



Sustainability Report 2024

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About this Report

We are delighted to present our Sustainability Report for the year 2024, reflecting our dedication to transparency, local empowerment and sustainable practices. EMSTEEL is committed to reaching net zero greenhouse gas emissions by 2050 and advancing the UAE’s global strategic sustainability agenda.

Our sustainability strategy is based on leveraging strategic partnerships to accelerate decarbonisation and environmental stewardship, committing to our people and communities and becoming the trusted and responsible partner of choice for our customers and ecosystem partners.

Purpose

Embracing our commitment to sustainability, our 2024 report sheds a spotlight on “Leadership”. This theme showcases our ambition to lead the transformation towards more sustainable building practices and greener future. Our report offers an in-depth overview of the approach followed, to embed sustainability into our daily business activities and operations.

It also highlights our efforts and initiatives in leading the industrial sector towards a sustainable future alongside our economic,

environmental, social and governance (ESG) performance relevant to the material topics of significance to both EMSTEEL and our stakeholders.

Scope and Boundary

This report outlines EMSTEEL’s 2024 sustainability performance, encompassing all our operations under direct control in the UAE. It highlights our ongoing journey towards sustainability and innovation, driven by our shared vision of operational evolution and global growth.

Boundary	Frequency	Reporting Period
EMSTEEL	Annual	1 st January 2024 to 31 st December 2024

Reporting Alignment

We continuously improve our sustainability reporting by aligning with global frameworks. This report is published according to the Global Reporting Initiative (GRI) Standards, Certification Authority for Reinforcing Steels

(CARES) and highlights our contributions to the United Nations Sustainable Development Goals (UNSDGs).

We also align with Sustainalytics standards and adhere to national guidelines from Abu Dhabi Securities Exchange (ADX), among others.



Third-party Assurance

The third-party verifier conducted a comprehensive validation of EMSTEEL’s 2024 Sustainability Report KPIs, ensuring accuracy and completeness in alignment with industry standards such as GRI, ADX, and CARES.

This process included interviews and documentation reviews to confirm compliance. Additionally, the verifier performed a carbon footprint verification for both the steel and cement businesses, assessing Scopes 1, 2, and

3 emissions and evaluating the methodologies used for data collection.

The carbon capture verification ensured that carbon capture processes and technologies complied with ISO 14064-2, focusing on the amount of carbon captured and maintaining data integrity. Lastly, the verifier reviewed the carbon intensity calculations in accordance with the CBAM criteria to ensure accurate reporting and regulatory compliance.

Accountability and Transparency

Regular Public Reporting

We will provide annual updates on our progress toward decarbonisation and ESG targets, including detailed emissions data and project milestones.

Independent Validation

EMSTEEL’s emissions data and decarbonisation progress will be subject to third-party audits and independent verification to ensure transparency and credibility.

Let Us Hear from You

We believe that sustainability is an ongoing journey. We welcome your feedback and questions regarding the content of this report and our efforts in sustainability.



Executive Statement

“As we continue to drive industrial growth at EMSTEEL, I am proud to present our 2024 Sustainability Report and reflect on our role as the UAE's largest steel and building materials manufacturer. We are committed to spearheading the sustainable and smart transformation of the industrial sector. By establishing strategic partnerships, pioneering the utilisation of green hydrogen for steel production, and actively contributing to sustainability-linked advocacy, we are advancing the global green steel agenda and inspiring the next generation to lead with sustainable innovation.”



Engineer Saeed Ghumran Al Remeithi
Group Chief Executive Officer, EMSTEEL

This year marks a significant milestone in our journey as we unveiled our new brand identity: **EMSTEEL**. This rebranding aligns with our broader ambition to solidify our position on the global stage and enhance our competitive edge in the steel and building materials industries. It represents our commitment to creating products, services, and solutions to build a better world, in addition to driving global sustainability efforts in our sector through promoting a low-carbon supply chain in collaboration with our partners.

As a recognised Steel Sustainability Champion by the World Steel Association and Co-Chair of AFID IRENA, EMSTEEL consistently aligns its efforts with the UAE's Net Zero by 2050 Strategic Initiative and global decarbonisation efforts.

We are fully committed to achieving our net zero goal by 2050, through the implementation of our updated decarbonisation strategy, and are aiming to reach a 40% reduction of GHG emissions in the Steel Business and 30% in the Cement Business by 2030, from 2019 baseline, in line with the Third Nationally Determined

Contribution (NDC 3.0), issued by the United Arab Emirates Ministry of Climate Change and Environment (MOCCA). Additionally, in 2024, we have introduced a comprehensive ESG Strategy in response to climate risks and stakeholder expectations, recognising the impact of material ESG topics on our business performance.

We are actively contributing to the UAE becoming one of the world's largest hydrogen producers by 2031 through our green hydrogen pilot project for green steel production—the first of its kind in the MENA region—leading the decarbonisation of the UAE's steel sector.

With a shared commitment to climate ambitions, we have collaborated closely with our partners to achieve these objectives. By utilising alternative fuels and raw materials and increasing the localisation of our supply chain, we are aiming to foster a circular economy, reduce CO₂ emissions, and enhance local value creation. These efforts underscore our dedication to sustainable practices and our proactive approach to environmental stewardship.

In line with our ESG Strategy objectives, we continued to improve across a number of performance metrics, including further reducing our scope 1 and 2 GHG emissions in 2024 for both our Steel and Cement Business Units, a testament to our relentless pursuit of sustainability and operational excellence.

Notably, 86% of our electricity in Emirates Steel comes from clean and renewable sources, contributing to the lowest GHG intensity recorded since 2019. Our focus to improve our ESG impact has also been recognised from prominent rating agencies, evident in our 2024 CDP Rating for Climate Change, which moved to "B", from "B-" in 2023, placing us above the global industry average, CARES Responsible Sourcing, which improved to "Very Good" compared to 2023, as well as receiving our first rating from Sustainalytics.

Our efforts have not gone unnoticed. The World Economic Forum has acknowledged EMSTEEL as one of the top five steel producers worldwide for our pioneering efforts in decarbonising steel production. At Make It in the Emirates Awards 2024, the Group's contributions to the UAE's industrial sector were recognised with the Best Sustainable Manufacturing Award and the ICV Excellence Award, and we have also

been recognised as the 2024 Steel Sustainability Champion by the World Steel Association for our pioneering efforts in decarbonising steel production. Finally, Emirates Steel and Anabeeb have been awarded the prestigious "Green Eco Label Award" from the Environment Agency Abu Dhabi. These recognitions highlight our leadership in industry and our commitment to environmental sustainability.

Our dedication to our people and social responsibility was evident through our robust workforce development and community engagement programmes. This year, we saw a remarkable 74% increase in new hires and a 45% rise in training hours, with a notable 4.5 times increase in training hours for females. Our employees also contributed 1,448 volunteer hours, and we increased our community initiative expenditure by 17%.

These efforts underscore our dedication to workforce development, gender equality, and community engagement.

At the heart of our business priorities are the health and safety and well-being of our people. Our leading industry safety performance has improved at Group level in 2024, thanks to the successful implementation of the second phase of our Safety Excellence Transformation Programme (Aman 2.0).

At EMSTEEL, we are committed to the highest standards of governance. This year, we established the Ethics & Compliance Function to oversee activities related to whistleblowing, code of conduct, anti-bribery and corruption, conflict of interest, and fraud control. These measures ensure that we continue operating with integrity and transparency.

Despite significant market challenges in 2024, including global steel market overcapacity, we have maintained our presence and demonstrated remarkable resilience and adaptability.

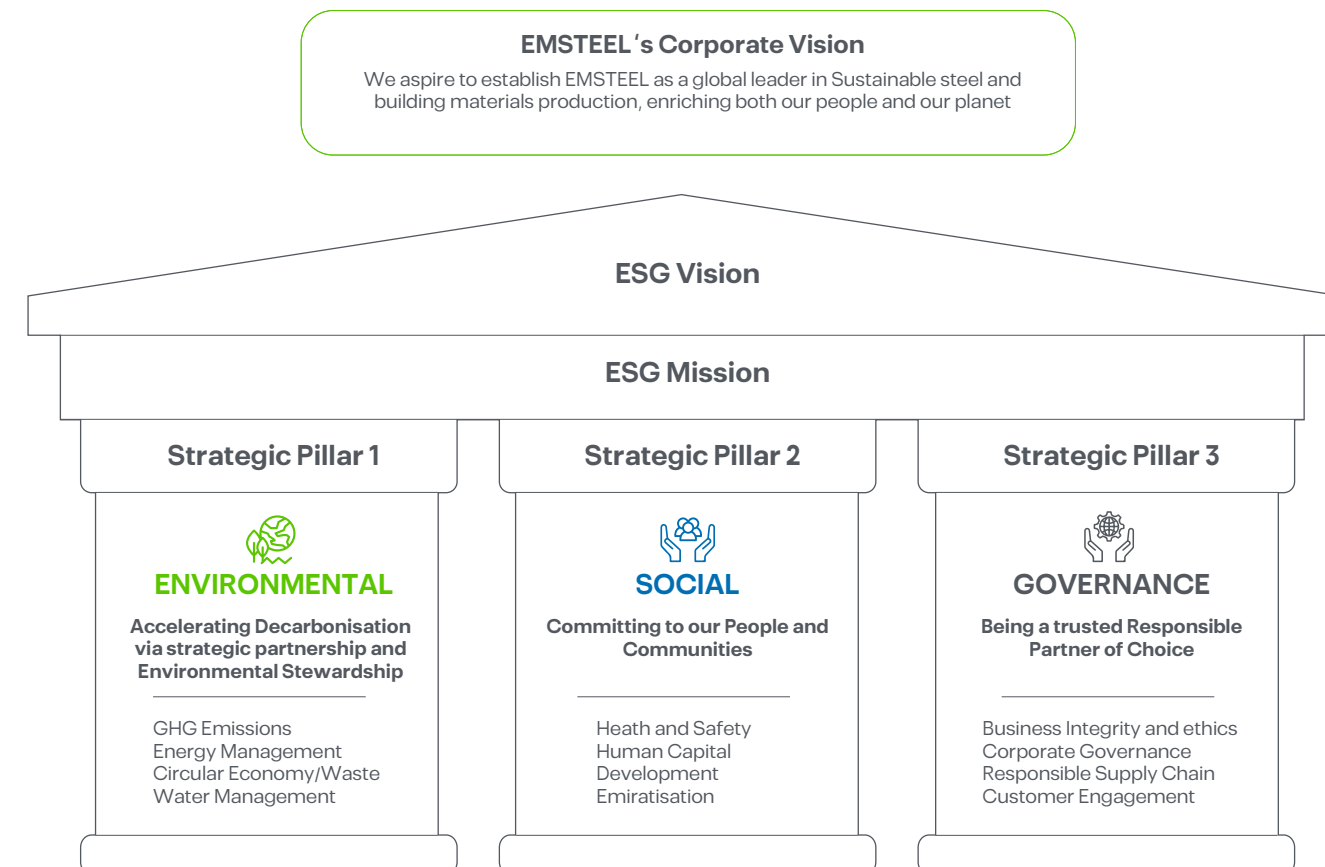
As we look to the future, EMSTEEL remains steadfast in our commitment to sustainability, innovation, and excellence. We will continue to lead by example, driving positive changes within our industry and beyond. Together, with our stakeholders, we will build a resilient, sustainable, and prosperous future for generations to come.

01

EMSTEEL at a Glance



1.1. Our ESG Strategy Framework



1.2. 2024 Sustainability Performance Highlights

In 2024, EMSTEEL has launched its ESG and Decarbonisation strategies, aspiring to be established as a leading provider of sustainable steel and building materials.

Decarbonisation & Environmental Stewardship

- ▶ **Zero** environmental or non-compliance issues
- ▶ **14%** of electricity consumed in Al Ain Cement from clean energy and renewable sources
- ▶ **8%** reduction in waste directed to landfill
- ▶ **0.67** (tCO₂e/t) GHG intensity in Emirates Steel (lowest since 2019)
- ▶ **2%** energy intensity reduction in Emirates Steel
- ▶ **B** Climate Change CDP rating (improving from B-)
- ▶ **86%** of electricity consumed in Emirates Steel from clean energy and renewable sources
- ▶ **1%** energy intensity reduction in Al Ain Cement Factory

Commitment to Our People & Communities

- ▶ **0.36** TRIFR (reduced by 36% at Group level from 2023)
- ▶ **3%** increase in employee and contractor HSE training in 2024
- ▶ **17%** increase in community initiative expenditures over 2023
- ▶ **14%** women in management
- ▶ **35%** more employees trained on environment, sustainability and decarbonisation than in 2023
- ▶ **67** Nationalities (6% increase over 2023)
- ▶ **13%** increase of average training hours per employee in 2024
- ▶ **51.7%** in focus Emiratisation rate
- ▶ **1,365** local suppliers engaged

A Trusted & Responsible Partner

- ▶ **Zero** incidents of non-compliance with ethical, moral, or regulatory matters
- ▶ **29%** female representation in our Board of Directors
- ▶ **48.2%** of our total procurement spending on local suppliers (10% increase from 2023)
- ▶ **86%** of new suppliers for Emirates Steel and 34% for Emirates Cement are ICV certified
- ▶ **+30** AI-driven solutions successfully implemented in 2024
- ▶ **100%** of new suppliers screened using environmental and social criteria

Key:

- ▶ Decreasing trend
- ▶ Increasing trend
- ▶ Same as last year

Highlights



Launched our ESG and Decarbonisation Strategies



Establishment of ESG & Sustainability and Ethics & Compliance Functions, and R&D Department



1st of-a-kind in MENA region green hydrogen to green steel pilot facility



Increased our clean and renewable electricity through I-REC certificates



1st steel maker worldwide to capture part of our CO₂ emissions

PIONEERING SUSTAINABILITY

MEMBERSHIPS



Member of World Green Economy



Participated in the CO₂ Emissions Data Collection Programme and recognised as member



Member of Responsible Steel

CERTIFICATIONS



Renewed our Nuclear Quality System Certification (QSC-677) by ASME



First company to receive ECAS certifications for product QA in construction from MolAT through UK CARES



Received the Green Industries Label Certificates for our Emirates Steel and Anabeeb

RECOGNITIONS & AWARDS



Co-chair of the Alliance for Industry Decarbonisation (AFID) led by IRENA



Recognised for Leadership in Sustainable Innovation and Green Hydrogen Project, for two consecutive years



Recognised as one of the top five steel producers worldwide by WEF



Recognised as 2024 Steel Sustainability Champion by WSA



Sustainable Manufacturing Award and ICV Excellence Award



UAE Industry 4.0 Digital Leader Award from (MolAT)



Recognised by NMDC Energy for our exceptional partnership and commitment to ICV



Procurement Sustainability Champion



Announced as a finalist in the worldsteel steelChallenge-19 World Championship



Recognised in the "GC Powerlist Middle East 2024" hosted by Legal500

1.3. Company Profile

Who We Are

EMSTEEL is a public joint stock company (ADX: EMSTEEL). As the UAE's largest steel and building materials manufacturer, we incorporate the latest innovative technologies in manufacturing, efficiency and sustainability, to deliver the high-quality products, services and solutions that you need for your business to thrive today and tomorrow. We manufacture high quality steel and building materials used in the UAE and in major global markets, including the construction, engineering, and energy sectors. Additionally, we produce premium cement, blocks, pipes and dry mortar, creating a one-stop shop for the manufacturing and construction sectors.

At EMSTEEL, we are committed to refining our manufacturing processes and creating steel and building materials sustainably and safely, whilst supporting the growth of the heavy industrial sector in the United Arab Emirates.

We are a key member of several national and international organisations, sharing the sector's best practice and promoting the concept of sustainable business such as Emirates Green Building Council, AUCBM General Secretariat, Arab Iron Steel Union, Green Business Network (GBN), Arab Union of Cement and Building Materials, and the UAE's Steel Producers Committee (SPC).



What We Do

We strive to maintain our position as a world-class steel and construction materials manufacturer that provides customers with premium products and solutions. We are committed to the highest standards of safety and to fostering a culture of innovation in the UAE's industrial sector. Through our leading market position, we strive to play a major role in contributing to the diversification of the UAE's economy in line with national priorities such as the UAE Industrial Strategy 'Operation 300', Abu Dhabi Economic Vision 2030, UAE Net Zero by 2050, UAE National Hydrogen Strategy 2050, UAE Energy Strategy 2050, UAE Green Agenda 2030, UAE Circular Economy Policy 2031 and We The UAE 2031 Towards New Peaks.

Our Vision

To be a global leader in sustainable steel and building materials production, enriching both our people and our planet.

Our Mission

To contribute to UAE's economic growth, become the leading supplier of best quality steel and building materials, cultivating human capital in our businesses and championing safety, sustainability and net zero future.

Our Values

People
Accountability
Innovation

Our Journey

EMSTEEL's creation is closely linked to Abu Dhabi Government's long-term economic vision from over 20 years ago. In 1998, SENAAT supported the government's efforts to diversify the economy by establishing an industrial steel sector, leading to the formation of Emirates Iron and Steel Factory (EISF) and eventually EMSTEEL. 87.5% of EMSTEEL is owned by ADQ, an Abu Dhabi investment and holding company, an active sovereign investor with a focus on critical infrastructure and global supply

chains. 12.5% of the shares of EMSTEEL are held by free-float shareholders and traded on ADX.

EMSTEEL began by rerolling imported steel billets and producing rebars used in the construction sector. In 2001 the commissioning of RM1, a rolling mill with a capacity of 500,000 metric tons per annum, was a major milestone, transforming the steel industry in Abu Dhabi and the UAE. Additionally, the Emirates Cement Factory, established in 1976 in Al Ain, became the UAE's largest cement manufacturer.

Our Expansion

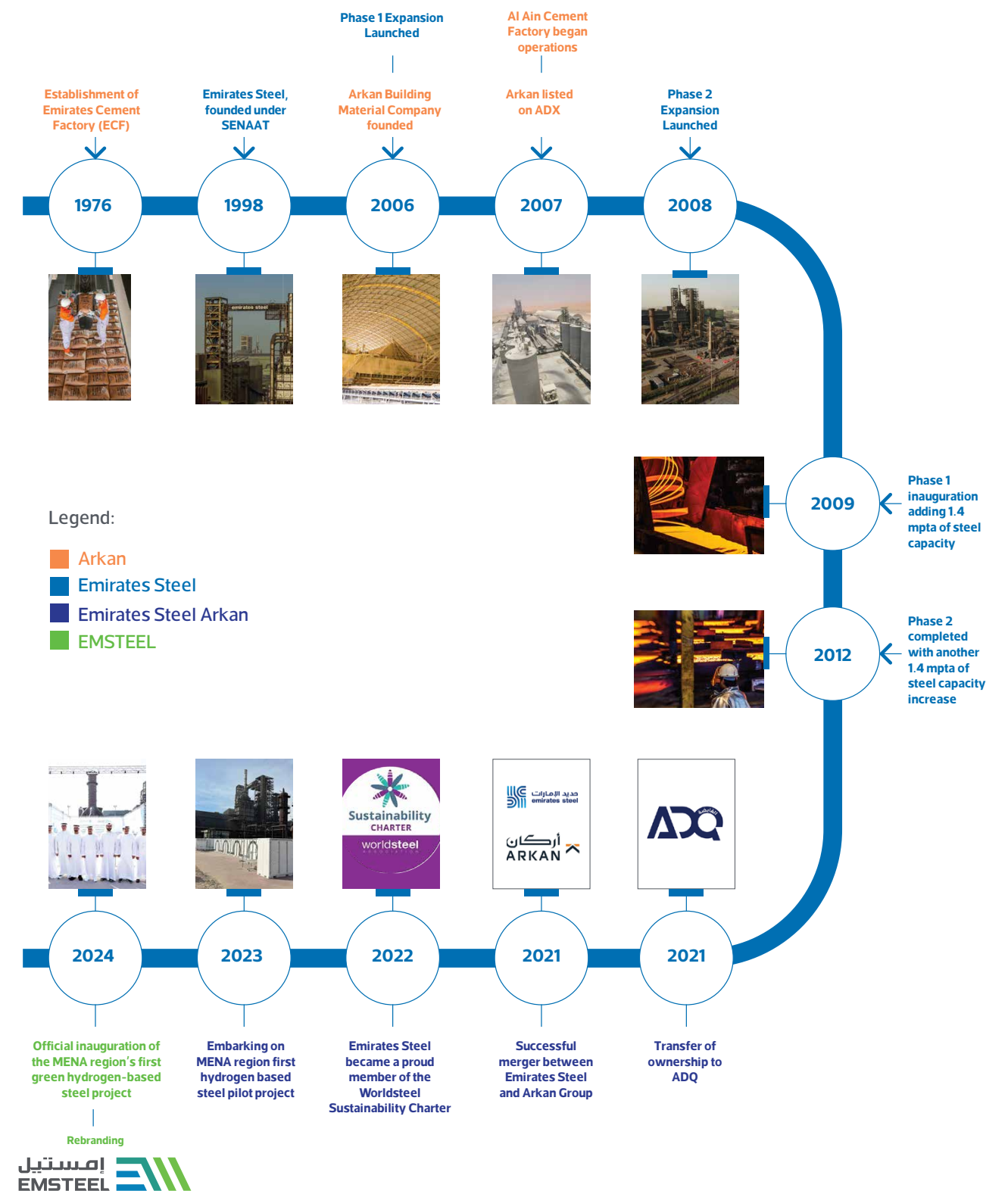
EMSTEEL quickly evolved from an imported steel rerolling business to the only fully integrated steel manufacturing facility in the UAE. Our robust business model and strategic expansion have enabled us to stand out in the global steel industry, with a diverse product portfolio including rebars, wire rods, sections, sheet piles and semi-finished products.

EMSTEEL's Contribution to UAE's Iconic Projects

Our steel and building materials have been used in some of the UAE's most iconic construction projects, including the Burj Khalifa, Emirates Palace, Etihad Towers, Yas Island and more.



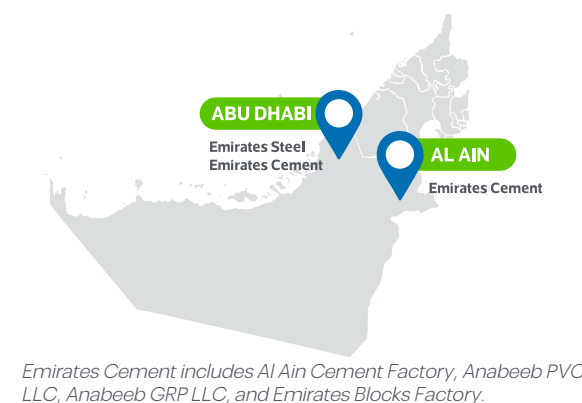
Key Milestones



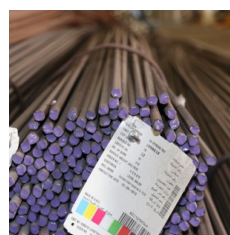
Quick Facts about the Group

EMSTEEL is the largest producer of heavy and jumbo sections and the sole producer of hot rolled sheet piles in the region. We are also the fourth steelmaker in the world to receive the ASME accreditation to produce nuclear grade rebar. We work with customers worldwide to provide tailored solutions, delivered in a timely manner.

These solutions support the construction of cleaner, safer and more durable buildings and infrastructure. EMSTEEL's steel production process comes with 45% less carbon intensity to the WSA global average, owing to various decarbonisation initiatives that have been implemented over the years such as energy efficiency, carbon capture and clean and renewable electricity utilisation.



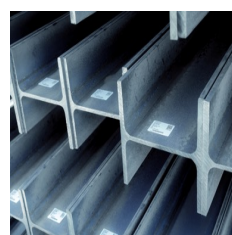
Our Products



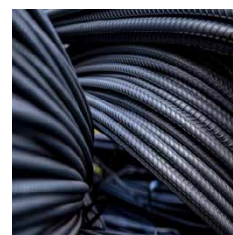
Rebar



Sheet Piles



Heavy Sections



Rebar in Coils



Anabeeb Pipes



Steel Billets



Arkan Bags



Wire Rod



Cement



Concrete Products

Our Production in 2024

Emirates Steel

3.1 million Tonnes of finished steel products: rebar, rebar in coil, wire rod, heavy section, sheet piles, and sold billets

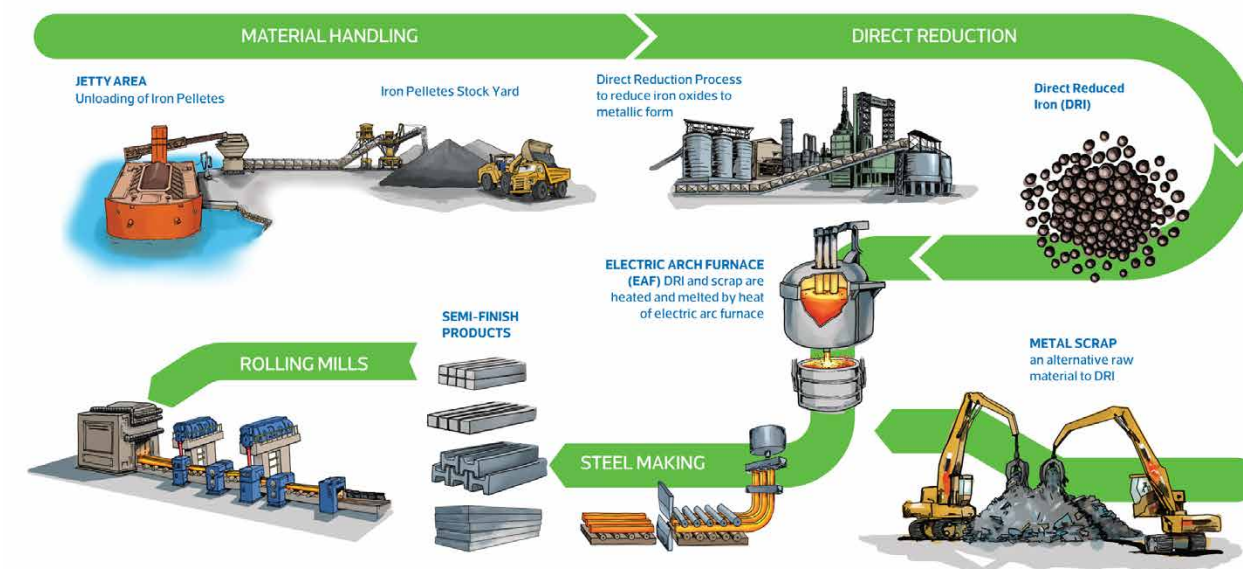
Emirates Cement

1.8 million Tonnes of cement products: Ordinary Portland Cement (OPC), Sulphate Resistant Cement (SRC), Portland Limestone Cement, slag and dry mortar

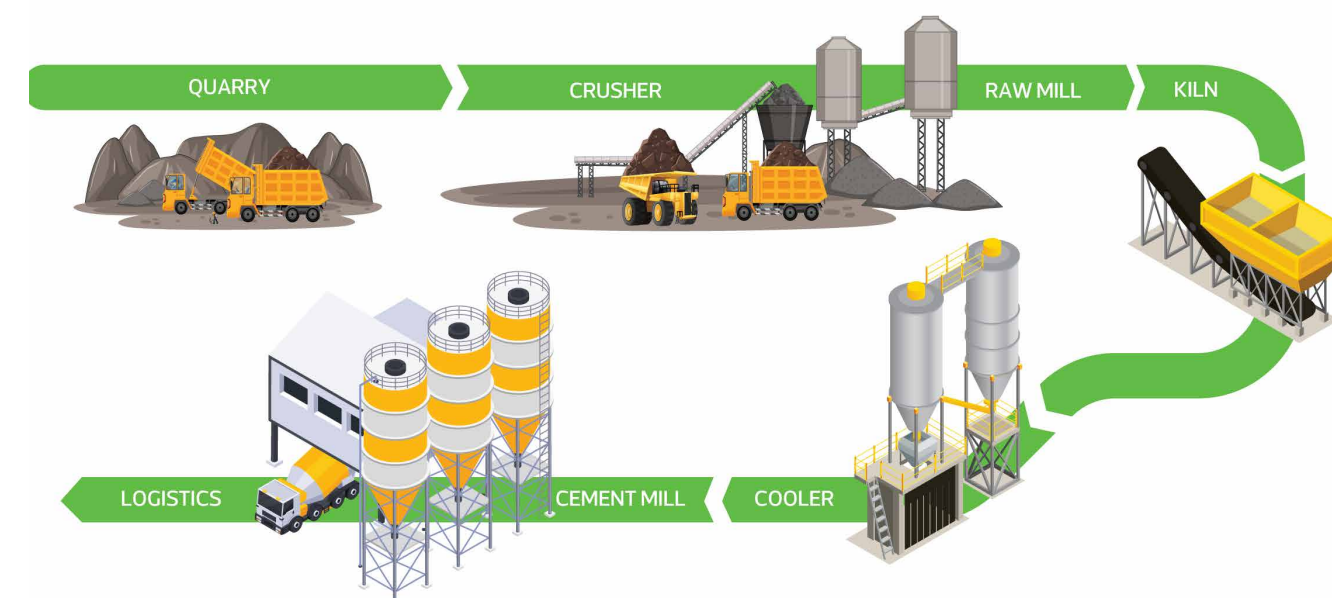
47 million equivalent of blocks, Interlocks and pavers

26 KTonnes of GRP Pipes, GRP Fittings, PVC Pipes, LDPE, PPR, Plastic Bags and Paper Sacks

Steel Value Chain



Cement Value Chain



02

Our Sustainability Management



2.1. Materiality Assessment

The double materiality assessment evaluates the significance of issues from two perspectives: Financial Materiality (outside-in), which assesses the impact of ESG issues on our financial performance and Impact Materiality (inside-out), which evaluates our influence on the environment and the society to our company. To strengthen our ESG Strategy, we conducted a double materiality assessment, followed by a more comprehensive review during the 2024 sustainability report preparation. Additionally, we have incorporated the recommendations from the Corporate Sustainability Reporting Directive (CSRD) to conduct our double materiality assessments. This comprehensive approach ensures effective management of our sustainability priorities.

Recognising the importance of understanding diverse stakeholder perspectives, we annually review our materiality focus.

Our Approach

Identification

36 potential material topics identified

Online Survey

Engaged 500+ stakeholders through an online survey

Analysis & Validation

Both qualitative and quantitative methods were used to analyse survey responses

Our Stakeholders

We actively engage with our stakeholders to ensure that their needs and concerns are addressed, fostering a collaborative and transparent relationship. During the Double Materiality Assessment survey, we have engaged with over 500 global participants from various of our key stakeholder groups, including employees, customers, regulators, our community, and shareholders. More details on our stakeholder engagement can be found in Appendix C.



Results of the Materiality Assessment

The results of the double materiality assessment were divided into three strategic pillars – environmental, social, and governance – aligning with the strategic focus areas of our ESG Strategy. The assessment has identified a total of 12 material topics across environmental, social and governance, being the most material for both the GHG emissions, energy efficiency, health and safety or circular economy and waste.

