

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Hulamin Operations (Pty) Limited: Hulamin Rolled Products

CERTIFICATE NUMBER
405

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

DATE OF ISSUE
10 APRIL 2025

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION**

DATE OF EXPIRY
9 APRIL 2026

ASI ACCREDITED
AUDITING FIRM
**TÜV RHEINLAND CERT
GmbH**

CERTIFIED SINCE
10 APRIL 2025

AUTHORISED BY

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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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

Richards Bay Casthouse (Facility 1)
for the production of ingots and
Pietermaritzburg Rolled Products
(Facility 2) from the Hulamin Rolled
Products Division for the production
of Aluminium pigs and ingots into
semi-fabricated products located
in South Africa.

* Provisional Certification is valid
for the period of one year, during
which the company can address
the non-conformances assessed
and subsequently seek full
certification.

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Hulamin Operations (Pty) Limited
ENTITY NAME	Hulamin Operations (Pty) Limited: Hulamin Rolled Products
CERTIFICATION SCOPE	Richards Bay Casthouse (Facility 1) for the production of ingots and Pietermaritzburg Rolled Products (Facility 2) from the Hulamin Rolled Products Division for the production of Aluminium pigs and ingots into semi-fabricated products located in South Africa.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
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">3 – 7 June 2024
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">11 October 2024
AUDIT SCOPE	<p>The Audit Scope included the Richards Bay Casthouse (Facility 1) for the production of ingots and Pietermaritzburg Rolled Products (Facility 2) from the Hulamin Rolled Products Division for the production of Aluminium pigs and ingots into semi-fabricated products.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion <p>All applicable 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.

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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	10 April 2025 – 9 April 2026
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	9 October 2025
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CERTIFICATE NUMBER	405
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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

Hulamin Limited was established in 1940 as Hulett Aluminium and was registered on the South African Johannesburg Stock Exchange (JSE) in 2007. Hulamin Limited specialises in converting Primary Aluminium into semi-fabricated products, catering to various sectors, including packaging, engineering, automotive, and construction. Hulamin Limited has three registered businesses, including the 'Entity', Hulamin Rolled Products. The Entity includes a casthouse located in Richards Bay, KwaZulu-Natal province and the re-melting and recycling facilities, direct-chill ingot casting, hot rolling, cold rolling and foil rolling mills and further finishing processing lines at the Pietermaritzburg, KwaZulu-Natal province site.

The Entity produces a range of rolled products such as technologically sophisticated sheet, coil, and plate products that focus on high-quality, tight tolerance, and complex products. Production facility capacity is approximately 200,000 tonnes per annum. Over 50% of sales are destined for the local South African market, with the remainder exported to approximately 50 countries.

The Entity currently has approximately 1,500 employees, including over 360 women employees.

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	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
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.
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms. Anti-Corruption is embedded in the Hulammin Group's processes. The Entity confirmed that the Group is 'committed to the highest standards of integrity and accountability'. The Entity's Conflict of Interest and Gift Policy for employees, Code of Ethics and the Whistleblowing Policy, together prohibit fraud, Bribery and Corruption of any form, and requires the Entity to comply with Applicable Laws wherever they conduct business. The Entity has established its own Company Secretary that oversees Compliance with anti-Corruption rules. Suppliers are required to accept the Entity's minimum supplier requirements related to sustainability and business conduct.</p> <p>Further information regarding business ethics is available at: https://www.hulamin.com/about/corporate/corporate-compliance-policies</p>
1.3a-e Code of Conduct	Conformance	<p>The Hulammin Group's Code of Business Conduct and Code of Ethics applies to the Entity. The Codes are publicly available at: https://www.hulamin.com/downloads</p> <p>The Code of Ethics covers principles such as Compliance with laws and regulations, conflict of interest, employment equity, safety, health and environmental responsibility, political contributions, safeguarding of funds and assets, protection and use of property, business controls, the integrity of qualitative and quantitative information, dealing with outside persona and organisations, privacy and confidentiality as well as dealing with implementation and contraventions to the Code.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Environmental, Social, and Governance (ESG) related Policies and procedures have been implemented and reviewed and were verified during the Audit. These include the Code of Ethics, Conflict of Interest and Gift Policy, and Code of Conduct for Suppliers and Service Providers.</p> <p>These Policies are supported by Management Systems that oversee their implementation and are endorsed by the Board, with the Entity's executive responsible for overall implementation. The Policies are communicated through the annual general induction. A risk assessment is used to identify areas where Policies may need periodic strengthening or modification.</p> <p>The Policies assist in improving relationships with customers, employees, the industry, and regulatory authorities. They are communicated to all employees and promoted through the website, the Aluminate Magazine, and on screens in 'green areas'.</p>

