

2020 SUSTAINABILITY REPORT

Shaping the
Future of Trade



**MADE
FOR
TRADE**

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ABOUT THIS REPORT

We –DMCC (Dubai Multi Commodities Centre) – have published this report to help our stakeholders gain an understanding of our sustainability strategy and its performance in the year 2020.

The report also presents DMCC's priority topics, risks and opportunities related to environmental, social, and economic aspects relevant to our business and how we manage them.

As we seek to strengthen our leadership in creating the fastest growing and largest free economic zone in the United Arab Emirates and a hub for global commodities trade, we hope our sustainability strategy and performance sets an example for all our stakeholders.

REPORTING PRINCIPLES

DMCC's sustainability report applies the Global Reporting Initiative (GRI) Standards, including, reporting principles such as stakeholder inclusiveness, materiality, completeness, and accuracy. This report has been prepared in accordance with the GRI Standards: Core option and is available on the GRI online disclosure database and DMCC's website.

We are a UN Global Compact (UNGC) signatory since August 2017. This report serves as DMCC's Communication on Progress (CoP), according to UN Global Compact Advanced Level criteria, and is also available on the UN Global Compact website.

DMCC is also a signatory of the UN Women Empowerment Principles (WEPs) and remains committed to Sustainable Development Goal 5 on gender equality. Beyond the Sustainable Development Goal 5, our sustainability framework is designed to make progress on multiple Sustainable Development Goals (SDGs). DMCC's alignment to the SDGs can be viewed in the SDG index (page 26). The GRI content index can be found on www.dmcc.ae/sustainability.

STRUCTURE AND MATERIALITY

The report's structure reflects our sustainability strategy and how we implement and manage it in the context of our day-to-day business activities.

Each section of the report covers material topics under the umbrella of our three sustainability pillars:

- Sustainable City
- Operational Excellence
- Responsible Ecosystem

On page 19 we set out our materiality matrix, which puts the three pillars into context against the identified material topics. We have applied the materiality principle to the 24 material topics within the matrix. These topics have been defined in the report and supported with relevant disclosures. Each of the material topics under these pillars is supported by comprehensive data, which, in most cases, shows trends from the last two-three years. Some material topics do not have associated GRI disclosures but the content on the material topic has been included in the report.

SCOPE AND BOUNDARIES

The report reflects our environmental, social, and economic performance in the last financial year, which is set to the calendar year – 1 January 2020 to 31 December 2020. The scope of the report covers all our business activities, i.e., our trading activities, our free zone, and the Master Community we manage in Dubai.

The boundaries that we have used to assess our impact and to gather data for our material topics are those areas in which we have direct control. We define direct control as follows:

Direct control - This includes entities and stakeholders which DMCC has administrative authority over, such as its permanent employees, owned and leased property, its assets and infrastructure, free zone regulatory oversight, and the Master Community, which includes all of Jumeirah Lakes Towers District, Uptown Dubai District, the Jewelry and Gemplex District, One JLT, and other areas in line with DMCC Master Community Declaration and Master Plan. In addition, we reference activities and services that are offered to member companies, retailers, developers and residents of the Master Community.

ASSURANCE

Deloitte & Touche Middle East (DTME) provided an independent limited assurance under ISAE 3000 (Revised) on the preparation of this report in accordance with the GRI Standards. Deloitte & Touche Middle East (DTME) is independent from DMCC at the point that the report is issued. The outcomes of the assurance along with relevant recommendations are presented in the management report that is reviewed at senior level and circulated to data owners. For scope of work and observations, please refer to the independent limited Assurance report shown in pages 6-7 of this Report.

FEEDBACK AND SUGGESTIONS

We welcome your feedback and suggestions on our sustainability performance, commitments, and progress. Please direct your comments to sustainability@dmcc.ae.

Deloitte.

Independent limited assurance report to Dubai Multi Commodities Centre (“DMCC”) on the preparation of the DMCC Sustainability Report for the year ended 31 December 2020 (the “Report”), in accordance with the Global Reporting Initiative Standards: Core Option (the “GRI”).

WHAT WE LOOKED AT: SCOPE OF OUR WORK

DMCC has engaged Deloitte to perform limited assurance procedures on their self-declaration of preparing the Report in accordance with the GRI.

WHAT STANDARDS WE USED: BASIS OF OUR WORK, CRITERIA USED AND LEVEL OF ASSURANCE

We carried out limited assurance procedures over DMCC’s compliance with core level reporting in respect to the application of the Global Reporting Initiative (GRI) Standards in accordance with the International Standard on Assurance Engagements 3000 (Revised) “Assurance Engagements other than Audits or Reviews of Historical Financial Information” (“ISAE 3000”). To achieve limited assurance, ISAE 3000 requires that we review the processes, systems and competencies used to compile the Report, on which we provide limited assurance. It does not include detailed testing for each of the indicators reported, or of the operating effectiveness of processes and internal controls. The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

WHAT WE DID: KEY LIMITED ASSURANCE PROCEDURES

To form our conclusion, we undertook the following procedures:

- Interviewed Management and those with operational responsibility for sustainability performance to assess the application of the GRI in the preparation of the Report;
- Understood, analysed and assessed the key structures, processes, procedures and controls relating to the preparation of the Report;
- Evaluated whether the management approach for the material sustainability issues presented in the Report are consistent with our overall knowledge and experience of sustainability management and performance at DMCC;
- Assessed the completeness and accuracy of the GRI Standards content index with respect to the GRI, including review of reasons for omission; and
- Reviewed the content of the Report against the findings of the aforementioned procedures.

LIMITATIONS

The process an organisation adopts to define, gather and report information on its non-financial performance is not subject to the formal processes adopted for financial reporting. Therefore, data of this nature is subject to variations in definitions, collection and reporting methodology, often with no consistent, accepted external standard. This may result in non-comparable information between organisations and from year to year within an organisation as methodologies develop.

In relation to our work performed on the Report, we note the following specific limitation:

- Our testing did not include assurance of, or detailed testing of the underlying data for each of the indicators reported, or of published assertions. As such, our work does not involve procedures to verify the accuracy of the performance data or assertions published.

OUR INDEPENDENCE AND QUALITY CONTROL

In carrying out our work, we have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA Code), which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour and the ethical requirements that are relevant in Qatar. We have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code.

In performing our work, we applied International Standard on Quality Control 1 and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements

ROLES AND RESPONSIBILITIES

DMCC:

- DMCC is responsible for the preparation of the Report and for the information and statements contained within. They are responsible for determining sustainability objectives, identifying stakeholder groups and determine material topics to be included in the Report and ensuring that these are in line with the GRI criteria. The Management is also responsible for

establishing and maintaining appropriate performance management and internal control systems from which the reported information is derived.

Deloitte:

- Our responsibility is to provide a limited level of assurance on the subject matters as defined within the scope of work above to DMCC in accordance with our letter of engagement, and report thereon. In conducting our limited assurance engagement, we have complied with the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA Code).
- We confirm that we apply International Standard on Quality Control 1 and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.
- Our work has been undertaken so that we might state to DMCC those matters we are required to state to them in this limited assurance report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than DMCC for our work, for this report, or for the conclusion we have formed.

CONCLUSIONS

Based on our limited assurance procedures performed and evidence obtained, subject to the limitations mentioned above, nothing has come to our attention that causes us to believe that the Report has not been prepared, in all material respects, in accordance with the GRI.

EXECUTIVE STATEMENT



Ahmed Bin Sulayem
Executive Chairman
and CEO, DMCC

"The UAE leadership's vision, ambition and drive mean we always strive to push the boundaries of what is possible. At DMCC, we adopt the same attitude, which is why, despite the pandemic, 2020 was a record-breaking year for us."

What importance does sustainability have in DMCC's overall strategic plan?

As a government authority and a world-leading free zone, we firmly believe in our duty to conduct business responsibly and in a way that generates a positive impact across the value chain, the communities in which we operate and society at large. With that in mind, sustainability is integrated into the DNA of our business strategy; embedded in the lifecycle of all our business operations and services. As such, we are committed to the UAE Vision 2021 and Dubai's sustainability ambitions and strategies. We prioritise the UN Sustainable Development Goals based on where we believe we can significantly impact.

Reflecting on 2020, how has DMCC shown resilience in the face of the global pandemic?

The UAE leadership's vision, ambition and drive mean we always strive to push the boundaries of what is possible. At DMCC, we adopt the same attitude, which is why, despite the pandemic, 2020 was a record-breaking year for us, both in terms of company formation and commodities trade performance.

Our resilience comes from many different places. Firstly, our employees continued to work tirelessly despite all the unknowns they faced. Secondly, from our members and the continued trust they place in us. To support each one of the over 19,000 companies that have chosen DMCC as their place to do business, we launched the DMCC Business Support Package – this resulted in us going beyond just retaining business but actually attracting a record number of companies throughout the year. Thirdly, this resilience comes from our robust, forward-looking business strategy, which recognises the central role of innovation, digital transformation, and sustainability.

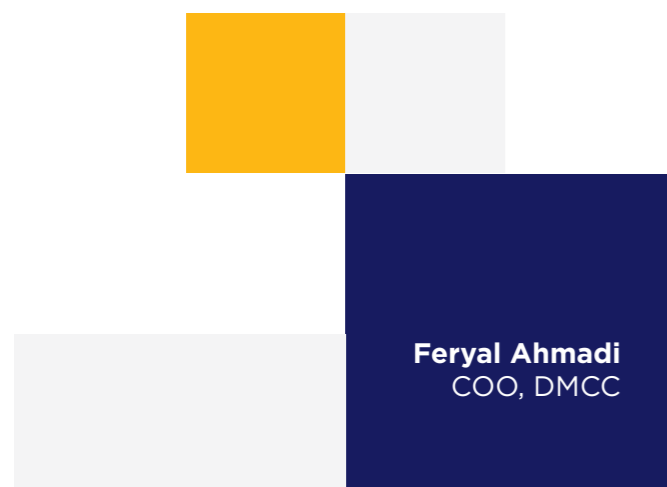
Looking towards 2021 and beyond, what are the main sustainability-related opportunities for DMCC?

Dubai aims to reduce its energy consumption by 30% by 2030, and free zones have an essential part to play. As the largest and fastest-growing free zone in the UAE, DMCC is committed to the UAE's green growth strategy. We have adopted advanced technologies and operational mechanisms to track our environmental footprint accurately. We recognise a data-driven approach is the only way to go if we want to support global net-zero ambitions.

How would you say DMCC contributes to international cooperation to tackle global challenges?

DMCC's mandate is to attract, facilitate, and enable trade flows through Dubai. That simply cannot happen without global cooperation and partnerships with key stakeholders in the industries we operate in. Every year, we sign multiple strategic agreements with leading organisations across the globe to enhance bilateral ties and explore trade opportunities. We travel the world, physically and virtually, to engage with our stakeholders and participate in global conversations to contribute to a more sustainable future. That collaboration and connection is core to our business.

One historic achievement and landmark moment in 2020 was the signing of the Abraham Accords, establishing full diplomatic relations between the UAE and Israel. Subsequently, DMCC signed an agreement with the Israel Diamond Exchange to foster collaboration among two of the world's leading diamond bourses. While we explore other areas and sectors of mutual interest, we look forward to seeing the positive impact this cooperation will bring to our two countries and the region.



Why was it important for DMCC to refine and share its sustainability strategy in 2020?

Governments and businesses the world over are realising that sustainability and sustainable practices are fundamental to success. DMCC is no different, which is why we place sustainability at the core of our business strategy. In 2019, we conducted our second materiality assessment, which saw us engage with a broader stakeholder audience to better understand additional priority topics requiring our attention. In 2020, we further refined our sustainability framework to align with our business values. As a responsible and transparent organisation, we chose to share this strategy to provide all our stakeholders with visibility of our priorities whilst providing a benchmark for accountability.

