

DMCC

2018 SUSTAINABILITY REPORT

Shaping the
Future of Trade

**MADE
FOR
TRADE**

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"DMCC is committed to the UN's 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals that outline a vision aimed at targeting the urgent environmental, political and economic challenges facing our world."

Ahmed Bin Sulayem
Executive Chairman and CEO, DMCC



LEADERSHIP'S STATEMENT

The leadership of the United Arab Emirates (UAE) has committed to an economic diversification agenda that is both inclusive and sustainable.

As a Government of Dubai Authority, globally leading free zone and unique commodities trading hub, it is incumbent on DMCC to support the nation's economic growth plan, whilst delivering a sustainable future for all.

2018 was a landmark year for DMCC in this regard, and saw us set the example of how to positively affect the economy, community and environment around us. We are particularly delighted about the progress we have made against our Smart and Sustainable District Strategy.

The release of the second annual DMCC Sustainability Report informs our stakeholders, in detail, about the progress made towards our long-term, integrated and comprehensive sustainability strategy.

The report cites achievements and evidences how we have continually improved the integration of the UN Global Compact and its principles into our corporate strategy, culture and day-to-day operations.

Creating value for both business and society is the theme of the report, and the

importance of partnership, cooperation, innovation and continuous engagement with stakeholders is evidenced throughout. We remain committed to the United Nation's 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals (SDGs), and locally have increased our contribution to Dubai initiatives and national strategies.

Much has been achieved to date but crucially, we recognise that long-lasting progress requires continuous improvement. In 2018, we established the DMCC SDGs Steering Committee – with representation from across the entire organisation – to direct our strategy and ensure sustainability is embedded in absolutely everything we do.

With the continued support of our employees and partners in both government and business, the future is very encouraging indeed.

Looking ahead, DMCC will continue to attract, facilitate and promote global trade through Dubai, and do all it can to remain a positive force for good in the world.



Ahmed Bin Sulayem
Executive Chairman and CEO, DMCC

ABOUT THIS REPORT

This report documents DMCC's socio-economic and environmental performance and initiatives from 1 January to 31 December 2018.

Information covered

The report outlines DMCC's performance against its sustainability framework. It details DMCC's progress under its four strategic sustainability pillars: Marketplace, People, Community and Environment. Additionally, it highlights DMCC's future commitments and targets.

Reporting frameworks

This report has been prepared in accordance with the GRI Standards: Core Option. As signatories to the United Nations Global Compact (UNGC) since August 2017, the report serves as DMCC's Communication on Progress (COP) on the United Nations Global Compact (UNGC) Principles. It also highlights DMCC's efforts to advance the United Nations Sustainable Development Goals (UN SDGs) as well as DMCC's contributions in achieving the vision and objectives of national charters, including the United Arab Emirates (UAE) Vision 2021 and Dubai Plan 2021.

Material topics

DMCC's 2018 sustainability report continues with the material topics identified in early 2018 as part of the 2017 sustainability report that consulted internal and external stakeholders. In 2018, DMCC focused on defining its sustainability action plans to increase its positive contribution to the topics that are most material according to its stakeholders.

The 2018 report was developed by DMCC with support from a global consultancy firm which also conducted the assurance readiness exercise by assessing the key material disclosures.

Reporting topic boundaries¹

The reporting topic boundaries include entities over which DMCC has direct control: its permanent employees, owned and leased properties, assets and infrastructure, free zone regulatory activities and Master Community. Certain topics included entities which DMCC has a direct and indirect influence on. The boundaries are clearly defined throughout the report for each topic.

In 2018, DMCC implemented an organisational restructuring across departments to optimise operational excellence.

Feedback and suggestions

DMCC welcomes your feedback and suggestions on its sustainability performance, commitments and progress. Please direct your feedback to DMCC.sustainability@dmcc.ae

¹ DMCC follows GRI Standards' definition of a topic boundary, which is to describe where the organisation's environmental, social and economic impacts occur and the organisation's involvement across its supply chain.

KEY HIGHLIGHTS

People

- **315** – Permanent employees of 43 nationalities
- **Zero** – Employee fatalities
- **Zero** – Work-related accidents involving DMCC employees
- **14%** – Emirati representation in the total permanent workforce, a 10% increase year on year
- **23%** – Emirati representation in the senior management team
- **25%** – Females in DMCC senior management; and 37% of the total workforce are females
- **15** awareness initiatives conducted around mental, physical and financial health conducted as part of the well-being programme



Marketplace

- **Zero** – Reported incidents of corruption
- **Zero** – Fines for non-compliance with social and economic laws or regulations
- **Zero** – Incidents of customer data breach recorded
- **50+** – Events organised for customers, attended by 4,000 participants
- **4** – New value-added services introduced based on 2017 satisfaction survey feedback
- Launched the DMCC Coffee Centre
- Signed the UN Women's Empowerment Principles (WEPs) and became a member of the UAE WEPs taskforce



Environment

- Revised environmental compliance requirements as part of DMCC's Health, Safety and Environment (HSE) Guidelines for DMCC employees, member companies, contractors and sub-developers and owners' associations
- Developed a detailed plan for DMCC's environmental objectives under DMCC's Smart and Sustainable District Strategy
- One JLT building retrofitting initiated and registration with US Green Building Council (USGBC) ARC platform
- Transitioned to environmentally friendly bio-agents for the water quality treatment of JLT lakes
- Conducted landscaping enhancements throughout the JLT district
- Initiated recycling of paper, cans, plastics and batteries across the Master Community
- 100 trees were planted in multiple locations in the Master Community



Community

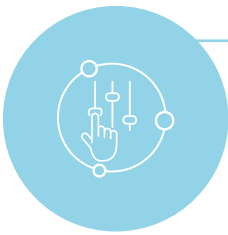
- Continued development of a 3D Digital Twin of the Master Community
- Launched DMCC Smart and Sustainable District Strategy
- AED 365,000 donated through DMCC Grant Funds to Diamond Development Initiative (DDI) to support the education of artisanal miners in the Democratic Republic of the Congo
- 125,000+ visitors to the JLT-hosted Dubai Fitness Challenge Village



SPHERE OF INFLUENCE

DMCC has many stakeholders with varying levels of influence

Direct control



- Free zone regulatory activities
- DMCC's owned and leased properties
- DMCC permanent employees
- DMCC owned assets and infrastructure
- Master Community

Direct influence



- Free zone member companies
- Suppliers, contractors and sub-developers
- Members of Dubai Good Delivery (DGD) and members of Kimberley Process certification
- Owners Association Management companies

Indirect influence



- Industry and trade associations
- Property owners and occupiers
- Academic institutions
- Government institutions
- Financial institutions
- Non-Governmental Organisations (NGOs)



CREATING VALUE

DMCC is home to a vibrant community, robust infrastructure, and world-class services



Resources and assets

Talent

A diverse and skilled workforce of over 40 nationalities and 315 employees.

Infrastructure and property

The future of a smart and sustainable district of 200 hectares with over 100,000 people living and working across 68 towers.

Partnership and suppliers

Offering industry and trade associations, financial institutions, government institutions, international connectivity, and global trading platforms.

Value adding activities

Better connectivity

An interconnected free zone in one of the fastest growing cities, providing access to Dubai's strategic connections to global financial centres and emerging economies.

World-class customer experience

A portfolio of leading innovative platforms, tools, and services which make doing business efficient and simple.

Offering

A unique combination of free zone status, residential and commercial property, commodity exchanges, legal and regulatory frameworks.

Free Zone

- Licensing and company formation
- 0% corporate and income tax
- 100% business ownership and capital repatriation
- Flexible solutions – options to set up as a branch, subsidiary or new limited liability company
- World-class business services: administration, insurance and recruitment services; legal clinics; disputes center; dependent visa applications; medical fitness applications; internship services; free zone company will; VAT clinics; DUNS accreditation; property brokerage; and DMCC commercial card

Commodities

Industry participants and free zone member companies have access to various trading platforms including Dubai Gold & Commodities Exchange, Dubai Diamond Exchange, DMCC Tradeflow, Dubai Shariah Asset Management, the DMCC Tea Centre and DMCC Coffee Centre. A range of commodities-backed financial investment tools are also available.

Property

A multi-purpose district transforming business environments and residential communities into a smart city.

Value creation

Dubai as a global gateway for trade

With the combined revenue of its member companies, DMCC contributes around 10% to Dubai's GDP.

Supporting the 2030 agenda for sustainable development

DMCC supports the UN SDG 2030 agenda and the UAE Vision 2021. The Sustainability Knowledge Series and the industry outreach programmes help raise awareness on the sustainability agenda. DMCC is also a signatory to the UNGC principles and UN WEPs.

Innovative business environment

DMCC offers new business solutions, ideas, and platforms with a 100% digital interface goal. DMCC newly launched the Coffee Centre and is establishing a Dubai Design Academy for the jewellery industry.

Well-being and happiness

The JLT community is a family friendly, vibrant and participatory community with a 55,000 m² central park and a network of promenades along the lakes. JLT offers various sporting, recreational and cultural activities such as Family Day and Fitness Village.





DRIVING SUSTAINABILITY



DRIVING SUSTAINABILITY

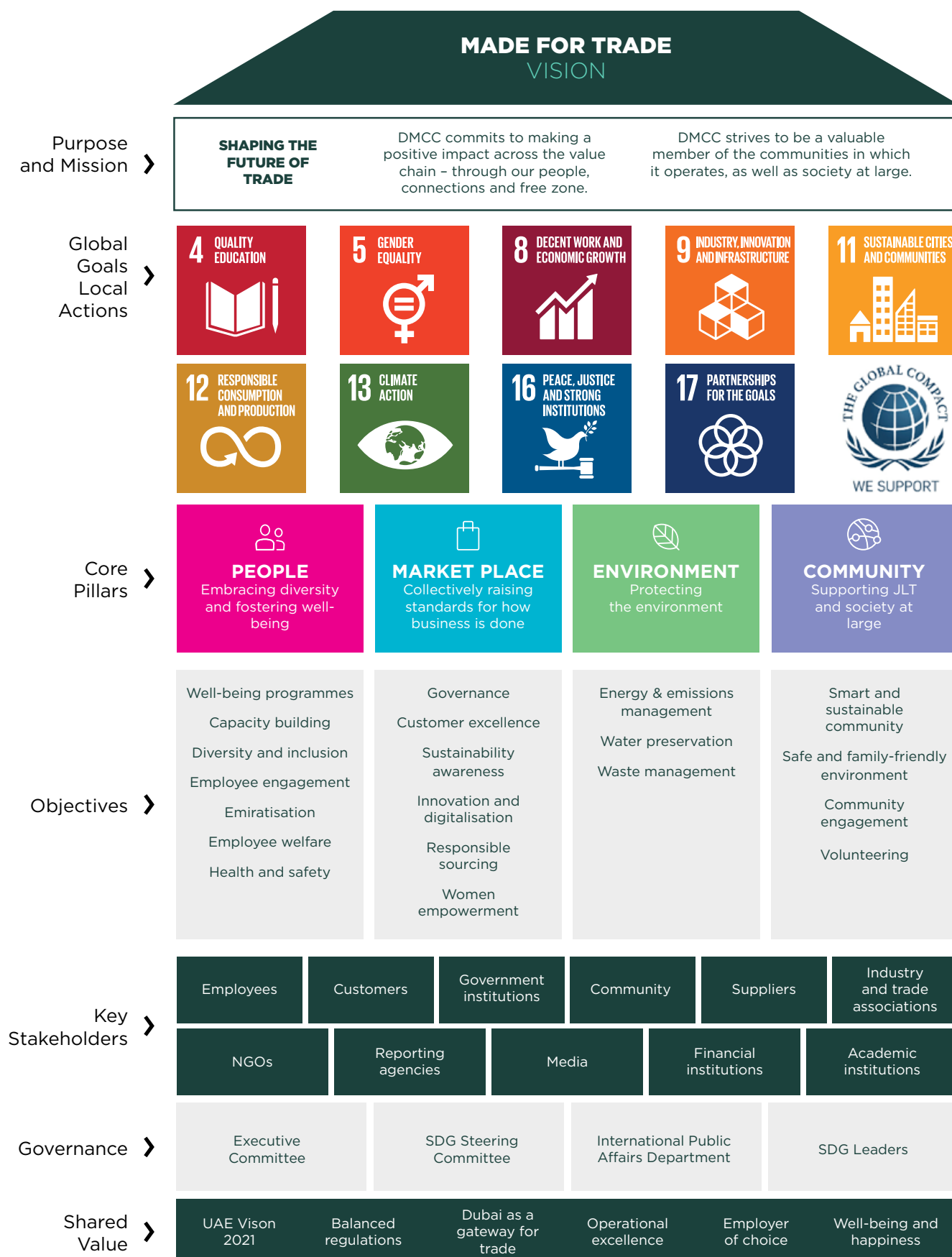
Adopting a sustainable approach is an inherently long-term commitment that becomes embedded in an organisation, its strategies and its daily approach.

DMCC remains committed to its declared approach – alignment with the UN SDGs, as a signatory to the UNGC and a solid supporter of the UAE Vision 2021 and the Dubai Plan 2021. DMCC's sustainability strategy is driven by its four core pillars of sustainability – **people, marketplace, environment and community** – and continuously strives to adopt programmes and initiatives in line with the objectives earmarked under each pillar.

To underpin its sustainability vision and bolster sustainability governance, DMCC appointed a new, corporate-level Sustainable Development Goals Steering Committee (SDG SC) in 2018 to oversee and monitor the progress of DMCC's commitments and develop a corporate-wide sustainability strategy. The Committee includes a number of members of the Executive Committee and senior management.

The SDG SC meetings will commence in 2019. The terms of reference and reporting lines for the committee are under development and are expected to be operational by early 2019. The committee will engage with all departments and assign key performance indicators (KPIs) and smart targets for sustainability initiatives. The implementation of those initiatives will be regularly tracked by the committee to ensure that DMCC is creating a positive impact across its value chain.

The DMCC sustainability strategy framework:



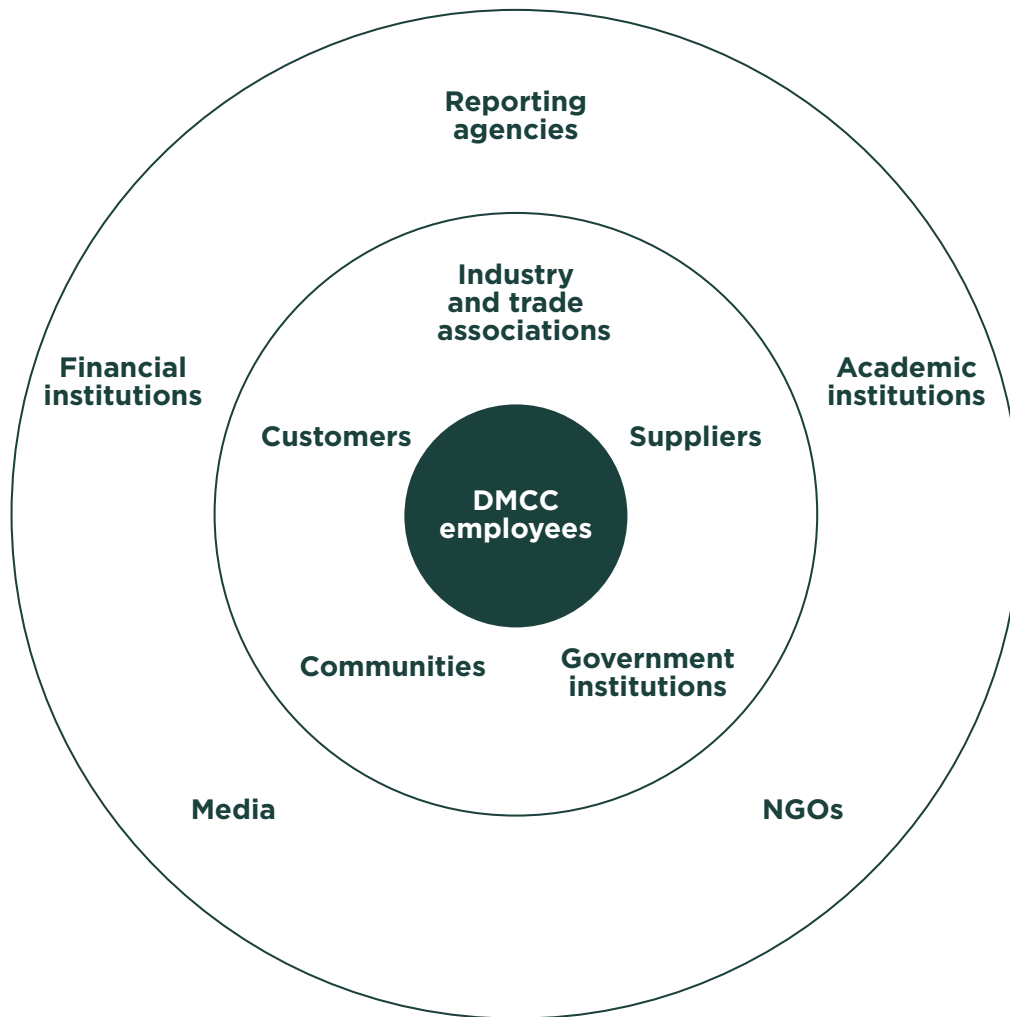
ENGAGING STAKEHOLDERS

Stakeholder engagement is a continuous process across DMCC's business operations. DMCC identified its key stakeholder groups during its previous reporting cycle through a stakeholder mapping exercise.