CRITERION	RATING	COMMENT
2.2a-c Leadership	Conformance	Supported by the Chairperson of the Board, the Entity has ensured that Policies are established and implemented. These Policies are developed, endorsed by the Entity's senior leadership, and reviewed as required, and considers issues and changes affecting the Entity.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established an ISO 14001:2015 certified Environmental Management System. It identifies the main adverse environmental and social impacts and implements provisions for preventing and/or mitigating them within its boundaries and in the communities where it operates.
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has established ISO 14001 and ISO 45001 certified Management Systems. The social Management System approach considers impacts on employees and the broader community, including procurement transformation, Labour Rights, and Occupational Health and Safety.</p> <p>The Entity's parent company, Hulamín Group, has implemented a Corporate Social Investment (CSI) approach, which is developed from the framework provided by legislation and the CSI Policy.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has outlined its expectations of suppliers in the Code of Conduct for Suppliers and Service Providers, publicly available at: https://www.hulamin.com/about/corporate/corporate-compliance-policies</p> <p>The Entity's sourcing process is documented with regular supplier evaluations. Depending on a supplier risk assessment, suppliers are audited to ensure compliance with international standards and the Entity's expectations.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes.</p> <p>Nonetheless, the Entity's Projects Management Lead oversees the preparation, coordination, and submission of Environmental Impact Assessments, ensuring compliance with regulations and Stakeholder requirements for new and modification projects when required.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes.</p> <p>Nonetheless, the Entity engages with authorised environmental practitioners as required by regulation to assess the social impacts of any project, including applicable Human Rights impacts.</p>
2.7a-f Emergency Response Plan	Conformance	The Entity has established emergency preparation and response procedures including records on emergency drill reports. An Emergency Response Plan is available to Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	The Entity has established several processes to maintain business resilience, including an Enterprise Risk Management process to systematically identify, assess and manage risks that could affect strategic and operational objectives, a taskforce to assess climate-related risks and opportunities, and a comprehensive Emergency Response Plan to manage potential crises, including natural disasters, operational incidents and environmental emergencies.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity's Chief Financial Officer, Compliance Officer, and Treasury are responsible for managing acquisitions and mergers. No mergers or acquisitions have occurred in the last five years. In the event of a merger or acquisition, as a listed company, the Entity would be obliged to make a public announcement concerning any mergers and acquisitions and undertake an Environmental and Social Impact Assessment. It would include assessing environmental aspects (air, waste, water, energy, ecological health), justifiable economic and social obligations, and no-go options.</p> <p>This process consists of public participation from interested and affected parties and is overseen by Stakeholders including the local municipality, provincial authorities, local civic organisations, and Local Communities. The Due Diligence process would also include a thorough review of legal requirements, upon which an environmental and social management plan is based.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity does not aim to suspend or significantly alter its operations and does not currently foresee any factors outside its control as eminent currently, which may constitute an adverse environmental, social, and governance impact issue. However, in the event of a closure, decommissioning, or divestment, a review of closure liabilities would be undertaken through the appointment of a consultant.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity's Material environmental, social and economic impacts are outlined and documented in their Sustainability Report, Integrated Annual Report and/or Impact Assessment Reports, which are available at: https://www.hulamin.com/downloads</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity was issued an administrative fine by the Department of Economic Development, Tourism and Environmental Affairs in February 2024. However, at the time of the Audit, the 2024 financial year was in progress and therefore not yet disclosed. The Entity's disclosure of the related information will be assessed at the next ASI Audit.</p>
3.3a-c Payments to Governments	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 the facilitation of payments. The Entity did not make government payments other than those legally or contractually required. All payments are subject to an annual external financial audit. Audited Financial Reports are disclosed at: https://ir.hulamin.com/financial-reports</p>
3.4a-f 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, available at: https://www.hulamin.com</p> <p>Complaints from the public can be received in person via the corporate affairs office and recorded by the compliance officer. They can also be emailed to hulamin@hulamin.co.za or logged via a third-party managed 'tip-off' line (https://www.tip-offs.com). Employee representatives receive and report complaints and grievances to the</p>