How did DMCC's sustainable values help the management address the challenges of COVID-19?

At DMCC, we convene, connect, communicate, capacity build and most importantly, we

care. We are committed and collaborative. These values guided our decision-making process and were instrumental in enabling us to address the challenges posed by the pandemic. Our commitment to employees, members, partners and residents meant that we could support all our stakeholders to navigate the impact of a global crisis. Following a collaborative approach, we listened to what their needs were and responded accordingly. As a result, 2020 was a record-breaking year for DMCC.

Why is the SDG Steering Committee important to DMCC's sustainability strategy?

The SDG Steering Committee was formed in 2018 to ensure the collaborative implementation of DMCC's sustainability strategy. It includes representation from across the entire organisation and reports to the Executive Management regularly on the progress made to meet our targets. This governance structure guarantees that sustainability is embedded in everything we do, which in turn allows us to meet or exceed our commitments to the UN Global Compact, UN Women's Empowerment Principles, and the UN Sustainable Development Goals. It also means we have an accountability mechanism in place that keeps us on track to deliver on our sustainability promises.

What have been the priority sustainability topics or SDGs identified under the strategy, and why?

Based on our 24 material topics, we identified seven priority SDGs, where we can make the most impact:

1. Gender Equality – We make an impact through our commitment to the Women Empowerment Principles and by ensuring gender equality is a primary pillar of our social impact programme.

2. Decent Work and Economic Growth - DMCC makes an impact by building our member companies' capacity and holding suppliers to a higher standard.

3. Sustainable Cities and Communities - DMCC makes an impact by making its community safer and more sustainable with one out of five of its focus areas on smart mobility.

4. Responsible Consumption and Production - DMCC makes an impact by reducing waste in the Master Community and integrating responsible procurement practices. As a part of our commitment to the UNGC, we promote UNGC membership and associated reporting to our member companies.

5. Climate Action - DMCC makes an impact by setting baselines, measuring its footprint, reducing energy consumption and implementing improvements through strategic partnerships.

6. Peace, Justice and Strong Institutions - DMCC makes an impact by advancing its regulatory compliance and legal functions with a zero-tolerance policy to corruption.

7. Partnerships for the Goals - DMCC makes an impact by leveraging its ability as a government authority, regulator of a free zone, and a master developer of its mixed-use community, to form partnerships that drive the common good.

"Governments and businesses the world over are realising that sustainability and sustainable practices are fundamental to success. DMCC is no different."

DMCC AT A GLANCE



WHO WE ARE

DMCC is a government entity established by the government of Dubai in 2002. It was founded to provide a physical market and financial infrastructure required for a hub for global commodities trade. Trade, free zone, community and their associated services are all functions that come under the government entity. As the world-leading free zone, DMCC promotes, attracts and facilitates trade through Dubai sustainably and responsibly by offering world-class infrastructure and state-of-the-art facilities alongside a wide range of value-added products and services.

DMCC is located in Jumeirah Lakes Towers, manages a business community of over 19,000 member companies from 190 countries that employ over 60,000 people.

Our unique position allows us to play a significant role in securing Dubai's position as a regional leader for global trade and enabling it to meet its long-term economic, environmental and social ambitions.



OUR VALUES

HIGH PERFORMANCE

We deliver consistent HIGH PERFORMANCE through the services we offer and the partnerships we forge.

COMMITTED

We are COMMITTED to all our stakeholders, employees, members, partners and residents – and to our own success. We bring the energy, focus and resources required to achieve our goals and bring our mission to life.

BOUNDLESS

Our ambition is BOUNDLESS. It redefines world trade, constantly seeking new opportunities through bold and visionary ideas.

COLLABORATIVE

We are COLLABORATIVE in the way we work. Pulling together as a diverse team and working with our members and partners to understand each other's needs.

CLARITY

We are CLEAR on direction, stand by our decisions, and take responsibility for our actions.



OUR OPERATIONS

FREE ZONE

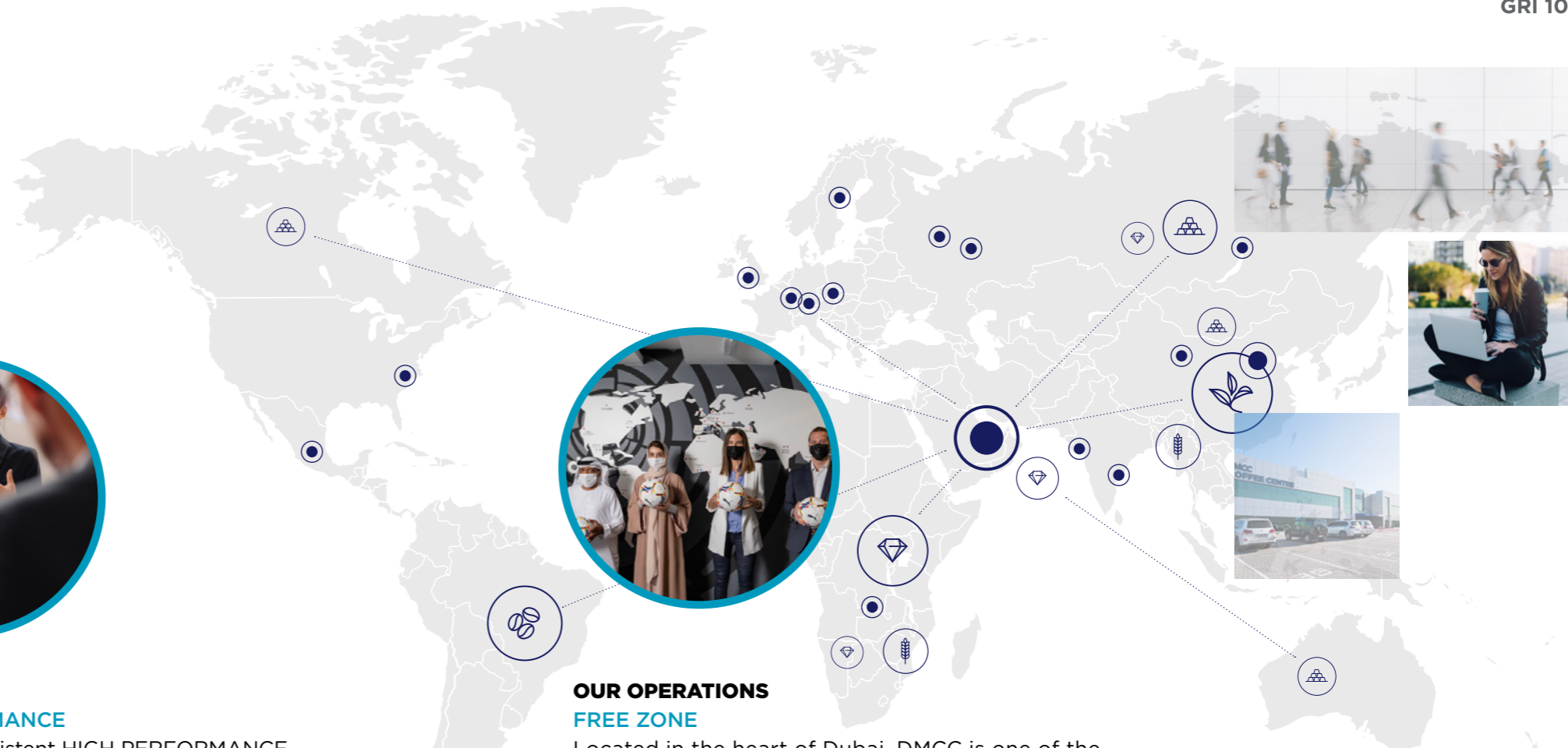
Located in the heart of Dubai, DMCC is one of the world's most interconnected and fastest growing free zones. We strive to make the company set-up process and future expansion seamless, whilst ensuring companies operate with confidence and trade efficiently.

TRADE

By offering everything to set up, grow and build your business, we play a significant role in positioning Dubai as a leading trade hub for commodities. We successfully connect producers to consumers to create an international gateway to the Middle East markets and beyond.

COMMUNITY

Almost 100,000 people live, visit and do business in our vibrant Master Community. We offer modern and beautifully constructed real-estate that offers first-rate facilities such as restaurants, hotels, parks and the very best healthcare and education facilities. We make a concerted effort to bring the community together and have launched Instagram, Facebook, and Twitter channels to this effect. Through these channels, we promote an ecofriendly lifestyle promoting recycling, bike-sharing, and tips to live a more sustainable lifestyle.

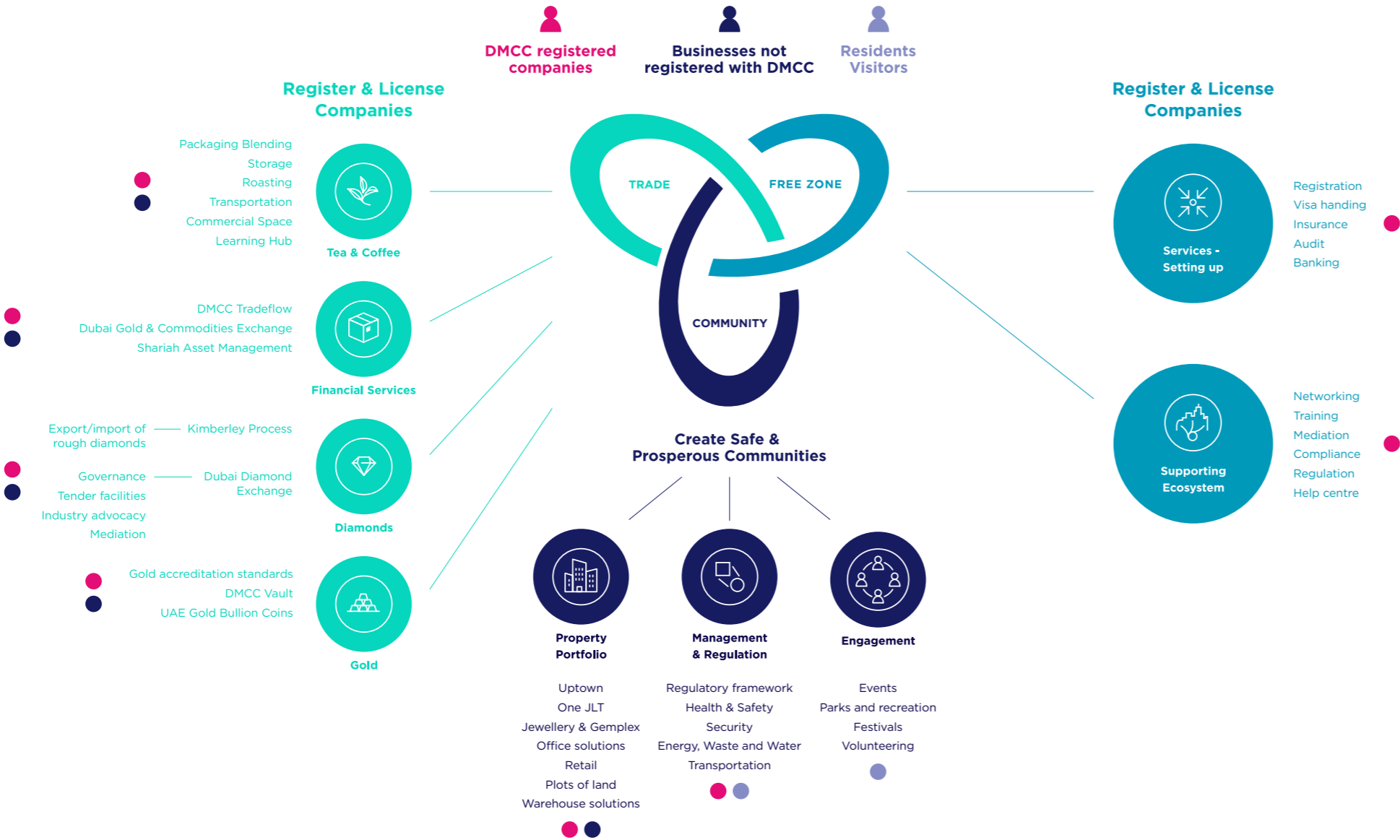


OUR CUSTOMERS AND SERVICES

Made for trade, we are proud to sustain and grow Dubai’s position as the place to be for global trade long into the future. DMCC provides its customers with a multidimensional value proposition. The above synopsis displays the way business owners, residents, and visitors interact with DMCC services.

