

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

MOZAL SA

CERTIFICATE
NUMBER

204

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

14 JUNE 2022

DATE OF EXPIRY

13 JUNE 2023

CERTIFIED SINCE

14 JUNE 2022

AUTHORISED BY

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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

Manufacture of primary aluminium at Mozal
smelter and port operations located in Maputo,
Mozambique.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Mozal SA
ENTITY NAME	Mozal SA
CERTIFICATION SCOPE	Manufacture of primary aluminium at Mozal smelter and port operations located in Maputo, Mozambique.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Smelting
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">6 - 9 December 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">5 May 2022
AUDIT SCOPE	<p>The audit scope includes both the smelting plant and harbour of Mozal, located in Maputo, Mozambique.</p> <p>The Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Smelting <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.

CERTIFICATION PERIOD 14 June 2022 – 13 June 2023

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 13 November 2022

CERTIFICATE NUMBER 204

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. There are systems in place (e.g. a legal register and audits) to maintain awareness of, and to ensure compliance with applicable law. The Entity holds ISO 14001 certifications from an accredited certification body). The South32 group supports the Entity with legal counsel.
1.2 Anti-Corruption	Conformance	<p>The Entity works against corruption in all its forms. Anti-corruption is embedded in the group's processes. South32' CEO confirmed that the group is 'committed to the highest standards of integrity and accountability'. The Group's Code of Business Conduct prohibits fraud, bribery and corruption in any form, and requires compliance with applicable anti-bribery and corruption laws wherever they conduct business - see South32 code of conduct (English): https://www.south32.net/docs/default-source/corporate-governance/south32-code-speak-up-policy-english.pdf</p> <p>The Group has established its own business integrity team that oversees compliance with anti-corruption rules. Suppliers have to accept the minimum supplier requirements related to sustainability and business conduct - see https://www.south32.net/docs/default-source/suppliers/south32-sustainability-and-business-conduct-supplier-requirements-(english).pdf</p> <p>Purchase Order Standard Terms also require good governance practices from the suppliers https://www.south32.net/docs/default-source/suppliers/purchase-order-standard-terms_v1-2.pdf</p> <p>More information can be found on South32's website regarding business ethics at: https://www.south32.net/who-we-are/our-approach/code-of-business-conduct</p>
1.3 Code of Conduct	Conformance	<p>South32 Group's Code of Business Conduct applies to Mozal. It prohibits fraud, bribery and corruption in any form, and requires compliance with applicable anti-bribery and corruption laws wherever they conduct business.</p> <p>The Code is publicly available on the South32</p>

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		<p>website at: https://www.south32.net/docs/default-source/corporate-governance/south32-code-speak-up-policy-english.pdf?sfvrsn=2f7a09d4_14</p> <p>The Group has also issued a dedicated anti-bribery and corruption policy, in which it is clearly stated: "we prohibit bribery and corruption in any form, and comply with applicable anti-bribery and corruption ("BC) laws wherever we conduct business. Refer to: https://www.south32.net/docs/default-source/corporate-governance/south32-anti-bribery-and-corruption-english.pdf</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The South32 Group has issued its sustainability policy which includes environmental, social, and governance topics and the Entity being part of this group has communicated this policy and associated standards internally.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Vice President Operations takes overall responsibility and authority for ensuring conformance with the ASI Performance Standard. The Vice President Operations is supported by the Entity's operations team and the broader South32 group. The South32 Sustainability Policy is subject to periodic review and was last updated in December 2019.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The South32 Group has communicated the policies internally (intranet, postings etc.) and externally via the website at: https://www.south32.net/who-we-are/risk-governance . Workers have received training regarding environmental, social, and governance policies.
2.2 Leadership	Conformance	The Vice President Operations takes ultimate responsibility and authority for ensuring conformance with the ASI Performance Standard. Day-to-day business regarding the implementation of the standard is the responsibility of the Business Improvement Manager.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an environmental management system according to ISO 14001:2015 which has been certified by an accredited certification body. The certificate is valid until 18 July 2023.
2.3b Environmental and Social Management Systems (social)	Conformance	Social aspects of the business are duly managed, and the Entity has implemented an active social management system, as has been confirmed by a