DMCC considers stakeholder engagement and partnership building as key elements for business growth and success. By understanding stakeholders' needs and interests, DMCC explores new, innovative ways to work together in partnership.



DMCC stakeholder groups include the following:



“

DMCC collaborates with international and national stakeholders to ensure its strategic planning responds effectively to market trends, customer needs, and growth opportunities. DMCC’s inclusive approach positions it as an industry leader in the precious metals market locally and globally.

”

Feryal Ahmadi, Chief Operating Officer, DMCC

DMCC stakeholder engagement model

DMCC utilises diverse tools and platforms to engage with its stakeholders on any number of desired interactions ranging from informing to consulting, involving, collaborating and empowering.

Who	Objectives	How
Customers	<ul style="list-style-type: none"> • Provide diverse innovative solutions • Provide sustainable infrastructure • Enhance industry insights and awareness of the leading practice • Support member companies in their sustainability journey through knowledge-sharing and collaboration on key sustainability initiatives 	<ul style="list-style-type: none"> • Customer satisfaction surveys • Events (Knowledge Series, seminars, workshops, training, panel discussions) • Industry clubs • Publications (e.g. DMCC Thought Leadership reports) • Rules and regulations • Members' portal • Social media
Suppliers, contractors, sub-developers	<ul style="list-style-type: none"> • Transparent procurement process • Digitalisation of tendering process • Supporting the development of local suppliers • Employee welfare • Health and safety • Environmental performance 	<ul style="list-style-type: none"> • Procurement processes • iProcurement (suppliers' portal) • Inspections • Health, safety and environment (HSE) guidelines and construction manual
Government institutions (local and international)	<ul style="list-style-type: none"> • Partner to address global and local challenges • Comply with laws, regulations and policies • Drive best practice and standards 	<ul style="list-style-type: none"> • Meetings • Member of governmental committees • Government relations team • Events • Audits and inspections
International organisations	<ul style="list-style-type: none"> • Address global challenges through partnership • Collaborate to enhance certification standards 	<ul style="list-style-type: none"> • MoUs • Events • Meetings • Ongoing dialogue
DMCC employees and representatives	<ul style="list-style-type: none"> • Attract and retain the best talent by being an employer of choice • Support the development and growth of our employees • Employee welfare 	<ul style="list-style-type: none"> • Satisfaction surveys • Internal communication channels • Social media • Training and career growth opportunities

Who	Objectives	How
	<ul style="list-style-type: none"> • Health and safety • Provide equal opportunity 	<ul style="list-style-type: none"> • Events • Code of conduct and human resources policies • Employees' internal portal • Social activities
Communities	<ul style="list-style-type: none"> • Create economic and social value for our community while minimising environmental impact • Ensure a safe and healthy community 	<ul style="list-style-type: none"> • Events • Publications • Social media • Community engagement initiatives • Volunteering initiatives
Industry and trade associations	<ul style="list-style-type: none"> • Knowledge-sharing and exchange of expertise • Partner to research new technologies and solutions 	<ul style="list-style-type: none"> • Meetings • MoUs • Ongoing dialogue
Financial institutions	<ul style="list-style-type: none"> • Facilitate trade through the creation of digital platforms • Identification of investment opportunities 	<ul style="list-style-type: none"> • Meetings • Contracts • Digital platforms • Ongoing dialogue
Non-governmental organisations	<ul style="list-style-type: none"> • Partner to support the advancement of global goals • Partner for employee volunteering and community engagement initiatives • Collaborate to drive best practices and enhance awareness of sustainability-related topics 	<ul style="list-style-type: none"> • Meetings • MoUs • Sponsorships • Memberships
Media	<ul style="list-style-type: none"> • Ensure DMCC is represented accurately with up-to-date information 	<ul style="list-style-type: none"> • Industry events • Media campaigns
Academic institutions	<ul style="list-style-type: none"> • Engage with universities to support local graduates • Partner with universities to incubate innovative solutions and develop Thought Leadership reports 	<ul style="list-style-type: none"> • Career fairs • Research and development projects • MoUs

Driving sustainability through stakeholder engagement and knowledge transfer

DMCC conducted stakeholder-focused events during 2018 to raise awareness, share knowledge and increase participation.

DMCC integrates sustainability into its outreach programme, specifically its member companies. The Sustainability Knowledge Series is designed to encourage member companies to adopt sustainability practices and initiatives.

In 2018, DMCC organised two Sustainability Knowledge Series in collaboration with the UNGC. The events raised awareness on UN SDGs as a framework for organisations to address global challenges through partnerships. The second event addressed the importance of gender balance and how organisations can create inclusive working environments supporting SDG 5 –

Gender Equality. Both events received high satisfaction rates. In 2019, DMCC plans to conduct similar sessions addressing various topics related to sustainability.

In addition, DMCC holds topic-specific events that address pressing sustainability challenges. In 2018, DMCC held three training sessions on employment law. Member companies learned about the UAE Employment Law and mandatory compliance requirements. Other training sessions covered topics such as cyber risk and compliance with General Data Protection Regulation (GDPR) requirements and anti-money laundering risk mitigation measures. DMCC is committed to engaging with member companies on sustainability and global trends.



WHAT MATTERS MOST

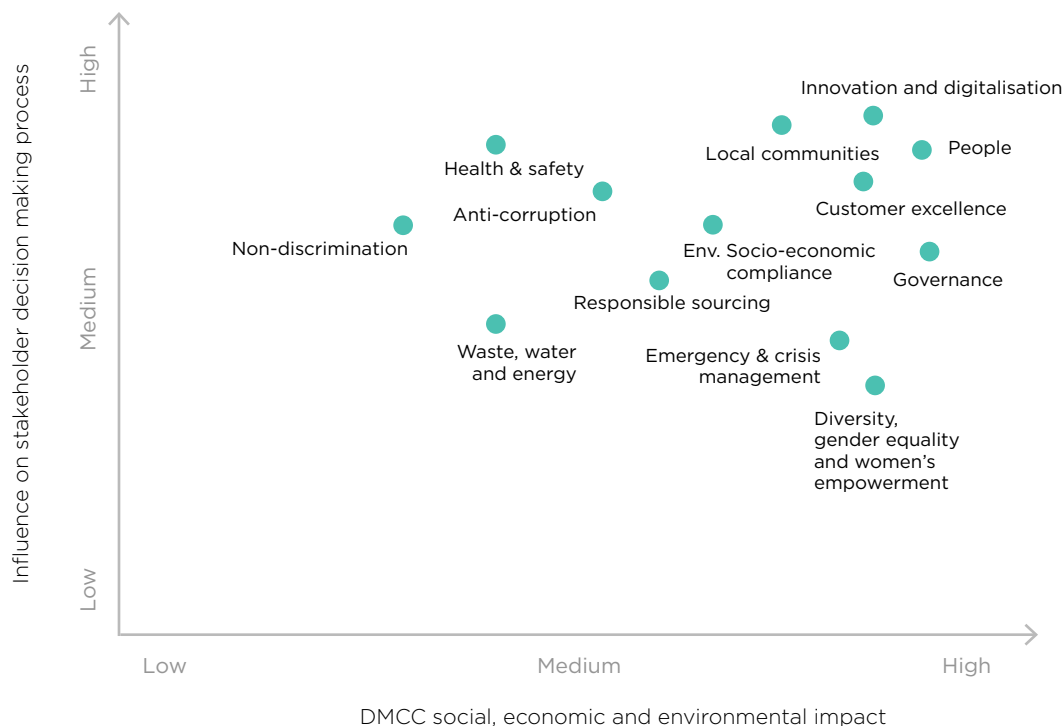
DMCC has identified the sustainability topics that are most material and relevant to its business.

Identifying material topics that are pertinent to DMCC and key stakeholders is a vital component of its sustainability strategy and reporting. As defined by the GRI Standards, material topics are those that reflect an organisation's significant economic, environmental and social impact and those that substantively influence the assessment and decisions of stakeholders.

DMCC's materiality assessment follows a systematic process that combines

insight and analysis from internal and external stakeholders and market trends. The sustainability topics critical to DMCC's business operations were identified through a rigorous materiality assessment exercise in the previous reporting cycle. The same material topics are considered for the 2018 reporting cycle to show progress on all commitments made during the previous year.

DMCC plans to re-engage with its internal and external stakeholders to re-assess and validate its sustainability material topics in 2019.



Key Material topics

SDGs

Topic boundary

Innovation and digitalisation



DMCC
customers and
services

People



DMCC employees

Customer excellence



DMCC customers
(e.g. member
companies)

Governance



Member companies,
suppliers and DMCC
employees

Anti-corruption



Member
companies and
suppliers

Environmental and
socio-economic
compliance



DMCC operations,
member
companies and
suppliers

Health and safety



DMCC employees
and areas of
operation

Key Material topics

SDGs

Topic boundary

Local communities and community engagement



DMCC employees and areas of operation

Responsible sourcing



Suppliers and members of certification initiatives

Diversity, gender equality and women's empowerment



DMCC employees and member companies

Emergency crisis and management



JLT community and DMCC employees

Non-discrimination



Member companies, suppliers and DMCC employees

Waste, water and energy



DMCC areas of operation





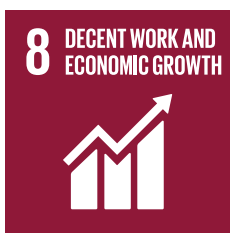
PEOPLE

PEOPLE

At DMCC, people are the most important asset. DMCC's Human Resources (HR) vision is to create a workplace that fosters a diverse and inclusive culture and supports high-performing employees' professional and personal growth.

DMCC continues to improve its work environment to support a high performing and innovative culture. Employees are provided with comprehensive career advancement schemes to grow professionally. In line with SDG Goal 8 – Decent Work and Economic Growth – DMCC's commitments to the UNGC and WEPs efforts continue towards protecting labour rights, driving women's empowerment and promoting local talent.

SDGs covered in this section



Alignment to the UNGC

HUMAN RIGHTS

Principle 1 *Businesses should support and respect the protection of internationally proclaimed human rights; and*

Principle 2 *make sure that they are not complicit in human rights abuses.*

LABOUR

Principle 3 *Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;*

Principle 4 *the elimination of all forms of forced and compulsory labour;*

Principle 5 *the effective abolition of child labour; and*

Principle 6 *the elimination of discrimination in respect of employment and occupation.*

Key objectives	Key achievements	Future objectives
Well-being programme	<ul style="list-style-type: none"> • Expansion of the well-being programme, conducted more than 15 awareness initiatives around mental, physical and financial health and well-being 	<ul style="list-style-type: none"> • Enhancement of health and well-being among employees and member companies • Conduct annual health programmes and checks
Diversity and inclusion	<ul style="list-style-type: none"> • 43 nationalities • 37% of female employees among permanent employees • 25% of females in DMCC Senior Management 	<ul style="list-style-type: none"> • Connect with organisations that would assist DMCC to hire people of determination or promote/assist with hiring among member companies; • Conduct WEPS gap analysis in line with the official tool • Enhance engagement with internal employees to better understand and fulfil their needs
Capacity building and employee engagement	<ul style="list-style-type: none"> • Development of 'Smart Skills Enhancement Programme' • 4,405 training hours delivered across all functional levels 	<ul style="list-style-type: none"> • Develop an e-learning web portal for employees • Increase the number of training hours per employee • Increase awareness of employees on sustainability
Emiratisation	<ul style="list-style-type: none"> • 23% of DMCC's executive and senior management are UAE nationals • 14% of the DMCC workforce are UAE nationals (2% increase in comparison to 2017) • five new UAE nationals enrolled in DMCC's Emirati Graduate Development Programme 	<ul style="list-style-type: none"> • Advance Emiratisation strategy • Support UAE nationals with career plans upon completing the DMCC Graduate Programme • Collaborate with local universities and develop an Emirati students' mentorship programme
Employee welfare	<ul style="list-style-type: none"> • A comprehensive Human Rights policy is under review 	<ul style="list-style-type: none"> • Development of and sign-off on a Human Rights policy in 2019 • Assess potential and actual human rights impacts • Develop and implement DMCC Human Rights Due Diligence Roadmap
Health and Safety	<ul style="list-style-type: none"> • Revised comprehensive health and safety guidelines complying with local legislation and requirements • Introduced an online mandatory training on H&S for employees • More than 1 million man-hours with zero Lost Time Injury (LTI), and zero fatalities 	<ul style="list-style-type: none"> • Increase awareness on H&S topics among member companies • Organise training sessions for employees on H&S standards • Maintain zero work-related injuries and fatalities • Complete 100% of towers fire risk assessments in JLT • Introduce a bi-monthly educational community campaign



“ At DMCC, we are committed to nurture and empower employees by strengthening their skills, and providing a safe and healthy working environment.

Feryal Ahmadi,
Chief Operating Officer,
DMCC

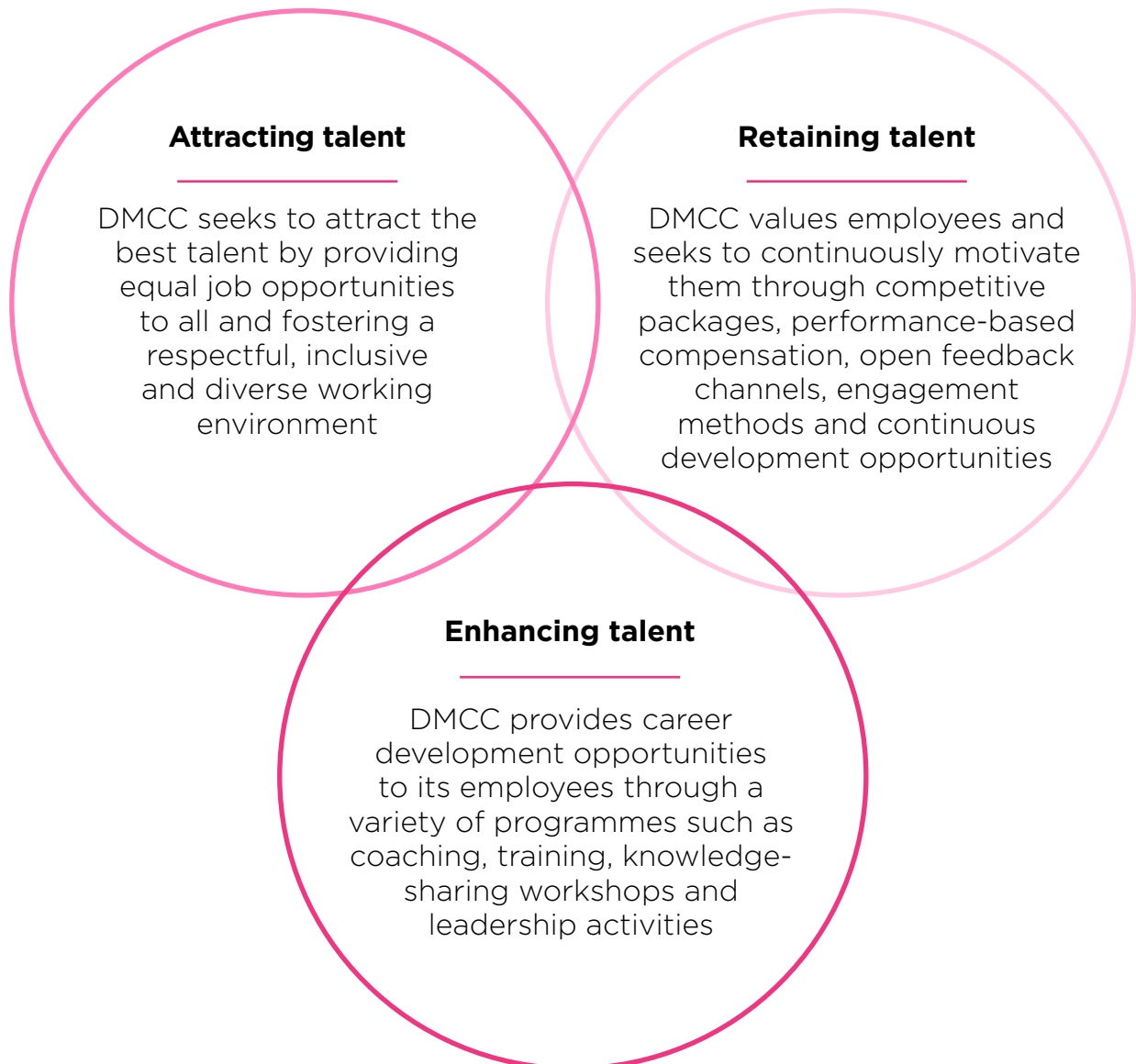
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WORKPLACE

The DMCC Code of Conduct is the guide for conducting business. It articulates DMCC's core values of accountability, honesty and reliability. All employees are responsible for knowing and following the ethical, legal and

policy requirements that apply to their jobs. Living by the Code of Conduct protects DMCC's reputation and promotes trust with customers.