CRITERION	RATING	COMMENT
		Industrial Relations Office. A suggestion box is also in place for employees. https://www.hulamin.com/about/corporate/corporate-compliance-policies
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity's Life Cycle Assessments for customer products follow a 'cradle-to-gate' methodology and analyses environmental impacts across the product's lifespan. The Entity incorporates Scrap Aluminium and Dross recycling into its process. This reduces the amount of pig Aluminium required to produce its products, thereby reducing overall life cycle emissions. The recycling rates for relevant alloys, were used to reduce the indicators from the upstream life cycle stages.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity's LCA was developed following the ASI Performance Standard, ISO 14040—Life Cycle Assessment—Principles and Framework, and ISO 14044—Life Cycle Assessment—Requirements and Guidelines. The LCA considers the life cycle stages of Bauxite Mining and Alumina production, Primary Aluminium Smelting, and Casting and Semi Fabrication, including hardliners.</p> <p>LCA information is provided to customers upon request for the specified products. Customers also receive CBAM (Carbon Border Adjustment Mechanism) information related to carbon emissions associated with goods purchased and imported to the European Union.</p>
4.2 Product Design	Conformance	As a semi-fabricator (midstream segment of the value chain), the Entity adds value by converting raw materials and Scrap into usable products for manufacturers of end-user products. A formal procedure defines the activities related to developing new customer specifications and manufacturing new products which includes sustainability objectives to enhance Circular Economy outcomes.
4.3a-b Aluminium Process Scrap	Conformance	The Entity manages Aluminium Process Scrap within its own operations, and 100% of Scrap is recovered for recycling and/or reuse. The Entity has a process to separate Aluminium alloys and grades for recycling where possible.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity has a strategic intent to increase the sustainable properties of Aluminium for a variety of cans and car applications. To achieve low-carbon Aluminium credentials, there is a strong focus on increasing Scrap metal input, thereby substantially decreasing demand for Primary Aluminium. To promote truly circular Aluminium, they aim to increase recycled content, drive solutions to recycle Aluminium, and increase efficiencies in recycling processes. The Entity has a dedicated executive role that leads the recycling strategy and provides leadership, resources, alignment with corporate goals, and drives implementation and continuous improvement in recycling practices. The Entity has a capital expenditure program in place and Scrap sourcing plans for the next five years.</p> <p>Further information on the recycling strategy is available at: https://www.hulamin.com/about/aluminium-recycling</p>

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity is a founding member of the Metal Packaging Association of South Africa, MetPac-SA, and has been on the Board for five years, and has been a member of the Packaging SA organisation for longer. Packaging SA lobbies the government on Extended Producer Responsibility (EPR) and acts as an umbrella body for all the local Producer Responsibility Organisations (PRO's) (plastics, glass, paper, metals, etc.). MetPac-SA is a PRO for manufacturers, importers, and users of metal packaging that aims to drive recycling rates for metal packaging, supporting manufacturers and users, and collaborates with collectors, recyclers, and municipalities to enhance recovery rates and minimise landfill waste. The Entity also focuses on public awareness programs to inform consumers on the recyclability of metal packaging, and in turn promotes the engagement in recycling initiatives.</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has calculated its Greenhouse Gases (GHG) emissions and disclosed the data for Scopes 1, 2 and 3 GHG Emissions including energy use in its Sustainability Report 2023, pages 47 and 48: https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf</p>
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.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established a GHG Emissions Reduction Plan and GHG Emissions Reduction Pathway, which includes reduction targets for 2030 and based on methodology in line with the GHG Protocol. The Entity's Resources Efficiency Team are responsible for energy-savings opportunities, and the Head of Environmental Sustainability oversees GHG emissions mitigation and energy use. Refer to the Hulamin 2023 Sustainability Report, page 48: https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf</p> <p>Whilst the Audit was undertaken prior to the mandated use of the ASI methodology, the Entity used the ASI GHG Calculation Tool to determine its Pathway using the ASI method, which demonstrated that the Entity's Scope 1 and 2 (process) slope and Scope 3 (procurement) slope are aligned with the 1.5°C warming scenario.</p> <p>However, the Entity's 2030 target is not within the required five years from the baseline year set, and the GHG Emissions Reduction Pathway (based on either the original GHG Protocol methodology or the subsequent ASI method) has not been disclosed.</p>