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		document review and interviews with the Entity's management, workers and external stakeholders. Worker related topics (occupational safety & health, labour rights) and human rights are addressed by the Entity's social management system, consistent with South32's Sustainability policy and associated documents. The system is appropriately documented.
2.4 Responsible Sourcing	Conformance	<p>The Entity has made its expectations of its suppliers publicly available: https://www.south32.net/docs/default-source/suppliers/south32-sustainability-and-business-conduct-supplier-requirements-(english).pdf</p> <p>The Entity's sourcing process is documented and is in accordance with the requirements of the ASI Performance Standard. Regular supplier evaluation takes place by the South32 group. Depending on a supplier risk assessment, suppliers are audited to ensure compliance with international standards and South32 expectations.</p>
2.5 Impact Assessments	Conformance	<p>Larger projects or major changes to existing facilities did not take place since the Entity joined ASI. Environmental impact assessments are part of the legal requirements before the implementation of any development, expansion or significant change. Currently, no major changes/projects are foreseen.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has developed site specific emergency response plans. The Entity also holds an ISO 14001 certification which is current to the Entity's certification scope under the ASI Performance Standard. First aid services are provided by an on-site medical contractor. Emergency exercise reports demonstrate that emergency situations are regularly practiced.</p>
2.7 Mergers and Acquisitions	Conformance	<p>This criterion is not applicable, as all mergers and acquisitions are managed by South32 at a Group level. The Entity's majority shareholder South32 will engage and perform due diligence in all the activities surrounding any merger and acquisition activities. The other shareholders will be engaged as part of that process.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>South32 has issued an internal group standard regarding closure. The Entity has a documented closure plan in place. The plan addresses environmental, social and governance aspects.</p>

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PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>South32 has recently (October 2021) issued its Sustainable Development Report, covering the Financial Year 2020 (i.e. 1 July 2019 - 30 June 2021). It has been produced based on the reporting principles of the Global Reporting Initiative (GRI). The report is available on South32's website at: https://www.south32.net/docs/default-source/sustainability-reporting/fy20-sustainability-reporting/sustainable-development-report-2020.pdf</p> <p>In the report, certain data is aggregated on group level and is not site specific.</p>
3.2 Non-compliance and liabilities	Minor Non-Conformance	<p>As witnessed by the Entity's management, there were no fines or penalties imposed in the reporting year. This information is included as part of an annual report directed to the local government. However, the Entity has not demonstrated that information with regard to Mozal on significant fines, judgments, penalties or non-monetary sanctions for failure to comply with applicable law (including the fact that there were none of these) have been made publicly available in an adequate way (e.g. in the sustainability report or on the website).</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to anti-corruption requirements related to payments to governments and facilitation of payments – refer: https://www.south32.net/who-we-are/risk-governance</p> <p>As witnessed by the Entity's management, the Entity did not make government payments other than legally or contractually required. All payments are subject to annual external financial audit. It is worthwhile to mention that South32 has a specific 'Government Facing Representative Compliance Questionnaire' in place to avoid illegal payments to government officials via joint venture partners or suppliers who may interact with these officials.</p>
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has implemented a documented complaint resolution mechanism, which is based on the UN Guiding Principles on Business and Human Rights</p>

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		https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Major Non-Conformance	The Entity had planned to assess the life cycle impact of its products and commissioned an external expert, but due to Covid-19 pandemic, this assessment was delayed and documentation was still work in progress.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	At the time of the audit, there had been no customer inquiries for a cradle-to-gate life cycle assessment of the Entity's products. However, the Entity has a system in place to respond to such requests when they are made and as soon as the LCA is available.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	This criterion is not applicable, as the Entity does not intend to publicly disclose its life cycle assessment.
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 has a documented system and procedures in place to manage aluminium scrap (including product specification, casthouse quality plan, procedure on identification and handling of non-conforming product). Targets for scrap generation are set, measured and reported in the entity's balanced scorecard. All aluminium scrap is returned to the casthouse.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has developed and implemented processes that allow for the separation of different grades of aluminium. Due to quality reasons, it is in the site's own interest, to separate the various alloys.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity has disclosed its material greenhouse gas emissions and energy use by source in South32's Sustainable Development Report 2020, refer page 50,

