
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

QATAR ALUMINIUM LIMITED (QATALUM)

CERTIFICATE
NUMBER

195

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

11 APRIL 2022

DATE OF EXPIRY

10 APRIL 2025

CERTIFIED SINCE

11 APRIL 2022

AUTHORISED BY

A stylized, handwritten signature in black ink, appearing to be 'J. H.' followed by a long horizontal stroke.

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Aluminium smelting and casthouse operations for
the manufacture of extrusion ingots and primary
foundry alloy in Mesaieed Industrial City (MIC),
Qatar.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Qatalum
ENTITY NAME	Qatar Aluminium Limited (QATALUM)
CERTIFICATION SCOPE	Aluminium smelting and casthouse operations for the manufacture of extrusion ingots and primary foundry alloy in Mesaieed Industrial City (MIC), Qatar.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">28 November – 16 December 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 March 2022
AUDIT SCOPE	<p>The audit scope included the smelter and casthouse operations, carbon plant, power plant, port and storage facilities and Head Office functions such as human resources, supply chain, health and safety, security, environment and sustainability, emergency/ fire, marketing and sales, internal audit, medical first aid, finance and legal.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:

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- ✔ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
 - ✔ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - ✔ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - ✔ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION
PERIOD

11 April 2022 – 10 April 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

10 October 2023

CERTIFICATE
NUMBER

195

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has a system in place that includes a formal process to determine Applicable Laws and legal requirements and to raise awareness to all relevant personnel. The Entity ensures continuing compliance through a formal annual compliance reviews.
1.2 Anti-Corruption	Minor Non-Conformance	The Entity has Anti-Bribery, Corruption and Anti-Fraud Policies which are communicated throughout the Entity to work against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The policies are reviewed annually, however the Entity has not yet documented a formal Bribery risk assessment to determine the potential Bribery and Corruption related risks to ensure the continuing suitability, adequacy and effectiveness of existing Anti-Bribery, Corruption and Anti-Fraud policies.
1.3 Code of Conduct	Conformance	The Entity has a documented Code of Conduct which is widely communicated, made aware to all as minimum expectation for working in the Entity. It includes principles relevant to environmental, social and governance related performance expectations.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity implements and maintains a corporate HSE (Health, Safety and Environment) Policy and a CSR (Corporate Social Responsibility) Directive that are consistent with applicable industry practices.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management has formally authorized HSE (Health, Safety and Environment) and CSR (Corporate Social Responsibility) Policies, and regularly reviews these to support the provision of resources for effective application of these policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates the Policies internally and external communication is based on type and extent of stakeholders relevant to the Entity's operations.
2.2 Leadership	Conformance	The Entity has nominated the Environment & Sustainability Manager as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard through an appropriate job description.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented, implemented and is maintaining a HSE Management System as per ISO 14001 and ISO 45001 which is certified by an external third party auditor.
2.3b Environmental and Social Management Systems (social)	Minor Non-Conformance	The Entity is implementing a CSR (Corporate Social Responsibility) Directive, however it does not demonstrate a Management System approach in all aspects.
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity has implemented a Responsible Sourcing Policy in line with its Supplier Code of Conduct: https://eprocurement.qatalum.com/Suppliers/Documents/Qatalum%20Supplier%20Code%20of%20Conduct.pdf</p> <p>While many controls are exercised in the pursuit of its sourcing policy, the extent of the application of the Entity's Policy is not observed to be a complete formal risk-based approach in developing criteria, evaluations and needed oversight covering environment, social, and governance issues of its supply chain, and hence, is considered not fully effective.</p>
2.5 Impact Assessments	Conformance	The Entity has conducted a detailed environmental impact analysis (EIA) which covers environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis prior to the construction process. In addition, the Entity has implemented effective controls based on a mitigation hierarchy for all impacts related to environmental, social, cultural and Human Right aspects identified.
2.6 Emergency Response Plan	Conformance	The Entity has emergency response and evacuation plans developed in collaboration with potentially affected stakeholder groups such as the MESAIEED Industrial City (MIC), nearby industries, Workers and their representatives.
2.7 Mergers and Acquisitions	Conformance	The Entity has committed to a Due Diligence process including environmental, social and governance issues if any mergers and acquisitions are undertaken under the control of the Entity, though no mergers and acquisitions are foreseen in the business strategy.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has addressed all requirements related to the management of closure, decommissioning and divestment needs as it arises from the business strategy. The Joint Venture Agreement also includes a review of environmental, social and governance issues in the planning process.

