# **DMCC**

# 2023 SUSTAINABILITY REPORT

Shaping the Future of Trade







21

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# ABOUT THIS REPORT

We, DMCC, developed this report prioritising topics identified in collaboration with our stakeholders by understanding risks and opportunities, negative and positive, potential, and actual impacts related to environmental, social, and economic aspects relevant to our operational activities and how we manage them.

Our commitment to continuous sustainability and transparency aims to strengthen our influence and impact as a globally recognised hub for global commodities trade and the fastest growing and largest free economic zone in the United Arab Emirates.

#### **OUR REPORTING STANDARDS**

DMCC aligns with international sustainability standards to ensure best practices and reporting quality. This report follows the Global Reporting Initiative (GRI) Standards, covering stakeholder engagement, materiality, completeness, and accuracy. This report has been prepared in accordance with the 2021 GRI Standards and is available on the GRI online disclosure database and DMCC's website.

Since August 2017, we've been United Nations Global Compact (UNGC) signatories, and this report complies with UN Global Compact Advanced Level requirements, serving as our Communication on Progress (CoP). The report is also available on the UN Global Compact website. We are also a signatory of the UN Women Empowerment Principles (WEPs) and an active advocate of the United Nations Sustainable Development Goal (SDGs) 5 on gender quality. We are committed to progress on multiple SDGs and have developed a strategic framework which can be viewed in the SDG index (Page 15). The GRI content index can be found at www.dmcc.ae/ sustainability.

#### **RESTATEMENT OF INFORMATION**

There have been no restatements of information in this year's report. All data presented is consistent with previous reports, with no corrections or adjustments required.

#### STRUCTURE AND MATERIALITY

The layout of the report mirrors our sustainability strategy and illustrates how we act, measure, and manage it within our codependent business activities daily. Each section of the report covers material topics under the umbrella of our three sustainability pillars:

- Sustainable City
- Operational Excellence
- Responsible Business Ecosystem

We've linked each material topic (page 20) to our three key pillars. These 12 topics were identified and depicted following materiality principles. The material topics are further defined within the report and supported with relevant disclosures. All material topics are supported with comprehensive data and the continuity of data over the last two to three years variables based on the disclosures added as per GRI Universal Standards 2021.

#### **SCOPE OF ENGAGEMENT**

This annual report covers our environmental, social, and economic performance in the last financial year, ranging from 1 January 2023 to 31 December 2023. The reporting period and the scope of this report are aligned with the DMCC's annual financial report. It 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 Jewellery 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 offered to member companies, retailers, developers, and residents of the Master Community.

In compliance with GRI Universal Standards, our scope of engagement expanded to all business activities we impact regardless of direct or indirect control. We categorised our business relationships across our value chain and classified them based on proximity and influence of impact for organisational purposes. All levels of business relationships, despite their degree of proximity and influence, were engaged in the process of collecting feedback and data.

#### **ASSURANCE**

E&Y provided a limited independent assurance under ISAE 3000 (Revised) on preparing this report in accordance with the GRI Standards. E&Y is independent of DMCC at the point that the report is issued. The outcomes of the assurance and relevant recommendations are presented in the management report, which is reviewed at the senior level and circulated to data owners. As a Dubai government entity, we are not required to conduct assurance of this Report. However, we believe transparency is critical, and E&Y's recommendations help us improve. For the scope of work and observations, please refer to the independent limited Assurance report shown on (page 6) 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.

Assurance Statement Assurance Statement

# **ASSURANCE STATEMENT**

#### **SCOPE**

We have been engaged by Dubai Multi Commodities Centre Authority (DMCC) to perform a 'limited assurance engagement,' as defined by International Standards on Assurance Engagements, here after referred to as the engagement, to report on DMCC's Greenhouse Gas Emissions - Scopes 1 & 2 and DMCC's declaration of preparing the 2023 Sustainability Report in accordance with the Global Reporting Initiative (GRI) (the "Subject Matter") contained in DMCC's (the "Company's") 2023 Sustainability Report for the year ended December 31 (the "Report").

#### **CRITERIA APPLIED BY DMCC**

In preparing the Subject Matter, DMCC applied the Global Reporting Initiative (GRI) 2021 Universal Standards (Criteria).

#### **DMCC'S RESPONSIBILITIES**

DMCC's management is responsible for selecting the Criteria, and for presenting the Greenhouse Gas Emissions - Scopes 1 & 2 and DMCC's declaration of preparing the 2023 Sustainability Report in accordance with the GRI, based on that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

#### **EY'S RESPONSIBILITIES**

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial

Information ('ISAE 3000 (Revised)'), and the terms of reference for this engagement as agreed with DMCC on December 9, 2024. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

#### **OUR INDEPENDENCE AND QUALITY MANAGEMENT**

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

#### **DESCRIPTION OF PROCEDURES PERFORMED**

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. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Greenhouse Gas Emissions - Scopes 1 & 2 and DMCC's declaration of preparing the 2023 Sustainability Report in accordance with the GRI and related information and applying analytical and other appropriate procedures.

#### **OUR PROCEDURES INCLUDED:**

- Conducted interviews with personnel to understand the business and reporting process
- · Conducted interviews with key personnel to understand the process for collecting, collating and reporting the subject matter during the reporting period
- Checked that the calculation criteria have been correctly applied in accordance with the methodologies outlined in the Criteria
- Undertook analytical procedures of the data and made inquiries of management to obtain explanations for any significant differences we identified

- Identified and testing assumptions supporting calculations
- Tested, on a sample basis, underlying source information to check the accuracy of the data

We also performed such other procedures as we considered necessary in the circumstances.

#### CONCLUSION

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the Greenhouse Gas Emissions - Scopes 1 & 2 and DMCC's declaration of preparing the 2023 Sustainability Report in accordance with the GRI for the year ended December 31st, 2023, in order for it to be in accordance with the Criteria.

#### **RESTRICTED USE**

This report is intended solely for the information and use of DMCC the publication of its 2023 Sustainability report and is not intended to be and should not be used by anyone other than those specified parties

**Anthony O'Sullivan** 

December 20, 2024 Dubai, UAE

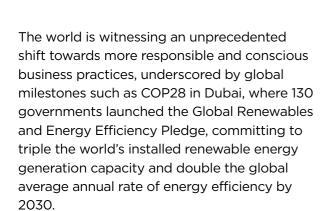
#### Appendix A - Data Table: DMCC GHG Emissions (Scope 1 & 2) for FY2023

Sr.	KPI	GRI reference	Reported Value	Unit
1	Direct (Scope 1) GHG emissions	305-1	569.57	tCO2e
2	Energy Indirect (Scope 2) GHG emissions	305-2	10,592.32	tCO2e

Feryal Ahmadi

COO.

**DMCC** 



**EXECUTIVE STATEMENT** 

**Executive Statement** 

Against these developments, we must recognise that international trade and climate change are inextricably linked. Whilst trade's contribution to global emissions is relatively small compared to other industry sectors, it will be key to catalysing the green transition by facilitating the spread of renewable energies and green technologies crucial to meeting net-zero targets around the world.

As the world commits to a greener future, trade hubs and international businwess districts will have an increasingly vital role to play. At DMCC we are alive to our responsibility and recognise the importance of aligning our operations with emerging global standards.

Because DMCC is more than just a facilitator of trade; we are a catalyst for change. With

almost 25,000 members, DMCC represents 15% of Dubai's foreign direct investment and 7% of its GDP. These values are a significant indicator of our economic contribution.

Our rapidly expanding community represents both a responsibility and an opportunity for us to further embed sustainability into the core of our operations for the benefit of our business, our planet, and our future.

This year also marked another significant milestone with the completion of Uptown Tower – DMCC's new headquarters and Dubai's next world-class smart and sustainable district. In line with DMCC's commitment to sustainability, Uptown Tower was built using best-in-class sustainable building practices, a commitment exemplified by the use of a 540 kWp solar panel system – the largest in history for a construction site – which reduced the carbon footprint of the construction by over 50% and energy costs by 20%. These innovations were recognised when Uptown Tower was awarded LEED Gold status in the global sustainability framework and Dubai Green Building Regulation.

We continue to invest in the enhancement of our Jumeirah Lakes Towers (JLT) district. Our efforts in JLT are designed to ensure that this vibrant community remains a model of urban sustainability; from improving green spaces to enhancing the quality of life for residents and visitors, we are committed to making JLT a leading mixed-use community where people can thrive professionally and personally.

**Ahmed Bin Sulayem** 

DMCC

Executive Chairman and CEO.

Our decarbonisation strategy is a cornerstone of DMCC's commitment to achieve net zero in our operations. Aligned with the UAE's 2050 Net Zero Strategy, we have worked diligently throughout 2023 to establish a comprehensive baseline of our Scope 1, 2, and 3 emissions in order to progress our contribution to mitigating climate change and climate impact. To enhance the credibility and accuracy of our data, we have engaged independent third-party auditors to verify our Scope 1 and 2 emissions, demonstrating our commitment to transparency and accountability.

Of course, sustainability goes beyond data collection. In 2024, we aim to roll out a robust Greenhouse Gas (GHG) management system, which will serve as the backbone of our efforts to reduce emissions and achieve carbon neutrality. We will also introduce comprehensive training programmes to ensure that more DMCC employees are carbon literate. By fostering a culture of environmental

awareness within DMCC, we aim to empower our team to contribute meaningfully to our sustainability goals.

Another significant future objective for us is the launch of the DMCC Sustainability Hub. This new platform is our commitment to driving positive change and supporting the UAE's net-zero ambitions. By serving as an ecosystem for sustainable innovation, the Sustainability Hub will be key in providing our members with access to cutting-edge tools, expert guidance, and collaborative opportunities to integrate sustainability into every aspect of their operations. Through the Sustainability Hub, we would like to empower businesses within DMCC to lead the way in sustainable trade and enterprise, making meaningful contributions to mitigating climate change and creating a positive impact across the value chain.

As we look to the future, DMCC will continue to set the benchmark for sustainability across our communities. We embrace the challenges that come with this commitment. By embedding sustainability into the fabric of our business, we can create lasting value for our stakeholders and contribute to global efforts to build a more sustainable world.

# **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-ofthe-art facilities alongside a wide range of value-added products and services.

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.



#### **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 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 eco-friendly lifestyle, recycling, bike-sharing, and tips to live a more sustainable lifestyle.





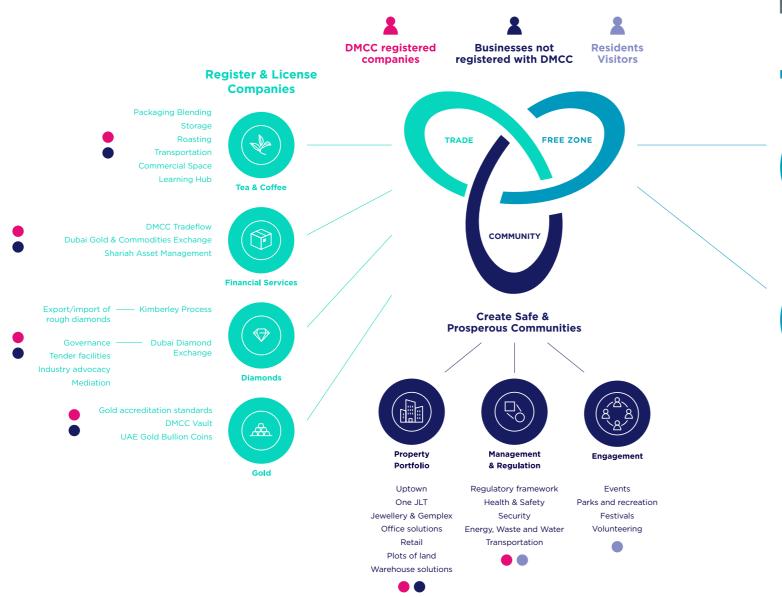




#### **OUR CUSTOMERS AND SERVICES**

DMCC's value chain and its services are complex. Still, through identifying and prioritising our stakeholders, which are our business owners, residents, and visitors, we can provide a multifunctional ecosystem to serve all their business needs and more. The diagram of our operations depicts how we interact and impact our stakeholders through our services.

We manage a business community of over 25,000 member companies from 190 countries that employ over 60,000 people. Through our fully integrated services, business owners can register their business licenses within the free zone and enjoy our value-added services depending on their needs. For example, we cater to the coffee, tea, and precious metals sectors by granting access to our network, education, and regulatory guidance for these commodity activities. Residents, visitors, and employees of DMCC registered businesses can enjoy the various community engagement opportunities in a secure and pleasant setting.





Sustainability at DMCC Stakeholder Engagement

# **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.	DMMC 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**

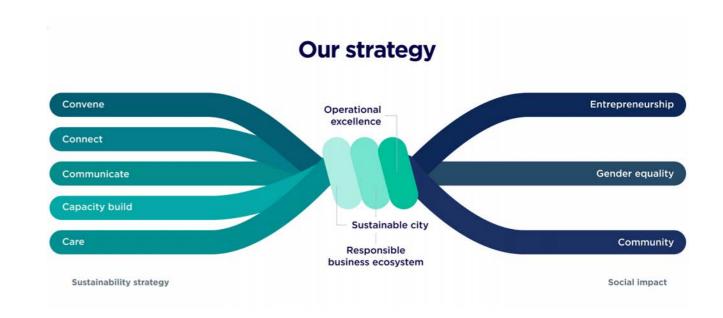
Customers	Communities	Colleagues	Suppliers	Institutions & Policy Makers	Industry Peers	NGOs and Community Partners
Help customers grow their business by offering capacity building initiatives, financial services, infrastructure and networking opportunities while supporting them in their sustainability 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** AT DMCC

#### **OUR STRATEGY**

We established our sustainability strategy in 2019 when we issued our 'Sustainability Guidelines' with a 'Sustainability Policy Statement. These guidelines and policies reflect our commitment to aligning our business operations with international sustainability frameworks and best practices. Our policy statement can be found on our website.