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		<p>https://www.south32.net/docs/default-source/sustainability-reporting/fy20-sustainability-reporting/sustainable-development-report-2020.pdf and further data available in South32's sustainability databook, which can be accessed at: https://www.south32.net/docs/default-source/all-financial-results/2021-annual-reporting-suite/sustainability-databook-published-2021.xlsx</p> <p>However, South32 does not currently disclose "energy by source" at site level (due to commercial sensitivities), therefore no data are publicly available for Mozal site.</p>
5.2 GHG emissions reductions	Conformance	<p>South32 has published group GHG emissions targets which incorporate the Entity. South32 has a long-term goal to achieving net zero GHG emissions by 2050. The first five-year plan targets to keep Scope 1 emissions in fiscal year (FY) 2021 below the group's FY 2015 baseline. Please see South32 sustainability development report for details about the Group's targets www.south32.net/docs/default-source/sustainability-reporting/fy20-sustainability-reporting/sustainable-development-report-2020.pdf (pages 41-43).</p>
5.3a Aluminium Smelting (management system)	Conformance	<p>The Entity provided documented evidence that it has an effective management system, evaluation procedures, and operating controls in place to limit the direct GHG emissions. The internal South32 environment standard provides guidance for how sites must prepare and report on GHG emissions. Details of GHG reporting protocols applied to group reporting are referenced in the FY21 Sustainability Databook at: https://www.south32.net/docs/default-source/all-financial-results/2021-annual-reporting-suite/sustainability-databook-published-2021.xlsx</p>
5.3b Aluminium Smelting (up to and including 2020)	Conformance	<p>Due to its use of electricity from hydropower, the Entity's Scope 1 and Scope 2 GHG emissions from the production of aluminium are already substantially below a level of 8 tonnes CO₂-eq per metric tonne aluminium.</p> <p>The Entity has records of GHG Scope 1 and Scope 2 emissions readily available, and has published its Scope 1 and 2 emissions in FY21 as part of South32's FY21 Sustainability Databook at: https://www.south32.net/docs/default-source/all-financial-results/2021-annual-reporting-suite/sustainability-databook-published-2021.xlsx</p>

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5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity as the site was erected 1998 - prior to 2020.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Minor Non-Conformance	The Entity has systems in place to regularly monitor and manage emissions to air. Results are shared with the neighbouring community and the government. However, it was not demonstrated that these data have not been publicly reported as required (e.g. in the Sustainability Report).
6.2 Discharges to Water	Minor Non-Conformance	The Entity has systems in place to regularly monitor and manage discharges to water. Results are shared with the neighboring community and the government. Quantities of discharged water are made publicly available in the South32 sustainability databook, at: https://www.south32.net/docs/default-source/all-financial-results/2021-annual-reporting-suite/sustainability-databook-published-2021.xlsx However, it was not demonstrated that data on adverse effects on humans or the environment related to discharged water, and plans to minimise these adverse impacts have not been publicly reported as required (e.g. in the sustainability report).
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Within the scope of its certified environmental management system according to ISO 14001, the Entity periodically assesses the major risks areas related to spills and leakages.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented an ISO14001 certified environmental management system, including emergency, monitoring and communication procedures, to deal with the major risks of spills and leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The requirement to disclose to affected parties the volume, type and (potential) impact of significant spills is covered by the Entity's ISO 14001 certification.
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	As witnessed by the management, there were no significant chemical and/or hydrocarbon spills during the reporting period. Incidents and spills are reported in the Entity's annual monitoring report which is sent to the local authorities. However, the Entity has not publicly disclosed impact assessments of spills in an appropriate

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		manner (e.g. disclosure in the publicly available sustainability report).
6.5a Waste management and reporting (strategy)	Conformance	In line with its ISO 14001 certified environmental management system, the Entity has implemented a waste management strategy according to the waste mitigation hierarchy. This has been confirmed by interviews and a review of the Entity's internal documentation.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity has various channels in place to make information about its environmental, social and governance performance publicly available (including the South32 group sustainability report, community meetings and the annual report to government). However, the group's sustainability report does not contain site specific data and no such data are available on the Entity's website. Using only community meetings and reports to government is not sufficient, as written information is not available to those stakeholders who did not attend the meeting or are non-government.
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 (start 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)	Conformance	The Entity has processes in place to handle Spent Pot Lining in a safe way to prevent leaching. The storage area is in a building, which avoids adverse weather influences.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has processes in place to recover and recycle Spent Pot Lining (SPL). SPL is sold to cement manufacturers. Second method is the treatment of SPL with cement before landfill.