Environmental

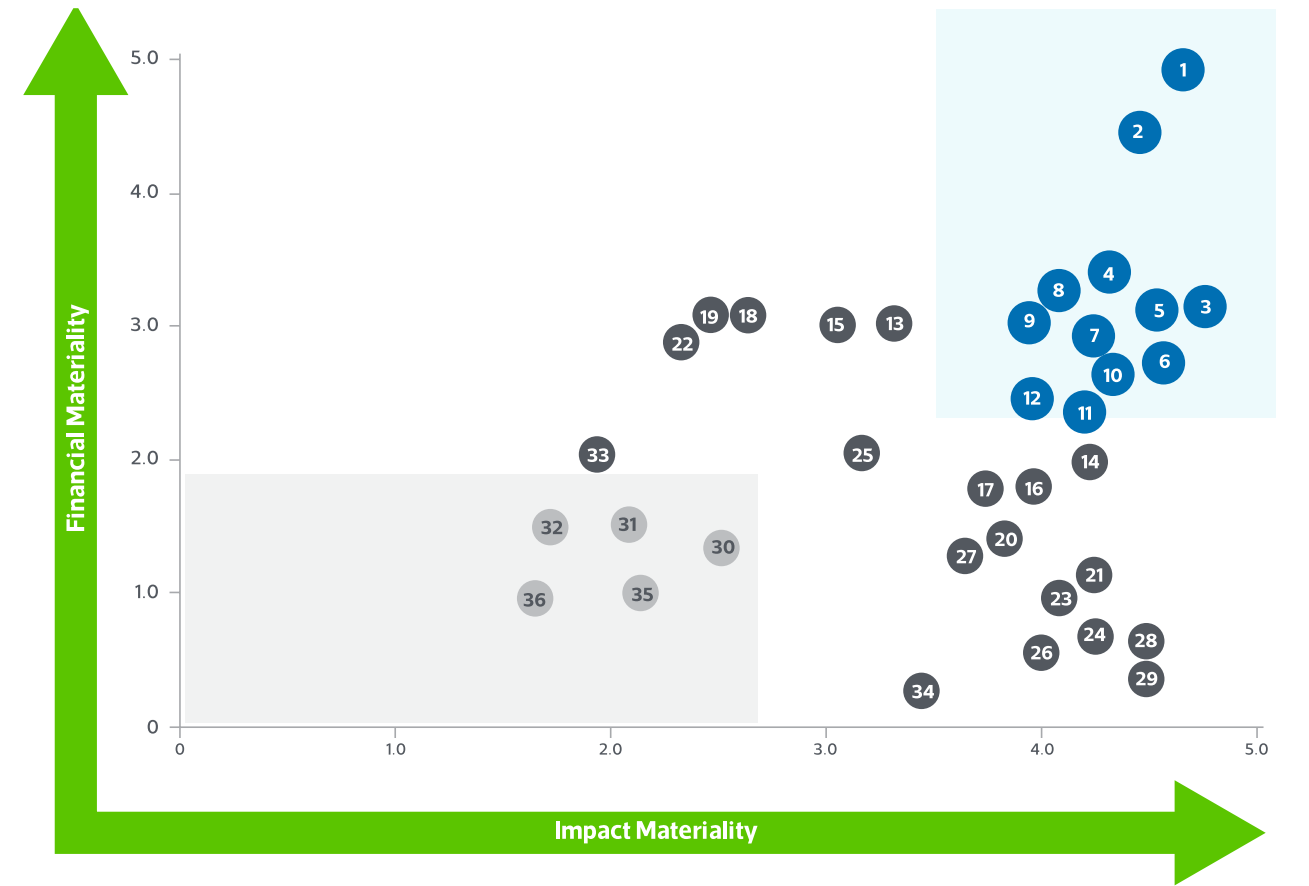
- 1. GHG Emissions
- 2. Energy Management
- 4. Circular Economy/ Waste
- 8-9. Water Management (Consumption & Contamination)

Social

- 3. Health and Safety
- 7. Human Capital Development
- 12. Emiratisation

Governance

- 5. Business Integrity and Ethics
- 10. Corporate Governance
- 11. Responsible Supply Chain
- 6. Customer Engagement



1. GHG Emissions	11. Responsible Supply Chain	20. Air Emissions	28. Product Environment Impact
2. Energy Management	12. Emiratisation	21. Competitive Behaviour	29. ESG Governance/Oversights
3. Health and Safety	13. Economic Performance	22. Stable Production	30. Human Rights
4. Circular Economy and Waste	14. Market Presence and Business Model Resilience	23. ESG Related Transparency and Disclosures	31. Socio-economic Compliance
5. Business Integrity and Ethics	15. Resource Management	24. Labour Management	32. Hazardous Substances
6. Customer Engagement	16. Diversity and Inclusion	25. Climate Change Adaptation	33. Biodiversity and Ecosystems
7. Human Capital Development	17. Product Quality	26. Opportunities in Clean Tech	34. Working Conditions
8. Water Consumption	18. Operational Efficiency	27. Local Community (Community Investment)	35. Data Privacy (Cyber Security)
9. Water Contamination	19. Emergency Preparedness		36. Gender Equality
10. Corporate Governance			

Refer to Appendix D: Double Materiality Assessment for more details.

2.2. ESG Commitments and Targets

Our Group ESG Strategy defines our commitments to environmental stewardship, social responsibility, and governance, and provides a roadmap for achieving our sustainability goals. These commitments are also outlined in our Group ESG Policy, which is periodically reviewed to ensure its relevance and effectiveness. Our governance ensures that the ESG Board Committee oversees the implementation and management of the ESG Policy, and all related guiding principles and strategy related to ESG and Sustainability.

Environmental

EMSTEEL’s critical material topics include GHG emissions, energy management, circular economy and waste and water management. The company aims to significantly reduce emissions intensity and transition to 100% clean and renewable energy mix by 2030, which is essential for combating climate change and promoting sustainability.

GHG Emissions	Energy Management	Circular Economy and Waste	Water and Effluents
Net Zero by 2050 Reduce GHG emissions (scope 1 and 2) by 40% in Steel and 30% in Cement by 2030 from 2019, in line with the UAE’s NDC pathway Work with our supply chain partners to address scope 3 emissions	Set targets to reduce energy consumption and enhance energy performance across our businesses Adopt clean and renewable energy while complying with ISO 50001 standards	Minimise waste generation and enhance recycling efforts across our operations, in adherence to relevant ISO standards, by implementing a comprehensive by-product and waste management program	Reduce water consumption and implement water-efficient technologies that promotes recycled water use, in adherence to ISO 46001

Social

Health and safety is critical, alongside human capital development, Emiratisation and engaging with our customers. Prioritising these topics ensures a safe working environment, promotes workforce diversity, and enhances employee skills, and ultimately contributing to skill force development and community well-being.

Health and Safety	Human Capital Development	Emiratisation	Customer Engagement
Dedicated to uphold ISO 45001 standards, aiming to eliminate hazards and prevent injuries, illnesses, and environmental damage, ensuring the well-being of individuals and preservation of property Continuously improve LTIFR and other health and safety indicators to be above industry benchmarks	Developing a skilled, diverse, and inclusive workforce by investing in human capital growth, training, and fair opportunities	Continuously increase our Emiratisation rates and provide employment opportunities for UAE Nationals and promote skills development	Continue improving customer engagement and satisfaction rates Continue growing our green product portfolio, accompanied by EPDs Integrate ESG customer considerations into CRM processes

Governance

Within its governance strategic pillar, EMSTEEL focuses on business integrity and ethics, corporate governance and responsible supply chain management. By prioritising ethics and transparency, the company aims to build trust with stakeholders and ensure compliance with regulatory standards, fostering long-term sustainability.

Business Integrity and Ethics	Responsible Supply Chain	Corporate Governance
Continue adopting ethics, anti-corruption and compliance best practices beyond local regulations and requirements. Adhere to principles of fair competition	Increase local procurement spent and ICV supplier certification, provide supplier training and fully integrate ESG criteria in supplier selection	Maintain effective internal controls & conduct regular audits to monitor ESG performance

Category	Target	Baseline	Progress in 2024 towards 2030 target
GHG Emissions	Emirates Steel: reduce GHG emissions by 40% by 2030	Year 2019: 3.2 million tCO ₂ e	89% <div></div>
	Emirates Cement: reduce GHG emissions by 30% by 2030	Year 2019: 2.59 million tCO ₂ e*	50% <div></div>
Energy Management	100% of clean energy consumption in 2030 compared to the 2019 baseline	Emirates Steel: Year 2020: 0%	86% <div></div>
		Al Ain Cement Factory: Year 2023: 0%	14% <div></div>
	Reduce energy consumption by 7% until 2030	Emirates Steel: Year 2023: 17.85** GJ/t CrudeSteel	49% <div></div>
		Al Ain Cement Factory: Year 2023: 3.4 GJ/t Cementitious	8% <div></div>
Circular Economy and Waste	Emirates Steel: aims to increase the tons of by-products recycled to 95%	Emirates Steel: Year 2023: 89.9% of Tons of by-products recycled	100% <div></div>
Water and Effluents	Planning for ISO 46001 (water efficiency management system), which will establish targets for water management	Emirates Steel: Year 2023	
Health and Safety	Emirates Steel: target a reduction of TRIR to 0.3 and below by 2030	Year 2019: 0.58	83% <div></div>
Human Capital Development	Double female workforce	Female workforce in Year 2023 = 4%	0% <div></div>
	Planning to increase training to 90-95 hours per employee by 2030	83 hours per employee in 2023	100% <div></div>
Business Integrity and Ethics	Maintain a comprehensive 100% assessment of all assets for corruption risk	Year 2023= 100%	100% <div></div>
Responsible Supply Chain	Emirates Steel aims to Suppliers screened for ESG criteria compliance	Emirates Steel: Suppliers screened for ESG criteria compliance in 2023 = 85%	100% <div></div>
Corporate Governance	Targeting annual ESG related training to its Board members	Year 2023 = 0 Trainings	100% <div></div>

* In 2024, In Al Ain Cement the emissions have been normalised for unplanned shutdowns
** In line with ISO 50001 baseline calculation considering the regression modeling and covering energy consumption from Natural gas, Electricity, and Transportation fuels.



EMSTEEL is fully supportive of the United Nations Sustainable Development Goals (UNSDGs) and aligns its initiatives with the UNSDG goals most relevant to the heavy industrial sector that our operations fall

Environmental



Social



Governance



2.3. Decarbonisation Strategy

Scope 1 and 2

The sustainability topic with the highest degree of influence on our business activities and strategy is GHG Emissions, which ranks as the highest material topic in our double materiality assessment. Decarbonising our operations is therefore our top priority.

Our decarbonisation strategy set in 2024, targets a 40% reduction in GHG emissions in our Steel Business and a 30% reduction in our Cement Business by 2030, using 2019 as the baseline year, and aiming at net zero by 2050. This strategy underscores EMSTEEL's leadership in sustainable manufacturing and its alignment with the UAE's Net Zero by 2050 Strategic Initiative and the Paris Agreement.

To date, we have achieved a notable reduction in Scope 1 and 2 emissions, driven by several key initiatives. Energy efficiency improvements across our businesses have resulted in a 1-2% reduction, while our carbon capture efforts now account for approximately 22% of Emirates Steel's Scope 1 emissions. Additionally, we have expanded our use of clean and renewable energy, reaching 86% at Emirates Steel and 14% at Al Ain Cement Factory.

Scope 3

We are committed to reducing Scope 3 emissions by engaging suppliers in sustainability practices. In 2024, we introduced an ESG and sustainability assessment for Tier 1 suppliers, with plans to expand to Tier 2 and 3. To support this, we launched training programmes on CBAM, the GHG Protocol, ESG principles, ResponsibleSteel standards, and responsible sourcing. Collaboration with raw material suppliers like IOP helps us track Scope 1 and 2 emissions for accurate indirect emissions calculations.

Our strategy includes sustainable procurement of low-carbon materials, alternative fuels to cut fuel-related emissions, and a modal shift from road to rail for transport efficiency. We also prioritise localising suppliers to enhance sustainability. A pilot programme using electric heavy vehicles for local distribution further strengthens our efforts.

We have also adopted the DitchCarbon platform, enabling suppliers to measure, manage, and reduce emissions using their publicly available data and customised reduction strategies.

Our Way to Achieve the Targets

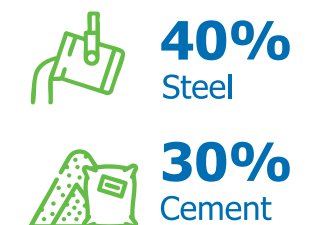
To achieve significant CO₂ footprint reduction as per our decarbonisation strategy, we will continue focusing on implementing key decarbonisation strategies, including enhancing our energy efficiency, as well as incorporating advanced process optimisation technologies and alternative fuels and raw materials in steel and cement production. We will also accelerate the use of clean and renewable energy, to cover 100% of electricity demand by 2030. In the longer term, we also plan to extend our existing carbon capture capabilities to further mitigate emissions from steel and cement production, while fuel switching initiatives will transition operations toward green hydrogen and alternative fuels.



Adherence to International and National Standards

EMSTEEL's decarbonisation targets are aligned with the Paris Agreement and UAE's Nationally Determined Contribution (NDC 3.0) sectoral pathway. Our transition targets significantly exceed the UAE's strategy trajectory, which calls for a 27% reduction in industrial emissions by 2035 from 2019 levels. Our ambitious decarbonisation commitment demonstrates our leadership in driving the UAE's industrial decarbonisation efforts.

Our 2030 Emission Reduction Targets



EMSTEEL is committed to leading the transformation of the construction and manufacturing sectors through sustainable practices. Our decarbonisation strategy not only aligns with the UAE's Net Zero 2050 goals but also positions EMSTEEL as a global leader in low-carbon steel and Building materials production. Through innovation, investment, and collaboration, we are building a more sustainable future for our industry and our planet.



Engineer Saeed Ghumran Al Remeithi,
Group CEO - EMSTEEL

Pioneering UAE Green Steel Production with Green Hydrogen


EMSTEEL, in partnership with Masdar, announced the official launch of the MENA region's first green hydrogen-based pilot facility for green steel production, aiming at accelerating the decarbonisation of the UAE's steel sector. The electrolyzers produce green hydrogen, with certification based on ISO 19870 and validated by an Independent Body Assurance Provider. This project lays the foundation for the large-scale future implementation of green hydrogen to decarbonise the global steel sector.

Extending our initiative to the downstream value chain, we have also established a new strategic alliance with Modon, a major UAE developer. This partnership will make Modon


the first developer in the UAE to use green steel in their projects, supporting the UAE's Net Zero 2050 targets, setting a new benchmark for sustainable and responsible construction practices.




Key Abatement Levers




Carbon Capture




Alternative Fuel Switching and Green Hydrogen




Use of Recycled Steel Scrap and Alternative Raw Materials in Cement




Clean and Renewable Energy



Electrification



Reducing Clinker to Cement Ratio



Energy Efficiency

2.4. Sustainability Governance

At EMSTEEL, we are committed to integrating sustainability into our core governance framework. Our ESG targets outline our strategic priorities and guide our efforts to long-term value creation for our stakeholders.

In 2024, we have launched a four-tier sustainability governance model, with the ESG Board Committee, followed by the ESG Steering Committee chaired by the Group CEO, cascading down to a dedicated Group function headed by the Vice President of ESG and Sustainability, that regularly interacts with a cross-functional ESG and Sustainability Centre of Excellence (CoE).

The ESG Committee was appointed by our Board of Directors as a forum to provide

oversight and make decisions regarding actions necessary to meet ESG and sustainability goals and set necessary policies, procedures, and strategic direction across EMSTEEL and its subsidiaries.

The ESG Steering Committee acts as an advisory body for EMSTEEL group management for all ESG and Sustainability-related requirements or mandates.

Our multi-tier sustainability governance structure ensures alignment on priorities across the organisation and regular monitoring and performance reporting of initiatives and sustainability metrics.



2.5. ESG Ratings

At EMSTEEL, ESG ratings are critical in shaping our sustainability strategy, strengthening our market position, and enhancing transparency. In 2024, we made significant progress across multiple assessments, reaffirming our commitment to continuous improvement. Our CDP Climate Change Rating improved from B- to B, reflecting our proactive approach to emissions reduction. For the first time, our water management practices were evaluated, earning a B- rating. Under the CARES framework, we advanced from a Pass to a Very Good rating in responsible sourcing and maintained our Rosette certification for sustainability management, reinforcing our commitment to ethical supply chains and strong governance. Additionally, we received our first rating from Sustainalytics, scoring 32.3, offering valuable insights to further strengthen ESG risk management within our operations.

Sustainability Rating		2023 Score	2024 Score
	Climate	B-	B
	Water	N/A	B-
	Responsible Sourcing	Pass	Very Good
	Sustainability Management	Maintained our rosette in 2024	
	(New)	32.3	

Case Study:

COP 29

At COP29 in Baku, we have demonstrated our leadership on sustainable industrial transformation by participating into a number of events and panels, to explore the potential of renewables and green hydrogen in reducing emissions from energy-intensive industries, as well as on the role of other decarbonisation technologies on accelerating the energy transition. The need for collaborative efforts across the value chain was reinforced at the event, and our commitment to innovation and sustainability was underscored through sharing insights on pioneering projects and strategic partnerships. As the largest publicly listed steel and building materials company in the UAE, impactful change is being driven in alignment with the UAE's Net Zero by 2050 agenda, and a better tomorrow is envisioned to be built through collaboration and unwavering commitment.



Material Topics

Energy Management
GHG Emissions
Circular Economy & Waste
Water Management

03

Decarbonisation and Environmental Stewardship

UN Sustainable Development Goals



At a time where environmental responsibility drives industry standards, EMSTEEL is dedicated to leading the steel and building materials sectors towards sustainable future. We are striving to improve our raw materials, energy, and water use efficiencies, whilst continuously implementing initiatives to reduce our greenhouse gas emissions in line with our decarbonisation strategy.

3.1. Environmental Controls & Management Systems

At EMSTEEL, we adhere to a robust environmental framework aligned with UAE federal guidelines and international standards, such as ISO 14001 and ISO 50001. Last year we introduced our Group Environment, Social, and Governance (ESG) Policy to guide our sustainability efforts and drive the implementation of our ESG Strategy.

To ensure compliance with global environmental standards, we maintain certification to ISO 14001 for environmental management across all our operations. Our sustainability plan sets specific goals to enhance our performance, supported by our Integrated Management System (IMS) to minimise environmental impact. Our IMS Policy covers the requirements of ISO 14001/ 50001/ 46001.

We are dedicated to integrating environmental protection, sustainability, and resource efficiency into our core operations. The company ensures strict compliance with all applicable environmental laws, regulations, and standards, while proactively identifying

and managing risks related to climate change, biodiversity, energy, water, and resource utilisation.

We conduct environmental and energy internal and external audits at least once per year covering 100% of our operation, with higher frequency for critical areas. These audits drive our sustainability initiatives, help mitigate pollution, and safeguard biodiversity.

Our Operational Environmental Management Plan (OEMP) includes a comprehensive monitoring schedule to ensure ongoing sustainability and environmental responsibility.

OEMP audits are conducted four times a year by an external party to ensure our compliance with regulatory requirements. We also monitor critical environmental aspects including:

- Ambient air quality
- Ambient marine water and sediment
- Stack emissions
- Wastewater discharge & sludge management
- Ambient noise levels



4 OEMP external audits with no major non-conformity in 2024



45 Environmental inspections with all observations closed

- Recycled water for irrigation and groundwater
- We employ advanced technologies and systems, such as the online Continuous Emission Monitoring System (CEMS) and regular stack emissions sampling. Our goal is to reduce emissions by continuously monitoring our progress by tracking exceedances, closing actions and conducting trend analyses.

We prepare a comprehensive annual environmental monitoring report, which is approved by a third-party independent consultant. The report encompasses detailed measurements of indoor air quality, dust, and particulate matter within our plants.

Additionally, we conduct frequent noise level monitoring to ensure compliance with the Environment Agency - Abu Dhabi (EAD).

Our employees receive regular comprehensive training on environment and sustainability related topics. This year we have successfully conducted more than 20 training sessions covering areas such as environmental pollution and waste management, environmental permits, environmental aspects and impacts and ISO 50001 - Energy Management System. We established virtual trainings focusing on sustainability, ESG, decarbonisation, and pollution prevention.

In alignment with our commitment to environmental stewardship, we proudly celebrated World Environment Day for the first time by hosting a dedicated event aimed at fostering sustainability awareness among our employees. The event was attended by the Executive Director of Environmental Information, Science, and Outreach from the Environment Agency - Abu Dhabi (EAD), reinforcing our collaborative efforts toward environmental responsibility.

A key highlight of the event was the introduction of EAD's 'Baadr' initiative, a pioneering programme designed to

drive sustainable behavioural change through incentivised environmental actions. EMSTEEL was honoured as the first industrial entity to officially join the programme, with an ambitious goal of onboarding more than 3,000 employees onto the platform.

Launched in 2022, the 'Baadr' application—meaning 'Initiate' in Arabic—encourages individuals to adopt environmentally friendly habits such as recycling, reducing single-use items, and participating in sustainability-driven activities. By leveraging a rewards-based system, the initiative promotes long-term engagement

and a culture of environmental responsibility across organisations.

During the event, EAD and EMSTEEL executives recognised employees and departments that demonstrated exceptional environmental performance over the past year. This acknowledgment reflects our ongoing commitment to integrating sustainability into our corporate culture and operation.

BAADR

3.2 Energy and Emissions



GRI Standards: 302 (2016) & 305 (2016)
CARES SCS: 3.3, 3.5, 3.6 & 3.7

We are dedicated to significantly reducing our greenhouse gas emissions to combat climate change and promote sustainability. Our goal is to achieve net zero emissions by 2050, in line with the UAE Net Zero Strategy, through continuously monitoring and reporting of our emissions, adopting innovative decarbonisation and energy saving technologies and promoting the use of clean energy and circularity.

We measure and monitor carbon and energy intensity across our facilities by adhering to the GHG Protocol and ISO 14404 standards for iron and Steel production. We also adhere to the Cement CO₂ and Energy Protocol by World Business Council for Sustainable Development (WBCSD) and Global Cement and Concrete Association (GCCA).

Energy

We are committed to enhancing our energy performance by implementing energy-efficient technologies, adopting renewable energy sources, and adhering to ISO 50001 standards. We are certified for ISO 50001 for energy management in the Cement Business Unit and have successfully completed the ISO 50001 Stage 1 external audit for our Steel Business, aiming to achieve full certification in 2025. Our ESG and IMS Policies incorporate energy considerations.

We carry out independent third-party audits to assess energy consumption and establish reduction targets. We also collaborate with the World Steel Association (WSA) by participating in their Climate Action data collection programme, which allows us to calculate and monitor carbon and energy intensity in line

with ISO 14404. Our comprehensive approach to energy monitoring includes Integrated Management System (IMS), Balanced Scorecard (BSC), and KPIs to track performance metrics.

In 2024, EMSTEEL made significant progress in its transition towards renewable energy sources. Our clean electricity sourcing increased by 2% compared to 2023 in Emirates Steel, reaching 2,105,666 MWh, with clean energy now accounting for 86% of total electricity consumption. Emirates Steel utilised 1,469,069 MWh from nuclear energy certificates and 636,617 MWh from solar energy certificates. Similarly, Emirates Cement utilised 29,996 MWh from both nuclear and solar energy certificates, with clean energy now accounting for 14% of total electricity consumption.



86%
of our electricity in
Emirates Steel comes from
clean and renewable sources



Table 3 -1. Energy Consumption (EMSTEEL Group)

Description	2021	2022	2023	2024
Total Fuel Consumption from non-renewable sources (TJ)	57,523	57,331	58,037	55,088
Total Electricity consumption (TJ)	10,165	9,811	9,774	9,635
Total Energy Consumption (TJ)	67,688	67,142	67,812	64,723
Energy Consumption (by business)				
Emirates Steel (TJ)	56,149	54,433	56,428	55,734
Al Ain Cement Factory (ACF) (TJ)	11,334	12,492	11,158	8,793
Blocks (TJ)	160	172	178	51
Anabeeb (TJ)	44	44	48	45
Energy Intensity (by business)				
Emirates Steel (GJ / tonnes of crude steel)	18.58	16.95	17.43	17.13
Al Ain Cement Factory (ACF) (GJ/tonne of cementitious material)	3.68	3.60	3.40	3.38
Anabeeb (GJ/tonne)	1.44	1.76	1.61	1.74



Furthermore, for Al Ain Cement Factory (ACF), we have begun sourcing clean energy, covering 14% of our electricity usage. This reflects our ongoing commitment to increasing clean energy adoption and reducing our carbon footprint.

We have achieved reductions in both total energy consumption and energy intensity, of 1% and 2% respectively, compared to 2023 for Emirates Steel. The reduction in both the energy consumption and energy intensity was even more notable in our Al Ain Cement Factory compared to 2023, 21% and 0.6%, respectively.

The reduction in the energy consumption is partly due to the implementation of energy management system along with energy saving projects, as well as some external factors impacting our production.

Energy saving projects implemented in 2024 include:

- Increase Feeding Hot Direct Reduced Iron temperature by 30 °C at Steel Making Plants to use less energy for melting
- Improving Electric Arc Furnace (EAF) Efficiency at Steel Making Plant (SMP) 1 to use less energy
- Smart Furnace Control using sensors to monitor gases and adjust electrodes automatically, saving energy
- Optimising EAF & Ladle Refining Furnace (LRF)

Processes for smoother and more efficient steel production to reduce energy waste

- Rolling Mill (RM)1 Reheating Furnace (RHF) fuel optimisation by installing a new recuperator

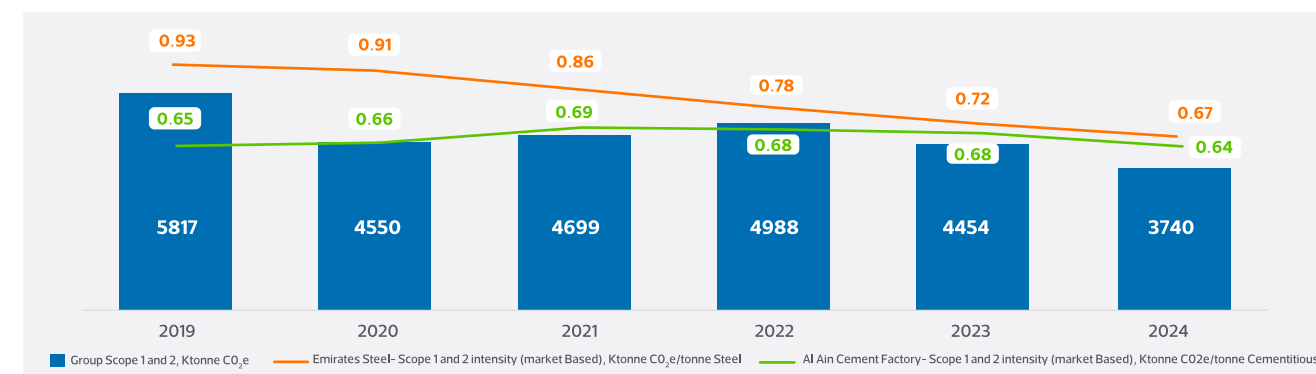
 **8M USD** savings due to energy efficiency measures in 2024

Emissions

GHG emissions are not just a key area of focus for us; they represent the highest-rated material topic for EMSTEEL. Our emission reporting comprehensively covers all our operations. As a responsible producer of steel and building materials, we are deeply committed to addressing and mitigating our GHG emissions.

This year in Emirates Steel we were able to reduce our scope 1 direct emissions by 6%, scope 2 location-based indirect emissions by 9.5% and scope 2 market-based indirect emissions by 23%, compared to 2023. We also achieved a 7% reduction in the intensity of our total scope 1 and 2 emissions compared to 2023.

Our emissions reductions in 2024, reflect our focus on implementing a number of energy savings measures, carbon capture and the increased sourcing of clean energy certificates. It is also attributed to unplanned shutdowns due to extreme weather events in the first half of the year.



The company aims to achieve net zero by 2050, with interim targets of reducing Scope 1 and 2 emissions by 40% in Steel and 30% in Cement by 2030, using 2019 as the baseline year. As part of our commitment to transparency, we report our CO₂ emissions performance to the Industrial Development Bureau (IDB) and the UAE Ministry of Climate Change and Environment (MOCCA). As a committed member of the Worldsteel Climate Action Programme and Worldsteel Sustainability Charter, our products adhere to esteemed eco-friendly rating systems, such as LEED, ESTIDAMA, and Pearl.

Decarbonisation International Recognition

The World Economic Forum has recognised EMSTEEL as one of the top five steel producers worldwide for our pioneering efforts in decarbonising steel production. This achievement highlights our commitment to innovation, environmental stewardship and strategic goals for market expansion and competitiveness.

 **23%** Reduction in scope 2 emissions (market-based) in Emirates Steel compared to 2023

 **LOWEST** GHG emission intensity of 0.67 tCO₂e/t recorded in Emirates Steel since 2019

Table 3-2. GHG Emissions – Emirates Steel

Description	2019	2020	2021	2022	2023	2024
Total direct scope 1 (Ktonne CO ₂ e)	2346	1905	2095	2194	2105	1979
Total indirect scope 2 (location-based) (Ktonne CO ₂ e)	857	630	564	625	614	556
Total indirect scope 2 (market-based) (Ktonne CO ₂ e)	857	630	458	411	100	78
Total indirect scope 3 (Ktonne CO ₂ e) *	2978	2631	2907	2041	1928	1427
Scope 1 + 2 intensity (market-based) (tonne CO ₂ e/tonne of steel)	0.93	0.91	0.86	0.78	0.72	0.67
Scope 1, 2 and 3 intensity (tonne CO ₂ e/tonne of steel)	1.79	1.86	1.83	1.39	1.34	1.13

*Scope 3 covers: Purchased goods and services, fuel and energy-related activities, upstream transmission and distribution, waste and water, employee commuting, downstream transportation and distribution, processing of sold products, and end-of-life treatment of sold products.

Case Study:

EMSTEEL Participation at Climate Week NYC

EMSTEEL had a significant presence at Climate Week NYC by engaging with industry partners on discussions about sustainable practices and decarbonisation of the heavy industry. Despite rapid renewable energy adoption, current progress remains insufficient to meet the Paris Agreement’s targets, highlighting the need for accelerated, collaborative efforts – especially in sectors like steel and cement. In parallel, we have assumed a prominent role in global sustainability leadership by serving as co-chair of the Alliance for Industry Decarbonisation (AFID), a global initiative led by the International Renewable Energy Agency (IRENA). Announced during New York Climate Week, this role underscores EMSTEEL’s commitment to collaborative action in decarbonisation, as the Alliance 84 members setting joint targets that include nearly tripling renewable energy production and reducing greenhouse gas emissions by 54% by 2030. Through these integrated efforts, EMSTEEL reaffirms its position as a leader in sustainable steel and building materials manufacturing, paving the way for continued progress and collective climate action.



In the ACF our scope 1 direct emissions and scope 2 indirect emissions reduced by 25% compared to the previous year. We also achieved a 6% reduction in the intensity of our total scope 1 and 2 emissions compared to 2023.

This is attributed to utilising increased levels of clean energy in 2024, which now covers approximately 14% of our Scope 2 emissions. Also, two significant projects were launched – Operational Excellence and Raw Material Mix Design aimed at improving energy efficiency and reducing our GHG emissions. However, there were also multiple shutdowns in 2024, due to mainly inclement weather conditions in the first half of the year, that impacted our planned production and contributed to lower overall emission levels

Table 3-3. GHGs - Al Ain Cement

Description	2019	2020	2021	2022	2023	2024
Total direct scope 1 (Ktonne CO ₂ e)	2490	1922	2069	2297	2168	1626
Total indirect scope 2 (market-based) (Ktonne CO ₂ e)	98	74	59	65	62	48
Total indirect scope 2 (location-based) (Ktonne CO ₂ e)	97.9	74.0	58.7	65.3	62.2	40.9
Total indirect scope 3(Ktonne CO ₂ e) *	737	520	488	484	526	559
Scope 1 + 2 intensity (tonne CO ₂ e/tonne of cementitious material)	0.65	0.66	0.69	0.68	0.68	0.64
Scope 1, 2 and 3 intensity (tonne CO ₂ e/tonne of cementitious material)	0.84	0.83	0.85	0.83	0.84	0.86

*Scope 3 covers: Purchased goods and services, fuel and energy-related activities, upstream transmission and distribution, waste and water, employee commuting, downstream transportation and distribution, processing of sold products, and end-of-life treatment of sold products.