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Conformance	The Entity has defined a GHG Management System, including the person(s) responsible. The Entity has implemented management processes to manage GHG Emissions including metering, review of invoices, and consumption data as a basis for GHG calculations. The Entity's GHG management process is documented in a procedure and includes data collection, internal verification, inventory development, external verification, reporting, and reduction planning.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has reported its Emissions to Air and undertakes monitoring to comply with applicable legislation and license requirements, and to minimise the environmental impact at the Pietermaritzburg and Richards Bay sites. The air emissions information and management plans are disclosed in the Sustainability Report 2023, page 50: https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf
6.2a-g Discharges to Waters	Conformance	The Entity has made water-related related disclosures, including withdrawals, discharges and effluents in the Sustainability Report, page 50: https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf Additional water disclosures are available at: https://www.cdp.net/en/responses/8641
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted assessments on Spills and Leakages management, and waste is managed and well controlled. Waste manifests are collected and maintained in conformance with ISO 14001:2015 standards. The Entity's management plan is disclosed in the Sustainability Report, pages 45, 48 and 51: https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Where Spills have occurred, they are reported to the authorities. Spills have only occurred within the boundary of the Entity and therefore no affected parties have been informed. However, in the event where a Spill may affect external parties, the incident is published in the local newspaper.
6.5a-c Waste Management and Reporting	Conformance	Whilst a formal Waste management strategy has not been established, the Entity has implemented a procedure which outlines Waste mitigation practices. Waste volumes are disclosed in the 2023 Sustainability Report, page 50: https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf
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.

CRITERION	RATING	COMMENT
6.8a-d Dross	Conformance	The Entity has implemented Dross recovery and Dross recycling processes. The calculated Scope 3 emissions from purchased metal include Primary Aluminium, alloying metals (hardeners), use of Scrap metal, and metal recovered from Aluminium Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The water for both the Entity's facilities is drawn from local municipality lines and continuously measured using a flowmeter. Third party assurance and assessment by local authorities is undertaken. The Hulamín Group has published water reduction targets.</p> <p>The WRI Aqueduct is used to identify withdrawals from areas with water stress. Water stress is profiled as 'medium-high' for both sites. These systems are highly vulnerable to prolonged periods of below-average rainfall and irresponsible water use, which place significant demand on water resources. The Entity's water withdrawals are disclosed in the Sustainability Report 2023, page 49: https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf</p>
7.2a-e Water Management	Conformance	<p>The Entity operates within the requirements of its water license. In 2023, there was an increase in water withdrawal intensity (kL/tonne product) due to a decrease in production volumes and a plant shutdown at the Pietermaritzburg site.</p> <p>The Entity is aware 'water shedding' will become a threat soon and are therefore improving wastewater quality, reusing wastewater, and reducing effluent generation. The water strategy and management plan addresses installing rainwater harvest and wastewater treatment facilities and reducing freshwater water requirements by half by 2030. The water strategy and management plan are disclosed in the Sustainability Report 2023, page 49: https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity conducted a Biodiversity assessment in 2021-22, utilising various international and South African biodiversity assessment tools. Both Facilities were found to be 100% transformed and lack ecological significance with no Biodiversity value.</p> <p>Nonetheless, a Biodiversity management plan is in place, addressing issues beyond the Facilities' boundaries. Air emissions from the Entity contribute to regional air pollution, and reducing these emissions may lower municipal and neighbourhood risks. The Entity actively participates in local Air Quality Assessment Management processes as an interested Stakeholder.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity has conducted Biodiversity assessments across its Facilities and the surrounding areas, which determined an approach to achieve a 'Net Positive' gain in Biodiversity by supporting outcomes that will not only minimise negative impacts, but actively contribute to positive results. Whilst the assessment determined there is no

CRITERION	RATING	COMMENT
		significant impact on Ecosystem Services, the Entity is committed to extending their commitment beyond minimising direct impact, and engage in initiatives to address the biodiversity challenges associated with suppliers, particularly in the eradication of invasive plant species, supporting nature-based projects, and supporting water resource management.
8.2a-g Biodiversity Management	Conformance	<p>The Entity has established an action plan that addresses the findings from the Biodiversity assessment, including measures such as soil testing, rock and debris removal, topsoil management, erosion control, visual inspection, and maintenance. Although Biodiversity is not a Material aspect in terms of the Entity's Materiality assessment, it has made commitments and implemented programs to mitigate degradation and fund projects to eradicate invasive species and undertake weed control, for conservation efforts such as sedimentation control, soil contamination rehabilitation, and river pollution reduction.</p> <p>Internal resources are formally trained to identify and eradicate invasive species and undertake inspections and maintenance of services. In coming years, there is an opportunity to support community tree planting and revegetation projects.</p> <p>The Entity's Biodiversity and land management plan is disclosed Sustainability Report 2023, page 50: https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as there are no Priority Ecosystem Services identified.
8.4 Alien Species	Conformance	The Entity has proactively implemented systems to prevent accidental or deliberate introduction of Alien Species that could have Material adverse impacts on Biodiversity and Ecosystem Services. The removal of the naturalised weed <i>Conyza bonariensis</i> is planned. Due to its invasive nature, it suppresses the growth of indigenous vegetation in the open habitats it favours. No residual or cumulative impacts are expected provided that the recommendations are implemented.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has no plans to explore or develop New Projects. Records reflect that the existing sites were not established on any heritage sites and will comply with all relevant biodiversity regulations and environmental plans for each district Municipality. The Entity adheres to the regulations governing new and formally designated Protected Areas established by legislation regarding World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity has engaged a third-party specialist to assess Biodiversity. There are no Protected Areas within their Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