The framework pictured reflects DMCC's 5C management approach to sustainability, divided into three pillars: Sustainable City, Responsible Business Ecosystem, and Operational Excellence. The 5C's: Convene, Connect, Communicate, Capacity Build, and Care is how we lead our engagements with our stakeholders. This method of collaboration allows us to incorporate feedback and improvements towards shaping a sustainable future of trade, our supply chain, finance, and infrastructure.





















Sustainability at DMCC Our Materiality Approach

The three pillars are a result of a self-evaluation conducted in 2019 to understand what sustainability means for DMCC and how it can best influence the environment and the community where it operates through its business activities. Since 2019, we have updated our material topics in alignment with new GRI Standards and have mapped our three pillars with new material topics based on our materiality assessment approach. The three pillars still guide our sustainability strategy and commitments. We are planning to conduct a new materiality assessment exercise in 2024 and update our strategy in line with the expectations of our stakeholders.

#### **SOCIAL IMPACT STRATEGY**

Our approach to social impact was formalised with the creation of our social impact policy mapped to the SDGs, and the launch of the DMCC's social impact strategy solidified our commitment. This is represented by the '5th C' under our strategy, 'Care'. Giving back 0.5% of the company's net profit annually towards social impact reinforces our strategic commitment to addressing entrepreneurship, vulnerable communities, and gender equality as a cross-cutting topic.

#### **Entrepreneurship**

DMCC has distinguished itself as an awardwinning free zone and community as the 'Global Free Zone of the Year from the Financial Times fDi magazine for eight years. This acknowledgment stems from our role in advancing the entrepreneurship ecosystem in Dubai. The development of seamless services and education to foster business success is part of whom we are, making entrepreneurship part of our core pillars within our social impact strategy.

#### **Vulnerable Communities**

DMCC promotes and enhances the diamond trade in the UAE and globally because it recognises that vulnerable communities are impacted by the precious metals industry. DMCC is a member of the World Diamond Council through its Dubai Diamond Exchange and Kimberley Process through the Ministry of Economy and acts as a 'connector' to advocate for responsible sourcing. The Kimberly Process exists to reduce the flow of conflict diamonds, includes 85 member countries, industry representatives and NGOs that implement projects to safeguard artisanal miners. We advocate for and protect vulnerable communities through our ability to influence the standard of precious metal trade and operations.

#### **Gender Equality**

Gender equality intersects the entrepreneurship pillar of the social impact strategy. DMCC aims to support female entrepreneurs and partner with organisations focused on female equality and development. In 2021, we signed a pledge with the UAE Gender Balance Council to maintain and promote the increase in women in managerial positions across the UAE.

#### **Our Engagement**

DMCC's stakeholders are diverse and highly regarded, contributing to the value of our services and community. The SDG Steering Committee has identified stakeholders based on how we impact and can potentially impact their financial, social, and environmental operations through engaging with us. We engage directly with all stakeholders, including our materiality assessment process. We revisit the relevance of these stakeholders every two-three years at the time of a materiality review.

# **OUR MATERIALITY APPROACH**

In 2023, DMCC strategically opted to retain the material topics identified during our comprehensive materiality assessment conducted in 2021. This decision, made in consultation with our former auditor and key stakeholders, reflects a deliberate focus on advancing our sustainability initiatives. While it is generally considered best practice to update or reconfirm material topics annually, this year, our primary efforts were dedicated to the development of DMCC's decarbonisation strategy, the accurate calculation of our carbon footprint, and the rigorous preparation for our inaugural quantitative audit. These foundational activities were deemed essential to underpin our long-term sustainability objectives.

Acknowledging the importance of continuously aligning our priorities with evolving stakeholder expectations and global standards, we are committed to undertaking a full materiality assessment exercise next year. This will ensure that our sustainability strategy remains relevant and responsive to the most pressing issues and opportunities.

As this report is based on the assessment conducted previously and is in line with the highest standards of GRI 2021, we would like to highlight and outline below a robust framework that continues to guide our current sustainability efforts. By building on the integrity of this prior assessment, we ensure that our approach remains comprehensive and aligned with our commitment to responsible business practices.

DMCC followed four key steps in order to determine the topics material to our organisation:

#### 1-IDENTIFICATION

DMCC's value chain is multifaceted, with stakeholders engaging across various business activities. The primary activities in the UAE include trade infrastructure (developing ecosystems for the gold, diamond, tea, and coffee industries, alongside emerging sectors and financial services), the free zone (company registration and ecosystem support). and community (property development, management, and engagement). Within each of these areas, DMCC classified stakeholders into tiers 1-3, based on their proximity and potential impact on the organisation.

To ensure a comprehensive and accurate stakeholder list, DMCC conducted interviews with internal directors and managers across all business activities. These interviews provided detailed insights into their operations and informed recommendations for external stakeholder engagement.

As a result, a robust list of over 30 relevant stakeholders and experts was compiled to engage with and gather feedback on DMCC's material topics. The final list underwent a secondary review by DMCC's management team to confirm contact information and stakeholder relevance.

Our Materiality Approach Our Materiality Approach

#### 2-ENGAGEMENT

The Sustainability team conducted indepth discussions with stakeholders, including customers, employees, suppliers, policymakers, industry peers, NGOs, and community organisations, to gain insights into how they perceive DMCC's impact. After reaching out to all relevant external stakeholders for consultations, 30 individuals and organisations participated in 1-2-hour dialogues to assess DMCC's influence and impact.

Given the complexity of DMCC's value chain and business activities, some stakeholders were initially classified under a single business activity but provided feedback across multiple areas due to the broad scope of their operations. Within DMCC's trade infrastructure services, eight stakeholders were engaged across all four verticals. In the community-focused activities, 18 stakeholders were consulted, 13 of whom were residents of Jumeirah Lakes Towers. The free zone activities proved the most intersectional, as many stakeholders operating within trade and community are also licensed member companies. Specifically, for the free zone pillar, we engaged an additional four stakeholders, though many more shared observations on the free zone ecosystem during discussions focused on community and trade.

Prior to consultations, DMCC created educational resources to provide stakeholders with context about the organisation's impact. Each stakeholder was briefed on the intended outcomes of the consultation and informed of updates to the GRI Standards. These resources included a presentation deck outlining what "positive and negative impact" might mean for a stakeholder, the importance of their feedback to DMCC, and open-ended questions designed to guide conversations toward identifying potential issues and areas for improvement. Stakeholders were also encouraged to ask questions for further clarification as needed.

#### **3-ANALYSIS**

The discussions with each stakeholder were transcribed and thoroughly analysed to assess the actual, potential, negative, and positive impacts on the economy, environment, and people. This analysis encompassed all DMCC activities and business relationships mentioned during the meetings. The sustainability team meticulously considered every aspect of DMCC's complex value chain to ensure that stakeholders' feedback was analysed within the context of the organisation's operations.

After classifying all identified impacts, both positive and negative, a cross-reference was conducted against a constructed universe of ESG (Environmental, Social, and Governance) topics sourced from GRI

Standards 2021 and the SASB (Sustainability Accounting Standards Board). This consolidation resulted in a list of relevant material topics for DMCC, aligned with its business activities and stakeholder feedback.

Subsequently, material topics were identified and selected to address each impact highlighted in the analysis. Once the appropriate material topics were confirmed, a prioritisation process was initiated.

#### 4-PRIORITISATION

The sustainability team undertook a prioritisation exercise by scoring each material topic based on stakeholders' feedback. We carefully re-examined all consolidated consultations, taking into account the importance and severity of the impacts identified by stakeholders, which enabled us to internally rank the material topics.

As a result of this exercise, we successfully prioritised the material topics. However, the final decision was made to retain all topics in the report to eliminate any risk of non-compliance with the GRI Universal Standards and to ensure that every impact identified during the stakeholder engagement process is comprehensively addressed.

#### **MATERIAL TOPICS**

A total of 12 material topics were identified, each with a number of underlying subtopics directly aligned with GRI 2021 disclosures. These final topics were selected based on their significance, reflecting the most critical values across all three rankings once averaged through the prioritisation process. DMCC's leadership reviewed each topic to ensure they were fully understood and appropriately addressed. Below is the list of topics identified as material.

- Climate Change and Energy
- Community and Giving
- Customer Satisfaction and Engagement
- **■** Economic Performance
- Ethical Business Conduct
- Governance and Leadership
- Labour Practices
- Occupational Health and Safety
- Supply Chain Sustainability and Responsible Sourcing
- Talent attraction, Development and Retention
- Waste Management
- Water Effluents



# SUSTAINABLE CITY

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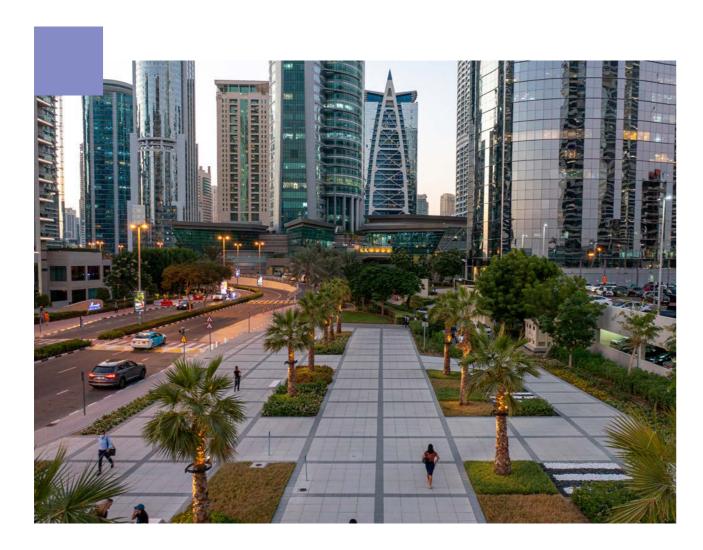
Infrasructure Improvements Infrasructure Improvements

# INFRASTRUCTURE IMPROVEMENTS

At DMCC, we focus on building a strong infrastructure to create a great place for our stakeholders. We are dedicated to providing a safe, healthy, and sustainable environment that meets the needs of our members, residents, and visitors. Our daily operations prioritize safety, health, and sustainability.

Located in the heart of Dubai, our Master Community includes residential, commercial, retail, and leisure areas across three main districts: Jumeirah Lakes Towers (JLT), Uptown Dubai, and the Jewellery and Gemplex.

In this section, we highlight our strategy and ongoing projects that positively impact the lives of our community members and cover key initiatives aligning with UAE and Dubai's sustainability strategies.



#### LANDSCAPE BEAUTIFICATION

DMCC continues to demonstrate its commitment to improving and expanding green spaces within the Jumeirah Lake Towers (JLT). In 2023, we enhanced the landscaping to increase green spaces and create user-friendly public walking areas. These efforts enrich the community environment and give residents and visitors more opportunities to enjoy outdoor activities and connect with nature. By continually investing in green space development, DMCC aims to foster a healthier, more vibrant community for everyone.



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# Football pitch completed in 2022, and is available for community visitors and residents 24 2023 Sustainability Report | Shaping the Future of Trade

#### **ENHANCEMENT OF EXISTING INFRASTRUCTURE**

In our ongoing efforts to improve the infrastructure of the JLT Community, DMCC has recently installed lifts for people of determination. This initiative aims to enhance accessibility and ensure that all members of our community can easily access various facilities. Looking forward, we are exploring the idea of constructing a pedestrian bridge to replace the existing light signal.

This project aims to reduce carbon emissions emitted by vehicles at traffic lights and ensure pedestrians' safety, further contributing to our commitment to creating a safe, accessible, and sustainable community.





#### **SOLAR PANEL CAR PARKING SHADE INSTALLATION**

In partnership with Etihad Esco, we have successfully completed the installation of solar panel car parking shades around the community. This project, which became fully operational by the end of 2023, reflects our commitment to integrating renewable energy solutions within the community. The solar shades are expected to significantly reduce grid energy consumption and reduce DMCC's carbon emissions. This initiative supports our sustainability goals and demonstrates our proactive approach to incorporating sustainable technologies.



# ENERGY, WATER AND WASTE MANAGEMENT

At DMCC, we continue to work on improving our energy, water, and waste management performance by closely monitoring these parameters, improving our performance, and addressing our environmental impact.

Through our facility management provider, Concordia, DMCC manages public spaces around the Jumeirah Lake Towers. The facility management provider collects energy and water readings from Dubai Electricity and Water Authority (DEWA) bills. Waste Management Data are collected from Bee'ah, the only waste management provider in the Master Community.

DMCC assets such as One JLT, Tea and Coffee Center, and the newly completed project Uptown Tower are managed by our facility management supplier, Macro, reporting on energy, water, and waste management data. We have also sourced a lot of data from BeSix the contractor of Uptown Tower.

#### **JUMEIRAH LAKES TOWERS**

At DMCC, we actively address the environmental UAE Net Zero Strategy, we have completed impact of our operations and continuously seek solutions to improve performance and minimise adverse effects.

The Jumeirah Lakes Towers District is a multifunctional hub that includes offices. residential buildings, retail stores, and various services designed to ensure that DMCC fulfills its promise of providing a space where the community can work, live, and thrive.

In 2023, as part of our commitment to the

<sup>1</sup> Emirates Water and Electricity Company, ECWC 2019

We continue to improve our data management via a digital platform by regularly updating and mapping the meters to the tool to ensure the reliability and accuracy of the data. The tool allows us to monitor and track our energy and water consumption across all DMCC assets. It limits human error and highlights unusual spikes, allowing the FM team to rectify the situation.

