

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Midal Cables Saudi

CERTIFICATE NUMBER
495

ASI STANDARD
**PERFORMANCE
STANDARD
(V3.1 2023)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
CETIZION VERIFICA

DATE OF ISSUE
25 AUGUST 2025

DATE OF EXPIRY
24 AUGUST 2028

CERTIFIED SINCE
25 AUGUST 2025

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Al...', 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

Production of Aluminium Rod Coils
and Bare Aluminium Conductors
(OHL) at Midal Cables Saudi,
located in Dammam, Saudi Arabia.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Midal Cables
ENTITY NAME	Midal Cables Saudi LLC
CERTIFICATION SCOPE	Production of Aluminium Rod Coils and Bare Aluminium Conductors (OHL) at Midal Cables Saudi, located in Dammam, Saudi Arabia.
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 V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none">13 – 16 July 2025
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 August 2025
AUDIT SCOPE	<p>The Audit Scope includes the production of Aluminium Rod Coils and Bare Aluminium Conductors (OHL) at Midal Cables Saudi, located at Dammam, Saudi Arabia.</p> <p>The 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.

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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	25 August 2025 – 24 August 2028
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	24 February 2027
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CERTIFICATE NUMBER	495
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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

Midal Cables Saudi ('the Entity'), Midal Cables Saudi ('the Entity'), which commenced operations in 2014, is a manufacturer and exporter of Aluminium wires, rods and conductors for varied industrial applications. The Entity has casting line with wire rod capacity of 60,000 tonnes per annum and conductor and alloy conductor capacity of 45,000 tonnes per annum

The Entity is located within the MODON-2 Industrial Area, in the city of Dammam, Saudi Arabia and utilises primary Aluminium sourced from the Ma'aden smelter. The Entity has wire drawing machines (single spoiler and double spoiler), heat treatment ovens and stranders (both for 12 wire and 61 wire capacity). Hot dross initial processing is undertaken internally using a mechanical press and further sent to authorised external agency for additional Aluminium recovery.

The Entity is currently installing roof top solar photovoltaics for the use of renewable energy. The nearest airport to the Entity is the Dammam Airport, situated approximately fifty kilometres away, and the Entity is well connected by road and to the nearest seaport. Given its location in an Industrial Area, there are no nearby sensitive receptors such as residences, school or recreational areas. 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 as defined in procedure such as Industrial Facility License issued by Ministry of Industry and Mineral Resources and the Industrial Area Authority (MODON).</p> <p>The Entity also maintains a documented Compliance checklist, addressing the terms and conditions of legal permits. The Entity's respective Department Manager are responsible for implementation. The Entity conducts an annual corporate governance audit against Compliance with their Corporate Governance Code.</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. The internal controls are defined within the Policy. Training for management and other relevant employees is conducted and training attendance records are maintained.</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 the induction process, and adherence to the Code is a condition of all employment contracts.</p> <p>The Code of Business Ethics is available at: https://drive.google.com/file/d/15DrJELE0Gq6MYRIT6TUX8rMwYn2FDksj/view</p> <p>Training for management and employees is conducted and training attendance records are maintained.</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 management practices have been disclosed in the Entity's Sustainability Report (pages 4-5) at: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf and https://www.midalcable.com/qshe-sustainability-policies</p>
2.2a-c Leadership	Conformance	<p>The Entity has designated the General 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 which includes Policies, procedures, internal monitoring and other relevant practices. The Entity's Management System is certified against the ISO 14001:2015 Standard.</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has developed a Social Management System that includes Policies, procedures, internal monitoring and other relevant practices. The Social Management System is in conformance with all Applicable Laws including the Labour Law.</p>

