

A nighttime cityscape featuring a prominent skyscraper with a glowing top section. The scene is overlaid with a complex network of white lines connecting various points, suggesting a digital or trade network. The overall color palette is dominated by blues and teals.

DMCC

# 2024 SUSTAINABILITY REPORT

A horizontal bar consisting of four colored segments: teal, light blue, purple, and dark blue.

Shaping  
the Future  
of Trade

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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 Equality. 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](http://www.dmcc.ae/sustainability).

## RESTATEMENT OF INFORMATION

In 2023, data on Treated Sewage Effluent (TSE) consumption could not be obtained due to faulty meter readings. As a result, an estimate was reported in the previous reporting cycle. The accurate consumption data has since been captured and is reflected in the current reporting cycle to ensure reliable year-on-year performance tracking.

For the 2023 reporting cycle, DMCC reviewed and verified waste management data provided by the facility management team for One JLT. Following this review, the waste generation and recycling figures have been updated to ensure greater accuracy and alignment with reported performance metrics.

## STRUCTURE AND MATERIALITY

The layout of the report mirrors our sustainability strategy and illustrates how we act, measure, and manage it within our co-dependent 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

These 8 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 2024 to 31 December 2024. 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

EY provided a limited independent assurance under ISAE 3000 (Revised) on preparing this report in accordance with the GRI Standards. EY 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 EY's recommendations help us improve. For the scope of work and observations, please refer to the independent limited Assurance report shown on page 8 of this Report.



Share your feedback on our sustainability efforts at [sustainability@dmcc.ae](mailto:sustainability@dmcc.ae)



Shape the future  
with confidence

# INDEPENDENT PRACTITIONER'S ASSURANCE REPORT

## TO THE MANAGEMENT OF DUBAI MULTI COMMODITIES CENTRE AUTHORITY

### 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 energy consumption, Greenhouse Gas Emissions - Scopes 1 & 2 and DMCC's staff gender diversity (the "Subject Matter") contained in DMCC's (the "Company's") 2024 Sustainability Report for the year ended December 31, 2024 (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 DMCC's energy consumption, Greenhouse Gas Emissions - Scope 1 & 2 and DMCC's staff gender diversity, 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 April 21, 2025. 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 DMCC's energy consumption, Greenhouse Gas Emissions - Scope 1 & 2 and DMCC's staff gender diversity 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 DMCC's energy consumption, Greenhouse Gas Emissions - Scopes 1 & 2 and DMCC's staff diversity for the year ended December 31st, 2024, 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 2024 Sustainability report and is not intended to be and should not be used by anyone other than those specified parties.

**Anthony O'Sullivan**



December 29, 2025  
Dubai, UAE



**APPENDIX A - DATA TABLE:  
SUBJECT MATTER FOR FY2024**

SR.	KPI	GRI REFERENCE	VALUE	UNIT
1	Direct (Scope 1) GHG emissions	305-1	2,129.97	tCO2e
2	Energy Indirect (Scope 2) GHG emissions	305-2	13,590.68	tCO2e
3	Electricity Consumption <sup>1</sup>	302-1	30,255,172	kWh
4	Purchased Cooling	302-1	11,365,806	RTh
5	Fuel Consumption (Petrol)	302-1	28,873	Liter
6	Fuel Consumption (Diesel)	302-1	104,955	Liter
7	Gender diversity (female) <sup>2</sup>	405-1	44	%

<sup>1</sup> This covers self-generated electricity (solar) and electricity purchased from the grid.  
<sup>2</sup> This is the female percentage share of the total active full-time employees as of December 31, 2024.

# EXECUTIVE STATEMENT



The world is undergoing profound transformation. Climate change, rapid technological shifts, and geopolitical realignment are reshaping global trade and investment. In this environment, the ability to drive growth while building resilience is critical.

Dubai has long excelled at striking this balance. Guided by clear ambition and pragmatic policymaking, the emirate continues to define new standards for economic competitiveness and sustainability. The Dubai Economic Agenda, D33, embodies this vision: to double the size of the economy within a decade while establishing Dubai as one of the world's most sustainable and future-ready cities.

As a key government entity at the heart of global trade, DMCC is a central pillar of this agenda – building essential infrastructure, enabling new industries, and driving sustainable and inclusive growth. Today, we are home to more than 25,000 companies from over 180 countries, contributing around 15% of Dubai's annual FDI inflows and approximately 7% of its GDP. These figures reinforce our position, but also our responsibility to ensure that growth is both competitive and sustainable.

In 2024, we built on this foundation. This is our second consecutive year of reporting greenhouse gas (GHG) emissions, aligned with the UAE's Net Zero by 2050 strategy. Having established a strong emissions baseline,

we are shifting from measurement to active management, embedding decarbonisation across our operations.

In 2025, we will launch a comprehensive GHG Management System – a framework that standardises how every business unit measures, reduces, and reports emissions. With clear KPIs and governance, it will anchor sustainability in decision-making and performance across the organisation.

But systems alone are not enough. People drive change. That is why we expanded our Carbon Literacy Programme to build a culture of awareness and accountability among our employees in order to equip them with the knowledge to turn strategy into impact.

**Ahmed Bin Sulayem**  
Executive Chairman and CEO, DMCC

**Feryal Ahmadi**  
Deputy CEO & COO, DMCC

At the district level, our Smart and Sustainable District Strategy guides the evolution of our urban environment. In JLT, we have upgraded district cooling systems, installed smart lighting, expanded mobility options, and developed the UAE's largest solar car park – all aimed at cutting emissions while improving quality of life.

Uptown Dubai reflects sustainability by design. Uptown Tower, our headquarters and the first of nine towers in the new district, has achieved LEED Gold Certification for building design and construction. Every component – from materials to energy and water systems – showcases our commitment to responsible development.

We are also advancing sustainability at the ecosystem level. Through the DMCC Sustainability Hub, now in its second year, we are helping companies embed ESG principles and access tools and partnerships that support their transition.

This collective approach underlines our belief that sustainability is not a differentiator but an imperative.

Across our industry ecosystems, from precious metals and agri-commodities to tech and energy, we are seeing growing adoption of clean technologies, circular models, and digital solutions that drive transparency and efficiency across value chains. These shifts align with the UAE's wider green growth strategy, demonstrating how our role in global trade directly supports national and international sustainability goals.

Looking ahead, our direction is clear. DMCC will continue to define what it means to be a sustainable global business district: data-driven, future-focused, and internationally connected. We will deepen our contribution to the D33 Agenda by strengthening high-impact industries and by keeping sustainability embedded at every level of our growth story.



**DMCC'S SUSTAINABILITY HUB HELPS COMPANIES EMBED ESG PRINCIPLES AND ACCESS TOOLS AND PARTNERSHIPS THAT SUPPORT THEIR TRANSITION.**

# DMCC AT A GLANCE

## WHO WE ARE

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

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

## OUR VALUES

### HIGH PERFORMANCE

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

### COMMITTED

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

### BOUNDLESS

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

### COLLABORATIVE

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

### CLARITY

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

## OUR OPERATIONS

### FREE ZONE

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

### TRADE

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

### COMMUNITY

Almost 100,000 people live, visit, and do business in our vibrant Master Community. We offer modern and beautifully constructed real estate that offers first-rate facilities such as restaurants, hotels, parks, and the 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.

## A GLOBAL HUB FOR COMMODITIES AND ADVANCED TECHNOLOGIES

### Coffee

Metric tonnes of coffee processed in 2024



### Energy

Energy companies



### Gold

Gold and precious metals companies



### Diamonds

Companies across precious stones



### Sustainability

DMCC Sustainability Hub is the leading sustainability platform in the region



### Tech

Members in fully integrated ecosystem for Crypto, Gaming and AI



### Tea

Metric tonnes handled in 2024



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 licences 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

## 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.

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 have conducted a materiality assessment again for 2024 and update our strategy in line with the expectations of our stakeholders.

### Underpinned by the SDGs



## 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 up to 05.% of our 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 award-winning free zone and community as the 'Global Free Zone of the Year' from the Financial Times fDi magazine for nine 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 who 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 or three years by conducting a materiality review.



# OUR MATERIALITY APPROACH

For the 2024 Sustainability Report, DMCC undertook its most extensive and inclusive stakeholder engagement process to date as part of a strengthened, GRI-aligned impact materiality assessment. This year's approach significantly expanded our outreach, deepened the rigour of our analysis, and sharpened our understanding of the impacts associated with our operations and broader value chain. Rooted in the GRI 3: Material Topics (2021) requirements, the process followed an evidence-based, impact-driven approach designed to ensure that DMCC's sustainability priorities reflect the perspectives of those affected by our activities as well as the emerging expectations of regulators, partners, and the wider Dubai community.

The engagement process began with establishing a robust understanding of DMCC's organisational context, its strategic direction, and the sustainability landscape in which it operates. Guided by the DMCC Business Strategy 2024-2033, our team worked with business units

to map the organisation's full range of activities, products, and services across upstream and downstream relationships. All business lines and legal entities were categorised under DMCC's three strategic purposes: **Facilitate Free Zone Services, Manage Property & Community, and Promote a Responsible Business Environment**, to create a clear and consistent framework for assessing where our economic, environmental, and social impacts occur.

To ensure the assessment focused on the areas of greatest significance, each entity was evaluated using a set of quantifiable criteria aligned with GRI's impact-based methodology. These criteria included: contribution to DMCC's revenue, asset portfolio size, percentage of total procurement spend, employee numbers, volume of contracted and subcontracted workers, and the potential magnitude of impacts, positive or negative, on people, the environment, and the economy. This scoring allowed DMCC to determine which entities play the most material role

in shaping our sustainability footprint and therefore warranted deeper analysis and engagement. Entities with consistently low scores were excluded to maintain proportionality and ensure resources were directed where they would yield the greatest insight.

A major enhancement this year was the development of a comprehensive and highly representative stakeholder universe. For each material entity, our assessment identified all potentially affected stakeholders, capturing both Tier 1 (directly affected) and Tier 2 (indirectly affected) groups across DMCC's ecosystem. This exercise resulted in the most detailed stakeholder mapping ever undertaken by DMCC, reflecting the full diversity of individuals and groups connected to our operations, services, community spaces, and economic activity. The approach was grounded in GRI's requirement to consider all parties who experience, contribute to, or have insight into DMCC's impacts, whether as beneficiaries, partners, regulators, employees, customers, or community members.

From this universe, we curated a focused set of Stakeholders in Focus, representing those best-positioned to provide credible insights into DMCC's impacts. The list remained dynamic throughout the

process, allowing newly identified or particularly relevant representatives to be added as engagement progressed. This flexibility ensured that our assessment captured real-world experience and evolving perspectives rather than relying solely on static assumptions. Engagements were scheduled pragmatically to reflect availability, enabling us to include voices that had previously been challenging to reach.

This year's engagement featured an unprecedented breadth of stakeholders, demonstrating DMCC's commitment to inclusivity and authenticity. Internally, we conducted structured interviews with senior management, whose strategic insights helped shape our understanding of DMCC's governance, long-term ambitions, and operational challenges. We also captured the perspectives of employees through surveys that explored workplace wellbeing, diversity and inclusion, learning and development, and operational constraints, providing an important view into the lived experience within DMCC. The external stakeholder outreach was equally comprehensive. We conducted direct interviews with major construction contractors, representing hundreds of workers whose activities shape DMCC's built environment and whose welfare and safety are central to DMCC's social impact. We also engaged

the Uptown Tower hotel operator, whose operations intersect with DMCC's community experience, service standards, safety requirements, and sustainability practices.

A major component of this year's process was engaging the residents, tenants, apartment owners, and visitors in the JLT community. In addition to planned interviews, our sustainability team conducted street-level engagement outside the DMCC Metro station, speaking to individuals who live, work, or commute through the area. This approach allowed us to capture perspectives that are often underrepresented in corporate assessments, ranging from building accessibility and safety to community services, cleanliness, green space, and urban comfort. Many respondents highlighted practical needs and lived experiences that enriched the materiality assessment with grounded, community-level insights.

Engagement also extended to business owners in the JLT district, representing the cafés, retail outlets, service providers, and offices that collectively shape the economic vibrancy of DMCC's community. Their input provided valuable context on customer experience, operational barriers, regulatory interactions, and expectations regarding responsible business practices. To ensure our assessment captured broader societal and knowledge-based

perspectives, we also engaged charitable organisations, as well as local universities and researchers specialising in the built environment and sustainability. These stakeholders offered system-level insights into community needs, emerging climate and environmental considerations, and long-term urban development trends relevant to DMCC's context.

We further engaged our parent company, the Investment Corporation of Dubai (ICD), to understand expectations around governance, national priorities, and alignment with federal sustainability ambitions. In addition, interviews were conducted with waste collection partners, who play a critical role in DMCC's environmental footprint and operational efficiency. Finally, we engaged relevant public authorities, including Dubai Municipality and the UAE Ministry of Climate Change and Environment, to ensure our analysis reflected current regulatory expectations, environmental ambitions, and alignment with the UAE's sustainability agenda.

All insights and evidence gathered from these interactions were consolidated within DMCC's enhanced Material Impact Assessment Tool, which served as the central repository for the assessment. This tool standardised how impacts were recorded, capturing the stakeholder consulted, date of engagement, type of impact (positive/negative; actual/

potential), narrative description, timeframe, and linkage to key themes. It also facilitated preliminary mapping to relevant GRI disclosures and the UN Sustainable Development Goals, ensuring that each impact was contextualised within global sustainability frameworks. Impacts were systematically described using a standard formula ("The impact of [event] leading to [consequence]"), improving comparability and consistency across the assessment. Duplicate impacts were flagged to avoid double counting, ensuring accuracy and traceability.

Each impact was then evaluated using a structured scoring methodology aligned with GRI's criteria of scale, scope, irremediability, and likelihood. Applying a consistent 1-5 scale for each dimension created an objective basis for evaluating the significance of each impact. For negative impacts, the scoring incorporated the additional criterion of irremediability, acknowledging the importance of long-term or irreversible harm. The severity and likelihood scores were plotted on DMCC's impact matrix, which categorised impacts as Material, Review, or Not Material. This methodology allowed DMCC to differentiate between impacts requiring immediate reporting and management attention and those that should be monitored or validated further. The transparent justification for each score enhanced the rigour and auditability of the assessment.