All energy and water across our operation are sourced from DEWA, and we follow the local standards and Dubai Municipality (DM) guidelines for effluent discharge through the appointed contractor approved by DM.

Starting from this year DMCC will not include the grid emissions factors for DEWA and other elements of its GHG emissions in the report as we did previously. This includes the energy, water and waste performance tables. We have established a new chapter (page 33) that outlines our approach to climate change and detailed overview of our emissions.

the installation of the solar shades project in partnership with Etihad Esco. Additionally, the work on retrofitting the master community clusters is ongoing and will be completed by

Looking ahead, DMCC has ambitious plans for Jumeirah Lakes Towers in 2024. We plan to retrofit four clusters to improve energy efficiency further and retrofit streetlights, including lake lights, with LEDs to reduce

energy consumption. All toilets will be refurbished to include fixtures that minimise energy and water use.

Based on the feedback of our stakeholders, we have looked into our waste management operations and identified a number of gaps,

that we are going to work hard on to improve.

By 2026, we commit to improving the quality of our waste data and opportunities for all our residents and businesses to recycle their waste.



#### **UPTOWN DUBAI DISTRICT**

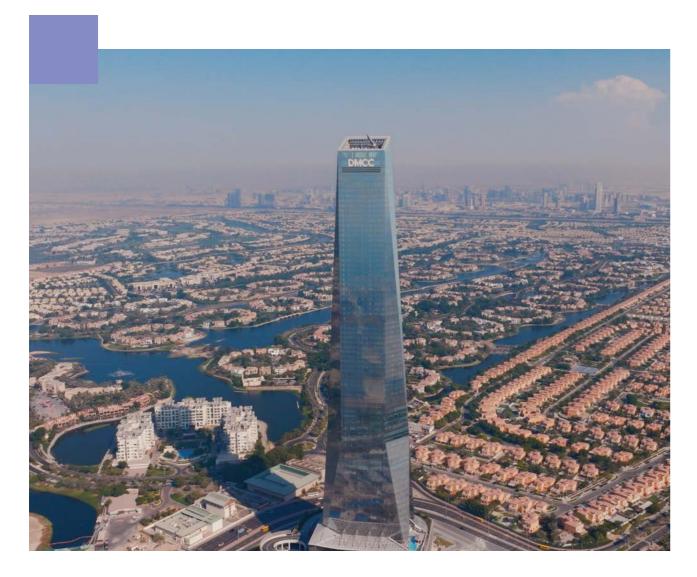
The newly opened Uptown Tower in the Uptown district stands as a testament to DMCC's dedication to innovative and sustainable urban development. This multi-purpose tower incorporates retail stores, hotel residential units, and offices, providing a variety of services to ensure the comfort and convenience of all building users.

<sup>&</sup>lt;sup>2</sup> Starting from 2023, DMCC will not disclose its carbon emissions in the energy/water/waste charts. A detailed overview of DMCC's GHG emissions is available in the

The total reported sewage water effluent by the FM team is 7,329.6 ML. This elevated reading is attributed to a fault in the meter. The FM team has contacted Dubai Municipality for assessment and recor is no option to report the real data.

DMCC has engaged with our waste management service provider, Bee'ah, to obtain a comprehensive waste management report covering all operations managed by Bee'ah. This collaboration aims to prevent double counting of data, ensuring transparency and accuracy in our waste management reporting. As a result, we were able to obtain more accurate values, which are reflected in the 2023 report.

When organic waste does not meet the criteria for composting, it is instead sent to a landfill.
 As per our service provider Bee'ah, when general waste is free of hazardous items such as batteries, it is sent to a Dubai Municipality site for processing, where it is



Designed with highly efficient water and energy fixtures, Uptown Tower is seeking LEED credit under the Core and Shell Assessment, reflecting our commitment to sustainability. In line with our energysaving initiatives, an energy audit was conducted to identify gaps and explore additional opportunities for efficient building management.

As part of our plan to have better visibility over our utility consumption, we have installed smart meters to track and monitor the tower's energy and water consumption, aiming to complete the project by 2024. Additionally,

as part of our water-saving initiative, we are utilising native and desert-adapted plant species within the landscape, which have low irrigation demand.

We have employed a greywater irrigation system to reduce reliance on fresh water. Furthermore, DMCC is committed to improving waste management processes in Uptown Tower by conducting training sessions for tenants to promote a waste segregation scheme to reduce landfill waste and increase recycling. We are looking to run the initiative across DMCC offices in the tower by 2024, reinforcing our dedication to sustainable practices across our operations.

#### **Uptown Tower - Construction**

Energy, Water, and Waste Performance					
Indicator 2021 2022 2023					
Renewable Fuel Sources - Solar Power (GJ)	727'	2,199.93	2,073.77		
Non-renewable Fuel Sources (GJ) Diesel Consumption (liters) Electricity from the Primary Grid <sup>8</sup>	572,524 (1,539 tCO <sub>2</sub> ) 8,583 (1,015 tCO <sub>2</sub> )	530,900 (1,427 tCO <sub>2</sub> ) 8,058 (896 tCO <sub>2</sub> )	337,752 3,300.6		
Water Consumption (MI) <sup>9</sup> Recycled Wastewater	63.9 (333 tCO <sub>2</sub> )	69.6 (363 tCO <sub>2</sub> )	51.46 73.60		
General Waste Recycled Landfill	6341.43 7,430.46	17,955.30 1,782.1	12,622 1,990		

\*All figures refer to Scope 2 except for the uptown diesel consumption, which refer to Scope 1. The approach used for calculating all the CO2 emissions throughout the report is based on operational control.

#### **Uptown Tower - Operations**

#### **Energy, Water, and Waste Performance**

Indicator	2023
Non-renewable Fuel Sources (GJ)	
Diesel Consumption (Liters)	4
Electricity from the Primary Grid <sup>10</sup>	28,580.55
Water Consumption (MI) <sup>11</sup>	38.6
General Waste Recycled Waste To Energy Landfill	<b>50.91</b> 18.72 189.57 <sup>12</sup> 50.91

#### Uptown Plaza - Construction

Energy, Water, and Waste Pe	rformance
Indicator	2023
Non-renewable Fuel Sources (GJ)  Diesel Consumption (Liters)  Electricity from the Primary Grid <sup>13</sup>	49,259 425.84
Water Consumption (MI) <sup>14</sup> Recycled Wastewater <sup>15</sup>	2.38 0.153 <sup>16</sup>
General Waste Recycled Landfill Construction Waste Recycled Landfill	95" 95 0 210 0 210 <sup>18</sup>

 $<sup>^{7}</sup>$  Additional 375.5 GJ was generated by solar panels; however, the excess was given back to the DEWA grid.

<sup>&</sup>lt;sup>8</sup> Calculation methodology is based on US Environmental Protection Agency formula of 10,180grams of CO2/gallon of diesel

<sup>9</sup> Sweet water - 58ML salt water 9.7ML

Ocalculation methodology is based on US Environmental Protection Agency formula of 10,180grams of CO2/gallon of diesel

<sup>&</sup>lt;sup>11</sup> Sweet water - 58MI, salt water 9.7MI

<sup>12</sup> If the general waste collected doesn't contain hazardous material it is sent to Dubai Municipality sites to be incinerated to generate energy from waste

<sup>&</sup>lt;sup>13</sup> Calculation methodology is based on US Environmental Protection Agency formula of 10,180grams of CO2/gallon of diesel

<sup>&</sup>lt;sup>14</sup> Sweet water - 58Ml, salt water 9.7Ml

<sup>16</sup> To convert cubic meters (CBM) to megalitres (ML), we used the following factor: 1 megalitre is equal to 1,000 cubic meters

<sup>&</sup>lt;sup>17</sup> For general waste, the density can vary, but it is often estimated at around 0.3 to 0.6 tonnes per cubic meter, depending on the type of waste (e.g., household, commercial). Using an average density of 0.5 tonnes per cubic meter for general waste: Collected waste CBM x0.5 tonnes/CBM=Total waste intonnes

<sup>18</sup> For construction waste, the density can vary depending on the materials involved (e.g., concrete, wood, metal, etc.), but a general estimate for mixed construction waste is about 1.2 to 1.8 tonnes per cubic meter.

Using an average density of 1.5 tonnes per cubic meter as a general estimate:

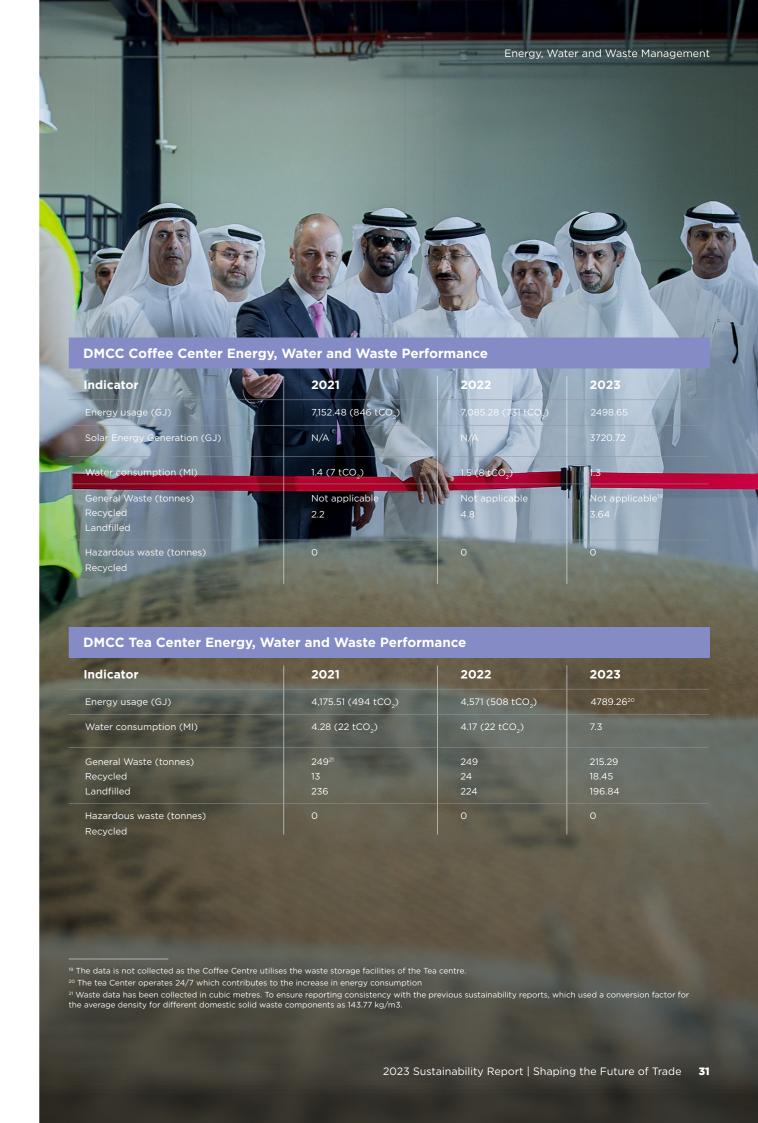
#### **DMCC COFFEE AND TEA CENTRES**

The DMCC Tea and Coffee Centre, located in the Jebel Ali Free Zone, is a flagship initiative that significantly facilitates the rapid growth of coffee and tea trading. In 2023, DMCC contracted a consultant to conduct an energy audit at its centers to identify further opportunities for energy savings.

Through our partnership with Etihad Esco, we have completed the installation of solar panel shades in the Coffee Center. Notably, the incorporation of renewable energy has contributed to substantial energy savings.

Additionally, DMCC has taken major steps to improve the waste management process at the centres. The Tea and Coffee Centre collects all recyclable materials from offices, plant rooms, and common areas, segregates them, and then hands them to Imdaad, the waste management provider.

Upon collection, the waste is weighed, ensuring meticulous waste management. Furthermore, all compact fluorescent lights (CFL) in the Tea Center are replaced with energy-efficient LED lights in offices, common areas, and washrooms, and external lights have been replaced with LED focus lights. These initiatives underscore DMCC's commitment to sustainability and energy efficiency within its operations.



#### **ONE JLT**

In 2023, DMCC's "One JLT initiative" continued to demonstrate our unwavering commitment to sustainability by installing highly efficient fixtures designed to save energy and water. By incorporating renewable energy sources within the building, we reduced our energy consumption, achieving a notable 28% decrease.

Additionally, the implementation of an advanced waste management scheme has significantly enhanced our waste management performance. This scheme emphasises segregation at the source, ensuring that waste is efficiently sorted and recycled. These efforts reflect our dedication to creating a more sustainable and environmentally friendly community at One JLT.



One JLT Energy, Water and Waste Performance				
Indicator	2021	2022	2023	
Energy usage (GJ)	7,599.03 (899 tCO <sub>2</sub> )	7,350.95 (816.78 tCO <sub>2</sub> )	5,307.79	
Solar Energy Generation (GJ)	N/A	N/A	1683.05	
Water consumption (MI)	12.02 (63 tCO <sub>2</sub> )	12.79 (67 tCO <sub>2</sub> )	13.85	
General Waste (tonnes)	505 11.62	790 20.37	1223.5 <sup>22</sup>	
Recycled Landfilled	493.4	769.42	19.10 758.187	
Hazardous Waste (tonnes) Recycled	0.507 0.507	0.31 0.31	0.034 0.034	

<sup>&</sup>lt;sup>22</sup> DMCC has collaborated with our waste management service provider, Bee'ah, to obtain a comprehensive waste management report covering all operations managed by Bee'ah. This collaboration aims to prevent double counting of data, ensuring transparency and accuracy in our waste management reporting. As a result, we were able to obtain more accurate values, which are reflected in the 2023 report.