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Minor Non-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 available at: https://drive.google.com/file/d/18u24BtKAqJ6SWwzDaEprMHZ0PLUxdjd-/view</p> <p>The Entity has engaged its supplier of Aluminium Ingots regarding its supply chain Due Diligence process. The Aluminium Ingot supplier is ASI Performance Standard Certified. Further information on the Entity's responsible sourcing practices is available in the Entity's Sustainability Report on page 55: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p> <p>The Entity however has not implemented measures such as supply chain audits to assess conformance with, and effectiveness of its responsible sourcing framework.</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 including molten metal spills, gas leaks and fire. The Entity has conducted periodic emergency drills and the EPRP is audited periodically as part of its ISO 45001 certification. The Entity's EPRP is available via Stakeholder request.</p> <p>Further information on the Entity's EPRP is available in the Sustainability Report, page 88: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
2.8a-d Suspended Operations	Conformance	The Entity has developed a Policy on suspended operations which considers Material adverse environmental, social and governance impacts. The Entity conducts periodic reviews of their Disaster Management Plan. The Entity is member of the Gulf Aluminium Council (GAC) which comprises of upstream and downstream companies that have access to, and share information relating to the Aluminium sector in the Gulf Region.
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 closure, decommissioning or divestment since the Entity became an ASI Member, and none are currently planned.

CRITERION	RATING	COMMENT
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 2024 Sustainability Report, which includes the Entity. The Sustainability Report is prepared in accordance with the Global Reporting Initiative (GRI) Guidelines and addresses the disclosure requirements associated with the ASI Performance Standard. The Sustainability Report 2024 is available at:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</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. Governance-related disclosures are included in the Sustainability Report on page 97:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity makes payments to governments for legitimate purposes only in local currency (Saudi Riyal), for value added tax and corporate tax, in accordance with the Kingdom of Saudi Arabia tax regime. Related disclosures are made in the Entity's 2024 Sustainability Report, on page 98:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	<p>The Entity has implemented grievance handling Policies. Ensuring 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 previous year. Grievance disclosures are disclosed in the Entity's Sustainability Report on page 86:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p> <p>During the Audit however, it was noted during interviews with randomly selected Workers and contractors that awareness of the Entity's Grievance Mechanism were not at a satisfactory level.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has conducted Life Cycle Assessments (LCAs) of its major three (3) Products - EC Rod, EC Conductor and Alloy Conductor. The LCA evaluates the environmental impacts of one tonne of Product from 'cradle-to-gate' and considers the principles as prescribed in the ISO 14040:2006 and ISO 14044:2006 Standards. Refer to:</p> <p>https://www.environdec.com/library/epd2308 and https://api.environdec.com/api/v1/EPDLibrary/Files/6d3d8a74-4697-4242-899e-57fbc0c8a356/Data</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The LCAs of Products produced (EC Rod, EC Conductor and Alloy Conductor) are available to customers on request. The Entity has provided LCA-related disclosures in its Sustainability Report on page</p>

CRITERION	RATING	COMMENT
		57: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf
4.2 Product Design	Conformance	<p>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 general product specifications are mentioned in the Entity's Sustainability Report, on pages 22-23:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p> <p>and at: https://www.midalcable.com/aaac-all-aluminium-alloy-conductors</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity collects Aluminium Process Scrap according to material grade. There is one bailing press on site and bundles (cubes) are labelled. The Entity maintains a monthly inventory record of process Scrap generated and Scrap re-melted.</p> <p>The Entity has established a target to remelt and reuse 100% of its Process Scrap.</p>
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Conformance	<p>The Entity makes efforts to identify and purchase Post-Consumer Scrap from Gulf Cooperation Council (GCC) Members, through 'buy-back' arrangements with customers and other means.</p> <p>The Entity has developed a recycling strategy, which is disclosed in the Sustainability Report on page 47:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity works within regional forums to promote the collection and recycling of products at 'End of Life', to promote the Circular Economy, and energy transition and de-carbonisation strategies The Entity 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:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has calculated its Material Greenhouse Gas (GHG) Emissions, including Scopes 1 and 2 emissions, and Scope 3 (Category 1) emissions for the purchase of Liquid Aluminium and Primary Aluminium at the corporate and Entity level. The energy data and GHG Emissions data are externally verified and disclosed in the Sustainability Report 2024, pages 36-39:</p> <p>https://drive.google.com/file/d/1dPOqvs-ezZCUKpnmqmZptGwB8Lu4ehaE/view</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.

