
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

GZ INDUSTRIES LIMITED

CERTIFICATE
NUMBER

301

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

CETIZION
VERIFICA

DATE OF ISSUE

21 JULY 2023

DATE OF EXPIRY

20 JULY 2026

CERTIFIED SINCE

21 JULY 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

Aluminium Stewardship Initiative Ltd
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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

The manufacture of aluminium beverage cans for
the food and beverage Industry at facilities in
Nigeria (Aba and Agbara) and South Africa
(Wadeville).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	GZ Industries Limited
ENTITY NAME	GZ Industries Limited
CERTIFICATION SCOPE	The manufacture of aluminium beverage cans for the food and beverage Industry at facilities in Nigeria (Aba and Agbara) and South Africa (Wadeville).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none">23 – 31 May 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">20 June 2023
AUDIT SCOPE	<p>The audit scope covers the manufacture of aluminium beverage cans for the food and beverage Industry at GZ Industries facilities in Nigeria (Aba and Agbara sites) and Wadeville, South Africa.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <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	<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.

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- ✔ 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 21 July 2023 – 20 July 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 20 January 2025

CERTIFICATE NUMBER 301

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has a documented country level operating procedure for assessing the legal requirements of Nigeria and South Africa.</p> <p>The Company Secretary conducts a monthly review of the legal acts/bills undergoing legislative process. A quarterly legal compliance report is prepared and submitted to the Board of Directors.</p> <p>In case of the South African operation however, the Entity does not have timely renewal of the fire safety permit in accordance with the Hazardous Substance Act 15, 1973, and the previous fire safety permit expired in December 2022.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has documented an Anti-Bribery Policy, available at: https://gzican.com/certifications-and-policies/ as well as being referenced in the Entity's Code of Conduct (page 10 onwards). There is Gift Policy and related records are maintained. Employee training is provided and is mandatory for all employees. There is a 'whistleblower' mechanism to report incidents of bribery on whistleblow@gzican.com and separate phone hotlines in Nigeria and South Africa.</p> <p>As per the Entity's Enterprise Risk Assessment process, risks relating to Corruption/Bribery are addressed and the Entity implements control measures including an expenses policy, and conflict of interest declaration for board and management staff. There has been no reported case of Corruption in recent years.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has developed and implemented the GZI Code of Ethics and Standards of Conduct, which is provided to GZI employees, the GZI Board and other agents of GZI.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has an Environmental, Social and Governance (ESG) Policy which provides a commitment to respect regulations, labour rights, human rights, environment and safety. It has been signed by the Entity's Chief Executive Officer (CEO). The ESG Policy is displayed within plant areas, and is available on the Entity's website: https://gzican.com/certifications-and-policies/</p>

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's HSE Manager is responsible for communicating and implementing the ESG Policy requirements, signed by the Entity's CEO. The ESG Policy is displayed within the plant areas (at all three plants) and internal training is provided to all employees.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The ESG Policy is communicated internally (display and training) as well as to external Stakeholders via the website: https://gzican.com/certifications-and-policies/
2.2 Leadership	Conformance	The Entity's leadership team has confirmed their support to implement the ASI Performance Standard requirements, in terms of necessary resources, infrastructure, employees training and financial support.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented Integrated Management Systems for both Nigerian plants for ISO 9001, ISO 14001 and ISO 45001 and a standalone Environmental Management System for the South African plant. The Environmental Management System is independently audited and certificates are available: Agbara site: https://gzican.com/wp-content/uploads/2021/05/Agbara-ISO14001-Exp-03-2024.pdf Aba site: https://gzican.com/wp-content/uploads/2021/05/Aba-ISO14001-Exp-04-2024.pdf South Africa: https://gzican.com/wp-content/uploads/2021/03/IQNet_40602641-UM15_EN.pdf validity
2.3b Environmental and Social Management Systems (social)	Conformance	There is a documented Social Management System through the establishment of a social policy, a procedure, and risk identification (internal and external). Social audits (SMETA) have been undertaken at all three Facilities.
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity's responsible sourcing related requirements are well defined and are understood by the responsible personnel. However, the Supplier Code of Conduct is in draft stage and there is no evidence regarding the communication of the Responsible Sourcing Policy or Supplier Code of Conduct (final and approved version) to its suppliers. The Entity is planning to implement its Supplier Code of Conduct and commence evaluating implementation status in late

