

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Midal Cables B.S.C. (C)

CERTIFICATE NUMBER
430

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
CETIZION VERIFICA

DATE OF ISSUE
24 DECEMBER 2024

DATE OF EXPIRY
23 DECEMBER 2027

CERTIFIED SINCE
24 DECEMBER 2024

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*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

Design, manufacture and export of
Aluminium rods, wires and
conductors at the Midal Cables
Facility, Kingdom of Bahrain.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Midal Cables
ENTITY NAME	Midal Cables B.S.C. (C)
CERTIFICATION SCOPE	Design, manufacture and export of Aluminium rods, wires and conductors at the Midal Cables Facility, Kingdom of Bahrain.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial ConversionOther Manufacturing or sale of products containing Aluminium
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none">25 – 28 November 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">12 December 2024
AUDIT SCOPE	<p>The Audit Scope included the design, manufacture and export of Aluminium rods, wires and conductors at the Midal Cables Facility, Kingdom of Bahrain.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial ConversionOther Manufacturing or sale of products containing Aluminium <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.

-
- ☑ 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 24 December 2024 – 23 December 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 23 December 2025

CERTIFICATE NUMBER 430



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Midal Cables B.S.C. (C) ('the Entity'), which commenced operations in 1977, is a manufacturer and exporter of Aluminium wires, rods and conductors for varied industrial applications. The Entity has five casting lines with capacity ranges of 75 to 180 tonnes per day. The Entity has a production capacity of 260,000 tonnes per annum of wire, rod and conductors in sizes from 9.5 mm to 15 mm diameters.

The Entity is located within the Askar Industrial Area and Liquid Aluminium is sourced from the adjacent Aluminium Bahrain (Alba) smelter. The hot Dross processing facility located within the premises is operated by an external agency. The Entity is focused on increasing its renewable energy capacity with the installation of roof top solar photovoltaics.

The nearest airport to the Entity is the Bahrain International Airport at Muharraq, approximately 29 kilometres away, and the Entity is well connected by road and to the nearest seaport. The Entity currently has over 800 employees and the key external Stakeholders include the Supreme Council for the Environment and the Ministry of Labor.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of Systems, Residual Risk and Performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	Medium	Low	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Low	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity maintains a list of applicable legal permits. The Entity also maintains a documented Compliance checklist, covering the terms and conditions of legal permits. The respective department manager is responsible for implementation.</p> <p>The Entity conducts an annual corporate governance audit against Compliance with their Corporate Governance Code.</p> <p>The Chief Commercial Officer has been designated as the Corporate Governance Officer (CGO). Legal Compliance is included on the periodic Board of Directors' meeting agenda.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has developed an Anti-Corruption and Anti-Bribery Policy and has conducted a risk assessment to identify and mitigate the associated risks.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has developed a Code of Business Ethics, which is published in both Arabic and English. The Code addresses issues such as Child Labour and Forced Labour. Workers are trained in the Code during their inductions, and adherence to the Code is a condition of employment contracts.</p> <p>The Code of Business Ethics is accessible at: https://drive.google.com/file/d/15DrJELE0Gq6MYRIT6TUX8rMwYn2FDksj/view</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has developed Policies consistent with Environmental, Social and Governance (ESG) practices. The Policies and management approach to address and implement ESG topics have been described in the Entity's 2023 Sustainability Report, accessible at: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIudqEWMJfuO/view</p>
2.2a-c Leadership	Conformance	<p>The Entity has designated a senior manager to oversee the effective implementation of the Aluminium Stewardship Initiative (ASI) Performance Standard requirements.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has developed an Environment Management System including Policies, procedures, internal monitoring and other practices. The Entity's Management System is certified against the ISO 14001:2015 standard.</p>
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	<p>The Entity has developed a Social Management System including Policies, procedures, internal monitoring and other practices. The Social Management System is in conformance with Applicable Law including Labour Law.</p> <p>The Entity has a documented practice within its Social Management System to audit labour Contractors every two years against conformance with contracting obligations and Applicable Law regarding social security, government medicals, Personal Protective Equipment (PPE), transport, sick leave, and annual leave.</p>