Business owners can register their business with the free zone and avail its support

services. It is through this activity that DMCC is building on the entrepreneurship ecosystem in the UAE. Business owners in the coffee, tea, or precious metals sectors can take advantage of the specific services made available to them through DMCC’s commodities activities. Residents, visitors, and employees of DMCC registered businesses can enjoy the various opportunities of engagement in the community in a secure and pleasant setting.



OUR EMPLOYEES

2020

TOTAL EMPLOYEES: **294**
Female - **109**
Male - **185**
Nationalities represented - **41**

2019

TOTAL EMPLOYEES: **313**
Female - **113**
Male - **200**
Nationalities represented - **45**

2018

TOTAL EMPLOYEES: **315**
Female - **116**
Male - **199**
Nationalities represented - **43**



Like many organisations globally, we too were required to assess our costs during this crisis. The reduction in our headcount is due to a restructure with a turnover rate of 6.46 %.

HIGHLIGHTS

#1

Named Global Free Zone of the Year by Financial Times' FDI Magazine for a record sixth consecutive year



3

3 major systems integrated with the Smart District Platform (SDP)



1

One JLT Building Management System

2

Environmental sensors
(climate, pollution, noise, flood, waste bins, lakes)

3

Streetlights



37%

Female workforce achieved



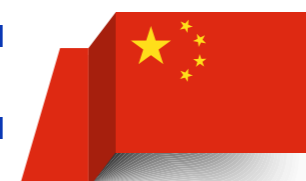
75%+

Migrated more than 75% of our hosted Oracle ERP to the cloud



AED 821,593

Amount saved by One JLT over 8 months, after signing a AED 250,000 Energy Performance Contract



Inaugurated DMCC representative offices in **Tel Aviv, Israel** and **Shenzhen, China**, to support businesses from all industries and sectors in these countries to set up offices in DMCC.

18,000+

Surpassed 18,000 member companies and boasted the most robust performance in 5 years



MATERIALITY ASSESSMENT

In 2019, we conducted an assessment to identify material topics – these are the sustainability topics that are most important and relevant for us to address economic, environmental, and social impacts according to our stakeholders. We conduct this assessment every two years.

We used the GRI Standards Principle of Materiality for our materiality assessment in 2019 and applied a four-step process:

- 1

Consolidated an extensive list of topics through various sustainability standards, such as GRI Standards, AA1000, CDP, DJSI, SASB. Selected the key topics based on the impact of DMCC, which were submitted to the stakeholders for evaluation.
- 2

Conducted an internal and external survey with our stakeholders. These stakeholders include customers, community members, employees, suppliers, institutions and policymakers, industry peers, and NGOs and community organisations.
- 3

Conducted in-depth internal and external stakeholder interviews to provide additional perspectives.
- 4

Analysed results from the stakeholder surveys and interviews to conclude an appropriate interpretation of material topics.

DMCC’s materiality assessment identified a list of 24 social, economic, and environmental topics through which we engage with our stakeholders.

LIST OF MATERIAL TOPICS

Importance to internal & external stakeholders						
HIGHLY SIGNIFICANT	Score: 185 - 190		Score: 191 - 195		Score: 196 - 200	
	Economic Performance		Responsible Sourcing		Community	
	Emiratisation		Customer Excellence		Regulatory Compliance	
MID SIGNIFICANT	Score: 173 - 174		Score: 175 - 178		Score: 179 - 184	
	Gender Equality		Procurement Practices		Digitalisation	
	Innovation		Infrastructure		Training & Development	
	Diversity & Inclusion		Customer Privacy		Wellbeing	
			Data protection & Cyber Security			
			Occupational Health & Safety			
	Score: 154 - 159		Score: 160 - 169		Score: 170 - 172	
SIGNIFICANT	Green Buildings		Energy		Anticorruption	
	Water Use		Governance & Succession Planning		Human Rights	
	Waste Management & Reduction					

Using a scoring system (1-5, with 5 being highest in importance) we were able to shortlist 24 material topics in line with our operations, business strengths, and areas of influence. The matrix showcases the aggregate average responses of both internal and external stakeholders.

For further information and details on the materiality assessment process please refer to www.dmcc.ae/sustainability.

STAKEHOLDER ENGAGEMENT

Stakeholders were identified by the SDG Steering Committee based on the frequency of engagement and financial and social impact on the business. DMCC engages directly with all of these stakeholders and engaged them in the materiality process. We revisit the relevance of these stakeholders every two-three years at the time of a materiality review.

ENGAGE WITH STAKEHOLDERS

Customers	Communities	Colleagues	Suppliers	Institutions & Policy Makers	Industry Peers	NGOs and Community Partners
DMCC is a customer focused company. Understanding and meeting the needs of their member companies is at the core of what they do.	DMCC is closely connected with its community where 100,000 people live and work and 18,000 companies are registered.	DMCC wants its employees to be ambassadors for its activities putting their development at the forefront.	DMCC suppliers are valued business partners. Stable and long term relations are key to mutual growth.	DMCC, a government authority, plays the dual role of developing and implementing policies. DMCC follows UAE Vision 2021 and the Dubai Plan 2021.	DMCC recognises that some topics are best addressed collectively. DMCC works with industry peers to define industry standards and common solutions to shared risks.	DMCC continues to formalise its social impact strategy. This will ensure the relationship with NGOs and community partners become more strategic.

HOW DMCC ENGAGES

Customers	Communities	Colleagues	Suppliers	Institutions & Policy Makers	Industry Peers	NGOs and Community Partners
Help customers grow their business by offering capacity building initiatives, financial services, infrastructure and networking opportunities while supporting them in their sustainability journey.	Create a safe, green, and leisurely family friendly environment where residents can live and businesses can operate responsibly. Continuously enhancing mechanisms for feedback and open communications.	Commit to being an employer of choice by offering diverse capacity building opportunities, conducting satisfaction surveys, and always exploring new ways for more open communications and enhanced diversity.	Facilitate a transparent and digital procurement process, while advocating for a responsible supply chain supplemented with capacity building and open dialogue.	Implement and create awareness for local laws, new and old, to encourage best practice. Engaging on special committees, maintaining dialogue and using the DMCC platform to host events.	Multi-stakeholder initiatives such as the Kimberley Process, OECD governance group, and Diamond Development Initiative to ensure protection to the most vulnerable in the value chain reducing the flow of conflict diamonds.	Maintain transparency through annual reporting and open dialogue on project progress with focus on data driven stories.

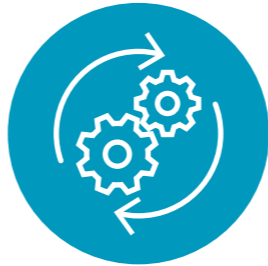
Customers	Communities	Colleagues	Suppliers	Institutions & Policy Makers	Industry Peers	NGOs and Community Partners
Customer satisfaction surveys.	Social media and events.	Employee satisfaction survey	Supplier portal.	Meetings, events, inspections and audits, public affairs team.	Public affairs team, events, publications, partnerships.	Meetings, MOUs, on going dialogue.

SUSTAINABILITY STRATEGY

Our sustainability strategy helps drive our local and global impact aligned to environmental and social principles and the SDGs across all operations. This strategy illustrates a framework that sits as the foundation to our commitment to deliver positive impact across three pillars:



Build a sustainable city: Our objective through this pillar is to holistically address DMCC’s environmental footprint locally. It implements projects to enhance our green building standards; health & safety; water, energy, and waste management, navigated by the DMCC ‘Smart and Sustainable District’ strategy.



Operate a responsible business ecosystem: Our objective is to achieve a resilient business foundation to create positive impact. We do this in several ways, including the digital transformation of our operations while ensuring customer privacy and cybersecurity. Additionally, we enhance our regulatory compliance practices that apply to both employees and registered companies. As signatories of the UNGC, responsible sourcing, human rights and anticorruption are integral to us.



Committed to operational excellence: Our objective through this pillar is to optimise organisational policies and processes, therefore working on topics such as Emiratisation; gender equality; diversity & inclusion; training & development; wellbeing; and customer excellence.

For each of these pillars, we have established long-term ambitions and targets to improve the lives of our people and our customers and drive significant positive impact across the value chain and the environment. Last year, a scorecard was developed to track progress on KPIs and ensure accountability towards DMCC’s long term ambitions. A KPI was identified for each material topic. This year, each section of the report displays an update on this scorecard with the intention to share progress with stakeholders.



The sustainability framework above reflects our unique 5C management approach to sustainability, divided between the three pillars. These 5Cs – Convene, Connect, Communicate, Capacity Build, and Care is how we collaborate with a broad range of stakeholders to shape the future of global trade through growth, supply chains, finance, infrastructure, and sustainability. This year we have further defined how ‘Care’ will be implemented, which can be found under the ‘Social Impact strategy’ section below.

Convene	Connect	Communicate	Capacity Build	Care
Leverage the free zone’s position to drive sustainable business practices.	Connect our diverse stakeholders to grow their network.	Communicate best practices and drive thought leadership in the industry.	Train our stakeholders to build sustainability knowledge.	Support global social impact by strategically contributing 0.5% of the company’s net profit.

SUSTAINABILITY GUIDELINES

Following the establishment of the DMCC sustainability strategy in 2019, DMCC issued its ‘Sustainability Guidelines’ with a ‘Sustainability Policy Statement’ which outlines our commitment to ensure business operations and practices are continuously aligned with global best practices in the field of sustainability. In addition to the policy statement, which is publicly available on our website, the Guidelines include a sustainability management programme that supports the operationalisation of the sustainability strategy framework. The sustainability management programme is based on the Plan, Do, Check, Act (PDCA) framework with a focus on energy, water, and waste management.

SOCIAL IMPACT STRATEGY

We remain committed to positive impact and therefore launched the DMCC social impact strategy this year following our social impact policy. This is represented by the ‘5th C’ under the DMCC sustainability framework ‘Care’ - reinforcing our strategic commitment to address entrepreneurship, vulnerable communities, and gender equality as a cross-cutting topic. Monitoring & evaluation systems will remain a key component of all partnerships.

Entrepreneurship

One of the reasons DMCC is recognised as the best free zone in the world is because of our role in advancing the entrepreneurship ecosystem in Dubai. Therefore, in line with our business strengths and strategy, entrepreneurship has been identified as a core pillar of the social impact strategy.

countries, industry representatives and NGOs that implement projects to safeguard artisanal miners.

Gender Equality

Gender equality is a cross-cutting topic integrated into both pillars of the social impact strategy, which means we aim to support female entrepreneurs and prioritise development organisations focused on female protection and equality.

Vulnerable Communities

We are alert to the vulnerable communities affected by the precious metals industry. Therefore, we have leveraged our position as ‘connector’ to advocate for responsible sourcing through local and international standards, for example, the Kimberly Process and the Dubai Good Delivery Standard. DMCC has taken a leadership role in advancing the Kimberly Process (KP) by setting up a UAE KP office in 2003 and becoming the only Arab country to be the former Chair of the KP in 2016. The Kimberly Process exists to reduce the flow of conflict diamonds, includes 82 member



GOVERNANCE

Corporate responsibility and sustainability are essential to our business, purpose and how we operate. Our business, environmental sustainability, and social impact investment are governed by four bodies at DMCC as can be seen in the figure below.