Human Resources Vision



In 2018, DMCC's workforce was comprised of 82% permanent and 18% outsourced employees. Outsourced personnel are contracted for a variety of roles in departments such as the call centre, delivery services and the DMCC Tea Centre. DMCC contractual terms and conditions require

companies that supply DMCC with personnel to comply with UAE Labour Law. Outsourced employees obtain relevant soft and technical training to perform their responsibilities in an efficient manner and are encouraged to participate in employee engagement initiatives.

Employee profile

		2016	2017	2018
TOTAL NUMBER OF EMPLOYEES				
43 Nationalities				
				
GENDER	Male	248	265	243
	Female	140	154	141
PERMANENT EMPLOYEES		329	333	315
GENDER	Male	205	208	199
	Female	124	125	116
NATIONALITY	UAE Nationals	39	40	44
	Others	290	293	271
AGE GROUP	Under 30	75	55	52
	Between 30-50	238	260	244
	Over 50	16	18	19
OUTSOURCED EMPLOYEES		59	69	69
	Male	43	57	44
	Female	16	29	25

DMCC has ensured that its employees receive competitive and fair employment packages that are in line with the local industry standards. DMCC permanent employees receive a range of benefits as part of their employment package, many of which are above the UAE labour law requirements.

DMCC female employees are entitled to a paid maternal leave as per the UAE's labour regulations and are also eligible to daily nursing breaks for 18 months from the birth of the child. Male employees are eligible for three working days of paid paternal leave. In 2018, 95% of employees returned to work after taking their parental leaves.

Parental leave entitlement		2016	2017	2018
EMPLOYEES ENTITLED TO PARENTAL LEAVE		207	228	215
	Male	144	155	143
	Female	63	73	72
TOTAL NUMBER OF EMPLOYEES THAT AVAILED PARENTAL LEAVE		17	20	22
	Male	12	9	13
	Female	5	11	9
TOTAL NUMBER OF EMPLOYEES RETURNING TO WORK IN THE REPORTING PERIOD AFTER PARENTAL LEAVE ENDED		17	20	21
	Male	12	9	13
	Female	5	11	8



Employee hires and turnover

In 2018, the overall employee turnover rate for permanent employees was 17%, in comparison to 10% in 2017. This increase in turnover was due to organisational restructuring that aimed to optimise operational excellence and adapt to market requirements.²

DMCC conducts exit interviews for departing employees to understand the reasons behind their decision to leave. In addition, for employees leaving the organisation due to

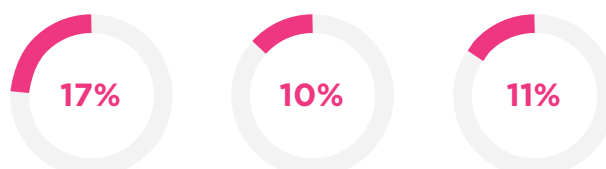
termination, DMCC supports them through the provision of various career-related advice and tools and assists them in finding new career opportunities through:

- Links to recruitment agencies that are strongly recommended by DMCC
- CV and LinkedIn counselling
- Consultations on job search and interviews

Employee hires and turnover

	2016	2017	2018
TOTAL NUMBER OF EMPLOYEE HIRES	56	36	36
Male	31	19	19
Female	25	17	17
Under 30	25	11	12
Between 30-50	30	22	22
Over 50	1	3	2

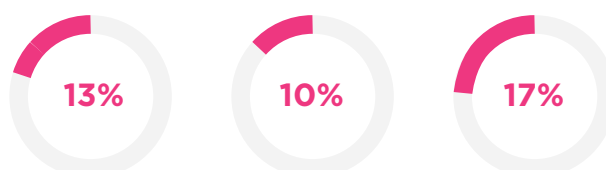
NEW HIRES RATE



TOTAL NUMBER OF EMPLOYEE DEPARTURE

	2016	2017	2018
TOTAL NUMBER OF EMPLOYEE DEPARTURE	44	32	54
Male	23	16	29
Female	21	16	25
Under 30	9	10	9
Between 30-50	27	19	39
Over 50	8	3	6

TURNOVER RATE



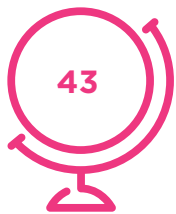
² DMCC defines its turnover as the number of employees that leave DMCC due to termination, change of jobs, change of country, or retirement divided by the total number of its permanent employees.

Embracing diversity and inclusion

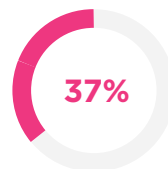
DMCC aims to attract more candidates with diverse abilities, backgrounds and experiences. Basing employment opportunities on competency and experience makes DMCC's recruitment policy inclusive and capable of attracting diverse and qualified candidates.

Diversity and inclusion are about creating an environment where employees feel safe, engaged and free to create and innovate.

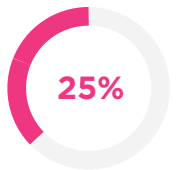
DMCC diversity metrics and achievements



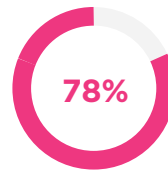
Employee nationalities



Of total workforce are female



Females in DMCC senior management



Of total permanent workforce aged between 30-50 years



DMCC signed the WEPS principles and became a member of the UAE WEPS taskforce

Promoting local employment

DMCC recognises the vital role of nationalisation in advancing the UAE's Vision 2021 objective to build a competitive, knowledge-based economy.

DMCC's recruitment policy endorses the UAE government's Emiratisation strategy by engaging with external Emirati candidates

at all levels for employment opportunities at DMCC; as well as granting preference for internal Emirati applicants for open vacancies and supporting them with training for a long succession plan. UAE nationals form the third-largest workforce group within DMCC, and DMCC is dedicated to maintaining a high Emirati representation in the future.



Attracting UAE Nationals



Internships and Work Placements

DMCC offers paid internships and work placement opportunities to UAE national students in colleges and universities as part of their curricula and graduation requirements.



Emirati Graduate Development Programme

The Emirati Graduate Development Programme aims to attract, develop and retain UAE national university graduates among DMCC's workforce. Annually, high potential graduate trainees are selected for the 12-month programme and are assigned to relevant business units based on their interests, skill sets and qualifications. During the programme, graduates receive training courses including accredited Leadership and Management courses, and their performance and technical competency are continuously assessed. Upon completion, candidates are given priority for suitable vacant roles within DMCC.

Nine UAE nationals who completed the programme in 2018 have assumed permanent roles at DMCC.

Five new UAE national graduates enrolled in the programme's second phase in July 2018.

Driving inclusion through engagement

DMCC provides an engaging work environment and aims at addressing employee concerns and incorporating employee suggestions in its decision-making process. Business updates and announcements are regularly communicated to employees via email, employee intranet, Yammer (enterprise social networking platform), and town hall meetings.

Furthermore, DMCC has established effective employee feedback and grievance redressal mechanism by:

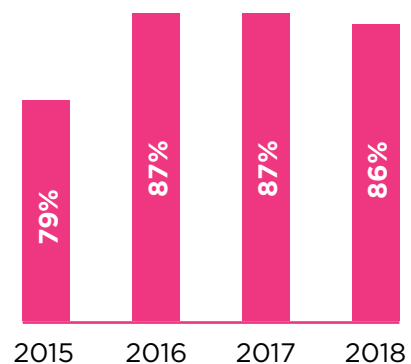
- Encouraging consistency, transparency and openness when handling workplace complaints and issues
- Following a clear process that leads to an effective settlement of concerns and grievances
- Allowing informal resolutions when appropriate, but following more formal proceedings when the circumstances demand

DMCC's key engagement methods with employees

Employee surveys

DMCC has gathered employee feedback on the performance of its HR function on an annual basis since 2012. DMCC considers employee surveys as tools used to gain insights and to measure employee engagement, and their satisfaction with the organisation's performance. Employees provide comments on DMCC's organisational structure, HR policies and procedures, recruitment and resourcing, benefits and rewards, career development and training and other criteria. In 2018, the satisfaction survey recorded a 90.5% response rate.

2018 HR performance satisfaction survey



Areas of strength: HR policies and procedures and operational support.

Areas of improvement: Career development and training; exploring innovative techniques instead of standard training sessions. HR is developing a new Competency Framework Dictionary, which will have a special focus on career advancement and training opportunities.



Employee recognition

The DMCC Employee Recognition Scheme is a communication tool that rewards employees who deliver outstanding results.

To encourage high performance, DMCC deploys employee recognition schemes, for small and large achievements, such as instant recognition toolkits and various awards for individuals and project teams throughout the year.

Employee well-being

DMCC is committed to helping improve employees' well-being and establish a work-life balance. In 2018, Human Resources expanded its well-being programme to include not only mental and physical well-being but also financial well-being.

To encourage employees to be more proactive about their health and safety, well-being initiatives were conducted throughout the year including:

- Corporate games
- Sponsorship of sports activities
- Motivational speaker sessions
- Breast cancer awareness sessions
- Ramadan with healthy choices
- Sleep awareness sessions

Furthermore, in 2018, the well-being programme incorporated financial wellness as part of its objectives on response to employees' previous feedback in the well-being survey. DMCC identified financial stress as one of the challenges faced by its employees. To address that, new awareness sessions and workshops on financial well-being were introduced. The sessions focused on the following topics:

- Improved relationship with money
- Increased spending awareness
- Creating a spending plan or a budget to solve financial problems
- Preventing future financial challenges
- Setting realistic financial goals
- Preparing for short-term, long-term and emergency financial needs





CULTIVATING EMPLOYEE TALENT

DMCC cultivates employee talent by linking individual employee objectives with the organisation's strategic objectives and targets.

DMCC's performance management process is an annual cycle, guided by HR's four core competencies for all employees – high-performance culture, market/customer orientation, professionalism and transparency. Regular discussions throughout the performance cycle are conducted, including coaching, mentoring, feedback and assessment.

The performance reviews assess employees' potential for promotion and help identify individual professional training and development needs. In 2018, 100% of DMCC's permanent employees received regular performance and career development reviews.

The development of a holistic competency framework was initiated by HR and is planned to be implemented by 2019. The framework will form the basis for an integrated approach, collating all HR-related processes under a single umbrella including selection, retention, development and career transitions for employees.

The Competency Framework Dictionary serves the following purpose:

- Aid with talent acquisition and selection processes
- Support employee growth and personal development
- Drive the identification and development of talent and performance-related interventions
- Support succession planning processes

Driving career progression at DMCC

In addition to traditional classroom training, DMCC provides learning and development opportunities to facilitate career development.

Training programmes

DMCC conducts multiple capacity-building and skill-based upscaling programmes for its employees. These include specialised training courses, mandatory training courses, seminars and workshops, sponsorships of degrees and membership in professional bodies.

Leadership development

DMCC enrolls employees from senior and middle management teams in a leadership development programme that is aligned to their business requirements and tailored to meet their leadership goals.

Coaching

DMCC promotes a culture of continuous learning. Employees receive on-the-job feedback and coaching on their tasks and responsibilities from their line managers to support them in their day-to-day responsibilities.

Transfers

Employees are eligible for transfers within DMCC if they meet the minimum job requirements, have completed 12 months in their current role and have approval from their line manager.

Job rotation

Employees can be rotated for a certain period from one department to another within the organisation. The rotation period (limited to six months) is followed by a performance review.

Succession planning

High-performing employees are identified as potential successors to fill critical positions and are provided with a detailed development plan to outline specific activities and training to develop the required competencies for those roles.

Employee training performance

		2016	2017	2018
ANNUAL AVERAGE HOURS OF TRAINING RECEIVED		26	37	14
GENDER	Male	23	34	14.2
	Female	32	41	14.4
EMPLOYEE CATEGORY				
Executive and Senior Management		39	80	12.6
Middle Management		35	79	17.9
All staff (professional, operational and administrative)		23	19	13.4

In 2018, DMCC continued to invest in training employees across all levels with a total of 4,405 training hours delivered. DMCC acknowledges the decrease in training hours compared to previous years and attributes the reduction to challenging business commitments, organisational restructuring, and lack of in-house training facilities. As a result, certain departments were unable to provide enough training opportunities for employees.

The DMCC Leadership Academy concluded its programme in 2018, where senior employees, supervisors and above, attended leadership training modules. The comprehensive leadership development programme comprises of diverse training methods: ongoing coaching, online courses, growth assignment projects, on-the-job activities, train-the-trainer sessions and instructor-led training. The central goal of the programme is to build important leadership competencies to increase DMCC's resilience and growth.



HUMAN RIGHTS

As a signatory of the UNGC, DMCC is committed to protecting human rights in its operations and to aligning its strategies with the UNGC principles on human rights.

DMCC safeguards its employees' human rights by aligning with the UAE Labour law and following a rigorous code of conduct. The DMCC Code of Conduct recognises the right of employees to have a respectful workplace that does not discriminate on the basis of race, colour, nationality, religion, gender, age, social and marital status or physical or mental disability. The DMCC corporate whistle-blowing policy and grievance procedures enable employees to file grievances and concerns without risk of reprisal; only in cases that require investigation will the employee's anonymity

be relieved solely for the purpose of the investigation. DMCC did not face any legal action or any recorded incident in relation to discrimination within the organisation during the reporting year.

As part of the DMCC human rights impact assessment roadmap, a new human rights policy aligned with UNGC labour and human rights principles will be drafted and issued in 2019. Understanding DMCC's human rights exposure and addressing potential human rights violations is an important responsibility.

DMCC HUMAN RIGHTS IMPACT ASSESSMENT NEXT STEPS:

- Formulating a human rights policy as DMCC's formal commitment to human rights
- Assessing potential human rights impacts as part of its risk assessment process
- Integrating findings from human rights risk assessment across functions and procedures
- Conducting awareness and training programmes to raise awareness on human rights among employees, suppliers, business partners and member companies
- Monitoring effectiveness of practices to manage DMCC human rights impacts and communicating on performance



HEALTH AND SAFETY

DMCC supports the Government of Dubai's vision to provide a safe and resilient built environment, and health and safety (H&S) remains a high priority for the organisation. DMCC's commitment to managing its H&S covers the organisation's permanent employees (over which DMCC has direct control) and extends to its contractors. DMCC also oversees compliance of sub-developers, the Master Community, member companies, towers and owners' associations with the relevant regulations and DMCC HSE Guidelines.

DMCC has maintained an excellent H&S record through the implementation of operational controls, standards and risk assessment procedures. In 2018, DMCC issued revised and comprehensive HSE Guidelines that comply fully with the local legislation and requirements, and also encompass global best practices. In addition, the organisation introduced a more formal H&S governance structure through the creation of an H&S working group, project meetings and regular stand-downs.

Establishing a strong health and safety culture

The DMCC Property department remains responsible for overseeing compliance with applicable legal requirements and the guidance specified in the DMCC's HSE Guidelines by contractors, sub-developers and member companies.

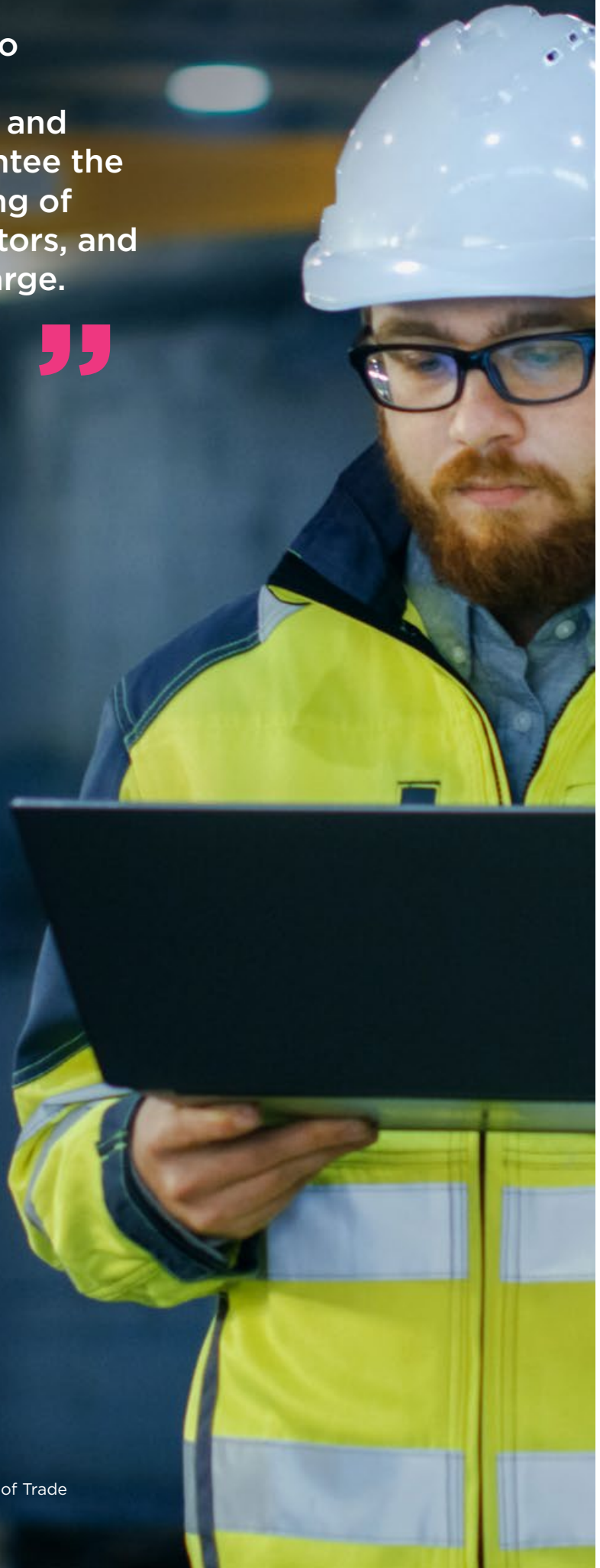
In 2018, two H&S working group meetings were conducted. The working group will continue to meet, as needed, to discuss DMCC's ongoing health and safety performance and areas of improvement.