From this analysis, DMCC developed a refined list of material topics, each with a clear definition and mapping to relevant GRI disclosures. The list underwent several layers of internal review, including validation by business lines, sustainability specialists, and governance teams, and was sense-checked against previous years' results and the full GRI topic universe to ensure completeness. The final set of material topics is scheduled for external assurance, reinforcing DMCC's commitment to credible and accurate reporting and ensuring our disclosures meet international standards.

The stakeholder engagement and materiality assessment for this 2024 report mark a significant milestone for DMCC. By expanding the breadth of stakeholders engaged, sharpening the methodological rigour, and embedding an evidence-driven approach to prioritisation, DMCC has built a more accurate and meaningful understanding of its impacts across the economy, the environment, and society. This strengthened foundation ensures that our sustainability efforts respond to the concerns, expectations, and lived experiences of the diverse community we serve, while positioning DMCC to drive long-term, responsible, and inclusive growth aligned with global best practice.

## LIST OF MATERIAL TOPICS AND APPLICABLE GRI DISCLOSURES

MATERIAL TOPIC	DEFINITION	DISCLOSURES
<b>CLIMATE CHANGE &amp; ENERGY</b>	Refers to managing energy use and greenhouse gas (GHG) emissions across DMCC's operations and value chain. This includes improving energy efficiency, exploring renewable energy solutions, and addressing climate-related risks and opportunities. Through these efforts, DMCC supports the UAE's Net Zero by 2050 strategy and helps its members transition towards a low-carbon, resilient economy.	<b>GRI 302</b> - Energy <b>GRI 305</b> - Emissions
<b>COMMUNITY IMPACT &amp; RESIDENT WELLBEING</b>	Refers to fostering a positive impact on the communities and residents connected to DMCC. This entails enhancing quality of life, supporting inclusive social and cultural initiatives, and strengthening DMCC's role as a trusted partner in Dubai's long-term development.	<b>GRI 413</b> - Local Communities
<b>BUSINESS EXCELLENCE</b>	Refers to upholding the highest standards of service, transparency, and accountability in delivering value to members and stakeholders. This entails safeguarding customer trust and data, driving sustained economic performance, and creating positive spillover effects that contribute to Dubai's and the UAE's broader economic development.	<b>GRI 418</b> - Customer Privacy <b>GRI 201</b> - Economic Performance <b>GRI 203</b> - Indirect Economic Impacts
<b>TALENT DEVELOPMENT &amp; INCLUSIVE CULTURE</b>	Refers to attracting, developing, and retaining a skilled and diverse workforce while fostering an inclusive and fair workplace culture. This entails providing equal opportunities, investing in employee learning and career growth, ensuring fair employment practices, and upholding ethical conduct in the marketplace. By empowering people and promoting integrity, DMCC strengthens its role as an employer of choice and a trusted partner in Dubai's long-term economic success.	<b>GRI 401</b> - Employment <b>GRI 404</b> - Training and Education <b>GRI 405</b> - Diversity and Equal Opportunity <b>GRI 206</b> - Anti-competitive Behaviour <b>GRI 202</b> - Market Presence <b>GRI 406</b> - Non-discrimination

<b>ETHICAL BUSINESS CONDUCT</b>	Refers to safeguarding integrity and trust by preventing corruption and protecting the confidentiality of stakeholder information. This entails promoting transparency, ensuring data privacy, and embedding ethical principles into day-to-day operations. Through these efforts, DMCC reinforces confidence among its members and partners while strengthening Dubai's reputation as a secure and responsible business hub.	<b>GRI 205</b> - Anti-corruption <b>GRI 418</b> - Customer Privacy
<b>OCCUPATIONAL HEALTH &amp; SAFETY</b>	Refers to protecting the health, safety, and security of employees, contractors, members, and residents within DMCC. This entails preventing workplace incidents, promoting employee wellbeing, ensuring responsible security practices, and fostering a culture of care across all operations. By prioritising safety and security, DMCC safeguards its people and community while strengthening trust in its role as a responsible business hub.	<b>GRI 403</b> - Occupational Health and Safety <b>GRI 410</b> - Security Practices
<b>SUPPLY CHAIN SUSTAINABILITY AND RESPONSIBLE SOURCING</b>	Refers to ensuring that procurement and supply chain practices are conducted ethically and responsibly. This entails engaging suppliers with integrity, preventing risks related to child labour, forced labour, and violations of workers' rights, and promoting transparency and accountability across all sourcing activities. By upholding responsible sourcing standards, DMCC fosters trust and credibility in its global trade ecosystem.	<b>GRI 204</b> - Procurement Practices <b>GRI 408</b> - Child Labour <b>GRI 409</b> - Forced or Compulsory Labour
<b>WASTE MANAGEMENT</b>	Refers to the responsible handling of waste generated across DMCC's operations and community. This entails reducing waste at source, improving collection and recycling practices, and ensuring safe disposal methods that prevent environmental harm. By advancing effective waste management, DMCC contributes to resource efficiency and supports Dubai's transition towards a more circular economy.	<b>GRI 306</b> - Waste

# SUSTAINABLE CITY

DMCC's strategic location at the heart of Dubai makes it a unique destination that blends business, residential, retail, and leisure across three districts: Jumeirah Lakes Towers, Uptown Dubai, and Jewellery & Gemplex. Together, they form the DMCC Master Community, a thriving ecosystem that enables enterprise while enhancing quality of life for residents and visitors.

DMCC serves several key roles: as the master community developer of the three districts; property developer and manager of physical infrastructure, including business centres, office spaces, industrial assets, a hotel, and numerous F&B outlets.

# MASTER COMMUNITY MANAGEMENT

DMCC manages public spaces across the Master Community by setting operational standards and regulatory frameworks aligned with the Government of Dubai and the UAE's national agenda. Individual buildings remain under the control of their respective owners through building management organisations, with DMCC working closely with all parties to ensure compliance with its rules and regulations.

Community and facility management services are appointed through a public tender. This year, the district has been managed by Concordia. DEWA supplies electricity and water to all assets within the districts, while Bee'ah serves as the primary waste-management provider.

## 2024 COMMUNITY HIGHLIGHTS

### HEALTH & WELLNESS

DMCC welcomed Grip, a new sports facility offering shaded tennis and padel courts, a fitness studio, and other recreational amenities - expanding the range of accessible wellbeing options for the community.

### INFRASTRUCTURE & ACCESSIBILITY

- Delivered additional parking between Clusters O and P.
- Installed four new elevators across Clusters C, E, Q, and S.
- Upgraded pavements, safety barriers, and paintwork to enhance user safety and the public realm.
- As part of the JLT Enhancement Programme, landscaping near the Al Khail Road intersection was improved, creating a more welcoming arrival for residents and visitors.
- Following Dubai's extreme weather events in April 2024, DMCC implemented flood-resilience measures, including upgraded stormwater lines and extended drainage systems.
- Refurbished the Central Park fountain with new motors, dosing systems, and filtration equipment to replace assets damaged during the storms.

### ENERGY & WATER EFFICIENCY

- Installed occupancy-sensor LED lighting in parking structures across Clusters K, L, X, and Y.
- Replaced outdated AC units in electrical rooms and added light and water sensors across community facilities.
- These measures delivered a 35% reduction in electricity consumption compared to 2023.
- Added new energy and water metres in Uptown Dubai and Jewellery & Gemplex to enhance monitoring and future optimisation.

In partnership with the Dubai Department of Economy and Tourism, DMCC continues to support Dubai Can, the citywide initiative promoting free, safe drinking water and reduced single-use plastics. Since installing two water dispensers in JLT in 2022, the community has helped avoid approximately 1 million single-use plastic bottles.

## LOOKING AHEAD

Next year, DMCC aims to:

- Install additional Dubai Can units in Clusters T and I to further cut single-use plastics.
- Deliver community enhancements, including replacement of the bus station and Mazaya smoke bins.
- Launch a comprehensive waste-management assessment in partnership with external experts, covering DMCC-managed public areas as well as retailers, F&B outlets, and buildings across JLT. The study

will include stakeholder interviews and data collection, with findings informing targeted improvements in waste management practices, infrastructure, and engagement.

These initiatives underscore DMCC's ongoing commitment to sustainability, operational efficiency, and an outstanding experience for everyone who lives, works, and visits within the DMCC Master Community.

	2023	2024
Fuel Used (L)	79,247	60,797
Electricity Purchased (GJ) <sup>3</sup>	31,346.01	20,360.1 <sup>4</sup>
Renewable Energy Generated (GJ)	6,888.17	22,148.22
Waste sent to landfill (tonnes)	157.50	1,176.17
Waste diverted from landfill <sup>5</sup> (tonnes)	9,094.87 <sup>6</sup>	1,574.10
Potable Water Consumed (m <sup>3</sup> )	33.32	33.70
Treated Sewage Effluent (TSE) Water Consumed (MI)	939.72	1,374.79

<sup>3</sup> The following conversion factor was used to convert all Kwh of energy consumption to GJ 1 Kilowatt hours = 0.0036 Gigajoules

<sup>4</sup> Energy consumption outside DMCC's direct operations is reported within Scope 3 greenhouse gas (GHG) emissions, reflecting indirect energy use in upstream and downstream activities.

<sup>5</sup> Refers to waste materials diverted from landfill disposal through energy recovery (incineration), recycling, or composting processes.

<sup>6</sup> The value indicates DMCC-managed spaces in the master community and the towers, as there is no mechanism to separate the waste from public spaces from buildings.



## DMCC OWNED ASSETS

DMCC’s owned portfolio comprises One JLT, the Tea and Coffee Centres, and Uptown Tower – each playing a vital role in supporting commercial growth while reflecting DMCC’s sustainability vision.

- One JLT is a multifunctional office and retail complex within JLT and one of DMCC’s LEED-certified buildings (Gold rating). It incorporates a wide range of sustainable best-practice initiatives to enhance operational efficiency and user comfort.
- Located in Jebel Ali Free Zone, the Tea and Coffee Centres serve as dedicated hubs facilitating roasting, packaging, and trade operations for DMCC’s global commodity members.

- The Uptown Tower, DMCC’s mixed-use landmark, features premium commercial offices, F&B outlets, residential units, and the SO/ Uptown Dubai Hotel.

DMCC also operates a diverse portfolio of business centres that provide flexible office solutions to companies of all sizes – from startups to multinational enterprises. These spaces are strategically located across DMCC’s buildings and partner properties, ensuring accessibility, connectivity, and an outstanding work environment.

### DMCC Owned Assets and Entities<sup>7</sup>

Indicator	2023	2024
Fuel Used (L)	58,496	275,249 <sup>8</sup>
Electricity Purchased (GJ)	45,779.53	69,108.29
Cooling Purchased (RTh)	6,638,911	11,410,813
Renewable Energy Generated (GJ)	5,403.77	5,945.67
Waste sent to landfill (tonnes)	1,254	402
Waste diverted from landfill <sup>9</sup>	913	1,385
Potable Water Consumed (MI)	60.98	176.43 <sup>10</sup>

### WASTE MANAGEMENT STRATEGY

In 2024, DMCC implemented waste segregation programmes across all floors of One JLT, supported by tenant awareness initiatives on source separation. These efforts significantly reduced landfill waste and improved recycling rates. In addition, ongoing discussions with Imdaad, the waste management service provider for the Tea and Coffee Centre, aim to further enhance recycling performance and minimise waste sent to landfill.

### ENERGY EFFICIENCY

DMCC continues to prioritise energy efficiency across its managed assets. Motion sensors were installed in One JLT’s parking areas to enhance lighting efficiency and optimise energy usage. This initiative forms part of DMCC’s continued commitment to reducing energy consumption and advancing

the implementation of sustainable and energy-efficient solutions across its operations.

### STRUCTURAL RESILIENCE AND IMPACT

To mitigate long-term risks associated with water leaks, waterproofing projects were carried out at One JLT and the Tea and Coffee Centres. These works strengthened the structural integrity of both assets and improved resilience against potential water ingress.

Collectively, these initiatives delivered tangible environmental benefits, including:

- A year-on-year reduction in general waste volumes.
- Higher recycling rates across DMCC’s owned assets.
- Energy savings equivalent to approximately AED 80,000 compared with 2023.

<sup>7</sup> The data shows DMCC-owned Assets consumption, which includes (Tea and Coffee Center, One JLT, Uptown Tower, offices located in the JLT, and Concordia)

<sup>8</sup> The value includes Concordia fuel consumption used in their machines and vehicles.

<sup>9</sup> Refers to waste materials diverted from landfill disposal through energy recovery (incineration), recycling, or composting processes.

<sup>10</sup> The value includes Concordia staff accommodation and the water consumption of Concordia’s offices.

# DMCC CLIMATE ACTION AND DECARBONISATION STRATEGY

## COMMITMENT TO CLIMATE ACTION

At DMCC, we are committed to reducing our greenhouse gas (GHG) emissions through proactive, science-aligned measures contributing to the UAE's Net Zero by 2050 Strategy. As an emerging entity in the property development sector, we acknowledge the environmental impact associated with building and construction activities. We are dedicated to embedding sustainability and low-carbon principles across our operations.

In 2024, DMCC strengthened its climate governance framework by ensuring that sustainability leadership is shared across the organisation. Heads of departments and the Deputy CEO and COO, Feryal Ahmadi, successfully completed Carbon Literacy Training. This initiative aimed to deepen the team's understanding

of GHG emissions, emerging trends in decarbonisation, and the critical role each member plays in achieving DMCC's climate objectives.

Building on this foundation, we plan to expand the Carbon Literacy Programme in 2025 to a broader group of employees. This expansion will ensure that all DMCC staff have the knowledge, tools, and responsibility to drive the decarbonisation strategy and support our transition toward a low-carbon future.



## COMPREHENSIVE DISCLOSURES FOR DMCC'S GREENHOUSE GASES (GHG)

In 2024, DMCC took significant steps to enhance the quality and comprehensiveness of its GHG data. Following the identification of data gaps in 2023, we worked closely with multiple departments and data providers to strengthen the accuracy and completeness of our emissions inventory. This year's disclosure also includes Concordia's Scope 1 and Scope 2 emissions, reflecting DMCC's partial ownership and commitment to transparent reporting across entities within our operational boundary.