CRITERION	RATING	COMMENT
		However, the Entity's monitoring of the Social Management System implementation, including the audit of labour Contractors was insufficient, and did not meet the Entity's prescribed checklist.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed a Supplier Code of Conduct and associated procedures for the ongoing monitoring of supplier compliance. The Entity implements a supplier Due Diligence practice through an external agency. The Entity's Social Responsibility Policy is disclosed at: https://drive.google.com/file/d/18u24BtKAqJ6SWwzDaEprMHZ0PLUxdjd-/view</p> <p>The Entity has engaged its supplier of Liquid Aluminium regarding its supply chain Due Diligence process; the supplier confirmed that no Conflict-Affected and High-Risk Areas (CAHRAs) are present in the supply chain, and that they are in conformance with the OECD Due Diligence guidance. The Entity's Liquid Aluminium supplier is certified against the ASI Performance Standard.</p> <p>Further information on the Entity's responsible sourcing practices is available in the Entity's Sustainability Report, page 60: https://drive.google.com/file/d/1wUzftJIBIdnphVNxf_a2ZIUdqEWMJfuO/view</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to the existing Facility.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to the existing Facility.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed an Emergency Preparedness and Response Plan (EPRP). The EPRP includes emergency scenarios such as molten metal spills, gas leaks, fire and flooding. The Entity has conducted annual emergency drills. The Entity's EPRP is audited periodically as part of their ISO 45001 certification. The Entity's EPRP is available at Stakeholder request.</p> <p>Further information on the Entity's EPRP is available in the Sustainability Report, page 45: https://drive.google.com/file/d/1wUzftJIBIdnphVNxf_a2ZIUdqEWMJfuO/view</p>
2.8a-d Suspended Operations	Conformance	The Entity has developed a Policy on suspended operations which takes into account Material adverse environmental, social and governance impacts. The Entity conducts periodic reviews of their Business resilience plan.
2.9a-b Mergers and Acquisitions	Conformance	The Entity's sustainability related Policies consider mergers and acquisitions, with a requirement to review environmental, social and governance impacts. There have been no mergers and acquisitions since the Entity became an ASI Member, and none are currently planned.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity's sustainability related Policies consider closure, decommissioning and divestment, with a requirement to review environmental, social and governance impacts. There has been no

CRITERION	RATING	COMMENT
		closure, decommissioning or divestment since the Entity became an ASI Member, and none are currently planned.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has publicly disclosed its governance approach and ESG impacts in the Midal Cables Company's consolidated 2023 Sustainability Report. The Report follows the Global Reporting Initiative (GRI) guidelines and addresses the disclosure requirements associated with the ASI Performance Standard v3.</p> <p>The 2023 Sustainability Report is accessible at: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p>
3.2 Non-compliance and Liabilities	Conformance	<p>There are currently no Material fines, judgments, penalties or non-monetary sanctions against the Entity for failure to comply with Applicable Laws. The governance related disclosures are included in the Sustainability Report, pages 56-57: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity makes payments to governments for legitimate purposes only, such as value added tax and corporate tax, in accordance with the Kingdom of Bahrain's tax regime; these payments were reviewed during the Audit. The related disclosures are made in the governance section of the Entity's Sustainability Report, pages 56-57: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	<p>The Entity has implemented grievance handling Policies. Creating awareness of these Policies is achieved through employee induction training and periodic Stakeholder engagement. Stakeholders can raise a grievance through various means, such as the dedicated email whistleblower@midalcable.com or via the Entity's website. There are no current Stakeholder grievances for the last year.</p> <p>Grievance disclosures are made in the Entity's Sustainability Report, page 64: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p> <p>However, interviews with contract Workers identified that their awareness of the Entity's Grievance Mechanism was not satisfactory.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has conducted Life Cycle Assessments (LCAs) of its major products, such as Aluminium alloy rods. The LCA conducted for the alloy rods evaluates the environmental impacts of one tonne of product from cradle-to-gate and considers the principles in the ISO 14040:2006 and ISO 14044:2006 standards.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>LCAs specific to products produced within the Audit Scope are available to customers on request. The Entity has made LCA related disclosures in its Sustainability Report, pages 35 - 56:</p>

