

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Maaden Aluminium

CERTIFICATE NUMBER
139

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE
16 JULY 2024

DATE OF EXPIRY
15 JULY 2027

CERTIFIED SINCE
16 JULY 2021

AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a large, flowing 'A' followed by a horizontal line.

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

Maaden Aluminium includes
Bauxite mining at the Al Ba'itha
Mine (Al-Qassim City, Saudi Arabia)
and the operations at the Ras al-
Khair plant (Ras Al-Khair Industrial
City, Saudi Arabia) for Alumina
Refining/smeltering, Aluminium Re-
melting, Casthouses producing
ingots, billets and slabs and
manufacturing of flat rolled
products.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Maaden Aluminium
ENTITY NAME	Maaden Aluminium
CERTIFICATION SCOPE	Maaden Aluminium includes Bauxite mining at the Al Ba'itha Mine (Al-Qassim City, Saudi Arabia) and the operations at the Ras Al-Khair plant (Ras Al-Khair Industrial City, Saudi Arabia) for Alumina Refining/smelting, Aluminium Re-melting, Casthouses producing ingots, billets and slabs and manufacturing of flat rolled products.
SUPPLY CHAIN ACTIVITIES	• Bauxite Mining • Alumina Refining • Aluminium Smelting • Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (11 – 29 April 2021) • Re-Certification Audit and Scope Change (7 August 2023 – 8 September 2023) • Surveillance Audit (21 – 25 June 2026)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	• 11 – 29 April 2021 (Initial Certification Audit) • 7 August 2023 – 8 September 2023 (Re-Certification Audit and Scope Change) • 21 – 25 June 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 4 June 2021 (Initial Certification Audit) • 28 March 2024 (Re-Certification Audit and Scope Change) • 8 July 2026 (Surveillance Audit)
AUDIT SCOPE	<u>Initial Certification Audit (11 – 29 April 2021)</u> The Audit Scope includes all activities at the Al Ba'itha Mine and operations at Ras Al-Khair industrial city, Saudi Arabia. The Audit also included processes performed from Head Office such as Sustainability Reporting, human capital, governance and compliance, employee accommodation in Ras Al-Khair and Al Ba'itha mine site. Supply chain activities included in the Audit Scope: • Bauxite Mining • Alumina Refining • Aluminium Smelting • Aluminium Re-melting/Refining • Casthouses

- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (April 2021), access to the site at Al Ba'itha mine was limited, due to COVID-19 related travel restrictions, however all Facilities at the Ras Al-Khair industrial city were audited on-site. Therefore, the Audit can be considered as a combined desktop and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4).

Re-Certification Audit and Scope Change (7 August 2023 – 8 September 2023)

The Audit Scope included all activities and facilities within Maaden Aluminium, Al Ba'itha and Ras Al-Khair Bauxite mines, Alumina Refinery, Aluminium Smelting, Aluminium re-melting/refining, Casthouse producing ingots, billets, and slab, and semi-fabrication of flat rolled products.

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (21 – 25 June 2025)

The Audit Scope included all activities and facilities within Maaden Aluminium, Al Ba'itha and Ras Al-Khair Bauxite mines, Alumina Refinery, Aluminium Smelting, Aluminium re-melting/refining, Casthouse producing ingots, billets, and slab, and semi-fabrication of flat rolled products.

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME	Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that: ☒ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. ☒ 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	16 July 2024 – 15 July 2027
NEXT AUDIT TYPE	Re-Certification Audit

NEXT AUDIT DATE	15 July 2027
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CERTIFICATE NUMBER	139
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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

Maaden Aluminium Company (MAC) has developed one of the largest integrated Mining and Aluminium processing complexes in the world. The Mine is located at Al Ba'itha in the Northeast of Saudi Arabia and the Aluminium processing Facility is located at Ras Al-Khair, North of Jubail. The integrated complex at Ras Al-Khair consists of Aluminium Refining, smelter and rolling mills. The Bauxite comes from the Al Ba'itha mine, which includes ore-crushing and handling Facilities. The mine's estimated production is four million tonnes of Bauxite annually which is transported via the new North-South railway line to Ras Al-Khair.

Maaden Aluminium Alumina Refinery processes Bauxite from the Al Ba'itha Mine site continuously and produces Smelter-Grade Alumina (SGA) at an average base case rate of 1.8 – 2.0 million tonnes per annum (Mtpa). The Alumina refinery utilises the well-established Bayer process. This process purifies the hydrated Alumina minerals within the bauxite. It converts them from a monohydrate to a trihydrate form which is then calcined to remove the chemically bound moisture to produce the final product of Smelter-Grade Alumina (Al_2O_3).