# DMCC'S CLIMATE ACTION AND **DECARBONISATION STRATEGY**

#### **COMMITMENT TO CLIMATE ACTION**

At DMCC, we recognise that climate change is a pressing global challenge that requires immediate and sustained action. As a leading free zone and global trading hub, we are committed to mitigating our environmental impact and promoting sustainability within our operations and

across our value chain. Our Board of Directors has set an ambitious goal for DMCC to achieve Net Zero emissions by 2050, reflecting our dedication to environmental stewardship and alignment with both local and global climate initiatives, including the UAE's Net Zero by 2050 Strategy.

#### **COMPREHENSIVE DATA DISCLOSURE FOR DMCC'S GREENHOUSE GAS EMISSIONS (GHG)**

Last year, we made two key commitments: to establish our GHG emissions baseline and to disclose audited data on our emissions. We invested a significant amount of effort this year and used company-wide resources to capture as much information as possible against all our operations.

As a result, we successfully completed a comprehensive assessment of GHG emissions, covering all Scope 1, 2, and 3 emissions in alignment with the GHG Protocol Corporate Accounting and Reporting Standard. This assessment provided a holistic view of our direct and indirect emissions, enabling us to identify opportunities for reduction.

The total GHG emissions for DMCC in 2023 were calculated as 48,187.70 tCO2<sub>3</sub>e.

#### The breakdown of emissions is as follows:

- Scope 1 Emissions: 661.91 tCO<sub>2</sub>e (1% of total emissions)
- Scope 2 Emissions: 10,585.23 tCO<sub>2</sub>e (22% of total emissions)
- Scope 3 Emissions: 36,940.56 tCO<sub>2</sub>e (77% of total emissions)

#### **SCOPE 1 EMISSIONS: DIRECT EMISSIONS FROM OPERATIONS**

Scope 1 emissions include all direct emissions from sources owned or controlled by DMCC, such as stationary combustion, mobile combustion, and fugitive emissions from refrigerants and fire suppression systems.

- Stationary Combustion: The use of diesel generators across various DMCC assets, including Uptown Tower and the Master Community, resulted in 210.76 tCO<sub>2</sub>e of emissions. This was calculated using the Consumption-Based Method, which relies on actual fuel consumption data.
- Mobile Combustion: Emissions from DMCC-owned vehicles, including leased-buses and company service vehicles, totalled 100.51 tCO<sub>2</sub>e. These emissions were calculated using the Fuel-Based Method based on precise fuel consumption records.
- Fugitive Emissions: Emissions from refrigerant leaks and fire suppression systems were estimated at 214.06 tCO<sub>2</sub>e. Given incomplete data for certain assets, these emissions were calculated using the Screening Method, which is based on average leakage rates and equipment capacity.

#### **SCOPE 2 EMISSIONS: INDIRECT EMISSIONS FROM PURCHASED ENERGY**

Scope 2 emissions represent indirect GHG emissions resulting from the consumption of purchased electricity and cooling.

- Purchased Electricity: The consumption of electricity across DMCC's properties, including OneJLT, Uptown Tower, and the Tea & Coffee Centres, generated 8,524.51 tCO<sub>2</sub>e. These emissions were calculated using the Consumption-Based Method, with several assumptions made against the total area ratio for the assets that we coulnd't locate the data for. These methods incorporated utility-specific emissions factors provided by DEWA (Dubai Electricity and Water Authority).
- Purchased Cooling: The use of district cooling systems, particularly in facilities such as Uptown Tower, contributed an additional 2,060.72 tCO<sub>2</sub>e to Scope 2 emissions.

#### **SCOPE 3 EMISSIONS: OTHER INDIRECT EMISSIONS FROM VALUE CHAIN ACTIVITIES**

Scope 3 emissions, which constitute the majority of DMCC's total emissions, include all other indirect emissions that occur in our value chain, both upstream and downstream. The total Scope 3 emissions for 2023 were 36,940.56 tCO<sub>2</sub>e. Key categories contributing to these emissions include:

- Category 1: Purchased Goods and Services (1,603.31 tCO<sub>2</sub>e): Reflecting emissions from the procurement of goods and services required for our operations. The emissions were assessed using a spend-based method that estimates emissions based on financial expenditures.
- Category 2: Capital Goods (28,812.68 tCO<sub>2</sub>e): This was the largest contributor to Scope 3 emissions, driven by ongoing construction, infrastructure development and fit-out projects, including Uptown Dubai District, Emissions were calculated using a spend-based method.
- Category 3: Fuel and Energy Activities (46.43 tCO<sub>2</sub>e): Emissions were calculated based on the low-accuracy method.
- Category 5: Waste Generated in Operations (741.07 tCO<sub>2</sub>e): Emissions from waste management activities, including recycling and landfill waste, were calculated based on volumes of waste generated and types of waste treatment.

- Category 6: Business Travel (699.29) tCO<sub>2</sub>e): Emissions were calculated based on the actual travel data of all employees.
- Category 7: Employee Commuting (1,684.22 tCO<sub>2</sub>e): Calculated using data from employee surveys on commuting modes and distances.
- Category 13: Downstream Leased Assets (1,838.41 tCO<sub>2</sub>e): Emissions from leased out assets managed by third parties, particularly in newly completed facilities like Uptown Tower.
- Category 15: Investments (6.42 tCO₂e): Minimal emissions associated with DMCC's financial investments, reflecting a lowcarbon impact from the entities in which DMCC holds stakes.

#### **DECARBONISATION ROADMAP AND** STRATEGIC TARGETS

In alignment with our target of achieving Net Zero by 2050, DMCC has developed a comprehensive Decarbonisation Roadmap. This roadmap, grounded in the outcomes of our GHG emissions assessment, outlines a phased approach with specific interim targets to ensure ongoing progress towards our environmental goals. Key elements of our Roadmap and its foundation include:

- 1. Boundary Setting and Data Collection: DMCC adopted the 'Operational Control Approach' to establish the organisational and operational boundaries for emissions reporting. This approach allowed us to differentiate between our direct and indirect emissions across all operational activities. A comprehensive data collection effort was undertaken in collaboration with all relevant stakeholders to establish a 2023 baseline GHG footprint. The GHG emissions were then calculated using the DMCC GHG Calculator, followed by a detailed analysis of the results.
- 2. GHG Calculation Methodology: Our methodology included the development of 'GHG Emission Cards' that detailed the formulas, assumptions and exclusions, and approach used to calculate emissions across all scopes (Scope 1, 2, and 3).

- **3.** Emission Forecast and Target Setting: DMCC's Decarbonisation Roadmap provides a forecast of emissions under a Business-As-Usual (BAU) scenario and outlines pathways for reducing these emissions. We have set near-term, mid-term, and long-term targets, each supported by tangible actions and KPIs to monitor progress:
- Near-Term Actions (2023-2030): Immediate actions focus on enhancing energy efficiency, increasing on-site renewable energy use, reducing waste to landfill, and implementing sustainable procurement policies. Our target is to reduce Scope 1 and 2 emissions by 56% by 2030 through these initiatives.
- Mid-Term Actions (2030-2040): The focus will shift to expanding successful initiatives, deploying advanced technologies for further emissions reductions, and fostering greater engagement with suppliers to enhance sustainability across our value chain.
- Long-Term Actions (2040-2050): The final phase will neutralise any remaining GHG emissions through nature-based solutions, carbon capture technologies, and other innovative offset mechanisms. This approach aims to bring DMCC's total net emissions to zero by 2050 in line with the UAE Net Zero Strategy.

#### IMPLEMENTATION, **MONITORING, AND CONTINUOUS IMPROVEMENT**

DMCC has established a cross-functional sustainability team to oversee the implementation of the decarbonisation roadmap. This team is responsible for strategic planning, stakeholder engagement, pilot projects, and performance monitoring. Regular audits and reviews will ensure the effectiveness of our actions and drive continuous improvement.

To improve data accuracy, DMCC plans to implement a Greenhouse Gas (GHG) Management System by the end 2024. This system will enhance data collection processes, facilitate regular audits, and refine our methodologies, ensuring that our sustainability reporting meets international standards.

# DMCC'S SMART AND SUSTAINABLE DISTRICT

In 2023, DMCC continued its commitment to creating a smart, sustainable district by investing in advanced technologies to monitor our clusters effectively. Our smart system solutions continue providing realtime monitoring of various environmental and operational parameters across the district. This initiative allows us to track energy consumption, water usage, waste management, and other key sustainability metrics.

Additionally, DMCC is continuously exploring innovative technologies to ensure the accuracy and reliability of the data we collect. By integrating intelligent solutions, we aim to enhance our sustainability performance and make data-driven decisions that support our long-term environmental goals.

We are in the process of developing a new community portal called "Mygate," aimed at providing access to various services, facilitating communication of updates, and enhancing business-to-business (B-to-B) interaction and service exchange within our community. This innovative platform is designed to streamline access to essential services and information, making it easier for community members to stay informed and connected. The Mygate portal is scheduled for launch by the end of 2024 or early 2025, marking a significant step forward in our commitment to improving the overall experience for our stakeholders.

# **OCCUPATIONAL** HEALTH **AND SAFETY**

At DMCC, the health and safety of our stakeholders are our top priority. We are committed to implementing comprehensive HSE policies and procedures to protect the well-being of our owners, residents, and visitors. Across a Master Community and DMCC assets, we continually strive to excel in meeting our health and safety commitments.

We have identified significant actual and potential positive impacts through our stakeholder engagement efforts. As the guardians of HSE regulations within our community, we actively monitor and improve existing infrastructure to mitigate potential challenges related to new plot developments and ongoing business activities. This proactive approach ensures that the well-being of our community remains at the highest standard.

Our Occupational Health and Safety Management System is developed and implemented in accordance with the HSEQ plan carried out by the facility management service provider for the Master Community. This system adheres to internationally and locally recognized standards. International standards include ISO 45001 for occupational health and safety management, ISO 14001 for environmental management, and ISO 9001 for quality management. Locally, HSEQ plans adhere to Dubai Municipality and Dubai Civil defence codes incorporated in DMCC guidelines. All work activities within the Master Community are thoroughly covered and monitored under the supervision of DMCC under permits issued by the facility management provider.

All activities within the Master Community are regulated and monitored through permits issued by the facility management service provider under DMCC's oversight. We ensure that all work activities, including non-routine tasks, are carefully controlled and managed through comprehensive risk assessments. To identify Hazards and assess risk, we have implemented the following procedures: C-PRC-IMS-010: Incident Reporting, Investigation, and Analysis, C-PRC-IMS-HSE-004: Risk Impact Assessment, and C-PRC-IMS-022: Enterprise Risk Management. We have also implemented the following hierarchy of control to eliminate Hazards and minimize risk: ERICPD (Eliminate, Reduce, Isolate, Control, Personal Protective Equipment (PPEs), and Discipline). Regular inspections, tours, and audits are conducted to ensure these processes are effectively implemented. The DMCC senior HSE manager oversees all processes to ensure the implemented procedures' quality. International standards and legal requirements are also considered when preparing the risk assessment of all activities. The competency of the engaged staff is achieved through mandatory external training and a thorough review of the key staff profile of the service providers as per contract requirements. The findings from these audits contribute to our continuous improvement efforts, as feedback, learnings, and incident investigations are thoroughly reviewed and integrated into risk assessments and other processes.



Occupational Health and Safety Occupational Health and Safety

We have introduced a risk identification and reporting system utilizing the Eco-Online and CAFM platforms to improve the management of work-related hazards and risks. This system enables reporting through dedicated call centres, providing an accessible channel for hazard identification. Our Health, Safety, and Environment (HSE) team, in collaboration with the Human Resources (HR) department, manages professionals responsible for ensuring the health and safety of our organization, while maintaining confidentiality. Facility management service providers report hazards through the CAFM system via the call centre, and their respective companies implement internal measures to protect employees from any potential retaliation.

We introduced an employee empowerment policy that enables workers to stop or refuse any unsafe work and report concerns to management. Additionally, we have an Incident and Investigation Procedure in place to evaluate and assess incidents-related risks and determine appropriate corrective actions. Our department supervisors receive comprehensive accident investigation and reporting training from a third-party expert.

A documented procedure supports worker participation and consultation in developing, implementing, and evaluating the HSE management system. This includes monthly HSEQ meetings, Toolbox Talks, and classroom HSE awareness sessions. An HSEQ committee, comprising the heads of all departments of building management and DMCC, meets on a regular basis. The committee has the decision-making authority within its scope of responsibilities, including the approval of operational health and safety policies, procedures, and initiatives. In addition, it manages the process of collecting feedback from team members, including contractor workers, and incorporates it into the monthly HSEQ forum. The committee will include a representative from workers by Q4 2024 to ensure equal representation of all stakeholders.

Our occupational health and safety management system, which has been audited and certified by an external party covers all employees and workers<sup>23</sup> under the control of DMCC.