CRITERION	RATING	COMMENT
3.1 Sustainability Reporting	Minor Non-Conformance	The Entity has publicly disclosed its 2020 Sustainability Report on its website: https://www.qatalum.com/AboutUs/Sustainability/Documents/Sustainability%20Report%202020.pdf However, the Report does not disclose the governance approach and its material environmental, social and economic impacts.
3.2 Non-compliance and liabilities	Conformance	The Entity has publicly disclosed the information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in its annual Sustainability Report 2020 (page 9, Transparency (Fines and Penalties)): https://www.qatalum.com/AboutUs/Sustainability/Documents/Sustainability%20Report%202020.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has captured all payments made to governments on a legal and/or contractual basis in the annual financial report. The Entity's management is committed to complying with all applicable laws and ethical principles. In addition, the Entity also has a General payable procedure for any permitted payments to other governments. The Entity pays legal and obligatory payments related to taxes and duties. More information on tax obligations and transactions can be found in the annual report.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity implements accessible, transparent, understandable and culturally and gender sensitive, Complaints Resolution Mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. The Entity has made its incident management system open to the public to report any concerns: https://synergi.qatalum.com/Synergi/default.aspx?dmn=5633
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the carbon footprint of its product lines for which Aluminium is used in its life cycle impact assessment, using guidelines and methods the EU Emissions Trading System (ETS) methodology, International Aluminium Institute and European Aluminium guidelines, ISO14044 and ISO14064.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity's customer technical service function fulfils all customer requests including provision of adequate

CRITERION	RATING	COMMENT
		cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium (containing) product(s), when requested.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has not made any public communication on LCA (Life Cycle Assessment) to date. The Entity has a process that would provide public access to the LCA information and its underlying assumptions including system boundaries if the Entity.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity considers recovery targets on an annual basis for different grades of products to minimize the generation of Process Scrap. The Entity re-uses/recycles 100% of the generated scrap in a controlled manner.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates scrap of different alloys and grades for recycling. The scrap is kept in bins which are provided with a bar coded label that provides the alloy code.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed an Aluminium recycling strategy that includes specific activities to achieve recycling goals in a timely manner.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has plans in place to engage with local collection and recycling systems in Qatar to support accurate measurement and efforts to increase recycling rates for their products containing Aluminium.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity discloses GHG emissions and energy use in their annual Sustainability Report (pages 12-14): https://www.qatalum.com/AboutUs/Sustainability/Documents/Sustainability%20Report%202020.pdf However, the public disclosure of GHG emissions and energy use is not fully reported by source.
5.2 GHG emissions reductions	Conformance	The Entity has established, implemented and published time-bound GHG emissions reduction targets and implemented a plan to achieve these targets. The targets address major material sources of Direct and Indirect GHG Emissions.
5.3a Aluminium Smelting (management system)	Conformance	The Entity operates its Environmental Management System in accordance with ISO 14001:2015 that has

CRITERION	RATING	COMMENT
		adequate evaluation procedures and operating controls to limit Direct GHG Emissions.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has demonstrated that the average Direct and Indirect Emissions are below 8 tonnes CO ₂ -eq per metric tonnes of Aluminium.
5.3c Aluminium Smelting (after 2020)	Not Applicable	The Entity commenced Aluminium production before 2020 and hence this Criterion is not applicable.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has quantified air emissions that have potential adverse effects on humans and/or the environment and has established programs for the reduction of these emissions in line with local regulations and own standards. The Entity has reported the Emissions to Air in their annual Sustainability Report 2020 (page 21-22): https://www.qatalum.com/AboutUs/Sustainability/Documents/Sustainability%20Report%202020.pdf
6.2 Discharges to Water	Conformance	The Entity discharges cooling and scrubbing water used in the Power Plant and the Fume Treatment Plants to sea and has a system to quantify and report these discharges. The Entity's Environmental Management System addresses controls needed to minimize adverse effects and compliance with applicable regulatory requirements. The Entity publicly reports the Discharges to Water in the annual Sustainability Report (page 19-20): https://www.qatalum.com/AboutUs/Sustainability/Documents/Sustainability%20Report%202020.pdf
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity assesses areas where Spills or Leaks may potentially occur through a risk assessment and registry process.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity maintains an Environmental Management System that has adequate procedures to prevent and detect Spills and Leakage. Bore wells for groundwater monitoring are available and are being tested periodically as per legal requirements.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity's Environmental Management System has adequate procedures for reporting of Spills internally and externally to stakeholders and regulators.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity's Sustainability Report 2020 (page 19) includes Spills that occurred detailing the impact and remediation:

CRITERION	RATING	COMMENT
		https://www.qatalum.com/AboutUs/Sustainability/Documents/Sustainability%20Report%202020.pdf There were no significant reportable spills since 2017 onwards.
6.5a Waste management and reporting (strategy)	Conformance	The Entity implements a waste management strategy taking into consideration the Waste Mitigation Hierarchy. Ongoing projects are available for minimizing waste generation and improving waste recycling.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity publishes an annual Sustainability Report that presents data on the quantity of Hazardous and Non-Hazardous Waste generated. However the Sustainability Report 2020 (page 20-21) does not address the associated waste disposal methods: https://www.qatalum.com/AboutUs/Sustainability/Documents/Sustainability%20Report%202020.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Minor Non-Conformance	The Entity crushes and stores SPL in an open yard, temporarily with approval from the relevant authority that is not consistent with the aim to prevent the release of SPL or leachate to the environment. The Entity has developed a long term strategy to manage SPL waste handling and recycling/disposal.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has five year strategic plans for pot relining and SPL recycling that aims for optimising the processes for the recovery and recycling of carbon and refractory materials, segregating SPL materials and recycling in other industries as an energy supplement.

CRITERION	RATING	COMMENT
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity does not landfill Untreated SPL and hence there is no potential for adverse environmental effects that may arise from landfill.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity has both short term and long term strategies that are reviewed both monthly and annually for options to increase SPL recycling rates. The Entity does not landfill SPL as it does not undertake treatment of SPL.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity does not discharge SPL to marine and aquatic environments. This position is confirmed via policies and procedures.
6.8a Dross (recovery)	Conformance	The Entity treats its Dross produced from the Casthouse by sending to an external recycling company and the recovered aluminium is used in the Entity's Casthouse.
6.8b Dross (recycling)	Minor Non-Conformance	The Entity does not have formal accounting reports of treated Dross residue and recycled quantities to demonstrate the efforts to maximize recycling of Dross residue managed by the Dross recovery contractor.
6.8c Dross (review of alternatives)	Conformance	The Entity has demonstrated that they have considered alternative plans and options to landfilling of Dross residues.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The Entity has mapped water withdrawal and use by source and type. Seawater usage is monitored and reported in the Sea Water Balance Report. The fresh water usage is monitored and reported in the Utilities Water Balance Report.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water-related risks in their Area of Influence as part of the EIA and technical and enterprise risk assessment processes.
7.2a Water management (management plans)	Conformance	The Entity has implemented suitable water management plans, with time-bound targets that address material risks identified through the enterprise risk assessment.
7.2b Water management (monitoring)	Conformance	The Entity monitors the effectiveness of water management plans via several mechanisms, including monitoring the effectiveness of controls implemented to address the water-related material risks, water-related KPIs and as part of monitoring programs implemented within the Entity's Environmental Management System.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	The Entity has publicly disclosed its water withdrawal, use and risks in its Sustainability Report 2020 (page 19): https://www.qatalum.com/AboutUs/Sustainability/Documents/Sustainability%20Report%202020.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on Biodiversity from the land use and activities in the Entity's Area of Influence through a specialist third party consultant. The scope of the study included setting a terrestrial and marine biodiversity baseline, critical habitat assessment, the consideration of necessary mitigation efforts and opportunities for enhancements.
8.2a Biodiversity management (biodiversity action plans)	Minor Non-Conformance	The Biodiversity Action Plan (BAP) includes time-bound targets which have been developed and implemented by the Entity based on Environmental Impact Assessment (EIA), however the BAP has not addressed one of the material Biodiversity impacts related to reedbeds.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Minor Non-Conformance	The Entity has not yet established and implemented a constructive Biodiversity Action Plan designed in accordance with the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Conformance	The achieved Biodiversity outcomes have been shared with all relevant stakeholders such as the Mesaieed Industrial City (MIC) and Qatar Ministry of Environment and made publicly available in the Sustainability Report.
8.3 Alien Species	Conformance	The Entity has conducted an Environmental Impact Assessment through a specialized third party consultant. The scope included assessment of accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. The existing controls were considered sufficient to mitigate the risk of introduction of Alien Species.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established and implemented a CSR (Corporate Social Responsibility) Directive including a Policy commitment to respect Human Rights.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity has a Worker Welfare Program comprising a number of documents and programs. It has a Corporate Social Responsibility (CSR) Directive that respects and observes for Human Rights. However, the CSR Directive does not specifically reference the UN Guiding Principles on Business and Human Rights. The CSR Directive is supported well with HR Policy, Supply Chain Directive, Supplier Code of Conduct and supporting documents in terms of implementation of processes needed to protect Human Rights. However, the Entity's formal Human Rights Due Diligence processes and stakeholder engagement needs strengthening to better identify, prevent, mitigate and account for how the Entity addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Minor Non-Conformance	The Entity does not have a formal Human Rights Due Diligence process and documentation to substantiate that the Entity is fully aware if it caused or contributed to adverse Human Rights impacts. Though the Entity has implemented a Worker Welfare Program to prevent Human Rights impacts, it was not able to demonstrate that its Human Rights Due Diligence processes and outcomes sufficiently remediate the Human Rights impacts and risks.
9.2 Women's Rights	Minor Non-Conformance	The Entity implements a CSR Directive and HR Policies and processes, however they are inadequate to ensure respect for the rights and interests of women, consistent with international standards, including the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). The Entity's policies do not reference nor can the Entity provide evidence that they are consistent with international standards and UN CEDAW.
9.3 Indigenous Peoples	Not Applicable	As per the Entity's EIA (Environment Impact Assessment) of the smelter project in 2006, there