DMCC developed a GHG Management System in 2024 to institutionalise our data management approach. This framework consolidates emissions data

and outlines identified gaps and presents targeted recommendations to improve data accuracy and completeness. It also defines DMCC's organisational and operational boundaries, identifies key stakeholders, and highlights opportunities to enhance data collection processes across departments. The GHG Management System will be formally communicated to all departments and data providers in 2025 to ensure alignment, ownership, and consistency in future reporting cycles. In parallel, DMCC designed a Communication and Engagement Plan to involve internal stakeholders in reviewing and refining the management system, ensuring it remains relevant and responsive to evolving sustainability standards.

As part of our continuous improvement, DMCC also expanded the scope of its emissions reporting in 2024 by including Scope 3, Category 11 "Use of Sold Products". This addition captures emissions associated with the downstream use phase of products and services sold by DMCC, reflecting our broader accountability for value chain impacts.

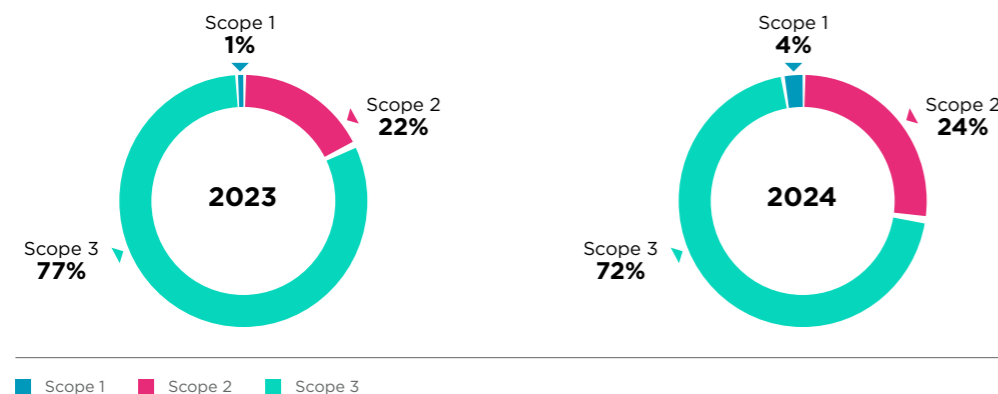
determined to fall within DMCC's operational control boundary, as the entity is partially owned and managed by DMCC. Consequently, total reported emissions for 2024 are expected to increase compared to the previous reporting cycle, reflecting a more complete and transparent accounting of DMCC's operational emissions.

In 2024, DMCC expanded the organisational boundary of its GHG inventory to include emissions from Concordia, following a review conducted in 2023. Based on the findings of the external auditor, Concordia was

Moving forward, DMCC will implement its GHG Management system in 2025, outlining key actions, targets, and timelines to progressively reduce GHG emissions across all scopes in line with our net zero commitment.

## THE BREAKDOWN OF EMISSIONS IS AS FOLLOWS:

	2023	2024
Scope 1	569.57	2,129.97
Scope 2	10,585.23	13,592.83
Scope 3	37,190.28	41,527
Scope 1 (% of total emission)	1%	3.72%
Scope 2 (% of total emission)	22%	23.74%
Scope 3 (% of total emission)	77%	72.53%



## SCOPE 1 EMISSIONS: DIRECT EMISSIONS FROM OPERATIONS

Scope 1 emissions represent direct GHG emissions from sources owned or controlled by DMCC. These emissions arise primarily from fuel use, vehicle operations, and refrigerant leakage.

based on precise fuel consumption records.

Emissions generated from Stationary Combustion activities are mainly generated from the combustion of diesel in the generators across DMCC assets, including the Uptown tower and the JLT. Emissions were calculated using the consumption-based Method, which relies on actual fuel consumption data. Mobile Combustion emissions are all emissions generated from DMCC-owned vehicles, including leased buses and company service vehicles. These emissions were calculated using the Fuel-Based Method

Fugitive emissions stem from refrigerant leaks and fire suppression systems, and are calculated using the screening method, based on assumed leakage rates and equipment capacities.

Concordia Scope 1 emissions from mobile combustion sources were calculated using a fuel-based method, in line with the GHG Protocol: Corporate Accounting and Reporting Standard. Emissions associated with staff transportation were estimated using a distance-based method, derived from data provided by relevant departments.



## SCOPE 2 EMISSIONS: INDIRECT EMISSIONS FROM PURCHASED ENERGY

### ■ PURCHASED ELECTRICITY

Emissions were calculated using the Consumption-Based Method. While reliance on assumptions has been reduced, efforts to enhance data quality and capture actual consumption data are ongoing through the integration of our utility metres into the utility tracking platform Measurabl. In cases where actual data could not be obtained and the Consumption-Based Method could not be fully applied, emissions from purchased electricity were estimated using ratios between total area and known consumption data.

The assets contributing most significantly to electricity consumption are Uptown Tower, JLT District, Jewellery & Gemplex, Tea & Coffee Centres, and One JLT. Their higher impact is primarily attributed to their larger scale and the extent of operational control held by DMCC within these facilities, compared with smaller assets where only limited areas fall under DMCC's management.

All calculations incorporate utility-specific emission factors provided by DEWA.

### ■ PURCHASED COOLING

DMCC relies on a district cooling system provided by Empower across most of its owned assets. Emissions associated with district cooling were calculated using the Consumption-Based Method, based on actual chilled water consumption data. Where actual data were not accessible, estimates were derived using ratios between the total cooled area and known consumption figures.

Concordia Scope 2 emissions were calculated using a consumption-based approach, which provides the most accurate representation of indirect energy use for staff accommodation. For Concordia offices, emissions were estimated using the ratio of total occupied area to total consumption, due to the unavailability of direct energy consumption data. The same proportional methodology was applied to estimate emissions from purchased cooling, ensuring consistency and methodological alignment across reporting categories.

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

Scope 3 emissions encompass indirect GHG emissions that occur across DMCC's value chain, both upstream (from suppliers) and downstream (from product use and leased operations). These emissions represent the largest share of DMCC's total footprint, accounting for approximately 72.5% of total emissions.

### ■ CATEGORY 1: PURCHASED GOODS & SERVICES

This category reflects emissions from goods and services procured to support DMCC's day-to-day operations. Emissions were calculated using the Spend-Based Method, which estimates emissions by multiplying the financial value of goods and services purchased by relevant secondary emission factors. Emissions reported under this category increased significantly during the reporting year, mainly due to an improved classification of construction-related consultancy and engineering services. These activities are now correctly categorised under Purchased Goods & Services as service-based expenditures. In the previous reporting cycle, such activities were grouped under Capital Goods (Category 2) due to limited data granularity. The refined breakdown

enhances reporting accuracy and better reflects DMCC's operational structure.

### ■ CATEGORY 2: CAPITAL GOODS

This category includes emissions associated with the procurement and development of capital assets. Emissions were calculated using the Spend-Based Method, based on the financial value of capital projects and contractor services. The primary contributors to these emissions stem from construction-related activities and services provided by contractors.

In 2024, emissions from capital goods decreased significantly due to the completion of major construction phases and a reduction in capital expenditure. As DMCC's development projects progress, emissions from this category are expected to fluctuate in line with construction intensity. To further enhance accuracy, DMCC aims to refine underlying data and collaborate with contractors who adopt robust GHG accounting practices.

### ■ CATEGORY 3: FUEL- AND ENERGY-RELATED ACTIVITIES

These represent indirect emissions arising from the extraction, production, and transportation of fuels and energy purchased by DMCC.

	2023	2024
Purchased Electricity	8,524.51	10,052.77
Purchased Cooling	2,060.72	3,540.06

■ **CATEGORY 5: WASTE GENERATED IN OPERATIONS**

This category includes emissions generated from waste disposal and treatment processes. Emissions were calculated based on the volumes and types of waste generated. Where actual data were unavailable, the Average-Data Method was applied, estimating emissions based on the total waste sent to each disposal method (e.g., landfill, recycling, composting) and corresponding average emission factors.

■ **CATEGORY 6: BUSINESS TRAVEL**

Emissions in this category arise from employee air travel and other business-related transportation. Calculations were based on actual travel data collected for all employees.

■ **CATEGORY 7: EMPLOYEE COMMUTING**

Emissions were estimated using employee survey data detailing commuting modes, average distances, and frequency of travel. A slight increase was observed compared with the previous year, driven by a higher number of employees and the inclusion of DGCX staff in the commuting assessment. This change reflects broader workforce coverage rather than a shift in commuting behaviour.

■ **CATEGORY 11: USE OF SOLD PRODUCTS**

Newly included in 2024, this category captures downstream emissions from the use phase of sold units, specifically branded residential spaces within Uptown Dubai. These emissions account for estimated operational energy consumption once the units are occupied.

■ **CATEGORY 13: DOWNSTREAM LEASED ASSETS**

This category covers emissions associated with energy use in leased spaces operated by third parties. Emissions decreased following the reclassification of the Uptown Hotel. As the hotel is owned by DMCC but operated by Accor, its related emissions are now reported under Category 1: Purchased Goods and Services within the Hotel Management Services. This adjustment improves alignment of reporting boundaries with operational control and management responsibilities.

	2023	2024
Category 1	1,605.28	23,438.07
Category 2	28,812.68	9,375.97
Category 3	379.20	406.22
Category 5	741.07	840.94
Category 6	699.29	725.02
Category 7	1,605.62	2,037.76
Category 11	0	2,372.50
Category 13	1,838.41	597.80



# CLIMATE RISKS AND OPPORTUNITIES MANAGEMENT

## OVERVIEW

At DMCC we have been publishing our Sustainability Report annually since 2017, demonstrating our commitment to transparency in sustainability-related matters and reporting.

In October 2023, the International Sustainability Standards Board (ISSB) assumed responsibility from the Task Force on Climate-related Financial Disclosures (TCFD) for the monitoring of companies' sustainability and climate-related disclosures. Following this, the ISSB released the IFRS Sustainability Disclosure Standards (S1 and S2), with S2 designed to fully incorporate the TCFD recommendations.

We are now keen to further our commitment to impactful sustainability reporting and strengthen our performance by aligning with IFRS S2 requirements and integrating climate-related risks and opportunities as part of our sustainability reporting. To do so, we conducted a gap analysis to assess current disclosures and practices against IFRS S2 requirements. Following the gap analysis, a detailed roadmap was created to facilitate our journey to adopting the IFRS S2 standard. In addition, we assessed the climate-related risks and opportunities relevant for our operations, which are outlined in the following sections.

## ROADMAP TO IFRS S1 & S2 ALIGNMENT

We conducted an in-depth analysis to assess the maturity of our current reporting and practices against the disclosure requirements of the IFRS S2.

- **Governance** - At present, we have established the foundations for Board and Management oversight of Sustainability at DMCC, and integration of climate into this governance is part of our future plans.
- **Strategy** - IFRS S2's Strategy pillar is founded on the assessment of climate risks and opportunities for a company's operations and value chain, and the integration of these into strategic planning. As a first step towards addressing this, we undertook our first Climate Risk Assessment (CRA) covering our direct operations in 2025.
- **Risk Management** - Our Enterprise Risk Management (ERM) Framework

identifies "Natural Environment" as an external factor for risk sources, providing the foundation for integrating climate risks into our ERM process in the future.

- **Metrics and Targets** - We have committed to environmental targets that are critical to our climate transition journey. These include a number of quantitative and qualitative targets, as well as plans to improve sustainability performance, guided by our Sustainability Strategy and Decarbonisation Roadmap. To strengthen our compliance with IFRS S2, we plan to adopt quantitative targets along with metrics for monitoring them across different parameters that support our broader climate transition.



## GOVERNANCE

### BOARD AND MANAGEMENT OVERSIGHT

The broader principles and structures of governance at DMCC are outlined in the Governance section of this report, which details the company's overall approach to accountability, oversight, and ethical business conduct. Building on this foundation, we have taken steps to integrate climate-related governance in line with the requirements of IFRS S2.

We have established initial processes that form the basis of Board and Management oversight of sustainability. These foundational elements are being progressively strengthened to ensure alignment with IFRS S2 disclosures. While high-level aspects of oversight have been initiated, we will continue to enhance our governance structures, policies and processes around climate-related risks and opportunities.

Currently, the Board provides oversight through its annual review of the Sustainability Report following publication. In 2025, ESG performance will be formally included as an agenda item for the Board, marking an important step toward embedding sustainability within strategic discussions. There are also plans to formalise the Board's involvement in climate oversight and to conduct

dedicated training sessions to build Board and Management capacity on sustainability and climate-related matters.

To strengthen alignment with IFRS S2, we have identified the following priority areas:

- Mandates and responsibilities
  - Defining the roles of the Board, Management, and sustainability working groups in overseeing climate-related risks and opportunities.
- Integration into incentives - Embedding climate-related metrics into performance evaluation and incentive structures for Management.
- Reporting frequency - Establishing clear timelines for how often climate-related information will be reported to and reviewed by the Board and Management.
- Through these measures, we aim to enhance our governance framework to provide robust and transparent oversight of climate-related risks and opportunities, supporting both resilience and long-term value creation.

## STRATEGY

Through a scenario analysis-driven climate risk assessment, we have identified and assessed the material climate-related risks and opportunities that may impact our operations over the short, medium and long-term time horizons. Our analysis involved assessment of nine physical risks, relevant transition risks across the four categories of policy, market, technology and reputation, and various climate opportunities.



## CLIMATE RISK ASSESSMENT METHODOLOGY

### SCENARIOS AND TIME HORIZONS

Our scenario analysis considered the following time horizons:

- Short-term: current to 2030, in alignment with DMCC's Business Strategy
- Medium-term: 2030 to 2040, aligned to our decarbonisation roadmap
- Long-term: 2040 to 2050, also aligned to our decarbonisation roadmap
- Future outlook: 2050 to 2080 an additional longer term outlook was also assessed to benchmark the impacts of physical risks against a historical baseline

We utilised the following scenarios based on global climate scenario datasets for assessing physical and transition risks under a range of possible futures. For physical risks, we utilised a physical risk tool designed with data input from the Intergovernmental Panel on Climate Change (IPCC), World Resources Institute (WRI), the World Bank, and others, to evaluate climate exposure across 18 of our sites in Dubai. For transition risks, we combined the Network for Greening the Financial System (NGFS) scenario variables with our decarbonisation roadmap and operational forecasts to estimate risks and potential financial impacts.