#### **Internal Training Programmes**

- 37 Toolbox Talks Safety Awareness programs delivered to all staff
- TBTs of Safety Awareness Programs attended by 7,687 Master Community FM Staff, including security & service providers

#### **Internal Safety Awareness Session**

Attended by 2341 employees, including regular service providers

#### **External Training Programmes:**

- Defensive driving training
- HSEQ employees attended NEBOSH Fire Safety Certificate Training
- HSEQ employees attended NEBOSH Environmental Training
- Basic Fire Warden Training
- Basic First Aid Training
- IOSH Managing Safely for Supervisors
- Accident Investigation Training for Supervisors

#### 2023 key highlights and achievements:

- Uptown Tower has achieved ZERO LTI's from construction to completion of the project
- Nominated for the Construction Weekly Health & Safety Initiative of the Year Award Uptown.
- Successful mobilisation of HSE procedures during the transition from construction to occupation in Uptown Tower

<sup>&</sup>lt;sup>24</sup> The manpower, including contractors is -180 in Uptown Tower. 2,184 manpower including permit to work contractors, 604 manpower in the MC including FM contractor (Concordia DMCC & Its appointed Service Providers) covered by occupational health and safety management system and has been internally audited;



HSE Indicator	Master Community	Uptown District	DMCC Coffee and Tea Centres
Total Hours Worked Employees Non-employees <sup>25</sup>	1,904,701 (FM Contractor) 2,9939,988 (Service Providers controlled under Permit to Work)	14,155.24 5,112,563	20,608.24 271,810
Total Number of Lost Day Rate	0	0	0
Total Number of Lost Time Injuries	0	0	0
Total Number of Occupational Illnesses/Diseases	1 Heat stress related cases due to ambient temperature	0	0
Total Number of Fatalities (Recordable/Work-related)	0	0	0
Non-compliance with Environmental Laws and Regulations	0	0	0

Issues flagged for rectification are then delegated to DMCC and Concordia. Any issues which arise from external stakeholders within the community are dealt with by the HSE department, and DMCC issues warnings and violations as required, which could include fines. It is then the stakeholders' responsibility to close out the issues detected, which is overseen by DMCC.

During our induction program, we make sure all new employees are informed about the procedures for reporting risk-related hazards and dangerous situations. Fostering a culture of proactive reporting is essential to us, and as part of our initiatives, Uptown Dubai offers monthly incentives to employees who report hazardous or risk-related work conditions.

We remain dedicated to maintaining international safety standards. We adhere to guidelines established by organizations like the British Safety Council and prioritize Nebosh training programs to mitigate risks and prevent critical hazards. These initiatives ensure that our operations align with industry best practices and prioritize the safety and well-being of our stakeholders. While DMCC is evaluating the implementation of ISO 9001, ISO 14001, and ISO 45001 across its assets, we have temporarily put this process on hold due to the upcoming changes to the

Coffee Centre's infrastructure. However, we remain committed to upholding international standards for safety. We prescribe to standards set by organizations such as the British Safety Council, and we emphasize the implementation of Nebosh training programs to mitigate risks and prevent critical hazards. These measures ensure that our operations align with industry best practices and prioritise the safety and well-being of our stakeholders.

# COMMUNITY **ENGAGEMENT**

As the Master Developer of the Jumeirah Lakes Towers district and a government entity in Dubai, we are deeply committed to fostering the wellbeing and sustainable lifestyle of our residents. Our continuous efforts to enhance the existing infrastructure underscore our dedication to creating a vibrant community while prioritising environmental stewardship.

To further support the growth and development of our members and the wider community, we have implemented various programmes focused on business education. One of the most impactful of these is the DMCC Impact Scale-Up Platform, launched to empower entrepreneurs who are aligned with the United Nations

Sustainable Development Goals. In 2023, in collaboration with Companies Creating Change (C3), we delivered an intensive six-month programme aimed at equipping impact-driven startups with the skills, knowledge, and insights needed to address global challenges effectively.

The programme culminated in a pitch day, where 15 SMEs tackling some of the world's most pressing sustainability issues presented their businesses to a panel of experts from PwC, Global Ventures, Astrolabs, and Brunswick. The event, held at the Almas Towers Conference Center, featured an audience of experts. entrepreneurs, and investors from the UAE's impact and entrepreneurship ecosystem.

<sup>&</sup>lt;sup>24</sup> Calculation methodology; the numbers are maintained through individual reports sent to DMCC Property Department control which then enable the monthly dashboards. Master Community incidents are logged by Concordia, Jumeirah Lakes Towers facility management provider. Depending on the severity of the cases, they are escalated to DMCC Asset Management and HSE team. In addition, security reports of any incidents are circulated to key personnel, and a documented report follows, which is sent to the relevant internal stakeholders.

All rates have been calculated based on the 1,000,000 hours approach. For 2022 and earlier data, please refer to Sustainability Reports at www.dmcc.ae/sustainability. 25 DMCC is unable to provide the data on the specific number of workers who are not employees, as it doesn't have a system and methodology to calculate it. All workers who are not employees, whether they are providing a service in line with a direct agreement with DMCC, through sub-contractors, or through agreements between parties located within the Master Community, are subject to DMCC's occupational health and safety management system. dashboards. Master Community incidents are logged

Three exceptional startups were awarded a total of AED 180,000 in cash prizes:

- **Grocedy** A Nigerian FoodTech platform that aggregates micropayments from low and middle-income earners towards a monthly food subscription and other micro financial services.
- **EatCloud** A Colombian start-up that uses Al and blockchain technology to redistribute surplus food worldwide, reducing waste and supporting food banks globally.
- Chefaa An Egyptian GPS-enabled pharmacy benefits platform that allows patients to order, schedule, and refill recurring prescriptions, along with all their pharmacy needs.

At DMCC, we remain deeply committed to fostering the growth of small and medium-sized enterprises (SMEs) that make a positive social and environmental impact. The DMCC Impact Scale-Up Programme exemplifies our dedication to supporting these businesses, enabling them to thrive within our community and contribute to the global sustainability agenda.

In addition to engaging with our business community, DMCC also actively involved the residents of Jumeirah Lakes Towers during the materiality assessment process. This engagement was essential to gather valuable feedback and integrate it into our overall analysis. As part of our commitment to transparency and accountability, we have established a formal grievance process that allows residents to report their feedback or concerns directly to DMCC Community Management or escalate them to Dubai Municipality if necessary.

We conducted a comprehensive assessment of our community operations to identify any actual or potential negative impacts. We are pleased to report that our findings indicate minimal to non-existent negative impacts within our operations. As the governing authority of JLT, we take seriously our responsibility to ensure that all stakeholders comply with the laws and regulations governing the community.

One potential area of negative impact is associated with our role in granting business licenses to various entities. While this empowerment drives economic growth, there remains a risk that some entities may not fully comply with relevant laws or procedures, potentially leading to adverse outcomes. To mitigate this risk, DMCC has established robust rules and regulations that align with international best practices. We are committed to ensuring strict adherence to these regulations, acting in the best interests of our community by proactively addressing any negative impacts that may arise from the actions of our license holders.

It's important to acknowledge that many of these risks are beyond DMCC's direct control, as various industries are regulated by different Ministries or governmental bodies within the UAE. Nonetheless, DMCC works closely with all relevant stakeholders to ensure that immediate action is taken as soon as any risks are identified, thereby safeguarding the well-being of our community.



# OPERATIONAL EXCELLENCE

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Governanance and Leadership Governanance and Leadership

# **GOVERNANCE AND LEADERSHIP**

Our operations and sustainability objectives are guided by several esteemed governing bodies that by His Highness Sheikh Mohammed bin Rashid play a vital role in overseeing our progress and ensuring adherence to protocols and standards. These organizations are instrumental in shaping business operations and promoting best practices within our industry. At DMCC, we actively participate in these bodies to stay informed about the latest developments, share insights, and provide exceptional services to our stakeholders.

Some of the key governing bodies we engage with include the Dubai Free Zone Council, World Diamond Council, Kimberley Process, UAE Gender Balance Council, OECD MultiStakeholder Group, and the World Federation of Diamond Bourses. Through our involvement, we stay up to date with industry best practices and collaborate with fellow interests of our stakeholders and the broader industry leaders to continuously enhance our operations.

In alignment with the new law issued in 2020 Al Maktoum, Ruler of Dubai, Vice President, and Prime Minister of the UAE, we established a Board of Directors in 2021. The Board serves as the highest governing body responsible for supervising DMCC's activities. This law sets forth a comprehensive framework and procedures that promote strong governance within DMCC and facilitate ease of trade in the UAE.

We value the guidance and oversight provided by the governing bodies, and their collective efforts contribute to the overall success and sustainability of DMCC. By working closely with them, we ensure that our operations align with the highest standards and best serve the community.

#### **DMCC BOARD OF DIRECTORS**

Name	Board Members' Commitments
Hamad Mubarak Buamim	Chairman of DMCC's Board of Directors, Chairman of World Chambers Foundation, Board member of Dubai World and Dubai Islamic Bank PJSC, Chairman of National General Insurance PJSC, and advisory roles in other large corporations.
Abdul Wahed Abdul Rahim Al Olama	Vice Chair of DMCC's Board, non-executive member of the Board of Directors of Dubai Financial Services Authority, and independent member of the Board of Directors of Commercial Bank of Dubai PJSC.
Ahmed Bin Sulayem	None
Abdullah Saif Al Shamsi	Principal of Investment Infrastructure in Investment Corporation of Dubai.
Charles George Webb	Leads two consulting businesses, providing research and strategic advice to global clients.
Roger Alfred Bernstein	Florida Board Certified immigration attorney, principal and managing member of EB-5 for Florida, LLC, with substantial experience in EB-5 Investor-related issues.
Thierry Jean Louis Gimonnet	Finance Director of Investment Corporation of Dubai.

The appointment of board members, including the Chairman, is carried out by the Ruler in accordance with the provisions outlined in Decree No. 28 of 2015 Concerning the Governance of the Boards and Committees Affiliated to the Government of Dubai and the DMCC Law. These appointments ensure that the board members fulfil their roles and duties in alignment with the applicable regulations. The Decree does not specify the tenure of the members, as the appointment letters and the DMCC resolution appointing the directors do not specify the length of tenure of the Board Members. Technically, this does not mean that the tenure is open-ended since a royal decree can terminate or renew the appointments at any time at the Ruler's discretion.

The Board of Directors comprises members within the age range of 30-50, accounting for 57% of the board composition, while those above 50 represent 43% of the board. As of now, there is no female representation on the board. All members of the Board are non-executive, except for Ahmed Bin Sulayem, the CEO and Chairman of DMCC

The DMCC Board of Directors holds the authority to approve all policies and procedures across DMCC. It conducts annual reviews to assess the performance of DMCC, and appropriate actions are taken based on the evaluation outcomes. Additionally, the board plays a role in reviewing the DMCC sustainability report post-publication. Although the level of involvement may change in the future, depending on the board's decision to engage more extensively with the sustainability team and the SDG Steering Committee.

To maintain impartiality, board members are required to sign a conflict-of-interest declaration during their onboarding process. This ensures that they abstain from voting on decisions in which conflicts of interest may arise. Instances involving conflicts of interest are documented internally for transparency and accountability, but they are not publicly disclosed due to confidentiality constraints.

The Board of Directors contributes diverse skill sets and expertise to DMCC, spanning areas such as property, finance, free zone, and commodities. They play a crucial role in developing, approving, and supporting DMCC's value proposition, strategy, and policies related to sustainability. While measures to advance the board's collective knowledge, skills, and experience in sustainable development have not been taken to date, they are planned for the future.

The Board of Directors has established two subcommittees: the Audit Sub-Committee and the Remuneration Sub-Committee. The Chairman of the Board of Directors selects the members of these subcommittees in accordance with the Board of Directors Charter. The tenure of the subcommittee members is undefined and subject to the decision of the Chairman.

The Audit Sub-Committee oversees the integrity of financial statements, reviews internal financial and operational controls, monitors and evaluates the effectiveness of the internal audit function, recommends the appointment of external auditors, and reviews the independence, objectivity, and effectiveness of the audit process. The members of the Audit Sub-Committee include Thierry Gimonnet (Chairman), Abdulwahid Al Ulama, Abdulla Al Shamsi, and Justin Manala, DMCC Director of Internal Audit & Risk Management, who serves as the Subcommittee Secretary. Any violations, misconduct, and issues are reported to the Committee in accordance with the Corporate Whistleblowing Policy. Critial issues raised through grievance mechanisms and identified by the Internal Audit team are shared with the Committee for review and actions.

The Remuneration Sub-Committee is primarily responsible for establishing the framework or broad policy for the remuneration of the Executive Committee and the Executive Chairman and CEO. This includes determining annual performance measures for management and reviewing proposals for long-term incentive plans, where appropriate. The members of the Remuneration Sub-Committee include Abdulwahid Al Ulama

**Economic Performance** Governanance and Leadership

(Chairman), Abdulla Al Shamsi, Thierry Gimonnet, and Ahmad Al Shareef, DMCC Director of Human Resources, who serves as the Subcommittee Secretary. The HR department collaborates with an independent third-party remuneration consultant to propose changes and ensure the effectiveness of the organisation's structure. Violations, misconduct, and issues are reported to the respective Audit

Committee and Board in accordance with the Corporate Whistleblowing Policy.

The Internal Audit Committee at DMCC operates independently. Its role is to uphold ethical standards of social and environmental issues while enhancing policies and procedures through risk-based objectives.

#### **EXECUTIVE COMMITTEE**

The Executive Committee plays a crucial role in ensuring the organisation's strategic objectives are effectively managed. Comprising directors of DMCC's business units, the committee serves as the primary decision-making body and oversees the implementation of our sustainability strategy in collaboration with the SDG Steering Committee.

#### **SDG STEERING COMMITTEE**

Led by the Chief Operating Officer, the SDG Steering Committee consists of six members from the Executive Management representing core services of DMCC's operations. This committee is responsible for managing the implementation of the sustainability strategy and fostering collaboration across the organisation to meet our commitments to the UN Global Compact, Women's Empowerment Principles, and Sustainable Development Goals (SDGs). The sustainability team reviews and analyses sustainable impact initiatives, while key departments ensure the implementation of best practices and the increase of positive impacts. The SDG Steering Committee reports annually to the Executive Committee on the organisation's impacts on the economy, environment, and people.