In early 2020, His Highness Sheikh Mohammed bin Rashid Al Maktoum, Ruler of Dubai, Vice President and Prime Minister of the UAE, issued a new law according to which the Dubai Multi Commodities Centre Authority (DMCC Authority) will be responsible for supervising DMCC.

The new law outlines the structure of the DMCC Authority and specifies the procedures to form the Board and executive body of the DMCC Authority.

BOARD OF DIRECTORS

The Advisory Board is responsible for supervising all DMCC policies and directions. It comprises of five members that are appointed by our Chairperson.

Name	Designation	Executive / Non-Executive
HE Hamad Buamim	Chairman	Non-executive
Hardeep Singh	Member	Non-executive
Yuvraj Narayan	Member	Non-executive
Abdulwahid Alulama	Member	Non-executive
Ahmed Bin Sulayem	Member	Executive

The Board of Directors age range: 30-50 (60%), over 50 (40%). At present, there is no female representation.

EXECUTIVE COMMITTEE

The Executive Committee comprises of the heads of all DMCC business units, i.e. the primary decision-makers of the organisation. The Executive Committee is accountable for the oversight of the sustainability strategy.

INTERNAL AUDIT

Internal Audit is an independently managed function at DMCC that is responsible for enhancing policies and procedures through risk-based, ethical and objective advice.

SDG STEERING COMMITTEE

Our SDG Steering Committee ensures the collaborative implementation of the sustainability strategy and helps us meet our commitments to the UNGC, WEPs, and SDGs. The Committee is led by our Chief Operating Officer and has six more members from the Executive Management representing core lines of DMCC’s operations.

In 2020, we drafted new terms of reference (ToRs) for the SDG Steering Committee to help better coordinate sustainability efforts within the broader 2030 SDG Agenda and improve the management and implementation of the DMCC Sustainability Strategy and Sustainability Management programme. Regular updates are provided to the SDG Steering Committee on progress being made towards the sustainability strategy. In addition, the SDG Steering Committee approves the content of the sustainability report including information related to material topics.

The SDG Steering Committee will also work towards the integration of sustainability considerations into enterprise risk assessment, our business processes and long-term planning activities. Furthermore, it will manage our social impact fund, including the approval of donations and monitoring and evaluation of organisations that receive financial support from DMCC in line with our social impact strategy and policy.

Code of Conduct

The Code of Conduct was updated in 2020 and approved by the Executive Committee. After it was approved, it was circulated to all DMCC employees. All employees were required to read and acknowledge that they have read the terms in the document. In addition, a mandatory training was conducted online with automated notification to HR on each employee’s status of completion. Development of the Code of Conduct is overseen by the Director of HR working closely with the training and benchmarking team to ensure the document meets international and local standards with effective training material for maximum awareness and effective integration.


SDG INDEX

At its core, our aim is to uplift businesses, economies and people through the power of trade. We share our vision with the UN to achieve a future that is more sustainable, inclusive, peaceful, and better for all. We firmly believe that our business can play a catalytic role in helping the UAE meet its commitments to the UN to solve some of the world's biggest social and environmental challenges by 2030.

Our sustainability efforts align with many of the UN SDGs. There are seven SDGs that we have identified as particularly relevant for our business, its expertise, and its impact on the society and the environment:


SDG 5 – GENDER EQUALITY

We are a signatory to the WEPs and are committed to gender equality in our workplace.

5 GENDER EQUALITY	SDG target	More details in page(s)
		
5.1: End all forms of discrimination against all women.		23, 47-49
5.5: Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision making in political, economic and public life.		23, 47-49
5.c: Adopt and strengthen sound policies and enforceable legislation for the promotion of gender equality and the empowerment of all women and girls at all levels.		23, 47-49

SDG 8 – DECENT WORK AND ECONOMIC GROWTH

Through our business, we are committed to inclusive growth that can drive progress and create decent economic opportunities.

8 DECENT WORK AND ECONOMIC GROWTH	SDG target	More details in page(s)
		
8.1: Sustain per capita economic growth in accordance with national circumstances and, in particular, at least 7 per cent gross domestic product per annum in the least developed countries.		53
8.2: Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high – value added and labour – intensive sectors.		56-57
8.3: Promote development – oriented policies that support productive activities, decent jobs, formalisation of entrepreneurship, creativity and innovation, and encouraging the formalisation and growth of micro-small and medium-sized enterprises, including through access to financial services.		52, 60-61

SDG 11 – SUSTAINABLE CITIES AND COMMUNITIES

Our Master Community is inclusive, safe, resilient and sustainable for its residents, business owners and visitors.

11 SUSTAINABLE CITIES AND COMMUNITIES	SDG target	More details in page(s)
		
11.2: By 2030, provide access to safe affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.		39-40
11.6: By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management.		35-39

SDG 12 – RESPONSIBLE CONSUMPTION AND PRODUCTION

Our sustainability strategy aims to drive economic and social progress in a way that reduces our negative impact on the planet.

12 RESPONSIBLE CONSUMPTION AND PRODUCTION	SDG target	More details in page(s)
	12.5: By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.	35-39
	12.6: Encourage companies, especially large transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.	52
	12.7: Promote public procurement practices that are sustainable, in accordance with national policies and priorities.	58-60

SDG 13 – RESPONSIBLE CONSUMPTION AND PRODUCTION

A key objective of our strategy is to be more efficient when consuming energy, water and other resources so as to significantly reduce our carbon footprint.

13 CLIMATE ACTION	SDG target	More details in page(s)
	13.2: Integrate climate change measures into national policies, strategies and planning.	31-34, 35-39
	13.3: Improve education, awareness – raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.	31-34, 35-39

SDG 16 – PEACE, JUSTICE, AND STRONG INSTITUTIONS

We believe that businesses that are fair and have a zero - tolerance towards corruption are an integral part of fostering peace in our society.

16 PEACE, JUSTICE AND STRONG INSTITUTIONS	SDG target	More details in page(s)
	16.5: Substantially reduce corruption and bribery in all their forms.	57-58
	16.6: Develop effective, accountable and transparent institutions at all levels.	24-25
	16.7: Ensure responsive, inclusive, participatory and representative decision making at all levels.	24-25, 18-20

SDG 17 – PARTNERSHIPS FOR THE GOALS

To create meaningful partnerships for sustainable development, we leverage our ability as a government authority, owner of a free zone, and a master developer.

17 PARTNERSHIPS FOR THE GOALS	SDG target	More details in page(s)
	17.16: Enhance the Global Partnership for Sustainable development, complemented by multi-stakeholder partnerships that mobilise and share knowledge, expertise, technology and financial resources, to support the achievement of the SDGs in all countries, in particular developing countries.	60-61
	17.17: Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships.	60-61



SUSTAINABLE CITY

Track and improve local impact

Material Topic	Key Performance Indicators	Actions Taken
Infrastructure	Continuation of #1 free zone in the world	Winner of the FDI Free Zone of the Year 2020.
Health & Safety	Education of stakeholders	Stakeholders educated on COVID-19 safety protocols and regulations.
	Health and Safety Excellence (Uptown Dubai)	Uptown Dubai reached over 7 million safe man-hours without an LTI. ¹
	HSE Compliance (Community Developments non-DMCC)	Compliance with HSE protocols, along with COVID-19 guidelines, was robust.
	Management of HSE Suppliers	All suppliers have received questionnaires related to their responsible business practices.
	Smart City HSE	2 international safety awards
Green Building	Reduction of Community Fire Risk	Audits were carried out and an action plan was set for rectification of the issues raised.
	Improvement of building operations through initiatives	Reduced by 17% in One JLT with a target of 30% to be achieved by the end of 2021.
Water Use	Improvement of infrastructure	Master Community LED lights installation, water efficiency, energy microgrid in Uptown Dubai, OneJLT's retrofitting project.
		A tendering exercise was undertaken to carry out refurbishment works to the lakes that will reduce the amount of debris and pollutants from the deteriorating lake structures falling into the lakes.

¹ Lost Time Injury

	Improvement of data tracking and monitoring	Previously installed lake sensors are now linked into DMCC's Smart District Platform (see screen shot below). As a result, live data is now being collected about certain lake water quality and pollution parameters.
	Integration of green practices amongst our departments and community stakeholders	Lake dye has been introduced to reduce the amount of light within the lakes in order to decrease the amount of algae within the lake water. This also improves the water quality and air quality within the vicinity of the lakes.
Waste Management	Facilitation of recycling	More than 20% increase in the amount of waste recycled.
	Improvement of water quality for Master Community lakes	A tendering exercise was undertaken to install lake borewells that will pump clean ground water into the lakes. These will be installed during 2021 and will provide a sustainable source of good quality clean water to the lakes.
	Integration of green practices amongst our departments and community stakeholders	Social media campaigns were run to encourage residents, owners and occupiers within the Community to do more recycling.
	Reduction of plastic and paper consumption	There was an increase in waste collection within which plastic and paper is extracted for recycling, resulting in a reduced environmental footprint.

Energy	Improvement of data tracking and monitoring	Launch of 'Measurabl' ² , an international digital platform integrated with DEWA that tracks energy and water consumption across the Master Community and DMCC assets.
	Integration of green practices amongst our departments and community stakeholders	Frequent social media campaigns targeting tenants.
	Communicate DMCC's approach to sustainability environment to all stakeholders	Published our Sustainability Policy Statement, available on the website and provided to RERA.
Community	Implementation of Smart and Sustainable District Energy	Smart and sustainable projects rolled out in 2020.

We are in the business of creating spaces that fulfil our Community's needs to live, work and thrive. These spaces benefit our owners, residents as well as visitors, and through them, we build lasting relationships with these stakeholders, helping them meet their objectives and more.

Our health, safety, and environmental efforts are critical in creating a vibrant and sustainable community. DMCC is committed to provide a clean and healthy environment that fosters wellbeing.

Our Master Community is a mixed-use master community located in the heart of the Emirate of Dubai, UAE, which incorporates residential, commercial, retail and leisure uses. It includes

all of Jumeirah Lakes Towers District, Uptown Dubai District, the Jewelry and Gemplex District, One JLT. Since its development, we have taken many steps to optimally manage water, waste, energy and other environmental-related issues.

This section demonstrates efforts made to positively impact our stakeholders' lives within our Master Community and align with the UAE and Dubai's priorities towards green growth and sustainable infrastructure. This year we developed sustainability guidelines for the effective management of energy, water, and waste and released a sustainability policy statement supported by the sustainability management programme. All waste in the Master Community is collected

² www.measurabl.com

by Bee’ah, a leading waste management entity in the UAE. They provide consolidated data reports so that DMCC can monitor progress on waste in the area. One JLT receives waste management information from their development partner Mace. Next year, we will explore the consolidation of waste management reports in collaboration with partners to ensure there is consistency in metrics being tracked and improved clarity on waste being generated versus waste being disposed and recycled.

Understanding the entire energy footprint of our Community is vital for us as it enables DMCC to put in place the right management strategies to ensure sustainable operations of the Community’s energy demand. Throughout 2020, we continued to digitally monitor our electricity consumption across the Master Community and our owned assets to track our environmental footprint.

We also invested in LED lights for the cluster street lights, enterprise zones and various external landscaping areas in the Master Community. These will significantly reduce energy consumption and maintenance costs starting in 2021.

The UAE has one of the highest per capita water consumption rates in the world with demand growing. DMCC takes this issue area seriously. The water consumption in our Master Community includes retail and development use, which is why we take a multi-stakeholder approach and engage our partners and tenants to reduce water consumption and wastage. To tackle the high-water footprint due to our landscaping irrigation network, we partnered with a new service provider to reduce the number of leakages and excess watering – this will result in significant water savings from 2021 onwards.