“

At DMCC, we seek to constantly enhance processes, systems, and workflows to guarantee the safety and well-being of employees, contractors, and the community at large.

Paul Ashton,
Executive Director, Property,
DMCC

”





CASE STUDY:

Launch of the annual H&S seminar

In late 2018, DMCC hosted its inaugural H&S seminar for member companies in association with IOSH to share best practices and raise awareness of current H&S issues. Participants attended presentations from companies such as Electrolux and Seamaster Maritime, which shared their approaches to health and safety matters. Attendees learned about the latest in H&S in their sectors from fire safety and HSE legislation experts. DMCC plans to make this an annual event and continue to share knowledge for the wider benefit of all DMCC member companies and communities.



All new DMCC employees receive mandatory H&S training as part of the HR onboarding and induction process. The training covers the importance of H&S in the workplace and a review of relevant local laws and regulations. DMCC further introduced an online mandatory training programme on H&S aspects, including ergonomics training for all its employees. The training was rolled out to all employees and by the end of 2018, 89 employees successfully completed the training course and obtained certifications.

DMCC organised two fire warden training sessions in 2018. One of the sessions was conducted by the Emirates Civil Defence Academy as a one-day offsite training where

14 DMCC employees became certified as Fire Wardens. The second session was a Fire Warden re-fresher training, conducted by DMCC's Senior HSE Manager.

A dedicated HSE corner³ on DMCC's website aims to raise awareness among its stakeholders on health and safety issues such as fire risk, workplace noise, exposure to chemical elements, workplace accidents, conducting 'Control of Substances Hazardous to Health Regulations' (COSHH) assessments, first aid awareness and managing injuries.

³ <https://www.dmcc.ae/blog>

Protecting the wider community

DMCC adopts a comprehensive H&S approach to cover its contractors and sub-developers, the Master Community, member companies and towers and owners' associations.

Contractors and sub-developers

The HSE Guidelines offer a practical framework and implementation assistance to DMCC consultants and contractors who work within its boundaries. The H&S related inspections and checks are conducted by the DMCC Property department. Warnings and fines on any DMCC member company or sub-developer in relation to H&S violations are imposed through free zone regulations.

Zero H&S violations were recorded by DMCC contractors in 2018. Inspections led to six violation notices for sub-developers. These violations were attributed to non-conformance issues such as unauthorised waste dumping, repeat incidents of unsafe site conditions and traffic management issues.

Master Community

The H&S within the Master Community is administered by an assigned service provider. DMCC's H&S Guidelines encompass the mandatory working behaviours that must be followed to avoid and prevent any incidents arising out of unsafe work practices.

DMCC mandates that the Master Community administrator identifies the HSE hazards, risks and environmental concerns related to the Master Community operations. For the identified HSE concerns, mitigation measures and controls by the administrator shall be immediately adopted and continuously assessed through KPIs set by DMCC.

In the Master Community, more than 1,500 work permits were controlled and managed across the JLT district without any serious accidents, achieving a 60% reduction in workplace accident rates compared to 2017. In addition, the Master Community achieved a 100% compliance rate and received zero fines from the local regulatory authorities.

Retail shops

DMCC HSE Guidelines have a specific guideline for retail activities to ensure alignment with public health and safety requirements mandated by Dubai Municipality. Retail units are mandated to provide signage, follow first aid requirements, and comply with extraction and ventilation specifications as set out in applicable legislation, DMCC Rules and Regulations, and Dubai Municipality regulations.

In 2018, zero LTIs were recorded among retail units supported by the implementation of stringent H&S standards.

Free zone member companies

The DMCC HSE Guidelines require all member companies and employers within the DMCC free zone to establish and implement systems to manage H&S risks. DMCC aspires for its member companies to achieve a zero accidents record by implementing safe practices. DMCC monitors member companies' compliance with its rules and regulations through regular control checks.

Towers and Owners' Associations

Owners' Associations and their appointed Owner Association Managers and/or Facility Management companies are responsible for managing the H&S requirements within their respective towers.

According to UAE Federal Law No. (29) of 2006 concerning the rights of People of Determination⁴, owners, owners' associations and owners' association managers must perform risk assessments to determine the requirements for people of determination and prepare appropriate action.

The DMCC Property team works in close alignment with the towers' managers and requires the implementation of fire risk assessments of towers to maintain safe working conditions. A total of 57 fire drills were conducted across JLT towers in coordination with the towers' managers. All towers are required to conduct fire drills as per the Fire and Life safety code in 2019.

2018 health and safety performance

The boundary of this reporting cycle covers DMCC H&S performance for its permanent employees, contractors, sub-developers, the DMCC Coffee Centre⁵, the DMCC Tea Centre and the Master Community.

DMCC plans to initiate the implementation process of the ISO 45001 management system for its new Coffee Centre in 2018, making it one of the first commodity centres to have achieved and implemented this management system.



CASE STUDY:

Focus on fire and life safety

In 2018, DMCC placed considerable emphasis on the topics of fire safety and life safety. In addition to the introduction of fire risk assessments to all towers, DMCC upgraded the fire hydrants throughout the Master Community.

Introduced in 2018, the DMCC fire risk assessments make a standardised, methodical assessment of the towers' premises, the activities that take place in them and the likelihood of a fire breaking out. The risk assessment identifies issues by analysing fire safety procedures, fire prevention measures and fire precautions. The assessment determines the necessary precaution measures required in the event of a fire break out. The results of fire risk assessment are shared with the towers' owners, who must subsequently provide a prioritised Fire Action Plan to DMCC which is sent for review to the Dubai Civil Department. Once the fire risk assessments are completed for JLT towers, the programme will be rolled out to the Master Community.

⁴ <https://government.ae/en/information-and-services/social-affairs/special-needs>

⁵ Construction from 1 Jan 2018 to 31 October 2018 and operations from 1 November 2018 to 31 December 2018

DMCC conducted more than 500 HSE-related inspections to maintain safe practices throughout the vast array of business activities conducted in the DMCC free zone and the Master Community.

The H&S data management and collection mechanisms were enhanced in 2018. These improved data recording mechanisms will allow DMCC to implement effective corrective measures.

A slight increase was observed in minor fire-related incidents in the DMCC's Master Community landscape during 2018, and DMCC is assessing various preventive measures to be implemented to reduce this risk. In addition, as first responders, DMCC security guards were trained during 2018 to take up the responsibility to report fire incidents and to identify potentially hazardous situations.

H&S record of DMCC permanent employees⁶

	2017	2018
Number of total hours worked	564,000	683,974
Number of lost time injury	0	0
Lost time injury frequency	0	0
Work-related fatalities	0	0
Reportable incidents	4	1
Inspections	12	7

DMCC contractors and sub-developers H&S performance⁷

	2017	2018
Number of total hours worked	782,837	11,076,124
Number of lost time injury	0	0
Lost time injury frequency	0	0
Work-related fatalities	0	0
Incidents	29	77
Inspections	188	300
Violation notices	NA	6

⁶ DMCC permanent employees fall under our direct control.

⁷ Contractors and sub-developers (including those for the Uptown district) fall under our direct influence.

DMCC Master Community and retail H&S performance⁸

	2017	2018
Number of total hours worked	383,832	1,066,6870
Number of lost time injury	0	2
Lost time injury frequency	0	0
Work-related fatalities	0	0
Minor incidents	138	43
Major/serious incidents	0	0
Inspections	546	387
Violation notices	NA	2

DMCC Tea and Coffee Centre 2018 H&S performance⁹

Number of total hours worked	140,130
Number of lost time injury	0
Lost time injury frequency	0
Work-related fatalities	0
Incidents	0
Inspections	4

H&S continuous improvement

In 2019, DMCC will continue with its objective to protect the safety and well-being of all its stakeholders. The HSE team will be collecting H&S performance data on a monthly basis from contractors, sub-developers, industrial units in the free zone, Master Community and towers. DMCC will also increase the number of internal and external training and awareness sessions on H&S.



⁸ The Master Community managing agent falls under our direct influence.

⁹ This includes the health and safety aspects of the Tea and Coffee centre operations. The Coffee Centre's health and safety aspects during the construction phase are captured in the 'Other Project' statistics. The comparative data for 2017 is not available, as the Coffee Centre operations started in 2018.





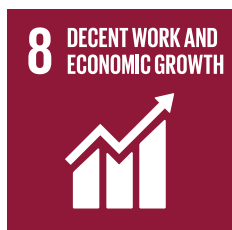
MARKETPLACE

MARKETPLACE

DMCC aspires to provide services that improve business conduct and create value for the local economy. DMCC contributes to the UAE 2021 National Agenda to transition the country to a knowledge-based economy by promoting innovation, encouraging economic diversification and supporting the growth of member companies and commodities trade.

The cornerstones of DMCC's marketplace strategy are governance, customer excellence, digitalisation and innovation, responsible sourcing and women empowerment. Operating responsibly means becoming a trusted business partner and corporate citizen for all stakeholders through fair business operations, innovative services and demonstration of international best practices.

SDGs covered in this section



Alignment to the UNGC

ANTI-CORRUPTION

Principle 10 *Businesses should work against corruption in all its forms, including extortion and bribery.*

“

We are dedicated to enhancing Dubai's position as a global trade gateway by establishing a thriving marketplace for commodities based on the highest standards of international compliance.

”

Sanjeev Dutta,
Executive Director, Commodities,
DMCC



Key objectives

Key achievements

Future objectives

Governance

- Conducted risk-focused training for departmental heads and risk champions
- DMCC Employment Regulations were updated, and guidance notes were produced
- Introduced new Master Community Regulations
- Launched the Employee Code of Conduct Policy as a standalone guidance
- Zero incidents in relation to customer data breaches

- Integrate sustainability into DMCC's governance structure
- Regularly review and update DMCC regulatory framework
- Integrate sustainability considerations into enterprise risk management
- Organise training sessions on new Employment Regulations in 2019

Customer excellence

- Recorded an overall customer satisfaction rating of 89%
- Established a pool of VAT clinics that provide advice to member companies free of charge
- Introduced new value-added services - internship packages, business apps manager platform and free zone company will
- Organised more than 50 events for customers, which were attended by more than 4,000 participants

- Continue providing world class services to customers by leveraging technology and digitalisation
- Continue implementing improvements based on member companies' satisfaction surveys

Sustainability awareness

- Integrated sustainability-related topics as part of DMCC's outreach industry events
- Organised six events related to sustainability topics

- Promote the SDGs and sustainability among DMCC external stakeholders
- Incorporate sustainability content in communications, events and other marketing materials produced by DMCC

Innovation and digitalisation

- Launched DMCC Coffee Centre
- 95% of services for member companies are accessible online
- Shortened delivery time for several online services
- Launched Nook, a health-focused entrepreneurial co-working space

- Establish an R&D department that operates across the whole organisation
- Develop and implement a strategy aimed at supporting start-ups within the free zone
- Develop and implement the Business Intelligence platform

Key objectives	Key achievements	Future objectives
Responsible sourcing	<ul style="list-style-type: none"> • Addressed improvement opportunities identified by the Organisation for Economic Co-operation and Development (OECD) Alignment Assessment 	<ul style="list-style-type: none"> • Launch the MyKYCBank¹⁰ platform • Conduct training sessions on Anti Money Laundering/ Combating the Financing of Terrorism, Ultimate Beneficial Owner and Suspicious Transaction Reporting
Women empowerment	<ul style="list-style-type: none"> • Signatory of WEPs principles since March 2018 • Conducted WEPs assessment • Implemented female-targeted initiatives as part of the well-being programme, such as breast cancer awareness campaigns • Hosted and participated in knowledge sharing and networking opportunities for women such as SheTrades events 	<ul style="list-style-type: none"> • Launch a platform/programme to support women's participation in leadership and trade • Continue to support the Outreach WEPs Taskforce in the UAE • Continue offering WEPs awareness session

¹⁰ MyKYCBank is an initiative that was set up by GJEPC (Gem & Jewellery Export Promotion Council). Through this platform, companies can simplify their Know Your Customer assessment.

GOVERNANCE

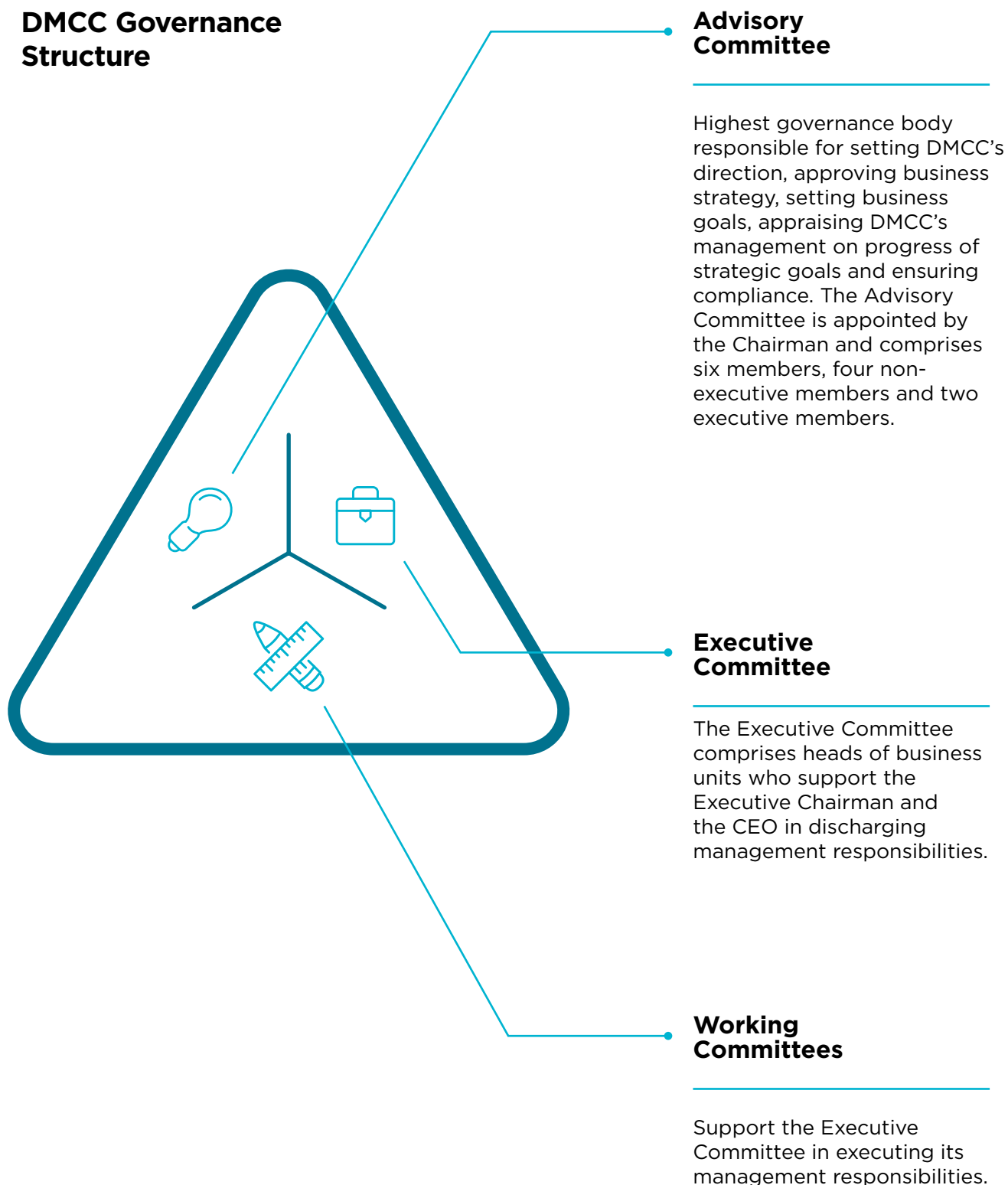
As a globally leading free zone, DMCC has a robust governance structure with a mandate to conduct its business activities in an accountable, honest and transparent way. DMCC fully complies with external regulatory standards and embraces global best practices by voluntarily supporting worldwide initiatives such as the SDGs, OECD guidelines and the Financial Action Task Force (FATF)¹¹.