Table 3-4. GHGs - Blocks

Description	2019	2020	2021	2022	2023	2024
Total direct scope 1 (Ktonne CO ₂ e)	14.1	9.1	10.5	11.9	11.9	11.0
Total indirect scope 2 (Ktonne CO ₂ e)	3.0	2.9	2.0	2.0	2.1	1.6
Total indirect scope 3 (Ktonne CO ₂ e) *	85.5	80.1	76.3	82.0	80.0	70.8

*Scope 3 covers: Purchased goods and services, fuel and energy-related activities, upstream transmission and distribution, waste and water, employee commuting, downstream transportation and distribution, processing of sold products, and end-of-life treatment of sold products.

Table 3-5. GHGs– Anabeeb

Description	2019	2020	2021	2022	2023	2024
Total direct scope 1 (Ktonne CO ₂ e)	4.6	3.3	3.4	4.0	1.7	1.1
Total indirect scope 2 (Ktonne CO ₂ e)	3.9	3.8	2.5	2.7	3.0	2.8
Total indirect scope 3 (Ktonne CO ₂ e) *	67.5	87.7	66.5	63.3	67.8	58.7

*Scope 3 covers: Purchased goods and services, fuel and energy-related activities, upstream transmission and distribution, waste and water, employee commuting, downstream transportation and distribution, processing of sold products, and end-of-life treatment of sold products.



Other Air Emissions

Monitoring and reducing air emissions pollutants is a key area of focus for EMSTEEL. We utilise advanced technologies such as CEMS and regular stack sampling to comply with permissible limits. Our emissions log sheet tracks exceedances, closure actions, and conducts trend analysis to ensure continuous improvement.

As a proactive measure, Emirates Steel has set internal emission limits that are stricter than regulatory requirements. Additionally, we have established a robust CEMS management and communication system to enhance monitoring, recording, and tracking of emission deviations, enabling timely countermeasures before reaching the set limits.

Pollutant	Unit	2024
Particulate Matter (PM)	tonnes	312
Sulphur Oxides (SOX)	tonnes	394
Nitrogen Oxides (NOX)	tonnes	1124
Carbon Monoxide (CO)	tonnes	2771

In 2024, Emirates Steel implemented a comprehensive three-point calibration process that significantly enhanced the accuracy of our emissions measurements. We made substantial adjustments to our sensors, which improved their performance and reliability in capturing emission data. Furthermore, we added an additional stack for Continuous Emissions Monitoring Systems (CEMS), increasing the total number of CEMS stacks to nine. We are also committed to installing additional CEMS systems to cover all process stacks by the end of 2025. In our efforts to minimise environmental

impact, Emirates Steel recorded a release of 89 kg of R22 (HCFC-22) in 2024, marking a significant reduction from 180 kg in 2023. R22 is classified as a hydrochlorofluorocarbon (HCFC) and is recognised as an ozone-depleting substance (ODS) commonly used as a refrigerant gas. In alignment with our commitment to environmental sustainability and regulatory compliance, we are actively working towards the complete phase-out of all R22 sources, with a goal to transition to non-ODS refrigerants by 2030. This initiative reflects our dedication to fostering a sustainable future and reducing our ecological footprint.

Transport Impact

We are actively working to reduce the environmental impact of our transportation activities. Fuel consumption is monitored monthly and reported as greenhouse gas (GHG) impact.

Additionally, effective traffic management and transport logistics are crucial for our sustainability efforts. We regularly monitor these activities, including air and bus transport, and maintain a transport impact record. Transportation impact assessments are integrated into our OEMP and EIA.

We now record employee commuting journeys to enhance our calculation of Scope 3 emissions. This initiative allows us to accurately assess the GHG emissions associated with our workforce's travel patterns.

We plan to lower our vehicle fuel consumption by incorporating electric buses and vehicles into our operations, which will enhance our efforts to reduce transport emissions.

3.3. Waste and Circular Economy



GRI Standards: 301 (2016), 306 (2020)
CARES SCS: 3.2 , 3.7

We are committed to responsible waste management and reduction practices to minimise our environmental footprint. Our circular economy approach optimises the production cycle, extends the life cycle of materials, and fosters long-term sustainability.

Our approach prioritises waste minimisation through initiatives such as reusing scrap and packaging materials. We ensure efficient waste segregation by carefully classifying and categorising waste and maximising recycling opportunities.

On-site facilities provide convenient waste collection and storage, while authorised service providers, approved by the Centre of Waste Management Abu Dhabi (CWM), manage the collection, transport, treatment, and disposal of waste. We maintain detailed waste inventories and documentation to ensure compliance with all relevant laws and regulations.

In 2024, we achieved 99.3% material efficiency (a World Steel Association KPI), which involves tracking the total tonnes of raw materials used against the total tonnes of products produced. In the same year, by-product sales increased by 7% compared to 2023.

Notably, the dispatch/sales volume in 2024 was 34% higher than the total by-product generation, highlighting efficient utilisation and effort in commercialising our by-products. Our zero-by-product stock initiative, effectively eliminated storage bunker stock. We also collaborated with Tadweer's in their 'Waste to Zero' initiative. and implementing the SAP waste tracking system.

Emirates Steel aims to increase by-product recycling from 89.9% to 95% and waste sent to

recycling from 60.38 to 63.40 kg/ton by 2030, with a 0.7% annual increase. Simultaneously, landfill waste will be reduced from 7.80 to 7.42 kg/ton, aligning with its ESG strategy.

Waste Handling

We adhere to ISO 14001 and ISO 45001 standards, which includes safe handling and disposal of waste materials. In 2024, we took additional steps towards implementing a holistic waste management approach by following a waste management plan (WMP) for each department, section and main contractor. The plan includes waste specification, source of generation, classification, methodology and the annual quantity generation.

We implemented the Waste Disposal System (WDS), introduced through SAP to collect data of waste and by-products from the whole plant from the point of generation until disposal and efficiently manage the collection process. The system allows us to optimise waste management and sustainability programmes within EMSTEEL.

We minimise waste generation by ordering raw materials in bulk wherever possible, reducing unnecessary packaging. Additionally, we prioritise preventive maintenance for our machines to prevent waste resulting from unexpected breakdowns. Furthermore, we conduct regular risk assessments and internal audits to assess the impact on our operations and the company's compliance and performance in waste management.

Our WMP guides us in evaluating the measures that need to be taken to reduce the quantity of hazardous and non-hazardous waste produced

as well as hazardous waste toxicity. This year, we have achieved significant milestones, including generating USD 15 million in revenue from solid waste sales while preventing approximately 17 tons of dust emissions.

These efforts ensure that we remain aligned with our vision of fostering a sustainable and environmentally responsible future, continually improving our waste management practices to meet and exceed industry standards.



17 Tonnes of dust emission are prevented through the sale of solid waste

We take every opportunity to prevent and minimise waste across our different activities. In 2024, a total 211,329 tonne of solid waste was generated with 98% of this value classified as non-hazardous waste and only 2% classified as hazardous waste. There was a decrease in the total solid waste value by 7% when compared to last year.

The total amount of waste directed to landfill was 21,609 tonnes, which represents only 10% of the total waste generated. We actively promote a circular economy by implementing recycling initiatives. Additionally, through the BAADR programme, we have strengthened our

Table 3-6. Waste Generation Classification Data

	Unit	2020	2021	2022	2023	2024
Emirates Steel						
Hazardous Waste	KTonne	9.0	3.3	4.5	3.9	4.8
Non-hazardous Waste	KTonne	39.3	189.6	255.8	217.2	195.0
Al Ain Cement Factory (ACF)						
Hazardous Waste	KTonne	0	0.002	0	0	0
Non-hazardous Waste	KTonne	1.7	2.9	1.1	0.3	0.6
Emirates Blocks Factory						
Hazardous Waste	KTonne	0	0	0	0	0
Non-hazardous Waste	KTonne	4.9	1.3	3.7	3.5	9.3
Anabeeb						
Hazardous Waste	KTonne	0	0	0	7	8.6
Non-hazardous Waste	KTonne	1.4	1.1	1.1	1.6	1.7


commitment to environmental sustainability by raising awareness among our employees and promoting eco-friendly initiatives.

Key benefits of the programme include improved environmental consciousness, distributing of water smart bottles to reduce plastic bottles use and track water consumption. Our employees received credit point as rewards for their active participation in the initiatives offered by BAADR programme. These efforts contribute to a greener, more sustainable future while reinforcing our environmental responsibility. Highlights of this year’s initiatives:




Employee Waste Recycling contribution programme

Allowing employees to bring waste from their home, promoting responsible disposal and waste segregation practices beyond the workplace.



Recycling Campaign week

A week-long programme to raise awareness on recycling and sustainability.



Shopping Bags - no single use plastic

We distributed approximately 1,500 eco-friendly reusable shopping bags to employees and contractors.



7%

Reduction in waste generated

Table 3-7. Waste and by-product Data

	Unit	2020	2021	2022	2023	2024
Emirates Steel						
Sold/Recycled	KTonne	614.0	735.9	865.6	859.8	763.4
Reuse	KTonne	18.2	206.6	301.2	245.3	189.7
Incinerated	KTonne	1.2	0.3	0.4	0.4	0.8
Landfilled	KTonne	37.6	29.9	27.2	25.3	21.6
Al Ain Cement Factory (ACF)						
Landfilled	KTonne	2.4	0.4	0.3	0.3	0.6
Emirates Blocks Factory						
Landfilled	KTonne	4.9	1.3	3.7	3.5	9.3
Anabeeb						
Sold/Recycled	KTonne	0.03	0.05	0.03	0.03	0.03
Incinerated	KTonne	0	0	0	0	0.01
Landfilled	KTonne	1.4	1.1	1.1	1.1	1.1

Circular Economy

We are dedicated to sustainable steel production by integrating both in-house and purchased scrap into our manufacturing process. Through our efficient shredding and recycling system, we transform collected scrap into high-quality steel products. This approach not only conserves resources and reduces energy consumption, but also aligns with the principles of a circular economy, promoting a more environmentally responsible and resource-efficient steel production process.

At Anabeeb, we process polyvinyl chloride (PVC) pipes by crushing them for reuse as raw materials. Glass Reinforced Plastic (GRP) pipes are cut into small pieces and subsequently disposed in a landfill by an authorised third-party service provider.

Last year, by-product sales increased by 7% compared to 2023. Additionally, the sales volume in 2024 was 34% higher than the total by-product generation, demonstrating efficient stock management.

As for ACF, it utilised 3.8 million tonnes of materials, with approximately 2% of the materials are recycled input materials.

In EBF approximately 19% of our total materials consumption comes from renewable resources, while in Anabeeb, renewable materials account for around 10.4% of the total material consumption.

We recognise the vital importance of incorporating recycled materials into our production processes and are committed to exploring new technologies and initiatives to increase their proportion in the future.

Aligning with our vision to become a sustainable leader towards a greener future, we promote sustainable use of materials.

In 2024, Emirates Steel used 5.7 million tonnes of materials, with 7.5% being recycled scrap. This represents a 5% decrease in the use of renewable sources compared to 2023.



430 k Tonnes

of recycled scrap utilised in 2024 in Emirates Steel

Table 3-8 Materials Data

	Unit	2020	2021	2022	2023	2024
Emirates Steel						
Non-renewable Materials	KTonne	4,380.1	5,471.3	5,151.7	5,449.3	5,295.5
Renewable Materials	KTonne	245.2	188.7	276.2	450.7	430.2
Al Ain Cement Factory (ACF)						
Non-renewable Materials	KTonne	4,621.7	4,715.9	5,561.9	5,062.3	3,839.7
Renewable Materials	KTonne	0.8	1.6	1.6	1.4	2.2
Emirates Blocks Factory						
Non-renewable Materials	KTonne	-	-	1,510.4	1,489.4	921.4
Renewable Materials	KTonne	-	-	363.7	385.1	210.0
Anabeeb						
Non-renewable Materials	KTonne	31.3	20.1	19.8	26.0	24.0
Renewable Materials	KTonne	4.4	4.0	3.9	3.5	2.8

Creating Sustainable Building Materials by Localising Circularity Initiatives

EMSTEEL and, Tadweer Group, Abu Dhabi's waste management and recycling services leader, have signed a Memorandum of Understanding (MOU) to explore the use of alternative fuels and raw materials in creating green building materials. The agreement focuses on harnessing Tadweer Group's production of Refuse Derived Fuels (RDF) and Construction and Demolition Waste (CDW) in EMSTEEL Group's plants,

including Al Ain Cement Plant and Emirates Block Factory.

The partnership aims to promote sustainable building practices by reducing waste sent to landfills, lowering CO₂ emissions, collaborating with local partners, advancing the manufacture of green building materials, and enhancing In-Country Value (ICV).

EMSTEEL and MAGSORT launch a pilot project to reduce CO₂ emissions by 15% in Emirates Cement

Demonstrating our commitment to UAE Net Zero by 2050 initiative, EMSTEEL announced its strategic collaboration with MAGSORT, a Finnish decarbonisation company, to drive an innovative initiative in its Al Ain Cement Factory. The partnership, announced during CEMTECH MEA 2024, positions EMSTEEL's cement operations at the forefront of sustainability, aligning seamlessly with the Group's decarbonisation targets and setting the stage for a transformative approach to Green Cement production.

The collaboration between EMSTEEL and MAGSORT will initiate in Al Ain Cement plant the first large scale industrial pilot

project, targeting a CO₂ footprint reduction of up to 15% by implementing the proprietary MAGSORT solutions to process steel slag, while reducing both limestone and fuel consumption.

EMSTEEL and MAGSORT anticipate that this forward-thinking initiative will serve as a model for sustainable practices within the UAE Building Materials industry. The collaboration emphasises the practicality and benefits of decarbonisation in cement, aligning with the global sustainability goals.

3.4. Water & Effluents



GRI Standards: 303 (2018)
CARES SCS: 3.3

Given the location of our production plants in the water-scarce GCC region, we are committed to sustainable water management and continuous improvement. We prioritise efficient water use to ensure sustainability. We continuously assess our water impact and the social and environmental consequences of our projects.

Utilising methodologies like EIA and OEMP we ensure compliance through quarterly audits by external auditors and reviews by the EAD. To optimise water usage, we have invested in advanced water treatment infrastructure, including Reverse Osmosis (RO) plants and on-site Water Treatment Plants (WTPs). Wastewater is managed by approved Environment Service Providers (ESPs).

We promote water conservation at all our facilities through collaborations with the TAQA Distribution and initiatives such as efficient water usage agreements, monthly monitoring of irrigation water, and exploring recycling and reusing sewage and stormwater for irrigation.

Our ESG Strategy sets water intensity targets in Emirates Steel and Emirates Cement.

Water Recycling

At Emirates Steel, we prioritise sustainability through our water recycling initiatives. We operate water treatment plants designed to recycle and minimise water usage, particularly for cooling purposes in our operations.

In 2024, our water withdrawal reached 9.3 million cubic metres, which was 2% higher than 2023. Similarly, water intensities were generally higher than last year as well.

Water Efficiency Study

In 2024, we have conducted a water efficiency study to support establishing a water managements system as per ISO 46001, focusing on efficient water use through reduction, replacement, or reuse.

We have also established a water risk register focusing on all our operation.

Irrigation Water Meter:

Dedicated to monitoring monthly consumption.

Water Conservation Plan

Developed for Anabeeb to optimise water use.

Table 3-9. Water Consumption Data

Water Consumption Data	Unit	2020	2021	2022	2023	2024
Total Water Withdrawal/Reclaimed (EMSTEEL Group)						
Total	000 m³	7,788.5	8,954.2	9,215.2	9,065	9,276.8
Third-party Water*	000 m³	975.9	1,293.9	1,356.1	1,402.1	1,448.2
Fresh Water**	000 m³	6,812.6	7,660.3	7,859.1	7,662.9	7,828.6
Total Water Discharge Destination (EMSTEEL Group)						
Total	000 m³	1,631.8	1,899.9	1,798.4	1,832.9	2,080.7
Third-party Water*	000 m³	5.0	2.4	5.7	0	6.2
Seawater	000 m³	1,624.9	1,894.5	1,790.3	1,830.7	2,072.5
Total Water Consumption (EMSTEEL Group)***						
Total	000 m³	6,157.2	7,054.3	7,427.5	6,854.9	7,272.7
Net Water Use (breakdown by business unit)						
Emirates Steel	000 m³	5,811.5	6,592.9	6,977.6	6,742.1	6,809.6
Al Ain Cement Factory (ACF)	000 m³	232.9	322.4	329.3	371.2	342.8
Emirates Blocks Factories (EBF)	000 m³	66.2	81.0	76.0	74.6	74.5
Anabeeb	000 m³	46.5	58.0	44.7	38.2	45.8
Water Use Intensity (breakdown by business unit)						
Emirates Steel (Water withdrawal use intensity)	m³/tonne of crude steel	2.73	2.81	2.73	2.65	2.73
Emirates Steel (Water consumption intensity)	m³/tonne of crude steel	2.13	2.18	2.17	2.08	2.09
Al Ain Cement Factory (ACF)	m³/tonne of cementitious material	0.08	0.11	0.1	0.11	0.13
Anabeeb	m³/tonne	1.39	1.95	1.84	1.28	1.76

* Third party water is the water from municipal water supplies or other public or private water utilities
** RO treated seawater for Emirates Steel
*** Covering 100% of all water consumption sources from the company

3.5. Commitment to Environmental Compliance

At EMSTEEL, we maintain the highest environmental standards, evidenced by our ISO 14001 certification across all sites and offices. We continuously improve our environmental performance and comply with all relevant laws and regulations. The Environment Agency - Abu Dhabi (EAD) evaluated us and granted an Environmental Permit.

We monitor and report our environmental performance monthly and take pride in our unblemished record, with no fines or sanctions for non-compliance and zero major spill incidents. Our goal is to maintain this record of zero incidents and complaints.

We are committed to reducing noise and vibration, conducting ambient noise monitoring every three months and occupational noise monitoring monthly. We use preventive maintenance, engineering controls, and noise damping solutions.

For spill prevention and clean-up, we dispose of oil-contaminated materials as hazardous waste through approved providers. All spills are documented and reported through our systems. Emirates Steel has established a Key Performance Indicator (KPI) to monitor oil consumption on a monthly basis across all production facilities. A baseline has been set, along with a reduction target to be achieved.



ZERO
Environmental claims or non-compliance issues and zero major spills



3.6. Products & Services Environmental Impacts



GRI Standards: 304 (2016) & 308 (2016)
CARES SCS: 3.4

We are dedicated to minimising the environmental impacts of our products and services throughout their entire lifecycle, from raw material extraction to disposal. EMSTEEL prioritises responsible sourcing to reduce habitat destruction and pollution during mining. In manufacturing, we invest in cleaner technologies to lower greenhouse gas emissions and effectively manage waste by recycling by-products.

We emphasise the durability and energy efficiency of our products during use and encourage recycling at the end of their lifecycle to conserve resources and reduce emissions. We actively manage Scope 3 emissions by collaborating with suppliers to enhance sustainability practices and optimising logistics to minimise transportation emissions. To promote recycling and the circular economy, we recover scrap steel and other materials, reintegrating them into manufacturing. We implement waste reduction initiatives, such as reusing by-products like slag in construction and partnering with organisations to promote recycled materials.

We conduct lifecycle assessments (LCAs) to evaluate the environmental impacts of our products, identifying areas for improvement that lead to innovations in design and manufacturing processes.



Our Products Environmental Product Declaration (EPD)

Emirates Steel EPD for Heavy Section and sheet Piles has a Global Warming Potential (GWP) of 0.706 tCO₂/tonne, significantly lower than the industry average, reflecting our commitment to reducing environmental impact. In 2025, EMSTEEL plans to issue six more EPDs, reinforcing its dedication to sustainability and leading the steel industry.

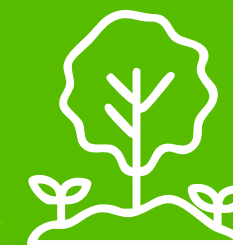
The EPD covers key environmental impacts, including greenhouse gas emissions (GWP), energy consumption (renewable & non-renewable), water footprint (freshwater use), acidification, eutrophication, resource depletion, and waste generation. It also details end-of-life recycling potential and recovery rates, ensuring a comprehensive sustainability assessment of the product.

Biodiversity

We advocate for sustainable land use practices and lead conservation efforts through comprehensive biodiversity management as part of our ESG policy and our Operation Environmental Management Plan (OEMP). We actively engage in local environmental initiatives, such as sponsoring the "Let's Collaborate Together" initiative by the Saeed Association to plant 1,000 mangrove trees, supporting the UAE's vision for a greener future. In 2024, we have 5,761 plants of various species in our facilities covering an area of 5,391 m² of green landscape.

To ensure environmentally responsible operations, we conduct EIA that evaluate marine and terrestrial biodiversity. These assessments show that our activities do not significantly impact the ecotoxicity of surrounding ecosystems. We implement mitigation measures and conduct regular monitoring to

protect local biodiversity, as outlined in our OEMP. We have introduced ESG & Sustainability questionnaires for our suppliers, emphasising biodiversity and are engaging tier 1 suppliers in aligning our environmental efforts, ensuring that our commitment to biodiversity extends throughout our supply chain. Looking ahead, we remain dedicated to implementing additional environmental projects aimed at further reducing our impact on biodiversity.



5,761
Plants in our
facilities

04

Commitment to our People & Communities

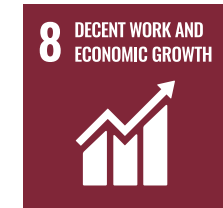
Material Topics

Health and Safety

Human Capital Development

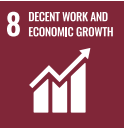
Emiratisation

UN Sustainable Development Goals



Health and safety is our top business priority. We value the development of our human capital and foster a spirit of togetherness among our people and partners, while maintaining our position as a preferred employer for Emirati nationals and talented individuals. Our commitment to social responsibility ensures we uphold these values, consistently prioritising our people wellbeing and professional growth

4.1. Occupational Health and Safety



GRI Standards: GRI 403 (2018)
CARES SCS: 4.2

At EMSTEEL, our employees are our most valuable assets, and their health and safety are our top business priority. We ensure their wellbeing through the implementation of the highest international safety standards, efficient management systems, and mandatory safety training programmes.

We take pride in our zero-harm culture, where people are valued above everything else. We implement preventative measures to target zero injuries and are committed to understanding, evaluating, and mitigating health and safety risks across our businesses to maintain a healthy workplace for all.

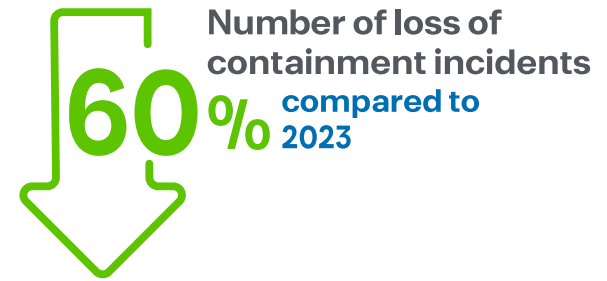
We comply with the Abu Dhabi Regulatory Framework and were the first company in Abu Dhabi Industrial City to receive certification from Abu Dhabi Occupational Safety and Health (ADOSH). We undergo annual inspections to maintain this certification.

We hold the ISO 45001 certification for Occupational Health and Safety (OH&S) management systems, supported by our Integrated Management System (IMS) to enhance workplace safety and health standards, 100% of our operation is certified for ISO 45001. Annual internal and external audits ensure compliance with international standards, regulatory requirements, and best practices, verifying the effective implementation and continuous improvement of our IMS, including ISO 45001.

Our responsibility extends to contractors and their subcontractors. To ensure their safety, we have established a comprehensive Contractor Management System, including the Contractor Safety Management Procedure, Contractor EHS Requirements, EHS Handbook, and Trucking Safety Requirements. These documents outline

mandatory safety requirements and rules for contractors working within our premises, reinforcing our commitment to a safe and secure work environment for all.

We demonstrate a robust transformation in our safety culture and performance excellence through various initiatives and have a high leadership commitment and active employee engagement, supported by our strategic Aman 2.0 Safety Culture Transformation Project.



We take a comprehensive approach to safety communication and awareness, ensuring that every employee is well-informed and empowered to work safely at all times. This includes, but is not limited to, the following initiatives:

Weekend Summaries:

Safety is a top priority, and our weekend summaries provide clear information about safety performance, incidents, and awareness materials. These summaries help communicate important safety information and updates to all employees

Safety Quizzes & Campaigns:

Monthly safety quizzes and campaigns are conducted to raise awareness about health and safety procedures. These interactive initiatives engage employees, boost participation, and help them retain crucial safety information

Visible Reminders:

Safety messages and visuals are prominently displayed on computers and TV screens across offices and plant areas, providing a constant reminder to stay safe throughout the workday

Mock Drills and Simulations:

Emergency mock drills are carried out regularly as part of our annual drill plan. These drills ensure that our emergency response team is well-versed in procedures, trained, and able to coordinate and communicate effectively during an emergency. We also conduct strategic drills in collaboration with Abu Dhabi Civil Defence to improve coordination and response in real emergency scenarios

Safety Championship Programme:

The quarterly Safety Championship Programme fosters healthy competition between sections, with a rolling trophy awarded to the top-performing section. If a winning section fails to retain its position in the next quarter, the trophy moves to the new leader. These programmes help create a culture of shared responsibility for safety across the team

Coaching Sessions:

Awareness coaching sessions are held across plants to educate employees on the difference between near misses, unsafe acts, and unsafe

conditions. These sessions ensure everyone is equipped to report hazards and near miss effectively.

Monthly Safety Meetings:

Each plant and department hold monthly safety meetings that involve shop floor employees in discussions, consultations, and communication of safety information

Lessons Learned:

Lessons learned are compiled and shared company-wide following serious incidents. This ensures that employees are aware of incidents across the organisation and understand the lessons that can be applied to improve safety practices in their own areas.

Worker Engagement and Training

A robust and collaborative safety culture is promoted actively by engaging our employees in our health and safety management system. This approach ensures effective hazard identification, control, and communication, resulting in a safer and more empowered workforce.

By involving our employees in work instruction review, risk assessments and hazard identification processes, we recognise their invaluable experience and intimate knowledge of the workplace to ensure safe practices.

We celebrate and appreciate our proactive team members during our monthly EHS meetings. Before each task, we communicate the associated risks to the work team, ensuring everyone involved is well-informed and equipped to work safely.

By using engaging materials such as posters, videos, screen savers, quizzes, competitions, and toolbox talk resources, we cater to diverse learning styles, ensuring safety remains a top priority. Integrating safety topics into our operating practices keeps our team members consistently focused on sustainability and well-being.

Safety Trainings and Awareness Campaigns:

Identifying Potential Serious Injury and Fatalities (PSIF) Training:

Robust training provided to leaders on identifying potential serious injury and fatalities

Radiation Safety and Security Awareness:

Trained employees on radiation risks and safety measures

Office/Workplace Safety Awareness:

Trained employees on common office hazards, including reporting requirements and importance of safety leadership walkabout

Basic Fire Awareness:

Equips employees to identify and respond to fire emergencies effectively

Root Cause Analysis (RCA) Training

Conducted to the investigation team leaders to carry out effective RCA

Significant improvements have been made in Safety & Operations meetings through visual management, performance tracking, and enhanced engagement. The Visible Felt Leadership programme influenced safety-focused mindsets and behaviours, training over 60 leaders and conducting more than 260 coaching sessions. Traffic Management saw enhancements by segregating mobile equipment and improving driver, flagman, and supervisor training, while ensuring equipment maintenance. A comprehensive risk containment programme was launched, leading to visible risk reductions. Core safety management processes were strengthened to better control risks, including Contractor Safety Management, Emergency Response, Permit to Work, Lockout/Tagout, Work Instructions, and Job Safety Analysis. Serious Injuries & Fatalities (SIF) risk exposure was assessed, and a pilot programme for SIF prevention was introduced. An HSE governance structure and key metrics were established at both the plant and business unit levels, enhancing overall safety governance and performance tracking.

List of Trainings-2024

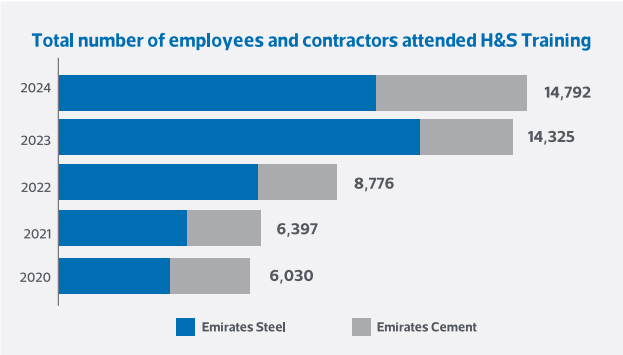
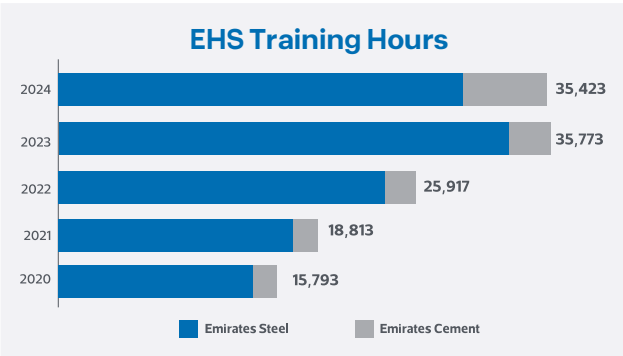
- HIRA/JSA Training
- Authorised Gas Tester Training
- Permit to Work (PTW) Training
- Safe Crane Operation Training
- Work at Height Training
- Rigging & Slings Training
- Safety In Heat Programme Training
- Safety Leadership with Impact Training
- Chemical Safety Training
- Process Hazard Assessment Training
- Pre-Startup Safety Review Training
- Enhanced Management of Change Training
- Confined Space Entry & SCBA Training
- Enhanced LOTO & ECOI Training
- Mobile Crane Operations -Lifting Supervisors Training
- Site Emergency Response Preparedness Training
- Overhead Crane -Lifting Supervisors Training
- Radiation Safety and Security Training
- Environment Pollution Prevention & Waste Management Training
- Environmental Permit Conditions Training
- Energy Management System (ISO 50001) Training
- Environmental Aspect & Impact Methodology Training
- Sustainability, ESG, and Decarbonisation Training
- Environmental Inspection and Hazard Observation Training

In addition to our regular environment, health, and safety (EHS) training programmes and campaigns, which promote best practices and raise EHS awareness among staff, we conduct mandatory induction trainings.

These induction sessions include directives on administrative issues, job requirements, our Quality Management Systems, Life Saving Rules, EHS Principles, and other relevant procedures.

In 2024, 14,792 of our employees and contractors attended EHS training comprising 3% increase compared to 2023. This increase signifies our continuous commitment on equipping our workforce with essential skills and knowledge

for safe and efficient operations in various work settings. This also reflects our commitment to fostering a culture of safety and continuous improvement



Safety Key Performance Indicators

In 2024, we maintained a robust safety culture by setting ambitious key performance indicators (KPIs) in critical areas. Our safety performance reflects a steadfast commitment to continuous improvement and employee well-being.

By achieving targets in key areas and proactively addressing areas needing enhancement, we reaffirm our dedication to fostering a safe and productive work environment. Notably, we achieved 100% of our designated KPIs, showing our commitment to promoting a healthy and safe workplace throughout the year.

We have also concluded the second phase of our Safety Excellence Transformation Project (Aman 2.0), which aimed at elevating our safety standards to global benchmark and fostering a culture of safety across all business units.