**PHYSICAL RISK ASSESSMENT**

Our methodology for assessing physical risks defines risk as a function of exposure and asset vulnerability, and as part of our inaugural climate risk assessment, we have evaluated the exposure of our sites to physical climate hazards. We screened for nine physical climate hazards: extreme heat, extreme cold, water stress, wildfire weather, pluvial /extreme rainfall flooding, drought, cyclones, riverine flooding, and coastal flooding. In upcoming years, we plan to determine the vulnerability of each of our assets to quantify the risk.



SCENARIOS	TEMPERATURE ALIGNMENT	SCENARIO NARRATIVE AND ASSUMPTIONS
<ul style="list-style-type: none"> <li>■ <b>SSP1 / RCP 2.6</b></li> <li>■ <b>NET ZERO 2050</b></li> </ul>	-1.5°C above pre-industrial levels by 2100	This scenario describes a world that gradually but pervasively shifts toward a sustainable development path, characterised by low challenges to both mitigation and adaptation. Strong international cooperation, significant investment in green technologies, and rapid reductions in greenhouse gas emissions support an orderly transition, where stringent climate policies and technological innovations are implemented without delay. The global economy rapidly scales renewable energy and adopts low-carbon technologies, enabling the achievement of Net Zero emissions by 2050.
<ul style="list-style-type: none"> <li>■ <b>SSP2 / RCP 4.5</b></li> <li>■ <b>DELAYED TRANSITION</b></li> </ul>	-2.0–2.4°C above pre-industrial levels by 2100	This scenario reflects a “middle of the road” pathway where global trends largely follow historical patterns, resulting in moderate challenges to both mitigation and adaptation. Progress toward sustainability is uneven, with some countries advancing while others fall short, leading to only moderate reductions in emissions. Climate policies are delayed until 2030, creating a disorderly transition that requires steeper and more disruptive action thereafter. The late response drives higher transition costs, market volatility, and economic uncertainty, even though long-term temperature rise is ultimately limited.
<ul style="list-style-type: none"> <li>■ <b>SSP3 / RCP 8.5</b></li> <li>■ <b>CURRENT POLICIES</b></li> </ul>	-3.5–4.5°C above pre-industrial levels by 2100	This scenario depicts a world driven by fossil-fuel-intensive economic growth, where rapid technological advancement and competitive markets fuel innovation but do little to reduce dependence on carbon-intensive energy. With no additional climate policies introduced beyond those already in place, fossil fuel use remains high and emissions continue to rise or plateau only marginally. The result is high challenges to mitigation, while adaptation relies heavily on technology and economic capacity. As physical climate risks intensify, adaptation needs increase sharply, creating a “hot house world” trajectory of significant global warming.

Table showing Climate scenarios utilised for scenario analysis

**TRANSITION RISK ASSESSMENT**

We utilised the NGFS scenario-based indicators to assess the four categories of transition risks: Policy & Legal, Market, Technology, and Reputation.

The following tables outline our material climate-related risks and opportunities.

Climate-related Risks	Description	Potential impacts to our business	Key actions in our strategies that mitigate the risk
<p><b>Water Stress</b></p> <p>Type: Physical Risk Time horizon: Short, medium and long terms</p>	<p><b>Description:</b> When the demand for water is higher than the amount available, or when poor water quality limits its use. It often occurs in areas where natural water resources are scarce or heavily used.</p>	<ul style="list-style-type: none"> <li>Increased operational cost of purchasing water.</li> <li>Potential disruptions to our HVAC systems due to limited water supply.</li> <li>The risk is projected to have a high impact to all our assets across all warming scenarios.</li> </ul>	<ul style="list-style-type: none"> <li>Our operations do not primarily include water-intensive activities, and therefore purchase of water does not contribute significantly to our operational expenses.</li> <li>We perform periodic upgrades of our HVAC systems to ensure water-efficient operations to avoid disruptions.</li> </ul>
<p><b>Coastal Flooding</b></p> <p>Type: Physical Risk Time horizon: Short, medium and long terms</p>	<p><b>Description:</b> The temporary or permanent covering of land by seawater, caused by storm surges, high tides, or rising sea levels. It can damage buildings, roads, and infrastructure in low-lying coastal areas.</p>	<ul style="list-style-type: none"> <li>Property damage costs requiring repairing or replacing infrastructure.</li> <li>Loss of revenue due to flood-related work downtime.</li> <li>The risk is projected to have a high impact to the majority of our assets across all warming scenarios.</li> </ul>	<ul style="list-style-type: none"> <li>We plan to explore insurance options against physical climate hazards to ensure adequate protection.</li> <li>As part of strengthening our agility, we have adopted practices that would enable our critical functions to continue operations remotely to ensure minimal downtime.</li> </ul>
<p><b>Wildfire Weather</b></p> <p>Type: Physical Risk Time horizon: Short, medium and long terms</p>	<p><b>Description:</b> Weather conditions that increase the likelihood of wildfires or building fires starting and spreading, such as hot temperatures, low humidity, and strong winds.</p>	<ul style="list-style-type: none"> <li>Property damage costs requiring repairing or replacing infrastructure.</li> <li>Fines or compliance costs if fire safety codes were not adhered to.</li> <li>The risk is projected to have a high impact to all our assets across all warming scenarios.</li> </ul>	<ul style="list-style-type: none"> <li>We ensure that all our buildings comply with the Dubai Building Code and meet the necessary fire rating requirements.</li> </ul>
<p><b>Extreme Heat</b></p> <p>Type: Physical Risk Time horizon: Medium - Long term</p>	<p><b>Description:</b> Periods of unusually high temperatures (&gt; 40C) that last for days or weeks, which can harm people's health and put a strain on energy and water systems.</p>	<ul style="list-style-type: none"> <li>Increasing operating costs from increased cooling requirements and maintenance.</li> <li>Outdoor staff may be susceptible to heat stress-related ailments during hot months.</li> <li>The risk is project to have a medium to high impact to all our assets across all warming scenarios.</li> </ul>	<ul style="list-style-type: none"> <li>We plan to explore energy-efficiency retrofits for our HVAC systems in the medium to long term, when the impact of extreme heat risk is likely to be high.</li> <li>In alignment with the UAE Ministry of Human Resources and Emiratisation's (MoHRE) directive, we ensure midday breaks are provided for our outdoor workers during the stipulated months.</li> </ul>
<p><b>Carbon pricing - Direct carbon costs</b></p> <p>Type: Policy transition risk Time horizon: Medium to long term</p>	<p><b>Description:</b> The potential carbon tax that we could be subject to upon a potential implementation of carbon pricing mechanisms in the UAE.</p>	<ul style="list-style-type: none"> <li>At present, the UAE does not have a carbon pricing mechanism or emission trading system. However, the Net Zero Strategy 2050 and the UAE Climate Law (Federal Decree-Law No. (11) of 2024) empower incentives for emissions reduction, potentially becoming bases for future carbon pricing implementation.</li> <li>We are not likely to be impacted in a business as usual scenario. However, under lower warming scenarios, we may face a direct carbon price ranging from -USD 160,000 to USD 2.2 million on our Scope 1 emissions.</li> </ul>	<ul style="list-style-type: none"> <li>Our decarbonisation roadmap lays out a pathway for us to reduce our emissions with the aim to reach net zero emissions by 2050, in line with the UAE's Net Zero 2050 Strategy. We have identified key decarbonisation actions that we would need to implement to achieve reductions of our direct emissions.</li> </ul>

Table showing Climate-related risks and our actions towards their mitigation

<p><b>Alignment gap with national emissions roadmap</b></p> <p>Type: Reputation transition risk Time horizon: Long term</p>	<p><b>Description:</b> A comparison of our emissions reduction roadmap with the UAE's to assess if we are ahead of the curve, in line or lagging behind.</p>	<ul style="list-style-type: none"> <li>The alignment of our net zero pathway to the UAE's national emissions reduction pathways indicate that our pathways are leading on two scenarios: Current Policies and Delayed Transition.</li> </ul>	<ul style="list-style-type: none"> <li>Our decarbonisation roadmap has been developed with three scenarios and ensures alignment with the UAE's emissions reduction roadmap.</li> </ul>
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While climate change presents a range of risks to our business, it also creates significant opportunities for innovation, efficiency, and growth. By proactively addressing climate-related challenges, we can strengthen our resilience, unlock new market opportunities, reduce costs through improved resource efficiency, and align with national and global decarbonisation goals. Identifying and acting on these opportunities enables us to create long-term value for our stakeholders while contributing to a more sustainable future. We have identified two key climate-related opportunities that strengthen our decarbonisation journey, detailed in the table below.

Climate-related Opportunities	Description	Potential impacts to our business	Key actions in our strategies that realise the opportunity
<p><b>Investment in renewable energy generation at our sites and solar power purchase</b></p> <p>Type: Technology transition opportunity Time horizon: Medium to long term</p>	<p><b>Description:</b> The opportunity of setting up solar power generation infrastructure and establishing agreements with producers to increase renewable energy in our energy mix.</p>	<ul style="list-style-type: none"> <li>We are likely to face a potential financial impact in capital expenditure towards installation of solar power generation infrastructure ranging from USD 1.8 million to USD 3.3 million.</li> <li>In the long term, our investment in solar power generation and purchase would reduce our operating costs associated with electricity purchase and contribute towards reducing our Scope 2 emissions.</li> </ul>	<ul style="list-style-type: none"> <li>We have accounted for future solar power generation as a critical part of our decarbonisation roadmap.</li> <li>We have a profit-sharing agreement with Etihad ESCO on solar panel installations in the JLT district.</li> <li>We are exploring Power Purchase Agreements (PPA) for solar power procurement, and on expansion of current agreements.</li> </ul>
<p><b>Reduced electricity market price exposure through increasing solar power consumption</b></p> <p>Type: Market transition opportunity Time horizon: Medium term</p>	<p><b>Description:</b> Transition policies and global extreme events may increase volatility, affecting the cost of electricity.</p>	<ul style="list-style-type: none"> <li>Across all scenarios analysed, electricity price is projected to rise before stabilising and eventually seeing a mild decline towards 2050.</li> <li>Electricity prices are projected to be subject to volatility and we could face a potential financial impact ranging from USD 2.3 million to 3.7 million upon our continued dependence on grid electricity through thermal sources.</li> </ul>	<ul style="list-style-type: none"> <li>As part of our decarbonisation plan, we have developed a roadmap for solar power consumption. At present, we have generation capabilities across our assets that are being utilised to their full potential. This is part of our plan to reduce dependence on thermal electricity sourced from the grid.</li> </ul>

Table showing Climate-related opportunities and our actions towards their realisation

## RISK MANAGEMENT

Our approach to climate-related risk management is designed to identify, assess, and monitor both physical and transition risks that may affect our operations, assets, and long-term resilience. We have aligned this process with the IFRS S2 requirements, drawing on globally recognised climate scenarios, specialised analytical tools, and our own decarbonisation roadmap.

### ENTERPRISE RISK MANAGEMENT FRAMEWORK

We manage risks through our Enterprise Risk Management (ERM) framework based on the COSO approach, which is designed to identify and address risks to our strategic goals. This framework recognises "Natural Environment" as a source of risk, and we plan to incorporate climate-related risks into this category. In 2025, we conducted our first formal Climate Risk Assessment (CRA) for our assets and business entities in Dubai, marking an important step towards aligning with IFRS S2 disclosure requirements.

### RISK IDENTIFICATION AND ASSESSMENT PROCESS

Our process for identifying and assessing climate-related risks and opportunities is anchored in scenario analysis, which

allows us to test our resilience against a range of plausible futures. This approach was applied to both physical and transition risks.

#### Physical Risks

The process to identify and assess physical risks involved:

- Hazard Identification – We used a third-party climate physical risk analysis tool to screen 18 of our sites against nine climate hazards.
- Scenario Analysis – We assessed our exposure across three Shared Socioeconomic Pathways (SSPs).
- Time Horizons – Risks were evaluated across multiple timeframes with defined short, medium and long-term horizons.
- Risk Assessment – The analysis focused on exposure of our assets to the identified hazards. This provides a quantitative baseline for prioritising critical risks and guiding future mitigation strategies. The most significant physical risks for our operations were identified as water stress, coastal flooding, wildfire weather, and extreme heat.

#### Transition Risks

The process for assessing transition risks was tailored to our business model and decarbonisation roadmap:

- Risk Identification – Transition risks were identified across four categories consistent with IFRS S2: Policy & Legal, Technology, Market, and Reputation.
- Scenario Analysis – We applied three NGFS scenarios.
- Time Horizons – Risks were evaluated across multiple timeframes with defined short, medium and long-term horizons.
- Risk Assessment – The methodology combined NGFS scenario variables with our decarbonization roadmap and operational forecasts. This enabled us to estimate financial impacts. The results highlighted Market and Technology risks as the most material transition risks for DMCC.

### INTEGRATION WITH ENTERPRISE RISK MANAGEMENT

We plan to integrate the results of these assessments into our broader enterprise risk management (ERM) framework. This will ensure that climate-related risks are considered alongside other strategic, operational, and financial risks. Findings would be reviewed by our senior management and reported

to the Board as part of our annual sustainability reporting cycle, with plans to increase the frequency of climate-related reporting. Going forward, we aim to embed these processes more deeply into decision-making, including capital planning, investment strategies, and operational resilience measures, to strengthen our long-term preparedness and align with IFRS S2 expectations.

### METRICS AND TARGETS

We have been proactive in measuring and managing our greenhouse gas (GHG) emissions, undertaking a full GHG accounting exercise since 2023. Although this effort has been voluntary to date, it positions us strongly to meet the disclosure requirements of IFRS S2. By building our emissions inventory early, we are able to establish credible baselines, track progress against decarbonisation goals, and strengthen our ability to manage transition risks.