#### **POLICY COMMITMENTS**

DMCC upholds responsible business conduct and respect for human rights through various policy commitments, including the Code of Conduct, Fraud Control Policy, and Sustainability Policy. The Fraud Control Policy guides thorough due diligence and precautionary actions in all business operations. The policy commitments are integrated into Our policies align with our commitment and membership in the UN Global Compact, specifically Principles 8 and 9 on environmental stewardship. We demonstrate our commitment through partnerships, adoption of new technologies, and projects highlighted in the Sustainable City section of this report.

These policy commitments are accessible to DMCC employees through the Employee Portal and are communicated to new employees

during the induction process. External stakeholders can access publicly available policies on the DMCC website, and specific case-specific policies are shared with external stakeholders as needed.

existing and future operations through the annual review of departmental strategies, objectives, key performance indicators (KPIs), and results. Through the annual performance review process for each employee and department, compliance with these commitments is monitored. Training on the DMCC Code of Conduct, other policies, and sustainability is provided to employees to ensure their understanding and adherence.

# **ECONOMIC** PERFORMANCE

DMCC's impact on Dubai's economy is significant, both directly and indirectly. Our free zone plays a crucial role in driving employment, accounting for over 2% of total employment in Dubai. Additionally, the residents of the Jumeirah Lakes Towers district represent approximately 3% of Dubai's population. This demonstrates the scale of our influence on the local workforce and community.

As a facilitator for company setups, DMCC contributes to the GDP through the generation of additional profits, wages, and rents. Our role in attracting foreign direct investment (FDI) fosters a high concentration of economic activity within our free zone. DMCC now accounts for 15% of all FDI and 7% of the emirate's GDP. This concentration promotes the exchange of technologies, innovations, and ideas, ultimately raising the productivity levels of Dubai and the UAE as a whole.

To measure our direct economic contribution to Dubai's GDP, we conducted a comprehensive quantitative assessment. This assessment involved calculating the direct economic impact based on sectorspecific employee data from businesses within the DMCC free zone, as well as utilizing national accounts data from the Dubai Statistics Centre. By analysing these factors, we obtained a clear understanding of our economic significance and the value we bring to Dubai's economy.

DMCC's presence in Dubai and the UAE contributes to increased productivity through various mechanisms, including

economic density spill-over benefits, FDI spill-over benefits, and indirect supply chain benefits.

Economic density spill-over benefits refer to the positive impacts generated by the concentration of economic activity within the DMCC free zone. By fostering a vibrant business ecosystem and attracting a diverse range of companies, DMCC creates opportunities for collaboration, knowledge sharing, and innovation. This concentration of economic activity leads to enhanced productivity as businesses benefit from proximity to other industry players, suppliers, and service providers. The exchange of ideas, expertise, and resources within this ecosystem drives productivity gains and promotes economic growth.

FDI spill-over benefits result from DMCC's role in attracting foreign direct investment. As a renowned free zone with a favorable business environment, DMCC acts as a magnet for international businesses seeking to establish a presence in Dubai and the UAE. The inflow of FDI brings not only capital but also expertise. technology, and best practices from around the world. These spillover effects positively impact the local economy by boosting productivity through knowledge transfer, technology diffusion, and the creation of linkages with domestic businesses.

Furthermore, DMCC's presence generates indirect supply chain benefits. As companies within the free zone engage in trade and business activities, they create demand for goods and services from local suppliers and service providers. This leads to a multiplier

effect throughout the supply chain, benefiting a wide range of industries and businesses in Dubai and the UAE. The increased economic activity and demand generated by DMCC and its stakeholders contribute to improved productivity and economic performance at both the local and national levels.

Commodities such as diamonds, coffee, and tea form the cornerstone of DMCC's economic contribution. As the largest diamond trading hub in the world, Dubai's diamond trade reached US\$38.3 billion last year, representing a five-year compound annual growth rate of 11 per cent. Polished diamonds traded in the United Arab Emirates grew 32 per cent to US\$16.9 billion compared to 2022, which means that Dubai is expanding its focus from predominantly rough diamonds to polished diamonds, which now account for 44 per cent of the total trade value.

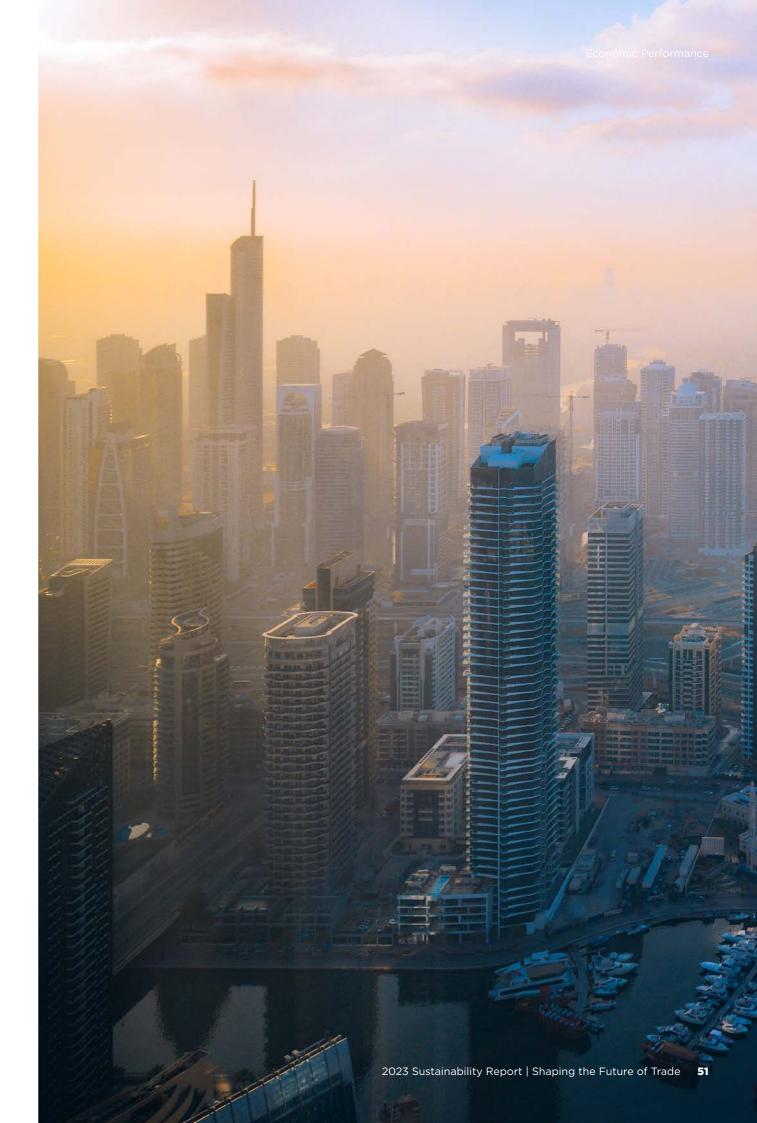
Additionally, DMCC plays a pivotal role in facilitating the growth and development of the coffee and tea industries, supporting trading, manufacturing, and distribution activities. Through its robust infrastructure and favourable business environment, DMCC continues to drive economic growth and establish itself as a global leader in commodity trading.

DMCC's unique mix of residential and commercial properties fosters a vibrant atmosphere where people can live and work in close proximity, creating a dynamic community. The implementation of sustainability initiatives, including solar shading, smart meters, smart bins, and movement sensors, improves the environmental performance of DMCC properties.

The economic impact of DMCC extends to the member companies within its free zone, contributing to the overall economy through their supply chains. While specific financial data is not publicly disclosed, DMCC's focus is on facilitating business growth in Dubai and fostering a thriving business ecosystem.

DMCC aligns its operations with industry best practices and international regulations. Despite not being subject to the General Data Protection Regulation (GDPR), DMCC implements measures to uphold data privacy and protection. Collaborating with organisations like the Financial Action Task Force (FATF), DMCC enhances transparency and compliance with international regulations, demonstrating its commitment to responsible business practices.

Through its efforts, DMCC aims to have a significant indirect economic impact in line with the UAE's national strategy, promoting sustainable economic growth and contributing to the broader economy.



Customer Excellence **Labour Practices** 

# **CUSTOMER EXCELLENCE**

At DMCC, we place a strong emphasis on engaging with our customers and stakeholders to gather feedback that enhances the living and working experiences within our community. To ensure the highest standard of customer service, we have established dedicated member success and satisfaction teams tasked with addressing customer concerns and collecting valuable insights.

In addition to conducting annual satisfaction surveys, DMCC has implemented transactional surveys that capture feedback from members at the point of service delivery. These efforts are part of our broader initiative to expand survey coverage, with the goal of evaluating at least 90% of DMCC's services through stakeholder feedback.

Our surveys are facilitated through Salesforce, and a dedicated call centre team is in place to handle service recovery for dissatisfied clients. DMCC is committed to taking prompt corrective actions by developing action plans and KPIs, which are meticulously tracked until their successful implementation.

Based on the feedback we received from our community in 2022, we focused on several key improvements implemented this year:

Initiative	Outcome	Uptown District
Enhancing Contact Centre Efficiency	Optimised our contact center processes by improving the availability and accessibility of information, resulting in quicker response times for our clients.	Improved client experience through reduced response times.
FAIC System Integration	Seamlessly integrated Salesforce with FAIC systems, enabling faster visa processing by directly translating and transferring application details, reducing processing time by 1.5-2 days.	Enhanced efficiency in visa processing, leading to faster service delivery.
DMCC and Marsh Insurance Integration	Implemented a streamlined process for insurance requests, allowing DMCC members to obtain Third Party Liability or Workmen's Compensation Insurance through our member portal within 10 minutes.	Improved accessibility and convenience in obtaining insurance policies.
Loyalty Program	Introduced a highly rewarding Loyalty Program, offering competitive points for services used by DMCC members, thereby enhancing the overall value and engagement of our community.	Increased member value and engagement through a rewarding service experience.
Queue Management System Upgrade	Upgraded the Queue Management System to allow DMCC members to book appointments both physically and virtually, significantly reducing waiting times at the Member Engagement Centre.	Enhanced customer experience through more efficient appointment scheduling and reduced waiting times.

Recognising the importance of maintaining high-quality customer service amidst increasing demands, DMCC is developing a long-term vision and implementing measures to ensure an excellent customer experience. A mystery shopping program provides independent feedback, allowing DMCC to continuously improve its services.

On a broader scale, DMCC's internal audit department plays a crucial role in risk management. By collaborating with each department, the internal audit identifies negative impacts, risks, and opportunities and logs them into the system for remediation. Progress in addressing these issues is regularly reviewed by the Board of Directors.

As a government entity, DMCC primarily focuses on issuing rules and regulations and ensuring their implementation by community members. Compliance with UAE law and grievance mechanisms applicable to Dubai government entities is a core aspect of DMCC's operations, ensuring alignment with national legal frameworks and dispute resolution procedures.

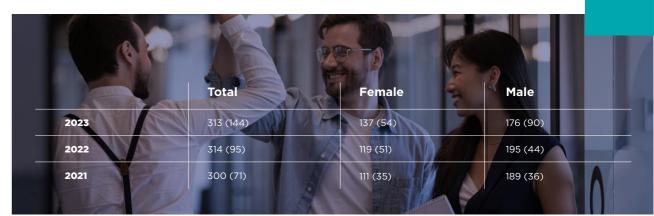
# **LABOUR PRACTICES**

At DMCC, we recognise the vital role that a diverse workforce plays in driving innovation, creativity, and overall well-being within our organisation. We are committed to creating an inclusive environment that supports our employees in achieving a healthy work-life balance. To this end, we offer a comprehensive suite of benefits designed to meet the diverse needs of our

Full-time employees enjoy life insurance, health insurance, various types of leave, and remote working options. Additionally, we provide supplementary perks such as educational allowances for children, comprehensive family insurance coverage, and visa processing assistance. These offerings are central to our reputation as an employer of choice, enabling us to attract top talent from around the globe and fostering a culture of diversity and inclusion.

Given the dynamic nature of our operations and the varying workload requirements, fulltime employment may not be feasible for certain roles within DMCC. To address this, we engage temporary employees, such as administrative staff, IT personnel, and customer service representatives in the DMCC call centre, through direct employers who strictly adhere to the provisions of UAE Labour Law. These temporary staff members are entitled to benefits provided by their employers, which include annual paid leave, sick leave, health insurance, flight allowances, and maternity benefits, among others. This approach ensures that all employees, regardless of their employment status, are afforded the necessary protections and support.

#### OUR EMPLOYEES<sup>26</sup>



We have sustained the momentum gained last year in promoting employee wellbeing through our comprehensive wellness initiatives. In 2023, we organised 33 events and 10 webinars, achieving a notable 21% increase in overall attendance and a 33% increase in attendance per event, with a total of 1,989 attendees participating. These sessions featured subject matter experts and professionals who shared valuable knowledge and conducted training sessions to raise awareness on various aspects of physical, mental, and financial well-being. Additionally, we partnered with well-being clinics, sports facilities, and dining establishments to offer discounts, further supporting our employees in leading healthy and balanced lives.

<sup>26</sup> Employees are located in the UAE, considered the only significant location of our operations. The data is presented in headcount at the end of the reporting period. Temporary employees are presented in brackets. Permanent employees comprise total employees minus temporary employees

**Labour Practices Labour Practices** 

At DMCC, we are acutely aware of the historical challenges associated with human and labour rights in the commodities business, particularly within the tea, coffee, diamond, and gold trades. While we do not have direct control over these industries, our position as a large free zone hosting thousands of businesses allows us to implement numerous initiatives aimed at spreading awareness and promoting best practices in sustainability and supply chain management. As part of our commitment to ethical practices, we adhere to the principles of the United Nations Global Compact (UNGC) and the UN Guiding Principles on Business and Human Rights, ensuring the respect of human rights throughout our business ecosystem.