This Project demonstrates management's commitment and active involvement in ensuring a safe working environment, driven by our dedication to achieving zero harm and maintaining workplace safety at all times.


Hazard Identification and Risk Assessment

Our incident investigation and reporting procedure involves documenting all accidents, near misses, and injuries using root cause analysis. Preventative actions are identified and tracked in our online EHS platform (MySHEQ).

We address hazards such as ladders, mobile equipment, tools, fixed machinery, and sharp tools. For work-related injuries or illnesses, we follow Hazard Identification and Risk Assessment (HIRA) procedures and conduct Job Safety Analysis (JSA) for non-routine tasks.


HIRA:

Systematically identify and assess operational risks to implement appropriate controls for all routine activities



35, 423


Total H&S training hours in 2024



3%


Increase in total number of health and safety trainings delivered to employees this year compared to 2023

AMAN 2.0 Highlights



86 Emergency Drills

conducted to sharpen on-site preparedness



1.500+ Hours of specialised training

provided to our employees on risk identification and management

Job Safety Analysis

Proactively address hazards in non-routine jobs to mitigate risks, with the Job Safety Analysis (JSA) prepared for all non-routine and high-risk routine activities

In 2024, we significantly improved our EHS performance, highlighting our commitment

Table 4-1. Emirates Steel

Description	Unit	2022	2023	2024
Employees				
Lost Time Injuries (LTI)	Number	1	1	1
Lost-time injuries Frequency (LTIFR)	-	0.13	0.18	0.18
Total Recordable Injuries (TRI)	Number	7	6	2
Total Recordable Injuries Rate (TRIR)	-	0.89	1.10	0.36
The number of high-consequence work-related injuries (excluding fatalities)	Number	1	1	1
The number of hours worked	Million hours	7.9	5.5	5.6
Fatalities	Number	0	0	0
Contractors				
Lost Time Injuries (LTI)	Number	0	0	2
Lost-time injuries Frequency (LTIFR)	-	0	0	0.14
Total Recordable Injuries (TRI)	Number	0	1	5
Total Recordable Injuries Rate (TRIR)	-	0	0.07	0.36
The number of high-consequence work-related injuries (excluding fatalities)	Number	0	0	2
The number of hours worked	Million hours	11.6	14.1	14.0
Fatalities	Number	0	0	0

Table 4-2. Emirates Cement

Description	Unit	2022	2023	2024
Employees				
Lost Time Injuries (LTI)	Number	0	1	0
Lost-time injuries Frequency (LTIFR)	-	0	0.52	0
Total Recordable Injuries (TRI)	Number	1	3	1
Total Recordable Injuries Rate (TRIR)	-	0.4	1.6	0.4
The number of high-consequence work-related injuries (excluding fatalities)	Number	0	2	0
The number of hours worked	Million hours	2.2	1.9	2.5
Fatalities	Number	0	0	0
Contractors				
Lost Time Injuries (LTI)	Number	2	2	1
Lost-time injuries Frequency (LTIFR)	-	2.03	1.31	0.37
Total Recordable Injuries (TRI)	Number	3	3	1
Total Recordable Injuries Rate (TRIR)	-	3.05	1.97	0.37
The number of high-consequence work-related injuries (excluding fatalities)	Number	0	3	0
The number of hours worked	Million hours	1	1.5	2.7
Fatalities	Number	0	0	0

to workplace safety. Compared to 2023, we reduced crane incidents by 50%, and by 81% compared to 2020.

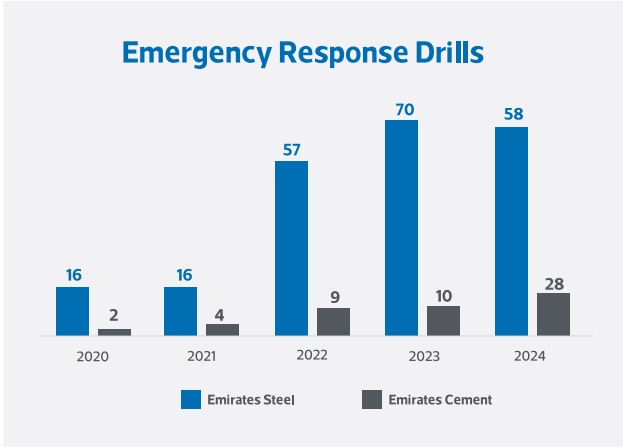
AI-Enhanced Safety Monitoring

This year, we introduced the AI EHS safety monitoring and hazard detection platform, deploying 40 AI-enabled cameras across three facilities. We plan to install an additional 40 cameras and go live in 2025.

Emergency Preparedness

We have established Emergency Response Procedures (ERPs) across our facilities, including specific plans for hazardous materials and high-rise emergencies. Emirates Steel is part of the 2025 Abu Dhabi Civil Defence Annual Preparedness Exercises Plan.

An Escape/Evacuation Plan for the main administrative buildings has also been implemented. Recognising the importance of emergency response drills, we conducted 9 drills in Anabeeb which is three times higher than the number of drills we conducted in 2023.



Healthcare Services & Wellbeing

We follow the strict guidelines of the Health Authority of Abu Dhabi (HAAD) to maintain the highest standards of care and compliance and have designed a specific approach to implement comprehensive occupational health surveillance across all departments.

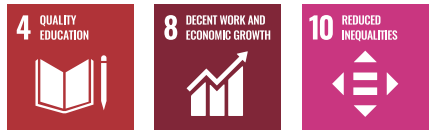
Our commitment to health and well-being encompasses a broad spectrum of services, including medical and health assessments, health surveillance, and well-being initiatives. Additionally, we offer counselling and guidance to our employees on various occupational health and pre-employment matters, fostering a supportive and healthy work environment.

We prioritise preventative, curative, and chronic disease management healthcare, alongside delivering top-tier emergency medical care, which includes initial management, stabilisation, and appropriate transfer to public or private hospitals.

An occupational doctor is appointed to conduct health risk assessments, identifying employees who require health checks, thereby ensuring a sustainable and healthy workforce. This year, we conducted several awareness sessions on critical health and safety issues.



4.2. Human Capital, Diversity & Inclusion



GRI Standards: GRI 401 (2016)
CARES SCS: 4.3 ,4.5, 5.1 & 5.2

Diversity and inclusion of our people are at the heart of our values. We nurture a supportive and inclusive workplace that champions well-being, personal growth, and equitable treatment.

In line with UAE Labour Law and International Labour Organisation (ILO) standards, we commit to ensuring fairness, equal opportunities, and ongoing development for all our employees. Our comprehensive Employee Handbook, accessible on our Intranet, summarises key Human Capital policies.

EMSTEEL Workforce 2024

We believe that a diverse workforce, encompassing various ages, categories, and genders, drives innovation and fosters a collaborative work environment.

Embracing diverse perspectives enriches our organisational culture and enhances our ability to meet global client needs. We are dedicated to creating an inclusive environment where every employee feels valued, respected, and empowered to contribute fully.

We have sustained 4% of women in our workforce similar to the previous two years, reflecting our focus on gender diversity and an inclusive work environment.

Table 4-3. Our Group Workforce

Description	2022	2023	2024
Female	153	168	163
Male	3,510	3,595	3,540
Under 30 years old	349	425	401
30 – 50 years old	2,591	2,666	2,493
Over 50 years old	723	672	809
Senior Management	28	30	24
Middle Management	158	168	186
Staff	3,477	3,565	3,493

The number of new hires has increased this year compared to 2023, reflecting our steady growth and expansion. In both 2023 and 2024, EMSTEEL participated in ‘The Industrialist Career Fair’ in Abu Dhabi. We highlighted numerous vacancies and introduced potential training programmes in collaboration with a number of academic institutions. This involvement addressed the talent gap in the industrial sector and provided valuable opportunities for Emiratis to excel in their chosen fields.

Table 4-4. New Hires

Description	2022	2023	2024
By Gender			
Female	45	20	21
Male	152	82	156
By Age			
Under 30 years old	120	66	25
30 – 50 years old	70	35	136
Over 50 years old	7	1	16
By Nationality			
Emirati	99	35	9
Non-Emirati	98	67	168

Table 4- 5. Employees Number by Category

Description	2022	2023	2024
Permanent Employees	2958	3005	2957
By Gender			
Female	138	153	149
Male	2,820	2,852	2,808
By Nationality			
Emirati	585	626	620
Non-Emirati	2,373	2,379	2,337
Temporary Employees	705	758	746
By Gender	99	35	9
Female	15	15	14
Male	690	743	732
By Nationality			
Emirati	0	0	1
Non-Emirati	705	758	745

Table 4-6 Turnover by rate

Description	Unit	2022	2023	2024
Total employee turnover	Number	218	203	240
Voluntary turnover rate	%	3.7	4.0	6.0
Involuntary turnover rate	%	2.5	1.4	2.9
Workforce turnover rate	%	6.2	5.5	8.9

The turnover rate in 2024 increased compared to the previous year, reaching 8.9%.

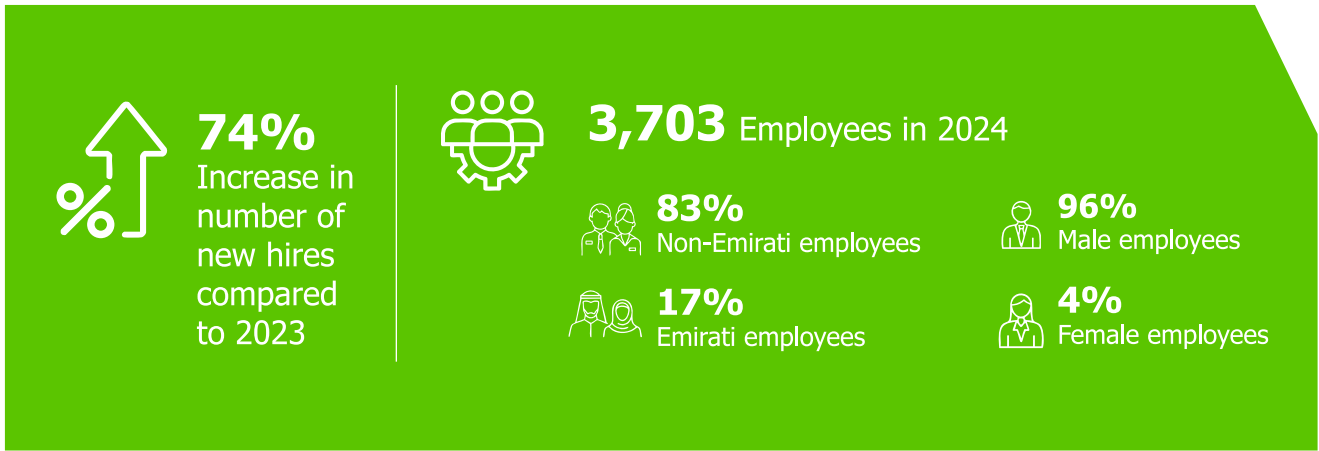
In 2024, the CEO total compensation to median Full-Time Equivalent (FTE) total compensation was 9%. We offer non-compensation benefits,

including pension and retirement plans to UAE Nationals and Gulf Cooperation Council employees, while expats receive End of Service benefits.

We have a restructuring policy in place, which includes a promotion policy and succession planning programme. Although there is no specific policy for employees to associate freely, We encourage participation in councils and affinity groups that are sponsored and supported by the UAE government, such as the Youth Council, which serves as a prime example of fostering engagement and collaboration.

Table 4-7. Turnover by Category

Description	Unit	2022	2023	2024
Gender				
Female	Number	14	15	23
Male	Number	204	188	217
Age Group				
Under 30 years old	Number	82	42	17
30-50 years old	Number	87	101	134
Over 50 years old	Number	49	60	89
Nationality				
Emirati	Number	100	57	45
Non-Emirati	Number	118	146	195



Employee Compensation and Benefits

We are dedicated to creating a workplace that attracts, retains, and motivates top talent. We uphold fair and competitive compensation practices to ensure our employees feel valued and appreciated.

Our Wage Policy and procedures strictly adhere to both National and CARES guidelines, ensuring that our employees receive wages and benefits that meet all regulatory requirements.

In 2024, there was a notable increase in the median income for both male and female employees at our company. The median income for men experienced an increase of 2%, whereas the median income for women saw an increase of around 5%.

These increments reflect our commitment to providing competitive and equitable compensation for all our employees, ensuring that our workforce feels valued and rewarded for their contributions.

We provide an extensive array of benefits that cover medical, financial, and logistical needs. Full-time employees receive benefits such as medical and life insurance, company-provided housing, transport facilities, education allowances, loans, and end-of-service benefits.

Our incentive scheme directly links individual and corporate performance with annual bonuses, motivating employees to strive for excellence. 100% of FTEs are covered through this programme. We are proud of our efforts to achieve a zero-pay gender gap, ensuring equal pay for equal work regardless of gender.

In 2024, all our female and male employees who took parental leave returned to work, showcasing our commitment to supporting our workforce.

Table 4-8. Compensation and Benefits

Description	Unit	2022	2023	2024
Description	Unit	2022	2023	2024
Average (median) income of men	AED	15,815	13,561	13,861
Average (median) income of women	AED	31,143	26,550	27,794
Ratio of median male compensation to median female compensation	Number	0.50	0.51	0.50

Table 4-9. Parental Leaves

Description	Unit	2022	2023	2024
Total number of employees that were entitled to parental leave				
Female	Number	77	80	64
Male	Number	2,066	2,563	1934
Total number of employees that took parental leave				
Female	Number	4	3	5
Male	Number	110	145	143
Number of employees that returned to work in the reporting period after parental leave ended				
Female	Number	4	3	5
Male	Number	110	145	143

Workforce Support and Engagement

EMSTEEL supports employees with career transitions, re-employment, and retraining. Workforce adjustments align with business needs, considering performance and behaviour considerations. Severance pay is provided when applicable.

To enhance engagement, EMSTEEL conducts annual employee surveys and two pulse surveys, helping to maintain a supportive work environment.

Diversity and Equal Opportunities



GRI Standards: GRI 401 (2016)
CARES SCS: 4.5

In our pursuit of sustainability, we foster a diverse and inclusive workplace culture that is integral to all facets of our operations.

In 2024, our workforce has grown to encompass 67 nationalities, reflecting an increase from 63 in 2023 and 53 in 2022. This expansion underscores our commitment and inclusivity to a rich tapestry of cultures, perspectives and experiences.

We are dedicated to promoting diversity and inclusion, ensuring that we not only attract but also retain a diverse talent pool. Our efforts create an environment where every

employee feels valued and included. Notably, the percentage of women in management positions has risen to 14%, up from 11% last year, highlighting our progress in achieving gender equity within our leadership ranks.



67 Nationalities in 2024

(6% increase from 2023)

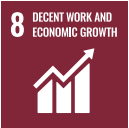


Celebrating Our Women

We celebrate the incredible mothers among our female staff on Mother's Day. We expressed our sincere appreciation for their dedication, hard work, and care. These remarkable women, balancing career and motherhood, inspired us with their resilience and strength. We thanked them for enriching our workplace and lives.

On International Women's Day, we joined the global celebration of women's achievements across various sectors. This reminded us of our ongoing journey towards gender equality.

4.3. Human Capital Development



GRI Standards: GRI 401 (2016)
CARES SCS: 4.3 ,4.5

Our management is dedicated to continuous learning and growth, with comprehensive plans for career progression and technical skills enhancement guided by our Learning and Development (L&D) policy.

This policy supports various training programmes to nurture employees’ abilities and advance their careers. We offer diverse learning opportunities, including online courses, lectures, and blended learning formats, promoting continuous personal improvement. This commitment aligns with our sustainability goals, fostering a culture of ongoing learning and innovation.

We manage employee training and learning activities using the SuccessFactors Learning Management System (LMS), integrated with the LinkedIn Learning Platform. Employees are granted access to LinkedIn Learning materials relevant to their job requirements and career paths. Regular training ensures employees are qualified to access plants and perform their jobs effectively.

Upskilling Our Workforce

We have launched several initiatives and support mechanisms to empower our employees, promote equal opportunity, and enhance their skills. Training needs are identified based on job relevance, performance appraisals, development plans, training guidelines, behavioural competency frameworks, and assessment results.

This approach ensures our training initiatives address specific skill gaps and support continuous professional growth, fostering a culture of continuous improvement and excellence throughout the organisation.

Our development programmes:

The Leaders Coaching Programme

Elevating the coaching capabilities of our leaders resulting in improved performance, team efficiency and collaboration

GROW Programme

Developing the behavioural and technical competencies of potential delegates through personal development plans with close monitoring

Masaar Programme

Future Leaders development programmes & Leadership development programmes

Career Aspiration Programme (CAP)

Aims to develop UAE Nationals through structured career development for both undergraduates and graduates, strengthening the workforce.

Time Spent on Learning

In 2024, we delivered training to 3,540 male employees and 163 females averaging 12 training days per employee. This not only surpasses the Worldsteel Association benchmark of 7.78 days but also represents a 20% increase compared to 2023.

The number of training hours increased by 45% from the previous year, totalling 242 thousand hours of training within EMSTEEL . Additionally, we welcomed 153 graduate trainees into our workforce, which is five times higher than the number of trainees in 2023.

Overall, EMSTEEL average training hours per staff member increased by 13% from the previous year. The average training hours per employee rose from 83 last year to 94

in 2024. This increase is reflected across all categories within our organisation, from senior management to staff. We also increased the training hours for our contractors, ensuring the transfer of knowledge.

Table 4-10. Time spent on learning – EMSTEEL

Description	Unit	2022	2023	2024
Gender				
Female	Hours	157,759	7,992	36,328
Male	Hours	3,655	233,590	313,017
Category				
Senior management	Hours	127	133	581
Middle management	Hours	2,377	2,306	4,904
Staff - employees	Hours	135,467	239,143	343,549
Average Training Hours per Employee	Hours/Number	61	83	94
Number of training hours per employee-contractor	Hours/Number	8	15	94
Gender				
Female	Hours/Number	42	55	223
Male	Hours/Number	61	84	88
Total (average) number of employees and permanent contractors (if any) employed at all sites during the data collection/reporting period	Number	2,668	2,909	3,703
Total number of graduate trainees employed in reporting year	Number	3	27	153
Total number of long-term unemployed people on training Programme, with a view to employment, in the reporting year	Number	71	109	99



349, 345
Hours of training
in 2024



4.5 times
Increase in training hours
to female employees
compared to 2023



45%
Increase in training
hours compared to
2023

We partner with top-tier training providers and business schools, along with both regional and international universities and educational institutes, to organise training and development activities for our workforce.

This includes prestigious institutions such as the International Institute for Management Development (IMD), London Business School, Harvard Business School, Abu Dhabi Vocational Education and Training Institute (ADVETI), Khalifa University, Steel University, and more. In 2024, we exceeded our targeted training of 80 hours annually per employee and recorded 94 hours.

We utilise the Kirkpatrick Evaluation Model up to three levels to assess training effectiveness, automated within the SAP SuccessFactors Learning Management System (SF LMS). The model is applied at the following levels:

Level 1: Reaction

Collects immediate feedback on participants' satisfaction with the training.

Level 2: Learning

Measures the knowledge, skills, and competencies gained from the training.

Level 3: Behaviour

Assesses the application of new knowledge and skills in the workplace.

Regular IMS Internal Audits assess our training performance, with external audits by certification bodies. Training achievements are monitored monthly and quarterly.

On-the-Job Training (OJT) aims to develop required competencies through supervised, real-life job training, involving systematic

planning, mentoring, and evaluation by the Operations and Support Services team.

Employees Engagement

At EMSTEEL, we recognise the crucial role our employees play in achieving sustainability. We believe that an engaged and motivated workforce is essential for long-term success, and we continuously innovate our employee engagement strategies.

The Happiness & Wellbeing Committee focuses on creating a positive work environment, addressing emotional health, work-life balance, financial and stress management, and health awareness. Through monthly programmes and initiatives, the Committee promotes open communication and active engagement, helping employees build resilience and manage stress.

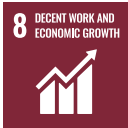
We use various communication channels, including corporate communication, online announcements, Steel Hub, Yammer, EMSTEEL Pulse, emails, and video teasers, to ensure seamless information sharing. Events like Group CEO townhalls, People division Townhall & Field visits and Meylskom engage employees and keep them informed about company developments.

The Happiness & Engagement Committee also offers motivational sessions for UAE nationals under the Career Aspiration Programme (CAP), aiming to boost motivation, enhance behavioural traits, and promote team unity. In 2024, employee engagement survey was conducted that revealed a number of focus areas for action in 2025. By prioritising employee well-being, we foster a thriving workforce, leading to increased engagement, motivation, and a sustainable future for all.

Coffee with GCPO and the Team

The People Division recently launched a weekly session called "Coffee with GCPO and the Team," offering employees an open platform to engage with the Group Chief People Officer and the People Division management. These meetings foster communication and allow employees to share their concerns and suggestions.

4.4. Emiratisation



GRI Standards: GRI 413 (2016)
CARES SCS: 5.2

Over the years, we introduced a series of comprehensive and strategic initiatives to support Emiratisation goals and advance the UAE's critical manufacturing sector. These efforts align with the national Operation 300bn strategy, aimed at reinforcing the UAE's global position as a leader in advanced industries.

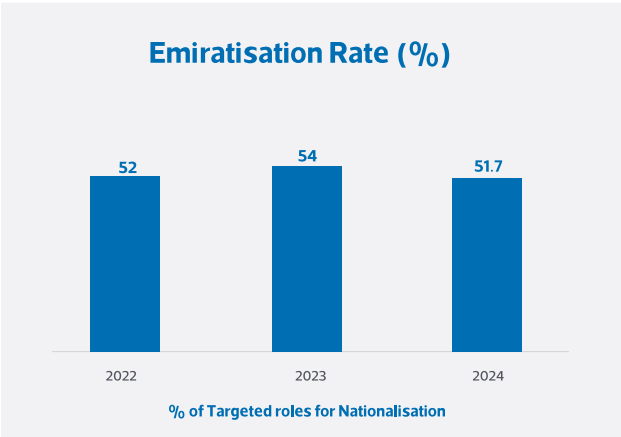
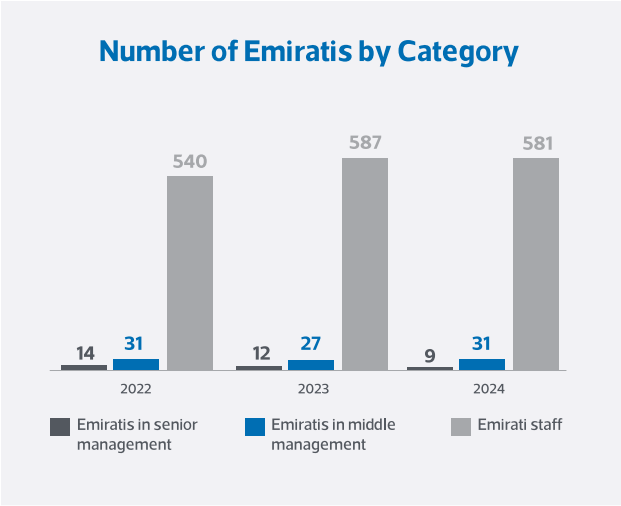
Our Emiratisation policy, including Talent Acquisition Procedures, enables us to reach our goal of ensuring that a substantial segment of our workforce consists of Emirati professionals.

We are committed to the Emiratisation initiative through various programmes and plans, including sponsorships, internships, and scholarships. A key initiative is CAP, which was launched in 2019, offers participants quality training over the course of three years, combining both theoretical and practical applications, within a real-life work environment.

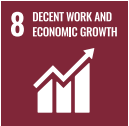
Since its launch, 167 Emiratis have joined the programme, where they received training to enhance their technical and leadership skills, where they can then partake in leading roles within the sector.

This year, we adopted a new approach for calculating the Emiratisation rate, focusing on positions that can be nationalised.

Our in-focus Emiratisation rate has reached 51.7% of targeted roles for nationalisation, reflecting our commitment to accelerating the effective participation of UAE nationals across different areas of our operations, in addition to providing them with sustainable and aspirational career opportunities. Based on our new calculation approach, we are targeting a 60% in-focus Emiratisation rate by 2030.



4.5. Community Empowerment



GRI Standards: GRI 413 (2016)
CARES SCS: 4.4

We understand that our success is linked to the well-being of the communities we serve. We prioritise minimising negative impacts on local communities through rigorous assessments and proactive measures. Our operations are primarily based in industrial zones such as Abu Dhabi Industrial City (ICAD), where we maintain close engagement with surrounding communities.

We address key concerns, including noise, dust, emissions, increased transportation and waste generation. By implementing these measures, we aim to mitigate adverse effects and ensure a harmonious relationship with the areas in which we operate.

We have a Corporate Social Responsibility (CSR) Policy that establishes the principles guiding our actions and behaviours concerning our social responsibility, employee, and labour rights. It stipulates our commitment to respect and adhere to all jurisdiction laws and regulations applicable to it and its operations and to align with the principles and provisions of international best practice and relevant and applicable international frameworks.

We also have established a comprehensive CSR programme focusing on four key pillars: Education, Health, Environment, and Society. Over the years, we have consistently implemented local community engagement, impact assessments, and development programmes, highlighting our commitment to sustainability. We are committed to safeguarding the legal and customary rights, cultures, and values of local communities, as well as their natural resources and livelihoods. Our aim is to enhance the social and economic well-being of communities impacted by our operations.

In collaboration with local charity organisations, we assess and address the humanitarian, educational, and environmental needs of our community. We provide tools and resources to enhance performance and ensure eco-friendly practices. Our partnerships emphasise environmental consciousness, empowering organisations to become effective professionals and environmental stewards, contributing to a sustainable future.

We have a formal grievance process accessible via our website, promoting transparency, honesty, and accountability. This procedure allows employees and stakeholders to report unethical or unlawful conduct without fear of retaliation. By aligning our community engagement efforts with established standards, we ensure ethical, responsible, and effective participation. Our local community initiatives involve stakeholders in the UAE, including residents, customers, partners, and local authorities. Through the CSR and Community Engagement Strategic Framework, we diligently track and monitor activities, beneficiaries, and community satisfaction.

Tree Planting Campaign:
"Let's Collaborate Together"

As part of our commitment to environmental sustainability, EMSTEEL participated in the "Let's Collaborate Together" Tree Planting Campaign to offset our carbon footprint while actively engaging the local community. The large-scale event brought together 200+ participants, including EMSTEEL employees, residents, and representatives from various entities, fostering a shared responsibility for greener spaces. The initiative is expected to offset approximately 10 tons of CO₂ annually, contributing to long-term environmental benefits. Beyond its ecological impact, the campaign strengthened community relations and enhanced environmental awareness, reinforcing our dedication to sustainability and collective action.

We Give You Smile

For the 8th consecutive year, EMSTEEL is proud to launch its annual CSR campaign, 'We Give You Smile,' reaffirming our unwavering commitment to community support and volunteerism. This Ramadan, senior management and employees came together, packing over 500 food supply parcels for families in need. To maximise our impact and reach as many families as possible, we partnered with Emirates Red Crescent and The Emirates Society for Parents, Care & Relief Association, who helped with the distribution. Originally launched in 2016, this initiative continues to stand as a powerful testament to EMSTEEL's dedication to uplifting local communities and fostering a culture of giving.

Ramadan Iftar Meals Distribution

As part of our social responsibility programme, EMSTEEL participated in an Iftar meal distribution at a labour camp in Mussafah, Abu Dhabi Industrial City (ICAD). This initiative, carried out during Ramadan, reinforces our commitment to community support and aligns with our ongoing efforts to make a positive impact on society.

Blood Donation

Since 2017, EMSTEEL has proudly organised its annual blood donation campaign, 'Drop of Giving,' in collaboration with SEHA across several locations. We have continued this impactful initiative, reinforcing our commitment to community health and well-being. Through this blood drive, employees actively contribute by donating blood, helping replenish local blood banks and support medical facilities. Beyond saving lives, this initiative fosters a strong sense of unity and social responsibility within our community.



17%
Increase in community initiative expenditure when compared to 2023



1,448
Volunteer hours spent in 2024 by our employees

Description	Unit	2022	2023	2024
Total community initiative expenditure	AED	741 k	517 k	606 k
Community initiative rate	AED/Tonne of crude steel	0.23	0.159	0.19
Amount invested in the community as a per-centage of company revenue	%	0.003	0.006	0.007
Total number of employee volunteers	Number	220	337	181
Total number of employee volunteering hours	Number	1,760	2,022	1,448

05

A Trusted & Responsible Partner

Material Topics

Corporate Governance
Business Integrity & Ethics
Responsible Supply Chain
Customer Engagement

UN Sustainable Development Goals



EMSTEEL upholds the highest standards of corporate governance, committed to transparency, accountability, and ethical business practices. We strive to create enduring value for stakeholders. Our senior management regularly engages with customers for feedback. We promote sustainability within our supply chain through open communication and collaboration with suppliers.

5.1 Corporate Governance & Risk Management



GRI Standards: 2-9(2021), 2-13 (2021) & 2-23 (2021)
CARES SCS: 2.9, 4.1 & 5.4

In 2024, we have rebranded as EMSTEEL (ADX: EMSTEEL) as part of a broader strategy to accelerate our operational transformation and extend our global presence. The new brand identity embodies the successful merger of Emirates Steel and Arkan Building Materials, completed in the fourth quarter of 2021. Under the EMSTEEL brand, the company operates through two distinct divisions: Emirates Steel and Emirates Cement. The structure of the EMSTEEL group is designed to enable the seamless addition of new divisions, supporting growth into new markets and product lines.

Corporate Governance

The governance framework at EMSTEEL is designed to empower management to direct and control our operations efficiently, ensuring sustainable value creation. This approach is driven by principles of transparency, accountability, fairness, and responsibility—values that guide our actions. We firmly believe that robust corporate governance and ethical leadership are critical to maintaining our competitive edge and realising our full potential. This commitment is driven by disciplined oversight from the Board of Directors, a leadership team of uncompromising integrity, and a focus on meaningful engagement with shareholders and stakeholders alike.

Corporate Governance Overview

The key elements of our well- established and robust corporate governance are:

Board of Directors: The Board of Directors (BoD), entrusted by the shareholders, oversees the affairs of EMSTEEL Group.

Board Committees: The Board of Directors has established the Audit and Risk Committee, Nomination and Rewards Committee, Strategic Investment Committee, and Environment, Social, and Governance Committee. These committees, comprising of independent board members, operate under clearly defined charters and meet regularly to fulfil their mandates.

Management Committees: Charters and relevant policies and procedures are in place for the effective operation of committees such as the Executive Committee, Insider Trading Supervision Committee, Risk and Crisis Management Committee, Information Technology Steering Committee and ESG Steering Committee.

Our **Executive Committee (EXCO)** is responsible for ensuring that the corporate objectives set by our BoD are met and that our operational activities are conducted according to the established policies and procedures. They also closely monitor compliance with these policies. An ESG and Sustainability Function was established in 2024, leading the development of Group wide sustainability strategies to ensure that the organisation operates in an environmentally and socially responsible manner.



Board of Directors

Our BoD comprises seven board members. Our independent BoD is committed to ensuring that EMSTEEL adheres to the laws and regulatory requirements. As part of our commitment to robust governance, we prohibit the Group CEO from serving as the Board Chair and directors are typically required to stand for re-election at the Annual General Meeting (AGM) every three years.

This year, we provided two training sessions covering ESG, Sustainability, and Decarbonisation topics to our BoD.



Hamad Al Hammadi
Chairman



Ahmed Ali Al Shamsi
Vice Chairman



Eng. Saeed Al Remeithi
Group Chief Executive Officer



Abdulaziz Al Hajri
Member



Fatima Al Fahim
Member



Nabeel Qadir
Member




Farah Al Mazrui
Member



7

Board Members



86%

Independent Board Members

Board Committees

EMSTEEL has four board committees, each has its unique responsibilities yet complementing each other to ensure our operations sustainable and ethical growth.