CRITERION	RATING	COMMENT
		https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view
4.2 Product Design	Conformance	The Entity has implemented processes to ensure sustainability criteria are considered during the Product design phase. For example, a newly designed conductor utilising ultra-high conductivity alloys was developed to have improved sustainability aspects such as a reduction in transmission line energy losses. The related disclosures are made in the Entity's Sustainability Report, pages 58-59: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view
4.3a-b Aluminium Process Scrap	Conformance	The Entity collects Aluminium Process Scrap according to material grade. Scrap is stored and labelled with a bar code, and the Entity maintains a monthly inventory. The Entity has a target to remelt and reuse 100% of its Process Scrap. There is one bailing press and bundles are labelled.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has developed a recycling strategy, which is disclosed in the Sustainability Report: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view The Entity makes efforts to identify and purchase Post-Consumer Scrap from Gulf Cooperation Council (GCC) markets, through buy-back arrangements with customers and other means.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is working within regional forums to promote the collection and recycling of products at End of Life, to promote the circular economy, decarbonization and the energy transition. For example, the company participated in GCC Power 2024 as an exhibitor. The Entity is a member of the Gulf Aluminium Council (GAC) and participates in related recycling activities. Further information is available at: https://gulfaluminium.ae/environment
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has calculated its Material Greenhouse Gas (GHG) Emissions, including Scope 1 and Scope 2 emissions, and Scope 3 (Category 1) emissions for the purchase of Liquid Aluminium. The GHG Emissions data are externally verified and disclosed in the 2023 Sustainability Report, pages 9 and 30-33, which is accessible at: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan and a GHG Emissions Reduction Pathway in accordance with the ASI endorsed methodology. The Entity's Pathway is based on a 2023 baseline and includes Intermediate Targets for 2028 and 2030 for Scope 1 and 2 emissions, and separate targets for Scope 3 (Category 1) emissions. The related disclosures are included in the 2023 Sustainability Report, page 31:</p> <p>https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has developed and maintained GHG Emission reduction related Policies, targets, and implementation guidelines. The Entity is working on their GHG Emissions Reduction Plan primarily focussing on working with the adjacent smelter to receive low carbon Liquid Aluminium, a higher use of renewable energy primarily from roof top solar plant, and sourcing higher quantities of Post-Consumer Scrap within required product quality characteristics.</p>

6. EMISSIONS, EFFLUENTS AND WASTE

6.1a-f Emissions to Air	Conformance	<p>The Entity has a valid environmental permit, issued by the Supreme Council of Environment (SCE) of Bahrain, which addresses environmental aspects including Emissions to Air. The Entity conducts quarterly stack emissions monitoring for air pollutants including Sulphur Oxides (SOx), Nitrous Oxides (NOx) and Suspended Particulate Matter (SPM), in Compliance with Applicable Laws. Monitoring results confirmed that the Entity's air emissions levels are within the legal permissible limits. Ambient air emissions monitoring has been undertaken and the Entity has committed to installing a fugitive emissions monitoring station by early 2025.</p> <p>The related disclosures are made in the Entity's Sustainability Report, page 40:</p> <p>https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity discharges wastewater from the Reverse Osmosis (RO) plants through injection to groundwater via two borewells, one for each RO plant. Flow meters are installed to measure the quantity of wastewater injected. Wastewater quality is tested by an external agency monthly. All parameters are within legally permissible limits.</p> <p>The related disclosures are made in the Entity's Sustainability Report, page 39:</p> <p>https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented an ISO 14001 certified Environmental Management System, which addresses Spills and Leakages including chemical discharge to water. A risk assessment has been undertaken and the results are communicated to users through the Management System documentation available on the Entity's intranet.</p> <p>The Entity conducted a recent environmental emergency drill covering major Leakages and Spills. The Entity implements various monitoring and control programs related to Spills and Leakages including daily safety observations by the Safety Officer, a weekly safety walk-through by Safety Committee members and use of internal safety discussion platforms.</p>