CRITERION	RATING	COMMENT
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 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 Pathways Calculation Tool. The Entity's Pathway is based on a 2023 baseline and includes Intermediate Targets for 2028 and 2030 for Scopes 1 and 2 emissions, and separate targets for Scope 3 (Category 1) emissions. The related disclosures are included in the 2024 Sustainability Report, on pages 38–39:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
5.3b–e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan and a GHG Emissions Reduction Pathway in accordance with the ASI Pathways Calculation Tool with Intermediate Targets, which are periodically reviewed, e.g. Scopes 1 and 2, actual GHG intensity during the year 2024 was 0.223 tCO₂/tAl with Intermediate Targets of 0.18 tCO₂/tAl by year 2028. The overall GHG emissions intensity is below the sectoral GHG intensities. The related disclosures are included in the 2024 Sustainability Report, pages 38–39:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has developed and maintained GHG emissions reduction-related Policies, targets, and implementation guidelines at both the Group and Entity levels. The Entity is implementing its GHG Emissions Reduction Plan and is primarily focusing on working with the adjacent smelter to receive low-carbon Liquid Aluminium, increasing the use of renewable energy, (primarily from its rooftop 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	Minor Non-Conformance	<p>The Entity conducts periodic stack emissions monitoring for air pollutants including Particulate Matter (PM_{2.5} and PM₁₀) using an external agency. Monitoring results are found within permissible limits.</p> <p>During the Audit, it was noted that localised air emissions near tilting furnaces at the Wire Rod area are not routed (extracted) effectively to the attached stack.</p> <p>Air emissions related disclosures are provided in the Entity's Sustainability Report on pages 37–39:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
6.2a–g Discharges to Waters	Conformance	<p>The Entity collects and discharges wastewater from both sewage and industrial use to an authorised and approved contracting agency. The Entity has developed and implemented a waste management plan, which includes Waste manifest data and records. Related disclosures are provided in the Sustainability Report on page 45:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>

CRITERION	RATING	COMMENT
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 via the Entity's intranet. The spills risk rating has been assessed as high. Identified control measures including secondary containment and the provision of spill kits were found implemented as confirmed during the Audit.</p> <p>The Entity has developed emergency response actions and 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 made by the Safety Officer.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity publishes the status of Spills and Leakages when they occur. There were no Spills or Leakages during the reporting period and ASI membership. The related disclosures are included in the Sustainability Report 2024, page 51: https://drive.google.com/file/d/1dPOqvs-ezZCUKphmqmZptGwB8Lu4ehaE/view</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity collects and disposes of different types of Waste to an authorised agency. The Entity maintains Waste manifest documents for the disposal and treatment of Hazardous and Non-Hazardous Wastes. During the Audit however, it was noted that one certificate of disposal had not been collected from waste service provider as required by the Entity's waste management plan.</p> <p>The related disclosures are provided in the Entity's Sustainability Report on pages 47-49: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
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	<p>The Entity undertakes hot Dross processing within the premises using a mechanical Dross press. The skimmed Dross from melting furnaces and tilting furnaces is processed through a mechanical press to recover trapped molten Aluminium and pressed Dross (residue) is stored to cool down inside and further disposed to an authorised agency.</p> <p>Quantities of Dross generated and disposed are recorded. Related disclosures are provided on page 50 in the Sustainability Report: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity only sources water from the industrial area authority, which invoices monthly based on actual consumption. Water is sourced from desalinated water from the nearby sea. The Entity has developed a site-specific Water Assessment Procedure.</p>