CRITERION	RATING	COMMENT
		were no Indigenous Peoples and hence this Criterion is not applicable.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there were no presence of Indigenous Peoples or their lands, territories and resources identified.
9.5 Cultural and sacred heritage	Not Applicable	The Entity's Environment Impacts Assessment (EIA) in 2006 confirms that there are no sacred or cultural heritage sites and values within the Entity's Area of Influence and hence this Criterion is not applicable.
9.6a Resettlements (avoid or minimise)	Not Applicable	As per the Entity's EIA (Environment Impact Assessment) report in 2006, there were no identified social impacts requiring Resettlement, hence this Criterion is not applicable.
9.6b Resettlements (where unavoidable)	Not Applicable	As per the Entity's EIA (Environment Impact Assessment) report in 2006, there were not identified social impacts requiring re-settlement, hence this Criterion is not applicable.
9.7a Local Communities (rights and interests)	Conformance	The Entity participates in local industrial community meetings and operates in accordance with local obligations to respect legal and customary rights and interests of local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity participates in the Mesaieed Industrial City (MIC) Environment Sub-Committee meeting together with other organisations in the industrial city as a collaborative mechanism to discuss and address any concerns. There are no significant Human Rights issue with adverse impacts on local Community livelihoods resulting from its activities.
9.7c Local Communities (livelihoods)	Conformance	The Entity participates in the Mesaieed Industrial City (MIC) Environment Sub-Committee meeting together with other organisations in the industrial city as a collaborative mechanism to discuss and address any concerns.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has policies and controls in place for not contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity only hires security providers that are generally recognized and accepted in the community and respect Human Rights in accordance with GDIS (General Directorate of Industrial Security) directions.