CRITERION	RATING	COMMENT
		The related disclosures are made in the Sustainability Report, page 37: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity makes public disclosures on Spills and Leakages in their annual Sustainability Report, page 37: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view There were no cases of Spills or Leakages during the reporting period.
6.5a-c Waste Management and Reporting	Conformance	The Entity collects, segregates, and suitably stores its Hazardous and Non-Hazardous Wastes. All Waste is linked to documentation such as an internal gate pass for internal Waste processing or a manifest for disposal by an external agency. A Waste inventory is submitted annually to local authorities (the SCE). The Entity has developed a Waste management plan with a focus on Waste efficiency, recovery, waste reduction at source and prevention of landfilling. Data on the quantity of Hazardous and Non-Hazardous Waste is disclosed in the Sustainability Report, pages 35-36: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity carries out hot Dross processing within the premises, operated by external ASI Certified Entity (https://aluminium-stewardship.org/about-asi/members/TAHA-International-B-V-). The quantities of Dross generated and processed as well as Aluminium recovered are recorded for each batch. The depleted Dross is temporarily stored before being sent for further processing by the external agency for use in different industrial applications. The depleted Dross does not go to landfill.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has developed a site water balance. The main source of water is from two groundwater bores and potable water delivered by tanker from an external agency. The process wastewater (RO plant reject water) is injected back into groundwater in conformance with SCE guidelines. Total water consumption is recorded on a monthly basis for each water source. The related disclosures are made in the Entity's Sustainability Report, page 38 - 39: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view
7.2a-e Water Management	Minor Non-Conformance	The Entity has developed a water management plan to improve their water footprint in response to the water related risks identified. The Entity has implemented projects such as the second stage RO system to reduce water usage. The Entity has set an internal target of 50%

CRITERION	RATING	COMMENT
		<p>reduction in reject water discharge. Affected Community members are consulted on water management related topics. The Entity has made water management related disclosures in their Sustainability Report, page 38 - 39: https://drive.google.com/file/d/1wUzftJIBIdnphVNxf_a2ZIUdqEWMJfuO/view</p> <p>The Entity has not publicly disclosed a definitive water management plan that includes information such as time-bound water use reduction targets.</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has conducted a Biodiversity assessment using the Integrated Biodiversity Assessment Tool (IBAT) tool to consider potential impacts within the Entity's Area of Influence as well as the wider country context. There are no endangered species identified against the International Union for Conservation of Nature (IUCN) Red List of Threatened species, no Protected Areas, and no sensitive flora or fauna in close proximity to the Facility. The assessment concluded that the Entity has an overall low impact. The related disclosures are made in the Entity's Sustainability Report, page 41: https://drive.google.com/file/d/1wUzftJIBIdnphVNxf_a2ZIUdqEWMJfuO/view</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risk assessment determined there are no risks to Biodiversity and Priority Ecosystem Services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risk assessment determined there are no risks to Biodiversity and Priority Ecosystem Services.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity risk assessment determined there are no risks to Biodiversity and Priority Ecosystem Services.
8.4 Alien Species	Conformance	The Entity has implemented measures to prevent the introduction of Alien Species. For example, wooden pallets are fumigated in accordance with the International Standards for Phytosanitary Measures (ISPM) standard, received from the group company Madem Gulf Industries W.L.L, Kingdom of Bahrain.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has expressed a commitment to a "No Go" in World Heritage Properties' principle and developed relevant Policies and disclosures. There are no future expansion plans which will negatively affect World Heritage Properties.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as the Biodiversity assessment determined there are no Protected Areas nearby or within the Entity's Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has conducted a Human Rights Due Diligence process covering the entire value chain, including the supply chain, employees, contract workers and communities. The Entity has implemented gender responsive Policies in response to the Due-Diligence outcomes. The Entity's has implemented a supplier onboarding process to address Human Rights conditions and other issues such as quality, environment and safety.</p> <p>A detailed Human Rights risk assessment has been developed that covers all the affected Stakeholders. The related disclosures are made in the Entity's Sustainability Report, page 24: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity promotes women's employment and gender equity. Currently 4.2% of the workforce are women from four nationalities (Bahrain, India, Iraq and Philippines). The Entity has implemented a plan to increase women's employment. The gender diversity disclosures are made in the Entity's Sustainability Report page 50 - 53: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p> <p>The Entity has not publicly disclosed the effectiveness of the measures taken to promote gender equity on an annual basis against targets.</p>
9.3a-i Indigenous Peoples	Conformance	<p>The Entity has engaged with the Indigenous community, that is the local community of native origin including citizens of Bahrain, as part of their corporate social responsibility commitment. There have been no circumstances where Indigenous Peoples or persons of native country nationality have been displaced.</p> <p>The related disclosures are made in the Entity' Sustainability Report, page 49: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the Entity joined ASI.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the Entity joined ASI.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has assessed for the presence of cultural and heritage sites. The Entity has not identified any cultural or heritage sites or values in close proximity to the Facility or that are negatively affected by the Entity's activities. For reference, heritage sites in Bahrain can be viewed