Nomination & Rewards Committee:

The committee handles nominations for board and executive management, sets and reviews remuneration and benefits policies, and conducts annual performance evaluations.

Strategic Investment Committee:

Evaluates and approves key items such as corporate strategy and business plans before they go to the Board of Directors for final approval.

Audit & Risk Committee:

Reviews financial statements, oversees internal controls, governance, and the Risk Management Framework.

ESG Committee:

Supports the Board of Directors in overseeing the Group's ESG programmes, policies, and practices.

As part of our commitment to transparency we have publicly disclosed our Corporate Governance Report with a detailed description of our Corporate Governance structure and responsibilities.

We have established a comprehensive set of policies and procedures to ensure that all our activities and operations are conducted in full compliance with applicable laws, regulations, and industry best practices. To maintain their effectiveness and relevance, we review and update these policies every two years.

Policies

The key policies and procedures include:

ESG Policy:

Establishes a framework to guide our activities and operations towards sustainable development. It outlines our commitments with respect to ESG and provides a roadmap for achieving our goals.

Corporate Social Responsibility Policy:

Ensures that we refrain from engaging in activities that directly or indirectly violate employee and labour rights. It establishes the principles guiding our actions and behaviours concerning our social responsibility, employee and labour rights.

Risk Management

We have an effective Risk Management Framework in place that deals with understanding, documenting, and managing the Group's risk environment and taking measures, where necessary, to ensure those risks are contained to acceptable levels consistent with the Group's risk appetite. The Risk Policy is applicable for all business lines, departments, and sections. It is also applicable for strategic and corporate governance activities that are undertaken by the Executive Committee (EXCO) and senior management. The Board of Directors (BoD) has an oversight responsibility pertaining to the Group's Risk Management Framework. The BoD has approved the Risk Policy and provides the necessary support to ensure that risk management is incorporated into the culture of EMSTEEL. The Risk Management (RM) section has been established to facilitate the implementation of the Risk Management Framework and Risk Policy. The Audit and Risk Committee provides oversight to the RM section. The Risk function has a direct reporting line to the Audit and Risk Committee and reports operationally to the Group General Counsel.

ESG Risk and Approach

EMSTEEL is also dedicated to identifying, assessing and mitigating ESG Risks that may impact our operations, stakeholders and long-term success. Our ESG Risk Management approach is integrated into our overall risk management policy and framework. As part of our ESG risk management approach, we have a dedicated Climate Risk register, identifying and monitoring physical and transition climate risks impacting our operations, employee safety, and energy security. Our mitigation strategies focus on pre-emptive infrastructure upgrades, process optimisation, and operational controls.

Government Contracts

In 2024, we report zero revenues from government contracts, reflecting our independent market operations and commitment to transparency in our financial engagements.

Political Contributions & Lobbying

We maintain a strong commitment to ethical business practices and transparency. In alignment with our corporate governance principles and UAE laws, which prohibit political contributions, we report zero political donations or lobbying expenditures.

Executive Compensation

Executive compensation is connected to the company's corporate balanced scorecard, and includes key performance indicators (KPIs) related to Environmental, Social, and Governance (ESG) factors, including Environment, Health, and Safety (EHS). This ensures that leadership is accountable for sustainability performance and workplace safety.

Long-term business success is related to the ability to serve the market, retain customers, and withstand unexpected events. Consequently, EMSTEEL, apart from serving its customers in the best possible manner, continues to develop its ability to effectively manage and respond to unexpected disruptions, disasters, and serious events that could affect its people, communities, and business continuity.

We have a Business Continuity Management Framework that includes a set of Policies and Procedures that covers the Business continuity and recovery requirements for all operational and support functions. This framework provides directions for successful and timely response to any incidents/serious events that could affect business continuity and provides guidelines for responding to crises declared by the Crisis Management Team (CMT).

The Business Continuity Framework ensures that all critical activities necessary to resume operations are conducted according to identified processes and requirements, such as the Recovery Strategies, the Recovery Time Objective (RTO), the Recovery Point Objective (RPO), and the Response Plans. Periodically, this framework is reviewed to administer, implement, and improve the Business Continuity Plans (BCPs) along with continuous monitoring for new areas for development as and when the need arises. The scope of the Business Continuity Framework covers the loss of a building, the unavailability of staff, the denial of access, the loss of technology, power and/or automation, the loss of a vendor, and the loss of critical equipment.



We are certified with **ISO 22301** for Business Continuity

5.2. Business Integrity & Ethics



GRI Standards: 2-23 (2021), 2-27 (2021)
CARES SCS: 2.9, 4.1 & 5.4

At EMSTEEL, our deep commitment to ethical principles and integrity forms the foundation of our business. We prioritise building trust-centred relationships with our suppliers and customers, ensuring that every interaction is rooted in honesty and respect.

The highest governing body responsible for ethics and anti-corruption oversight is the Board of Directors (BoD), supported by the Audit Committee and the Executive Committee (EXCO).

Compliance

The Compliance function is responsible for monitoring the compliance of the Group and its employees with the applicable laws, regulations, statutory requirements, resolutions, policies and procedures, and rules of business through effective coordination with all internal and external stakeholders.

The Compliance function has a direct reporting line to the Audit and Risk Committee and reports operationally to the Group Chief Executive Officer.

We have a number of policies and procedures in place to ensure that all our activities and operations are performed in full compliance with the relevant laws, regulations and industry best practices. These policies and procedures are:

Compliance Policy:

Outlines the Group’s compliance framework and defines the procedures, roles and responsibilities of the compliance function.

Whistleblowing Policy:

Provides guidance to encourage our employees and other stakeholders (e.g., suppliers, customers, community) to report unethical activities within the Group and to reiterate the Group’s zero tolerance towards wrong doing.

Anti-Bribery and Corruption Policy:

Sets out guidance for identifying and dealing with bribery and corruption issues.

Conflict of Interest and Related Party Policy:

Provides guidance on how to effectively manage all conflicts of interest and how to make required disclosures.

Fraud Control Policy:

Promotes the Group’s zero-tolerance to fraud by providing guidelines and assigning responsibility for the development of controls and conducting investigations.

We review our policies every two years.

Unethical Incidents and Complaints

We adhere to a comprehensive suite of policies that govern all aspects of our operations. Additionally, we assess 100% of our operations for corruption-related risks and provide channels for whistleblowers to report Code of Conduct violations through our website. Our Code of Conduct (COC) applies to all employees at all levels. It reflects our values in all relationships and responsibilities towards employees. As part of our commitment to transparency, our COC is publicly disclosed on our Website.

Ethics & Compliance Function Establishment

This year and in order to further support our governance structure, the Ethics & Compliance Function was established. The function governs activities related to whistleblowing, code of conduct, anti-bribery and corruption, conflict of interest and related party transactions, and fraud control.

Our sustainability strategy prioritises eliminating unethical incidents, such as harassment and discrimination in the workplace. This year we had one ethical incident recorded and reported to an external regulator. On the other hand, we had zero ethical incidents and complaints resulting in enforcement or prohibition notices by an external regulator, and zero incidents leading to successful prosecution by an external regulator. In 2024, no corruption incidents were reported. We work diligently to educate our employees on the significance of organisational fraud and risk management through multiple training sessions held throughout the year. Furthermore, this year 74% of our workforce has formally certified their compliance with anti-corruption policy. We are planning to launch ethics survey in 2025 for all our employees.

Social Responsibility

EMSTEEL has a Corporate Social Responsibility Policy that establishes the principles guiding our actions and behaviours concerning our social responsibility, employee, and labour rights. It stipulates its commitment to respect and adhere to all jurisdiction laws and regulations applicable to it and its operations and to align with the principles and provisions of international best practice and relevant and applicable international frameworks.

EMSTEEL respects human rights in line with the guidelines provided in UAE laws and regulations. We have ensured a culture of tolerance at workplace by fostering ideas of tolerance and co-existence, protecting the rights of workers and women’s rights. Moreover, our minimum

hiring age at EMSTEEL is 18 years old, in adherence to our commitment to prevent child and/or forced labour, and the implementation of our disciplinary process extends across all EMSTEEL operations and facilities. This year, we are proud of our remarkable compliance achievements. These accomplishments reflect our dedicated efforts and the strength of our robust compliance systems.

EMSTEEL upholds workers’ rights to freedom of association and collective bargaining within the limits of UAE law. While trade unions are not legally recognised, EMSTEEL facilitates employee representation through structured engagement mechanisms, including surveys, focus groups, and grievance channels. The company ensures fair negotiations, transparent employment contracts, and compliance with labor laws.

This achievement aligns with our overall performance with respect to ethical behaviour. Over the past years, we have maintained zero records of ethical incidents and human rights grievances, with the exception of 2023, when three grievances were filed. Also, this year, we have one unethical incident reported. We will continue taking the necessary actions to address these cases and uphold discipline among employees.

ZERO

- Incidents of Corruption
- Incidents of discrimination
- Incidents of abusive behaviour
- Incidents of harassment
- Legal actions related to anti-competitive behavior, anti-trust, & monopoly
- Grievances about Human Rights

Minority Investor’s Protection

To empower shareholders, especially minority shareholders of joint-stock companies listed on exchanges in the United Arab Emirates, the Securities and Commodities Authority (SCA) has established robust rules and regulations that EMSTEEL abides to. These principles are designed to foster active participation in general meetings and corporate dealings with related parties.

5.3 Market Presence & Economic Performance



GRI Standards: 201 & 202 (2016)
CARES SCS: 5.5 & 5.6

EMSTEEL is committed to enhancing our market presence and ensuring the resilience of our business model. Through strategic investments, innovative product development, and a dedication to excellence, we continuously adapt to market dynamics and emerging opportunities.


We supply products within the UAE and have been exporting to more than 70 markets across the Americas, Europe, Asia, the Middle East, and Africa.

Emirates Steel continues to retain a significant share in the UAE market with 55-60% share of the UAE rebar market. In 2024 we have significantly increased our share in the UAE wire rod market: from below 50% in 2023 to over 60% despite aggressive import offers. Also, we have increased our share of heavy sections and sheet piles on the UAE market to around 60-70% of the addressable market, because of strong focus on Projects segment.


Revenue from the Group’s Emirates Steel division totalled AED 7.6 billion during 2024, generating an EBITDA of AED 680 million. Emirates Steel’s performance was impacted by adverse global market conditions.

Revenue from the Group’s Emirates Cement division was AED 0.8 billion in 2024, with an EBITDA of AED 212 million. Within the Cement division the Pipes & Other segment is reported as Assets held for Sale as a divestment process is ongoing. Revenue for this segment amounted to AED 156 million in 2024.


While revenues were below last year’s figures, this was primarily due to lower steel prices, despite stable volumes. In the cement sector, although both volumes and prices faced pressure, we maintained our market presence. These trends were influenced by overall market developments, particularly the overcapacity in the global steel market. However, our ability to sustain solid volumes in steel and navigate challenging market conditions in cement demonstrates our resilience and adaptability.




70+
Markets



897 M AED
EBITDA



8.3 Bn AED
Revenue



392 M AED
Net Profit

Table 5-1. Emirates Steel Economic Performance (AED million)

Description	2020	2021	2022	2023	2024
Direct economic value generated	5,055	7,858	8,589	8044	7,585
Total economic value distributed	5,000	7,415	7,653	7088	6,988
Operating costs	4,203	6,713	6,894	6259	6,039
Employee wages and benefits	682	663	706	756	858
Interest payments made to providers of loans	96	18.28	33.61	52	70.04
Payments to the government by country (UAE)	-	-	-	-	-
Community investments	1.2	0.5	0.7	0.5	0.6
Economic value retained	55	-	936	956	597

Table 5-2. Emirates Cement Economic Performance (AED million)

Description	2020	2021	2022	2023	2024
Direct economic value generated	865	824	806	922	792
Total economic value distributed	687	637	559	617	601
Operating costs	690	683	629	661	527
Employee wages and benefits	120	92	84	94	70
Interest payments made to providers of loans	42	33	27	30	4
Economic value retained	-	4	65	101	190

5.4 Supply Chain Management



GRI Standards: 204, 308 & 414 (2016)
CARES SCS: 2.10 & 5.1

At EMSTEEL, we strive to conduct business in a manner that safeguards and improves the lives of workers throughout our supply chain, while also preserving the environment.

In 2024, we published our Supply Chain Management Policy. The purpose of this policy is to outline the main activities performed by Supply Chain Management Department, ensuring transparency and adequate levels of service to the end users.

All our suppliers must have at least one of the following certifications:

ISO 9001:Quality Management Systems

ISO 14001:Environmental Management Systems

ISO 45001:Occupational Health and Safety Management Systems

ISO 50001:Energy Management Systems

Supplier Code of Conduct

EMSTEEL has a published Code of Conduct for its suppliers, which strictly includes provisions to combat corruption and bribery. All suppliers are required to adhere to all applicable anti-corruption laws and regulations, ensuring transparency and integrity in all business dealings.

This commitment to ethical practices is fundamental to maintaining trust and fostering long-term partnerships. The Supplier Code of Conduct also provides guidance on how

to report concerns. Additionally, we audit our suppliers to verify their compliance with the Code and relevant guidelines.

Sustainable Sourcing

We acknowledge the vital role our suppliers play in helping us meet our environmental, social, and governance (ESG) objectives. EMSTEEL is proud to be **Responsible Sourcing Certified** under the BES 6001 Framework Standard for Responsible Sourcing.

We also indicated our Responsible Sourcing commitments and requirements in our newly published Supply Chain Management Policy (e.g. ethics, workers protection standards, legal compliance, climate change and local communities).

We audited 464 of our critical suppliers this year to ensure their full compliance with all the national requirements and EMSTEEL expectations. We have a robust Responsible Sourcing Programme in place. It represents a comprehensive approach aimed at fostering sustainable practices throughout its supply chain.

By ensuring that suppliers not only comply with regulations but also contribute positively to environmental and social goals, EMSTEEL is committed to enhancing sustainability and ESG practices. This initiative ultimately benefits the company, its suppliers, and the broader community, creating a more resilient and responsible supply chain. The Programme sets targets that are fully aligned with our ESG Strategy. It also defines actions to achieve our

targets. The actions and strategies that we implement as part of our Sustainable Sourcing Programme include:

Supplier Assessment Framework:

We implement an ESG and sustainability assessment for all of our suppliers. Priority is given to our raw materials suppliers followed by our services suppliers. The ESG questionnaire focuses on supplier compliance with governance, environmental, and social responsibility, covering policies, legal adherence, certifications, risk management, and ethical sourcing. It also evaluates climate impact, energy efficiency, water and waste management, labour rights, employee well-being, and biodiversity protection to ensure sustainability across the supply chain.

The ESG and sustainability assessment score is integrated into the supplier selection criteria, ensuring that only compliant and responsible suppliers are chosen.

Engagement and Training:

We have established a comprehensive training programme for our suppliers on ESG practices, focusing on sustainability questionnaires, GHG emissions reporting, and responsible sourcing.

In 2024, we provided training and awareness sessions on ESG requirements with our suppliers. We also encourage our suppliers to participate in CDP reporting to improve transparency and accountability.

Compliance and Monitoring:

The Programme includes continuous monitoring and assessment of suppliers to ensure compliance with responsible sourcing requirements.

Collaboration and Improvement:

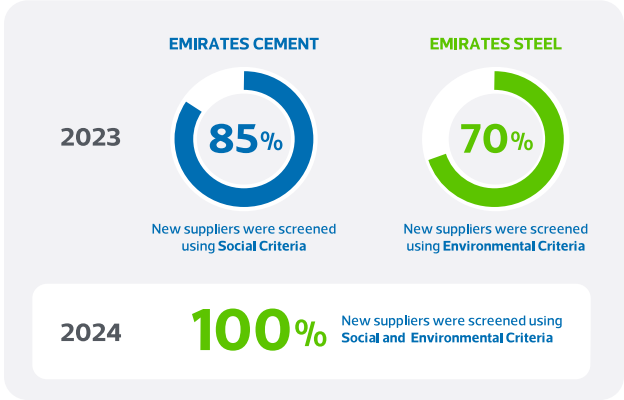
EMSTEEL collaborates with suppliers to enhance their sustainability practices, providing tailored recommendations for emission reduction.

ESG Auditing:

We have plans in place to conduct ESG audits for our key suppliers going forward.

A total of 13,633,640 tonnes of raw materials purchased, and 11,309,738 tonnes (approximately 83 %) were supplied by

evaluated suppliers for sustainability impacts at EMSTEEL. We aim to enhance the percentage of raw material supplied by evaluated suppliers for sustainability impacts next year. On the other hand, 100% of our new suppliers were screened using environmental and social criteria. This significant improvement from last year shows our dedication to incorporating sustainability practices into our extended supply chain. These efforts were celebrated with the prestigious **"Procurement Sustainability Champion Award"** at the 3rd Annual 100 CPO Summit. This recognition reflects our ongoing commitment to sustainable procurement through ESG integration in supplier registration, supplier scoring transparency, ESG training workshops, and aligning financial health and decarbonisation efforts.



In 2024, we adopted DitchCarbon, a digital platform to support reducing our Scope 3 upstream emissions. This platform assists our suppliers in measuring, managing, and reducing their carbon emissions, while also offering tailored strategies for emissions reduction through operational changes and the adoption of renewable energy.

Localising our Supply Chain

EMSTEEL is committed to contributing to the local economy by maximising efforts to identify local suppliers (companies based in the UAE with a valid Trade License) through the Supply Chain Hub platform. We require suppliers to provide an In Country Value (ICV) Certificate in support of UAE initiatives. This year, 86 % of our suppliers in Emirates Steel were ICV certified. Furthermore, we saw 5 % improvement in ICV rating of suppliers. For Emirates cement 34% of our suppliers were ICV certified. Furthermore, we saw 2 % improvement in ICV rating of suppliers.

In 2024, as in the previous year, the percentage of suppliers identified as having significant actual and potential negative social and environmental impacts was **zero**. Additionally, we maintained a remarkable **100%** compliance rate among suppliers who have formally certified their adherence to the code of conduct. This year, the procurement team delivered ICV training to our suppliers, explaining the ICV process and certification. This training enhanced suppliers ICV scores and local manufacturing contributions.

In 2024, 48.2% of our total procurement spending went to local suppliers. This percentage is higher than the percentage recorded last year (38.6%). This notable increase is a result of our relentless efforts to engage with our local suppliers and provide them with opportunities to work with us and positively contribute to our local economy. Our localisation efforts were also nationally recognised as we received the prestigious **ICV Excellence Award** at the "Make it in Emirates "Forum this year.

Localised Supply Chain Partnership

Our collaboration with TotalEnergies in 2024 has been pivotal in enhancing both sustainability and local value creation. After numerous successful trials, TotalEnergies began supplying EMSTEEL with a locally blended specialty mold releasing oil, from its solarised lubricant blending facility in the UAE.

This innovative solution not only improved operational efficiency but also significantly

contributed to ICV. By localising the supply chain, we can achieve a significant reduction in or scope 3 upstream emissions, primarily due to decreased shipping and transportation needs.

With a shared commitment to climate ambitions, the partners have worked closely to reach these objectives. This partnership underscores our dedication to sustainable practices and local economic development.

Table 5-3 Procurement

Description	2022	2023	2024
Total procurement spending (AED million)	7,754	6,077	6,847
Procurement spending on local suppliers (AED million)	2,986	2,346	3,302
Percentage of spend on local suppliers (%)	38.5	38.6	48.2
Total number of local suppliers engaged	1,247	2,275	1,365

Table 5-4 Emirates Steel Procurement

Description	2023	2024
New suppliers screened using social criteria (%)	100	100
Suppliers assessed for social impacts (Number)	1,446	682
Suppliers identified as having significant actual and potential negative social impacts (Number)	0	0
New suppliers screened using environmental criteria (%)	70	100
Suppliers assessed for environmental impacts (Number)	1,018	682
Suppliers identified as having significant actual and potential negative environmental impacts (Number)	0	0
Suppliers who formally certified their compliance with the code of conduct (%)	100	100
Total mass of raw materials purchase (Million tonne)	5.1	5.0
Total mass of raw materials from suppliers evaluated for sustainability impacts (Million tonne)	5.0	3.9

Table 5-5. Emirates Cement Procurement

Description	2023	2024
New suppliers screened using social criteria (%)	85	100
Suppliers assessed for social impacts (Number)*	790	464
Suppliers identified as having significant actual and potential negative social impacts (Number)	0	0
New suppliers screened using environmental criteria (%)	85	100
Suppliers assessed for environmental impacts (Number)*	790	464
Suppliers identified as having significant actual and potential negative environmental impacts (Number)	0	0
Suppliers who formally certified their compliance with the code of conduct (%)	100	100

*The assessment of social and environmental impact is conducted when onboarding new suppliers.

Creating Green Iron Supply Chain

EMSTEEL has partnered with ITOCHU Corporation and JFE Steel Corporation, to consider the construction of an iron making production facility in Abu Dhabi that would become an integral part of a global low carbon emission iron supply chain.

EMSTEEL and the two Japanese companies are working together to carry out feasibility studies on the creation of an iron making hub at a project site in Abu Dhabi to meet the growing demand for green steel.

EMSTEEL also signed a Memorandum of Understanding (MoU) with the Abu Dhabi

Department of Economic Development (ADDED) and ITOCHU Corporation to pursue studies focused on the establishment of the integrated steel production complex in Abu Dhabi.

In partnership with ITOCHU Corporation and facilitated by ADDED, EMSTEEL aims to establish an iron making production complex in Abu Dhabi that will play a significant role in the global supply chain for low-carbon iron, drive sustainable growth in the country's low-carbon iron supply chain and contribute towards achieving the UAE Net Zero 2050 strategic initiative.



5.5 Stable Production & Operational Efficiency



GRI Standards:201(2016) & 3-3 (2021)
CARES SCS: 4.3, 5.1, 5.3 & 5.4

At EMSTEEL, stable production is the foundation of our commitment to sustainability and operational excellence. By integrating cutting-edge technologies and adhering to best practices in resource management, we ensure a consistent and efficient production process.

We conduct regular inspections to ensure seamless operations and strict adherence to standard operating procedures (SOPs).

Our product traceability system, which tracks all components from quarries to finished products at customers' sites, is a cornerstone of our quality system.

We provide our high-quality products through our different production units:

EMSTEEL



Emirates Cement

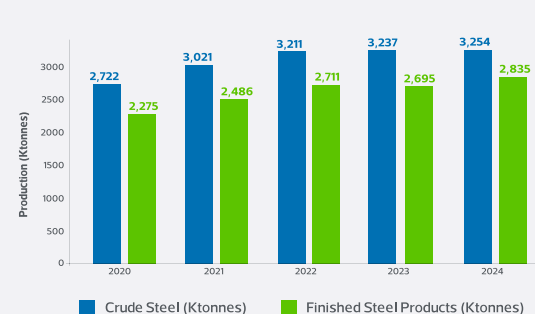
Al Ain Cement Factory (ACF)
Emirates Blocks Factory (EBF)
Anabeeb

Emirates Steel

Over the years we maintained steady production reflecting our efficiency and commitment to meeting market demands. In 2024, Emirates Steel has demonstrated stable production performance, with increased production in the Heavy Section Unit when compared to the previous years.

We also implemented process optimisation measures in our Steel Making Plants (SMPs) that lead into higher productivity in 2024.

Emirates Steel Annual Production

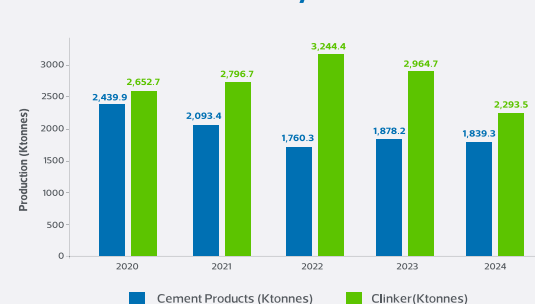


Note: The finished steel production covers rebars, rebar in coils, wire rods, heavy sections, and sheet piles

Emirates Cement

At Emirates Cement, our dedication to operational excellence guarantees the delivery of high-quality products. In 2024, our Cement production was generally consistent with some variations for the majority of the products to accommodate for the changing market demands.

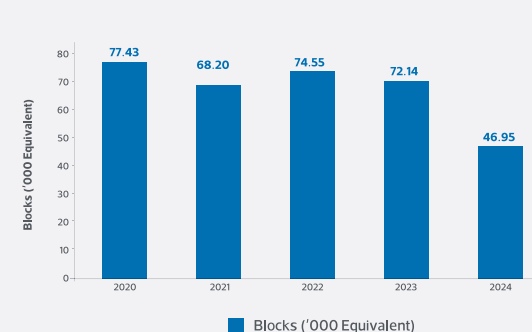
Al Ain Cement Factory Annual Production



Note: Cement products are: Ordinary Portland Cement (OPC), Sulphate Resistant Cement, (SRC), Portland Limestone Cement, Slag and Dry Mortar

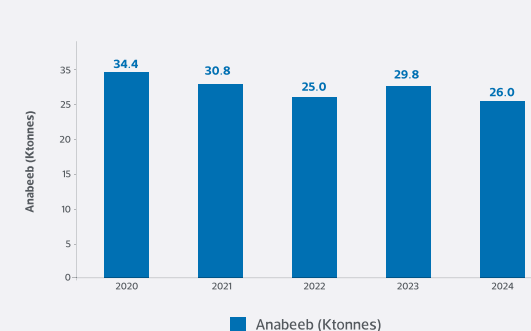
Clinker quantities account for Clinker OPC and Clinker SRC

Blocks Annual Production

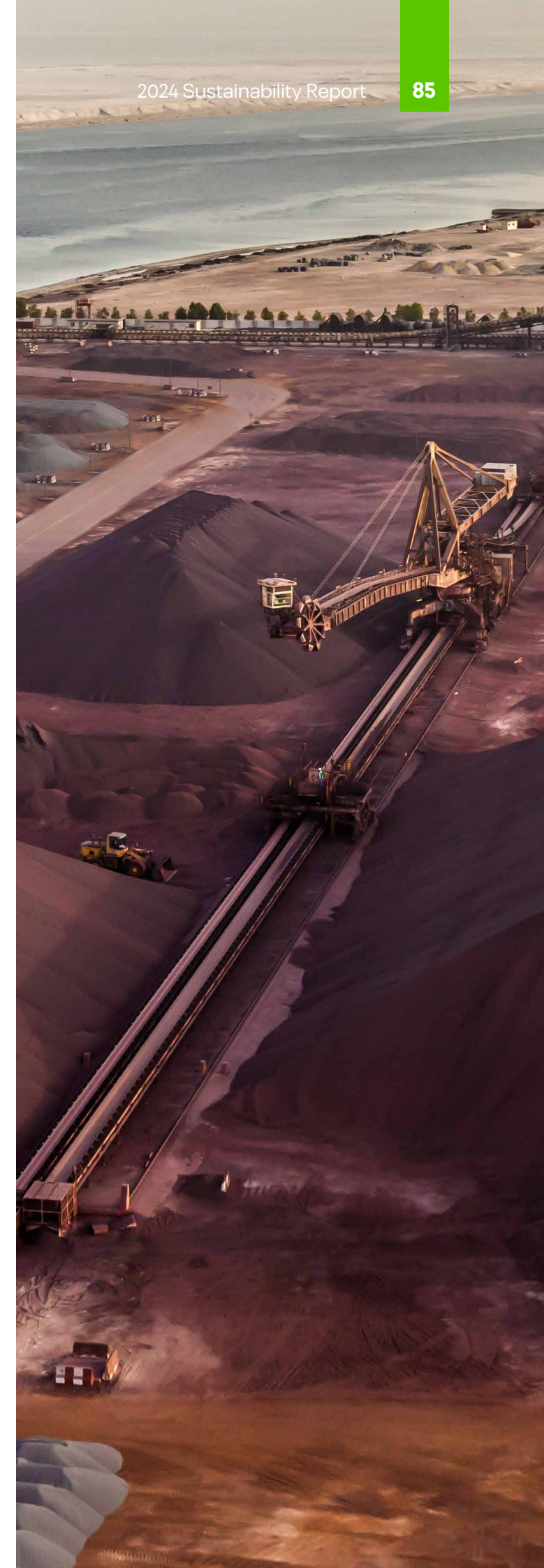


Note: The quantities account for: Blocks, Interlocks and Pavers

Anabeeb Annual Production



Note: The quantities account for: GRP Pipes, GRP Fittings, PVC Pipes, LDPE, PPR, Plastic Bags and Paper Sacks



Operational Efficiency

At EMSTEEL, we recognise that operational efficiency is a vital component of our sustainability strategy, significantly influencing production yield, quality, product competitiveness, and the overall production process.

Our dedication to efficiency is driven by our goal to be a leader in the steel and building materials industry, with a strong focus on rigorous quality assurance and continuous improvement.

By prioritising operational efficiency, we support our broader sustainability objectives, striving to operate more efficiently, reduce operating costs, minimise our environmental footprint, and deliver superior products to our customers.

In 2024, we implemented a number of initiatives not only to enhance productivity and reduce costs but also align with sustainable practices:

SAP S/4HANA Migration:

Moving all SAP applications to the cloud to improve speed, flexibility, and efficiency, supporting digital transformation.

Torque Monitoring for Heavy Section Mill:

Installing a system to track torque during rolling processes, ensuring quality, reducing defects, and improving reliability.

Cold Saw Area Automation:

Upgrading the automation sequence in the RM4 cold saw area to improve efficiency, reduce defects, and lower energy consumption.

Oxide Screen Mesh Upgrade:

Replacing old screen meshes for better material separation, improving product quality, and reducing waste and maintenance costs.

Hazardous Waste Cost Reduction:

Finding alternative vendors for waste treatment to cut costs and minimise environmental impact.

In-House Hydraulic Cylinder Testing:

Performing hydraulic cylinder pressure tests internally to save money, speed up processes, and reduce emissions.

Proximity Switch for RM4 Hot Saw System Door:

Replacing a faulty limit switch with a more reliable proximity sensor to reduce maintenance delays and improve safety.

Case Study



Electrical Process Gas Heater (e-PGH) Technology Partnership

In 2024, we have formed a partnership to explore the application of Danieli's electrical Process Gas Heater (e-PGH) technology at our Direct Reduction Iron (DRI) facility. At the Fifth Danieli Innovation Meeting in Italy, we signed an agreement

with Danieli to test a pilot e-PGH system at our DRI Plant 1. The partnership is a major step towards innovation via electrification and sustainability, aligning with our mission to set new industry standards and support the UAE's vision for industrial leadership.





Emirates Cement

Al Ain Cement Factory has been maintaining ISO 9001:2015, ISO 14001:2015 and ISO 45001 certifications, as well as accreditation from Abu Dhabi and Dubai Central Labs. We have energy management system certification as per ISO 50001, ensuring continuous monitoring, reporting, and optimisation of energy consumption across all operations.

We are committed to providing excellent customer service, including follow-up, complaint resolution, and after sale support, all according to ISO standards.

EMSTEEL’s **Anabeeb** division has proudly achieved the Integrated Management System (IMS) certifications for quality management (ISO 9001:2015), environmental management (ISO 14001), and occupational health and safety management (ISO 45001).

All of our Anabeeb products are Kitemark certified (BS Standard), a trusted independent indicator of quality assurance. Each pipe is assigned a unique serial number and production date, automatically generated by the machine software for full traceability and quality control.

In our **Blocks** Business, we ensure that our products are produced according to project specifications that adhere to both local and international standards.

To provide transparency and traceability for our Blocks customers, each product is labelled with bundle tags that display important information, such as lot numbers and production dates. In this manner, our customers can trust that the blocks they receive are of the highest quality and meet the necessary requirements.