9. HUMAN RIGHTS

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Conformance	<p>South Africa has a robust legal framework in place to ensure that Human Rights and Labour violations do not occur. The Entity has been audited by the Government to ensure labour and community rights are in place. There are Collective Bargaining Agreements with the relevant Unions/organised labour teams and the Entity has implemented a Stakeholder Engagement Policy process and a Human Rights Policy, which is publicly available at: https://www.hulamin.com/sites/default/files/downloads/HULAMIN%20HUMAN%20RIGHTS%20POLICY.pdf</p> <p>No negative Human Rights impacts or grievances have been reported.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has an Employment Equity Policy that prioritizes the advancement of all employees, particularly those from designated groups, with the objective of offering equitable opportunity to historically disadvantaged South Africans. There is a formal Employment Equity Plan, setting specific targets for black and female representation, which an employment equity Committee oversees. Other programs include skills development and talent management, as well as investing in training programs to improve the competencies of personnel.</p> <p>Data on female and African representation are available at various levels across the Hulamin Group (Senior Management, Middle Management and Junior Management) and employment equity data are supplied to the Department of Labour.</p> <p>The effectiveness of the measures taken to promote gender equity is disclosed in the 2023 Sustainability Report, pages 27-29: https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence.
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 are no Indigenous Peoples in the Entity's Area of Influence.
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 are no New Projects or major changes to existing projects that may have material impacts on the Indigenous Peoples associated culturally and living on the relevant lands within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural and heritage sites identified or applicable to Entity as confirmed by the Entity's Legal department.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as the Facilities are not located in an area where Indigenous Peoples or their lands, territories and resources are impacted.

CRITERION	RATING	COMMENT
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes to existing sites that may have material impacts that require resettlement.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity monitors any significant impacts, including community health and safety, social and cultural rights and environmental impacts resulting from their activities.</p> <p>The Entity has defined the communities as one of its Stakeholder groups. Stakeholders include shareholders, institutional investors, creditors, lenders, suppliers, customers, regulators, employees, unions, the media, analysts, consumers, society in general, communities, auditors and potential investors. No community grievances have been received regarding displacements, dependency, cultural and Human Rights.</p> <p>The Entity's parent company, Hulamín Group, has implemented a Corporate Social Investment (CSI) approach, which is developed from the framework provided by legislation and the company CSI Policy. Under the CSI commitment, Hulamín invests time and financial support in key focus areas, such as youth development, education (in infrastructure, STEM tutoring and a bursary programme), health and welfare, environmental protection, crime prevention, and the employee volunteerism programme. Hulamín spends at least 1% of its annual revenue on these initiatives. Hulamín has also a partnership arrangement to create opportunity to support local businesses, especially small, black-owned, and black women-owned businesses, in its procurement transformation programme.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Minor Non-Conformance	<p>The Entity is not located in a Conflict-Affected and High-Risk Area (CAHRAs) and the Entity's legal team confirm that the Entity's supply chain is not affected by any conflict nor situated in a CAHRA.</p> <p>However, the Entity has not fully established and implemented a system that allows the for the identification and assessment of risks in the supply chain in accordance with the OECD Due Diligence Guidance.</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Not Applicable	This Criterion is currently not applicable to the Entity, as it has not established a system that could appropriately address the requirements of this Criterion.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Not Applicable	This Criterion is currently not applicable to the Entity, as it has not established a system that could appropriately address the requirements of this Criterion.
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 Audit, which meets the requirement of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Minor Non-Conformance	The Entity's annual reporting does not include information on its supply chain Due Diligence in accordance with the OECD Due Diligence Guidance.
9.9 Security practice	Conformance	The Entity subscribes to the Voluntary Principles on Security and Human Rights (https://www.voluntaryprinciples.org). Security services are outsourced, and the Entity does not employ armed security forces. The security partner has their own Human Rights Policy and confirmed