Employee compensation at DMCC is structured with a clear breakdown: the basic salary constitutes 60% of the total remuneration. the housing allowance makes up 28%, and the transportation allowance accounts for 12%.

Emirati employees additionally receive a national allowance in accordance with local regulations. We are proud to uphold pay equity and gender equality, with the ratio of basic salary and remuneration between women and men in each employee category at DMCC standing at 1:1.

In line with UAE law, only Emirati citizens are eligible for pension contributions. Accordingly, DMCC contributes 5% of the employee's basic salary, housing allowance, and national allowance to the pension fund. The Dubai government further augments this contribution with an additional 15%, ensuring a robust retirement benefit for eligible employees.

We are also pleased to report that no incidents of discrimination were reported within DMCC during the reporting period, underscoring our unwavering commitment to fostering an inclusive, respectful, and supportive working environment for all our employees.

#### **EMPLOYEE TURNOVER**

During the 2023 reporting period, DMCC experienced a total of 68 employee departures. This includes 33 employees who left the company voluntarily and 35 blue-collar workers from our Tea and Coffee Centres whose roles were transitioned to outsourced positions. These changes resulted in a turnover rate of 21.7%, calculated based on an average workforce of 313 permanent employees. While our overall headcount remained stable, these adjustments were made to optimise operational efficiency and manage costs effectively in line with industry best practices.

	Total number of new employee hires entering employment during the reporting period	Total number of employees leaving employment during the reporting period
Total	67	68
Breakdown by gender		
Male	30	49
Female	37	19
Breakdown by age		
Under 30 years old	20	11
30-50 years old	45	45
Over 50 years old	2	12

#### **DIVERSITY AND INCLUSION**

Diversity is embedded in our business as we cater to international customers, residents, and visitors. Our staff proudly represents 44 nationalities, with 30% of executive and senior management hired from the local community<sup>27</sup>. DMCC provides a safe and encouraging environment in which employees can share and broaden their understanding of other cultures. We would also like to report that no incidents of discrimination were reported in 2023.

#### **GENDER EQUALITY**

We were the first free zone in the country to become a WEPs signatory and have made a concerted effort toward a 'top to bottom' gender balance in our workforce. This year we signed up for a pledge by the UAE Gender Balance Council (GBC) and committed to reporting the data and collaborating with the UAE GBC on enhancing women's empowerment in the UAE. As a signatory to the WEPs, we continually integrate SDG 5 as part of our corporate strategy.

	2021	2022	2023
Employees entitled to parental leave	300	314	313
Male	189	195	176
Female	111	119	137
Employees that took parental leave	6	14	17
Male	5	8	11
Female	1	6	6
Employees that returned to work in the reporting period after parental leave ended	7	14	16
Male	5	8	11
Female	2	6	5
Employees that returned to work after parental leave ended that were still employed 12 months after their return to work	15	6	12
Male	5	5	6
Female	10	1	6
Retention rates of employees that took parental leave			
Male	100%	100%	100%
Female	111%28	100%	100%

<sup>&</sup>lt;sup>27</sup> DMCC defines the local community as citizens of the United Arab Emirates.

<sup>&</sup>lt;sup>28</sup> One employee from the previous reporting period returned in the current, affecting the calculations.

# TALENT ATTRACTION, DEVELOPMENT AND RETENTION

Our services are diverse and require various skill sets and expertise. We know that to stay competitive and offer the best quality to our customers, we must invest in our staff's development and happiness.

Therefore, we continue to offer significant learning and growth opportunities for our colleagues for non-supervisory roles, Leadership for non-supervisory roles, Leadership for Managers, Customer Excellence for client-facing roles and Sales Academy for employees anytime, anywhere, through any device.

We use the Learning Management System (LMS) as a digital solution for all learning and development needs. The solution acts as a learning gate for employees to access all training and development courses and materials in different formats. We also offer our employees four DMCC Academies: Leadership for non-supervisory roles, Leadership for Managers, Customer Excellence for client-facing roles and Sales Academy for employees working in the sales sector.

#### **KEY ACHIEVEMENTS OF 2023 INCLUDE:**

- 5,577 training hours (2,147 male and 1,856 female)
- 12.7 hours of training per employee (20 on average among female employees, 19 on average among male employees)
- Participation in a diverse set of career fairs across the region to ensure equal opportunities are given to fresh graduates

	Executive and Senior Management <sup>29</sup>	Middle Management	Staff	Total
Total number of training hours	938	1,420	3,219	5,577
Employees received regular performance and career development reviews	47	64	202	313 (100%)
Breakdown by gender				
Male	74%	52%	62%	176
Female	26%	48%	38%	137
Breakdown by age				
Under 30 years old	0% (0)	3% (2)	19% (38)	29
30-50 years old	77% (36)	88% (56)	74% (150)	241
Over 50 years old	23% (11)	9% (6)	7% (14)	34

<sup>&</sup>lt;sup>29</sup> Executive and senior management includes department heads, directors, and c-level employees. Middle management includes managers and senior managers. Staff includes all other employees.



# RESPONSIBLE BUSINESS ECOSYSTEM

# **DIGITALISATION**

At DMCC, our mission to prioritise and innovate in the digitalisation of our services and internal processes continues to drive our commitment to delivering exceptional service, enhancing employee satisfaction, and strengthening our overall value proposition

to stakeholders. In 2023, we made significant strides in our digital transformation journey, executing key initiatives that have reshaped our digital landscape and solidified our position as a leader in technological innovation.

#### **KEY DIGITAL TRANSFORMATION INITIATIVES**

Throughout the year, our focus was on implementing cutting-edge digital solutions that not only increased productivity but also significantly improved customer experience, mitigated security risks, and ensured business continuity. We successfully delivered over 80 digital enhancements across various business units, leveraging technology to streamline processes, optimise operations, and enrich the overall digital ecosystem at DMCC.

One of our flagship projects was the continued development and rollout of Oracle Fusion Cloud. In 2023, we achieved key milestones, including the launch of the Learning Management Solution in June and the commencement of the Enterprise Performance Management project in September. These initiatives are scheduled for full deployment in 2024 and are expected to greatly enhance our organisational efficiency. decision-making capabilities, and employee experience.

#### **ADVANCING BUSINESS PROCESSES AND CUSTOMER EXPERIENCE**

In our efforts to simplify and optimise business operations, we integrated the Dubai Unified License (DUL) system, which facilitates seamless data exchange and provides a centralised, trusted digital platform for stakeholders. We also revolutionised our onboarding experience by upgrading to Salesforce Lightning, significantly improving user experience and agility in future updates. Additionally, we automated the issuance of third-party liability and workmen's compensation policies through Marsh, streamlining the licensing process and offering customers a wider range of insurance options.

#### **INNOVATING ACROSS ECOSYSTEMS AND** COMMODITIES

Our commitment to digital innovation extended to our commodities divisions, where we achieved significant milestones. At the DMCC Coffee Centre, we completed the implementation of a Warehouse Management System (WMS) powered by Salesforce, which optimised warehousing and production processes. The successful launch of the coffee production module in 2023 marked the culmination of this digital transformation journey, enhancing visibility, efficiency, and control across the supply chain.

Similarly, we implemented a bullion coin order tracking and invoicing solution on Salesforce, streamlining the ordering process and providing businesses with better visibility and control over their orders.

#### **ENHANCING SECURITY AND OPERATIONAL EXCELLENCE**

Security remains a top priority at DMCC. In 2023, we consolidated and migrated our IT Data Centre from Almas Tower to our new Uptown Tower headquarters, bringing numerous benefits, including improved performance, scalability, and security. This complex migration required careful planning and coordination, and it was executed with minimal disruption to our operations.

We also maintained our strong focus on governance and compliance, successfully closing all identified gaps as per the Dubai Information Security Regulation (ISR) standards and achieving recertification for

ISO 27001, valid until 2026. Our dedication to cybersecurity was further demonstrated through regular audits, threat assessments, and the implementation of advanced threat detection and prevention measures.

#### **SUSTAINABILITY INITIATIVES**

In our pursuit of a paperless organisation, we made significant progress in reducing paper usage, which not only saves costs but also supports our environmental sustainability goals. Additionally, our responsible e-waste management efforts resulted in the ecofriendly disposal of over 1,600 kilograms of electronic waste, contributing to the UAE's "Zero Landfill" initiative.

Our digitalisation efforts in 2023 have been instrumental in maintaining DMCC's leadership in technological innovation, delivering exceptional services, and enhancing the digital experience for our customers and stakeholders. As we look ahead, we remain committed to pushing the boundaries of digital excellence, ensuring that DMCC continues to thrive in an increasingly digital world.

# **SUPPLY CHAIN SUSTAINABILITY** AND RESPONSIBLE SOURCING

#### **COMMITMENT TO GLOBAL STANDARDS AND** SUSTAINABLE PROCUREMENT

As a facilitator of trade across multiple industries, DMCC is committed to maintaining high standards and promoting best practices. Our active participation in global organisations, such as the Organisation for Economic Cooperation and Development (OECD), the World Diamond Council, and the Kimberley Process (KP), underscores our dedication to upholding stringent trade standards. Notably, we have maintained the ISO 9001 certification for the UAE Kimberley

Process office, reinforcing our commitment to excellence.

In line with our sustainability goals, DMCC prioritises responsible procurement practices. All tenders conducted through our digital procurement system, Tejari, integrate both technical and commercial scoring. For expenditures between AED 25,000 and AED 500,000, a mandatory "best value" approach is used, while spends exceeding AED 500,000 require the use of the e-procurement portal. This approach ensures that only technically qualified vendors proceed to the commercial stage, where the project is awarded to the lowest compliant bid.

#### **VENDOR QUALIFICATION** AND ETHICAL CONDUCT

DMCC ensures that all vendors meet stringent qualification criteria, including trade license validity, insurance coverage, and compliance with our Standard Base Contract terms and the DMCC Code of Conduct. Additionally, every supplier is screened for environmental and social responsibility, with a focus on mitigating any potential negative impacts on the supply chain. Our Supplier Code of Conduct further enforces compliance with laws regarding equal opportunities, child and forced labour, and fair wages, ensuring ethical practices throughout our procurement processes.

Every supplier going through the tender process was screened using environmental criteria through the questionnaire, which serves as a proxy for us to evaluate suppliers' negative social impacts on the supply chain<sup>30</sup>. As part

of the procurement calculation methodology, we consider any supplier with a UAE trade license operating within the country with locally hired staff as a local supplier. No official preference to local suppliers was given, however the default position is to always priortise local vendors before approaching international markets. Our Supplier Code of Conduct sets forth clear expectations for all suppliers, requiring compliance with applicable laws and regulations related to equal opportunities, child labour, forced labour, human trafficking, working hours, and fair wages. Through our evaluation and review processes, we ensure that DMCC does not engage with suppliers at significant risk for incidents of child, forced, or compulsory labour.

By adhering to these rigorous standards and practices, we actively contribute to fostering responsible and sustainable trade within our ecosystem, promoting ethical conduct, and ensuring that our supplier network operates in alignment with our values and principles.

#### **FUTURE ENHANCEMENTS** IN PROCUREMENT

Looking ahead, DMCC plans to update its procurement policy to include measurable and quantifiable sustainability assessments of our suppliers. This enhancement will ensure

that our procurement practices continue to align with our commitment to ethical, responsible, and sustainable trade.

#### PROCUREMENT BUDGET SPENT ON LOCAL SUPPLIERS

Year	2021	2022	2023
Local suppliers 31	564,817,666.88	909,740,871.26	709,827,988
International suppliers	17,781,957	25,481,619.80	28,891,224
Percentage	97%	97%	96%

#### SUPPORT FOR **DECARBONISATION** IN THE GOLD MINING **SECTOR**

In 2023, DMCC further demonstrated its commitment to sustainability by supporting critical research aimed at reducing greenhouse gas emissions within the gold mining industry and supply chain.

Through financial contributions to the Decarbonisation - Gold Mining Report, prepared by Dr. Saleem Ali and Ms. Shaghayegh Jabalameli, DMCC has enabled a comprehensive analysis of carbon emissions across various stages of gold production and the development of strategies for emission reduction. This research underscores

the importance of adopting innovative technologies and practices to achieve significant carbon footprint reductions in the sector.

By backing this initiative, DMCC is not only advancing its own sustainability goals but also contributing to global efforts to combat climate change. The insights from this report will serve as a valuable resource for the gold mining industry, helping to drive the transition towards a low-carbon economy.

<sup>30</sup> In total, 135 suppliers were assessed for environmental impacts versus 60 last year.

<sup>31</sup> DMCC Defines Local Suppliers as the entities that have in-country operations and conduct transactions in UAE Dirhams

# **ETHICAL BUSINESS**

We prioritise the integrity and security of our business ecosystem, ensuring that our technical infrastructure safeguards our customers' privacy and upholds robust anticorruption measures. In 2023, we conducted comprehensive Fraud Risk Assessments across the entire organisation, and the results indicated no significant risk.

DMCC has implemented anti-corruption policies and procedures, which have been communicated to all employees and board members. Confirmation of understanding and knowledge of these policies has been obtained from everyone. While no additional training has been conducted in the current year, we have plans to organise training sessions in 2023 to reinforce awareness and understanding of anticorruption measures.