CRITERION	RATING	COMMENT
		2023. The Entity has assessed its upstream suppliers. Aluminium sheet is sourced from an ASI Certified Entity while other major input material suppliers undergo Due Diligence assessment planning considering country specific risks.
2.5 Impact Assessments	Conformance	The Entity has implemented a 'Budget and Budgetary Control Policy' which details annual budgeting, capital expenditure (capex), operational expenditure (opex), project evaluation and approval processes covering broader categories including growth, HSE, cost saving, quality and others.
2.6 Emergency Response Plan	Conformance	There is a documented on-site Emergency Response Plan (ERP) incorporating both Nigerian sites and a separate ERP for the South Africa plant. The ERP addresses emergency scenarios including fire, chemical leakage and gas explosion. Training on the ERP is provided to employees as well as communication about possible emergencies, safety instruction, evacuation map and emergency exit provision. Periodic mock drills are conducted to validate the emergency preparedness.
2.7 Mergers and Acquisitions	Minor Non-Conformance	There has been no merger and acquisition activity in recent years and there will not be any plan in future. The acquisition-related risks are covered in enterprise risk management, requiring Due Diligence, however it does not adequately define the full merger and acquisition activity and company approach.
2.8 Closure, Decommissioning and Divestment	Minor Non-Conformance	There is no formal policy or related procedure for the consideration of environmental, social and governance issues in the planning process for closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed and disclosed its 2022 Sustainability Report detailing its major ESG impacts, risks and performance for both its Nigeria and South Africa locations: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf
3.2 Non-compliance and liabilities	Conformance	There have been no significant fines, judgments, penalties and non-monetary sanctions for failure to comply with applicable Law. There are periodic disclosures (e.g. balance sheet or audited financial statements after shareholders' approval submitted to respective country authorities). This has been

CRITERION	RATING	COMMENT
		disclosed in the 2022 Group Sustainability Report, page 12: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has made payment to Governments on a legal and/or contractual basis (e.g. Value Added Tax, Corporate Tax). Such payment to Governments in terms of taxes are reflected in financial statements, which are independently audited by an independent accounting firm.
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 has established channels for raising grievances. These include email: info@gzican.com through the Entity's website or in written form. There have been no complaints received over the previous year. https://gzican.com/contact-us/
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its can Product for both Nigeria and South Africa, using the cradle-to-gate methodology as per ISO 14040. The Life Cycle Assessment (LCA) flow chart states the LCA approach of cradle-to-gate with module C4 and D.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA was created using the SimaPro LCA software. The ecoinvent version 3.8 (2021) database was used for secondary data related to life cycle stages. The environment impact results are provided for various impact categories including Global Warming Potential (GWP). The highest impact comes from Module A1 due to the aluminium coil consumption in the manufacturing process.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has disclosed its LCA approach in its Sustainability Report: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf Additionally, it provides LCA results to its customers and other interested parties upon request. The Entity is also working to publish Environment Product Declaration (EPD) based on its LCA.

CRITERION	RATING	COMMENT
4.2 Product design	Conformance	The Entity has a dedicated team at Group level which is working to review and improve product and process design for resource efficiency. A step by step approach towards 'downgauging' in consultation with the metal supplier and customer following approval guidelines. This also includes tooling design.
4.3a Aluminium Process Scrap (targets)	Conformance	100% of the Entity's Aluminium Process Scrap is collected and processed through a bailing press to compress into cubes, which are then sent to a metal supplier. There is both a manual and automatic chute to collect and transfer scrap to the bailing press area, as observed during the visit. The inventory records are maintained.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity only uses one material grade, however separates the scrap based on colour (duco) and plain, as evidenced during the site audit. The Entity has developed a procedure for the preparation and export of class process waste for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed its recycling strategy named "every can counts", and disclosed the strategy in the 2022 Sustainability Report, page 30: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf The Entity is also in the process of become a member of the Food Beverage Recycling Alliance (FBRA) Nigeria: https://www.fbranigeria.ng/
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has developed targets for 2023 through to 2026 for the collection of Used Beverage Cans (UBC). A pilot project has recently commenced with schools, corporate customers, and communities. The Entity has a dedicated warehouse external to the manufacturing plant and has installed a bailing press to handle the UBC.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has a metering system to measure energy consumption data (e.g. PMS station for natural gas). The emission factors for Scope 1 are cited from the United Kingdom whilst Scope 2 emissions are derived using South African national emission factors. There is no electricity purchased in either Nigerian plants. The GHG emissions are disclosed in the Sustainability Report, page 29:

CRITERION	RATING	COMMENT
		https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity has implemented a strategic initiative to increase the use of renewable energy, in consultation with an external service provider. However, there is no Group level published GHG emission reduction targets and timeframes in the Sustainability Report, page 29: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Minor Non-Conformance	Air emissions are periodically monitored and reported in the Sustainability Report, page 26 and 27: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf The Entity's environmental permits (known as environmental audit certificate) are issued by the National Environment Standards and Regulations Enforcement Agency (NESREA) (valid September 2022 to 2025) However, the Entity does not have a valid Atmospheric Emission Licence (AEL) as per section 21 of the South African National Environmental Management Air Quality Act, which requires annual submission of an air monitoring report and upload on the government national air quality monitoring and reporting system (NAEIS)
6.2 Discharges to Water	Conformance	The Entity's wastewater from the process is treated in the Effluent Treatment Plant (ETP) and discharged to the municipal sewer. Monthly tests are undertaken by an external accredited agency for Biological Oxygen Demand (BOD), Chemical Oxygen Demand (COD), pH and Aluminium, and are found within permissible limits. The water discharge parameters for Nigeria and

CRITERION	RATING	COMMENT
		<p>South Africa are disclosed in Sustainability Report, page 26 and 27: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has undertaken a Spills and Leakage risk assessment as part of the Environment Management System (ISO 14001) aspects and impact assessment, as well as the Emergency Response Plan which addresses potential risks relating to chemical, oil and gas spills/leaks.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The on-site Emergency Response Plan includes details on management of chemical Spills and gas Leakages. The implementation of defined control measures was checked during the plant visit (e.g. training of personnel, periodic workplace monitoring and reporting and availability of spills kits).</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has a practice to report any incident of Spills/Leakage via contacting the HSE team, email and/or submitting a behavioural observation form (available in plant areas), as checked during plant visit. Subsequently, all such reporting is entered in a report summary sheet (Excel-based tool).</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has established a practice to regularly (monthly) report incidents of Spills/Leakage internally. Annual public disclosure is undertaken via the Sustainability Report, page 24: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has developed a procedure for waste management for both Nigeria and South Africa. It defines waste minimisation including other relevant information for handling Hazardous and Non-Hazardous Waste. Hazardous Wastes are disposed to agencies approved by Ogun State Waste Management Agency (OGWAMA).</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity maintains waste disposal records and discloses these data in the Sustainability Report on page 24. The Entity holds a valid permit issued by OGWAMA relating to the discharge of treated effluent and ETP sludge. Each site maintains an inventory of wastes and are maintained by type and quantity.</p>