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6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity demonstrated good management practice with regard to spent pot lining (SPL). To minimize adverse environmental effects, the Entity's preferred method is the recycling of its SPL in the cement industry. Second method is the treatment of SPL before landfilling.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity is already using a recycling option by shipping the Spent Pot Lining (SPL) to the cement industry. Only in some occasions the SPL was disposed. The Entity is continually seeking to avoid disposing SPL in landfill.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity's untreated spent pot lining (SPL) is stored in a building. SPL is not discharged to marine or aquatic environments. Most of the SPL is recycled in the cement industry and, where this is not possible, the SPL is treated with cement prior to landfill.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use. All water withdrawal is undertaken in accordance with limits given by the operating permit.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water-related risks in watersheds within their area of influence. The Entity manages water related risks and has implemented a procedure and controls. This includes the ability to operate a desalination plant for supply of water into the operation during extended dry periods. In addition, the Entity has also established a contextual water target that is aimed at identifying opportunities to improve community access to water within the Boane District by June 2022. Further details are available in the South32 Sustainable Development Report at: www.south32.net/docs/default-source/sustainability-reporting/fy20-sustainability-

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		reporting/sustainable-development-report-2020.pdf (pages 50-51).
7.2a Water management (management plans)	Conformance	The Entity has implemented a water management plan and has established controls to monitor the effectiveness of this plan, including a water consumption control program. Procedures for water management have been established and implemented.
7.2b Water management (monitoring)	Conformance	The Entity has established controls to monitor the effectiveness of their water management plan, including a water consumption control program.
7.3 Disclosure of water usage and risks	Conformance	The Entity has made its water consumption and water-related risks publicly available in the South32 sustainability databook FY21 https://www.south32.net/docs/default-source/all-financial-results/2021-annual-reporting-suite/sustainability-databook-published-2021.xlsx
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity is located in an industrial zone. With support from external experts, the Entity has assessed the risk and materiality of impacts on biodiversity from the land use and activities in the Entity's area of influence. The assessment did not identify any relevant impacts or risks.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable, as the Entity's biodiversity assessment did not identify any material impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable, as the Entity's biodiversity assessment did not identify any material impacts.
8.2c Biodiversity management (reporting)	Minor Non-Conformance	Whilst the Entity's biodiversity assessment did not identify material risks, this information has not been made publicly available (e.g. via the group's sustainability report or the Entity's website).
8.3 Alien Species	Major Non-Conformance	The Entity has not demonstrated that it manages alien species as required. Due to the Covid-19 pandemic, the assessment of alien species had been delayed and therefore, at the time of the initial certification audit, there was neither an assessment nor an action plan on hand. The Entity has commenced conducting of such an assessment.

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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 operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
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	<p>South32 has issued its sustainability policy, which states that the group will "respect and promote human rights" This commitment is explained in more detail in the document "Our Approach to Human Rights"</p> <p>https://www.south32.net/docs/default-source/community-and-society/our-approach-to-human-rights-for-publication.pdf</p> <p>The Group has also issued its 2021 Modern Slavery Statement, titled "Respecting Human Rights" https://www.south32.net/docs/default-source/all-financial-results/2021-annual-reporting-suite/modern-slavery-statement-2021.pdf</p> <p>These documents also apply to the Entity. The Entity has communicated the policy to workers, contractors and other stakeholders.</p>
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity has carried out a thorough and comprehensive human rights impact assessment. However, the impact assessment did not include all relevant rights holders.
9.1c Human Rights Due Diligence (remediation)	Conformance	Human rights impact assessments conducted by the Entity identify key human rights risk to be managed by the Entity. These risks are systematically managed by the Entity and/or South32 group.
9.2 Women’s Rights	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the women’s rights requirements, an example is the South32 Group’s Inclusion and Diversity Policy</p> <p>https://www.south32.net/docs/default-source/corporate-governance/002_south32-diversity-and-inclusion-policy.pdf</p>

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		Interviews and document review confirmed that the Entity has an active approach to promote women.
9.3 Indigenous Peoples	Not Applicable	Based on the Entity's stakeholder identification process, there are no indigenous or minority groups, or their lands, territories and resources directly affected by the Entity's operations, but there is a special consideration for the agricultural associations which are mainly composed of women as well as the Djuba Community in which the resettled group (Nkala community) was placed. Resettlement took place more than 20 years ago.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as based on the Entity's stakeholder identification process, there are no Indigenous or minority groups, or their lands, territories and resources directly affected by the Entity's operations. There were no new projects or major changes to existing projects started that had significant environmental or social impacts, since the Entity joined ASI.
9.5 Cultural and sacred heritage	Conformance	The Entity has a formal process in place to identify sacred places and cultural heritage. The process did not identify any of these in the operational area of the Entity. The Entity supports an annual traditional meeting of the Djuba community (which had been affected by resettlements when the plant was erected).
9.6a Resettlements (avoid or minimise)	Not Applicable	A resettlement of the Nkala community took place in 1998, when the Entity was erected. Based on the Entity's stakeholder identification process, there are no indigenous or minority groups, or their lands, territories and resources directly affected by the Entity's operations, but there is a special consideration for the agricultural associations which are mainly composed of women as well as the Djuba community in which the resettled group (Nkala community) was placed. However, this Criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements being considered or taking place during the period since joining ASI, or expected to occur during the certification period.
9.6b Resettlements (where unavoidable)	Not Applicable	A resettlement of the Nkala community took place in 1998, when the Entity was erected. Based on the Entity's stakeholder identification process, there are no Indigenous or minority groups, or their lands, territories and resources