The MAC Smelter Aluminium manufacturing Facility includes a reduction (Electrolysis) process and a carbon plant. The main purpose of the Carbon Plant is to manufacture pre-baked anodes. Carbon anodes are manufactured from petroleum coke, recycled spent anodes and liquid coal tar pitch. Maaden Aluminium Smelter is an AP37 electrolysis process utilising Aluminum Pechiney (AP 3X) technology and designed to run up to 370kA. It consists of two potlines with a total of 720 Reduction Cells (Pots) with a capacity of 738,000 tonnes of Liquid Metal.

Casthouse contains fifteen holding furnaces, three Billets, five Ingots, five Slabs and two re-melt furnaces. All the holding furnaces are operated by natural gas as a combustion system. The rolling mill is located adjacent to the Maaden Aluminium Smelter and is designed to produce Flat Rolled Products (FRP). The project's intended annual total capacity is to commence at around 380 kt. The Facility includes a Can Reclamation Unit, a hot rolling line, a cold rolling line, and a finishing line.

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	High	Medium	HIGH
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	High	High	Medium	HIGH
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity's activities are guided via strong governance principles, robust risk management practices, and a firm commitment to complying with all applicable local and international standards and laws. An appropriate Compliance framework has been implemented, supported by a defined organisational structure, adequate resources, and established compliance mechanisms. A digital platform is used to document legal and other requirements, enhance awareness, and maintain records across all business functions. The Entity's Group publishes an Integrated Annual Report that includes information on compliance reporting at: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
1.2 Anti-Corruption	Conformance	The Entity has established Policies and procedures to prevent and address Corruption in all its forms, supported by a robust group governance structure. The compliance framework encompasses the Code of Conduct, conflict of interest management, and a zero-tolerance approach to Bribery and Corruption, including extortion, in alignment with Applicable Law and prevailing international standards. The Compliance framework, including the Anti-Corruption Policy, is available at: https://www.maadens.com.sa/en/about/compliance and https://axvpvthrz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/pages/corporate-governance/compliance/anti-corruption-policy.pdf
1.3a-e Code of Conduct	Conformance	The Entity has established, documented, and implemented a Code of Conduct covering key workplace requirements, including environment, Health and Safety; ethical business practices; protection of information and assets; government relations; communication and media; as well as monitoring and compliance mechanisms. The Code of Conduct is available at: https://axvpvthrz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/pages/corporate-governance/compliance/code-of-conduct-handbook-en.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has documented and implemented the Sustainability Policy, Human Rights Policy, Diversity, Equity & Inclusion (DE&I) Policy, and the Group Environment, Health, Safety and Security (EHSS) Policy, all of which have been endorsed by the Group President and Chief Executive Officer (CEO). The Entity has also established its own EHSS Policy and Aluminium Stewardship Initiative (ASI) Policy, which are endorsed by the respective Presidents. The Entity's EHSS Policy is subject to regular review. These Policies are aligned with environmental, health and safety, social, and governance practices, as outlined in the ASI Performance Standard. The Group Policies are available at: https://www.maadens.com.sa/en/sustainability/social and;

CRITERION	RATING	COMMENT
		https://www.maaden.com.sa/en/sustainability/ehs The Entity communicates its Policies externally through its website and email channels. The policies are communicated internally via the intranet, displayed at prominent locations across the site, and included in employee induction training. Awareness of these policies among employees was found to be adequate during the Audit.
2.2a-c Leadership	Conformance	The Entity has nominated the Central Environment Manager as the Senior Management Representative which assigns overall responsibility and authority to ensure compliance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established, documented, and implemented an Environmental Management System in accordance with ISO 14001:2015 and maintains certification across all legal entities within the Aluminium business.
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	The Entity has established various policies and procedures addressing different elements of a Social Management System. It was identified that the Entity however has not yet developed a structured Social Management System that addresses key requirements, including the establishment of social objectives and targets, internal audits of social policies and procedures, social performance monitoring, and management reviews.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Due Diligence Risk Assessment Policy and a Supplier Code of Ethics and Conduct to ensure that business activities with suppliers and partners promote responsible sourcing principles, addressing Environmental, Social, and Governance (ESG) considerations, including the use of independent Due Diligence tools. The Supplier Code of Conduct is available at: https://axvpvthrjz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/pages/corporate-governance/compliance/suppliers-code-conduct-ethics.pdf The Entity has also adopted a Responsible Sourcing Management System developed by an external consulting firm, aligned with the London Metal Exchange (LME) Responsible Sourcing requirements. Supplier and contractor relationship management is administered through the Entity's supplier portal, available at: https://www.maaden.com.sa/en/eservices/supplier
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes to existing facilities have been undertaken. The Entity has however established a system to conduct Environmental, Social, Cultural, and Human Rights assessments for all New Projects and expansions of existing projects.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion does not apply to the Entity, as no New Projects or Major Changes to existing Facilities have been undertaken. The Entity has however established a system to conduct Environmental, Social, Cultural, and Human Rights assessments for all New Projects and expansions of existing projects.