CRITICAL HEALTH AND ENVIRONMENT-RELATED ACHIEVEMENTS IN OUR MASTER COMMUNITY:



- Our advanced energy microgrid in Uptown Tower won the Construction Week Sustainability Initiative of the Year.
- We launched the ‘Measurabl’ platform which tracks DEWA bills across the Community.
- 80% of our smart district systems integrate with the Smart District Platform.
- Our air-quality systems allow us to monitor air quality every five minutes.

In the coming year, we will be approaching all buildings in our Community to advocate for reduced energy consumption. We will also continue our digitalisation process with GIS to ensure that we use the best technology to ensure that our spaces are at the forefront of innovative sustainable practices.

ENERGY, WATER AND WASTE MANAGEMENT

JUMEIRAH LAKES TOWERS³

We significantly improved the water quality of the JLT lakes during the year by activating an interim bore-well that also helped prevent the lakes from drying out. In the coming year, we will launch our new bore-well project to produce clean water for refilling the lakes and reduce our reliance on chemicals for cleaning.

Energy, Water and Waste Performance 2018/2019/2020			
Indicator	2018	2019	2020
Energy Usage (GJ) ⁴	44,725 GJ (5290 tCO2)	45,410 GJ (5371 tCO2)	44,869 GJ (5307 tCO2)
Water consumption (m3) ⁵	33,409 m3 (174 tCO2)	34,595 m3 (180 tCO2)	35,396 m3 (185 tCO2)
Treated Sewage Effluent (m3)	527,826	462,249	779,957
Waste collected (tonnes) ⁶	20,192	27,015	26,584.52
Recycled waste (tonnes)	123	128.4	151.6

UPTOWN DUBAI DISTRICT

Uptown Dubai is one of the city’s upcoming residential and commercial districts with a range of high-end facilities such as world-class dining, unique retail outlets, a central entertainment plaza and some of the world’s most recognised hotels and businesses.

At Uptown Dubai, our vision is to introduce several innovatively built environment features that will integrate luxury with sustainability.

This year, within Uptown Dubai, we launched our feature project - the 340-metre high

³The area was referenced as ‘Master Community’ in the 2019 report
⁴CO2 emissions have been calculated using DEWA’s 2018 grid emission factor for Electricity 0.4258 tCO2e/MWh
⁵CO2 emissions have been calculated using DEWA’s 2018 grid emission factor for Water 23.69 tCO2e/MIG
⁶DMCC Master Community collects waste data in cubic metres. To ensure reporting consistency with the 2018 and 2019 Sustainability Report, which used a conversion factor for the average density for different domestic solid waste components as 143.77 kg/m3. The original source: https://www.researchgate.net/publication/261357543_Composition_of_Domestic_Solid_Waste_and_The_Determination_of_its_Density_Moisture_Content_A_case_study_for_Tikrit_City_Iraq

Uptown Tower. This tower will complement our sustainability vision by achieving a LEED Gold certification. The tower will also feature an advanced energy microgrid recently awarded the Construction Week Sustainability Initiative of the Year – a highly commended honour. This microgrid system will help reduce the carbon footprint of construction by more than 50% and energy costs by 20%.

The construction site of Uptown Dubai features solar PV panels. To date, this is the largest solar plant powering a construction site. Furthermore, based on our 2021 plans, Uptown Dubai will be the first Building Information Management (BIM) & Computer-Aided Facilities Management (CAFM) managed facility within our portfolio, promising very significant operational cost efficiencies and savings.

Energy, Water and Waste Performance 2018/2019/2020			
Indicator	2018	2019	2020
Renewable fuel sources - Solar power (GJ)	N/A	67	1945
Non-Renewable fuel sources (GJ) Diesel consumption Electricity from the main grid ⁷	569	2711	6547 3410 GJ (403 tCO ₂)
Water consumption (m ³) ⁸	2152 m ³ (11 tCO ₂)	15,914 m ³ (83 tCO ₂)	49,393 m ³ (258 tCO ₂)
Waste (Reuse and landfill) (tonnes)	233	3897	6486.12
Recycled waste Hazardous (gallons) Non-hazardous (tonnes)	0.6	60 17.39	5.4 (waste oil) 545.79

DMCC TEA AND COFFEE CENTRES

Our Tea and Coffee Centres – two purpose-built facilities in the Jebel Ali Free Zone Authority (JAFZA) - have helped transform Dubai into a global hub for tea and coffee trade. The Tea Centre is the largest site for re-exporting tea globally, and the Coffee Centre

serves as a one-stop-shop for coffee giants across the globe.

Both these centres include areas for processing, packing, storage, and commerce, and they have an environmental impact that

we are always monitoring to ensure optimal operations with efficient energy management, water consumption and waste generation.

2020 was an outstanding year for our Coffee Centre as we completed the handling of more than 10,000 metric tonnes of coffee beans. The increase is primarily due to the 1,100% increase in coffee roasted and packed at our centre.

The Tea Centre also had an increase of 48.7% of bulk volumes processed, which resulted in an increase of energy usage, waste consumption and waste collected. As the recycling of waste depends on the waste management provider located in Jebel Ali Free Zone, DMCC is looking for a solution to improve the process in 2021.

DMCC Tea Centre Energy, Water and Waste Performance 2019/2020		
Indicator	2019	2020
Energy usage (GJ) ⁹	3,679 GJ (435 tCO ₂)	3,922.81 GJ (464 tCO ₂)
Water consumption (m ³) ¹⁰	5,565 m ³ (29 tCO ₂)	7,284 m ³ (38 tCO ₂) ¹¹
Waste collected (tonnes)	289	1080
Recycled waste (tonnes)	37.79	27.54

DMCC Coffee Centre Energy, Water and Waste Performance 2019/2020 ¹⁶		
Indicator	2019	2020
Energy usage (GJ) ¹²	5,400.9 GJ (639 tCO ₂)	6,533.94 GJ (773 tCO ₂)
Water consumption (m ³) ¹³	N/A	1231.66 m ³ (6 tCO ₂) ¹⁴
Waste collected (tonnes)	84	360
Recycled waste (tonnes)	2	0 ¹⁵

⁷CO₂ emissions have been calculated using DEWA's 2018 grid emission factor for Electricity 0.4258 tCO₂e/MWh
⁸CO₂ emissions have been calculated using DEWA's 2018 grid emission factor for Water 23.69 tCO₂e/MIG

⁹CO₂ emissions have been calculated using DEWA's 2018 grid emission factor for Electricity 0.4258 tCO₂e/MWh
¹⁰CO₂ emissions have been calculated using DEWA's 2018 grid emission factor for Water 23.69 tCO₂e/MIG
¹¹Increase in manpower and the utilisation of two pantries to maintain social distancing due to COVID -19
¹²CO₂ emissions have been calculated using DEWA's 2018 grid emission factor for Electricity 0.4258 tCO₂e/MWh
¹³CO₂ emissions have been calculated using DEWA's 2018 grid emission factor for Water 23.69 tCO₂e/MIG
¹⁴2 sub metres were installed in the Coffee Centre for Warehouse B and C
¹⁵Production in 2020 was minimal, and therefore there was no recycled waste generated
¹⁶The coffee centre became fully operational in 2019 and therefore data for 2018 has not been included

ONE JLT

One JLT is our flagship green building situated in the Master Community. One JLT is a premium LEED Gold Standard building that offers energy-efficient commercial space. The building has offices and retail space that come in either shell and core or fitted settings and provides a convenient location due to its proximity to Dubai’s main road, and public transportation stops.

One JLT is a sustainable space that mixes indoor greenery into workstation zones and collaboration areas. It’s LEED Gold certification means that it has several features that minimise its impact on the environment by focusing on energy and resource-efficiency, generating less waste, storage and

collection of recyclables, renewable energy use (solar car shades), and indoor water use reduction. Since its certification, One JLT has continued to improve in its performance and efficiency due to the processes put in place in line with the LEED Gold building standard, including the diversion of waste from landfills and reduced energy consumption through efficient retrofitting.

In 2020, we completed One JLT’s retrofitting project – this has resulted in substantial energy reductions during the year. The initial capital invested by DMCC in this project was recovered within the first three months of implementation due to the cost savings in energy consumption.

One JLT Energy, Water and Waste Performance 2018/2019/2020			
Indicator	2018	2019	2020
Energy usage (GJ) ¹⁷	10,541.37 GJ (1247 tCO2)	10,990.10 GJ (1300 tCO2)	9,080.76 GJ (1074 tCO2)
Water consumption (m3) ¹⁸	8,535.19 m3 (45 tCO2)	10,032.40 m3 (52 tCO2)	8,685.21 m3 (45 tCO2)
Waste collected (tonnes) ¹⁹	464.55	655	729
Recycled waste (tonnes)	1.82	2.62	4.12

CASE STUDY: ONE JLT ENERGY RETROFIT

The electricity consumption for the years 2018, 2019 and 2020 was plotted and analysed to identify the three-year trend. The electricity consumption has reduced after the retrofit and continues to be lower than both the baseline and 2019 periods.

¹⁷CO2 emissions have been calculated using DEWA's 2018 grid emission factor for Electricity 0.4258 tCO2e/MWh
¹⁸CO2 emissions have been calculated using DEWA's 2018 grid emission factor for Water 23.69 tCO2e/MIG
¹⁹One JLT collects waste data in cubic metres. To ensure reporting consistency with the 2018 and 2019 Sustainability Report, which used a conversion factor for the average density for different domestic solid waste components as 143.77 kg/m3. The original source: https://www.researchgate.net/publication/261357543_Composition_of_Domestic_Solid_Waste_and_The_Determination_of_its_Density_Moisture_Content_A_case_study_for_Tikrit_City_Iraq

We also plotted and analysed the chilled water consumption for 2018, 2019 and 2020 to identify the trend. Our analysis again shows significant savings in chilled water consumption as an interactive effect of the ECMs installed.

In summary, we have achieved our target of guaranteed annual electricity savings of 23% in a matter of eight months; in addition to the 41% savings in chilled water consumption. Collectively, these have resulted in savings of close to AED 821,592 over eight months.

DMCC’S SMART AND SUSTAINABLE DISTRICT

For the past 19 years, we have focused on building places that bring value to everyone. The spaces created are not just meeting current expectations of owners, residents and visitors today, but are also preparing for tomorrow. This means that whatever we do is in line with Dubai’s vision to be the happiest and most technologically advanced city on earth.

Through our partnership with Etisalat Digital, we have rolled out a range of smart solutions helping our Master Community become the first smart and sustainable district of its kind in

the region. We are predominantly focusing our efforts on Smart Mobility and Smart Infrastructure – these areas will help us tackle our environmental impact throughout our operations, but they will also fully support and address all our stakeholders’ needs. Improvements in mobility and green building standards are critical material topics for us and are managed through KPIs distinguished by our sustainability scorecard, processes under DMCC’s sustainability guidelines and objectives under the ‘Smart and Sustainable District Strategy’.

MAIN SMART AND SUSTAINABLE PROJECTS ROLLED OUT IN 2020:



- Under Smart Mobility, we introduced our bike and e-scooter initiative throughout the Master Community.
- For Smart Visitor Parking, we enhanced our central permit parking scheme and installed visitor parking sensors in the RTA visitor parking.

- For Smart Building & Energy Management, the One JLT Building Management System has integrated with the SDP.
- For Smart Data Collection, we have connected all environmental sensors (climate, pollution, noise, flood, waste bins, lakes) to the SDP.
- For Smart Street Lighting, new streetlights were installed and connected to the SDP.
- We designed and produced the Smart Kiosk and Public WiFi for installation in 2021.

HEALTH AND SAFETY

We aim to achieve excellence with regards to our health and safety responsibilities throughout our Master Community. Last year, our Health & Safety (H&S) practices were the centre of our efforts to effectively protect our owners, residents, and visitors' wellbeing.