5.7 Customer Engagement & Satisfaction



GRI Standards: 2-29(2021)
CARES SCS: 5.1

Customer satisfaction and improving customer experience remains our key priority – and we achieve it by collecting feedback at every interaction points with EMSTEEL. We aim to collect and process feedback from our valued customers that encompasses all facets of our business and deploy various tools including quarterly evaluations of the purchasing process and annual assessments of our value proposition to ensure it aligns with our customers’ needs.

Customer Relationship Management (CRM)

Our new Customer Relationship Management (CRM) solution has been designed to put the customer at the centre of all our activities and interactions. We have significantly enhanced the system in 2024 to include advanced features like the handling of customer complaints, providing a comprehensive customer 360 view, and storing a vast amount of transactional data accessible through a single system. Functionality of the system is continuing to be expanded with a goal of having a single solution for all customer related activities and data.

Table 5-6. Emirates Steel Customer Engagement

Description		2020	2021	2022	2023	2024
Customer return rate		100%	100%	100%	100%	100%
Satisfaction Rate *		80.07%	80.75%	80.75%	-	-
Complaints	Number	75	49	76	62	59
	Resolved	75	49	76	62	56

* 2024 customers survey results to be released by March 2025

Table 5-7. Emirates Cement Customer Engagement

Description		2022	2023	2024
Customer return rate		92%	95%	98%
Satisfaction Rate		87%	88%	72%
Complaints	Number	29	10	30
	Resolved	29	10	30

Sustainable Product Development

ES600 is an innovative high-strength rebar that's set to revolutionize sustainable construction practices. As the world embraces a future of environmental responsibility and resource conservation, ES600 takes centre stage as a game-changing solution designed to reshape the construction landscape. ES600 is not just a product; it's a philosophy that embodies sustainable construction ideals. ES600 enables a reduction of 8% to 24% in rebar consumption, depending on project design and structural requirements.

Voice of the Customer (VoC) Enhancement

This year, our Voice of the Customer (VoC) process is undergoing a complete redesign, starting with a revamped Customer Satisfaction Survey process that provides a full review of all aspects of the business important to our customers and captures more qualitative insights from key customers.

This process is now managed by third-party experts to ensure the highest quality and reliability of data and includes in-person and online interviews, as well as a comprehensive online survey – allowing our customers flexibility and a more personalised approach to sharing feedback with EMSTEEL.

Furthermore, the new VoC process includes plans to obtain more frequent feedback, enabling real-time monitoring of key parameters and allowing for quicker responses to changing customer perceptions and needs. We are intending to automate this process and integrate with our CRM solution, providing real-time feedback and accurate trends in our customers' feedback - with the goal of improving customer experience further.

We offer grievance mechanisms through our website, allowing customers and stakeholders to report complaints easily. Our mandatory onboarding programme for employees includes training on building responsible relationships with customers and stakeholders. Our 2024 customer satisfaction survey was conducted by a third party to ensure objectivity and remove any bias.

We have a comprehensive system in place to address any complaints from our valued customers. This system includes clear, well-defined steps, starting from providing adequate means for submitting a complaint to ensuring its official closure.



Report a complaint

customer.complaints@emsteel.com

5.8 Innovation & Technology



GRI Standards: 2 (2021)
CARES SCS: 5.3

At EMSTEEL, we leverage innovation and technology to strengthen our global presence and enhance the competitive edge of our products.

In 2024, EMSTEEL initiated cooperation with SAP to establish a robust Enterprise Resource Planning (ERP) foundation by incorporating the latest and best practices. We also signed an agreement with e& UAE to deploy an advanced 5G network. This 5G private virtual network aims to reduce operational costs, improve worker health and safety, and support Industry 4.0 initiatives and extended connectivity.

Recognising the importance of innovation to EMSTEEL, we increased our innovation spend this year by 4% compared to last year. Furthermore, our pursuing innovation rate increased from 2.29 last year to 2.50 in 2024. Our ambitious Namaa initiative provided a structured approach to support the implementation of cost saving initiatives under EXCO oversight. It also improved cross-functional collaboration - creating a solid foundation for value creation.

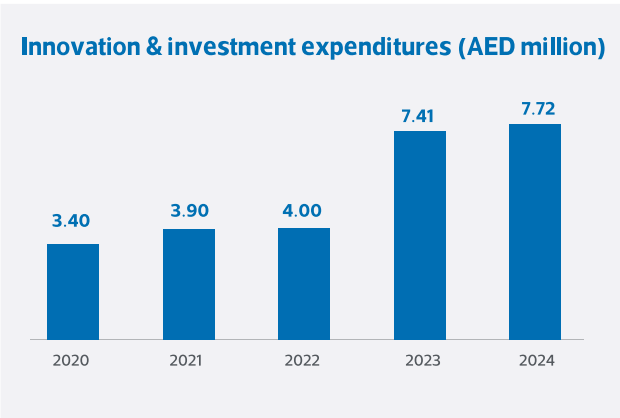
We are driving our digitalisation strategy to maximise the adoption of AI-powered tools and technologies, transforming our operations and setting new industry standards.

We have successfully implemented more than **30 AI-driven solutions**, delivering remarkable impact across our value chain. While digitalisation encompasses a broad spectrum of elements – including connectivity, information security, process automation, robotisation, and cloud adoption – our primary focus is on AI and machine learning (ML).

We believe that in the metals and mining industry, AI/ML solutions have the potential to deliver unparalleled efficiencies, cost savings, and sustainability gains, making them a cornerstone of our strategy.

AI in Metallurgy: Elevating Quality and Efficiency

Maintaining the highest standards in metallurgy requires meticulous adherence to technological processes. The sheer volume of parameters we monitor, and control is staggering – not only within manufacturing but also in commercial operations, finance, health and safety, research and development, and beyond. AI helps us harness this complexity, optimising our processes while improving productivity and safety.



This year has seen several groundbreaking AI-driven innovations by EMSTEEL, including:

AI-based Solutions for Better Worker Experience

As we strive to incorporate innovative solutions to improve the work experience of our employees, we have launched our support platforms, Sanaad AI and Musaad AI. They are accessible through various channels such as MS Teams, WhatsApp and internal portal. These AI-based platforms efficiently assist our employees with their HR-related queries and IT requests.

Optimising Complex Industrial Processes

We have deployed AI-driven predictive solutions for key energy-intensive operations such as electric arc furnaces, direct reduction plants, and rolling mills. These solutions optimise technological parameters, significantly enhancing both environmental and financial performance. The rapid adoption by our teams reinforces our confidence in this strategic direction.

Enhancing Workplace Safety with AI & Computer Vision

Our AI-powered safety camera system integrates computer vision technology to prevent workplace accidents. By detecting the absence of personal protective equipment (PPE) and identifying unsafe behaviours in real time, we are taking our health, safety, and environmental (HSE) standards to unprecedented levels.

Pioneering AI-Led Green Steel Certification

As part of our commitment to sustainability, EMSTEEL has launched the **world's first AI-led Green Steel Monitoring & Certification System**. This cloud-based platform enables heat-level emissions calculations, ensures blockchain-enabled traceability, and even supports a digital wallet for carbon credits – reinforcing our leadership in sustainable steel production.



30+ AI Driven Solutions have been successfully implemented

Our commitment to Industry 4.0 innovation has been recognised with five prestigious **“UAE Industry 4.0 Digital Leader”** awards from the Ministry of Industry and Advanced Technology (MoiAT). This achievement underscores our position as a pioneer in digital transformation within the metals and mining sector.

Data Privacy and Security


We are committed to ensuring data privacy and security at EMSTEEL with an Information Security Policy in place as well as a Data Privacy Policy. We are also in compliance with UAE National Electronic Security Authority (UAE-NESA) Standards, which consist of 188 security controls to ensure data protection across EMSTEEL.

EMSTEEL follows the UAE Information Assurance Standards, which cover most of the ISO 27001 Standards and Controls. Last year, we embarked on our journey to obtain ISO 27001 certification.


In 2024 we continue to engage a third party to complete a deep gap assessment. We are on track to obtain the certification in 2025.

We are proud of our robust and resilient system, which has enabled us to maintain an exemplary record of zero data breaches over the past five years.

ZERO



Number of attempted cyberattacks



Number of data breaches



Research and Development (R&D) Department Establishment

EMSTEEL established its Research and Development (R&D) department in 2024 to drive innovation, sustainability, and efficiency in steel manufacturing. The department focuses on developing advanced steel products, optimising production processes, improving energy efficiency, and integrating cutting-edge technologies.

Key priorities include AI-driven quality control, digital twin technology, and smart energy management. R&D initiatives target low-carbon steel production, waste heat recovery, circular economy solutions, and decarbonisation strategies like hydrogen-based steelmaking. Water conservation is also a focus through smart cooling and wastewater recycling.

06

Appendices



Appendix A: List of Abbreviations

Abbreviation	Definition
ACF	Al Ain Cement Factory
ACRS	Australasian Certification Authority for Reinforcing and Structural Steels
ADCDA	Abu Dhabi Civil Defence Authority
ADDC	Abu Dhabi Distribution Company
ADDED	Abu Dhabi Department of Economic Development
ADOSH	Abu Dhabi Occupational Safety and Health
ADQ	Abu Dhabi Developmental Holding Company PJSC branded ADQ
ADVETI	Abu Dhabi Vocational Education and Training Institute
ADX	Abu Dhabi Securities Exchange
AFID	Alliance for Industrial Decarbonization
AGM	Annual General Meeting
ARC	Audit and Risk Board Committee
BCM	Business Continuity Management
BCPs	Business Continuity Plans
BIS	Bureau of Indian Standards
BoD	Board of Directors
BSC	Balanced Scorecard
CAP	Career Aspiration Programme
CARES	Certification Authority for Reinforcing Steel
CBD	Commercial Bank of Dubai
CCS	Carbon Capture and Storage
CDP	The Carbon Disclosure Project
CDW	Construction and Demolition Waste
CEDD	Civil Engineering and Development Department
CEMS	Continuous Emission Monitoring System
CIDB	Construction Industry Development Board
CMT	Crisis Management Team
COC	Code of Conduct
CRM	Customer Relationship Management
CSR	Corporate Social Responsibility
CSRD	Corporate Sustainability Reporting Directive
CWM	Centre of Waste Management Abu Dhabi
DCL	Dubai Central Laboratory
DMA	Double Materiality Assessment

Abbreviation	Definition
DRI	Direct Reduction Iron
DRP	Direct Reduction Plant
EAD	Environment Agency - Abu Dhabi (EAD)
EAF	Electric Arc Furnace
EBF	Emirates Blocks Factories
ECAS	Emirates Conformity Assessment Scheme
ECEMP	Construction Environmental Management Plan
EHS	Environment, Health, and Safety
EIA	Environmental Impact Assessment
EISF	Emirates Iron and Steel Factory
EOR	enhanced oil recovery
EPD	Environmental Product Declaration
e-PGH	Electrical Process Gas Heater
ERP	Enterprise Resource Planning
ERPs	Emergency Response Procedures
ESG	Environmental, Social and Governance
ESMA	Emirates Authority for Standardisation and Metrology
ESPs	Environment Service Providers
ESRS	European Sustainability Reporting Standards
EXCO	Executive Committee
FTE	Full Time Equivalent
GCCA	Global Cement and Concrete Association
GCPO	Group Chief People Officer
GHG	Greenhouse Gas
GJ	Giga Joule
GRI	Global Reporting Initiative
GRP	Glass Reinforced Plastic
GWP	Global Warming Potential
HAAD	Health Authority of Abu Dhabi
HIRA	Hazard Identification and Risk Assessment
HSE	Health, Safety, and Environment
ICAD	Abu Dhabi Industrial City
ICV	In Country Value
IDB	Industrial Development Bureau
IDP	Individual Development Plans
ILO	International Labour Organisation

Abbreviation	Definition
IMD	International Institute for Management Development
IMS	Integrated Management System
IRENA	International Renewable Energy Agency
JSA	Job Safety Analysis
KPIs	Key Performance Indicators
L&D	Learning and Development
LCAs	Lifecycle Assessments
LMS	Learning Management System
LRF	Ladle Refining Furnace
LTI	Lost Time Injuries
LTIFR	Lost-Time Injury Frequency Rate
ML	Machine Learning
MOCCAE	United Arab Emirates Ministry of Climate Change and Environment
MoiAT	Ministry of Industry and Advanced Technology - MOIAT
MoU	Memorandum of Understanding
MSCI	Morgan Stanley Capital International
NDC	Nationally Determined Contributions
OEMP	Operational Environmental Management Plan
ODS	Ozone-Depleting Substance
OH&S	Occupational Health and Safety
OJT	On-the-Job Training
OPC	Ordinary Portland Cement
OSHAD	Occupational Safety and Health Abu Dhabi
PAI	Public Authority for Industry
PLC	Portland Limestone Cement
PPE	Personal Protective Equipment
PSIF	Potential Serious Injury and Fatalities
PTW	Permit To Work
PVC	Polyvinyl Chloride
PWL	Public Works Laboratories
QCC	Quality and Conformity Council
RCA	Root Cause Analysis
RDF	Refuse Derived Fuels
RM	Risk Management
RO	Reverse Osmosis

Abbreviation	Definition
RPO	Recovery Point Objective
RTO	Recovery Time Objective
SASB	Sustainability Accounting Standards Board
SCA	Securities and Commodities Authority
SCS	CARES Sustainable Construction Steel
SDGs	Sustainable Development Goals
SEMIS	Semi-Finished Steel Products
SF LMS	SuccessFactors Learning Management System
SH	Stakeholder
SIF	Serious Injuries and Fatalities
SIRIM	Standard and Industrial Research Institute of Malaysia
SMPs	Steel Making Plants
SOPs	Standard Operating Procedures
SRC	Sulphate Resistant Cement
TCFD	Task Force on Climate-Related Financial Disclosures
TJ	Terajoule
TRI	Total Recordable Injuries
TRIFR	Total Recordable Injury Frequency Rate
UAE	United Arab Emirates
UAE-NESA	UAE National Electronic Security Authority
UNSDGs	United Nations Sustainable Development Goals
VoC	Voice of the Customer
WBCSD	World Business Council for Sustainable Development
WDS	Waste Disposal System
WEF	World Economic Forum
WGEO	World Green Economy
WMP	waste management plan
WSA	World Steel Association
WTPs	Water Treatment Plants

Appendix B: EMSTEEL Climate Resilience

EMSTEEL aligns its decarbonisation efforts with global climate requirements, integrating TCFD and CDP requirement into its practices for Governance, Strategy, Risk Management and Metrics & Targets. Moreover, the company’s expertise in evaluating climate change impacts and addressing associated risks underscore its dedication to environmental stewardship and resilience.

EMSTEEL’s Environment, Social and Governance (ESG) Board Committee ensures that environmental, social and governance principles are integrated into all aspects of our operations. This committee oversees our company’s strategies and initiatives, and the development of an ESG strategy focusing on climate change and long-term sustainability. Additionally, we implemented an ESG policy that outlines our dedication to environmental stewardship, social responsibility and governance, which guide all our business activities.

Risk management is fundamental to EMSTEEL’s operational continuity and the realisation of its long-term objectives and vision. Accordingly, EMSTEEL has formulated a comprehensive approach to assess climate-related financial risks and opportunities across varying timeframes –short, medium, and long term. These risks and opportunities are identified through a multifaceted risk assessment process, incorporating structured evaluations, collaborative brainstorming sessions and inputs from all key stakeholders.

The following table shows the criteria that Emirates Steel utilised to identify and evaluate climate-related risks and opportunities.

Time horizon	Short term: 2022 to 2025 Medium term: 2026 to 2030 Long term: 2031 to 2050
Assessment of risks and opportunities	Likelihood of occurrence. Level of severity of financial Impact. Residual Risk Rating
Types of risks and opportunities	Transition risks: Policies and laws, technology, market, reputation Physical risks: Acuteness, chronicity. Opportunities: Resource efficiency, energy sources, technology, and market resilience.
Setting a climate scenario	1.5°C scenario

Climate Risk Impact and Resilience

Potential financial impact	Risk Impact and Resilience	Risk Type
40~50 million USD	<p>Extreme weather events, such as heatwaves, heavy winds and heavy rainfall, have the potential to disrupt the steel industry’s supply chain, resulting in reduced productivity across the entire value chain of steel products. This disruption may manifest as delays in the supply of raw materials, decreased production volumes, and a decline in demand for finished steel products. Moreover, heatwaves are projected to decrease global working hours by over 2% by 2030, as reported by the International Labour Organisation, translating to potential annual financial losses of approximately \$40 million. Considering a conservative annual growth rate of 1%, the decline in sales could reach \$50 million per year by 2030.</p> <p>Emirates Steel integrates climate change scenarios into assessments and collaborates with local authorities for effective response strategies. To mitigate severe heatwave impacts on production and ES employees, options such as hiring additional staff or extending working hours could be considered, incurring estimated annual expenses of \$4-5 million.</p>	Acute physical

Potential financial impact	Risk Impact and Resilience	Risk Type
100 ~ 240 million USD	Risk of flooding and sea level rise were considered in our Climate Risk register, especially since our operation facilities are located in coastal area. This risk could affect our productivity and have the potential to impact our RO plants’ operation and our jetty equipment operation. We collaborate with the UAE government to monitor climate risks, which are assessed within the UAE’s Climate Adaptation Plan. Various measures are proposed to address priority risks to the infrastructure sector under different scenarios of temperature increase.	Chronic physical
45~90 million USD	The global green steel market is forecasted to grow significantly, reaching approximately \$100 billion by 2030 with an annual growth rate of around 70%. ES anticipates strong growth in its green steel business, contingent upon achieving substantial emissions reductions by 2030. Failure to meet climate goals could result in missed revenue opportunities ranging from \$45 to \$90 million per year. To address this risk, ES conducts ongoing analysis of steel industry trends to anticipate impacts on demand and supply chains. Recognising the potential for reduced market share and higher capital expenditures, we are considering accelerating our Carbon Neutral strategy as a countermeasure.	Market
280 million USD till 2030	EMSTEEL adopted DRP technology which is less in CO ₂ emission by 50% from BF route which puts less burden on our strategy for huge emission reduction compared to blast furnaces. However, we understand that technological advancements are crucial for decarbonisation. Our strategy, requiring a minimum of USD 280 million between 2024-2030, targets intermediate reductions by 2030. Yet, it’s prudent to acknowledge that actual costs might surpass this projection, especially if adopting costlier solutions becomes imperative to decarbonise our operations. Consequently, EMSTEEL estimates a requirement of over \$700 million to decarbonize completely.	Technology
50~250 million USD	In our materiality assessment, market presence and company reputation emerged as significant concerns. Recognising the risk of market share loss due to failure in CO ₂ reduction, we incorporated it into our risk register and tailored our carbon reduction strategy to align with stakeholder expectations. Research from Clarity AI highlights the financial impact, suggesting that companies facing ESG controversies may underperform by 2-5% compared to peers with strong ESG performance, with potential market value losses of 2-9% for those with poor environmental reputations. Factoring in these insights, we anticipate market losses for ES ranging from \$50 to \$250 million. To comply with emission expectation, we’ve developed an ambitious yet feasible decarbonisation strategy, prioritising energy efficiency, renewable electricity, scrap utilisation, and green hydrogen to meet our interim reduction goals by 2030.	Reputation
120~650 million USD	<p>One of the most significant risks that has been identified is carbon emission cost and non-compliance with Emission trade mechanism such as CBAM. Also, Carbon taxes policy will be imposed soon by UAE government which will cause cost increase on our products. So, failure to reduce our direct and indirect emission will lead to applying more cap and taxes on ES’s product and loss the competitive advantage in global market.</p> <p>Anticipating future carbon taxes, we estimate potential carbon costs ranging from \$20 to \$105 per ton of CO₂, similar to EU-ETS and CBAM allowances. Using the CBAM methodology, we project production cost increases of \$120 to \$650 million between 2026 and 2034. This underscores the importance of strategic planning to navigate evolving carbon regulations effectively.</p>	Emerging regulation

Appendix C: Stakeholder Engagement Map

Category	Stakeholders	Key Issues	Expectation	Engagement Method (Frequency)	Actions/Outcomes
Internal	Shareholders, Board of Directors	<ul style="list-style-type: none">Corporate GovernanceSustainable Business GrowthQuality, Environmental, Health & Safety, Energy, Social and Financial PerformanceImproved operational efficiency	<ul style="list-style-type: none">Sustainable growth and shareholder returnContribution to local economyLeading steel manufacturer	<ul style="list-style-type: none">Board Information Pack (quarterly, annual)Board/Committee meetings (quarterly, as required)Site visits and correspondences (as required)Media releases and publications (as required)	<ul style="list-style-type: none">Developed and integrated corporate governance policies to core business activitiesIdentified key business risksDefined management plansDeveloped long-term and short-term strategic goals and objectives.Corporate Social Responsibility programmesNamaa project
Internal	Top Management	<ul style="list-style-type: none">Company's vision, mission and core valuesBusiness strategy and planningBusiness strategy and planningCompany BSC/ KPIsCustomer satisfactionRisks and opportunitiesQuality, Environmental, Health & Safety, Energy, Social, Financial PerformanceImproved operational efficiencyManagement of changeInternal & External CommunicationsEmployees Happiness	<ul style="list-style-type: none">Understanding of company vision, mission and core values across the organisationStrictly adhere to company's ethics and cultureStrong safety culture and safety excellenceAchievement of company BSC/ KPIs / EnPIsHigh customer satisfactionImproved business performanceMitigation of risks and taking advantage of opportunitiesMitigate any adverse effects arising from unplanned changesImproved performance of IMS and desired outputs	<ul style="list-style-type: none">EXCO/Top Management meeting (as required)Regular progress reporting of strategy implementation, monitoring and review of BSC/ KPIs (as required)Management review meeting (monthly/ quarterly)Operation meetings (weekly /monthly)HSE ExCo Meeting (monthly)Operations Function HSE Meetings (monthly)Non-operation Function HSE Meeting (monthly)Energy Reviews (as required)	<ul style="list-style-type: none">Established Vision, Mission, Core Values and Company PolicyCode of Ethics PolicyHSE Principles and Life Saving RulesSafety Excellence Transformation Programme (AMAN)Established BSC/ KPIsEstablished EnBs / SEUs / EnPIsCustomer feedback process, Perception SurveyRisk Management frameworkCorporate Social Responsibility programmesDefined management Action PlansChange Management plansImprovement in IMSPlant efficiency and capacity enhancementProduct quality Improvements and conformityCompany website and Intranet (Steel Hub)Namaa projectHappiness Committee

Category	Stakeholders	Key Issues	Expectation	Engagement Method (Frequency)	Actions/Outcomes
Internal	Employees	<ul style="list-style-type: none">Employee Health, Safety and work environmentRemuneration and benefitsEffective leadership and supervisionEmployee trainings and competency developmentDeveloping high potential employees Recognition and rewardsEffective career development programmeEmployee performanceEmployees empowerment and accountabilityOrganisational knowledgeEnergy use and consumption	<ul style="list-style-type: none">Opportunities for personal and professional development and successProvide a safe, healthy and environment-friendly workplace and welfare & wellbeingJob securityReward & recognition; competitive compensationEnergy efficiency	<ul style="list-style-type: none">Face to face communication (as required)Emails and other correspondence (as required)On-line Employee Services System and correspondences (as required)Safety tours and site visits (monthly, quarterly)Internal training and toolbox talks (as per plan, as required)Participation in external training programmes, seminars, conference etc. (as required)Performance review (semi-annual, annual)Employee Engagement Survey Internal communication email blasts (as required)Behavioural Observations (monthly)Middle Management Meeting (quarterly)Town-hall MeetingAccelerated Young Leaders ProgrammeCompany programmes and events (as scheduled)Operations Department HSE Meeting (monthly)H&S Department HSE Meeting (monthly)Events & Recreation Programme Survey (annual)Suggestion schemes and grievance procedureCompany website, press releases, social media postsViolation ReportingHC Forum (quarterly)Energy Reviews (as required)	<ul style="list-style-type: none">Safety Champions RecognitionBehavioural safety toursIncreased involvement of top management in EHS programmes and initiatives- Aman Safety ExcellenceReview and updating of HC policies and procedures, including compensation and benefits, training and career development plans, Performance Management System, awards and recognitions, etc.Communication of company policies, objectives and performanceDevelopment of talents through Bedayati ProgrammeFuture Leaders Programme, Talent Acquisition ModuleThink Smart (online suggestion scheme)Tamkeen- Emirati Women's CommitteeSANAAD HC Digital PlatformInternal promotions and organisational changesEnhanced competence and improved performance of employeesCareer Aspiration ProgrammeLearning Management System (LMS)mySHEQ applicationKnowledge Management HubRisk & BCM CommunityYouth CouncilYammer PlatformEnergy Management Team
External	Lenders and Financial Institutions	<ul style="list-style-type: none">Ability for repaymentsCompany reputation for ethical business practicesPotential liabilities due to environmental and social issues	<ul style="list-style-type: none">Business performanceTransparency and corporate governanceEnvironmental and Social risks	<ul style="list-style-type: none">Financial reports (annual)Meetings and correspondences (as required)	<ul style="list-style-type: none">Corporate governance policies and proceduresFinancial controls, management and investmentsThird party audits

Category	Stakeholders	Key Issues	Expectation	Engagement Method (Frequency)	Actions/Outcomes
External	Customers	<ul style="list-style-type: none">Products and management system certificationsCompetitive priceCustomer complaintsGreen building schemesEthical Business Practices	<ul style="list-style-type: none">Product quality and availabilityProduct Innovation and solutionsProduct cost and value creationReliable and efficient customer serviceOn time delivery	<ul style="list-style-type: none">Customer meeting/ visits (monthly or as required)Perception (Customer Satisfaction) SurveyCustomer complaint meeting (monthly or as required)Events, conferences and exhibitions (as scheduled)Project prequalification and tendering (as scheduled)Brochures, product cataloguesCompany website, press releases and social media postsViolation Reporting	<ul style="list-style-type: none">Effective implementation of IntegratedManagement System (IMS)Market research and pricing committeeCustomer complaint managementProduct Research and DevelopmentCommunication with authorities on product regulations and important dutiesEnvironmental Product Declaration reportsProduct and management system certificationsSustainable Constructional Steel CertificationCorporate governance policies
		<ul style="list-style-type: none">Quality, environment, energyEnvironment health & safety issuesCost reduction and value creationLong-term business relationsCompliance and corporateGovernance policies	<ul style="list-style-type: none">Quality products and servicesResponsible sourcing principlesSustainable Supply Chain practicesEthical business practiceLong term contracts to ensure sustainable demand	<ul style="list-style-type: none">Direct communications through meetings, phone calls and emailsInquiries, coordination and clarification meetingsSite visits and supplier audits (annual or as required)Supplier Feedback Survey (annual)Training and awareness sessions (as scheduled)Contractors HSE Meeting (monthly)Awards/recognition events (as scheduled)Company website, press releases and social mediaViolation Reporting	<ul style="list-style-type: none">Supply Chain Policies, manual and proceduresSupplier Qualification and RegistrationSupplier audit and Performance EvaluationPartnership and long-term contract programmeSupply Chain Hub digital platformImprovement of Supply Chain FunctionsContract administrationCode of Ethics and Whistle blowing policiesContractor management and safety programmes
External	Suppliers, service providers and contractors	<ul style="list-style-type: none">Quality, environment, energyEnvironment health & safety issuesCost reduction and value creationLong-term business relationsCompliance and corporateGovernance policies	<ul style="list-style-type: none">Quality products and servicesResponsible sourcing principlesSustainable Supply Chain practicesEthical business practiceLong term contracts to ensure sustainable demand	<ul style="list-style-type: none">Direct communications through meetings, phone calls and emailsInquiries, coordination and clarification meetingsSite visits and supplier audits (annual or as required)Supplier Feedback Survey (annual)Training and awareness sessions (as scheduled)Contractors HSE Meeting (monthly)Awards/recognition events (as scheduled)Company website, press releases and social mediaViolation Reporting	<ul style="list-style-type: none">Supply Chain Policies, manual and proceduresSupplier Qualification and RegistrationSupplier audit and Performance EvaluationPartnership and long-term contract programmeSupply Chain Hub digital platformImprovement of Supply Chain FunctionsContract administrationCode of Ethics and Whistle blowing policiesContractor management and safety programmes
		<ul style="list-style-type: none">Emissions and DischargesEHS Management SystemImplementationIncidents and emergenciesEnvironmental complaintsStatutory and regulatoryCompliance	<ul style="list-style-type: none">Regulatory ComplianceEnvironment, Health & Safety performanceEnergy PerformanceContribution to local economyClimate ChangeSelf-regulation	<ul style="list-style-type: none">Direct communication through meetings, phone calls and emails. (As required)Conferences, forums and workshops (as required)Site visits, inspections and audits (as required)Company website and publications	<ul style="list-style-type: none">Audit, inspections, monitoring and reportingIncident Notification, Investigation and reportingImplementation of environmental projectsCarbon capture and storage projectBusiness Continuity and Emergency proceduresRegular performance and compliance reportingEnvironmental Projects and Initiatives
External	Regulatory Authorities	<ul style="list-style-type: none">Emissions and DischargesEHS Management SystemImplementationIncidents and emergenciesEnvironmental complaintsStatutory and regulatoryCompliance	<ul style="list-style-type: none">Regulatory ComplianceEnvironment, Health & Safety performanceEnergy PerformanceContribution to local economyClimate ChangeSelf-regulation	<ul style="list-style-type: none">Direct communication through meetings, phone calls and emails. (As required)Conferences, forums and workshops (as required)Site visits, inspections and audits (as required)Company website and publications	<ul style="list-style-type: none">Audit, inspections, monitoring and reportingIncident Notification, Investigation and reportingImplementation of environmental projectsCarbon capture and storage projectBusiness Continuity and Emergency proceduresRegular performance and compliance reportingEnvironmental Projects and Initiatives
		<ul style="list-style-type: none">Emissions and DischargesEHS Management SystemImplementationIncidents and emergenciesEnvironmental complaintsStatutory and regulatoryCompliance	<ul style="list-style-type: none">Regulatory ComplianceEnvironment, Health & Safety performanceEnergy PerformanceContribution to local economyClimate ChangeSelf-regulation	<ul style="list-style-type: none">Direct communication through meetings, phone calls and emails. (As required)Conferences, forums and workshops (as required)Site visits, inspections and audits (as required)Company website and publications	<ul style="list-style-type: none">Audit, inspections, monitoring and reportingIncident Notification, Investigation and reportingImplementation of environmental projectsCarbon capture and storage projectBusiness Continuity and Emergency proceduresRegular performance and compliance reportingEnvironmental Projects and Initiatives