CRITERION	RATING	COMMENT
2.7a-f Emergency Response Plan	Conformance	The Entity has established and implemented Emergency Response Plans for its Ras Al-Khair integrated Aluminium complex and Al Ba'itha mine. In addition, the Entity has developed a specific Environmental Emergency Response Plan in collaboration with the regulator in Ras Al-Khair, as required for refinery operations. The involvement of Workers, the Community, and relevant representatives, as applicable, is demonstrated in the development and implementation of these Plans. The Emergency Response Plans are made available to Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	The Entity's Business Resilience Plan is integrated into its Emergency Response Framework and Business Continuity Management (BCM) Policy, ensuring that the organisation is prepared to effectively identify, assess, and respond to potential risks and threats to its operations.
2.9a-b Mergers and Acquisitions	Conformance	The Entity, at the Group level, has established a Due Diligence Risk Assessment Policy and Procedure, which is applied to all dealings with third parties. This procedure is also applicable to Mergers and Acquisitions (M&A), should such a need arise. Currently, no M&A activities are included in the Entity's business plan. The Due Diligence process incorporates Environmental, Social, and Governance (ESG) considerations and is implemented through a formal risk assessment approach.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity does not currently have plans for closure, decommissioning, or divestment at Ras Al-Khair Industrial City, where it operates the Alumina refinery, smelter, and rolling mill. The Entity has prepared a preliminary closure plan for the Al Ba'itha mine through a third-party consultant and the outcomes of this report are actively utilised to inform planning for closure, decommissioning, and divestment activities, with consideration of ESG, including the required financial provisions.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has published its Group Annual Integrated Report in accordance with the Global Reporting Initiative (GRI) Standards (Core option). The Report includes the outcomes of a Materiality assessment and discloses the Entity's Material environmental, social, governance, energy, and economic impacts. The Annual Integrated Report is available at: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
3.2 Non-compliance and Liabilities	Conformance	Via the parent Group, the Entity publishes an Annual Integrated Report and Sustainability Report that publicly disclose information on significant fines, judgments, penalties, and non-monetary sanctions arising from non-Compliance with Applicable Law. Details of any monetary fines and non-monetary sanctions related to declarations, environmental laws, or regulatory requirements are disclosed in the 2025 Annual Integrated Report (page 72), available at: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf

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		The Annual Integrated Report also includes management declarations covering various topics, which are publicly accessible via the same link.
3.3a-c Payments to Governments	Conformance	Under its Group Policies and procedures, the Entity has implemented systems to ensure that payments to any party, including the Government, are made solely on a legal and/or contractual basis. All payments made or provisioned to be made to the Government in accordance with applicable legal requirements are disclosed in the Annual Report. Payments related to Bauxite mining activities are reported in the Entity's Group Annual Report (page 118), which is independently verified by external auditors in line with financial reporting requirements. The Annual Integrated Report is available at: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established a Whistleblowing Policy that enables Stakeholders to raise complaints. This system is accessible to all Stakeholders through the Group's website and provides a toll-free number and email channel for submitting concerns: https://secure.ethicspoint.eu/domain/media/en/gui/104569/index.html In addition, the Entity has implemented grievance and medical Policies that allow employees to raise workplace-related concerns. A specific community grievance handling procedure has also been established for the Al Ba'itha mine, enabling local communities to submit grievances. All complaints are formally investigated, and appropriate corrective actions are taken where necessary.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has engaged a third-party consultant to conduct a comprehensive Life Cycle Assessment (LCA) for all its products using the GaBi (LCA for Experts) software tool. The assessment has been completed, and final reports have been issued.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity discloses summary information on product life cycle assessments (LCA), with a primary focus on greenhouse gas (GHG) emission intensities, in its Sustainability Report 2024 (page 127), available at: https://axvpvthrjz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/reports/sustainability-reports/maaden--sustainability-report-2024-31.pdf The Entity provides LCA Reports for its Products to customers upon request.
4.2 Product Design	Conformance	The Entity operates a rolling mill that produces auto sheet coils, can body coils, and end and tab products. No new Products have been developed since the commissioning of the facility. A Best Available Techniques (BAT) assessment was conducted during the design phase of the facility through an external consultant. This assessment aimed to ensure the application of the most effective and advanced production processes, technologies, and operational