DMCC's governance framework is comprised of policies, procedures, a risk management framework and effective internal controls that allow it to achieve its objectives in a dynamic business environment.

DMCC's governance management is driven from the most senior levels, with an Advisory Committee that works closely with an Executive Committee, which is further supported by Working Committees that have a particular area of governance focus.

¹¹ The Financial Action Task Force (FATF) is an intergovernmental body that supports the implementation of measures to prevent anti-ethical use of financial systems, such as money laundering and terrorism financing.

DMCC Governance Structure



Managing risk

The organisation's Enterprise Risk Management (ERM) framework assesses DMCC's business risks and identifies mitigating factors or activities that can reduce or minimise the identified risks. A Control Self-Assessment policy determines the efficiency of controls in mitigating risks, and a risk register is maintained at both the corporate and department level.

DMCC's ERM Framework is aligned with the recommendations of the COSO¹² Framework and follows its 8 elements that interact to support DMCC business activities.

Through DMCC's ERM, the process of risk identification follows top-down (Executive Committee and the Governance and Risk Committee) as well as bottom-up (departments' heads and key employees) approaches. DMCC manages its systematic risks that may affect not only its activities but also the activities of its member companies and other stakeholders. These risks include:

Fraud	Cyber	Security	Public
<ul style="list-style-type: none"> • Forgery and theft • Financial • Corruption and bribery • Regulatory breach • Money laundering • Procurement • Collusion • Tax crime 	<ul style="list-style-type: none"> • Virus • Phishing • Data breach • Data loss • Stolen equipment • Lost equipment • Ransomware • Wire transfer • Service disruption and loss 	<ul style="list-style-type: none"> • Physical theft • Workplace violence • Geopolitical events • Terrorism 	<ul style="list-style-type: none"> • Environmental • Health and safety • Employment rights

¹² The Committee of Sponsoring Organisations of the Treadway Commission (COSO) is a joint initiative of private sector organisations and is dedicated to providing thought leadership through the development of frameworks and guidance on enterprise risk management, internal control and fraud deterrence.

In 2018, DMCC built on its existing mitigation plans and introduced new measures for its sustainability-related risks.

Key risks identified in 2018	Mitigation measures
Underachievement of Emiratisation target	<ul style="list-style-type: none"> • Five-year Emiratisation strategy and DMCC Graduate Training programme and internship programme • Year-on-year increase in UAE Nationals representation out of the total workforce
Master community hazards (fire, HSE and security incidents)	<ul style="list-style-type: none"> • Establishment of a new Master Community Declaration and Community Rules • DMCC HSE guidelines applicable to suppliers (contractors and sub-developers), member companies and tower owners • Introduction of a fire risk assessment programme • Centralisation of Security Central Command Centre and enhanced incident reporting mechanism
Absence of smart integrated infrastructure	<ul style="list-style-type: none"> • Master Community assets were captured digitally within Asset Management platform • DMCC Smart and Sustainable District Strategy progress in 2018: <ul style="list-style-type: none"> - Creating a central platform that stores, analyses and visualises Smart & Sustainable District data - Digitising infrastructure assets both physical and ICT based - Smart parking project
Member companies' non-adherence to rules and regulations impacting DMCC's reputation	<ul style="list-style-type: none"> • Revision of company, employment and Master Community regulations for clear guidance on roles and responsibilities • Compliance policy with preventive and proactive measures. Rules and regulations permit de-licensing of any non-compliant company
Cyber security	<ul style="list-style-type: none"> • Annual Vulnerability Assessment and Penetration Testing (VAPT) to ensure the security of DMCC's cyber systems • Periodic user awareness campaigns to protect users and their information • Cloud services to protect the interests of DMCC

Policies for controls and compliance

DMCC strives to assess and manage compliance risks of DMCC, DMCC membership-based businesses and free zone member companies.

DMCC's compliance efforts are guided by a compliance risks assessment. In 2017, DMCC issued a Fraud Control Policy and completed a Fraud Risk Assessment. At the organisational level, compliance is assured through internal and external audits. Internal audit teams work independently to ensure independence and report directly to the Advisory Committee.

A testament to the effectiveness of the adopted compliance and anti-corruption practices, DMCC did not face any reported incidents of corruption nor did it suffer any legal action or fine for non-compliance with social and economic laws or regulations in 2018.

DMCC regularly reviews and updates its regulatory framework to reflect the dynamic nature of its business.

Updates on the DMCC regulatory framework during 2018

	Key changes	Status
Company Regulations for member companies <i>Completely re-written</i>	<ul style="list-style-type: none"> • Clearer guidance on enrolment as a member company in the DMCC free zone, and the corresponding obligations. • Increased clarity for member companies on their roles and responsibilities toward DMCC. • Improved readability and accessibility. 	<ul style="list-style-type: none"> • Pending approval and expected to be launched in the first quarter of 2019. • Training sessions and associated guidance notes are planned to support the launch.
Employment Regulations <i>Reviewed and updated</i>	<ul style="list-style-type: none"> • Further guidance to DMCC member companies and their employees on UAE Labour Law for topics like disciplinary issues, flexible working, visa cancellation and others. 	<ul style="list-style-type: none"> • In 2019, DMCC's legal firm will run training sessions on the new Employment Regulations and associated guidance notes.
Master Community Regulations <i>Improved and modernised</i>	<ul style="list-style-type: none"> • An extensive update to the Master Community declaration detailing the responsibilities of DMCCA¹³ which oversees the Master Community. Introduced new Master Community Regulations containing legal governance and control mechanisms required for the operation of the Master Community. 	<ul style="list-style-type: none"> • The establishment of a new Master Community Declaration was completed. The document defines the governance and management structure for the Master Community, which now outlines the operational requirements and rules for all stakeholders.

¹³ Dubai Multi Commodities Centre Authority

Ensuring compliance with laws and regulations

During 2018, DMCC launched the Employee Code of Conduct Policy as a standalone guidance, and made it available to all employees through the company intranet site.

Disciplinary related issues identified or raised by any employee are firmly dealt with at DMCC. All decisions are taken in adherence with DMCC's HR policies and the UAE Labour Law. In 2018, 9 disciplinary cases were identified against issues such as non-compliance with HR policies, performance-related concerns and inducing material loss for the organisation. The disciplinary case which resulted in a material loss for the organisation was thoroughly investigated, and a dismissal decision was made by the HR Committee as per Article 120 of Labour Law and DMCC's HR policy.



CASE STUDY:

DMCC Disputes Centre – mediation services for member companies

In direct response to feedback from member companies, the DMCC Disputes Centre was created in 2017 equipped with a dedicated team of professionals to assist the resolution of disputes.

An average of more than 500 individuals consulted the DMCC Disputes Centre each month. In 2018, the Centre handled almost 350 workplace mediations with a settlement rate of 73% and a customer satisfaction rate of 96%. The Centre established an agreement with accredited mediators such as the Royal Institution of Chartered Surveyors (RICS) to

assist in complex commercial mediation cases. In addition, the Centre has partnered with key providers of legal services to offer DMCC member companies and their employees access to pro bono (free of charge) legal advice through the Legal Clinics initiative. Legal clinics were launched in 2017 covering 6 key areas: corporate, commercial, disputes, employment, intellectual property and real estate. The employment clinics have been the most attended by member companies and their employees to date. The Legal Clinics offering was further expanded in 2018 with the on-boarding of additional law firms.

As part of the process of becoming a DMCC registered and licenced company, a screening phase is being enforced for all applicants - more than 35,000 screenings were completed in 2018. In 2019, this process will be improved through the launch of an automated in-house platform. DMCC's Controls and Assurance team undertakes regular inspections of member companies and those found in breach of free zone policies and procedures may be issued with violation notices, fined or even terminated. Inspections cover Operational Readiness Inspection (ORI), automated inspections of licence validity and physical inspections of retail outlets. In 2018, around 7,000 inspections of DMCC member companies took place, resulting in 710 warnings and 31 fines.

In addition to the screening and inspection procedures, DMCC has implemented the Approved Auditor Rules for member companies, in relation to the mandatory submission of annual audited financial statements. The guidelines include a list of approved auditors and the procedure to approve and renew auditing firms, as well as a description of the panel in charge of assessing firms and their sample audits.

Supporting the UAE's government efforts on anti-corruption

DMCC has a zero-tolerance policy towards any form of corruption and is committed to supporting UNGC Principle 10 on Anti-Corruption. In support of the UAE government's efforts to drive Anti Money Laundering and Combating Financial Terrorism (AML/CFT) best practices, DMCC is assisting with the preparations for the Financial Action Task Force (FATF) assessment scheduled for 2019. Established in 1989 by the G7 summit, the FATF aims to establish global norms and standards of legal, regulatory and operational measures to fight against threats to the security and integrity of the international financial system.

During 2018, DMCC attended six workshops as part of the UAE's FATF assessment preparation. DMCC Compliance, and Government and Legal Affairs representatives provided input on AML/CFT threats, emerging risks in the UAE, free zones laws and regulations current compliance status against the FATF recommendations. In December 2018, the UAE issued a revised AML/CFT law in accordance with the FATF requirements. In response to the revised law, DMCC will review and amend its AML/CFT, Ultimate Beneficial Owner (UBO) and Suspicious Transaction Reporting (STR) rules.

Protecting privacy and ensuring information security

The protection of information and data of member companies and other customers is central to DMCC's commitment to building trusted relationships. To prevent data breaches from occurring, DMCC performs regular internal and external audits. In 2018, DMCC had no incidents of customer data breaches.

DMCC conforms to the Information Security Regulation (ISR) that is issued by the Dubai Electronic Security Centre. It regularly conducts control checks to assess compliance and identify areas for improvement. In 2018, DMCC worked on closing the initial gaps highlighted as partially compliant in 2017.

In 2018, data processing activities were analysed across DMCC's function to identify the missing parameters to comply with the European General Data Protection Regulation (GDPR) 2016/679. The GDPR is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection. As a result, DMCC issued a revised Privacy Policy which was released in May 2018. The Data Protection Policy and Data Breach Response Plan will be binding in DMCC's 2019 contractual agreements. After the release of these policies, DMCC will introduce online training for employees on the Data Protection Policy.

CUSTOMER EXCELLENCE

The customer is at the heart of DMCC's business model, which facilitates the success of member companies' operations by supplying an innovative business environment with cutting-edge service support.

Each year DMCC introduces new platforms, services, networking opportunities and educational programmes to its palette of customer offerings. This approach has earned DMCC the title of 'Free Zone of the Year' for the fourth year running, as awarded by the Financial Times fDi magazine.

Some of the customer-driven, business development initiatives introduced in 2018 included: establishing a pool of VAT consultants who provide clinics and advice to member companies free of charge; hosting welcome breakfasts for new members to ease their establishment into the free zone; automated visa services; expansion of Astrolabs technical incubator hub; call centre upgrade; streamlined payment processes; a new help centre; and an enhanced licence renewal process.

“

Every day at DMCC we try to make the customer experience a little bit better. We engage closely with our member companies to respond to their needs.

”

Ahmad Hamza, Executive Director, Free Zone, DMCC

Driving customer engagement

DMCC operates in a diversified, highly competitive and dynamic global business landscape. This necessitates the development of a strong customer-focused approach to create a vibrant business environment for various industries.

Engaging with customers allows DMCC to create an edge for itself in the market by responding to customer needs effectively. In 2018, DMCC organised more than 50 events addressed to its customers, which were attended by more than 4,000 participants. The events spanned across a range of current pressing business topics, including employment law training, data protection regulations, risk management, gender equality, SDGs, AML, company set-up requirements, VAT regulations and community H&S.



CASE STUDY:

Beyond Bitcoin: Blockchain in the Energy Sector

In April 2018, DMCC Energy Club hosted a workshop for the member companies on blockchain in the energy sector. The workshop speakers were from DGCX, Thomson Reuters and other specialists from the energy and technology sector.

The session explored the different applications of blockchain technology across the energy sector and the key legal and practical considerations for implementation. The case studies provided practical learning and triggered a discussion on blockchain challenges in the current market landscape. The event was attended by 36 participants with a 100% satisfaction rate.



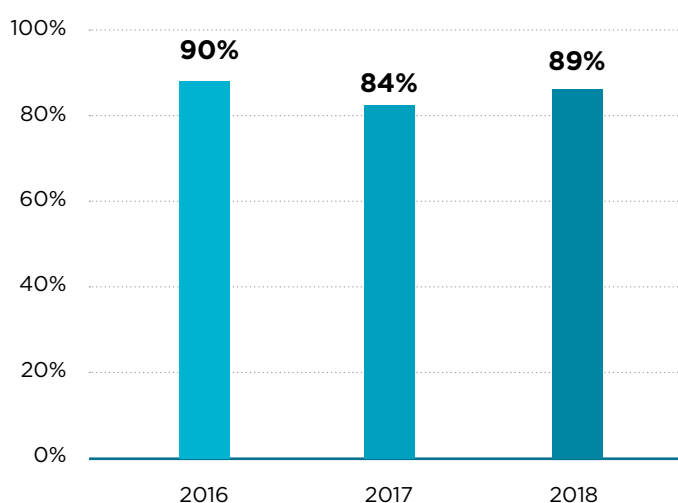
Customer feedback

In its seventh annual survey in 2018, DMCC recorded an overall customer satisfaction rating of 89%. There were 944 companies that provided feedback on DMCC's services, of which 71 were key accounts.

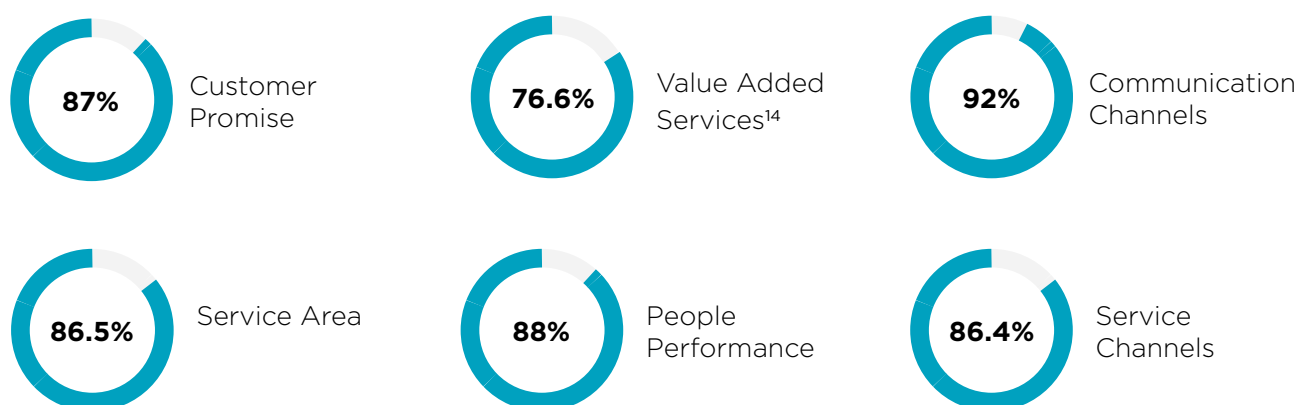
Key insights from the survey include:

- The overall customer promise score increased to 89% in 2018 from 84% in 2017
- Key customer satisfaction metrics such as 'overall satisfaction', 'loyalty improvement', 'willingness to expand' increased by 5%, 2% and 3% respectively, compared to 2017 scores
- In terms of people performance, a high satisfaction rate was recorded for DMCC's customer service facing employees. In addition, 'empowering staff for decision-making' was identified as an area of improvement

Overall satisfaction



Member company satisfaction on specific topics for 2018



¹⁴ This satisfaction rate is for the existing package of value-added services provided by DMCC. DMCC introduced some new value-added services in 2018, which include the VAT clinic service, internship packages, business apps platform and free one company will. These new services were surveyed during the annual satisfaction survey and an overall satisfaction score of 83% was recorded.

INNOVATION

Aligned with the SDG 9 - Industrial Innovation and Infrastructure and with the UAE Vision 2021, DMCC considers innovation as an enabler for progress and a catalyst for its global. As part of a dynamic community, DMCC has a responsibility to constantly evolve itself to offer relevant and high-quality services to foster global trade.



Innovation is a catalyst for growth. One exciting new innovation initiative that was launched in 2018, was the DMCC Coffee Centre which will bring new trade flows to Dubai



Franco Bosoni, Director, Innovation Hub, DMCC

Driving innovation

The DMCC Innovation Hub has been key to encourage and channel creativity within the organisation. With an innovative approach to marketplace creation, the Innovation Hub calls for ideas on technology products and services that allow for new physical and financial spaces for global commodities trade.