We had several world-class achievements in 2020 – these are listed below. In 2021,

we will continue our focus on wellbeing to safeguard our occupiers, visitors and those who work in our managed portfolio.

The boundary of this topic covers DMCC H&S performance for its permanent employees, contractors, sub-developers, the DMCC Coffee Centre, the DMCC Tea Centre and the Master Community.

CRITICAL HEALTH AND SAFETY ACHIEVEMENTS IN 2020:



- Major HVAC overhaul, cleaning and sterilisation work, and air quality testing were carried out in all of our property assets.
- Within the Master Community, air quality sensors have been installed that provide live monitoring of air quality within the District.
- We won two international safety awards from the British Safety Council (BSC):
 - March 2020 award for demonstrating a strong commitment to good health and safety management during 2019;
 - June 2020 award as the Joint Country Winner – UAE.
- Uptown Dubai reached over 7 million safe working hours.
- Eight of our colleagues started their National Examination Board in Occupational Safety and Health (NEBOSH) training.

2020			
HSE indicators	Master Community	Uptown District	DMCC Tea and Coffee Centres
Total hours worked	3,030,471	866,7024	532,829
Total number of lost day rate	0	0	0
Total number of lost time injuries	0	0	0
Total number of occupational illnesses/diseases rate	0	0	0
Total number of fatalities (recordable / work-related)	0	0	0
Non-compliance with environmental laws and regulations	0	0	0

2019			
HSE indicators	Master Community	Uptown District	DMCC Tea and Coffee Centres
Total hours worked	2,393,876	1,509,599	453,036.93
Total number of lost day rate	0	0	0
Total number of lost time injuries	0	0	0
Total number of occupational illnesses/diseases rate	0	0	1 (temporary worker fingertip amputation)
Total number of fatalities (recordable / work-related)	0	0	0
Non-compliance with environmental laws and regulations	0	0	0

2018			
HSE indicators	Master Community	Uptown District	DMCC Tea and Coffee Centres
Total hours worked	1,267,721	471,800	140,130
Total number of lost day rate	0	0	0
Total number of lost time injuries	1 <small>(a security guard was physically assaulted)</small>	0	1
Total number of occupational illnesses/diseases rate	0	0	0
Total number of fatalities (recordable / work-related)	0	0	0
Non-compliance with environmental laws and regulations	0	0	0

The amputation occurred due to building maintenance issues. Regular building maintenance audits have been scheduled to mitigate the risk of future incidents.

The HSE team collects health and safety performance data monthly for the free zone, Master Community and towers. It is through these dashboards that the team can assess risks routinely across DMCC properties and improve current systems. To elevate efficiency, a health and safety software solution was procured in 2020 and will be launched in 2021 that will automate data related to accidents, inspections and injuries. The medium-term ambition is to increase the number of data points tracked through the system.

The HSE team and HR department oversee all professionals working towards the health and safety of the entity. Confidential information sits with the HR department. Workers report risk-related hazards and hazardous situations to the HSE team or their line managers. They are informed of this process during

the induction programme offered to all new employees. At Uptown specifically, there is a monthly safety award that incentivises employees to report on such situations. Health, Safety and Environmental measures in the Coffee Centre are aligned to the requirements of an integrated management system framework consisting of ISO 9001/14001 and 45001 to enable future certification to the standards. The next step will be to investigate the practicality of implementing the system at other DMCC business units.

DMCC prescribes to international standards like the British Safety Council and the implementation of Nebosh training to mitigate risks and prevent critical hazards. Nebosh training take place once a year and require a two-hour examination at the end of the course which assesses the employees’ understanding of key H&S issues. In the UAE, health and safety requirements fall under the Federal Labour Law, which DMCC upholds along with Dubai Local Order 61 of 1991.

COVID-19 RESPONSE AT OUR MASTER COMMUNITY

Following the outbreak of the COVID-19 pandemic in early 2020, our Group Security team took the lead in implementing the requirements of the NCEMA, Dubai Supreme Committee of Crises and Disaster Management and DHA. This prompt action to introduce onsite initiatives to improve operative safety has helped us achieve high levels of health and wellbeing in the past year.

We developed a ‘Response to COVID-19 Cases’ protocol for all Tower Managers within the JLT community. Part of this protocol was to maintain and update a database to confirmed COVID-19 cases within the JLT Community. Out of a total of 90,000 occupants in JLT, we had 800 COVID-19 cases reported (<1%).

All DMCC service providers were strictly instructed to adhere to all Government regulations for COVID-19 precautionary measures as enforced within our operations. Additionally, the security service provider management teams were advised to undertake many operative contingency plans to include response plans for confirmed positive cases with COVID-19 tracing of close contacts and quarantine provisions for employees. We also emphasised the need for temperature screening and monitoring employees’ health status whilst on duty and within their accommodation units.

We also created a set of beneficial guidelines for businesses registered and operating in our Free Zone. These guidelines covered essential employment measures related to remote work, paid and unpaid leave, and temporary salary reduction. Moving forward, we will ensure that the guidelines also help businesses navigate issues around returning to normal business operations, and collecting and sharing their employees’ data for health, safety and wellbeing purposes.



OPERATIONAL EXCELLENCE

Optimise organisational policies and procedures

Material Topic	Key Performance Indicators	Actions Taken
Procurement Practices	Awareness of suppliers' sustainable practices	Initiatives postponed.
	Integration of sustainability principles in the supplier selection process	We used the 'Sustainability Questionnaire' as part of the Qualification Envelope submissions on Tejari RFQ's over AED 500,000.
	Improvement of measurement of suppliers who are procured with sustainable practices	A questionnaire was released.
Human Rights	Improvement of human rights across the supply chain	Partnered with a third-party to build Agriota to allow tea farmers or their representatives to sell crops directly by avoiding middlemen monopolies.
Emiratisation	Support Emiratisation national strategy	Added specific benefits for UAE nationals.
Gender Equality	Female representation on DMCC's newly established board	Recommendation submitted.
	Recruitment of female-led businesses to free zone	Data analysis to focus on female-led business recruitment.
	Mobilisation of commitment to WEPS and other gender-focused national priorities	Participate in the Federal Competitiveness and Statistics Authority Gender Council and will sign Equality Pledge in 2021.
Training & Development	Improvement of rate of engagement	A participation rate of 82% and achieved an overall score of 79% and more employees participated this year.

Governance	Implementation of best practices in governance	A new board was appointed.
Diversity & Inclusion	Creation of a diverse and productive culture for everyone to thrive	Reduction in nationalities from 45 (in 2019) to 41 (in 2020).
Wellbeing	Formalisation of DMMC employee wellbeing approach	The COVID-19 crisis required a complete escalation of health, hygiene, and work from home standards.
	Measurement of employee wellbeing	19 wellbeing focused webinars with calculated attendance and tracked digital wellbeing awareness campaign.
Customer Excellence	Adoption of new services to address customer needs	Introduction of our Business Support Package, employee protection insurance, and discounts on licensing services and waivers on fee for COVID.
	Customer Satisfaction	Opened a China service centre, optimised use of mobility, utilising digital channels and tools.
	Training and development of members	110 hours of training for SMEs and entrepreneurs (38 in 2019).

DIVERSITY AND INCLUSION

DMCC’s business is to connect world trade with Dubai, being international is, therefore, the core of who we are - and diversity of our workforce is a huge part of that. We have colleagues representing 41 nationalities and encourage all of them to broaden their understanding and acceptance of other cultures to ensure that we remain an inclusive employer and the free zone of choice. Our onboarding training content ‘Life at DMCC’ reflects this ethos. During the year, we had no reported incidents of any kind of discrimination.

GENDER EQUALITY

We have a total of 294 full-time employees, of which 37% are women. This proportion increases among our 48 middle management staff, where 42% are women. As a signatory to the WEPs, we continually integrate the 7 Principles to effectively address gender equality and SDG 5 as part of our corporate strategy.

EMIRATISATION

Our commitment to the UAE government’s strategy for Emiratisation is demonstrated in policies that influence UAE nationals’ recruitment and selection at DMCC. This year, our strategy to attract and retain top Emirati talent added specific benefits for UAE nationals, such as medical escort leave, full-time leave to pursue their degree, and enhanced educational assistance benefits.

PEOPLE OF DETERMINATION²⁰

DMCC partners with Emirates NBD’s ‘Together Limitless’ programme, ‘Resource Right’ and ‘Hire Right’ to mobilise talent.

50% of our new hires during the year were UAE nationals

2 people of determination work at our offices

OUR PEOPLE

	Total number of new employee hires entering employment during the reporting period	Total number of employees leaving employment during the reporting period
Total	12	38
Breakdown by gender		
Male	4	25
Female	8	13
Breakdown by age group		
Under 30 years old	7	5
30-50 years old	5	31
Over 50 years old	0	2

²⁰ HH Sheikh Mohammed bin Rashid Al Maktoum introduced the term People of Determination to describe people who were formally called special needs as outlined in the Federal Law No. 29 of 2006 Concerning the Rights of People with Special Needs.

The total number of DMCC temporary employees is 65 (36 male and 29 female).

All of our employees are based in the UAE with a new employee rate of 4.08%. Data related to DMCC human resources is derived from an Oracle enterprise solution as part of our efforts to ensure all core operations are digitalised.

TRAINING AND DEVELOPMENT

Our business is constantly evolving with the changing economic landscape and varying client demands. Therefore, DMCC invests in staff skills, so they succeed now and in the future.

We offer significant learning and growth opportunities for our colleagues. We ensured that online learning would be available to all employees anytime anywhere through any device during the year. In 2020, there was a strong focus on trainings for our customer-

Employees are categorised as follows:

- Executive and senior management: Grade 20 and above
- Middle management: Grade 18-19
- All staff (professional, operational, and administrative): Grade 17 and below

facing employees, and employees in director levels.

We also organised trainings for COVID-19 precautionary measures and protocol guidance for all our colleagues called the 'Employee Health and Wellness' course. Furthermore, we introduced content related to the International Public Affairs and Sustainability Department as part of our new joiners' orientation pack.

OUR KEY DATA POINTS TOWARDS TRAINING AND DEVELOPMENT IN 2020 INCLUDE:

- 3,533 online learning hours, including customer service staff engagement
- 12 hours of training per employee (12.3 on average among female employees, 11.8 on average among male employees)
- 100% of our full-time employees received a regular performance review
- A total of 21 employees received career development plans, and a total of 7 received individual development plans
- Two directors enrolled in external training for Dubai Expert organised by Dubai Future Foundation.

Our Senior HSE Manager continues to update his CDP with IOSH to maintain his Chartership.

Total Number of Training Hours	3532.6
Breakdown by gender	
Male	2,190.3
Female	1,342.4

Average hours of training that the organisation's employees have undertaken during the reporting period	12.0
Breakdown by gender	
Male	11.8
Female	12.3
Breakdown by employee category	
Executive & Senior Management	669.1
Middle Management	760.8
Staff (professional, operational and administrative)	2,102.6

Total number of employees received a regular performance and career development review during the reporting period	294 (100%)	Executive & Senior Management	Middle Management	All staff
Breakdown by gender				
Male	185 (63%)	33	28	124
Female	109 (37%)	14	20	75
Breakdown by age group				
Under 30 years old	33 (11%)	0	1	32
30-50 years old	238 (79%)	38	43	157
Over 50 years old	23 (10%)	10	4	9

WELLBEING

The COVID-19 pandemic has resulted in radical changes to the way we work, impacting people's physical and mental wellbeing around the world. Last year, through a wide

range of employee-focused initiatives, our Group Security at DMCC worked hard to ensure all our colleagues' health and safety. These included physical safety precautions to

maintain safe social distancing in the workplace. We installed physical protective screens for customer services activities, as well as thermal temperature cameras. Additionally, we installed several precautionary signs and hand-sterilisation units across our office.