Detailed information on our GHG emissions, including Scope 1, Scope 2, and relevant Scope 3 categories, is provided in Sustainable City section of this report. This section outlines our emissions profile, methodology, and year-on-year performance, forming the basis for our climate-related metrics and targets.

## THE BEGINNING OF OUR CLIMATE DISCLOSURES JOURNEY

Through our climate risk assessment, we have identified the potential risks and opportunities associated with climate change across our operations. Additionally, our IFRS S2 gap analysis has provided us with insight into our current alignment with the disclosure requirements alongside areas for additional alignment, allowing us to further develop our approach to climate-related disclosures as we progress. Building on this foundation, our next steps will include undertaking an IFRS S1 gap analysis and preparing our first IFRS-

aligned disclosures as per our roadmap. Through ongoing monitoring and reassessment of climate-related risks, we will look to ensure that our strategic planning and risk management practices remain responsive to a changing climate and economy. In doing so, we are committed not only to strengthening our resilience but also to positioning our business to capture long-term opportunities as the transition to a low-carbon economy accelerates.

# OCCUPATIONAL HEALTH AND SAFETY

At DMCC, the health and safety of our stakeholders remain our top priority. We are committed to maintaining the well-being of our staff, workers, visitors, residents, and all other stakeholders by implementing comprehensive HSE policies and procedures that align with local and international standards.

With DMCC emerging in the property development sector and ongoing community enhancement projects, a robust HSE guideline is crucial to minimising the impact of our activities. We have identified significant potential positive and negative effects through our stakeholder engagement efforts. As the custodians of the HSE regulations within our community, we continue to monitor and enhance the existing infrastructure to address potential challenges arising from land development and ongoing business activities.

DMCC has implemented a comprehensive Health and safety management framework. The framework is governed by the DMCC HSE Guidelines and is

applied across all operations and projects. We ensure that all facility management service providers are ISO 45001:2018 certified, and all construction and fit-out works operate under dedicated HSE plans reviewed and approved prior to execution. The framework is further supported by the DMCC Asset Management Procedure, which is aligned with ISO 55000, with compliance demonstrated through service provider certifications and documented project plan reviews.

The system has been implemented due to legal requirements identified through DMCC's statutory compliance register, which is aligned with UAE Federal Laws, Dubai Municipality Technical Guidelines, and Dubai Civil Defence codes.

Internationally, this system adheres to internationally and locally recognized standards. International standards include ISO 45001 for occupational health and safety management, ISO 9001, ISO 14001 for environmental management, and ISO 9001 for quality management. Compliance with the requirements



is monitored via a statutory tracker maintained by service providers and reviewed by DMCC. The register is updated regularly to reflect changes in legislation. All facility management service providers are certified by ISO 45001:2018, ensuring implementation at the operational level.

All DMCC operations, projects, fit-outs, and master community activities are regulated and monitored through permits issued by the facility management service provider under DMCC's oversight. Our HSE team regularly conducts hazard identification, risk assessment, and incident investigation in line with DMCC HSE Guidelines. Prior to work, routine and task-specific risk assessments are conducted, supported by method statements, toolbox talks, and inspections. Incident investigations use structured root-cause analysis with corrective actions tracked. Additionally, all companies within DMCC undergo Operational Fitness Certificate (OFC) checks before trade licence renewal, ensuring compliance at the community level. Additionally, we identify work-related hazards through site inspections, permit reviews, incident and observation reports from Unifier. OFC audits provide an additional compliance layer for all licenced companies. Service provider ISO 45001 systems and DMCC oversight

ensure alignment with statutory and international standards. Reviews are conducted routinely and post-incident for continual improvement.

Results from inspections, reports, and incident investigations are reviewed during weekly and monthly HSE meetings, ensuring findings are integrated into continual system improvements.

At DMCC, we have established a digital HSE reporting system through "Unifier". The system enables staff, contractors, and service providers to report hazards, unsafe working conditions, and incidents. On-site reports can also be raised through observations, inspections, and Incident/Investigation Reports. Workers are protected against reprisals through the DMCC HSE Guidelines, which grant the authority to stop unsafe work and ensure non-retaliation for hazard reporting. Awareness is reinforced via inductions and toolbox talks.

We have established a comprehensive process and set of guidelines that allow workers to remove themselves from any work situation they believe could cause injury. DMCC and its service providers maintain a clear Stop Work Policy, empowering all workers to immediately cease work they believe could cause injury or ill health. This right



is communicated through inductions, toolbox talks, and training sessions. The DMCC HSE Guidelines and Asset Management Procedures reinforce the principle of non-retaliation, ensuring that no worker is penalised for exercising stop work authority. Additional measures, such as the enforcement of summer working hours and long-working-hour restrictions, are implemented in accordance with local authority directives.

In line with DMCC HSE Guidelines, all non-employee workers must undergo inductions, health risk assessments, and mandatory training across all projects and operations. Accredited to ISO 45001, facility management service providers provide access to competent HSE staff, occupational health advice, and workplace monitoring (e.g., PEEPs,

risk profiling, environmental controls). Contractors engaged within DMCC undergo vetting and prequalification to confirm health and safety competence. Occupational health requirements are embedded in the DMCC HSE Guidelines and Asset Management Procedures.

DMCC facility management service providers established a committee under their ISO 45001 management systems, where worker representatives and management review safety performance and actions. At construction projects, worker participation and consultation are ensured through weekly site walks and engagement led by the consultant, main contractor, and senior leadership teams. These mechanisms provide structured participation, and no worker groups are excluded.

DMCC facilitates voluntary health and wellbeing programmes for employees and service provider staff, including awareness through DMCC Happiness Campaigns and wellbeing sessions. Service providers also deliver regular health surveillance, medical screening, and fitness-to-work checks as part of their occupational health programmes. Workers are encouraged to participate through communication campaigns and internal LMS announcements.

**INTERNAL TRAINING PROGRAMMES**

- 53 Toolbox Talks Safety Awareness programmes delivered to all staff across MC operations
- TBTs of Safety Awareness Programmes attended by 26,360 Master Community FM Staff, including security & service providers.

**INTERNAL SAFETY AWARENESS SESSION**

- Attended by 2737 employees, including regular service providers

**EXTERNAL TRAINING PROGRAMMES:**

- IPAF Training
- Scaffolding Erection & dismantling Training
- Scaffolding Inspector Training
- Rigging and Slings Training
- Manual Handling
- Safe Use of Ladder
- Slip, Trip, and Fall Prevention
- First Aid Awareness Training
- Basic Fire and Safety Training
- Crisis Management Plan & Fire Emergency Response
- Chemical Safety & Emergency spill control measures
- Hazard Identification and Reporting

**2024 KEY HIGHLIGHTS AND ACHIEVEMENTS:**

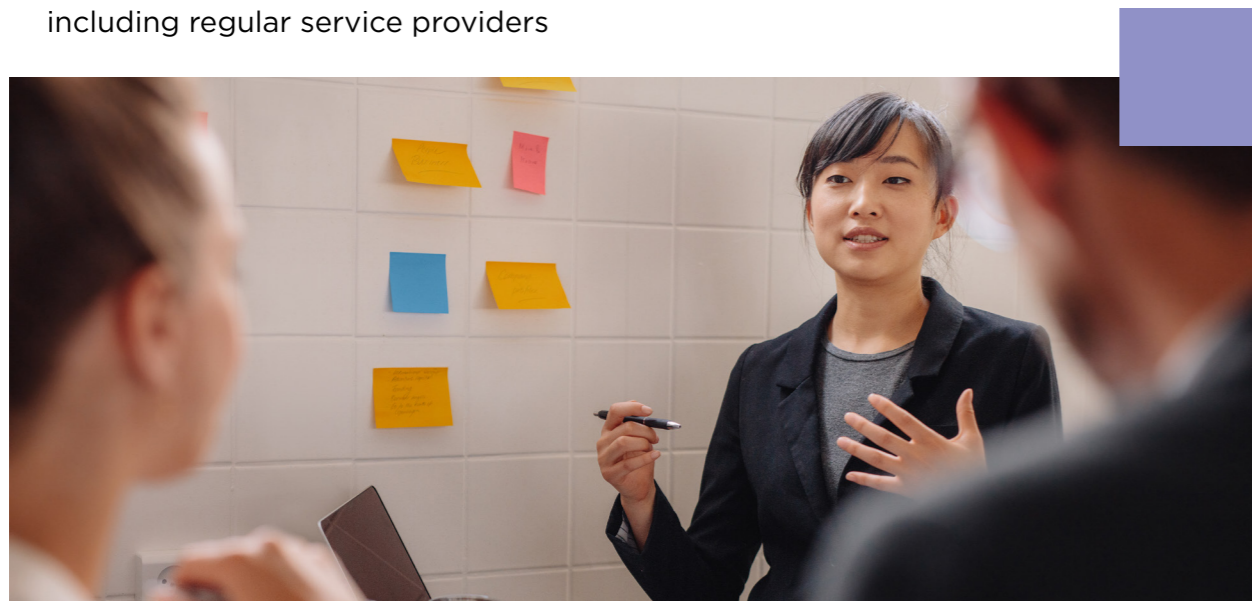
- DMCC maintained ZERO LTI across all business units in 2024

DMCC Master Community and Owned Assets <sup>11</sup>			
HSE Indicator	2022	2023	2024
<b>Total Hours Worked - Employees</b>	26,265.62	34,763.48	14,155.24
Non-employees	11,714,664	10,229,062	5,858,775
<b>Total Percentage of Employees &amp; Non-Employees covered by the Safety Management System</b>	100%	100%	100%
<b>[PA2] Total Number of Lost Day Rate</b>	0	0	0
<b>Total Number of Lost Time Injuries</b>	0	0	0
<b>Total Number of Occupational Illnesses/Diseases</b>	10 <sup>12</sup>	1 <sup>13</sup>	0
<b>Total Number of Fatalities (Recordable/Work-related)</b>	0	0	0
<b>Non-compliance with Environmental Laws and Regulations</b>	0	0	0

<sup>11</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.

<sup>12</sup> 5 First aid cases in Uptown District, and 5 First Aid Case and Medical Treatment Cases (MTC) (Minor)

<sup>13</sup> Heat stress related cases due to ambient temperature





During our induction programme, 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.

DMCC remains committed to maintaining high standards of health, safety, and environmental management across all its assets and property developments. DMCC ensures effective safety management across its master community in JLT, owned assets such as Uptown Tower, One JLT, and the Coffee & Tea Centre, as well as corporate offices and facilities. This commitment extends to construction and fit-out activities across the district, ensuring all works comply with the applicable Authorities under Jurisdiction and DMCC's internal

standards. In partnership with ISO-certified facilities management providers and in alignment with ISO 9001, ISO 14001, and ISO 45001 principles, DMCC continues to strengthen its HSE governance, enhance fire and life safety management, and foster a proactive safety culture through audits, awareness programmes, and Operational Fitness Certificate (OFC) compliance checks.

## SECURITY PRACTICES

In 2024, 100% of DMCC Group Security employees and 100% of contracted Concordia security personnel received training in security practices and procedures, that are aligned with expectations and standards on human-rights. DMCC staff completed an average of 10 training hours during the year, excluding separate HR/Audit compliance modules (e.g., Code of Conduct and Anti-Corruption).

Furthermore, training requirements also apply to third-party security providers deployed at DMCC-owned assets. Concordia personnel undergo SIRA-mandated role-based training alongside day-one HR/HSEQ/Security induction, monthly Toolbox Talks (TBT), and periodic refreshers, with updates delivered via email and online/class sessions as needed. A dedicated training professional was assigned to Concordia to oversee the training materials and to conduct trainings to all applicable staff, as necessary.

The curriculum emphasizes human-rights considerations in day-to-day security interactions, including topics such as Community Guidelines, Customer Care, Security Code of Conduct, and Behavioural Safety. Training reinforces respectful engagement, non-discrimination, de-escalation, and proportional response, to ensure visitors, tenants, professionals and residents of the community are not treated unfairly.

# COMMUNITY ENGAGEMENT

As the Master Developer and a government entity in Dubai, we are committed to fostering the well-being and sustainable lifestyle of our residents and visitors. Our ongoing efforts to enhance existing infrastructure reflect our commitment to fostering community while placing a strong emphasis on environmental stewardship.

Community engagement is core to our operations, as it is one of the

main objectives why DMCC exists in the first place. On an ongoing basis we conduct environmental and social impact assessments, develop and execute local community development programmes aimed at enhancing skills of entrepreneurs. DMCC engages with a wide range of stakeholders when planning community infrastructure enhancements, which are reflected in the previous section of our report.

In the result of our stakeholder engagement exercise, DMCC identified a wide range of impacts on our community, which are mostly positive due to the focus on the community development, but include potential negative impacts that we are aware of. These include:

- Current lack of education and full-scale capabilities for waste recycling
- Large water consumption to support the existing green ecosystem (which in turn has positive impact on residents' well-being)
- Environmental impact from treatment of the water in the lakes

In order to address these, DMCC aims to develop a community-wide Waste Management strategy aligned with new Dubai Municipality regulations, launch new lakes-redevelopment initiatives and install a smart irrigation system.

Beyond the community where we operate, DMCC continues to support Evolvin' Women, a Dubai-based social enterprise. The organisation empowers women from undeserved communities, particularly in Africa, by providing professional development opportunities in the UAE. The company was the first DMCC Corporate Social Responsibility licence recipient, highlighting its commitment to sustainable development and gender equality. The numbers speak for themselves: 1,300 women empowered, over 150,000 hours of training, coaching and mentorship, and \$9 million in generated salaries since 2019.

In March 2024, DMCC launched the Sustainability Hub. This initiative aims to bring together like-minded people seeking to advance their ESG performance and share knowledge

within the community. The hub offers its members a wide range of benefits, including access to knowledge sharing sessions, networking events, and services offered by the hub partner. DMCC is committed to giving back to the community through offering them meaningful and practical solutions to advance in the sustainability journey through collaboration and partnerships with experts.

DMCC also has a Social Impact Fund governed by our SDG Steering Committee and aims to support organisations and projects that benefit our local community and the achievement of the targets related to sustainable development goals.