Since its launch in 2017, the Innovation Hub has served as a platform for the development and deployment of ambitious projects such as the DMCC Coffee Centre, which became operational during 2018.

With a 2019 launch date, the Dubai Design Academy is targeted at the jewellery industry. Offering accredited training programmes with a focus on pioneering design and manufacture, the Academy will serve as a launch pad for jewellery start-ups to grow their businesses. The Academy has ambitions to elevate the status of the UAE as a global jewellery brand creator. These projects demonstrate DMCC's creative and entrepreneurial spirit as an essential ingredient for the achievement of its strategic objectives and growth of the local economy.

Digitalisation – an enabler of excellence

Many of the digital improvements introduced by DMCC each year are responses to stakeholder needs. In 2018, the delivery time for issuing an e-licence to operate within the DMCC free zone was shortened, and now within 5 days of signing and submitting all the relevant documentation, the e-licence is issued via the new digital solution.

A commonly used tool by DMCC's member companies is the Discussion Forum, which is designed to submit queries and access information from other discussions on similar topics. For private or specific inquiries, members can reach out electronically to the DMCC Help Centre to obtain a personalised answer.

DMCC is in the process of integrating new digital initiatives under the Business Intelligence¹⁵ project. The aim is to harness digital advancements such as blockchain and artificial intelligence in a consolidated manner and efficiently interpret business information.



¹⁵ Business intelligence comprises the strategies and technologies used by enterprises for the data analysis of business information.



Encouraging entrepreneurship

Entrepreneurship is the foundation of innovation. In support of the UAE National Innovation Strategy, DMCC seeks to continuously create an enabling entrepreneurial landscape for its small businesses and start-up member companies.

AstroLabs, in partnership with Google and IBM, is a tech hub that provides unique co-working space for high potential digital companies. AstroLabs Academy hosts international tech entrepreneurs and delivers a variety of classes on digital skills and solutions. During 2018, AstroLabs held more than 150 technology and entrepreneurship events and connected more than 100 member start-ups with the global market.

Similarly, Nook, DMCC's health-focused co-working space, was launched in 2018 as a platform for sports, fitness and wellness entrepreneurs to work in a collaborative space surrounded by more than 200 likeminded businesses and professionals. In addition to the value-adding benefits provided by DMCC's co-working spaces, such as high-speed wireless Internet connection and printing and business support services, Nook offers access to wellness studios and gym facilities, and free admission to its community events.

DMCC commits to continually support the development of entrepreneurs and start-ups in the region by creating an enabling business environment for SMEs and innovators.

RESPONSIBLE SOURCING

Responsible sourcing is at the core of trade

Modern commodities supply chains are highly complex, multi-tiered networks that consist of evolving relationships between individual suppliers from around the world. Globalisation and shifting patterns of trade can quickly create new risk hot spots, making improving standards at scale more challenging. By understanding where these risk hot spots are, organisations can proactively improve their supply chains in relation to the wide array of environmental, social and ethical factors.

DMCC is committed to addressing supply chain risks by monitoring responsible sourcing practices. While the social, ethical and environmental impact of the operations of its member companies lies outside DMCC's direct control, DMCC plays its role by promoting responsible sourcing practices.

DMCC recognises the growing expectations of stakeholders and the rise in supply chain compliance requirements locally and globally. DMCC is one of the 6 members of the OECD's Multi Steering Group for responsible supply chains for minerals. In addition, DMCC leads the Kimberley Process Certification Scheme in the UAE – a joint government, industry and civil society initiative to stop the flow and trade of conflict diamonds.

DMCC is committed to advancing responsible sourcing practices through:

- Ongoing analysis of risks and opportunities
- Education and awareness
- Capacity building with industry networks
- Assurance and accountability by member companies
- Implementing a robust and balanced regulatory framework

“ We are aware of our instrumental role in ensuring that Dubai remains at the forefront of the global trade of precious metals and diamonds. We have established and continue to improve responsible sourcing frameworks by partnering with industry leaders like the OECD and Responsible Jewellery Council (RJC). ”

Maryam Al Hashemi,
Director, Precious Metals & Stones
DMCC

Alignment assessment of industry programmes with the OECD minerals guidance¹⁶

The OECD Guidance¹⁷ outlines detailed requirements to be followed by companies engaged with minerals or metals trade from conflict-affected and high-risk areas. The OECD Guidance follows a 5-step framework, which supports organisations to manage their supply chain in a transparent manner.

After the initial assessment of DMCC's programmes in 2016 against the detailed recommendations of the OECD Guidance, the programmes were updated and reassessed in 2018, with the recommendations integrated into DMCC's programmes. The Terms of Reference and strategic objectives for the Independent Governance Committee (IGC) were revised and approved in 2018.¹⁸

The 2018 assessment against the OECD Guidance highlighted DMCC's strong engagement on responsible sourcing with gold traders and government authorities in

the UAE, and with producers and exporters in higher risk countries. The Independent Governance Committee was recognised as a robust mechanism for DMCC's transparency and independence.

The key areas of improvement identified by the assessment in 2018 include:

- Enhancing the vetting and capacity building of auditors to strengthen audit consistency and rigour
- Clarification to DMCC refiners and auditors that on-the-ground risk assessments should always be undertaken on red-flagged supply chains
- Increased transparency on disclosing the supply-chain risk management and performance of accredited refiners

¹⁶ <http://mneguidelines.oecd.org/Alignment-assessment-of-industry-programmes-with-the-OECD-mineral-guidance.pdf>

¹⁷ OECD Guidance refers to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

¹⁸ https://www.dmcc.ae/application/files/5915/4098/1432/IGC_Annual_Report_2018_-_final.pdf



CASE STUDY:

DMCC hosted the 7th Dubai Precious Metals Conference

DMCC hosted the 7th edition of its industry-leading annual Dubai Precious Metals Conference (DPMC) in April 2018. The conference aimed at providing a fresh global outlook on the precious metals sector and was targeted towards the entire value chain – from mines to jewellers.

The topics of discussion included the evolution and impact of taxations on gold, expectations and reality of responsible sourcing practices, the role and future of global exchanges and the pressing challenges in the precious metals sector.

DMCC will continue to conduct industry events to build capacity and educate stakeholders in both the upstream and downstream precious metals sectors.

DMCC's internal sourcing

DMCC's internal procurement policy requires that all DMCC procurement activity is conducted in a fair and transparent manner. Suppliers are chosen based on their ability to create the best value in terms of cost, quality and their ability to comply with legal and best practices requirements.

DMCC contracts bind all third-party suppliers to be compliant to the UAE law and DMCC's rules and regulations covering anti-corruption, HSE and labour law.

Supporting SMEs and local companies in the UAE increases DMCC's contribution to the local GDP. When procuring any goods or services, the first choice is always a local supplier, provided they meet all technical, commercial and legal qualifications. In 2018, 94% of the total procurement budget was spent on local suppliers¹⁹ in comparison to 88% in 2017.



¹⁹ DMCC defines local suppliers as companies that are registered in the UAE. DMCC's significant location of operation is to be considered as UAE. The proportion of local procurement is based on processed payments.



WOMEN'S EMPOWERMENT

As a signatory of WEPs since March of 2018, DMCC actively adopts initiatives consistent with the WEPs seven principles to drive gender equality. Research shows that larger economic gains can be reached by having more women in the workforce. To facilitate women's role in trade, DMCC is establishing a platform to support women in overcoming existing market barriers and to increase women's participation in leadership and trade. The programme is expected to launch in 2019.

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During 2018, the proportion of women among the workforce grew to 38.5%, with a 25% representation in governance bodies. Closing the gender inequity among leadership positions will drive better business results. DMCC plans to develop and implement a corporate-wide gender-balanced policy applicable to DMCC's hiring strategy, training and development, leadership programmes and compensation. In addition, DMCC will collaborate with its member companies to establish a mentorship programme for high potential female employees and entrepreneurs creating an attractive business environment for women in the free zone.





ENVIRONMENTAL STEWARDSHIP

ENVIRONMENTAL STEWARDSHIP

As an environmentally responsible organisation, DMCC is committed to minimising its environmental footprint. DMCC is in the process of establishing and implementing a streamlined data management system for energy, water and waste across its operations to improve natural resource use efficiencies.

DMCC released revised HSE Guidelines in 2018, setting out the environmental requirements for all its contractors, sub-developers, owners' associations and member companies. The purpose of the HSE policy is to promote a proactive approach to reducing environmental impacts.

SDGs covered in this section



Alignment to the UNGC

ENVIRONMENT

Principle 7 *Businesses should support a precautionary approach to environmental challenges*

Principle 8 *Undertake initiatives to promote greater environmental responsibility*

Principle 9 *Encourage the development and diffusion of environmentally friendly technologies*

Key objectives	Key achievements	Future objectives
Energy efficiency	<ul style="list-style-type: none"> Introduced energy reduction initiatives via retrofitting interventions on OneJLT building Registered OneJLT with USGBC²⁰ ARC platform Uptown Dubai is being constructed in accordance with LEED Gold (BD+C) standards 	<ul style="list-style-type: none"> Conduct an audit of all DMCC assets on water consumption to improve the data and statistics Develop a strategy focused on the improvement of consumption efficiency based on the audit Automate data collection and monitor changes in energy consumption
Water preservation	<ul style="list-style-type: none"> Implemented smart initiatives to improve the water quality of JLT Lakes Transitioned to chemicals-free maintenance regime for the lakes Conducted initial workshops and briefing sessions to develop a landscaping master plan 	<ul style="list-style-type: none"> Initiate monitoring of the water quality by 2019 Conduct an audit of all DMCC assets on water consumption to improve the data and statistics Develop a strategy focused on the improvement of consumption efficiency based on the audit Automate data collection and monitor changes in water consumption
Waste management	<ul style="list-style-type: none"> Initiated recycling of paper, can, plastic and batteries across the Master Community 	<ul style="list-style-type: none"> Establish a reporting system for waste generation and separation Conduct an audit of all DMCC assets on waste management to improve the data and statistics Engage with restaurants and hotels in JLT to facilitate the implementation of recycling Develop a strategy focused on the improvement of consumption efficiency based on the audit Automate data collection and monitor changes in waste management

²⁰ United States Green Building Council

DMCC HSE Guidelines 2018

The revised 2018 HSE Guidelines mandate environmental compliance requirements for not only DMCC and its member companies, but also for contractors, sub-developers, owners' associations, facility management companies and tenants.

The comprehensive Guidelines outline the environmental protection requirements and monitoring of environmental impact including atmospheric pollution levels, water emissions, noise and vibrations, energy and waste management. DMCC requires all employers, owners or owners' representatives to submit an environmental plan that details both their environmental impact and preventative measures. The plan should be developed in line with applicable environmental laws and the requirements of the DMCC HSE Guidelines.

The Guidelines specify green building regulations that apply to all new buildings, extensions or refurbishment of the existing property. The regulations cover ecology, planning, building vitality, energy, water and waste dimensions. New building projects must conduct an Environmental Impact Assessment (EIA) and require a building permit that is issued by DMCC. Contractors and sub-developers working on

DMCC development projects fall within its direct sphere of influence. They are required to monitor and report on environmental indicators including noise pollution, air pollution, water discharges, effluent and spills, energy consumption and waste generation.

To ensure that environmental risks are well-managed, DMCC conducts regular environmental inspections on construction sites, towers and the Master Community. The inspections assess compliance with DMCC HSE Guidelines, Local Order No (61) issued by Dubai Municipality, and UAE Federal Law No (24) of 1999 for the protection and development of the environment. If DMCC identifies non-compliance from any concerned party, a formal warning is initiated which can result in an improvement notice, prohibition from work notice, potential fines for serious breaches and termination of license or contractor in extreme situations.

In 2018, DMCC issued warning notices to sub-developers breaching the HSE Guidelines in regards to noise levels, and a financial penalty was raised for a concrete spill incident. By closely reviewing performance against the HSE Guidelines, DMCC can sustain continuous improvement towards a better environment.

Smart Environment

Launched in 2018, DMCC's Smart and Sustainable District strategy has the environment integrated into its goals and forms a dedicated theme for DMCC's environmental objectives. Under the Smart Environment theme, DMCC puts a strong focus on developing new projects and properties with lower environmental impacts. This is achieved through green design, environmentally friendly construction, maintaining low pollutant and emissions levels and improving waste management practices.

The Smart Environment theme also supports SDG 11 - Sustainable Cities and Communities. As part of the JLT landscaping and smart irrigation programme, DMCC conducted initial workshops and briefing sessions in 2018 with the appointed contractor. The objective is to develop a landscaping master plan for the community incorporating smart and sustainable solutions that aim to maximise the efficient use of water.

DMCC's buildings retrofit initiative aims to reduce energy and water demand, enhance building environment, improve individuals' well-being, and reduce maintenance and operational costs. The initiative involves identifying partners who DMCC can collaborate with on retrofitting buildings across the Master Community. DMCC is partnering with energy services companies which will offer a broad range of energy

solutions. The long-term target is to have all buildings in the Master Community retrofitted by 2030. This will positively contribute to the Dubai Supreme Council of Energy 2030 targets, which aim to reduce electricity and water demands in existing buildings by 30% by 2030.



CASE STUDY: One JLT Retrofitting pilot

In 2018, retrofitting interventions were undertaken on One JLT, a LEED Gold Building, Design and Construction (BD+C) Certified building. Retrofitting activities included fire audits, live data monitoring of energy consumption, HVAC and chilled water use performance, automated water dosing treatment for water tanks, automated tracking of parking and building occupancy, external landscaping work, and a reserve fund study to ensure adequate future repair and maintenance provisions.

Furthermore, One JLT was registered with USGBC ARC platform in 2018, and requires continuous reporting and tracking of the following sustainability KPIs:

- Energy consumption
- Water consumption
- Waste generation
- Transportation surveys
- Air quality testing and occupants survey

DMCC will be implementing the systems and processes required to monitor these KPIs in 2019. In addition, 2019 retrofitting initiatives for One JLT will include energy audits, instalment of enhanced air filtration systems, solar car parking shades, electric vehicle recharging stations and integration of existing building management system into DMCC's centralised Asset Management system.

ENVIRONMENT AND INFRASTRUCTURE

DMCC strives to improve its performance related to water and energy consumption and management of waste for its construction projects, in alignment with SDG 12 - Responsible Consumption and Production. In 2018, DMCC had two ongoing construction projects – the Uptown Dubai district and the DMCC Coffee Centre.

“ We have formalised our commitment to environmental stewardship through our latest HSE policy, fully acknowledging the impacts that our construction projects and activities can have on the environment. Beyond compliance, we continue making significant investments to reduce the environmental footprint of our operations and encourage our contractors and suppliers to follow suit. ”

Paul Ashton, Executive Director, Property, DMCC



Uptown Dubai

The Uptown Dubai district is under construction according to the LEED Gold certification. The development consists of seven towers and a central plaza that span an area of more than 10 million square feet. The construction site operates a systematic procedure of waste segregation, regular monitoring of noise pollution levels, implementation of dust control measures to maintain air quality levels, and weekly inspections.

During 2017, the excavation phase for Uptown was completed where a large majority of onsite heavy-duty equipment operated on diesel fuel, thereby resulting in high diesel consumption. In 2018, the foundation of the buildings was built which involved various water-intensive construction activities such as dust suppression, mixing concrete and testing test pipes, tanks and vessels for leakage which caused the significant increase in water use.

Environmental performance	2017	2018
Diesel consumption (GJ)	6,220	569
Water consumption (m ³)	852	2,152
Recycled waste (tonnes)	698	0.6
Waste sent to landfill (tonnes)	13	233



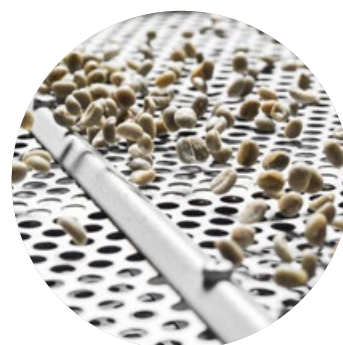
DMCC Coffee Centre

Opened in late 2018, the DMCC Coffee Centre offers world-class services for storage, processing, warehousing and delivery for up to 20,000 tonnes of green coffee beans annually. Its construction complied with DMCC's HSE Guidelines and its contractor reported on the required environmental indicators.

a result, 2018 environmental indicators for the Coffee Centre show a significant increase across all metrics compared to 2017. The large majority of onsite tools and equipment operated on diesel fuel. Water was sourced from the local utility to mix concrete and test pipes, tanks and vessels for leakage.

The DMCC Coffee Centre construction was initiated in the last quarter of 2017, and most of the construction activities for the Centre were completed in the first half of 2018. As

Environmental performance	2017	2018
Diesel consumption (GJ)	56	0
Electricity (GJ)	15	1,260
Water consumption (m ³)	2,309	7,695
Waste sent to landfill (tonnes)	71	9,123 ²¹



²¹ The calculations for the waste figures under the DMCC Tea and Coffee Centre operations were converted from cubic metres to tonnes to ensure consistency and comparability. The conversion factor used was calculated by taking average density for medium-level compacted waste components - concrete, sand, metal - ferrous, and rubble as 749.5 kg/m³. Source: <https://www.epa.vic.gov.au/business-and-industry/lower-your-impact/-/media/Files/bus/EREP/docs/wastematerials-densities-data.pdf>

ENVIRONMENT AND OPERATIONS

DMCC monitors its environmental performance to identify opportunities of enhancing its operations and efficiency.