CRITERION	RATING	COMMENT
		Total water consumption is recorded on a monthly basis and related disclosures are provided in Sustainability Report on pages 45-46: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf
7.2a-e Water Management	Conformance	<p>The Entity has developed a water management plan to improve their water footprint in response to the water-related risks identified.</p> <p>The Entity records water consumption per tonne of production. Water reduction targets have been established for short, medium and long terms as per the Group's ESG strategy. Related disclosures are provided in the Sustainability Report on pages 45-46: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has conducted a Biodiversity risk and impact assessment in accordance with International Finance Corporation (IFC) and ISO methodology to assess potential impacts within the Entity's Area of Influence as well as in 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 proximity to the Entity. The assessment concluded that the Entity has an overall low impact. Further information is provided in the Entity's Sustainability Report on page 47: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the current Biodiversity risk assessment determined that there are no risks to Biodiversity or Priority Ecosystem Services.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the current Biodiversity risk assessment determined that 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 current Biodiversity risk assessment determined that 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. Wooden pallets are fumigated in accordance with the International Standards for Phytosanitary Measures (ISPM) Standard.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has expressed a commitment to 'No Go' in World Heritage Properties and developed relevant Policies and disclosures. There are no future expansion plans which could negatively affect World Heritage Properties.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as the current Biodiversity assessment determined that there are no Protected Areas nearby or within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
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		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has completed a Human Rights Due Diligence process addressing the entire supply chain, including Workers, contractors and communities. The Entity has implemented gender-responsive Policies in response to the Due Diligence outcomes as well as addressing Human Rights aspects in its Code of Business Ethics. Refer to: https://drive.google.com/file/d/1PuGKnrgCligilNI2nWoiAJEgqydganU/view</p> <p>The Entity has implemented a supplier onboarding process to address Human Rights conditions and other issues including quality, environment and safety. Related disclosures are provided in the Entity's Sustainability Report on page 85–86: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity promotes women's employment and gender equity. Currently six percent of the Entity's workforce are women of Saudi nationality. The Entity has implemented a plan to increase women's employment. Gender diversity disclosures are provided in the Sustainability Report on page 78–79: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p> <p>The Entity however 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	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in the Entity's Area of Influence as confirmed via secondary research.
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. There are no Indigenous Peoples in the Entity's Area of Influence as confirmed via secondary research.
9.4b Free, Prior, and Informed Consent (FPIC) – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in its Area of Influence.
9.4c Free, Prior, and Informed Consent (FPIC) – Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in its Area of Influence.
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 its Area of Influence that could be negatively affected by the Entity's activities.

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as its 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 sites.
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	<p>The Entity is located within the MODON Industrial area and there are no nearby communities. The Entity is registered with the 'Zakat, Tax and Custom Authority' for community-related charity work.</p> <p>The Entity contributes towards the MODON Afforestation program through financial support.</p>
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 a specific assessment of its Aluminium supply chain. The Entity has consulted with its sole Primary Aluminium (Liquid Aluminium) supplier, which is an ASI Certified Entity against the ASI Performance Standard. 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 the ASI Performance Standard Audit and satisfy the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity has assessed their supply chain risk and determined that there are no current risks related to CAHRAs. The Entity has disclosed information on its supply chain Due Diligence in the 2024 Sustainability Report on page 55:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
9.9 Security practice	Conformance	<p>The Entity has an agreement with an external security provider and hires security guards from an external agency. The contract covers applicable conditions, including a clause on liability coverage and workmen's compensation insurance for deployed employees.</p> <p>Interviews with security personnel during the Audit confirmed that necessary training on their role, Health and Safety regulations, visitor management, and emergency response has been provided.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	The Criterion is not applicable to the Entity as it adheres to Saudi Labour Laws with respect to Freedom of Association and rights to Collective Bargaining where it is prohibited to form an organised Trade Union. The Kingdom of Saudi Arabia has not ratified ILO

CRITERION	RATING	COMMENT
		Conventions on the Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87) (C.87) nor the Right to Organise and Collective Bargaining Convention, 1949 (No. 98) (C.98).
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity provides various alternate mechanisms for the Workers to associate themselves, and to raise their concerns to management via 'Town Hall' meetings and Safety Committees.
10.2a 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. The Entity does not employ any child or juvenile Workers as confirmed via a review of employment records (proof of age) and plant visit observations.
10.3a–c Forced Labour	Conformance	<p>The Entity has implemented its Human Resources Policy and does not use Forced Labour, nor undertake 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.</p> <p>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 Modern Slavery Statement is available at: 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. The Entity took disciplinary measures without any discrimination as per the applicable rules by Ministry of Labour.</p> <p>The Entity has received 'Platinum' level under the Government's "Saudization" program. Currently 37 percent of Workers are of Saudi nationality and the remaining employees are from nine nationalities including Bahrain, India, Bangladesh, Sri-Lanka, Yemen, Pakistan, Sudan, Syria and Nepal.</p> <p>Related disclosures are provided in the Sustainability Report on page 85: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
10.5 Communication and engagement	Conformance	<p>The Entity engages employees on workplace matters and employees are comfortable to raise concerns. Some of the engagement activities the Entity participates in includes Foundation Day and National Day celebrations, breast cancer awareness, New Year celebrations and other social engagements. Further information is provided on page 82 of Sustainability Report:</p> <p>https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</p>
10.6a–g Violence and Harassment	Conformance	The Entity has established a Policy to prevent Violence and Harassment as part of their Code of Business Ethics, which is available