Category	Stakeholders	Key Issues	Expectation	Engagement Method (Frequency)	Actions/Outcomes
External	Certification Bodies	<ul style="list-style-type: none">Effective implementation of management systems.	<ul style="list-style-type: none">Conformity to certification and technical standards	<ul style="list-style-type: none">Direct communication through meetings, phone calls and emails (as required)Audits, inspections and site visits (semi-annual, annual)Conferences, forums and workshops (as scheduled)Company website and publicationsParticipation in Working Group meetings	<ul style="list-style-type: none">Implementation of Integrated Management SystemInternal audits and inspectionsRegulations, standards and scheme reviewsTraining and awareness
		<ul style="list-style-type: none">Government regulations and initiativesIndustrial and economic challengesEnvironment, Health & safetyWater, energy and material consumption and wastes	<ul style="list-style-type: none">Responsible and ethical business practiceIndustry best practice and benchmarkingInnovation and value creation	<ul style="list-style-type: none">Meetings, presentations and site visits (as required)Project collaboration and studies (as required)Technical conferences, workshops and forumsExhibitions, sponsorships and industry eventsWebsites and social media postsPublications and press releases, brochures and catalogues	<ul style="list-style-type: none">Active involvement in industry and business community initiativesEndorsement of policies to industrial sectors and authoritiesSharing of best practice and benchmarkingRecycling, reuse of by-products and wastesActive participation in World Steel Association (WSA) programmesActive member of WSA Climate Action and Sustainability ProgrammesBenchmarking activities
External	Local society and community	<ul style="list-style-type: none">Occupational health and safety issues.Emissions and environmental complaintsEmployment and EmiratisationPromoting local products and business initiatives	<ul style="list-style-type: none">Supporting community development and local economyEnvironmental protection and cultural heritage preservation	<ul style="list-style-type: none">Community and medical out-reach programmesCultural eventsTraining and awareness sessionsSite visits, plant toursScholarships and internship programmeCharity projects and volunteering in community servicesConferences and SeminarsBrochures, press release and social media postsViolation ReportingCompany website and social media platforms	<ul style="list-style-type: none">Promoting health and safety program and improving EHS performanceEmiratization and career development programme for UAE nationalsScholarships and work placement programmesCultural, community and charity programmes and sponsorshipsCorporate Social Responsibility programmesCommunication through social media
		<ul style="list-style-type: none">Occupational health and safety issues.Emissions and environmental complaintsEmployment and EmiratisationPromoting local products and business initiatives	<ul style="list-style-type: none">Supporting community development and local economyEnvironmental protection and cultural heritage preservation	<ul style="list-style-type: none">Community and medical out-reach programmesCultural eventsTraining and awareness sessionsSite visits, plant toursScholarships and internship programmeCharity projects and volunteering in community servicesConferences and SeminarsBrochures, press release and social media postsViolation ReportingCompany website and social media platforms	<ul style="list-style-type: none">Promoting health and safety program and improving EHS performanceEmiratization and career development programme for UAE nationalsScholarships and work placement programmesCultural, community and charity programmes and sponsorshipsCorporate Social Responsibility programmesCommunication through social media
External	Media	<ul style="list-style-type: none">Availability of information for market research and campaignsPromotion of new products and innovationsReliable and timely information	<ul style="list-style-type: none">Information on latest news, trends, events and industry practices to public or interested partiesJournalism ethics and transparency	<ul style="list-style-type: none">Public and POS advertisementsEventsFace to face meetingsCase studiesAnnual reportsPress releases and social media postsBrochures, catalogues and flyersCompany website and social media platforms	<ul style="list-style-type: none">Publishing, posting or press release of news, events and awards.Interviews, site visits and use of reliable media platformsFollow-up and verification of informationUse of different social media platforms forInternal and External communications
		<ul style="list-style-type: none">Availability of information for market research and campaignsPromotion of new products and innovationsReliable and timely information	<ul style="list-style-type: none">Information on latest news, trends, events and industry practices to public or interested partiesJournalism ethics and transparency	<ul style="list-style-type: none">Public and POS advertisementsEventsFace to face meetingsCase studiesAnnual reportsPress releases and social media postsBrochures, catalogues and flyersCompany website and social media platforms	<ul style="list-style-type: none">Publishing, posting or press release of news, events and awards.Interviews, site visits and use of reliable media platformsFollow-up and verification of informationUse of different social media platforms forInternal and External communications

Appendix D: Maturity Matrix

Sustainability Principles	Practices	Maturity	Characteristics of the approach to sustainability in developing organisation	Objectives & Plan(s) / Programme(s)
Inclusivity	Stakeholder identification and mapping	Proactive and learning	EMSTEEL considers internal and external stakeholders: employees, managers, shareholders, community, suppliers, customers, etc... The company is also identifying new and potential stakeholders from new markets, new customers, suppliers, impending regulations, government policies etc. which might be relevant to company's objectives and activities.	▪ Stakeholder identification and mapping reviewed on a regular basis and documented in the stakeholder engagement map
	Open engagement in various formats for various stakeholders	Engaged	Different methods and platforms are used in engaging different stakeholders to ensure the effectiveness, efficiency, and timeliness of engagement activity such as personal visits, interviews, research, surveys, press releases, the internet, social media, publications, forums, conferences, meetings, events and emails.	▪ Expand digital platforms, direct consultations, and annual ESG forums to enhance multi-stakeholder engagement. Establish a dedicated communication channel or mechanism for receiving feedback and inquiries related to sustainability reporting, recommendation, idea feedback related to ESG matters.
	Stakeholder issue identification	Proactive and learning	Stakeholder concerns are documented in an engagement map, reviewed regularly and discussed in management meetings to define action plans. The company conducts double materiality assessments to prioritise issues based on their financial and environmental impact. Additionally, ESG risk registers and governance reviews, ensure continuous tracking and resolution of stakeholder concerns.	▪ Implement an internal tracking system to document concerns and response actions, such as the New Digitalised Customer Relationship Management (CRM) system.
	Communication of organisation response to issues raised	Engaged	EMSTEEL communicates responses to stakeholder issues through structured engagement, including surveys, meetings, and digital platforms. Customer complaints, employee grievances, and supplier concerns are addressed via formalised channels, with governance oversight ensuring timely resolution. ESG-related feedback is integrated into board discussions, and response effectiveness is periodically reviewed.	▪ Disclose all topics evaluated in the materiality assessment, including those with lower scores, to ensure transparency. Enhancing materiality reporting with a procedure covering a structured methodology for materiality assessment. Establish a communication plan to inform internal and external stakeholders about the ESG and Decarbonisation strategy.
Integrity	Leadership shown - clear Accountabilities documented	Proactive and learning	<p>EMSTEEL demonstrates strong leadership and accountability in ESG through its ESG Committee appointed by the Board of Directors, which provides oversight on sustainability strategies, policies, governance, climate-related and social initiatives. Accountabilities of the ESG Committee are documented in the ESG Committee charter.</p> <p>The ESG Steering Committee led by GCEO acts as an advisory body to ensure company-wide implementation, with clearly assigned roles and responsibilities in ESG governance. A dedicated ESG and Sustainability function is in place and an ESG and Sustainability Centre of Excellence with members from all functions.</p> <p>Accountability is further reinforced through periodic performance reviews and linking ESG KPIs to executive compensation.</p> <p>Emirates Steel has been awarded several recognitions and has obtained certifications and approval from different certification bodies.</p> <p>EMSTEEL is also an active member of world steel and regularly participates in safety and CO₂ data collection programmes.</p> <p>EMSTEEL became a member of the ResponsibleSteel</p>	▪ Planned regular Board training on ESG, sustainability, and decarbonisation.

Sustainability Principles	Practices	Maturity	Characteristics of the approach to sustainability in developing organisation	Objectives & Plan(s) / Programme(s)
	Code of Conduct adopted	Proactive and learning	EMSTEEL has implemented a Code of Conduct (COC) that governs ethical behaviour, compliance, and integrity across all operations. The COC outlines key principles such as anti-corruption, anti-bribery, human rights, workplace conduct, and supplier relations. All employees are required to sign the COC upon joining, with periodic renewals based on job grade, and mandatory training is conducted as part of the onboarding. Additionally, EMSTEEL enforces a Whistleblower Policy, Fraud Control Policy, and Disciplinary Procedures to ensure compliance and accountability. Suppliers must also adhere to EMSTEEL's Code of Conduct as part of their registration, promoting ethical practices throughout the supply chain.	▪ Mandate employee training on ethics, fraud, and whistleblowing, targeting 90% participation by 2026.
	Integrity risks identified and managed	Proactive and learning	<p>EMSTEEL actively identifies and manages integrity risks through a structured Fraud Risk Assessment, conducted annually by the Risk and Business Continuity Management (BCM) Team. High-risk areas are identified and monitored, with mitigation strategies documented in the Business Integrity & Ethics Management Plan. The company has a comprehensive anti-corruption framework, including Anti-Bribery and Corruption Policy, Fraud Control Policy, and Whistleblowing Procedures, ensuring ethical business conduct. Reported violations are investigated confidentially by the Ethics Review Committee, which oversees corrective actions and sanctions where necessary. Additionally, EMSTEEL assesses 100% of its operations for corruption risks, with an externally verified whistleblowing system available to employees, suppliers, and customers.</p> <p>The audit and risk board committee (ARC) ensures board-level oversight, maintaining transparency and accountability in all risk mitigation efforts.</p>	▪ The ESG risk register matrix to encompass aspects of data governance, including data sources, collection, collation, calculation, and verification. Additionally, it should address risks related to reporting integration and stakeholder engagement. Implement anti-corruption audits, enhance supplier due diligence, and ensure 100% of operations undergo corruption risk assessment.
Stewardship	Sustainable development culture	Engaged	The company conducts regular ESG training, engagement activities, and behavioural safety tours to instil sustainability awareness among employees. A dedicated ESG Board Committee oversees sustainability strategies, ensuring alignment with corporate goals and national policies. ESG KPIs are embedded in the company's balanced scorecard, reinforcing sustainability accountability across all functions. Additionally, EMSTEEL promotes a culture of innovation using NAMAA (efficiency and innovation programme) and ESG integration through strategic partnerships, incentivisation models, and continuous improvement frameworks	▪ Broaden NAMAA's idea submission criteria to include ESG aspects beyond energy and cost savings. Establish an ESG Champions Programme with a reward and recognition system to incentivise ESG contributions. Implement comprehensive ESG training, making basic training mandatory for all employees, with effectiveness measured through feedback and performance assessments. Launch an ESG cultural transformation programme, integrating sustainability KPIs into performance evaluations to embed ESG principles across the organisation.

Sustainability Principles	Practices	Maturity	Characteristics of the approach to sustainability in developing organisation	Objectives & Plan(s) / Programme(s)
	Responsible/ Sustainable Supply chain approach adopted	Engaged	The company enforces a Supplier Code of Conduct, requiring all suppliers to adhere to responsible sourcing policies, including compliance with human rights, labour rights, and environmental regulations. A supplier ESG assessment questionnaire has been implemented. Tier 1 suppliers must document their own responsible sourcing commitments, which are tracked through the Supply Chain Hub Platform, ensuring transparency. EMSTEEL has also set local procurement targets, aiming for 50% local procurement spend by 2030 and 90% of ICV-certified suppliers. Supplier engagement is reinforced through training, ESG workshops, and responsible sourcing KPIs, as part of performance management.	<ul style="list-style-type: none">Expand the training offered to suppliers, providing more comprehensive coverage of sustainability-related topics to include detailed sessions on ESG practices, responsible sourcing, and sustainability initiatives. Screen 100% of critical suppliers for ESG compliance and ensure 90% of suppliers are ICV-certified by 2030.
	Systematic Environmental Management	Proactive and learning	Certified environmental management system (ISO 14001) covering all company's operation. The company applies Environmental Impact Assessments (EIA) and Operational Environmental Management Plans (OEMP) across its operations to proactively manage environmental risks. Key initiatives include air, water, and noise monitoring, and emission reduction strategies. Dedicated teams oversee implementation through internal and external audits, performance tracking via environmental KPIs, and quarterly compliance monitoring. Additionally, EMSTEEL has deployed digital ESG software to enhance sustainability data management and streamline reporting.	<ul style="list-style-type: none">Reduce GHG emissions by 40% in Steel BU and 30% in Cement BU by 2030, ensure 50% renewable energy use, and achieve ISO 14001 compliance.
	Systematic Social Management	Engaged	The company developed a Social Risk Management Procedure and grievance mechanisms allow employees and stakeholders to report concerns, while internal audits ensure policy compliance, employee wellbeing initiatives, and community engagement activities. Key focus areas include education, health, community development, and providing employment opportunities. To reinforce responsible labour practices, the Company have developed a social risk register, and made gap assessment against ISO 26000. EMSTEEL follows the ILO standards and UAE labour laws, ensuring fair treatment, diversity, and inclusion in its workforce. CSR policy was also established.	<ul style="list-style-type: none">CSR strategy to be developed and accelerate the implementation of ISO 26000 across all units as per plan. Enhance health & safety with a Lost Time Injury Frequency Rate (LTIFR) target of <0.1 by 2030, increase female representation to 10% in leadership roles, and boost Emiratisation to 60% by 2030.
	Systematic Economic Management	Proactive and learning	Financial internal and external audits, performance monitoring, and strategic planning. The company focuses on operational efficiency, market expansion, and responsible economic practices to align with global and national economic objectives.	<ul style="list-style-type: none">Embed ESG risks into financial planning and link executive incentives to ESG targets.

Sustainability Principles	Practices	Maturity	Characteristics of the approach to sustainability in developing organisation	Objectives & Plan(s) / Programme(s)
	Skills and training	Proactive and learning	EMSTEEL prioritises continuous employee development through learning platforms such as LinkedIn Learning, offering training programmes tailored to various job levels. The Learning Ladder Model supports leadership, middle management, and employees, combining instructor-led, blended, and online learning experiences. The Leaders Coaching Programme and GROW Programme enhance leadership, behavioural, and technical competencies, while international partnerships with Harvard, IMD, and London Business School ensure high-quality professional development.	<ul style="list-style-type: none">Provide 90-95 training hours per employee annually and ensure 100% participation in health & safety training.
	Career development	Proactive and learning	EMSTEEL fosters career growth through structured programmes like the Career Aspiration Programme (CAP), designed to upskill UAE Nationals and align career progression with business needs. The On-the-Job Training (OJT) Framework connects trainees with experienced professionals, ensuring competency development for various roles. Performance appraisals and Individual Development Plans (IDPs) are integrated into the Talent Development & Succession Planning system, ensuring a strategic approach to employee career advancement.	<ul style="list-style-type: none">Introducing ITQAN - The Mentoring Programme, a professional development initiative that connects employees with experienced mentors to support their growth, career aspirations, and success. Implement structured succession planning for 70% of employees and improve gender diversity in leadership
Transparency	Identify appropriate metrics/KPIs	Proactive and learning	EMSTEEL integrates ESG KPIs into its balanced scorecard, ESG policy maturity, Decarbonisation strategy covering GHG emissions, ESG assessment covering energy, water, board, responsible supply chain, Community, and other.	<ul style="list-style-type: none">Update the ESG policy to align with the newly developed KPIs based on ESG strategy promptly. Digital tracking solutions are being developed. Consider including other significant ESG metrics beyond emissions and selected KPIs in the steel business in 2025. Proceed with the planned verification for Emirates Cement data in 2026 and ensure timely execution and reporting. Establish ESG KPIs covering emissions, energy efficiency, diversity, and supply chain sustainability, with regular updates
	Monitor performance	Engaged	ESG performance is tracked through quarterly ESG reviews, and annual third-party audits, also presented in the ESG board and steering committees, to ensure compliance and continuous improvement.	<ul style="list-style-type: none">Expand external verification to cover all KPIs in the steel and cement BUs.
	Publicly report management practices and performance	Proactive and learning	EMSTEEL publishes annual sustainability reports, CDP disclosures, and ESG updates, following GRI, ADX, and TCFD standards, with third-party verification to enhance transparency, the assurance by third party covers wide range of KPIs.	<ul style="list-style-type: none">Develop formal process document (SOP) for developing the Sustainability Report. Expand the reporting period to include at least three to four years of performance data, to help in getting better ESG ratings, and align with GRI reporting principles and industry best practices, providing a more complete and transparent view of the company's ESG performance over time.
	Review performance	Proactive and learning	The performance is reviewed periodically by the ESG board and steering committees and ESG board committee. Performance benchmark against peers is also conducted annually, with best practices are listed and explored, the benchmark report shared by WSA is also studied and shared with management.	<ul style="list-style-type: none">Initiate consolidated review for the ESG performance that integrates key metrics and insights from relevant departments. Start exploring other rating options based on the best practices and peers' review. Ensure that the maturity assessments are presented and reviewed as part of the ESG board committee and ESG steering committee meetings.

Appendix E: Double Materiality Assessment

The following methodology is used for assessing material topics.

1. Identify Potential Material Topics

We identified 36 potential material topics based on:

Our ESG Strategy

EMSTEEL ESG Strategy considers the three pillars of sustainability: environment, society, and governance. A materiality assessment was conducted in 2024 to develop a robust strategy.

National and International Guidelines

We reviewed several guidelines including: ADX Standards (Abu Dhabi Securities Exchange), Global Reporting Initiative (GRI), European Sustainability Reporting Standards (ESRS), Certification Authority for Reinforcing Steel Sustainability Management System (CARES), United Nations Sustainable Development Goals (UN SDGs), World Steel Association (WSA), Responsible steel, Sustainability Accounting Standards Board (SASB), Morgan Stanley Capital International (MSCI).

2023 Material Topics

Please refer to 2023 Sustainability Report for the full list of 2023 Material Topics

Peers Benchmarking

Insights from sustainability reports and materiality assessments were carefully gathered from leading international and national producers in the steel and building materials industries.

2. Online Survey

Stakeholder engagement helps us to understand our stakeholders' perspectives, concerns, and expectations.

We conducted an online survey to engage 300+ global participants across various stakeholder groups. These groups included internal and external stakeholders as shown:

Voting on Key ESG Issues: The voting on the key ESG issues was conducted on a scale from 1 to 5 for 40 questions categorised as follows:

- 12 environmental questions
- 13 social questions
- 11 governance questions
- 4 demographic questions

3. Analysis & Validation

We used a structured approach to analyse survey responses, applying both qualitative and quantitative methods to ensure a robust and comprehensive evaluation. The data was categorised and analysed to identify patterns and trends in line with ESRS principles. Consequently, the severity and likelihood of the impact, as well as the magnitude and likelihood of the financial impact on our business, were used to determine the material topics.

We defined a set of impacts, risks and opportunities associated with each of the material topics. The results of our materiality assessment have been revised to reflect the validated input and strategic priorities established by our management team. The following concepts were used:

- **Positive Impact:** Refer to beneficial effects that an organisation's activities have on stakeholders, the environment, or society at large.
- **Negative Impact:** Denotes adverse effects caused by the organisation's operations, products, or decisions.
- **Risks:** Potential or actual events that could negatively affect the organisation's ability to create value for stakeholders, encompassing financial, operational, reputational, and strategic dimensions.
- **Opportunities:** Favourable circumstances or conditions that could positively impact the organisation's ability to create value for stakeholders, including avenues for innovation, growth, sustainability, and competitive advantage.

The analysis involved reviewing the list of potential material risks and opportunities,

applying a set of objective thresholds for likelihood and magnitude, and considering the nature of the effects of the identified risks and opportunities.

After considering both financial and impact materiality, the results of the DMA indicated full alignment with our ESG Strategy, and all the topics covered in the ESG Strategy were deemed "Material Topics". These topics are validated by our management in December 2024.

The following potential material topics are taken into our consideration throughout the Sustainability Report although they are not categorised as material topics for this year, as we are keeping an eye on emerging issues that could become significant in the future. This shows a forward-thinking approach to sustainability.

- Human Rights
- Socioeconomic Compliance
- Hazardous Substances
- Data Privacy (Cybersecurity)
- Gender Equality

Full List of 2024 Material Topics

- 1.GHG Emissions:
- 2.Energy Management
- 3.Health and Safety
- 4.Circular Economy and Waste
- 5.Business Integrity and Ethics
- 6.Customer Engagement
- 7.Human Capital Development
- 8.Water Consumption
- 9.Water Contamination
- 10.Corporate Governance
- 11.Responsible Supply Chain
- 12.Emiratisation
13. Economic Performance
- 14.Market Presence and Business Model Resilience
- 15.Resources Management
- 16.Diversity and Inclusion
- 17.Product Quality
- 18.Operational Efficiency
- 19.Emergency Preparedness
- 20.Air Emissions
- 21.Competitive Behaviour
- 22.Stable Production
- 23.ESG Related Transparency and Disclosures
- 24.Labour Management
- 25.Climate Change Adaptation
- 26.Opportunities in Clean Tech
- 27.Local Community (Community Investment)
- 28.Product Environmental Impact
- 29.ESG Governance/ Oversight
- 30.Biodiversity and Ecosystems
- 31.Working Conditions

Definitions of Double Materiality Topics

NO.	Material Topic	Definition
1.	GHG Emissions	The release of greenhouse gases into the atmosphere, contributing to global warming and climate change.
2.	Energy Management	The process of monitoring, controlling, and conserving energy in an organisation or facility.
3.	Health and Safety	Policies and procedures to ensure the physical and mental well-being of employees, preventing workplace injuries and illnesses.
4.	Circular Economy and Waste	An economic system aimed at eliminating waste and the continual use of resources through reuse, repair, refurbishment, and recycling.
5.	Business Integrity and Ethics	Adherence to moral and ethical principles in business practices, including honesty, fairness, and transparency.
6.	Customer Engagement	Interaction between a company and its customers to build relationships and foster loyalty.
7.	Human Capital Development	Improving employees' skills, knowledge, and abilities through training and development programmes.
8.	Water Consumption	The total volume of water used by an organisation for its operations.
9.	Water Contamination	The introduction of harmful substances into water bodies, making the water unsafe for consumption and damaging ecosystems.
10.	Corporate Governance	The system of rules, practices, and processes by which a company is directed and controlled, balancing the interests of stakeholders.
11.	Responsible Supply Chain	Managing supply chain operations considering ethical, social, and environmental impacts to ensure sustainability and fairness.
12.	Emiratisation	A policy initiative aimed at increasing the employment of UAE nationals in the private sector.
13.	Economic Performance	The financial health of an organisation, measured by indicators such as revenue, profit, and economic value generated.
14.	Market Presence and Business Model Resilience	The extent of an organisation's operations in various markets and its ability to adapt to changes and disruptions.
15.	Resources Management	The efficient and sustainable use of resources to minimise environmental impact and ensure long-term availability.
16.	Diversity, Equity, and Inclusion	Policies and practices that promote the representation and participation of different groups of people.
17.	Product Quality	The degree to which a product meets customer expectations and regulatory requirements.

NO.	Material Topic	Definition
18.	Operational Efficiency	The ability of an organisation to deliver products or services in the most cost-effective manner without compromising quality.
19.	Emergency Preparedness	Planning and preparation for potential emergencies to ensure a swift and effective response.
20.	Air Emissions	The release of pollutants into the air from various sources.
21.	Competitive Behaviour	Actions taken by a company to outperform its competitors.
22.	Stable Production	The consistent and reliable production of goods or services, ensuring minimal disruptions and maintaining quality standards.
23.	ESG Related Transparency and Disclosures	The practice of openly reporting on environmental, social, and governance (ESG) factors.
24.	Labour Management	The administration of employee relations, including hiring, training, performance management, and compliance with labour laws.
25.	Climate Change Adaptation	Adjusting practices, processes, and structures to mitigate the risks and impacts of climate change.
26.	Opportunities in Clean Tech	The potential for growth and innovation in technologies that reduce environmental impact.
27.	Local Community (Community Investment)	Contributions made by an organisation to the well-being and development of the local community.
28.	Product Environmental Impact	The effect that a product has on the environment throughout its lifecycle.
29.	ESG Governance/Oversights	Structures and processes in place to oversee and manage an organisation's environmental, social, and governance (ESG) responsibilities.
30.	Biodiversity and Ecosystems	The variety of life in a particular habitat or ecosystem and the interactions between different species and their environment.
31.	Working Conditions	The environment in which employees work, including factors such as safety, hours, remuneration, and workplace culture.

Appendix F: Global Reporting Initiative (GRI) Content Index

Statement of use	EMSTEEL has reported in accordance with the GRI Standards for the period from 1 January 2024 to 31 December 2024
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	NA

GRI Standard	Disclosure	Location/ Direct Response	Omission			GRI Sector Standard No.
			Requirement(s) Omitted	Reason	Explanation	
General Disclosures						
GRI 2: General Disclosures 2021	2-2 Entities included in the organisation's sustainability reporting	4				
	2-3 Reporting period, frequency and contact point	4-5				
	2-4 Restatements of information	N/A	2-4		No restatement of information in the report	
	2-5 External assurance	Appendix J				
	2-6 Activities, value chain and other business relationships	15-19				
	2-7 Employees	60-66				
	2-8 Workers who are not employees	61				
	2-9 Governance structure and composition	72-75				
	2-10 Nomination and selection of the highest governance body	N/A			This is covered in the Governance Report	
	2-11 Chair of the highest governance body	73				
	2-12 Role of the highest governance body in overseeing the management impacts	72-74				
	2-13 Delegation of responsibility for managing impacts	72-75				
	2-14 Role of the highest governance body in sustainability reporting	72-74				
	2-15 Conflicts of interest	76-77				
	2-16 Communication of critical concerns	76				
	2-17 Collective knowledge of the highest governance body	73				
	2-18 Evaluation of the performance of the highest governance body	75				

GRI Standard	Disclosure	Location/ Direct Response	Omission			GRI Sector Standard No.
			Requirement(s) Omitted	Reason	Explanation	
General Disclosures						
	2-19 Remuneration policies	62 & 74				
	2-20 Process to determine remuneration	62				
	2-21 Annual total compensation ratio	62				
	2-22 Statement on sustainable development strategy	6-7				
	2-23 Policy commitments	24-27				
	2-24 Embedding policy commitments	24-27				
	2-25 Processes to remediate negative impacts	32-33 & 50 - 51				
	2-26 Mechanisms for seeking advice and raising concerns	91 - 93				
	2-27 Compliance with laws and regulations	76				
	2-28 Membership associations	14				
	2-29 Approach to stakeholder engagement	Appendix C				
	2-30 Collective bargaining agreements	77				
Material Topics						
GRI 3: Material Topics 2021	3-1 Process to determine material topics	22 - 23				
	3-2 List of material topics	23				
Economic Performance						
GRI 3: Material Topics 2021	3-3 Management of material topics	78 - 79				
	201-1 Direct economic value generated and distributed	79				
	201-2 Financial implications and other risks and opportunities due to climate change	Appendix B				
	201-3 Defined benefit plan obligations and other retirement plans	61 - 62				
	201-4 Financial assistance received from government	75				
Market Presence						
GRI 3: Material Topics 2021	3-3 Management of material topics	78 - 79				
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	N/A	202-1		Not applicable	
	202-2 Proportion of senior management hired from the local community	37.5%				

GRI Standard	Disclosure	Location/ Direct Response	Omission			GRI Sector Standard No.
			Requirement(s) Omitted	Reason	Explanation	
General Disclosures						
Procurement Practices						
GRI 3: Material Topics 2021	3-3 Management of material topics	80 - 83				
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	82				
Anti-corruption						
GRI 3: Material Topics 2021	3-3 Management of material topics	76 - 77				
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	76				
	205-2 Communication and training about anti-corruption policies and procedures	76 - 77				
	205-3 Confirmed incidents of corruption and actions taken	77				
Materials						
GRI 3: Material Topics 2021	3-3 Management of material topics	45 - 46				
GRI 301: Materials 2016	301-1 Materials used by weight or volume	45 - 46				
	301-2 Recycled input materials used	45 - 46				
	301-3 Reclaimed products and their packaging materials	45 - 46				
Energy						
GRI 3: Material Topics 2021	3-3 Management of material topics	34 - 36				
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	35				
	302-2 Energy consumption outside of the organisation	N/A	302 - 2		Not Applicable	
	302-3 Energy intensity	35				
	302-4 Reduction of energy consumption	34 - 36				
	302-5 Reductions in energy requirements of products and services	34-36				
Water and Effluents						
GRI 3: Material Topics 2021	3-3 Management of material topics	47				
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	47 - 48				
	303-2 Management of water discharge-related impacts	47 - 48				
	303-3 Water withdrawal	48				
	303-4 Water discharge	48				
	303-5 Water consumption	48				
Biodiversity						
GRI 3: Material Topics 2021	3-3 Management of material topics	51				

GRI Standard	Disclosure	Location/ Direct Response	Omission			GRI Sector Standard No.
			Requirement(s) Omitted	Reason	Explanation	
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	51				
	304-2 Significant impacts of activities, products and services on biodiversity	51				
	304-3 Habitats protected or restored	51				
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	51				
Emissions						
GRI 3: Material Topics 2021	3-3 Management of material topics	36 & 42				
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	34 - 40				
	305-2 Energy indirect (Scope 2) GHG emissions	36 - 40				
	305-3 Other indirect (Scope 3) GHG emissions	36 - 40				
	305-4 GHG emissions intensity	36 - 40				
	305-5 Reduction of GHG emissions	36 - 40				
	305-6 Emissions of ozone-depleting substances (ODS)	42				
	305-7 Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions	42				
Waste						
GRI 3: Material Topics 2021	3-3 Management of material topics	43				
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	43 - 44				
	306-2 Management of significant waste-related impacts	43 - 45				
	306-3 Waste generated	43 - 45				
	306-4 Waste diverted from disposal	44				
	306-5 Waste directed to disposal	45				
Supplier Environmental Assessment						
GRI 3: Material Topics 2021	3-3 Management of material topics	81				
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	83				
	308-2 Negative environmental impacts in the supply chain and actions taken	83				
Employment						
GRI 3: Material Topics 2021	3-3 Management of material topics	60				
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	60 - 61				
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	62				
	401-3 Parental leave	62				

GRI Standard	Disclosure	Location/ Direct Response	Omission			GRI Sector Standard No.		
			Requirement(s) Omitted	Reason	Explanation			
Occupational Health and Safety								
GRI 3: Material Topics 2021	3-3 Management of material topics	54- 55						
	403-1 Occupational health and safety management system	54						
	403-2 Hazard identification, risk assessment and incident investigation	57 - 58						
	403-3 Occupational health services	59						
	403-4 Worker participation, consultation and communication on occupational health and safety	55 - 57						
	403-5 Worker training on occupational health and safety	55 - 57						
	403-6 Promotion of worker health	57 - 59						
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	54 - 59						
	403-8 Workers covered by an occupational health and safety management system	54						
	403-9 Work-related injuries	58						
	403-10 Work-related ill health	58						
GRI 403: Occupational Health and Safety 2018								
Training and Education								
GRI 3: Material Topics 2021	3-3 Management of material topics	64						
	404-1 Average hours of training per year per employee	64						
	404-2 Programmes for upgrading employee skills and transition assistance programmes	64 - 66						
	404-3 Percentage of employees receiving regular performance and career development reviews	100%						
	Diversity and Equal Opportunity							
	GRI 3: Material Topics 2021	3-3 Management of material topics	63					
		405-1 Diversity of governance bodies and employees	61 & 63					
		405-2 Ratio of basic salary and remuneration of women to men	62					
		GRI 405: Diversity and Equal Opportunity 2016						
		Non-discrimination						
		GRI 3: Material Topics 2021	3-3 Management of material topics	76 - 77				
406-1 Incidents of discrimination and corrective actions taken			77					
GRI 406: Non-discrimination 2016								
Child Labour								
GRI 3: Material Topics 2021			3-3 Management of material topics	77				
			408-1 Operations and suppliers at significant risks for incidents of child labour	82				
	GRI 408: Child Labour 2016							

GRI Standard	Disclosure	Location/ Direct Response	Omission			GRI Sector Standard No.
			Requirement(s) Omitted	Reason	Explanation	
Forced or Compulsory Labour						
GRI 3: Material Topics 2021	3-3 Management of material topics	77				
GRI 409: Forced or Compulsory Labour 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	82				
Local Communities						
GRI 3: Material Topics 2021	3-3 Management of material topics	68				
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	81 - 83				
	414-2 Negative social impacts in the supply chain and actions taken	68 - 69				
Supplier Social Assessment						
GRI 3: Material Topics 2021	3-3 Management of material topics	80				
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria					
	414-2 Negative social impacts in the supply chain and actions taken					
Public Policy						
GRI 3: Material Topics 2021	3-3 Management of material topics	75				
415-1 Political contributions	415-1 Political contributions	75				
Customer Health and Safety						
GRI 3: Material Topics 2021	3-3 Management of material topics	54				
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	57-58 & 50				
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	49				
Marketing and Labelling						
GRI 3: Material Topics 2021	3-3 Management of material topics	56				
GRI 417: Marketing and Labelling 2016	417-1 Requirements for product and service information and labelling	56				
	417-2 Incidents of non-compliance concerning product and service information and labelling	0				
	417-3 Incidents of non-compliance concerning marketing communications	0				
Customer Privacy						
GRI 3: Material Topics 2021	3-3 Management of material topics	95				
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	95				

GRI Standard	Disclosure	Location/ Direct Response	Omission			GRI Sector Standard No.
			Requirement(s) Omitted	Reason	Explanation	
Indirect Economic Impacts						
GRI 3: Material Topics 2021	3-3 Management of material topics	N/A	It is not a material topic			
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	68				
	203-2 Significant indirect economic impacts	67-68				
Anti-competitive Behaviour						
GRI 3: Material Topics 2021	3-3 Management of material topics	76 –77				
GRI 206: Anti-competitive Behaviour 2016	206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	76 –77				
Tax						
GRI 3: Material Topics 2021	3-3 Management of material topics	N/A	It is not a material topic			
GRI 207: Tax 2019	207-1 Approach to tax	EMSTEEL is dedicated to transparency and responsibility in its tax practices. We strictly follow all the applicable regulations in this regard.				
	207-2 Tax governance, control, and risk management	The Board of Directors (BoD), entrusted by the shareholders, oversees the different affairs of EMSTEEL Group. We also have the following Committees: Audit Committee & Strategic Investment and Risk Committee.				
	207-3 Stakeholder engagement and management of concerns related to tax	We engage with stakeholders, including tax authorities, to ensure transparency and address any concerns related to our tax practices.				
	207-4 Country-by-country reporting	N/A	207-4	N/A	The operations of EMSTEEL are limited to UAE.	