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		<p>directly affected by the Entity's operations, but there is a special consideration for the agricultural associations which are mainly composed of women as well as the Djuba community in which the resettled group (Nkala community) was placed. However, this criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements being considered or taking place during the period since joining ASI, or expected to occur during the certification period.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>South32 has committed itself to recognise and respect the cultures, customs, lifestyles and heritage of the 'lost communities'. Refer to South32 Code of Business Conduct, Section 9 'Building and maintaining trust with our communities' https://www.south32.net/who-we-are/our-approach/code-of-business-conduct</p> <p>South32 is a member of ICMM (International Council on Mining and Metals), and it is their aim to "pursue continual improvement in social performance and contribute to the social, economic and institutional development of host countries and communities" (ICMM Mining Principle 9).</p> <p>The Entity has an active approach towards their 'host communities'. Systematic stakeholder identification and analysis takes place, social studies and risk assessments are conducted regularly. Annually, a 'community investment plan' is being adopted.</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity takes an active approach to identify, prevent and address any adverse impacts on local community livelihoods resulting from its activities. The entity works to systematically improve the life of communities and has adopted an annual "community investment plan".</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity has established robust processes, including regular communication and exchange of views with local communities to ensure respect and support their livelihoods. Supporting measures are summarized in an annual Community Investment Plan.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity has a robust process in place to ensure that it does not contribute to armed conflict or human rights abuses in conflict-affected and high-risk areas. All potential suppliers are systematically screened. According to South32's Conflict Minerals Statement" https://www.south32.net/docs/default-</p>

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		source/sustainability-reporting/fy21-sustainability-reporting/conflict-minerals-statement-(as-at-1-july-2021).pdf , ninety four percent of their direct suppliers are concentrated in Australia, Colombia, Mozambique, United States and South Africa. South32 has no suppliers or customers located in the Democratic Republic of Congo nor its adjoining countries.
9.9 Security practice	Conformance	The Entity subscribes to the Voluntary Principles on Security and Human Rights. This is addressed in the South32 Code of Business Conduct, Section 7 https://www.south32.net/docs/default-source/corporate-governance/south32-code-speak-up-policy-english.pdf The Entity does not employ armed security forces. Interviews with workers confirmed that security staff treats them respectfully.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The 'Respecting Human Rights' section of the South32 Code of Business Conduct states "We are committed to supporting freedom of association" https://www.south32.net/who-we-are/our-approach/code-of-business-conduct As confirmed by interviews with the union leader, workers and management as well as by document review, the Entity respects the rights of workers to unite freely in the unions and seek representation without interference. A freely elected worker representation is in place.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the right of collective bargaining. Worker representatives and management negotiated a comprehensive collective bargaining agreement (CBA).
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion of the ASI Performance Standard is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is not restricted in the country where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	The Entity has robust processes in place to ensure that neither children nor minors are working for them. Interviews with workers, document review and on-site visits confirmed that only adults are hired.
10.2b Child Labour (hazardous)	Conformance	As confirmed by observations during the site walkover as well as interviews and a document review, the Entity does neither use nor support the

CRITERION	RATING	COMMENT
		use of child labour. Persons below the age of 18 years are not employed.
10.2c Child Labour (worst forms)	Conformance	The Entity does neither use nor support the use of child labour and does not engage in or supporting worst forms of child labour.
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity does neither engage in nor support the use of forced labour. The Entity also does not engage in or support human trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and review of the Entity's human rights due diligence assessment.</p> <p>South32 has issued a "Modern Slavery Statement", see https://www.south32.net/docs/default-source/all-financial-results/fy21-annual-reporting-fix/modern-slavery-statement-2021.pdf</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	Interviews with workers, worker representative and management confirmed that the Entity does neither engage in nor support the use of forced labour. The Entity does not require any form of deposit, recruitment fee or equipment advance from workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	Interviews with workers, their representative and management confirmed that the Entity does not require the workers to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	Interviews with workers, their representative and management confirmed that the Entity does not hold workers in debt bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	Interviews with workers, their representative and management confirmed that the Entity does not unreasonably restrict the freedom of movement of workers in the workplace.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Interviews with management and workers confirmed that the Entity does not retain originals of workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Interviews with management and workers confirmed that the Entity does not deny workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length.