PRINCIPLE 10 LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity neither promotes nor rejects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under Applicable Law. ILO conventions are not ratified by the State and hence not considered.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	There are no agreements for Collective Bargaining. Though the Applicable Law has provisions for such agreements, this has not been practiced by Workers as choice. The Entity has a commitment to respect the rights of Workers to Collective Bargaining, participate in any collective bargaining process in good faith, and adhere to collective bargaining agreements when it exists.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity supports alternative means of association for Workers such as HSE Committees, though legally allowed a Workers Committee is not widely practiced.
10.2a Child Labour (minimum age)	Conformance	The Entity has policies and systems in place that neither use nor support the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law. The minimum age of employment is 21.
10.2b Child Labour (hazardous)	Conformance	The Entity has policies and systems in place that neither use nor support the use of Child Labour nor engage in or support Hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Entity has policies and systems in place that neither use nor support the use of Child Labour nor engage in or support Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has policies and practices implemented that do not engage in or support Human Trafficking either directly or through any employment or recruitment agencies. Contracts with recruitment agents show these principles are adopted in dealing with candidates.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has policies and processes implemented that prevents any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies. A Worker Welfare Inspection Checklist is used for contractors' CSR inspection which has a specific check on payments or deposits.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not practice or require Migrant Workers to lodge deposits or security payments at any

CRITERION	RATING	COMMENT
		time. The contractor CSR welfare checklist also covers this topic for inspection under Forced Labour.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not have a policy or practice that would hold Workers in Debt Bondage or force them to work in order to pay off a debt. Worker interviews confirmed there is no debt bondage in the employment relationship. The CSR welfare checklist used in contractors' inspections verifies this expectation.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not apply restrictions on the freedom of movement of Workers in the workplace or in on-site housing, other than pre-agreed arrangements for emergency on-call duties which is part of mutual agreement of employment. Worker interviews confirmed that they are no undue pressure or restriction on their freedom of movement.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain original documents of Workers' identity papers, work permits, travel documents or training certificates. The CSR welfare checklist for contractors also expects similar practice with the topic appearing as one of the inspection items.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's Human Resources (HR) policy allows Workers the freedom to terminate their employment at any time without penalty, giving notice of reasonable length as defined in the HR policy. The HR policy is available on the intranet to all employees.
10.4 Non-Discrimination	Minor Non-Conformance	The Entity has a commitment in its Code of Conduct for fairness in treatment of employees and creating a workplace free from any form of harassment. However, there is no formal non-discrimination management process adopting applicable ILO conventions to proactively evaluate potential Discrimination and identify and mitigate any discriminatory impacts, or to support that the Code of Conduct commitment of 'fairness in treating employees' is adequate and effective.
10.5 Communication and engagement	Conformance	The Entity has adequate processes and mechanisms governed by its Code of Conduct to ensure open communication and direct engagement with Workers regarding working conditions and resolution of workplace and compensation issues. An open dialogue culture is visible where people can express their concerns without threat of reprisal, intimidation or harassment supported by grievance management procedure.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	The Entity has a documented and formal disciplinary process that neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. Disciplinary action is provided in a uniform and fair manner.
10.7a Remuneration (living wage)	Conformance	The Entity performs periodic compensation benchmarking analysis and reviews its compensation respecting the rights of Workers to a living wage and ensure that wages paid for a normal working month to be at par or above the industry standard. Monetary compensation includes salary and other discretionary allowances.
10.7b Remuneration (method of payment)	Conformance	The Entity has adequate processes and controls to make wage payments that are timely, in legal tender and fully documented and shared with employees in payslips.
10.8 Working Time	Conformance	The Entity implements effective processes and controls to ensure compliance to Applicable Law and the Entity's standard on Working Time (including Overtime working hours), public holidays and paid annual leave and other leaves entitlements as per the HR Policy.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety and is endorsed by the Chief Executive Officer.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety and is endorsed by the Chief Executive Officer.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity is ISO 45001:2018 certified. The Entity has a core policy that includes Occupational Health and Safety and a commitment to comply with all Applicable Law on health and safety and international standards.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Health, Safety and Environmental Policy addresses the importance of safe work practices and employees empowerment including Workers right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity is ISO 45001:2018 certified. The Entity has documented and implemented an Environmental, Occupational Health and Safety Management System that is in conformance with applicable national and international standards such as ISO 14001 and ISO 45001.
11.3 Employee engagement on health and safety	Conformance	The Entity has provided employees with various mechanisms such as joint health and safety committees, by which they can raise, discuss, and participate in the resolution of Occupational Health and Safety issues with management.
11.4 OH&S performance	Conformance	The Entity maintains certification to ISO 45001:2018. The Entity evaluates its Occupational Health and Safety performance using relevant leading and lagging indicators.

Document Control and Version History

Revision	Date	Notes
0	11 April 2022	Initial Certification Audit - Full Certification