To ensure business continuity while maintaining all safety protocols, we identified critical business units (e.g. our counter services and contact centre) that would require to work from the office; remaining staff worked from home. We ceased several activities such as visits to our office by non-staff members, internal and international business travel and events,

physical meetings, and employee movements between departments.

In addition to the COVID-19 specific initiatives, we offer a range of benefits to our employees to enhance their wellness and work-life balance. All our full-time colleagues have access to life insurance, compassionate leave, charity leave, marriage leave, parental leave and study leave. Our temporary staff are entitled to benefits by their direct employers following the provisions of the UAE Labour Law; these include: annual paid leave, sick leave, health insurance, flight allowance, and maternity leave.

IN 2020, OUR KEY ACHIEVEMENTS TOWARD WELLBEING AND EMPLOYEE HEALTH & SAFETY INCLUDE:



- 15 webinars on wellness attended by a total of 1,351 attendees.
- Facilitating the purchase of technology and office equipment required for remote work and ensuring DMCC's IT infrastructure enabled a secure and smooth remote work experience for all colleagues.
- Encouraging everyone to utilise online platforms to continue engaging with colleagues and clients.
- Developing strict protocols for personal international travel of our staff.
- 89% of colleagues that availed parental leave returned to work at the end of their leave period.

Total number of employees that were entitled to parental leave	294
Breakdown by Gender	
Male	185
Female	109

Total number of employees that took parental leave	15
Breakdown by Gender	
Male	5
Female	10
Total number of employees that returned to work in the reporting period after parental leave ended	14
Breakdown by Gender	
Male	5
Female	9
Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work	8
Breakdown by Gender	
Male	7
Female	1
Return to work and retention rates of employees that took parental leave	89%
Breakdown by Gender	
Male	78%
Female	11%

CUSTOMER EXCELLENCE

We respond to the growing demand from our customers for better opportunities for trade, free zone services, and community living. We are working continuously towards improving our services and customer relationships; this is the foundation of our commitment to customer excellence. To do so, we have engaged our customers in the DMCC materiality assessment process to ensure their viewpoints are considered when defining our priorities. We also have an online customer feedback mechanism allowing for anyone to offer suggestions digitally and anonymously. One of the key metrics we use to measure success is the growth rate of business registrations and the number of visitors and residents in the Master Community. The popularity of our properties is an indication that we are meeting the needs of this priority stakeholder. In 2020, we continued to prioritise SME customers. We invested in building their capacity in several areas to expand their business strengths, such as insights on technology and innovation, digital marketing and e-commerce, financials and cash flow management, employment law, updates on VAT rules and regulations and more. We opened a China Service Centre with a dedicated mandarin speaking executive to provide support to Chinese business owners looking to setup and do business in the UAE. Soon after, we setup a representative office for DMCC in Shenzhen, China, to provide the same support offering full-fledged services at the clients' convenience.

DMCC's value-added products and services are boosted by the frequent introduction of innovative and customer-centric processes in our operations. This year, we also introduced an employee protection insurance to protect business owners from unpaid salaries and disruption of end-of-service benefits in case of default by employers. We also enhanced partnerships with numerous banks in the UAE to serve our customers better.

During the year, to assist businesses with the economic impact of COVID-19, DMCC launched a Business Support Package, the largest ever commercial initiative of its kind. This included discounts on licensing services, waivers on fees and rent, and incentives. For example, the new company setup package was heavily discounted to 50% from the original price. We also updated our Help Centre with a range of self-service information, including how-to guides, videos, and FAQs. To strengthen our digital services, DMCC now offers the facility of online meetings with our service centre, registration centre, and the mediation and legal clinic.

In addition, we signed a partnership with Emirates NBD, Dubai's major bank, offering 0% interest monthly installments on all DMCC fees if customers paid using ENBD credit cards. Similarly, we signed an MoU with Mashreq bank to facilitate bank account openings for our member companies. We also launched a new Employee Protection Insurance programme, by Dubai Insurance, which provides cost-saving and cashflow for member companies whilst giving greater protection for employees.

Towards the end of 2020, we officially opened our representative office in Tel Aviv, Israel. Based in the Israeli Diamond Exchange (IDE) headquarters, this new office will support Israeli businesses, from all industries and sectors, interested in setting up a presence in Dubai and DMCC's Free Zone. The opening followed a landmark collaboration agreement signed between the Dubai Diamond Exchange and the Israel Diamond Exchange.

An initiative we are particularly proud of is offering a financial incentive between 10% to 30% to businesses within our free zone that join the UN Global Compact. DMCC is committed to responsible business and as part of its sustainability strategy is intent on using its platform for greater good.

ECONOMIC PERFORMANCE

With innovative products and services that our customers increasingly value, our economic performance in 2020 has contributed to DMCC's reputation as one of the world's leading free zones. Our economic performance is critical as it directly impacts Dubai's overall GDP, between our own revenue and the revenue of those businesses residing in the free zone. The topic boundary only covers the revenue achieved through DMCC's direct activities, for instance, the free zone and our real estate projects. Revenue growth is a key metric by which we calculate progress on this topic.

With the help of a very positive retention rate and an increase in the number of companies joining DMCC, our financial performance significantly improved in 2020. A total of 2,025 new companies joined our free zone, despite the challenges posed by COVID-19. This is the highest number of new registrations at DMCC in the last five years. We remain committed to exceeding this number in 2021 and have established internal

targets to achieve this. To do so, we are constantly reviewing and introducing new programmes for entrepreneurs such as our social impact programme, business support packages and trainings. These programmes aim to attract and retain businesses to the free zone. Additionally, there are continuous upgrades being made to the Master Community so it remains a favorable residential and recreational area. These include new restaurants, improvements in landscaping and nurturing a sense of community through social media channels. The establishment of Uptown is a key example of a development project that will attract more residents to the area and enhance economic performance.

Integral to this record-breaking growth was the 19 virtual roadshow webinars we organised to engage with key international markets such as China, Israel, Russia, Switzerland, Germany, Angola, South America, Spain, Turkey, Ukraine and the United Kingdom.

DMCC'S KEY ACHIEVEMENTS TOWARDS ECONOMIC PERFORMANCE AND CUSTOMER EXCELLENCE IN 2020:



- Our Business Support Package gained interest from companies in 149 countries.
- 2,025 new companies joined DMCC's free zone.
- 110 hours of training for SMEs and entrepreneurs (38 in 2019).
- Introduced a Voice of the Customer (VoC) programme to analyse and address customer's issues.
- Secured how our customers digitally manage and submit their documents.
- Increased imports from Israel by double; from 20 to 40 in one year.



RESPONSIBLE BUSINESS ECOSYSTEM

Create a resilient foundation for positive impact

Material Topic	Key Performance Indicators	Actions Taken
Digitalisation	Implementation support of Dubai's Smart City strategy	We migrated more than 75% of our hosted Oracle ERP to a cloud version.
Customer Privacy	Mitigation of security incidents	During the year, there were no reported identified leaks, thefts, or losses of customer data.
Data Protection & Cybersecurity	Enhancement of the digital environment	We have closed 93% of all the customer privacy gaps identified by the Dubai Electronic Security Centre (DESC). We applied for the ISO 27001 certification for Information Security Management.
Innovation	Development of unique solutions to commodities trading	We partnered with a third-party to build Agriota to allow tea farmers or their representatives to sell crops directly by avoiding middlemen monopolies.
	Integration of R&D activities across all pillars of DMCC	R&D is currently not centralised and is managed by each department separately.
Regulatory Compliance	Improvement of and facilitate stakeholder understanding of regulations	Provided Anti-Money Laundering/ Combating the Financing of Terrorism (AML/CFT) training sessions for all staff and management. Arranged three AML/CFT webinars for our member companies in conjunction with the UAE Ministry of Economy.

Responsible Sourcing Ecosystem	Engagement with international partners in supporting responsible and sustainable sourcing	Continued our engagement with the Kimberley Process Certification Scheme, supporting the government with country level gold standards, and launched Agriota platform supporting local farmers.
Anticorruption	Zero incidents of fraudulent behaviour sourcing	Achieved zero incidents of fraudulent behaviour.

DIGITALISATION, DATA PROTECTION, CYBERSECURITY AND CUSTOMER PRIVACY

Our mission is to prioritise and innovate in the digitalisation of our services and internal processes so that we can offer our customers excellent service, improve employee satisfaction, and enhance our overall value proposition to stakeholders. Our record-breaking number of company registrations was largely due to the investments made in digitalisation, with a particular focus on business intelligence and digitalising of all customer-facing processes to make them 100% paperless. Customers are now able to register their businesses remotely. Furthermore, we have introduced 50 additional process enhancements specifically targeted to customers. Through newly introduced business intelligence solutions, the executive management has visibility on performance and efficiency in real time.

In 2020, DMCC migrated more than 75% of its hosted Oracle ERP to a cloud version – this

makes it one of the few government entities to have done so. To support our employees during the COVID-19 lockdown, we provided access to tools to enable them to work from anywhere. This included laptops for 96% of the workforce, adoption of Office 365, Exchange services, and MS Teams. Furthermore, the free zone deployed robots to minimise human interaction and facilitate safe engagement with our customers.

Digitalisation is one of the primary measures DMCC has adopted to improve internal processes and increase customer satisfaction. We do our utmost to protect our customers' data along with DMCC networks and office data. This level of security requires continuous vigilance and rapid adaptability to counter any potential attacks. During the year, there were no reported identified leaks, thefts, or losses of customer data.

IN 2020, WE IMPLEMENTED THESE INITIATIVES TO IMPROVE THE SECURITY OF OUR INFRASTRUCTURE AND CUSTOMERS:



- We closed 93% of all the customer privacy gaps identified by DESC.
- We applied for the ISO 27001 certification for Information Security Management.
- We created a digital information security course that is mandatory for all employees to complete to safeguard office data.
- We developed a Data Classification policy and process to implement classification across the organisation.

ANTICORRUPTION AND REGULATORY COMPLIANCE

We strive to create a business culture where compliance and anti-corruption are self-evident for all DMCC employees and member companies. It is an integral part of our commitment to the UN Global Compact. We also recognise that we are in a position to influence our members and serve as a role model to the larger community.

In 2020, new UAE Economic Substance Regulations (ESR) came into force that require onshore and free zone companies to maintain and demonstrate an adequate economic presence in the UAE relative to the activities they undertake. We welcomed these changes and took steps to ensure compliance by informing relevant companies about these requirements and verifying them.

Due to COVID-19, we were only able to conduct remote compliance inspections

and verifications. Remote compliance inspections opened up a new opportunity because now DMCC could engage low-risk licences not involved in the process previously.

WE FURTHER STRENGTHENED THE EFFECTIVENESS OF COMPLIANCE IN 2020 BY:



- Playing an active role in the UAE National Risk Assessment and implementation roadmap to enhance the country's Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT) capabilities.
- Providing AML/CFT training sessions for all staff and management.
- Arranging three AML/CFT webinars for member companies in conjunction with the UAE Ministry of Economy.
- Playing an active role with the UAE Ministry of Economy in the supervision of member companies that fall into the Designated Non-Financial Businesses and Professions (DNFBP) sectors such as dealers in precious metals and precious stones, Real estate agents, and Company service providers.

During the year, and in light of the challenges brought about by the pandemic, DMCC did not impose any fines to DMCC member companies. Nevertheless, we were not willing to compromise on ethical best practices, and member companies were sanctioned for the non-provision of information, and non-compliance with DMCC free zone rules and regulations, including late provisions of Audited Financial Statements. We imposed approximately 900 sanctions throughout 2020.

DMCC's legal policy and procedures issued at the start of 2020 introduced the ability

to track and record all active, pending and threatened litigation. However, to maintain client/attorney privilege, we are not authorised to share details of specific current pending, threatened or active litigation at any given time. Operations were not assessed for risk.