GRI Standard	Disclosure	Location/ Direct Response	Omission			GRI Sector Standard No.
			Requirement(s) Omitted	Reason	Explanation	
Labour/Management Relations						
GRI 3: Material Topics 2021	3-3 Management of material topics	66	Partially 402-1	Some information is not available.		
GRI 402: Labour/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	66				
Freedom of Association and Collective Bargaining						
GRI 3: Material Topics 2021	3-3 Management of material topics	77				
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	77				
Security Practices						
GRI 3: Material Topics 2021	3-3 Management of material topics	N/A	3-3	It is not applicable to EMSTEEL operations.		
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	N/A	410-1	It is not applicable to EMSTEEL operations.		
Rights of Indigenous Peoples						
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	N/A	411-1	United Arab Emirates (UAE) does not have recognised indigenous peoples. As such, it is not applicable to EMSTEEL operations.		

Appendix G: Abu Dhabi Securities Exchange (ADX) Content Index

Category	Metric	Calculation	Page Number (s) and/or Direct Answer
Environment	E1. GHG Emissions	E1.1 Total amount, in CO ₂ equivalents, for Scope 1	37, 38, 40
		E1.2 Total amount, in CO ₂ equivalents, for Scope 2	37, 38, 40
		E1.3 Total amount, in CO ₂ equivalents, for Scope 3	37, 38, 40
	E2. Emissions Intensity	E2.1 Total GHG emissions for output scaling factor	37, 38, 40
		E2.2 Total non-GHG emissions per output scaling factor	42
	E3. Energy Usage	E3.1 Total amount of energy directly consumed	35
		E3.2 Total amount of energy indirectly consumed	35
	E4. Energy Intensity	Total direct energy usage per output scaling factor	35
	E5. Energy Mix	Percentage: Energy usage by generation type	35
	E6. Water Usage	E6.1 Total amount of water consumed	48
		E6.2 Total amount of water reclaimed	48
	E7. Environmental Operations	E7.1 Does your company follow a formal Environmental Policy?	Yes
		E7.2 Does your company follow specific waste, water, energy and/or recycling policies?	Yes
		E7.3 Does your company use a recognised energy management system?	Yes
	E8. Environmental Oversight	Does your Management Team oversee and/or manage sustainability issues?	Yes
	E9. Environmental Oversight	Does your Board oversee and/or manage sustainability issues?	Yes
	E10. Climate Risk Mitigation	Total amount invested, annually, in climate-related infrastructure, resilience and product development	1,799,690 AED
Social	S1. CEO Pay Ratio	S1.1 Ratio: CEO total compensation to median Full Time Equivalent (FTE) total compensation	61
		S1.2 Does your company report this metric in regulatory filings?	Yes
	S2. Gender Pay Ratio	Ratio: Median male compensation to median female compensation	62
	S3. Employee Turnover	S3.1 Percentage: Year-over-year change for full-time employees	61
		S3.2 Percentage: Year-over-year change for part-time employees	61
		S3.3 Percentage: Year-over-year change for contractors/consultants	NA
	S4. Gender Diversity	S4.1 Percentage: Total enterprise headcount held by men and women	60
		S4.2 Percentage: Entry- and mid-level positions held by men and women	NA
		S4.3 Percentage: Senior- and executive-level positions held by men and women	NA
	S5. Temporary Worker Ratio	S5.1 Percentage: Total enterprise headcount held by part-time employees	NA
		S5.2 Percentage: Total enterprise headcount held by contractors and/or consultants	61
	S6. Non-discrimination	Does your company follow non-discrimination policy?	Yes

Category	Metric	Calculation	Page Number (s) and/or Direct Answer
	S7. Injury Rate	Percentage: Frequency of injury events relative to total workforce time	58
	S8. Global Health and Safety	Does your company follow an occupational health and/or global health and safety policy?	Yes
	S9. Child and Forced Labour	S9.1 Does your company follow a child and/or forced labour policy?	Yes
		S9.2 If yes, does your child and/or forced labour policy also cover suppliers and vendors?	Yes
	S10. Human Rights	S10.1 Does your company follow a human rights policy?	Yes
		S10.2 If yes, does your human rights policy also cover suppliers and vendors?	Yes
	S11. Nationalisation	Percentage of national employees	67
	S12. Community Investment	Amount invested in the community as a percentage of company revenues	69
Governance	G1. Board Diversity	G1.1 Percentage: Total board seats occupied by men and women	Men: 71.4% Women: 28.6%
		G1.2 Percentage: Committee chairs occupied by men and women	Men: 100%
	G2. Board Independence	G2.1 Does your company prohibit CEO from serving as board chair? Yes/No	Yes
		G2.2 Percentage: Total board seats occupied by independent board members	86%
	G3. Incentivised Pay	Are executives formally incentivised to perform on sustainability?	75
	G4. Supplier Code of Conduct	G4.1 Are your vendors or suppliers required to follow a Code of Conduct?	Yes, it is part of the registration process
		G4.2 If yes, what percentage of your suppliers have formally certified their compliance with the code?	100%
	G5. Ethics and Prevention of Corruption	G5.1 Does your company follow an Ethics and/or Prevention of Corruption policy?	Yes
		G5.2 If yes, what percentage of your workforce has formally certified its compliance with the policy?	100%
	G6. Data Privacy	G6.1 Does your company follow a Data Privacy policy?	Yes
		G6.2 Has your company taken steps to comply with GDPR rules?	No, we are not required to comply with GDPR rules in the UAE.
	G7. Sustainability Reporting	Does your company publish a sustainability report?	Yes
	G8. Disclosure Practices	G8.1 Does your company provide sustainability data to sustainability reporting frameworks?	Yes
		G8.2 Does your company focus on specific UN SDGs?	Yes
		G8.3 Does your company set targets and report progress on the UN SDGs?	Yes
	G9. External Assurance	Are your sustainability disclosures assured or verified by a third-party audit firm?	Yes, refer to Appendix J: Independent Limited Assurance Statement.

Appendix H: Task Force on Climate-Related Financial Disclosures (TCFD) Index

TCFD Recommendations	Page Number (s) and/or Direct Answer
Governance	
a. Describe the board's oversight of climate-related risks and opportunities.	72, 73, 74, 75
b. Describe management's role in assessing and managing climate-related risks and opportunities.	72, 73, 74, 75
Strategy	
a. Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term.	24, 25, 26, 27, 28, 102, 103
b. Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.	24, 25, 26, 27, 28, 102, 103
c. Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	102, 103
Risk Management	
a. Describe the organisation's processes for identifying and assessing climate-related risks.	102, 103
b. Describe the organisation's processes for managing climate-related risks.	24, 25, 26, 27, 28, 102, 103
c. Describe how processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.	24, 25, 26, 27, 28, 102, 103
Metrics and Targets	
a. Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	37, 38, 40
b. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks.	37, 38, 40
c. Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	37, 38, 40

Appendix I: IFRS S2 Index

Topic	Metric	Category	Unit of Measure	Code	Page Number
Sustainability Disclosure Topics & Metrics					
Greenhouse Gas Emissions	Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations	Quantitative	Metric tons (t) CO ₂ -e, Percentage (%)	EM-IS-110a.1	38, 40
	Discussion of long- and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	Discussion and Analysis	n/a	EM-IS-110a.2	26,27,28
Energy Management	(1) Total energy consumed (2) percentage grid electricity and (3) percentage renewable	Quantitative	Gigajoules (GJ), Percentage (%)	EM-IS-130a.1	35
	(1) Total fuel consumed, (2) percentage coal, (3) percentage natural gas and (4) percentage renewable	Quantitative	Gigajoules (GJ), Percentage (%)	EM-IS-130a.2	1 – Please refer to page 35 2 – Zero 3- 54, 953, 625 GJ 4- Please refer to page 35
Water Management	(1) Total water withdrawn, (2) total water consumed; percentage of each in regions with High or Extremely High Baseline Water Stress	Quantitative	Thousand cubic meters (m ³), Percentage (%)	EM-IS-140a.1	48
Supply Chain Management	Discussion of the process for managing iron ore or coking coal sourcing risks arising from environmental and social issues	Discussion and Analysis	n/a	EM-IS-430a.1	80,81,82,83
Activity Metric					
	Raw steel production, percentage from: (1) basic oxygen furnace processes, (2) electric arc furnace processes	Quantitative	Metric tons (t), Percentage (%)	EM-IS-000.A	please refer to page 84 (1) & (2) will be considered in the future reporting cycle, if feasible.
	Total iron ore production	Quantitative	Metric tons (t)	EM-IS-000.B	84
	Total coking coal production	Quantitative	Metric tons (t)	EM-IS-000.C	84

Appendix J: Independent Limited Assurance Statement



INDEPENDENT ASSURANCE STATEMENT

1 INTRODUCTION

DNV Business Assurance Group AS - Dubai Branch ('DNV'), has been commissioned by EMSTEEL Building Materials PJSC, (hereafter referred to as 'EMSTEEL' or 'the Company') to undertake an independent assurance of the company's ESG/non-financial disclosures in its ESG Report (hereafter referred as 'Report') for the period 1st Jan to 31st Dec 2024.

The disclosures have been prepared by EMSTEEL in line with and considering the following standards and frameworks.:

- "in accordance" to requirements of Global Reporting Initiative (GRI) sustainability reporting standards 2021.
- CARES – Sustainable Constructional Steels Scheme (for steel business only)
- ADX – ABU DHABI Securities Exchange ESG Disclosure Guidance
- Greenhouse Gas Protocol: *A Corporate Accounting and Reporting Standard, and*
- ISO 14064-1:2018 - *Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals.*

DNV has carried out the assurance engagement in accordance with DNV's VeriSustain™¹ protocol, V6.0, which is based on our professional experience and international assurance practice, and the international standard in Assurance Engagements, ISAE 3000 (revised)-*Assurance Engagements other than Audits*. DNV's VeriSustain™ protocol has been developed in accordance with the most widely accepted reporting and assurance standards. Apart from DNV's VeriSustain™ protocol, DNV team has also followed the ISO 14064-3 – *'Specification with guidance for the verification and validation of greenhouse gas statements' standard*.

The intended user of this assurance statement is the Management of EMSTEEL Building Materials PJSC.

Responsibilities of the Management of EMSTEEL and of the Assurance Provider

The Management of EMSTEEL has the sole responsibility for the preparation of the Report and is responsible for all information disclosed in the report. The company is responsible for maintaining processes and procedures for collecting, analyzing and reporting the information and also ensuring the quality and consistency of the information presented in the report. EMSTEEL is also responsible for ensuring the maintenance and integrity of its website and any referenced disclosures on their website.

In performing this assurance assessment, DNV's responsibility is to the management of the company. This statement represents our independent opinion and is intended to inform the outcome of the assurance to the stakeholders of the company.

¹ The VeriSustain™ protocol is based on the principles of various assurance standards including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised (Assurance Engagements other than Audits or Reviews of Historical Financial Information) and the GRI Principles for Defining Report Content and Quality, international best practices in verification and our professional experience; and is available on request from www.dnv.com



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Scope, Boundary and Limitations

The agreed scope of work included a Limited level of assurance for the information on non-financial performance which were disclosed in the Report prepared by EMSTEEL (based on GRI, ADX, and CARES) for the identified material topics (Annex I) for the activities undertaken by the company during the reporting period 01st Jan to 31st Dec 2024. The reported topic boundaries of non-financial performance are based on the internal and external materiality assessment covering EMSTEEL's operations as brought out in the section 'Reporting boundary and period' of the report.

The boundary for the assignment covers the performance of EMSTEEL UAE operations that fall under the direct operational control of the company's Legal structure unless otherwise specified in the 'Reporting boundary and period' of the report.

The boundary for the assignment covers the performance of Emirates Steel in the UAE for all KPIs, except for GRI 202, 205, 401, 404, 405, and 406 which were assessed at the group level (including Emirates Steel, Al Ain Cement Factory, Anabeeb PVC LLC, Anabeeb GRP LLC, and Emirates Blocks Factory). These operations fall under the company's direct operational control within its legal structure unless otherwise specified in the 'Reporting Boundary and Period' section of the report.

Inherent Limitation(s):

DNV's assurance engagements are based on the assumption that the data and information provided by the EMSTEEL to us as part of our review have been provided in good faith, are true, and is free from material misstatements. Because of the selected nature (sampling) and other inherent limitation of both procedures and systems of internal control, there remains the unavoidable risk that errors or irregularities, possibly significant, may not have been detected.

The assurance scope has the following limitations:

- The assurance engagement considers an uncertainty of ±5% based on materiality threshold for estimation/measurement errors and omissions.
- DNV has not been involved in evaluation or assessment of any financial data/performance of the company. DNV opinion on financial disclosures relies on the third party audited financial reports of the company. DNV does not take any responsibility of the financial data reported in the audited financial reports of the company.
- Data outside the operations specified in the assurance boundary is excluded from the assurance process, unless explicitly mentioned otherwise in this statement.
- The assurance does not cover EMSTEELS's statements that express opinions, claims, beliefs, aspirations, expectations, aims, or future intentions. Additionally, assertions related to Intellectual property rights and other competitive issues are beyond the scope of this assurance.
- The assessment does not include a review of the company's strategy, or other related linkages expressed in the report. These aspects are not within the scope of the assurance engagement.



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- The assurance does not extend to mapping the report with reporting frameworks other than those specifically mentioned. Any assessments or comparisons with frameworks beyond the specified ones are not considered in this engagement.
- Aspects of the report that fall outside the mentioned scope and boundary are not subject to assurance. The assessment is limited to the defined parameters.
- The assurance engagement does not include a review of legal compliances. Compliance to legal requirements is not within the scope of this assurance. DNV expressly disclaims any liability or co-responsibility for any decision a person or an entity may make based on this Independent Assurance Statement.

Assurance process

As part of the assurance process, a multi-disciplinary team of assurance specialists performed assurance work for selected sites of EMSTEEL (Annex II). We adopted a risk-based approach, that is, we concentrated our assurance efforts on the issues of high material relevance to the company's business and its key stakeholders. We carried out the following activities:

1. Reviewed the disclosures in the report. Our focus included general disclosures, management processes, principle wise performance (essential indicators and leadership indicators) and any other key metrics specified under the reporting framework.
2. Understanding the key systems, processes and controls for collecting, managing and reporting the non-financial disclosures in report.
3. Walk-through of key data sets. Understand and test, on a sample basis, the processes used to adhere to and evaluate adherence to the reporting principles.
4. Collect and evaluate documentary evidence and management representations supporting adherence to the reporting principles.
5. Interviews with the senior managers responsible for management of disclosures. We were free to choose interviewees and interviewed those with overall responsibility of monitoring, data collation and reporting the selected GRI, CARES, and ADX.
6. DNV audit team conducted on-site audits for corporate offices and sites (as mentioned in Annex II). Sample based assessment of site-specific data disclosures was carried out. We were free to choose sites for conducting our assessment.
7. Reviewed the process of reporting as defined in the assessment criteria standards.

Conclusion

Limited Level of Assurance

On the basis of the limited level of assurance assessment undertaken, for GRI, CARES, and ADX (Annexure I), nothing has come to our attention to suggest that the disclosures are not fairly stated and are not prepared in all material aspects, in accordance with the following principles.

1. Materiality

The process of determining the issues that are most relevant to an organization and its stakeholders.

The Report explains the materiality assessment process carried out by the company which has considered concerns of internal and external stakeholders, inputs from peers and the industry,



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as well as issues of relevance in terms of impact for EMSTEEL's business. The list of identified topics have been prioritized, reviewed and validated, and the company has indicated that they have conducted a fresh double materiality in this reporting period. The assessment has identified 12 material topics for EMSTEEL, divided among the strategic pillars of Environment (GHG emissions, Energy management), Social (Health & Safety, Human Capital Development), and Governance (Business Integrity, Ethics, and Corporate Governance). The top two topics in each category have been highlighted.

Nothing has come to our attention to suggest that the report does not meet the requirements related to the principle of materiality.

2. Responsiveness

The extent to which an organization responds to stakeholder issues.

The Report adequately brings out the company's policies, strategies, management systems and governance mechanisms in place to respond to topics identified as material and significant concerns of key stakeholder groups. Nothing has come to our attention to suggest that the Report does not meet the requirements related to the principle of responsiveness.

Nothing has come to our attention to believe that the report does not meet the requirements related to the principle of responsiveness.

3. Reliability/Accuracy

The accuracy and comparability of information presented in the report, as well as the quality of underlying data management systems.

The Report brings out the systems and processes that the company has set in place to capture and report its performance related to identified material topics across its reporting boundary. The majority of information mapped with data verified through our assessments with EMSTEEL's management teams and process owners at the corporate office and sampled sites within the boundary of the report were found to be fairly accurate and reliable. Some of the data inaccuracies identified in the report during the verification process were found to be attributable to transcription, interpretation, and aggregation errors. These data inaccuracies have been communicated for correction and the related disclosures were reviewed post correction.

Nothing has come to our attention to believe that the report does not meet the principle of reliability and accuracy.

4. Completeness

How much of all the information that has been identified as material to the organization and its stakeholders is reported?

The Report brings out the company's performance, strategies and approaches related to the environmental, social and governance issues that it has identified as material for its operational locations coming under the boundary of the report, for the chosen reporting period while applying and considering the requirements of principle of completeness.

Nothing has come to our attention to suggest that the Report does not meet the principle of completeness with respect to scope, boundary and time.

5. Neutrality/Balance

The extent to which a report provides a balanced account of an organization's performance, delivered in a neutral tone.



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The report brings out the disclosures related to EMSTEEL’s performance during the reporting period in a neutral tone in terms of content and presentation, while considering the overall macroeconomic and industry environment.

Nothing has come to our attention to suggest that the report does not meet the requirements related to the principle of neutrality.

Statement of Competence and Independence

DNV applies its own management standards and compliance policies for quality control, which are based on the principles enclosed within ISO IEC 17029:2019 – *Conformity assessment – General principles are requirements for validation and verification bodies* and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

We have complied with the DNV Code of Conduct² during the assurance engagement. DNV’s established policies and procedures are designed to ensure that DNV, its personnel and, where applicable, others are subject to independence requirements (including personnel of other entities of DNV) and maintain independence where required by relevant ethical requirements. This engagement work was carried out by an independent team of sustainability assurance professionals. DNV was not involved in the preparation of any statements or data included in the Report except for this Assurance Statement for internal use of EMSTEEL Building Materials PJSC.

For DNV Business Assurance Group AS - Dubai Branch

Lele, Sandeep <small>Digitally signed by Lele, Sandeep Date: 2025.03.18 11:41:20 +04'00'</small>	Kakaraparthi Venkata Raman <small>Digitally signed by Kakaraparthi Venkata Raman Date: 2025.03.18 14:19:21 +05'30'</small>
Sandeep lele Lead Verifier, DNV Business Assurance Group AS - Dubai Branch	Kakaraparthi Venkata Raman Assurance Reviewer, DNV Business Assurance India Private Limited, India
Vikas Bankar (Verifier) Mayank Kumar (Verifier) Sauvik Banerjee (Verifier)	

18/03/2025, Dubai, United Arab Emirates.

DNV Business Assurance Group AS - Dubai Branch is part of DNV – Business Assurance, a global provider of certification, verification, assessment and training services, helping customers to build sustainable business performance. www.dnv.com

² DNV Corporate Governance & Code of Conduct - <https://www.dnv.com/about/in-brief/corporate-governance.html>



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Annex I

GRI disclosures assured for Limited level as a part of assessment:

- GRI 202-2 Proportion of senior management hired from the local community – 202-2 (a).
- GRI 205-1 Operations assessed for risks related to corruption – 205-2 (a), (b), 205-3
- GRI 302: Energy 2016 – 302-1 (a), (c), (d), (e), 302-3 (a), (b), (c), 302-4 (a), 302-5 (a)
- GRI 303: Water and Effluents 2018 – 303-1, 303-2, 303-3 (a) (c), 303-4 (a) (c), 303-5 (a).
- GRI 305: Emissions 2016 – 305-1 (a), 305-2 (a), (b); 305-3(a), 305-4 (a), 305-5 (a)
- GRI 306: Waste 2020 – 306-3; 306-4 (a), (b), (c); 306-5 (c),
- GRI 308: Supplier Environmental Assessment 2016 – 308-1, 308-2 (a), (b), (c)
- GRI 401-1 New employee hires and employee turnover – 401-1, 401-2, 403-3 (a), (b), (c)
- GRI 403: Occupational Health and Safety 2018 - 403-1, 403-2, 403-3. 403-4, 403-5, 403-6, 403-7, 403-9 (a (ii, iii, iv, v)), 403-9 (b (ii, iii, iv, v)), 403-9 (e), 403-10
- GRI 404 Average hours of training per year per employee – 404-1, 404-2, 404-3.
- GRI 405 Diversity of governance bodies and employees – 405-1.
- GRI 406 Incidents of discrimination and corrective actions taken – 406-1(a)
- GRI 408 Operations and suppliers at significant risk for incidents of child labor – 408-1(a)
- GRI 409 Operations and suppliers at significant risk for incidents of forced or compulsory labor – 409-1(a).
- GRI 414 New suppliers that were screened using social criteria – 414-1, 414-2 (a), (b)
- GRI 415 Political contributions - 415-1 (a)

ADX disclosures assured for Limited level as a part of assessment:

- E1. GHG Emissions
 - E1.1 Total amount, in CO₂ equivalents, for Scope 1
 - E1.2 Total amount, in CO₂ equivalents, for Scope 2
 - E1.3 Total amount, in CO₂ equivalents, for Scope 3
- E2 Emissions Intensity
 - E2.1 Total GHG emissions for output scaling factor
- E3. Energy Usage
 - E3.1 Total amount of energy directly consumed
 - E3.2 Total amount of energy indirectly consumed
- E4 Energy Intensity: Total direct energy usage per output scaling factor
- E5 Energy Mix: Percentage: Energy usage by Generation type
- E6. Water Usage
 - E6.1 Total amount of water consumed
- E7 Environmental Operations
 - E7.1 Does your company follow a formal Environmental Policy? Yes
 - E7.2 Does your company follow specific waste, water, energy and/or recycling policies? Yes
 - E7.3 Does your company use a recognized energy management system? Yes
- E8 Environmental Oversight: Does management team oversee and/or manage sustainability issues? Yes
- E9 Environmental Oversight: Does your Board oversee and/or manage sustainability issues? Yes



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- E10 Climate Risk Mitigation
- S1. CEO Pay Ratio
 - S1.1 Ratio: CEO total compensation to median Full Time Equivalent (FTE) total compensation. Ratio
 - S1.2 Does your company report this metric in regulatory filings? Yes
- S2 Gender Pay Ratio: Median male compensation to median female compensation
- S3 Employee Turnover
 - S3.1 Percentage: year -over-year change for the full-time employees
- S4 Gender Diversity
 - S4.1 Percentage: Total enterprise headcount held by men and women
 - S4.2 Percentage: Entry- and mid-level positions held by men and women
 - S4.3 Percentage: Senior- and executive-level positions held by men and women
- S5 Temporary worker ratio
 - S5.1 Percentage: Total enterprise headcount held by part-time employees
- S6 Non-discrimination: Does your company follow non-discrimination policy? Yes
- S7 Injury Rate: Percentage: Frequency of injury events relative to total workforce time.
- S8 Global Health and Safety: Does your company follow an occupational health and/or global health and safety policy? Yes
- S9. Child and Forced Labour
 - S9.1 Does your company follow a child and/or forced labor policy? Yes
 - S9.2 If yes, does your child and/or forced labor policy also cover suppliers and vendors? Yes
- S10. Human Rights
 - S10.1 Does your company follow a human rights policy? Yes
 - S10.2 If yes, does your human rights policy also cover suppliers and vendors? Yes
- S11. Nationalisation: Percentage of national employees
- G1. Board Diversity
 - G1.1 Percentage: Total board seats occupied by men and women
 - G1.2 Percentage: Committee chairs occupied by men and women
- G2. Board Independence
 - G2.1 Does your company prohibit CEO from serving as board chair? Yes
 - G2.2 Percentage: Total board seats occupied by independent board members
- G4. Supplier Code of Conduct
 - G4.1 Are your vendors or suppliers required to follow a Code of Conduct? Yes
 - G4.2 If yes, what percentage of your suppliers have formally certified their compliance with the code?
- G5. Ethics and Prevention of Corruption
 - G5.1 Does your company follow an Ethics and/or Prevention of Corruption policy? Yes
 - G5.2 If yes, what percentage of your workforce has formally certified its compliance with the policy?
- G6. Data Privacy
- G7. Sustainability Reporting
- G8 Disclosure Practices
- G9 External Assurance



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CARES disclosures (for steel business only) assured for Limited level as a part of assessment:

3.3.1	Total energy including: fuel, electricity, heating, cooling, steam or all other energy sources	55,734	TJ
3.3.1	Energy Intensity	17.13	(GJ/tonnes of crude steel)
3.3.2	Total renewable energy produced directly on site, or purchased as certified renewable energy and/or contribution of renewable energy purchased from national grid.	2,105,686	MWH
3.3.2	Renewable energy as a proportion of total energy used	86	% of electricity use
3.3.4	Total volume of water consumed including: Surface water from wetlands, rivers, lakes, sea and oceans; Ground water; Rainwater collected; Municipal water supplies (Potable water)	6,809.6	Thousand M³ of RO treated seawater and municipal water supply for Emirates Steel
3.3.4	Total quantity of billet or bloom or slab produced (Good product) and/or finished product. (Total quantity of finished product produced plus total quantity of semi-product produced but not rolled)	3.1	Million tonnes
3.3.4	Water Use	2.73	m³/tonne of crude steel
3.5.1	Global warming potential (GWP) Emirates Steel EPD for Heavy Section and sheet Piles	0.706	tCO₂/tonne
4.1.9	Percentage split in gender of total workforce expressed as %Male/%Female	F = 4% M = 96%	%
4.2.1	Total number of lost time injuries of employees and permanent contractors (if any) during the data collection/reporting period - LTI	Employee LTI: 1 Contractors LTI: 2	Nos
4.2.1	Total number of work hours of employees and permanent contractors (if any) during the data collection/reporting period - WH	Employee: 5,600,010 Contractors: 14,000,025	Hours
4.2.1	LTIFR	Employee LTI: 0.18 Contractors LTI: 0.14	Nos.
4.4.2	Total community initiative expenditure (funding) in the data collection/reporting period.	606	K AED
4.4.2	Community Initiative Rate (AED/Tonne of crude steel)	0.19	(AED/Tonne of crude steel)
4.4.2	Community Initiative Rate - Increase/Decrease	Increased	
4.4.2	Total number of hours of employee volunteering in local community in the data collection / reporting period.	1,448	hours
4.3.5	Total number of training hours provided by the organisation in the reporting period to its employees and permanent contractors (if any) in the data collection/reporting period.	335582	Hours



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4.3.5	Total average number of employees and permanent contractors (if any) employed at all sites during the data collection/reporting period.	2,505	Nos.
4.3.5	Number of training hours per employee-contractor	133	Hours
4.3.7	Total number of Apprentices employed in reporting year	0	Nos
4.3.7	Total number of Graduate trainees employed in reporting year	110	Nos
4.3.8	Total number of long-term unemployed people on training programme, with a view to employment, in the reporting year	2	Nos
4.3.8	Total number of jobs (FTE) in place for people with disabilities in the reporting year	1	Nos
4.1.12	Total number of grievances about social impacts (e.g. Human Rights, Worker's Conditions, Fair Labour Condition etc) resolved through formal grievance system at all sites during the data collection/reporting period.	0	Nos
4.1.12	Total number of grievances about social impacts (e.g. Human Rights, Worker's Conditions, Fair Labour Conditions...etc) filed through formal grievance system at all sites during the data collection/reporting period.	0	Nos
4.1.12	Grievance Resolution Rate		NA
2.10.3	Total mass of raw materials purchased	4,981,746	Tonne
2.10.3	Total mass of raw materials supplied from suppliers which have been evaluated for sustainability impacts	3,872,991	Tonne
2.10.3	Supplier sustainability impact evaluation by mass percentage	77.74	%
2.9.5	Total number of ethical, environmental, social and economic incidents recorded and reported to an external Regulator in the data collection/reporting period.	1	Nos
2.9.5	Total number of ethical, environmental, social and economic incidents that resulted in the issuance of enforcement and/or prohibition notices by an external Regulator in the data collection/reporting period.	0	Nos
2.9.5	Total number of ethical, environmental, social and economic incidents that resulted in a successful prosecution by an external Regulator in the data collection/reporting period.	0	Nos

Annex II
Sites selected for On-site audits

S.no	Site	Location
1.	Corporate office	PO Box: 9022, Abu Dhabi Industrial City (ICAD), Musaffah, Abu Dhabi, UAE
2.	Steel Manufacturing Facility	PO Box: 9022, Abu Dhabi Industrial City (ICAD), Musaffah, Abu Dhabi, UAE

Appendix K: Links to Additional Resources

Group ESG Policy

<https://www.emsteel.com/emsteel-esg-policy/>

Corporate Social Responsibility(CSR) Policy

<https://www.emsteel.com/corporate-social-responsibility/>

Integrated Management System (IMS) Policy

https://emsteel.com/pdf/2025/01/EMSTEEL-POLICY_REV-9-30-01-2025.pdf

Quality Assurance Page

<https://www.emsteel.com/es-quality-assurance/>

Code of Conduct

<https://www.emsteel.com/code-of-conduct/>

Whistleblowing Policy

https://www.emsteel.com/wp-content/uploads/2022/06/Whistleblowing-Policy_2022.pdf

Violation Reporting

<https://emsteel.ipm.ae.starcompliance.com/#landing>

Supplier Code of Conduct

<https://www.emsteel.com/pdf/2025/01/EMSTEEL-Supplier-COC-Jan-2025.pdf>

Supply Chain Management Policy

https://www.emsteel.com/wp-content/uploads/2024/01/SCD-GR-PC-001-Supply-Chain-Management-Policy_Approved.pdf

Investor Relations Page

<https://www.emsteel.com/investor-relations/>

Sustainability Page

<https://www.emsteel.com/sustainability-new/>





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