The DMCC Coffee Centre was launched after a soft opening in November 2018. The centre offers world-class infrastructure and services for the storage, processing and delivery of green coffee beans, as well as offices and a training campus. The 2018 data represents the combined environmental performance of DMCC Tea and Coffee Centres. The data for the Coffee Centre includes its operations in November and December of 2018 after its soft launch. In 2019, DMCC will be conducting a utility data management analysis to streamline the boundary between the two centres.

DMCC Tea and Coffee Centre operations environmental performance

	2016	2017	2018
Electricity (GJ)	3,331	3,804	3,738
Water consumption (m ³)	3,665	4,419	3,655
Recycled waste (tonnes)	44	46	26.7
Waste sent to landfill (tonnes) ²²	47	60	288



²² The calculations for the waste figures under the DMCC Tea and Coffee Centre operations were converted from cubic metres to tonnes to ensure consistency and comparability. The conversion factor used was calculated by taking average density for medium-level compacted waste components – paper, dry and wet compacted cardboard, kitchen-type food waste, plastic bags, glass, and concrete as 339.28 kg/m³. Source: <https://www.epa.vic.gov.au/business-and-industry/lower-your-impact/-/media/Files/bus/EREP/docs/wastematerials-densities-data.pdf>

ENVIRONMENT AND COMMUNITY

In 2018, new environmental initiatives were introduced to improve the environmental performance of the Master Community.

The lakes around the JLT community consist of salty shallow underground water naturally found in the area. In 2018, water levels in the lakes have been reduced along with the removal of sludge to facilitate the installation of new boreholes to avoid stagnation and preserve water. Automated water-filling of the lakes to maintain a constant water level and sewerage flow monitoring are planned. Following an investigation to source a biological solution for the treatment of the

lakes, environmentally friendly bio-agents were selected to maintain the water quality without using added chemicals.

Waste management was a key focus for the Master Community in 2018. Waste segregation systems and procedures were introduced to the waste management system. Recycling stations for paper, cans and plastics are now available across the Master Community.



CASE STUDY: Great Battery Challenge

In 2018, DMCC partnered with Duracell, a DMCC member company, to implement the Great Battery Challenge across all JLT towers. Batteries contain a number of heavy metals and toxic chemicals, which are often disposed as general waste in landfills leading to soil contamination and water pollution. The challenge encouraged all JLT residents to contribute towards reducing battery waste by recycling old batteries in any of the 26 designated containers placed around JLT, thereby reducing the burden on the environment.

The challenge became a permanent environmental programme of DMCC and is now being promoted to the rest of the JLT towers.

The environmental data collection for the Master Community activities has been reviewed by DMCC, and certain metrics have been identified as not being monitored accurately. The data presented in the 2018 report is based on the latest analysis of the available data. In 2019, a detailed analysis will be performed to increase accuracy and streamline environmental data collection across DMCC construction, operations and Master Community to enhance the monitoring process and the identification of environmentally effective measures.

The water consumption increase shown in the below table has resulted from the requirement of the Master Community to be in compliance with the Dubai Municipality Water Systems Monitoring and Inspection Guideline which requires all water tanks to be cleaned at least once every six months from 2018 onwards. During 2017, one water tank cleaning was undertaken and in 2018, two water tank cleanses were undertaken in conjunction with a further water tank refill, in line with the need to disinfect the water pipe network.

Overall environmental performance of the DMCC master community²³

	2016	2017	2018
Diesel consumption (GJ)	-	675	597
Electricity (GJ)	45,980	44,788	44,177
Water consumption (m ³)	6,531	13,961	33,409
Recycled waste (tonnes)	-	90	123
Waste sent to landfill (tonnes) ²⁴	-	19,648	20,192

DMCC's total environmental performance

The table below summarises the 2018 environmental performance for the Uptown Dubai and Coffee Centre construction projects, Tea and Coffee Centres operations and the Master Community. The major share of the total energy consumption for 2018, approximately 97%, is attributed to

electricity consumption across different DMCC construction activities and operations. The electricity consumed was sourced from the local utility authority. Furthermore, a major proportion of the waste generated was sent for landfilling in line with the local regulatory requirements.

	2018 Total
Diesel consumption (GJ)	1,166
Electricity (GJ)	49,175
Total energy consumption (GJ)	50,341
Water consumption (m ³)	46,910
Waste sent to landfill (tonnes)	29,836
Recycled waste (tonnes)	150.3

²³ The environmental performance data for the Master Community has been restated as DMCC introduced a more holistic and detailed data collection and tracking mechanism in 2018, resulting in a change in some of the performance numbers for the previous years.

²⁴ The calculations for the waste figures under DMCC Master Community were converted from cubic metres to tonnes to ensure consistency and comparability. The conversion factor used was calculated as the average density for different domestic solid waste components as 143.77 kg/m³. Source: https://www.researchgate.net/publication/261357543_Composition_of_Domestic_Solid_Waste_and_The_Determination_of_its_Density_Moisture_Content_A_case_study_for_Tikrit_City_Iraq





CREATING STRONG COMMUNITIES

CREATING STRONG COMMUNITIES

DMCC builds sustainable communities through strategic investments, thought leadership and meaningful engagement with local communities. By building strategic partnerships and deploying diverse community initiatives, DMCC enhances the vibrancy of its communities.

Creating a cohesive, safe and smart community is at the heart of DMCC's approach for operations of its communal areas. The community programmes focus on physical safety and provide avenues for a healthy lifestyle and cultural engagement to community members.

SDGs covered in this section



Key objectives	Key achievements	Future objectives
Smart and sustainable community	<ul style="list-style-type: none"> Advanced the development of DMCC Asset Management Systems by initiating the development of a 3D Digital Twin of the Master Community 	<ul style="list-style-type: none"> Integrate DMCC's Smart and Sustainable District strategy with the Dubai Smart City initiative Introduce five mobility related community services and initiatives in 2019
Safe and family-friendly environment	<ul style="list-style-type: none"> Initiated a licensing process for building managers who are employed by the towers' owners to increase oversight 618 security guards received 430 hours of training on 27 security related topics 	<ul style="list-style-type: none"> Evaluate the current traffic challenges of the Master Community to mitigate traffic incidents Remove the gas cylinders throughout the Master Community Install Automatic Number Plate Recognition (ANPR) systems
Community engagement	<ul style="list-style-type: none"> JLT hosted one of the Dubai Fitness Challenge villages over a period of one month, with more than 125,000 visitors In 2018 the DMCC Grant Fund donated a total of AED 365,000 to the Diamond Development Initiative (DDI) to support educational initiatives in the Democratic Republic of Congo 	<ul style="list-style-type: none"> Increase the number of family-focused community events Enhance internal communication on DMCC's volunteering policy and provide volunteering opportunities for employees Develop and implement a policy for corporate giving to financially support relevant communities, based on DMCC's areas of impact Provide support to the DDI and coffee and tea producers Development of a Community Portal Establishment of smart kiosks

DMCC'S SMART AND SUSTAINABLE DISTRICT

In 2018, DMCC launched its strategy to transform the business, Master Community and free zone into a smart and sustainable district. DMCC's objective is to create an agile culture that transforms business environments, supports disruptive and innovative technologies and adapts to growing environmental requirements. The six themes pursued under the strategy are detailed below. DMCC's Smart and Sustainable District strategy supports the UAE government's contribution to the SDGs by driving progress towards the delivery of SDG 9 - Industry, Innovation and Infrastructure, SDG 11 - Sustainable Cities and Communities, SDG 12 - Responsible Consumption and Production and SDG 13 - Climate Action.

DMCC made significant progress against a number of initiatives across the six themes in 2018. It approved a new, transparent governance structure, under which an independent legal entity was formed to manage the community on behalf of DMCC. The entity has created new Master Community plans and governance structure covering all land and infrastructure contained within the Master Community. The entity is registered with the Real Estate Regulatory Agency (RERA).

Smart District Platform and Governance

– creating a central platform that stores, analyses and visualises Smart and Sustainable District data, providing oversight of all DMCC's performance criteria. It will be integrated with Smart Dubai's platform.

“**DMCC's strategy for a smart and sustainable district will leverage digital transformation to provide a better experience for our community, and to meet our environmental and sustainable responsibilities.**

James Garbutt, Head of Asset Management, DMCC



Smart District Platform and Governance

DMCC is developing Smart Centralized Platform, Smart Asset Management System and Sustainable District data, providing oversight of all DMCC's performance criteria. It will be integrated with Smart Dubai's platform.

The DMCC Smart Asset Management system is part of Smart District Platform, a five-year plan to create a world-class system in line with the international framework requirements of ISO 55001.²⁵ In 2018, a GIS and Computer Aided Facility Management (CAFM) system were developed to help optimise the efficiency of DMCC's asset management. The Smart Asset Management system continues to be developed and will be integrated with multiple systems including the Dubai Smart City system. The Master Community assets were transferred into the Smart Asset Management system in 2018 and are now being verified and enhanced, so that they accurately depict the Master Community and can be used in relation to monitoring and tracking multiple aspects of the Master

Community including its energy and water consumption, H&S metrics and environment in real time.

As part of its asset management platform, DMCC is developing a 5D virtual district. This 5D district project will reduce operating costs, generate revenue streams, encourage collaboration and deliver greater visibility and transparency to the community. A key element of the 5D district project is the development of a 3D Digital Twin of the DMCC Master Community. This Digital Twin district will be created via a community portal, the use of data and analytics, and modelling and visualisation. The smart digital community portal will allow community members to engage on a single platform and provide feedback on community-related issues such as physical damage, safety and maintenance.

Smart Mobility

In 2018, bus services were initiated in partnership with the Roads and Transport Authority (RTA) across the JLT district.

In 2019, DMCC will deploy a series of projects facilitating greater mobility services.

Bike-sharing

DMCC is partnering with RTA to implement a bike-sharing scheme across JLT. This will make DMCC the first district to adopt a bike-sharing scheme, which is integrated with the city's public transport systems.

DMCC aims to make the bike-sharing option available within the district by the end of Q1 in 2019.

²⁵ ISO 55001 is a suite of standards launched by the International Organisation for Standardisation (ISO). The standards specify the requirements for establishing an asset management system within the context of the organisation, thereby supporting organisations in developing a structured, best practice approach to managing the lifecycle of their assets

Electric scooters and buggies

DMCC will launch an electric-scooters sharing programme within the district that are tracked via a centralised system.

The electric buggies initiative from 2017 will be reintroduced with increased health and safety considerations, including speed limits, route management, centralised tracking and use of mobilisation technologies.

Eco-car washing

DMCC is identifying suitable car-washing service providers with high-quality, low water-consumption technologies and solutions.

Smart parking

Future plans include introducing a district-wide smart valet parking system for community members.

Bus shelters

In collaboration with RTA, DMCC launched an initiative to develop new bus shelters within the Master Community that include smart technology and Wi-Fi services for commuters.

Three shelters are under approval and will be piloted for implementation in 2019.

Smart living

Empowering property owners to better manage their property by capitalising on opportunities to share information and resources and reduce costs.

DMCC will be developing new design guidelines to enhance the quality of the retail and commercial units within JLT. These guidelines are driven by community wellbeing and embed safety, accessibility, noise, amenities, maintenance and security considerations.

Smart infrastructure

Digitising infrastructure assets, both physical and ICT-based, to improve the efficiency and cost-effectiveness of development and delivery of services.

As a further step to improving the quality of life for community members, an implementation plan is already in place to set up digital smart kiosks across the community and provide free public Wi-Fi. The enhancement plans include

the installation of digital signage for improved aesthetics, security and safety across the Master Community.

Smart environment

Sustaining a clean environment enabled by cutting-edge ICT innovations such as a community portal, community app, and digital signage. This theme is detailed under the environmental stewardship section.

Smart business

Enhancing business processes with the adoption of new technology such as block-chain and artificial intelligence to complete the digital transformation of DMCC's various processes and services.

Under the Smart Business theme, 2018 initiatives included an online payment portal for fees and fines for sub-developers, the introduction of a digital invoicing mechanism and training and awareness sessions on 'smart skills enhancement programmes'.

SAFE AND FAMILY FRIENDLY ENVIRONMENT

The security of DMCC's Master Community continues to be a major priority. DMCC supports the government's national agenda to offer a sense of security under the banner of a 'Safe Public and Fair Judiciary'. Staffed by 200 security officers and managed by Concordia, the DMCC Community Central Command Centre operates 24 hours a day, seven days a week in collaboration with Dubai Police, Dubai Civil Defence and Dubai Municipality. In case of any safety incidents, the Security Central Command Centre alerts key members of the community immediately by SMS and monitors JLT Towers to provide assistance whenever needed. The Security Central Command Centre is being renovated to integrate smart tools.

In terms of data collection and monitoring, security incidents cover many types of scenarios: vehicle accidents, property damage, unauthorised activity and fire incidents among others. Incidents recorded during 2018 included near misses. Overall, the number of reported incidents rose by 14% compared to 2017, an increase that is attributed to better and easier reporting mechanisms and to the increase of incident types that are monitored.

DMCC regularly evaluates its security guard workforce. This includes on-the-job knowledge and communication skills to ensure all security personnel are up-to-date with security matters. External mandatory training is delivered by Dubai Police – Security Industry Regulatory Agency. Regular training is delivered on topics that include DMCC crisis management plan, conflict

management and emergency response. During 2018, 618 attendees received 430 hours of training on 27 topics. In 2019, the impact of training will be integrated into DMCC's evaluations of security guard workforce performance.

DMCC's crisis management plan ensures that when critical situations arise, its crisis management team has a well-coordinated response with supporting departments and the local emergency response teams, based on defined priorities and processes. Comprehensive training for all senior and executive management is planned for 2019. In addition, DMCC is in the process of consolidating a Business Continuity Plan that is expected to be completed during 2019.

“

Community safety for DMCC is not just about incident prevention, but also about building a cohesive, vibrant and happy community. We aim to provide a space where people are safe, inspired and enjoy a high quality of life.

”

Marwan AlBlooshi, Executive Director
of Group Security, DMCC





COMMUNITY ENGAGEMENT

As a key objective of its sustainability strategy, DMCC aims to create a positive impact for local communities by transforming its business model to address societal needs.

To create a vibrant and participatory community, DMCC offers opportunities to its local community to engage in various activities covering six key themes: fitness and sports, family and kids, markets, culture and community, sustainability, and corporate social responsibility. During 2018, more than 100,000 people participated in community events organised by DMCC.

DMCC strives to fulfil its role as a good corporate citizen and supports community contributions through donations and volunteering work. It promotes the UAE spirit of giving and community participation by encouraging all its employees to participate in volunteering activities for up to 3 paid leave days a year.

Fostering community engagement

DMCC is establishing a community engagement policy to ensure a consistent approach towards community engagement in line with its corporate strategy and the government directives. DMCC's framework will set out initiatives that promote positive change in its strategic focus areas, including education, health and wellbeing of community members. In 2018, DMCC supported community initiatives, which aimed at promoting cultural inclusion, driving community empowerment and encouraging fitness and healthy living of community members.

Key community events held in 2018 include:

DMCC Family Day: DMCC organises an annual Family Day for JLT residents. The event is an opportunity for DMCC to engage more closely with the JLT residents / tenants and the property owners, thereby collecting informal feedback in a more direct and personal manner. This allows DMCC to gain community members' confidence and promote its values and objectives during the event. The event includes food, entertainment, educational activities and other interactive arenas. In 2018, more than 900 people attended the Family Day.



DMCC Social Impact Programme: The DMCC Social Impact Programme is a strategic community programme aligned with the UN SDGs and contributes to SDG 4 - Quality Education. DMCC's strategy includes partnering with leading community organisations that have a proven track record for delivering results. In 2018, DMCC granted funds to the DDI to support activities that focus on enhancing the artisanal mining sector. The fund will allow DDI to provide educational support to the Democratic Republic of Congo. DDI supports 112 girls and boys with their high school. The grant provided by DMCC will support the continuation of the children's education in the next academic year. DMCC's investments in the Social Impact Programme will continue to build talent by increasing access to quality education for communities in developing countries.



DMCC Fitness Village: Introduced by Sheikh Mohammed bin Rashid Al Maktoum, the annual Dubai Fitness Challenge encourages residents to engage in 30 minutes of activity a day for 30 days. In 2018, DMCC hosted one of the five dedicated Fitness Villages located across the city. During the four-week challenge, more than 125,000 people visited the DMCC Park Fitness Village, the most well-attended in Dubai by far. It offered hundreds of free sports and fitness activities classes such as pilates, yoga, volleyball, rugby and dance. An adrenaline play park encouraged children to take part as well. People of determination were able to access the event.