CRITERION	RATING	COMMENT
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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 developed a water balance diagram indicating intake from the bore well and distribution to domestic and process consumption. In case of the South African site, the water intake is from the municipal source and treated effluent is discharged into the municipal drain and metering at both the intake and discharge points was found to be functional. Both digital and calibration certificates are available.
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CRITERION	RATING	COMMENT
7.1b Water assessment (risk assessment)	Conformance	The overall water risk is considered high. The Entity level water risk assessment is addressed in the Entity's Environment Management System (ISO 14001) aspect and impact evaluation. The depletion of water resources and water pollution are addressed and mitigation measures or improvement plans have been developed and verified.
7.2a Water management (management plans)	Conformance	The Entity's water management practices are described in the Environment Reporting Procedure, which requires installation of water meters, monitoring and recording of daily readings, regular leakage checks, and installation of automatic valves. The water management plan includes water use reduction targets and a daily check of water based equipment.
7.2b Water management (monitoring)	Conformance	The daily water consumption is recorded along with other requirements such as water consumption per 1000 cans.
7.3 Disclosure of water usage and risks	Conformance	The Entity's water use and water-related risks are detailed in the Sustainability Report, page 25: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Minor Non-Conformance	The Entity has undertaken a Biodiversity risk assessment using an external agency and the Integrated Biodiversity Assessment Tool (IBAT) using site specific information. However, during the site visit, it was observed that some species of flora and fauna were not incorporated in the Biodiversity risk assessment.
8.2a Biodiversity management (biodiversity action plans)	Minor Non-Conformance	There is no documented and formalised biodiversity management plan to mitigate Biodiversity impacts that arise from the Entity's activities and within its Area of Influence. The Entity is currently developing related environment topics such as planting programs to increase greening of the campus and water conservation as part of routine activities, but there is no systematic linkage for its appropriateness to mitigate Biodiversity impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity mitigation measures including tree planting and water conservation are being consulted with internal and external Stakeholders (Local Communities).

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Conformance	The Entity has disclosed its Biodiversity-related performance in its 2022 Sustainability Report, page 26: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf
8.3 Alien Species	Minor Non-Conformance	The Biodiversity risk assessment does not cover Alien Species to proactively prevent accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. In routine practices, fumigation of wooden packaging both inbound and outbound is undertaken as per international standards as one of potential source of transmitting invasive 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 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	The Entity has developed an employee handbook as well as a summary (Employee Relations Statement) signed by Group Chief Human Resources Officer (CHRO), indicating a commitment to respect local laws and UN Declarations and ILO conventions on Human Rights and employment practices. The above policies are communicated to each direct employee at the time of hiring/induction and are made available on intranet, and are accessible to all employees.
9.1b Human Rights Due Diligence (process)	Conformance	The Human Rights Due Diligence is undertaken as part of enterprise risk management following a systematic approach (i.e. mapping, analysis, assessment criteria and action plan and reference risk). One of the South Africa specific Human Rights risks identified includes potential race-related Discrimination. The mitigation measures include the implementation of national laws relating to Broad-Based Black Economic Empowerment (B-BBEE) and submission of progress reports to authorities. The

CRITERION	RATING	COMMENT
		Entity also has implemented a non-discrimination policy for hiring, training and promotion.
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The remedial measures for identified Human Rights risks are implemented. For example, to address the Local Communities' rights associated with heavy truck movements and the impact on road conditions, the Entity has implemented action relating to infrastructure support. This was confirmed during the site visit and via community consultation.</p> <p>One of the South Africa specific Human Rights risks identified includes potential Discrimination against black persons. The mitigation measures include the implementation of national laws relating to Broad-Based Black Economic Empowerment (B-BBEE) and submission of progress reports to authorities.</p> <p>The Entity's contract with the labour agency is detailed and vetted by the legal department to avoid potential Human Rights violations.</p>
9.2 Women's Rights	Conformance	<p>The Entity considers itself as gender neutral and respects women as per the male employees. However, there are some specific benefits provided to women employees including maternity leave of 12 weeks plus three months entitlement for nursing breaks. It is also covered in the Collective Bargaining Agreement (CBA).</p> <p>There is Group level policy on anti-Harassment which is communicated to employees and deployed through training, poster and emails. The International Women's Day is celebrated and supporting photographs were available and was confirmed in workers interviews. The Entity's diversity and inclusion performance is reported in the Sustainability Report, page 21: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf</p>
9.3 Indigenous Peoples	Not Applicable	Whilst there are Indigenous groups in both Nigeria and South Africa, this Criterion is not applicable as there are no Indigenous Peoples in the regions where the Entity's operations are located.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Whilst there are Indigenous groups in both Nigeria and South Africa, this Criterion is not applicable as there are no Indigenous Peoples in the regions where the Entity's operations are located.