Our internal audit department conducts regular assessments to identify and mitigate risks related to anti-corruption. We are pleased to confirm that there have been no reported corruption cases within the reporting period, demonstrating our commitment to maintaining a culture of integrity and ethical conduct.

As a government entity in Dubai, DMCC is dedicated to ensuring compliance with laws and regulations in accordance with our organisationwide responsibility and risk management policy. Each division within DMCC has the responsibility to report and escalate any risk matters in alignment with the established risk management framework. To the best of our knowledge, DMCC has not encountered any incidents of noncompliance with laws or regulations.

To further enhance our compliance efforts, DMCC will establish a comprehensive register capturing all legislation, laws, and regulations that the organisation is mandated to follow by December 2023. This will serve as a valuable resource to maintain an up-to-date understanding of our legal obligations and reinforce our commitment to adherence and accountability.



# GRI CONTENT INDEX

GRI Standard / Other Sources	Disclosure	Section	Page Number(s)		Omissions
			,	Requirement(s) Omitted	Explanation
General disclosures					
GRI 2: General Disclosures 2021	2-1 Organisational details	DMCC at Glance	10-13		
	2-2 Entities included in the organisation's sustainability reporting	DMCC at Glance	10-13		
	2-3 Reporting period frequency and contact point	About this Report	5		
	2-4 Restatement of information	About this Report	4		
	2-5 External assurance	Assurance Statement	6-7		
	2-6 Activities, values chain and other business relationship	DMCC at Glance	10-13		
	2-7 Employees	Labour Practice	53- 56	Requirement (b. V)	Not applicable, no part-time employee
	2-8 Workers who are not employees	Occupational Health & Safety	39-41	Requirements(a), (b) (c)	Data is not available as DMCC doesn't have a system or methodology to calculate it.
	2-9 Governance structure and composition	Governance & Leadership	46- 48		
	2-10 Nomination and selection of the hghest governance body	Governance & Leadership	46- 48		The nomination and selection of the members of the Board are subject to the decision of the Ruler of Dubai in line with Decree No. 28 of 2015 Concerning the Governance of the Boards and Committees Affiliated to the Government
	2-11 Chair of the highest governance body	Governance & Leadership	46- 48		
	2-12 Role of the highest governance body in overseeing the management of impacts	Governance & Leadership	46- 48		
	2-13 Delegaion of responsibility for managing impacts	Governance & Leadership	46- 48		
	2-14 Role of the highest governance body in sustainability reporting	Governance & Leadership, Our Materiality Approach	46- 48, 17- 20		
	2-15 Conflict of interest	Governance & Leadership	46- 48	Requirement (b)	Omitted due to confidentiality
	2-16 Communication of critical concerns	Governance & Leadership, Ethical Business	46- 48, 62	Requirement (b)	As DMCC is a government entity, this disclosure is omitted due to confidentiality constrains.
	2-17 Collective knowledge of the highest governance body	Governance & Leadership	47		
	2-18 Evaluation of the performance of the highest governance body	Governance & Leadership	46- 48	Requirement, (a), (b), (c)	The information on the evaluation process and criteria cannot be disclosed due to confidentiality.

GRI Standard / Other Sources	Disclosure	Section	Page Number(s)	Omissions	
				Requirement(s) Omitted	Explanation
	2-19 Remuneration policies			Requirement, (a), (b)	As DMCC is a government entity, this disclosure is omitted due to confidentiality constrains.
	2-20 Process to determine remuneration		53-55, 62	Requirements (a), (b)	As DMCC is a government entity, this disclosure is omitted due to confidentiality constrains.
	2-21 Annual total compensation ratio			Requirement, (a), (b), (c)	As DMCC is a government entity, this disclosure is omitted due to confidentiality constrains.
	2-22 Statement on sustainable development strategy	Sustainability at DMCC	15-16		
	2-23 Policy Commitment	Governance & Leadership	48		
	2-24 Embedding policy commitments	Governance & Leadership	46- 48		
	2-25 Processes to remediate negative impacts	Customer Satisfication& Engagement	52		
	2-26 Mechanisms for seeking advice and raising concerns	Customer Satisfication& Engagement	52		
	2-27 Compliance with laws and regulations	Ethical Business Conduct	52, 62		
	2-28 Membership associations	About this Report	4		
	2-29 Approach to stakeholder engagement	DMCC at Glance, Our Materiality Approach	10- 13, 17- 20		
	2-30 Collective bargaining agreements				Collective bargaining agreements are prohibited under UAE labour law
Material Topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topic	Our Materiality Approach	17-20		
	3-2 list of Material topics	Our Materiality Approach	17-20		
Governance & Lease	dership				
GRI 3: Material Topics 2021	3-3 Management of Material Topics		17-19, 33, 46- 48, 52-53, 59-62	Requirement (e.iii)	Omitted due to confidentiality
Economic Performa	nce				
GRI 3: Material Topics 2021	3-3 Management of Material Topics	Economic Performance, Governance& Leadership	17-19, 49- 50, 46- 48		

GRI Standard / Other Sources	Disclosure	closure Section Page Number(s)		C	omissions
				Requirement(s) Omitted	Explanation
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed				As DMCC is a government entity, this disclosure is omitted due to confidentiality constrains.
	201-2 Financial implications and other risks and opportunities due to climate change				DMCC has not identified any risks or opportunities posed by climate change. DMCC currently does not have system in place to calculate the financial implications or cost, or to make revenue projections.
	201-3 Defined benefit plan obligations and other retirement plans	Labour Practices	53- 55		
	201-4 Financial assistance received from government				It is not applicable as DMCC is a government entity.
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Economic Perfromance	11, 22- 25, 49- 50		
	203-2 Significant indirect economic impacts	Economic Perfromance	49- 50		
Talent attraction, Dev	velopment & Retention				
GRI 3: Material Topics 2021	3-3 Management of Material Topics		56, 17-19		
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage				As DMCC is a government entity, this disclosure is omitted due to confidentiality constrains.
	202-2 Proportion of senior management hired from the local community	Talent attraction, Development& Retention	56		
GRI 404: Training & Education 2016	404-1 Average hour of training per year per employee	Talent attraction, Development& Retention	56	Requirement (a)	The existing system doesn't provide information related to this requirement.
	404-2 Programs for upgrading employee skills and transition assistance programs	Talent attraction, Development& Retention	56	Requirement (a)	The existing system doesn't provide information related to this requirement.
	404-3 Percentage of employees receiving regular performance and career development reviews	Talent attraction, Development& Retention	56		
Customer Excellence	& Engagement				
GRI 3: Material Topics 2021	3-3 Management of Material Topics		52, 17-19, 37		

GRI Standard / Other Sources	Disclosure	Section	Page Number(s)	Omissions	
				Requirement(s) Omitted	Explanation
Labour Practices					
GRI 3: Material Topics 2021	3-3 Management of Material Topics		53- 54, 60		
GRI 401: Employement 2016	401-1 New employee hires and employee turnover	Labour Practice	53- 56		
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Labour Practice	53- 56		
	401-3 Parental leave	Labour Practice	53- 56		
GRI 405: Diversity & Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Labour Practice	53- 56		
	405-2 Ratio of basic salary and remuneration of women to men	Labour Practice	53- 56		
GRI 406: Non- discrimination 2016	406 Non-discrimination 2016	Labour Practice	53- 56		
Sustainable City					
Climate Change & En	ergy				
GRI 3: Material Topics 2021	3-3 Management of Material Topics		17-19, 21-33, 36-37		
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Energy, Water, and Waste Management	21- 32		
	302-2 Energy consumption outside of the organization	Energy, Water, and Waste Management	21- 32		
	302-3 Energy intensity	Energy, Water, and Waste Management	21- 32		
	302-4 Reduction of energy consumption	Energy, Water, and Waste Management	21- 32		
	302-5 Reductions in energy requirements of products and services	Energy, Water, and Waste Management	21- 32		
GRI 305: Emission 2016	305-1 Direct (Scope 1) GHG emissions	Energy, Water, and Waste Management	33- 36		
	305-2 Energy indirect (Scope 2) GHG emissions	Energy, Water, and Waste Management	33- 36		

GRI Standard / Other Sources	Disclosure	Section	Page Number(s)	Omissions	
				Requirement(s) Omitted	Explanation
	305-3 Other indirect (Scope 3) GHG emissions	Energy, Water, and Waste Management	33- 36		
	305-4 GHG emissions intensity	Energy, Water, and Waste Management	33- 36		
	305-5 Reduction of GHG emissions 305-6 Emissions of ozone-depleting substances (ODS)	Energy, Water, and Waste Management	33- 36		This disclosure is not applicable due to the DMCC industry.
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Energy, Water, and Waste Management	33- 36		This disclosure is not applicable due to the industry of DMCC.
Water Effluents					
GRI 3: Material Topics 2021	3-3 Management of Material Topics		17-19, 21-33, 36-37		
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	Energy, Water, and Waste Management	21- 32		
	303-2 Management of water discharge- related impacts	Energy, Water, and Waste Management			The Material Topic is not applicable due to the nature of the company's operations.
	303-3 Water withdrawal	Energy, Water, and Waste Management			The Material Topic is not applicable due to the nature of the company's operations.
	303-4 Water discharge	Energy, Water, and Waste Management			The Material Topic is not applicable due to the nature of the company's operations.
	303-5 Water consumption	Energy, Water, and Waste Management	21- 32		
Waste Management					
GRI 3: Material Topics 2021	3-3 Management of Material Topics		17-19, 21-33, 36-37		
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Energy, Water, and Waste Management	21- 32		
	306-2 Management of significant waste-related impacts	Energy, Water, significant Management Management	21- 32		
	306-3 Waste generated	Energy, Water, significant Management Management	21- 32		

GRI Standard / Other Sources	Disclosure	Section	Page Number(s)	Omissions	
				Requirement(s) Omitted	Explanation
	306-4 Waste diverted from disposal	Energy, Water, significant Management Management	21- 32		
	306-5 Waste directed to disposal	Energy, Water, significant Management Management	21- 32		
Occupational Healt	h & Safety				
GRI 3: Material Topics 2021	3-3 Management of Material Topics		17-19, 25, 38-41		
GRI 403: Occupational Health & Safety 2018	403-1 Occupational health and safety management system	Occupational Health& Safety	38- 41		
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational Health& Safety	38- 41		
	403-3 Occupational health services	Occupational Health& Safety	38- 41		
	403-4 Worker participation, consultation, and communication on occupational health and safety	Occupational Health& Safety	38- 41		
	403-5 Worker training on occupational health and safet	Occupational Health& Safety	38- 41		
	403-6 Promotion of worker health	Occupational Health& Safety	38- 41		
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational Health& Safety	38- 41, 54-55		
	403-8 Workers covered by an occupational health and safety management system	Occupational Health& Safety	38- 41		
	403-9 Work-related injuries	Occupational Health& Safety	38- 41		
	403-10 Work-related ill health	Occupational Health& Safety	38- 41		
Community & Givin	g	1	1	1	1
GRI 3: Material Topics 2021	3-3 Management of Material Topics		17-19, 25, 37, 43- 44		

GRI Standard / Other Sources	Disclosure	Section	Page Number(s)	Omissions	
				Requirement(s) Omitted	Explanation
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Community Engagment, DMCC at Glance, Our Materiality Approach	43- 44, 10- 13, 17- 20		
	413-2 Operations with significant actual and potential negative impacts on local communities	Community Engagment, DMCC at Glance	43- 44, 10-13		
Responsible Busines	s Ecosystem				
Supply Chain Sustain	nability & Responsible Sourcing				
GRI 3: Material Topics 2021	3-3 Management of Material Topics		17-19, 37, 60- 61		
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Supply Chain Sustainability & Responsible Sourcing	60- 61		
GRI 308: Supplier Environmental Assessment 2016	308-1 New Suppliers that were screened using environmental criteria	Supply Chain Sustainability & Responsible Sourcing	60- 61		
GRI 408: Child Labour 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Supply Chain Sustainability & Responsible Sourcing	60- 61		
GRI 409: Forced or Compulsory Labour 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Supply Chain Sustainability & Responsible Sourcing	60- 61		
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Supply Chain Sustainability & Responsible Sourcing	60- 61		
	308-2 Negative environmental impacts in the supply chain and actions taken	Supply Chain Sustainability & Responsible Sourcing			
GRI 407: Freedom of Association & Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk				The majority of our suppliers are based in the UAE where collective bargaining is prohibited
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Supply Chain Sustainability & Responsible Sourcing	60- 61		
	414-2 Negative social impacts in the supply chain and actions taken	Supply Chain Sustainability & Responsible Sourcing	60- 61		

GRI Standard / Other Sources	Disclosure	Section	Page Number(s)	Omissions	
				Requirement(s) Omitted	Explanation
Ethical Business Con	duct				
GRI 3: Material Topics 2021	3-3 Management of Material Topics		17-19, 60, 62		
GRI 205: Anti Corruption 2016	205-1 Operations assessed for risks related to corruption	Ethical Business Conduct	62		
	205-2 Communication and training about anti-corruption policies and procedures	Ethical Business Conduct	62		
	205-3 Confirmed incidents of corruption and actions taken	Ethical Business Conduct	62		
GRI 206: Anti- Competitive Practices 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices		62		As DMCC is a government entity, this disclosure is not applicable.
GRI 417: Marketing & Labeling 2016	417-1 Requirements for product and service information and labeling	Ethical Business Conduct	62		The disclosure is not applicable due to the industry of DMCC.
	"417-2 Incidents of non-compliance concerning product and service information and labeling"	Ethical Business Conduct	62		
	"417-3 Incidents of non-compliance concerning marketing communications"	Ethical Business Conduct	62		
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Responsibel Business Ecosystem	60- 62		