In 2024, we dedicated the following funds to various organisations and projects:

DMCC Social Impact Scale-Up Programme Participants Financial Support	60,000
Companies Creating Change (C3)	735,000
European Women's Association	435,000
NGO Resolve	315,000
DMCC AI Hackathon	183,635
Evolvin' Women	110,000
Sustainability Hub Loyalty Points	150,000
Friends of Cancer Patients	50,000
Community Fountains - Dubai Can	300,000
<b>Total (AED)</b>	<b>2,338,635</b>



# OPERATIONAL EXCELLENCE

## GOVERNANCE AND LEADERSHIP

Our operations and sustainability objectives are guided by several esteemed governing bodies that play a vital role in overseeing our progress and ensuring adherence to protocols and standards. These organisations 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, and the World Federation of Diamond Bourses. Through our involvement, we stay up to date with industry best practices and collaborate with fellow industry leaders to continuously enhance our operations.

DMCC established a Board of Directors (the “**Board**”) in 2021 through the issuance of Decree No. (40) of 2021 on

the formation of the Board of DMCC, and subsequently reformed the Board under Decree No. (55) of 2024 (together, the “**Board Decrees**”). This is in alignment with Law No. (3) of 2020 (the “**DMCC Law**”) issued by His Highness Sheikh Mohammed bin Rashid Al Maktoum, Ruler of Dubai, Vice President, and Prime Minister of the UAE. 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 interests of our stakeholders and the broader community.

## DMCC BOARD OF DIRECTORS

Name	Board Members' Commitments
<b>Hamad Mubarak Buamim</b>	Chairman of DMCC's Board of Directors, National General Insurance PJSC and Wealthbrix Capital Partners Limited. Vice Chairman of Deyaar Properties PJSC. Board Member at Dubai Electricity & Water Authority PJSC, Dubai Islamic Bank PJSC, International Hotel Investment PLC - Malta, Economic Zones World (JAFZA) and Awqaf Dubai.
<b>Abdul Wahed Abdul Rahim Al Olama ("Abdulwahid Alulama")</b>	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.
<b>Ahmed Bin Sulayem</b>	None
<b>Abdullah Saif Al Shamsi</b>	Head of Infrastructure in Investment Corporation of Dubai. In addition, serves on the boards of multiple ICD portfolio companies.
<b>Charles George Webb</b>	Leads two consulting businesses, providing research and strategic advice to global clients.
<b>Thierry Jean Louis Gimonet</b>	Finance Director of Investment Corporation of Dubai.
<b>May Nasrallah</b>	May Nasrallah is the Chairwoman of PJT Partners (MENA) and Partner at PJT Partners.

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 resolutions for 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.

DMCC's Board of Directors has been reformed in September 2024, with Roger Bernstein replaced by May Nasrallah. Prior to fully integrating deNovo Partners into PJT Partners on October 1st 2024, Ms. Nasrallah was the Founder and Executive Chairwoman of deNovo Partners, a financial advisory firm she established in 2010, with offices in Dubai and Riyadh.

Before founding deNovo, Ms. Nasrallah spent over 15 years at Morgan Stanley in New York, Hong Kong, London and finally Dubai, where she set-up and led the firm's investment banking efforts in the MENA region. Ms. Nasrallah previously served as Non-Executive Chairman to BlackRock in the Middle East from 2020 to 2022. Ms. Nasrallah also serves as Independent Board Member of The Dubai International Chamber, YBA Kanoo Holding and other non-profit organizations such as ABANA, LIFE and MEI.

Currently, 33% of the Board is comprised of members within the age range of 30-50, while those above age 50 represent the remaining 67% of the Board. All members of the Board are non-executive, except for Ahmed Bin Sulayem, the CEO and Executive 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 and external audit results 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 sub-committees: the Audit Committee (AC) and the Remuneration Committee (REMCO). 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 AC 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 AC include Thierry Gimonnet (Chairman), Abdulwahid Alulama, Abdulla Al Shamsi. Justin Manala, DMCC Senior Director of Internal Audit & Risk Management, serves as the Audit Committee Secretary. Any violations, misconduct, and issues are reported to the Internal Audit & Risk Management Department in accordance with the Corporate Whistleblowing Policy. Critical issues raised through grievance mechanisms and identified by the Internal Audit & Risk Management

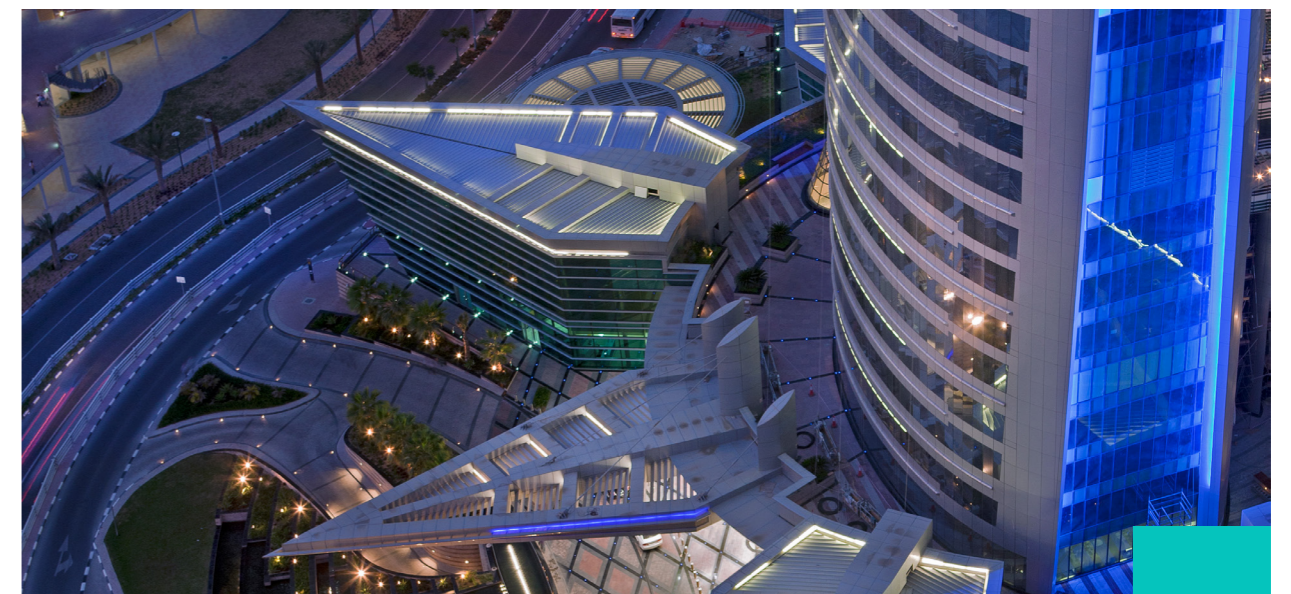
Department are shared with the AC for review and actions. The Internal Audit & Risk Management Department at DMCC operates independently. Its role is to uphold ethical standards of social and environmental issues while enhancing policies and procedures through risk-based objectives.

The REMCO 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 REMCO include Abdulwahid Alulama (Chairman), Abdulla Al Shamsi, Thierry Gimonnet. Ahmad Al Shareef, DMCC Executive Director of Human Resources, serves as the REMCO Secretary. DMCC's Human Resources Department collaborates with an independent third-party remuneration consultant to propose changes and ensure the effectiveness of the organisation's structure.

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. 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.

The policy commitments are integrated into 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, while residents of the Jumeirah Lakes Towers (JLT) district represent approximately 3% of Dubai's population, illustrating our influence on the local workforce and community.

As a facilitator for company setups and trade, DMCC contributes to the GDP of Dubai and the UAE through additional profits, wages, and rents. We generate economic value principally from licensing and business services, trade facilitation platforms, and district operations. This value is distributed through operating expenditures with Dubai-based suppliers, employee wages and benefits, payments to government entities, community investments, and returns to capital. Our role in attracting foreign direct investment (FDI) further concentrates economic activity: DMCC now accounts for around 11% of all FDI and 7% of the Emirate's GDP. This concentration fosters the exchange of technologies, innovations, and ideas, thereby enhancing productivity in Dubai and the UAE as a whole.

To understand and track our direct economic contribution to Dubai's GDP, we conduct a quantitative assessment annually. The approach combines sector-specific employee data from DMCC-licensed businesses with national accounts from the Dubai Statistics Centre. This provides a clear view of our direct footprint.

DMCC's presence raises productivity through several mechanisms. Firstly, economic density spillovers arise from the clustering of diverse firms within the free zone. Proximity to customers, suppliers, and service providers encourages collaboration, knowledge sharing, and innovation, thereby accelerating time-to-market and reducing transaction costs. Secondly, FDI spillovers occur as international entrants bring capital, know-how, technology, and managerial practices that diffuse into local networks and strengthen domestic value chains. Lastly, supply-chain multipliers materialise as demand from DMCC-based firms stimulates procurement and services across Dubai, supporting jobs and income beyond our direct operations and member base.

Commodity ecosystems remain central to these effects. As the largest diamond trading hub in the world DMCC also plays a pivotal role in coffee and tea by supporting trading, manufacturing, and distribution activities through dedicated infrastructure and services that connect producers, processors, and global buyers.

Our unique mix of residential and commercial properties fosters a vibrant environment in JLT and Uptown where people live and work in proximity, creating a dynamic community and reinforcing place-making outcomes that benefit Dubai's broader economy. Sustainability features, including solar shading, smart metres, smart bins, and motion sensors, help to improve the environmental performance of DMCC properties and enhance operational efficiency for tenants and service partners.

DMCC aims to conduct an analysis to help integrate climate-related risks and opportunities into enterprise risk management and capital planning in the near future. Our ongoing upgrades to building systems, data-driven utilities management, and smart-operations initiatives support resilience while lowering resource intensity.

The economic impact of DMCC extends through our member companies into the broader economy via their suppliers and partners. While specific financial data is not publicly disclosed, our focus remains on enabling business growth, export diversification, and SME development in Dubai. DMCC aligns its operations with international best practices and applicable regulations on data privacy and financial crime compliance; collaboration with organisations such as the Financial Action Task Force (FATF) supports transparency and strengthens adherence to global standards.

Through these efforts, DMCC drives significant indirect economic impacts in line with the UAE's national agenda, supporting sustained productivity gains, high-value employment, and the continued diversification and resilience of Dubai's economy.

## CUSTOMER EXCELLENCE

At DMCC, we continue to prioritise active engagement with our customers and stakeholders to enhance both the living and working experience within our community. Dedicated Member Success and Customer Satisfaction teams ensure that every concern is addressed promptly, while continuously gathering insights to inform service improvements and decision-making.

In addition to our annual satisfaction surveys, DMCC deploys transactional surveys at key service touchpoints. This ensures that member feedback is captured in real time and integrated into our continuous improvement framework. Our goal remains to evaluate at least 90% of DMCC's services through direct stakeholder feedback, ensuring comprehensive visibility into satisfaction drivers.

Customer feedback is managed and tracked through Salesforce, supported by a dedicated call centre team that facilitates prompt service recovery.

Each concern is assessed, and corrective action plans with measurable KPIs are developed and monitored until full resolution — reinforcing our commitment to accountability and continuous improvement.

DMCC achieved a customer satisfaction score of 86% in 2024, marking a 2% improvement compared with 2022. This improvement underscores the effectiveness of DMCC's ongoing service enhancement initiatives and its focus on addressing stakeholder feedback.



Feedback from the DMCC community in 2024 directly informed several key initiatives aimed at enhancing efficiency, responsiveness, and client experience:

Initiative	Outcome	Focus Areas
<b>Introduce a new priority service for visa renewal</b>	Introduce the Priority Service for Visa Renewal SR, whereby clients can have their application prioritized for completion, by the internal DMCC team, which would have an impact on customer experience and satisfaction.	Improved client experience through Priority Service.
<b>Partner Portal</b>	A new portal for consultants, the primary objective is to empower partner consultants to generate package PDF proposals without the drawback of introducing fake leads into the system. This enhancement aims to streamline the process, ensuring that data integrity is preserved without compromising the consultants' ability to simulate package scenarios.	Enhanced efficiency by enabling consultants to create leads with more ease and flexibility.
<b>Expansion of FAIC Integration</b>	Expand the integration process with immigration authorities, as currently we have new visa, visa renewal and visa cancellation already integrated with the FAIC, it was decided to add another service which is new establishment card and do the system integration with the FAIC.	Enhanced efficiency due to faster service delivery
<b>QMS Phase 2</b>	Extending on the initial QMS enhancement, phase 2 includes integrating with the newly opened Emirates ID counters, in addition to booking bulk appointments	Enhanced customer experience through more efficient appointment scheduling and reduced waiting times.
<b>Enhance Freelance License Automation</b>	Introduce the renewal SR for the FreelanceUAE Package and allow the client to apply for New and Renew of Visa applications on the FreelanceUAE member Portal	Improved client experience through reduced response times.

Recognising the importance of maintaining exceptional service quality amid growing demand, DMCC continues to implement a long-term customer experience strategy. A mystery shopping programme provides independent assessments of service standards, supporting data-driven enhancements across customer touchpoints.

On a broader scale, DMCC's Internal Audit & Risk Department plays a vital role in identifying potential negative impacts, risks, and opportunities across departments. Findings are logged into a central system for monitoring and remediation, with progress regularly reviewed by the Board of Directors.

As a government entity, DMCC upholds the highest standards of regulatory compliance, ensuring full alignment with UAE laws and grievance mechanisms applicable to Dubai Government entities. This approach strengthens transparency, accountability, and stakeholder trust across all areas of operation.

# LABOUR PRACTICES

At DMCC, we recognise that our people are central to our success. We are committed to fostering an inclusive workplace where employees can thrive personally and professionally. Our approach emphasises flexibility, well-being, and a broad suite of benefits designed to support diverse needs and lifestyles.

Our practices align with the UN Global Compact (UNGC) and the UN Guiding Principles on Business and Human Rights, reflecting our role as a responsible free zone authority. Through training, awareness-building, and collaborative initiatives, we promote ethical labour standards across the commodities sectors we host, including tea, coffee, diamonds, and gold.