CRITERION	RATING	COMMENT
10.4 Non-Discrimination	Conformance	<p>The South 32 Group Code of Business Conduct clearly states: "We value and strive to build inclusion, diversity and equity in our workplace where everyone is valued and can be empowered to achieve their full potential" refer to https://www.south32.net/docs/default-source/corporate-governance/south32-code-speak-up-policy-english.pdf (Section 6).</p> <p>South32 has also issued a specific "diversity and inclusion" policy, refer: https://www.south32.net/docs/default-source/corporate-governance/002_south32-diversity-and-inclusion-policy.pdf</p> <p>Interviews with workers, worker representative and management as well as document review confirmed that the Entity does not deliberately discriminate for reasons mentioned in the criterion. However, the Entity could take a more active approach to promoting people with disabilities.</p>
10.5 Communication and engagement	Conformance	<p>As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.</p>
10.6 Disciplinary practices	Conformance	<p>As confirmed by interviews and document review, the Entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of workers.</p> <p>A formal procedure to manage grievances is in place.</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity does respect the rights of workers to a living wage. The wages paid for a normal working week are well above the living wage and define the industry standard, as confirmed by document review and worker interviews.</p>
10.7b Remuneration (method of payment)	Conformance	<p>Payments to workers are made by the Entity in full and monthly via bank transfer. Workers receive pay slips which list in detail all necessary information about hours worked, surcharges/premiums and deductions.</p>
10.8 Working Time	Conformance	<p>As confirmed by interviews with workers, worker representative and management, the Entity does</p>

CRITERION	RATING	COMMENT
		<p>comply with applicable law and industry standards on working time, public holidays and paid annual leave.</p> <p>Due to the predominant shift work, overtime is limited. The normal work week is 41.85 hours per week on average.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has adopted, implemented and communicated the South32 Group Sustainability Policy and Code of Business Conduct, which addresses occupational health and safety https://www.south32.net/docs/default-source/corporate-governance/south32-code-speak-up-policy-english.pdf</p> <p>These policy statements are supported by the Group's safety standard and health standard. The policies are communicated internally and externally and the Entity demonstrated that the group supports their implementation by provision of personnel and financial resources.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>South32's Group Sustainability Policy and health & safety standards policy apply to the Entity's workers, contractor workers and visitors https://www.south32.net/docs/default-source/corporate-governance/south32-code-speak-up-policy-english.pdf It is stated that 'All our People, Suppliers (which includes contractors) and visitors must be aware of and comply with our health and safety standards, procedures and practices'.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Minor Non-Conformance	<p>Group policy documents regarding occupational health & safety refer to local law and ISO 45001 and enhance the group's code of business conduct. South32 subscribes to the 10 principles of the International Council on Mining and Metals, which Principle 5 reads "Pursue continual improvement in the health and safety performance with the ultimate goal of zero harm".</p> <p>However, neither of the relevant policy documents (Code of Business Conduct, sustainability policy, safety standard and health standard) contain a specific commitment to adhere to the applicable ILO conventions, including ILO C155).</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The Entity's safety standard (Section 5.1) confirms the right of the workers to stop work where there is a threat to health or safety.</p>

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity has implemented and is operating a documented occupational health & safety (OHS) management system. Although not certified against ISO 45001, relevant system elements are in place (e.g. policy, risk assessments, training and performance reviews). It is noted that the Entity achieved a successful campaign to protect workers and their families from Covid-19.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a joint health and safety committee, by which worker representatives can make suggestions and raise concerns regarding occupational health & safety with management.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health & Safety (OH&S) performance regularly and several key performance indicators (leading and lagging) are related to OH&S. The Entity has demonstrated its path to continually improve its OH&S management system.

Document Control and Version History

Revision	Date	Notes
0	14 June 2022	Initial Certification Audit – Provisional Certification