CRITERION	RATING	COMMENT
		at: https://www.worldatlas.com/articles/unesco-world-heritage-sites-in-bahrain.html and at: https://whc.unesco.org/en/statesparties/bh
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as the Entity’s business activities are not in proximity to identified UNESCO cultural and heritage sites, and the activities are not adversely impacting on cultural, historical or spiritual heritage that is essential to the identity of Indigenous Peoples.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as the Entity is located within an industrial zone and no displacement has occurred to date.
9.7a-h Affected Populations and Organisations	Conformance	The Entity works with and engages the Affected Community as part of its corporate social responsibility. The Entity’s major contributions are in education and in the construction of a community centre in the Al Jasra area. The related disclosures are made in the Entity’s Sustainability Report: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has developed a Supplier Code of Conduct, which addresses the requirements regarding CAHRAs in accordance with OECD Due Diligence guidelines and the Entity’s Social Responsibility Policy and associated procedures for supply chain Due Diligence.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has conducted a supply chain risk assessment including specific assessment of its Aluminium supply chain. The Entity consulted with its sole Primary Aluminium (Liquid Aluminium) supplier. This supplier is an ASI Certified Entity against the Performance Standard v3. The supplier has communicated to the Entity the absence of CAHRAs in its upstream Aluminium supply chain.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity has developed a strategy and contingency plan to respond to supply chain risk within its Aluminium supply chain, which involves consultation with the Entity’s Primary Aluminium supplier.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity’s Due Diligence practices have been audited as part of this ASI Performance Standard v3 Audit.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity has assessed their supply chain risk and determined that there are no current risks related to CAHRA. The Entity has disclosed information on its supply chain Due Diligence in the 2023 Sustainability Report, pages 7 and 11 – 60: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view
9.9 Security practice	Conformance	The Entity has an agreement with an external security provider and hires un-armed security guards from an external agency. The Entity has provided Human Rights training to security personnel in response to Human Rights risks identified in their Due-Diligence process. Interviews with security personnel confirmed that the necessary training on their role, health and safety regulations, visitor management, and emergency response has been provided.

CRITERION	RATING	COMMENT
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity respects their Workers' right to Freedom of Association and to join or not to join a Trade Union. The Workers in coordination with General Federation of Workers Trade Unions in Bahrain (GFBWTU) have organised and completed a Trade Union election process, in accordance with Bahrain's Labour Law, and the Midal Trade Union is registered to the Entity. The term of each Worker representative is four years. Periodic meetings between management and Trade Union members are held on a needs basis and are both formal and informal depending upon the nature of topics.</p> <p>There is no collective agreement between the Trade Union and management. Union governance including financial management is governed by Trade Union rules.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as the labour laws in Bahrain do not restrict the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	The Entity does not employ Child Labour, in accordance with their Human Resources Policy - recruitment and induction. The minimum age for employment is 18 years. Bahraini Labour Law does permit the employment of juveniles (15-18 years) and prohibits hiring anyone less than 15 years of age; the Entity does not at present employ juvenile Workers.
10.3a-c Forced Labour	Conformance	<p>The Entity has implemented its Human Resources Policy and does not use Forced Labour, nor undertaken modern slavery practices. The review of documents during the Audit confirmed that the Entity has not kept any original documents of Workers' identification including passports, cash deposits, or engaged in other practices linked to Forced Labour. The Entity has publicly disclosed a Modern Slavery Statement, endorsed by the group CEO, indicating the Entity's commitment and actions taken to prevent modern slavery. The Statement is accessible on the Entity's website at:</p> <p>https://drive.google.com/file/d/1trNEb_-GSSl6NrETaqGtYh7teS8V_E2V/view</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has defined a policy commitment to Non-Discrimination with regards to hiring, promotion, training and benefits. During Worker interviews and a review of training and promotion records, no evidence of Discrimination was identified. Pay equity is specifically considered in employees' annual performance appraisals.</p> <p>The related disclosures are made in the Entity's Sustainability Report, page 51:</p> <p>https://drive.google.com/file/d/1wUzftJIBdnphVNxf_a2ZIudqEWMJfuO/view</p>
10.5 Communication and engagement	Conformance	The Entity engages employees on workplace matters and employees are comfortable to raise concerns. This engagement was confirmed during Worker interviews.