We maintain a transparent approach to compensation, anchored in pay equity and gender balance. Our salary structures are designed with clear, equitable distribution of allowances,

while ensuring Emirati nationals receive benefits aligned with national regulations. Pension contributions are provided in line with UAE law, and we are proud to report a consistently inclusive and respectful workplace, with no incidents of discrimination.

Full-time employees are offered comprehensive medical coverage, life insurance, leave options, and flexible working arrangements. We also provide family-focused support, such as educational allowances and assistance with visa processing, helping us remain an employer of choice for global talent.

Where permanent roles are not practical, we engage temporary staff through partners that comply with UAE Labour Law. These employees receive benefits such as annual leave, health insurance, and other entitlements through their employers, ensuring fairness and compliance across our workforce.

# OUR EMPLOYEES<sup>14</sup>

	Total	Female	Male
<b>2024</b>	333 (174)	146 (67)	187 (107)
<b>2023</b>	313 (144)	137 (54)	176 (90)
<b>2022</b>	314 (95)	119 (51)	195 (44)

A further breakdown of our employees for 2024 can be observed in the table below:

Breakdown by gender	Number	Percentage
<b>Male</b>	187	56%
<b>Female</b>	146	44%
Breakdown by nationality		
<b>UAE</b>	89	27%
<b>Others</b>	244	73%
Breakdown by employee category		
<b>Executive &amp; Senior Management</b>	50	15%
<b>Middle Management</b>	71	21%
<b>Staff</b>	212	64%

<sup>14</sup> Employees are located in the UAE, 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.



At DMCC, employee grades are organised into three primary categories. Grades 20 and above correspond to Executive and Senior Management roles, grades 19 and 18 encompass Middle Management, and grades 17 and below are designated as Staff positions. This structured grading system helps define career progression and responsibilities within the organisation.

The composition of our workforce reflects a balanced structure tailored to support both leadership and operational excellence. Executive and Senior Management comprise 50 individuals, representing 15% of the total employee base. Middle Management accounts for 71 employees, making up 21%. The largest

segment is our Staff category, with 212 employees, constituting 64% of the organisation. This distribution ensures a robust leadership pipeline and a strong foundation at the operational level, enabling effective collaboration and the achievement of our strategic objectives. Within Senior Management, 72% of members are aged between 30 and 50, with the remaining 28% above 50. There are no Senior Management employees under 30. The gender distribution in this group stands at 74% male and 26% female, reflecting the current leadership composition.

On the social front, we organised 44 events and 11 birthday celebrations in 2024. Responding to employee

feedback, we launched clubs such as Coffee, Cooking, Padel & Badminton, and Photography, with regular activities promoting engagement. Attendance rose by 21% overall and by 33% per event. In total, 1,796 attendees participated across all events.

We continue to invest in the physical, mental, and financial wellness of our people through a wide range of initiatives. Employees benefit from awareness sessions, expert-led training, and access to partnerships with wellness providers, sports facilities, and healthy dining establishments. These programmes encourage healthier lifestyles and create a strong sense of belonging at DMCC.

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.

As per UAE Law, only Emirati citizens are provided with pension contribution benefits. Accordingly, DMCC contributes

15% of the employee’s basic salary, housing allowance, and national allowance to the pension fund, while the employee contributes 5%, ensuring a robust retirement benefit for eligible employees. Based on regulation changes in 2023, new employees may contribute 12% of their salaries, while DMCC will contribute up to 8%.

In addition to our permanent employees, DMCC engages a number of temporary workers who contribute to key operational areas, including IT, Production, Customer Service, and Administration. These individuals are contracted through third-party providers and play a valuable role in supporting our business needs. During 2024, DMCC employed a total of 174 temporary staff members, consisting of 107 male and 67 female employees. This flexible workforce model enables us to maintain agility and address fluctuating demands while ensuring the consistent delivery of high-quality service across the organisation.

## EMPLOYEE TURNOVER

While employee movements are a natural part of a dynamic workplace, our focus remains on stability and talent retention. Changes to operational structures, including the outsourcing of specific roles, are carefully managed to balance

efficiency with fairness. By doing so, we ensure that while headcount may shift, our commitment to people-first practices remains constant.

In 2024, DMCC recorded a total of 26 employees leaving the organisation and welcomed 46 new hires during the reporting period. This movement reflects our strategic focus on attracting talent while maintaining workforce stability.

With a total permanent workforce of 333 employees in 2024, the turnover rate stood at 8%, which was a notable decrease from 22% in 2023 and 12% in 2022. This significant reduction in turnover demonstrates our ongoing commitment to employee retention and people-first practices, even as we continue to optimise operations for efficiency and growth.

	Total number of new employee hires entering employment during the reporting period	Total number of employees leaving employment during the reporting period
Total	46	26
<b>Breakdown by gender</b>		
Male	25	14
Female	21	12
<b>Breakdown by age</b>		
Under 30 years old	24	9
30-50 years old	21	15
Over 50 years old	1	2

## DIVERSITY AND INCLUSION

Diversity is part of our DNA. With staff representing a wide range of nationalities and cultural backgrounds, we are proud to mirror the international character of the communities we serve. Our leadership ranks continue to include strong representation from the local community, and our inclusive culture allows employees to share perspectives and learn from one another.

We remain committed to gender equality and are guided by our status as the first free zone in the UAE to sign the Women’s Empowerment Principles (WEPs). By pledging support to the UAE Gender Balance Council, we are deepening our efforts to embed gender equality across all levels of our workforce.

Diversity is a fundamental aspect of our business as we serve international customers, residents, and visitors. Our workforce comprises individuals from 44 different nationalities, with strong representation from the local community. The proportion of UAE Nationals in our workforce increased to 27% in 2024, up from 22% in 2023. Additionally, the representation of UAE Nationals within Executive and Senior Management rose to 30% in 2024, compared to 26% in the previous year. DMCC is committed to providing a safe and supportive environment that encourages employees to share and expand their cultural understanding. Furthermore, we confirm that there were no reported incidents of discrimination in 2024.

## GENDER EQUALITY AND PARENTAL LEAVE

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. Our policies ensure equal opportunities for all employees when balancing career and family life. Both male and female employees are entitled to parental leave, and we track return-to-work and retention rates to continuously strengthen this area. By actively monitoring and improving our practices, we create an environment where employees feel supported through key life transitions.

	2022	2023	2024
<b>Employees entitled to parental leave</b>	314	313	333
Male	195	176	187
Female	119	137	146
<b>Employees that took parental leave</b>	14	17	19
Male	8	11	14
Female	6	6	5
<b>Employees that returned to work in the reporting period after parental leave ended</b>	14	16	19
Male	8	11	14
Female	6	5	5
<b>Employees that returned to work after parental leave ended that were still employed 12 months after their return to work</b>	6	12	15
Male	5	6	9
Female	1	6	6
<b>Retention rates of employees that took parental leave</b>			
Male	100%	100%	100%
Female	100%	100%	86%

DMCC continues to demonstrate strong commitment to supporting employees through family-related transitions. In the past reporting periods, we achieved a 100% retention rate among male employees returning from parental leave, maintaining this exemplary standard across consecutive years. Among female employees, retention rates were similarly robust, with 100% retention in two out of three years and a rate of 86% for 2024, due to one employee who was still on leave as of the data collection period for this report. These figures reflect our dedication to fostering an inclusive and supportive workplace environment that enables employees to successfully balance their professional and personal responsibilities. We have also seen a 7% increase in female employees, compared to 2023.

# TALENT ATTRACTION, DEVELOPMENT AND RETENTION

To stay competitive and deliver excellence to our stakeholders, we continuously invest in the growth and development of our people. Our Learning Management System (LMS) gives employees access to training anytime, anywhere, while our dedicated Academies offer focused programmes in leadership, sales, and customer excellence.

We also participate in regional career fairs, opening pathways for fresh graduates and supporting the UAE's ambition to build a knowledge-driven economy. Every employee receives regular performance and career development reviews, ensuring that learning and growth are embedded into our culture.

## KEY ACHIEVEMENTS OF 2024 INCLUDE:

- 6,857 training hours (3,451 male and 3,406 female)
- 20.6 hours of training per employee (22 on average among female employees, 18 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>15</sup>	Middle Management	Staff	Total
<b>Total number of training hours</b>	786	1,986	4,085	6,857
<b>Employees received regular performance and career development reviews</b>	50	71	212	333 (100%)
<b>Breakdown by gender</b>	14	17	19	
Male	74% (37)	56% (40)	52% (110)	187 (56%)
Female	26% (13)	44% (31)	48% (102)	146 (44%)
<b>Breakdown by age</b>	14	16	19	
Under 30 years old	0% (0)	6% (4)	21% (44)	48
30-50 years old	72% (36)	82% (58)	72% (153)	247
Over 50 years old	28% (14)	12% (9)	7% (15)	38

<sup>15</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.

DMCC supported continuous learning in 2024 by providing employees with anytime, anywhere access to LinkedIn Learning and offering a comprehensive range of professional development initiatives. These included three tailored career development plans, two dedicated DMCC Academies for both managers and individual contributors, and increased support for professional memberships (now totalling 40), up by 5 from the previous year. Employees also benefited from tailored language programmes, including Arabic Level 1 and 2 for non-speakers, in-house soft skills and IT systems training, as well as technical and AI-focused courses delivered in partnership with external providers such as the Dubai Future Foundation.

DMCC shows tremendous support for employees during transitional phases of their career through fair and transparent transition arrangements that extend beyond statutory requirements. Under UAE Labour Law, eligible employees are entitled to end-of-service gratuity payments; however, DMCC enhances this provision to recognize employee contributions and ensure financial stability during career transitions. Employees completing one year of service receive a lump-sum payment equivalent to one month's base salary. Those with two years of service are granted one and a half months' base salary, in addition to the first year's entitlement. For employees serving three years or more, gratuity is calculated based on the benefits of the initial two years, plus two months' base salary for every additional year of service. This progressive policy reflects DMCC's commitment to equitable employment practices and to supporting workforce wellbeing beyond legal obligations.



# RESPONSIBLE BUSINESS ECOSYSTEM

# DIGITALISATION

At DMCC, digitalisation is not only about efficiency and innovation, it is also a key driver of sustainability. In 2024, our IT Department launched a range of initiatives that enhanced the customer experience, strengthened security, and reduced our environmental footprint, ensuring that technology directly contributes to our corporate sustainability goals.

## SMART AND SUSTAINABLE DIGITAL SOLUTIONS

We continued to expand smart services across the business, including the migration of processes to Salesforce Lightning and the rollout of digital portals for members and partners. These solutions reduced paper-based workflows, accelerated service delivery, and improved accessibility for our stakeholders. By embedding sustainability into digitalisation, we enabled businesses in our ecosystem to operate more efficiently and responsibly.

## GREEN IT AND ENVIRONMENTAL RESPONSIBILITY

A dedicated focus on sustainable IT practices marked 2024 as a year of tangible impact. Through certified green recycling, we safely disposed of 6.5 tonnes of electronic waste, diverting harmful materials from landfill and supporting the UAE's environmental objectives. Our paperless initiative reduced paper usage by 38%, creating significant cost savings while promoting eco-friendly operations. We also accelerated our cloud migration programme, moving 45 servers and critical infrastructure to the cloud. This transition not only improved resilience and scalability but also reduced our carbon footprint by lowering reliance on energy-intensive on-site systems.

## ENABLING FLEXIBLE, LOW-IMPACT WORK

Technology has also played a central role in shaping more sustainable ways of working. By enhancing remote work capabilities and connectivity, we reduced the need for commuting, lowering associated emissions while supporting employee work-life balance.

## SECURITY, COMPLIANCE, AND TRUST

Alongside sustainability gains, our digitalisation agenda strengthened resilience and compliance. We maintained ISO 27001 certification, collaborated with regulators to improve transparency, and deployed advanced threat detection systems, all while embedding energy-efficient and responsible practices into IT operations.

At DMCC, we take data privacy and security extremely seriously. In 2024, there were no complaints received from regulatory bodies concerning breaches of customer privacy.

DMCC received one substantiated external complaint from a third-party security researcher regarding a supplier engaged for an event to onboard prospective clients, certain client data had been stored in a repository that was at risk of being publicly accessible. DMCC's Information Security team immediately contained the issue, coordinated remediation with the vendor, informed the Internal Audit Department and DMCC Information Security Committee, notified potentially affected clients for transparency, and escalated the matter to the Executive Management, who terminated the vendor's contract for non-compliance with DMCC data-security standards. All other threats during the period were contained or averted with no harm to DMCC's stakeholders, and all business units were subsequently briefed and trained; third-party contracts were updated to include explicit data-protection clauses with penalties and consequences for breaches.

## DRIVING INNOVATION THROUGH SUSTAINABILITY

Our digitalisation journey also aligns with Dubai’s broader Smart City strategy, positioning DMCC as a hub where technology, business, and sustainability intersect. By investing in next-generation tools such as IoT-powered infrastructure, AI-driven analytics, and blockchain solutions, we are not only optimising internal operations but also enabling our members to adopt more sustainable business models. This approach ensures that technological innovation directly supports responsible growth.

Furthermore, the integration of sustainability metrics into our IT governance framework ensures that every new digital initiative is assessed for both operational benefits and environmental impact. This mindset transforms digitalisation from being a purely technical enabler to a core pillar of DMCC’s sustainability strategy, amplifying our contribution to the UAE’s climate commitments and Net Zero goals.

## LOOKING AHEAD

The progress made in 2024 demonstrates how technology can advance DMCC’s broader sustainability agenda. By aligning digitalisation with green IT practices, we are building a more efficient, secure, and environmentally responsible digital ecosystem. As we continue to innovate, we remain committed to expanding smart, low-impact solutions that support both business excellence and climate goals.



# 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. We have also maintained ISO 9001 certification for the UAE Kimberley Process office, reinforcing our commitment to operational excellence and continual improvement.

In line with our sustainability goals, DMCC prioritises responsible procurement practices. All tenders are conducted through our digital procurement system, Tejari, which integrates both technical and commercial scoring. For expenditures between AED 25,000 and AED 500,000, a mandatory “best value” approach is applied, and expenditures exceeding AED 500,000 must be processed through the e-procurement portal. This approach ensures that only technically qualified vendors proceed to the commercial stage, where the project is awarded to the vendor with the lowest compliant bid.