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Conformance	There are no cultural or scared heritage sites in nearby areas which was confirmed via data research https://whc.unesco.org/en/statesparties/ng As per these data, the nearest heritage site to any of the Entity's Facilities is over 90 kilometres from the Aba site. (A Juju Slave Route feature).
9.6a Resettlements (avoid or minimise)	Conformance	The Entity's Agbara and South African sites operate in a government managed Industrial Park. There is no resettlement caused due to setting up business activity by GZ Industries. In case of the Aba site, the land was purchased from an individual owner as an agricultural land use and no resettlement was required.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity as no resettlement was required.
9.7a Local Communities (rights and interests)	Conformance	The Entity has an ongoing commitment to supporting Local Communities https://www.gzican.com/social-impact/ and has disclosed its related performance in the Sustainability Report, pages 31-34: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf Note: The community near the Aba site could not be visited during the site audit due to a security threat. However, many Workers originate from this local community and provided feedback on impacts and livelihoods.
9.7b Local Communities (impacts)	Conformance	The audit team visited the two Local Communities associated with the Agbara site. Many of the Workers belongs to the Local Community and hence contribute to their livelihood. There are some impacts including high vehicle movement as part of the business activities. The Entity has implemented mitigation measures such as construction of the road passing through the community. This has already been completed for the Agbara site and is under construction for Aba. The other possible noise impacts are mitigated by enclosing noisy activities and operations. The ambient noise and ambient air quality is also monitored periodically to confirm that it does not violate local requirements.
9.7c Local Communities (livelihoods)	Conformance	The Entity works with the community in several areas such as education, youth employment, medical camps, and drinking water facilities as per needs of the local community. In South Africa, there is an

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		<p>initiative called 'YES-Youth Employment Service' and others, as discussed in the Sustainability Report, page 33: https://gzican.com/wp-content/uploads/2023/05/2022_GZI_Sustainability_Report.pdf</p> <p>Many of the Workers are members of the Local Community and hence contribute to their livelihood. The details about social impact are disclosed in the Sustainability Report, page 33. Other related information is available at: https://gzican.com/social-impact/</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity has made a commitment in its Responsible Sourcing Policy not to contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). Currently, its suppliers are not located in conflict-affected areas and are assessed using available sources of information. Whilst there are CAHRAs in Nigeria, these are all in the north-east of the country.</p>
9.9 Security practice	Conformance	<p>The Entity has assessed its security practices and security threat considering the local conditions in Nigeria. It has been comprehensively reviewed with senior leadership and the Entity monitors effective implementation on a weekly basis. The Entity's security team work closely with local police and military personnel to safeguard and protect GZI employees, Workers, Visitors, customers and property. There have been no major security incidents reported.</p> <p>The Entity uses an external security agency in both Nigeria (armed), who have deployed male and female security guards and in South Africa (un-armed). Security personnel have been trained on company security policies, human rights, threat prevention and response. It was also confirmed during the interview with security personnel.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>Trade unions have presence at the Entity's sites and are national level and registered. During the worker interviews it was confirmed that membership is voluntary. Employees are free to choose membership or not. The membership fee each month is deducted by the Entity from employees' salary and deposited into the trade union's accounts. In South Africa, there is a written recognition agreement between GZI and National Union of Metal</p>