We have a zero-tolerance policy for corruption, fraud, bribery and all other forms of misconduct. This policy applies to our processes, as well as to our member companies. We actively and promptly investigate any alleged illegal activity and take appropriate disciplinary action where required.

HUMAN RIGHTS, RESPONSIBLE SOURCING, AND PROCUREMENT PRACTICES

The commodities we trade in – tea, coffee, diamonds and gold – have traditionally been beset with many human and labour rights violations. Therefore, we are strictly committed to respecting human rights as articulated by the UNGC and the UN

Guiding Principles on Business and Human Rights. Our commitment to human rights is integrated into our business ecosystem.

Millions of workers mining gold and diamonds worldwide suffer immensely because of human rights abuses in the supply chain. Our partnership with the Kimberley Process Certification Scheme, a system of export and import controls for

rough diamonds, seeks to address this issue by preventing the flow of conflict diamonds.

DMCC's commitment to human rights is anchored in its adherence with UAE Labour laws, its HR Policies and Procedures and Code of Conduct. The DMCC corporate whistleblowing policy and grievance procedure enable employees to file grievances and concerns without risk of reprisal.

Dubai is responsible for about 80% of the total UAE gold imports and exports. Artisanal and small-scale gold mining (ASGM) is often characterised as a conflict mining activity. Therefore, we have adopted responsible sourcing regulatory standards, such as the DMCC Practical Guidance for Market Participants in the Gold and Precious Metals Industry and the DMCC Rules for Risk-Based Due Diligence in the Gold and Precious Metals Supply Chain to avoid human rights violations in the supply chain. These standards are to be followed by member companies and requires them to designate a supply chain officer and conduct audits of its suppliers. Miners in Africa, Asia and South America are at the greatest risk of such violations. Gold has been identified as a priority sector for the UAE and the government is leveraging DMCC as a knowledge centre for a country-level gold standard.

We also implement practical measures aligned with international standards to assure a compliant and violation-free supply chain for the tea sector and the coffee industry. We partnered with a third-party to build an online platform to allow tea farmers or their representatives to sell crops directly by avoiding middlemen monopolies during the year. The platform, 'Agriota', will enable farmers in India to sell their crops anywhere globally, thus

increasing their geographical reach and fetch them better prices for their produce.

To further support our trade ecosystem through responsible procurement practices, we executed the following steps in 2020. These initiatives were extended to all our suppliers including those in the construction, technology and marketing sectors. The majority of DMCC suppliers are based in the UAE and are considered local suppliers:

- We continued the use of the 'Sustainability Questionnaire' as part of the Qualification Envelope submissions on Tejari RFQ's over AED 500,000. The questionnaire covers aspects such as staff safety, diversity & inclusion, human rights, labour rights, GHG emissions, supply chain management, community investing and sustainability reporting.
- We reviewed all contracts with vendors for temporary staff through our Contracting and Procurement department to ensure that all awarded vendors meet the UAE's labour law requirements for wages. Furthermore, all staff recruited at the same level are paid equally and fairly as per the market rate.

- Questionnaires were sent to 60 suppliers to understand their commitment towards improving their social and environmental impacts. None of these were identified as having significant actual and potential adverse social and environmental effects however an official assessment is required to gain a more accurate view of human rights conditions. DMCC will develop a more robust approach next year to better address potential human rights risks in the supply chain. We aim to have the majority of our suppliers engage in the questionnaire next year. In addition, we will analyse results and integrate them into the selection process in time.

- We implemented a fully automated contract approval workflow process, removing any need for paper hard copies. We support the local economy, with 96% of our suppliers having presence in the UAE with all transactions being in United Arab Emirates Dirham. Suppliers primarily represent construction, technology and
- marketing services and products. Suppliers undergo a rigorous procurement evaluation before selection overseen by the Contracts and Procurement department, who are also responsible for the distribution and follow-up of the sustainability questionnaire. All suppliers interact with us through the supplier portal.

Local suppliers	473,163,492.07	96%
International suppliers	22,131,748.96	4%
Yr 2020 Total for Local & International Suppliers Payment	495,295,241.03	

The supplier code of conduct which is required to be signed by all suppliers informs them to follow the UN Global Compact 10 Principles and UN Guiding Principles on Business and Human Rights in their business operations.

Next year, we will evaluate the quantitative results of the questionnaire and develop mechanisms for stakeholder feedback. Planned training and awareness sessions for the questionnaire were postponed due to the pandemic.

SOCIAL IMPACT

Our priority is to empower people across the value chain through opportunities in trade and business. Community as a material topic is critical for DMCC, it is only if businesses, residents and stakeholders in the value chain are thriving that we will continue to grow as an entity. The topic boundary specifically evaluates DMCC’s impact on the wider UAE entrepreneurial ecosystem and artisanal miners that sit within the value chain. In the case of both these stakeholders, DMCC does

not have a direct relationship but embraces a sense of responsibility to their protection and prosperity.

In 2020, we built on our social impact policy, whereby we commit to donate 0.5% of the company’s net profit of the previous year, by developing a social impact plan that centres around: Entrepreneurship, Vulnerable Communities, and Gender Equality. DMCC’s social impact plan will help operationalise

our policy so that funds distributed align with DMCC’s business strengths, areas of interest, and the creation of maximum impact. Any organisation that receives monetary or in-kind funds is required to provide periodic reporting which should include target tracking and KPI management We are in regular communication with our partners working collaboratively with them to improve the projects that DMCC supports.

Currently, we have two essential programmes that we are supporting with our Social Impact Fund:

1. Diamond Development Initiative Programme, a non-profit established under the Kimberly Process: DDI has merged with Resolve, a non-profit developing sustainable solutions for the world’s biggest challenges. Programmes under this merger will provide artisanal diamond miners with a pathway out of poverty. The programme restores post-mined land, supports entrepreneurship and livelihoods. Resolve works hand in hand with the government to provide soil, water and enable biodiversity benefits to these areas. In addition, they work with the local community to identify sites for the projects and receive programme feedback. We provided funding to the project and hosted consultations on programme development.

During the year, funds were used to support various programmes in the Democratic Republic of the Congo (DRC), Sierra Leone, and other countries. The funds provided access to education for 111 secondary school youth from remote mining communities in the DRC. The funds also supported DDI@RESOLVE’s Peace Diamonds Restoration Initiative to rehabilitate 60 abandoned mine pits for improved community health and public safety. Furthermore, the DMCC

funds helped support Miner Cooperatives, including developing the Maendeleo Diamond Standard (MDS) strategy and Action Plan for DRC.

2. Evolvin Women (EW): A female-led social enterprise that connects unemployed women based in rural Africa to skill-development placements in the UAE within the hospitality industry. We provide Evolvin Women with a complimentary free zone license, office space, and mentoring opportunities.

During the year, our support to EW allowed them to expand their business to Zambia and Ethiopia to work with aspiring entrepreneurs/social entrepreneurs in these countries. DMCC’s support also allowed EW to offer market access to farmers in Africa. In the coming year, EW aims to support women in developing their social enterprises, focusing on engaging with women coffee farmers.

Both these partnerships implement DMCC’s social impact plan to progress gender equality, protect vulnerable communities, and foster entrepreneurship.



IMPACT BOUNDARIES TABLE

In the context of this report, material topics are those that reflect DMCC's significant economic, environmental and social impacts, or substantively influence the assessments and decisions of stakeholders. DMCC has used the term 'impact boundary' to describe the boundaries of each material topic following GRI's reporting principles and management approach. The materiality matrix reflects 24 material topics. The report only shares quantitative data on DMCC's areas of direct control. However, we recognise our influence on our identified material topics beyond our direct control as indicated in the below table.

S. No.	Material Topic	Impact Boundaries	Corresponding GRI Topic and Disclosures
1	Community	Within & outside the organisation	GRI 413: Local Communities 2016 <ul style="list-style-type: none">• 413-1 Operations with local community engagement, impact assessments, and development programmes.
2	Regulatory Compliance	Within & outside the organisation	GRI 419: Socioeconomic Compliance 2016 <ul style="list-style-type: none">• 419-1 Non-compliance with laws and regulations in the social and economic area. GRI 205: Anti-corruption 2016 <ul style="list-style-type: none">• 205-1 Operations assessed for risks related to corruption.• 205-2 Communication and training about anti-corruption policies and procedures.
3	Digitalisation	Within the organisation	—

4	Training & Development	Within the organisation	GRI 404: Training and Education 2016 <ul style="list-style-type: none">• 404-1 Average hours of training per year per employee.• 404-2 Programmes for upgrading employee skills and transition assistance programmes.• 404-3 Percentage of employees receiving regular performance and career development reviews.
5	Wellbeing	Within the organisation	—
6	Anticorruption	Within & outside the organisation	GRI 205: Anti-corruption 2016 <ul style="list-style-type: none">• 205-1 Operations assessed for risks related to corruption.• 205-2 Communication and training about anti-corruption policies and procedures.• 205-3 Confirmed incidents of corruption and actions taken.
7	Human Rights	Within & outside the organisation	GRI 407: Freedom of Association and Collective Bargaining 2016 <ul style="list-style-type: none">• 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk. GRI 408: Child Labor 2016 <ul style="list-style-type: none">• 408-1 Operations and suppliers at significant risk for incidents of child labour. GRI 409: Forced or Compulsory Labor 2016 <ul style="list-style-type: none">• 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour.

			<p>GRI 412: Human Rights Assessment 2016</p> <ul style="list-style-type: none"> • 412-1 Operations that have been subject to human rights reviews or impact assessments. • 412-2 Employee training on human rights policies and procedures.
8	Responsible Sourcing	Outside the organisation	—
9	Customer Excellence	Within & outside the organisation	—
10	Procurement Practices	Within & outside the organisation	<p>GRI 204: Procurement Practices 2016</p> <ul style="list-style-type: none"> • 204-1 Proportion of spending on local suppliers.
11	Infrastructure	Within & outside the organisation	—
12	Customer Privacy	Within & outside the organisation	<p>GRI 418: Customer Privacy 2016</p> <ul style="list-style-type: none"> • 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data.
13	Data Protection & Cyber Security	Within & outside the organisation	—
14	Occupational Health & Safety	Within the organisation	<p>GRI 403: Occupational Health and Safety 2018</p> <ul style="list-style-type: none"> • 403-5 Worker training on occupational health and safety. • 403-9 Work related injuries.

15	Economic Performance	Within & outside the organisation	<p>GRI 201: Economic Performance</p> <ul style="list-style-type: none"> • Disclosure 201-1 Direct economic value generated and distributed.
16	Emiratisation	Within & outside the organisation	—
17	Gender Equality	Within the organisation	—
18	Innovation	Within & outside the organisation	—
19	Diversity & Inclusion	Within the organisation	<p>GRI 102: General Disclosures 2016</p> <ul style="list-style-type: none"> • 102-8 Information on employees and other workers. <p>GRI 401: Employment 2016</p> <ul style="list-style-type: none"> • 401-1 New employee hires and employee turnover. <p>GRI 405: Diversity and Equal Opportunity 2016</p> <ul style="list-style-type: none"> • 405-1 Diversity of governance bodies and employees. <p>GRI 406: Nondiscrimination 2016</p> <ul style="list-style-type: none"> • 406-1 Incidents of discrimination and corrective actions taken.
20	Green Buildings	Within & outside the organisation	—
21	Water Use	Within & outside the organisation	<p>GRI 303: Water and effluents 2018</p> <ul style="list-style-type: none"> • 303-5 Water consumption.

22	Waste Management and Reduction	Within & outside the organisation	GRI 306: Effluents and Waste 2016 • 306-2 Waste by type and disposal method.
23	Energy	Within & outside the organisation	GRI 302: Energy 2016 • 302-1 Energy consumption within the organization.
24	Governance & Succession Planning	Within the organisation	—