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established a policy to prevent Violence and Harassment as part of their Code of Business Ethics, which is accessible at: https://drive.google.com/file/d/1GklIG90EqqfDN43pOLJP6f2hSIQVgN4I/view</p> <p>Related training is provided during Worker inductions and refreshers. There were no cases of Violence or Harassment currently identified. Any reported case will be dealt with in accordance with the Entity's grievance handling procedures.</p>
10.7a-c Remuneration	Conformance	<p>The Entity has defined a remuneration policy as part of their Human Resources Policy and Code of Business Ethics, in conformance with Bahraini Labour Law. Overtime is paid at a premium rate and is in accordance with the Applicable Law. The Workers' salaries are paid monthly entirely through bank transfer. A wage slip is sent to the employee's email address.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>The Entity has defined a working hours policy as part of their Human Resources Policy and Code of Business Ethics, which is in conformance with Bahrain's Labour Laws.</p> <p>The Entity employs a biometric (finger, face) recognition system for recording working hours. During the Audit, working hours were checked for randomly selected employees both male and female, permanent and contractor across functions for three months.</p> <p>However, it was identified during the Audit that some Workers had worked hours in excess of that within the Entity's working hours policy and related laws. Additionally, no systematic root cause was identified for the exceedance of working hours.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs Workers of their rights through induction training, refresher training and other employment engagement activity. This was confirmed during the documentation review and Worker interviews. The Entity has provided some handbooks to cover health and safety rules and Worker rights, available in both English and Arabic. The Workers have a right to refuse to work under unsafe conditions.</p>

11. OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has implemented an Occupational Health and Safety (OH&S) Management System, which is certified against ISO 45001:2018. The most recent external ISO audit identified minor non-conformities which have since been corrected. The certificate is available on the Entity's website at: https://drive.google.com/file/d/1D9uXbtI6A8phaMrKsR7yUt5B3Ai7WVZV/view</p> <p>The Entity has developed Standard Operating Procedures (SOPs). Work instructions are documented and made available at the place of use. The Entity has conducted a hazard identification and risk assessment across departments and activities. The Entity has a Safety Committee with members who are consulted, including Trade Union members. Personal Protective Equipment (PPE) is provided in accordance with identified health and safety risks, and is provided free of cost and periodically replaced.</p>
---	-----------------------	---

CRITERION	RATING	COMMENT
		However, it was identified during the Audit that the activity of unloading diesel from the tankers to underground tanks is not covered under the hazard identification and risk assessment; some required safety measures are not adequately implemented, such as removal of static charges, availability of safety data sheets, and a prohibition on the use of mobile phones in the area.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity conducts a six-monthly management review of OH&S performance, chaired by the Group CEO. The review considers safety performance in terms of lagging and leading indicators such as:</p> <ol style="list-style-type: none"> 1. Lost time injury frequency rate 2. Number of ill health cases 3. Number of fire notifications 4. Number of permits to work issued: 5. Number of first aid cases reported in OHC 6. Number of near misses 7. Numbers of safety training hours <p>The Entity has an excel based OH&S Key Performance Indicators (KPIs) tracking system, which is updated monthly. In addition, OH&S KPIs are part of the Entity's objective and goals. Benchmarking against peers has been completed internally using global data following the OH&S assessments. The related disclosures are made in the Entity's Sustainability Report, pages 44 - 46: https://drive.google.com/file/d/1wUzftJIBIdnphVNXf_a2ZIUdqEWMJfuO/view</p> <p>The Entity has not publicly disclosed the effectiveness of the OH&S System including the comparative analyses of OH&S performance with peer Businesses and leading practice.</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has developed an employee engagement plan on Health and Safety that includes training and a 'safety week' celebration.</p> <p>Heat stress and heat stroke topics are included in each training for the June to September months. The training plan developed for each month and training records are maintained and verified.</p>

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	24 December 2024	Initial Certification Audit – Full Certification