CRITERION	RATING	COMMENT
		security personal training. Interviews with Workers confirmed that security staff treat Workers respectfully. A dedicated on-site manager ensures that employees and any community members entering the site are treated humanely.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	As confirmed by interviews with the Union leader, Workers and management, and by document review, the Entity respects the rights of Workers to unite freely in the Unions and seek representation without interference. Freely elected Worker representation is in place with the presence of two Trade Unions and Collective Bargaining agreements.
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 right to Freedom of Association and Collective Bargaining is not restricted in the country (South Africa) where the Entity operates.
10.2a Child Labour	Conformance	Child Labour is prohibited by the Entity, and this is specified in the Entity's Recruitment and Selection Policy. The document details the approach to internal and external recruitment and covers all resourcing/recruitment activities at the Entity. The minimum age for employment was confirmed as 18 years. Interviews with employees, a review of documents and site visits confirmed that only adults are employed.
10.3a-c Forced Labour	Conformance	<p>The Entity does neither engage in nor support the use of Forced Labour and 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>The Entity's Modern Slavery Statement is available at: https://www.hulamin.com/about/sustainability</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity's Employment Equity Policy addresses the requirements of the ILO C111 on Discrimination and C100 on equal remuneration requirements. The objective of the Employment Equity Policy is to achieve equity in the workplace through the elimination of unfair discrimination and the promotion of equitable work practices, as well as to offer equal employment opportunities and development to all persons regardless of race, colour, religion, disability or gender. In pursuit of this Policy, focused attention is paid to areas where under-representation in relation to relevant demographics exist.</p> <p>Employees were randomly selected and at various workstations to verify the extent which the Policies and procedures have been implemented. Generally, the Workers demonstrated understanding of Entity's various Policies and procedures.</p>
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity ensures open communication and direct engagement with Workers and their representatives, for example, via meetings with internal Trade Union representations regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment.

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	<p>As confirmed through 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. A formal procedure to manage grievances is in place. The Human Rights Policy addresses aspects of the prohibition of Harassment and Violence, which is available at:</p> <p>https://www.hulamin.com/sites/default/files/downloads/HULAMIN%20HUMAN%20RIGHTS%20POLICY.pdf</p> <p>The Entity also has developed a detailed harassment guideline governing internal requirements.</p>
10.7a-c Remuneration	Conformance	<p>The Entity respects 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>
10.8a-c Working Time	Conformance	<p>As confirmed by interviews with Workers, Workers' representatives and management, the Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave.</p> <p>Employee working hours are governed under the <i>Basic Conditions of Employment Act</i>. Should employees work Overtime and on public holidays, remuneration is in line with the Act.</p> <p>There is access control and time, and attendance is recorded using biometry, including for Overtime.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>All the Entity's Policies (Employment Equity Policy, Human Rights Policy, and Harassment Policy) and procedures are communicated through induction and awareness training sessions.</p> <p>Employees were randomly selected and interviewed at various workstations to verify the extent to which the Policies and procedures had been implemented. Generally, they demonstrated an understanding of the Entity's Policies and procedures.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Major Non-Conformance	<p>The Entity has an ISO 45001:2018 certified Occupational Health and Safety (OH&S) Management System and has adopted, implemented and communicated Health and Safety Policies that address OH&S. These Policy statements are supported by the Group's Health and Safety standards. The Entity has demonstrated that the Group supports their implementation by providing personnel and financial resources.</p> <p>However, it was identified at the Audit, that contractor personnel at the Richards Bay site did not have the appropriate lockout permit when performing maintenance work on equipment. In addition, there is no evidence of an electrical certificate of compliance for the operational areas.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's OH&S Management System is reviewed on a regular basis. The effectiveness of the OH&S Management System using indicators such as Lost Time Injury Frequency Rate (LTIFR) and the comparative analyses with peer businesses and leading practice is disclosed in the 2023 Sustainability Report, pages 21-22:</p>

CRITERION	RATING	COMMENT
		https://www.hulamin.com/sites/default/files/downloads/Hulamin%20Sustainability%20Report%20for%20the%20year%20ended%2031%20December%202023.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented and is operating a documented OH&S Management System. Appropriate Health and Safety Committee meetings are conducted, and member contributions are actioned accordingly.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	10 April 2025	Initial Certification Audit – Provisional Certification