GRI content index

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omissions and clarifications	UNGC Principles
GRI 101: Foundation 2016				
General Disclosures				
GRI 102: General Disclosures 2016	Organizational profile			
	102-1 Name of the organization	Front cover		
	102-2 Activities, brands, products, and services	13	For more information please refer to: https://www.dmcc.ae/	
	102-3 Location of headquarters	Dubai, UAE	https://www.dmcc.ae/about-us	
	102-4 Location of operations	United Arab Emirates	https://www.dmcc.ae/about-us	
	102-5 Ownership and legal form	DMCC is a Government of Dubai entity.	https://www.dmcc.ae/about-us	
	102-6 Markets served	12, 13	https://www.dmcc.ae/about-us	
	102-7 Scale of the organization	12	https://www.dmcc.ae/about-us	
	102-8 Information on employees and other workers	32		
	102-9 Supply chain	20, 74		
	102-10 Significant changes to the organization and its supply chain	No significant changes to DMCC and its supply chain in 2018.		
	102-11 Precautionary Principle or approach	16		Principle 7
	102-12 External initiatives	16, 58, 75		
	102-13 Membership of associations	16, 58, 75		
	Strategy			
	102-14 Statement from senior decision-maker	5		
	Ethics and integrity			
	102-16 Values, principles, standards, and norms of behaviour	31		
	Governance			
	102-18 Governance structure	59		
	Stakeholder engagement			
	102-40 List of stakeholder groups	19		
	102-41 Collective bargaining agreements	Collective bargaining agreements are prohibited under UAE labour law		

For the Materiality Disclosures Service, GRI Services reviewed that the GRI content index is clearly presented and the references for Disclosures 102-40 to 102-49 align with appropriate sections in the body of the report.

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omissions and clarifications	UNGC Principles
	102-42 Identifying and selecting stakeholders	18		
	102-43 Approach to stakeholder engagement	18, 19, 20, 21, 22		
	102-44 Key topics and concerns raised	20, 21, 23, 69		
	Reporting practice			
	102-45 Entities included in the consolidated financial statements	DMCC is a government entity and do not disclose its financial performance		
	102-46 Defining report content and topic Boundaries	7, 23, 24, 25		
	102-47 List of material topics	23, 24, 25		
	102-48 Restatements of information	87	The environmental performance data for the master community has been restated as DMCC introduced a more holistic and detailed data collection and tracking mechanism in 2018, resulting in updating the performance of previous years	
	102-49 Changes in reporting	No significant changes from previous reporting periods	DMCC's first sustainability report	
	102-50 Reporting period	6		
	102-51 Date of most recent report	DMCC published its first sustainability report in August 2018, covering its 2017 performance		
	102-52 Reporting cycle	DMCC commits to report its sustainability performance on an annual basis		
	102-53 Contact point for questions regarding the report	7	DMCC.sustainability@dmcc.ae	
	102-54 Claims of reporting in accordance with the GRI Standards	7		
	102-55 GRI content index	To be updated		
	102-56 External assurance	Assurance readiness was sought for this report		

Material Topics

GRI 200 Economic Standard Series

Indirect Economic Impacts

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omissions and clarifications	UNGC Principles
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Emirate of Dubai		
	103-2 The management approach and its components	13		
	103-3 Evaluation of the management approach	13		
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	12, 82, 84, 92, 93, 94		
	203-2 Significant indirect economic impacts	13		

Procurement Practices

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	7, 74		
	103-2 The management approach and its components	74		
	103-3 Evaluation of the management approach	74		
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	74		

Anti-corruption

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	7, 24		Principle 10
	103-2 The management approach and its components	60, 62, 63, 64		
	103-3 Evaluation of the management approach	60, 62, 63, 64		
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	63		
	205-2 Communication and training about anti-corruption policies and procedures	22		
	205-3 Confirmed incidents of corruption and actions taken	62	DMCC did not face any reported incidents of corruption in 2018.	

GRI 300 Environmental Standards Series**Energy**

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	25		Principle 8
	103-2 The management approach and its components	78, 79, 80, 81		
	103-3 Evaluation of the management approach	78, 79, 80, 81		

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omissions and clarifications	UNGC Principles
GRI 302: Energy 2016	302-1 Energy consumption within the organization	84, 85, 87		
Water				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	25		Principle 8
	103-2 The management approach and its components	78, 79, 80, 81		
	103-3 Evaluation of the management approach	78, 79, 80, 81		
GRI 303: Water 2016	303-1 Water withdrawal by source	84, 85, 87	DMCC water usage is sourced from the local utility.	
Effluents and Waste				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	25		Principle 8
	103-2 The management approach and its components	78, 79, 80, 81		
	103-3 Evaluation of the management approach	78, 79, 80, 81		
GRI 306: Effluents and Waste 2016	306-2 Waste by type and disposal method	84, 85, 87		
Environmental Compliance				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	24		Principle 7
	103-2 The management approach and its components	78, 80		
	103-3 Evaluation of the management approach	78, 80		
GRI 307: Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	DMCC did not receive any penalties or non-compliance with respect to environmental laws and regulations in 2018.		
GRI 400 Social Standards Series				
Employment				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	24, 28		
	103-2 The management approach and its components	28, 30, 31		
	103-3 Evaluation of the management approach	28, 30, 31		

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omissions and clarifications	UNGC Principles
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	35		
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	33		
	401-3 Parental leave	33		

Occupational Health and Safety

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	24, 45		
	103-2 The management approach and its components	45, 47, 48, 49		
	103-3 Evaluation of the management approach	45, 47, 48, 49		
GRI 403: Occupational Health and Safety 2016	403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	50, 51	Occupational diseases, lost days, and absenteeism were not included due to lack of data	
	403-5 Worker training on occupational health and safety	47		

Training and Education

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	24	DMCC employees	
	103-2 The management approach and its components	41, 42		
	103-3 Evaluation of the management approach	41, 42		
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	43		
	404-2 Programs for upgrading employee skills and transition assistance programs	42		
	404-3 Percentage of employees receiving regular performance and career development reviews	41		

Diversity and Equal Opportunity

GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	25		
	103-2 The management approach and its components	36		
	103-3 Evaluation of the management approach	36		

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omissions and clarifications	UNGC Principles
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	36		
Non-discrimination				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	25		Principle 6
	103-2 The management approach and its components	44		
	103-3 Evaluation of the management approach	44		
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	In 2018, no incidents in relation to discrimination were recorded within the organisation.		
Freedom of Association and Collective Bargaining				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	Not applicable		Principle 3
	103-2 The management approach and its components	Not applicable		
	103-3 Evaluation of the management approach	Not applicable		
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Collective bargaining agreements are prohibited under UAE labour law.		
Child Labour				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28, 44		Principle 5
	103-2 The management approach and its components	44		
	103-3 Evaluation of the management approach	44		
GRI 408: Child Labour 2016	408-1 Operations and suppliers at significant risk for incidents of child labour	44	DMCC operates in the UAE and complies with UAE Labour Law, which prohibits child labour.	
Forced or Compulsory Labour				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28, 44		Principle 4

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omissions and clarifications	UNGC Principles
	103-2 The management approach and its components	44		Principle 4
	103-3 Evaluation of the management approach	44		
GRI 409: Forced or Compulsory Labour 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour	32	DMCC operates in the UAE and complies with UAE Labour Law, which prohibits forced labour.	
Human Rights				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28, 44		Principles 1 and 2
	103-2 The management approach and its components	44		
	103-3 Evaluation of the management approach	44		
GRI 412: Human Rights Assessment 2016	412-1 Operations that have been subject to human rights reviews or impact assessments	44	It is part of DMCC's human rights impact assessment next steps.	
Local Communities				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	25		
	103-2 The management approach and its components	90, 91		
	103-3 Evaluation of the management approach	90, 91		
GRI 413: Local Communities 2016	413-2 Operations with significant actual and potential negative impacts on local communities	92, 93, 94, 95, 97, 98		
Customer Privacy				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	24, 64		
	103-2 The management approach and its components	64		
	103-3 Evaluation of the management approach	64		
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	64	No customer data breach related issues / complaints were received in 2018	

GRI Standard	Disclosure	Page number(s) and/or URL(s)	Omissions and clarifications	UNGC Principles
Socioeconomic Compliance				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	24, 62		
	103-2 The management approach and its components	62, 63, 64		
	103-3 Evaluation of the management approach	62, 63, 64		
GRI 419: Socioeconomic Compliance 2016	419-1 Non-compliance with laws and regulations in the social and economic area	62	DMCC did not suffer any legal action or fine for non-compliance with social and economic laws or regulations in 2018	
Organisation specific material topic				
Innovation and digitization				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	24, 68		Principle 9
	103-2 The management approach and its components	68, 69		
	103-3 Evaluation of the management approach	68, 69		
Innovation and digitilisation	New services and digitilisation of existing services	69		
Emergency & crisis management				
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	25		
	103-2 The management approach and its components	95		
	103-3 Evaluation of the management approach	95		
Emergency & crisis management	Safety of the JLT community	95		

Glossary

Academic Institutions	An educational institution dedicated to education and research.
Accident (s)	An event that causes harm, illness, injury or death, or otherwise any other loss through damage to property.
Communities	Group of people with diverse characteristics who are linked by social ties, share common perspectives, and engage in joint action in geographical locations or settings.
DMCC Coffee Center	A facility developed by DMCC, offering world-class infrastructure and services for storage, processing, warehousing and delivery of coffee to precise specifications.
DMCC Disputes Centre	Centre provided by DMCC offering both workplace and commercial mediation services to member companies and its employees in respect of workplace related disputes.
DMCC employee turnover	DMCC defines its turnover as the number of employees that leave DMCC due to termination, change of jobs, change of country, or retirement divided by the total number of its permanent employees.
DMCC License	License issued by DMCC to operate within the DMCC Free Zone.
DMCC Policies	The relevant DMCC policies notified by DMCC to the Counterparty from time to time.
DMCC Smart and Sustainable District Strategy	Strategy developed and implemented by DMCC to create a life and business experience for the community through initiatives and projects focused on efficiency optimization, services integration and people and information protection
DMCC Tradeflow	A dedicated, online platform for registering the ownership of commodities stored in facilities in the UAE.
DMCC's Representative	Concordia DMCC or such other facilities management provider as may be appointed by DMCC from time to time.
DMCCA	The regulating authority for DMCC.
DMCCA Regulations	All rules or regulations, directives and other orders, by laws, codes of practice and other subordinate legislation of DMCCA as may be amended from time to time.
Employees and their representatives	DMCC employees and their families and dependents.
Global Reporting Initiative	The Global Reporting Initiative is an international independent standards organization that helps businesses, governments and other organizations understand and communicate their impacts on issues such as climate change, human rights and corruption.
Global Reporting Initiative Standards	The GRI Standards are the first global standards for sustainability reporting. They feature a modular, interrelated structure, and represent the global best practice for reporting on a range of economic, environmental and social impacts.

HSE Guidelines	Working guidelines launched by DMCC in 2018, identifying and encompassing the working behaviours and safe working practices that are mandatory for Community Users within the DMCC Free Zone and the Master Community, whether used as a place of residence, work, leisure or otherwise.
HSE Policy	The policies, processes and procedures issued by DMCC to regulate HSE within the Master Community, may be amended from time to time, including the detailed HSE Guidelines.
Industry and trade associations	An industry trade group, business association, sector association or industry body, is an organization founded and funded by businesses that operate in a specific industry.
Kimberley Process	The Kimberley Process (KP) is a commitment to remove conflict diamonds from the global supply chain.
Leadership in Energy and	DMCC leads the Kimberley Process Certification Scheme in the UAE – a joint government, industry and civil society initiative to stop the flow and trade of conflict diamonds.
Environmental Design (LEED)	A global green building rating system, providing a framework to create healthy, highly efficient and cost-saving green buildings.
Managing Agent	Any person or body appointed by the Master Developer to represent or otherwise undertake or administer any of the functions of the Master Developer within the DMCC Free Zone or the Master Community.
Master Community	DMCC's master community comprised in the JLT developed or to be developed on a portion of the land comprising Plot 814, Parcel ID No. 393 Emirates Hill First, Dubai and situated between 5th and 6th Interchanges, Sheikh Zayed Road, Dubai, which is divided into plots and Common Areas and includes all and any reductions and extensions from time to time.
Master Community Rules	Rules of the Master Community, as may be amended from time to time
Member company	A company licensed to operate in or from the DMCC Free Zone or such other commercial entity regulated by DMCCA pursuant to the DMCCA Regulations.
Near miss	An unplanned event that did not result in injury, illness, or damage but has the potential to do so.
Non-governmental organizations	Any non-profit, voluntary citizens group which is organized on a local, national or international level.
Outsourced employees	DMCC contracted employees, such as the call centre, delivery service, the DMCC Tea Centre employees and others.
Owner's representative	A Competent Person or organisation appointed or designated by an Owner to perform the Owner's duties and responsibilities on the Owner's behalf. The Owner is directly responsible for the Owner's Representative's conduct. An Owner's Representative can include an Owner's Association Manager.

Glossary

Owners' association	An association of Owners of Jointly Owned Property formed pursuant to the Jointly Owned Property Law.
Permanent employees	Employees who have been hired for a position without a pre-determined time limit.
Reporting agencies	Reporting agencies are generally one of two types: reporting either on individuals or on businesses. Examples: MSCI, CDP, Bloomberg.
Stakeholders	Stakeholders are defined as entities or individuals that can reasonably be expected to be significantly affected by the organization's activities, products, and services; and whose actions can reasonably be expected to affect the ability of the organization to successfully implement its strategies and achieve its objective.
Suppliers	A supplier is an entity that supplies goods and services to another organization. This entity is part of the supply chain of a business.
Sustainable Development Goals	The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015 (including the UAE), provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. The Agenda encompasses 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries - developed and developing - in a global partnership.
Topic boundary	As per GRI the topic boundary requests a description of 'where the impacts occur' for each material topic, and 'the organization's involvement with the impacts'.
UN WEPs	United Nations Women Empowerment Principles, emphasizing the business case for corporate action to promote gender equality and women empowerment in the workplace, marketplace and community. DMCC signed the UN Women's Empowerment Principles (WEPs) in 2018 and became a member of the UAE WEPs taskforce
UNGC	United Nations Global Compact is a non-binding United Nations pact to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. DMCC, as signatories to the UNGC since August 2017, use the sustainability report as DMCC's Communication on Progress (COP) on UNGC Principles

Abbreviations

AML	Anti-money laundering
ANPR	Automatic Number Plate Recognition
BD+C	Building Design and Construction
CAFM	Computer Aided Facility Management
CEO	Chief Executive Officer
CFT	Combating the Financing of Terrorism
COP	Communication on Progress
COSHH	Control of Substances Hazardous to Health Regulations
COSO	Committee of Sponsoring Organizations of the Treadway Commission
CSA	Control Self-Assessment Policy

DDE	Dubai Diamond Exchange
DDI	Diamond Development Initiative
DGCX	Dubai Gold & Commodities Exchange
DGD	Dubai Good Delivery Framework
DMCC	Dubai Multi Commodities Centre, established pursuant to Law No. 4 of 2001 and by virtue of Decision No. 4 of 2002 and Decision No. 2 of 2006, each issued in the Emirate of Dubai
DPMC	Dubai Precious Metals Conference
EIA	Environmental Impact Assessment
ERM	Enterprise Risk Management
ESCO	Energy Services Company
FATF	Financial Action Task Force
GDP	Gross Domestic Product
GDPR	European General Data Protection Regulation
GIS	Geographic Information System
GJ	Gigajoules
GJEPC	Gem & Jewellery Export Promotion Council
GRI	Global Reporting Initiative
H&S	Health and Safety
HR	Human Resources
HSE	Health, Safety and Environment
HVAC	Heating, Ventilation and Air-conditioning
IGC	Independent Governance Committee
ILOOSH	International Occupational Safety & Health
ISO	International Organization for Standardization
ISR	Information Security Regulation
JLT	Jumeirah Lakes Towers
KPIs	Key Performance Indicators
KYC	Know Your Customer
LEED	Leadership in Energy and Environmental Design
LTI	Lost time injury
LTIFR	Lost time injury frequency rate
m³	Cubic metres
MoU	Memorandum of Understanding
OECD	Organization for Economic Co-operation and Development
ORI	Operational Readiness Inspection
RERA	Real Estate Regulatory Agency
RICS	Royal Institution of Chartered Surveyors
RJC	Responsible Jewellery Council
RTA	Roads and Transport Authority
SC	Steering Committee
SDG	Sustainable Development Goals
SMEs	Micro, small and medium-sized enterprises
STR	Suspicious Transaction Reporting
UAE	United Arab Emirates
UBO	Ultimate Beneficial Owner
UNGC	United Nations Global Compact
USGBC	US Green Buildings Council
VAPT	Vulnerability Assessment and Penetration Testing
VAT	Value Added Tax
WEPS	Women Empowerment Principles