CRITERION	RATING	COMMENT
		<p>at: https://drive.google.com/file/d/1PuGKnrgCligiINi2nWoiAJEgqydganU/view</p> <p>Related training is provided during Worker inductions and as a refresher course. There were no cases of Violence or Harassment identified. Any reported case will be managed in accordance with the Entity's grievance management procedures.</p>
10.7a-c Remuneration	Minor Non-Conformance	<p>The Entity has defined a Remuneration Policy as part of their Human Resources Policy and Code of Business Ethics, in conformance with Kingdom of Saudi Arabia Labour Law. Overtime is paid at a premium rate and is in accordance with the Applicable Saudi Law. Workers' salaries are paid on monthly basis and in full via bank transfer. A wage slip is sent to the employee's email address.</p> <p>Social security norms called GOSI are followed for both Saudi and Non-Saudi Workers and all employees are covered under Corporate Care Health Insurance (CCHI) as part of their Remuneration and benefits. Additional allowances including food, accommodation and casting, which are calculated on number of days worked and paid along with monthly salary.</p> <p>The Entity however has not calculated a living wage to ensure Workers receive a wage for a normal working week or month that is sufficient to meet the basic needs of Workers and to provide some discretionary income.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>The Entity has defined a working hours policy as part of its Human Resources Policy and Code of Business Ethics, which are in conformance with Kingdom of Saudi Arabia Labour Laws.</p> <p>The Entity employs a biometric recognition system for recording working hours. During the Audit, working hours were reviewed for randomly selected employees both male and female, permanent and contractor across various functions for three months. It was identified during the Audit that some Workers had worked hours more than that prescribed in the Entity's working hours Policy and related Applicable Law. Additionally, no systematic root cause was identified for this 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 activities. This was confirmed during the documentation review and Worker interviews. 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 with nil open non-conformities. The Entity has developed Standard Operating Procedures (SOPs) and Work Instructions, both of which are documented and made available at the place of use. The Entity has conducted a hazard identification and risk assessment across departments and activities, for activities including forklift operations, operating Scrap machine (bailing), machines, and wire drawing and stranding.</p>

CRITERION	RATING	COMMENT
		<p>The Entity has formed a Safety Committee with members from management and Workers that meets every week chaired by the General Manager. Personal Protective Equipment (PPE) is provided in accordance with identified Health and Safety risks and is provided free of cost and periodically replaced. Safety signage is displayed in three languages (Hindi, English and Arabic) with infographics for ease of understanding among employees and visitors.</p> <p>It was identified however that the Entity does not have enough persons trained as First Aid Officers.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity conducts annual management review of OH&S performance, chaired by the General Manager, last conducted in January 2025. This review considers Health and Safety performance in terms of lagging and leading indicators including Lost Time Injury Frequency Rate (LTIFR), first aid cases, fire notifications, number of permits to work issued and safety training hours.</p> <p>The Entity has an OH&S Key Performance Indicators (KPIs) tracking system, which is updated monthly. Benchmarking against peers has been completed internally using global data following the OH&S assessments. Related disclosures are provided in the Sustainability Report on pages 87-89: https://www.midalcable.com/storage/homepage/pdf/midal-cable-sustainability-report-2024-final-june26th.pdf</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. A safety toolbox talk is held every day at the start of working shifts.</p> <p>A training plan is developed for each month and training records are maintained and verified.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	25 August 2025	Initial Certification Audit – Full Certification