Guidance) and the United Nations Guiding Principles on Business and Human Rights (UNGPs). Where minerals and metals supply chains are concerned, our process follows the recommendations in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (OECD Guidance).

This policy sets out our commitment to responsible sourcing at EGA. Our Responsible Sourcing Standard provides the specific responsible sourcing expectations we have of our suppliers.

## 2. COMMITMENT

### 2.1 All suppliers

EGA is committed to identifying, assessing and responding to risks of adverse impacts and actual adverse impacts in our supply chain that are linked to our operations, products, or services by our suppliers, even if we have not contributed to those impacts.

We expect our suppliers to comply with the requirements in our Responsible Sourcing Standard and to implement due diligence policies and processes.

If a supplier fails to comply with our Responsible Sourcing Standard and is unable or unwilling to address gaps between the supplier's performance and our expectations, we may suspend or discontinue the relationship.

We undertake responsible sourcing due diligence on all our suppliers, with additional specific requirements and risk assessment processes in place for suppliers of minerals and metals.

### 2.2 Suppliers of minerals and metals

EGA is committed to the responsible sourcing of minerals and metals and to adopting a progressive, risk-based supply chain due diligence approach, in accordance with the recommendations set out in the OECD Guidance.<sup>1</sup>

We recognize that the extraction, handling, processing, transportation and trade of minerals and metals from conflict affected and high-risk areas (CAHRAs)<sup>2</sup> has the potential to contribute

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<sup>1</sup> OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance").

<sup>2</sup> As per the OECD Guidance, "Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil

to, benefit from, or result in adverse social and environmental impacts.

We do not tolerate the minerals in our supply chain being associated with the following:

- Serious abuses (such as torture, cruel, inhuman and degrading treatment; forced or compulsory labour; child labour; human rights violations and abuses such as widespread sexual violence; war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide)
- Direct or indirect support to non-state armed groups
- Direct or indirect support to public or private security forces
- Bribery and fraudulent misrepresentation of the origin of minerals
- Money laundering
- Non-payment of taxes, fees and royalties to governments.

### **3. IMPLEMENTATION**

#### **3.1 Due diligence management systems**

EGA undertakes risk based due diligence focusing on those activities in the supply chain where risks to people and the environment are greatest. We assess our own activities and the activities of our suppliers against the standards set out in our Responsible Sourcing Standard.

EGA has management processes in place to identify and assess risks in the supply chain. The outcomes of these processes may lead to risk mitigation plans or further actions, as appropriate. Findings of supply chain due diligence are reported to senior management.

Due diligence activities are overseen by the Responsible Sourcing department with support from relevant departments (Supply Chain Excellence and Legal and Compliance). The Head of Responsible Sourcing reports directly to EGA's EVP Supply Chain. This Responsible Sourcing Policy, our Responsible Sourcing Standard and our approach to due diligence has been approved by senior management at EGA.

We will maintain the information generated by the due diligence management system for a minimum of five years and will make it available to commercial partners upon request.

#### **3.2 Employee training**

EGA provides training to relevant employees to ensure that the Responsible Sourcing Standard is communicated, understood and applied within the company.

#### **3.3 Supplier engagement**

We will communicate EGA's Responsible Sourcing Standard to all suppliers. We will seek to build and/or exercise leverage over the actors in the supply chain who can most effectively and most directly prevent and mitigate the risks of adverse impacts.

As appropriate, EGA will assist immediate suppliers in building capacity on the practical application of EGA's Responsible Sourcing Standard. Where risks of adverse impacts and/or actual adverse impacts are identified, we will engage suppliers, as feasible, on the design and implementation of measurable improvement plans, involving external stakeholders such as government or civil society as appropriate.

EGA encourages its suppliers to engage with their own suppliers to disseminate and adopt similar responsible sourcing standards across the supply chain.

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infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law."

### **3.4 Review and report**

EGA will regularly review due diligence practices and guidance to ensure that they remain responsive to our assessments of evolving supply chain risks.

We will publicly report on supply chain due diligence in EGA's annual sustainability report.

For compliance and business conduct related concerns, EGA has deployed Your Voice, which is a confidential reporting line which is accessible 24/7 in multiple languages by phone and online: [www.ega.ethicspoint.com](http://www.ega.ethicspoint.com)