## VENDOR QUALIFICATION AND ETHICAL CONDUCT

DMCC ensures that all vendors meet stringent qualification criteria, including trade licence validity, insurance coverage, and compliance with our Standard Base Contract terms and the DMCC Code of Conduct. Every supplier going through the tender process is screened using environmental criteria through a questionnaire, which serves as a proxy for evaluating potential negative social and environmental impacts across the supply chain. As part of our procurement calculation methodology, any supplier with a UAE trade licence operating within the country and employing locally hired staff is considered a local supplier. While no formal preference is granted, our default position is to prioritise local vendors before approaching international markets, thereby supporting the national

economy and reducing environmental impacts associated with long-distance logistics where possible. Our Supplier Code of Conduct outlines 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 of incidents of child, forced, or compulsory labour. By adhering to these rigorous standards and practices, we 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.

## KEY PROCUREMENT ACHIEVEMENTS

In 2024, DMCC implemented a series of procurement enhancements to further strengthen governance, transparency, and efficiency across our supply chain:

- **Updated Procurement Policy:**

The new policy introduced stronger controls for single sourcing, spot buys, and evaluation procedures, reinforcing consistency, fairness, and accountability in the way we source goods and services.

- **Rollout of a Contract Management System:** DMCC deployed a new digital Contract Management System to streamline contract workflows, improve traceability and reporting, and enhance overall operational efficiency and oversight.

- **Development of Digital**

- **Requirement-Gathering Tools:**

We developed digital Contracts & Procurement Request forms to standardise and digitalise the collection of requirements from internal stakeholders. These tools are designed to strengthen data quality, improve turnaround times, and enable faster, data-driven decision-making.

- **Launch of a Digital Travel Platform:**

A new digital Travel Platform was introduced to centralise and manage travel-related procurement more effectively, improving transparency, cost control, and user experience.



## FUTURE ENHANCEMENTS IN PROCUREMENT

Looking ahead, DMCC plans to update its procurement policy and processes to include more measurable and quantifiable sustainability assessments of our suppliers. Building on the digital tools and systems implemented in 2024, these enhancements will ensure that our procurement practices continue to align with our commitment to ethical,

responsible, and sustainable trade, while providing greater visibility into supplier performance and ESG-related risks and opportunities. We plan to roll out an updated version of the Procurement Policy, and also enhance our supplier qualification and assessment process with ESG-focused requirements for 2025.

## PROCUREMENT BUDGET SPENT ON LOCAL SUPPLIERS

Year	2022	2023	2024
<b>Local suppliers<sup>16</sup></b>	564,817,666.88	909,740,871.26	709,827,988
<b>International suppliers</b>	17,781,957	25,481,619.80	28,891,224
<b>Percentage</b>	97%	97%	96%

<sup>16</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 anti-corruption measures.

In 2024, we conducted Fraud Risk Assessments across the organisation. Fraud Risk Assessment is performed on a systematic and recurring basis involving the appropriate personnel. Fraud Risks that their residual risk ratings were medium or high were risks were added to DMCC's Integrated Risk Management System (IRMS) to ensure adequate controls are in place and that those risks are monitored continuously.

DMCC has established Fraud Control Policies and Procedures in order to reduce the opportunity for Fraud and Corruption in DMCC by putting adequate controls in place to assist in the detection and prevention of Fraud and Corruption. DMCC is committed to the highest ethical and moral standards, transparency and accountability. All employees and Board Members are expected to share the same commitment and to lead by example in ensuring adherence to appropriate

regulations, procedures, practices, and codes of conduct. DMCC expects individuals and organisations with whom it does business to act with honesty and integrity at all times.

An organisation wide online training was conducted for all employees in 2024. Confirmation of understanding and knowledge of these policies was obtained.

Our Internal Audit & Risk department conducts regular assessments to identify and mitigate risks related to anti-corruption. DMCC has a zero-tolerance approach to Fraud. DMCC Business Units conduct regular assessments to identify relevant Fraud Scenarios and map those fraud scenarios so that steps can be taken to prevent and mitigate the risks of fraud. 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 organisation-wide 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 non-compliance with laws or regulations.

Following our commitment last year, DMCC successfully established a comprehensive register capturing all legislation, laws, and regulations that the organisation is mandated to follow. This now serves as a valuable resource that helps us understand of our legal obligations and reinforce our commitment to adherence and accountability.



# GRI CONTENT INDEX

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GRI Standard / Other	Disclosure	Section	Page Number(s)	Omissions	
				Requirement(s) Omitted	Explanations
<b>General Disclosures</b>					
GRI 2: General Disclosures 2021	2-1 Organisational details	DMCC at Glance	14-18		
	2-2 Entities included in the organisation's sustainability reporting	DMCC at Glance	14-18		
	2-3 Reporting period frequency and contact point	About this Report	5, 7		
	2-4 Restatements of information	About this Report	5		
	2-5 External assurance	Assurance Statement	8-9		
	2-6 Activities, values chain, and other business relationship	DMCC at Glance	14-18		
	2-7 Employees	Labour Practices	73-80	Requirement b. (v)	Not applicable, DMCC has no part-time employees.
	2-8 Workers who are not employees	Occupational Health & Safety	53-59, 76-77	Requirements a, b, c	Some data is not available as DMCC does not have a system or methodology to calculate it.
	2-9 Governance structure and composition	Governance & Leadership	63-67		
	2-10 Nomination and selection of the highest governance body	Governance & Leadership	63-67	Requirement b. (i, ii, iii, iv)	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 of Dubai and the DMCC law. Further information on the criteria is omitted due to confidentiality constraints.
	2-11 Chair of the highest governance body	Governance & Leadership	63-67		

	2-12 Role of the highest governance body in overseeing the management of impacts	Governance & Leadership	63-67		
	2-13 Delegation of responsibility for managing impacts	Governance & Leadership	63-67		
	2-14 Role of the highest governance body in sustainability reporting	Governance & Leadership, Our Materiality Approach	63-67, 22-27		
	2-15 Conflict of interest	Governance & Leadership	63-67		
	2-16 Communication of critical concerns	Governance & Leadership, Ethical Business	63-67, 91-92	Requirement b.	As DMCC is a government entity, this disclosure was omitted due to confidentiality constraints.
	2-17 Collective knowledge of the highest governance body	Governance & Leadership	63-67		
	2-18 Evaluation of the performance of the highest governance body			Requirements a, b, c	As DMCC is a government entity, this disclosure was omitted due to confidentiality constraints.
	2-19 Remuneration policies			Requirements a, b	As DMCC is a government entity, this disclosure was omitted due to confidentiality constraints.
	2-20 Process to determine remuneration			Requirements a, b	As DMCC is a government entity, this disclosure was omitted due to confidentiality constraints.
	2-21 Annual total compensation ratio			Requirements a, b, c	As DMCC is a government entity, this disclosure was omitted due to confidentiality constraints.
	2-22 Statement on Sustainable development strategy	Sustainability at DMCC	10-12		
	2-23 Policy Commitments	Governance & Leadership	68		
	2-24 Embedding policy commitments	Governance & Leadership	63-68		
	2-25 Processes to remediate negative impacts	Customer Satisfaction & Engagement	71-73		
	2-26 Mechanisms for seeking advice and raising concerns	Customer Satisfaction & Engagement	71-73		
	2-27 Compliance with laws and regulations	Ethical Business Conduct	85, 91-92		

	2-28 Membership associations	About this Report	7, 20, 25, 60-62		
	2-29 Approach to Stakeholder engagement	DMCC at Glance, Our Materiality Approach	14-15, 22-25		
	2-30 Collective bargaining agreements				Collective bargaining agreements are prohibited under UAE labour law.
<b>Material Topics</b>					
GRI 3: Material Topics 2021	3-1 Process to determine material topic	Our Materiality Approach	22-27		
	3-2 List of Material topics	Our Materiality Approach	22-27		
<b>Governance &amp; Leadership</b>					
GRI 3: Material Topics 2021	3-3 Management of Material Topics	Governance & Leadership	63-68	Requirement e. (iii)	As DMCC is a government entity, this disclosure is omitted due to confidentiality constraints.
<b>Economic Performance</b>					
GRI 3: Material Topics 2021	3-3 Management of Material Topics	Governance & Leadership, Economic performance	63-68, 69-70		
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 constraints.
	201-2 Financial implications and other risks and opportunities due to climate change				DMCC is in the process of assessing risks or opportunities posed by climate change. It currently does not have a system in place to calculate the financial implications or costs or to make revenue projections.
	201-3 Defined benefit plan obligations and other retirement plans	Labour Practices	73-76		
	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 Performance	14, 28-31, 69-70		
	203-2 Significant indirect economic impacts	Economic Performance	69-70		
<b>Talent Attraction, Development &amp; Retention</b>					
GRI 3: Material Topics 2021	3-3 Management of Material Topics				

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 constraints.
	202-2 Proportion of senior management hired from the local community	Talent attraction, Development & Retention	78		
GRI 404: Training & Education 2016	404-1 Average hours of training per year per employee	Talent attraction, Development & Retention	81		
	404-2 Programs for upgrading employee skills and transition assistance programs	Talent attraction, Development & Retention	56, 80-82		
	404-3 Percentage of employees receiving regular performance & career development reviews	Talent attraction, Development & Retention	81		
<b>Customer Satisfaction &amp; Engagement</b>					
GRI 3: Material Topics 2021	3-3 Management of Material Topics		71-73		
<b>Labour Practices</b>					
GRI 3: Material Topics 2021	3-3 Management of Material Topics	Labour Practices	74-80		
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Labour Practices	74-80		
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Labour Practices	74-80		
	401-3 Parental leave	Labour Practices	74-80		
	405-1 Diversity of governance bodies and employees	Labour Practices	74-80		
	405-2 Ratio of basic salary and remuneration of women to men	Labour Practices	74-80		
	406-1 Incidents of discrimination and corrective actions taken	Labour Practices	74-80		
<b>Sustainable City</b>					

Climate Change & Energy					
GRI 3: Material Topics 2021	3-3 Management of Material Topics		28-33		
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Energy, Water, and Waste Management	28-33		
	302-2 Energy consumption outside of the organization	Energy, Water, and Waste Management	28-33		
	302-3 Energy intensity	Energy, Water, and Waste Management	28-33		
	302-4 Reduction of energy consumption	Energy, Water, and Waste Management	28-33		
	302-5 Reductions in energy requirements of products and services			Requirements a, b, c	This disclosure is not applicable due to the nature of DMCC's operations.
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Energy, Water, and Waste Management	35-41		
	305-2 Energy indirect (Scope 2) GHG emissions	Energy, Water, and Waste Management	35-41		
	305-3 Other indirect (Scope 3) GHG emissions	Energy, Water, and Waste Management	35-41		
	305-4 GHG emissions intensity	Energy, Water, and Waste Management	35-41		
	305-5 Reduction of GHG emissions	Energy, Water, and Waste Management	35-41		
	305-6 Emissions of ozone-depleting substances (ODS)				This disclosure is not applicable due to the nature of DMCC's operations.
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions				This disclosure is not applicable due to the nature of DMCC's operations.
Waste Management					
GRI 3: Material Topics 2021	3-3 Management of Material Topics		28-33, 40-41		
	306-1 Waste generation and significant waste-related impacts	Energy, Water, and Waste Management	28-33, 40-41		
	306-2 Management of significant waste-related impacts	Energy, Water, and Waste Management	28-33, 40-41		

	306-3 Waste generated	Energy, Water, and Waste Management	28-33, 40-41		
	306-4 Waste diverted from disposal	Energy, Water, and Waste Management	28-33, 40-41		
	306-5 Waste directed to disposal	Energy, Water, and Waste Management	28-33, 40-41		
Occupational Health & Safety					
GRI 3: Material Topics 2021	3-3 Management of Material Topics		53-58		
GRI 403: Occupational Health & Safety 2018	403-1 Occupational health and safety management system	Occupational Health & Safety	53-58		
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational Health & Safety	53-58		
	403-3 Occupational health services	Occupational Health & Safety	53-58		
	403-4 Worker participation, consultation, and communication on occupational health and safety	Occupational Health & Safety	53-58		
	403-5 Worker training on occupational health and safety	Occupational Health & Safety	53-58		
	403-6 Promotion of worker health	Occupational Health & Safety	53-58		
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational Health & Safety	53-58, 84-85		
	403-8 Workers covered by an occupational health and safety management system	Occupational Health & Safety	53-58		
	403-9 Work-related injuries	Occupational Health & Safety	53-58		
	403-10 Work-related ill health	Occupational Health & Safety	53-58		
GRI 410: Security Practices	410-1 Security personnel trained in human rights policies or procedures	Occupational Health & Safety, Security Practices	58-59		
Community Impact & Resident Well-being					
GRI 3: Material Topics 2021	3-3 Management of Material Topics		20-25, 59-61		

GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and Development programs	Community Engagement, DMCC at Glance, Our Materiality Approach	20-25, 59-61	Requirement a (i, ii, iii, vi, vii, viii)	DMCC does not currently have mechanisms to evaluate these criteria.
	413-2 Operations with significant actual and potential negative impacts on local communities	Community Engagement, DMCC at Glance			
Responsible Business Ecosystem					
Supply Chain Sustainability & Responsible Sourcing					
GRI 3: Material Topics 2021	3-3 Management of Material Topics		87-90		
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Supply Chain Sustainability & Responsible Sourcing	80		
GRI 408: Child Labour 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Supply Chain Sustainability & Responsible Sourcing	88		
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	88		
Ethical Business Conduct					
GRI 3: Material Topics 2021	3-3 Management of Material Topics		91-92		
GRI 205: Anti-Corruption 2016	205-1 Operations assessed for risks related to corruption	Ethical Business	91-92		
	205-2 Communication and training about anti-corruption policies and procedures	Ethical Business	91-92		
	205-3 Confirmed incidents of corruption and actions taken	Ethical Business	91-92		
GRI 206: Anti-Competitive Practices 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Ethical Business	91-92		
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Digitalisation	84-86		