CRITERION	RATING	COMMENT
		Workers of South Africa (NUMSA). In Nigeria, there are two trade unions with presence on site.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Collective Bargaining Agreement is jointly signed by company management and union representatives. In case of South Africa, additionally, there is a national level council representing employers such as the Entity, the 'Metal and Engineering Industries Bargaining Council (MEIBC)' who have signed collective agreement with NUMSA and other trade unions and act as a guidelines. Further information is available at: https://www.meibc.co.za/images/pdf/agreements/2022/MainCollectingAgreement .pdf
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as the Entity does not operate in a country (Nigeria and South Africa) where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	As part of the Entity's Human Rights Policy, the age verification is part of hiring process and recorded as part of employment records. It has been checked during random check of employment records and found all the employees including contract Workers are above the 18 years of age. Additionally, during the site visit, there were no suspected case of underage Workers.
10.2b Child Labour (hazardous)	Conformance	The Entity is not engaged in, nor supports Hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Entity is not engaged in, nor supports the Worst Forms of Child Labour in its business activities.
10.3a Forced Labour (human trafficking)	Conformance	A random check of employment records and Worker interviews did not identify any sign or existence of Forced Labour including Human Trafficking. In both Nigeria and South Africa, there are certain foreign nationalities such as India and Ghana at management level and there is no sign of Forced Labour or passport retention. The Entity is not engaged in nor supports Human Trafficking either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	There is no practice of keeping deposits, recruitment fees or equipment advances from Workers either directly or through employment or recruitment agencies.

CRITERION	RATING	COMMENT
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to lodge deposits or security payments at any time during their employment period.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour, neither direct nor through recognised labour agencies. Neither deposits nor security payments are required.
10.3e Forced Labour (freedom of movement)	Conformance	There is no restriction of movement at the Entity's workplace.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	There is no retention of original documents of Workers, only copies of original documents are held.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length as mutually agreed in the employment contract.
10.4 Non-Discrimination	Conformance	There is no Discrimination in the hiring, training and promotion as found during review of related documents. There are various nationalities working in both the Nigeria and South Africa sites.
10.5 Communication and engagement	Conformance	There are several programs to engage employees (e.g periodic meetings, town hall, trainings, team day out) which was confirmed during employees' interview. There is detailed annual training comprising of technical, leadership, and expatriate skill transfer.
10.6 Disciplinary practices	Conformance	There are written rules of disciplinary actions which prohibits corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. The employees understanding of disciplinary rules was checked during interviews and found to be satisfactory.
10.7a Remuneration (living wage)	Conformance	The Entity pays wages equal to and/or above the legal minimum wages to meet the basic needs and to provide for some discretionary income.
10.7b Remuneration (method of payment)	Conformance	The Entity pays wages through bank transfers on a monthly basis.
10.8 Working Time	Conformance	The working hours are recorded through a biometric attendance system. The Entity has shift work and Working Time and Overtime (as applicable) are recorded and analysed. The shift schedule is effectively communicated.

CRITERION	RATING	COMMENT
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has established a Health and Safety Policy: https://gzican.com/certifications-and-policies/ Training and communication on safety Policies is provided to employees and visitors. Senior management has endorsed the Policy and provides the necessary commitment and resources to implement its provisions.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Health and Safety Policy has been developed and applies to all Workers and Visitors present in any area or activities under the Entity's control: https://gzican.com/certifications-and-policies/
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Health and Safety Policy has been developed with a commitment to comply with Applicable Law on Workers' health and safety, international standards, and international conventions on Occupational Health and Safety: https://gzican.com/certifications-and-policies/
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Health and Safety Policy has been developed to provide for Workers' right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Minor Non-Conformance	The Entity's OH&S Management System comprises of documented operating procedures, training and the management of First Aid Rooms. The Entity is certified to ISO 45001:2018: https://gzican.com/wp-content/uploads/2021/05/Agbara-ISO45001-Exp.-05-2024.pdf https://gzican.com/wp-content/uploads/2021/05/Aba-ISO45001-Exp.-05-2024.pdf https://gzican.com/wp-content/uploads/2021/03/IQNet_40602641-OHS18_EN.pdf During the site visits and a review of related documents, effective implementation of OH&S was determined as weak with isolated observations of inadequate operational controls relating to chemical management at the South African site.
11.3 Employee engagement on health and safety	Conformance	Employees are given training on safety topics as per training needs identification and the annual training plan. Training topics include chemical management and personnel protective equipment (PPE).

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	The Entity has a practice of monthly analysis of OH&S performance, known as a Safety and Behavioural Observation (SBO). The OH&S performance data include indicators such as first aid cases and lost time injury, and these are displayed within the Entity's premises.

Document Control and Version History

Revision	Date	Notes
0	21 July 2023	Certification Audit – Full Certification