CRITERION	RATING	COMMENT
		practices to prevent, or, where not practicable, minimise emissions, discharges, and other environmental impacts. Existing products are manufactured using recycled materials, thereby supporting resource efficiency and environmental sustainability.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established process control parameters across its plants to reduce the generation of Aluminium Process Scrap. Operators are appropriately trained, and process control parameters are monitored regularly to ensure effective implementation. The Entity has mapped Scrap generated from various sources within the Cast House and rolling mill, and this information is captured in the Scrap Management System. The Entity recycles 100% of its generated Scrap through the Can Reclamation Unit (CRU) and the Cast House furnace. In addition to internally generated Scrap, the Entity also recycles Scrap received from customers for rolled products. The Entity has documented and implemented a product identification and traceability procedure, which defines identification requirements for different product types. Alloys and product grades, including non-conforming products designated for recycling, can be tracked through identification labels or markings. The Entity does not outsource Scrap recycling, as it operates its own facility for processing Scrap material. The Entity has also established documented work instructions outlining requirements for the identification and handling of Scrap materials. During the site assessment component of this Audit, different types of Scrap were observed to be stored in designated bins with clear identification.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has engaged with various domestic and international Scrap dealers to increase the volume of Scrap materials for recycling in its Can Reclamation Unit (CRU). The Entity continuously expands its approved supplier list by adding new Scrap suppliers following the completion of Due Diligence assessments. In addition, the Entity procures Scrap generated from its own products by customers for recycling purposes. The quantity of Scrap procured is regularly measured, and the proportion of recycled material used in the rolling mill is monitored on a monthly basis.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's 2025 Integrated Annual Report presents its Greenhouse Gas (GHG) emissions and energy consumption data on a Group basis. Data relevant to the Group's Aluminium business is disclosed on page 54 of the 2025 report. The information presented in this report has been independently verified.

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		The 2025 Integrated Annual Report is available at: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as its smelter operations commenced prior to 2020.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Conformance	The Entity's Products have achieved GHG intensities of less than 11 tonnes of CO₂e per tonne of Aluminium. In addition, the Entity has developed plans to further reduce GHG emission intensities as part of its continuous improvement initiatives to achieve its strategic sustainability objectives and goals. The Entity is currently in discussions with third parties to establish renewable energy sources for the smelter. These initiatives are in the early stages and will be subject to feasibility studies.
5.3a GHG Emissions Reduction Plans	Minor Non-Conformance	The Entity aims to reduce its Scope 1 and Scope 2 GHG emission intensity by 60% by 2040 and achieve net zero by 2050. Despite projected emissions of approximately 23 million tonnes of CO₂ by 2040, driven by planned production scale-up under current technology, the Entity's reduction strategy seeks to limit emissions to approximately three million tonnes by 2040. This reduction plan includes enhancing recycling efforts (expected to reduce emissions by 23%), developing new low-emission greenfield operations (44%), and retrofitting existing brownfield operations (34%). These reduction plans are disclosed in the Sustainability Report 2024 (page 23): https://axvpvthrz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/reports/sustainability-reports/maaden--sustainability-report-2024-31.pdf And in the Integrated Report 2025: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf The Entity has adopted 2020 as its baseline year and used the ASI GHG Pathway Tool to establish its emissions reduction trajectory. The 'cradle-to-gate' emissions data used for the baseline year is not however considered reliable, as the underlying Life Cycle Assessment (LCA) contains identified gaps and inaccuracies. At the time of the Audit, the revised LCA had not yet been finalised, and the ASI GHG Pathway Tool had not been recalculated using verified and complete baseline data.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity aims to reduce its Scope 1 and Scope 2 GHG emission intensity by 60% by 2040 and achieve net zero by 2050. Despite projected emissions of approximately 23 million tonnes of CO₂ by 2040, driven by planned production 'scale-up' under current technology, the Entity's reduction strategy seeks to limit emissions to approximately three million tonnes by 2040. This reduction plan includes enhancing recycling efforts (expected to reduce emissions by 23%), developing new low-emission operations (expected to reduce emissions by 44%), and retrofitting existing operations (expected to reduce emissions by 34%).

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		These reduction plans are disclosed in the Sustainability Report 2024 (page 23): https://axvpvthrjz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/reports/sustainability-reports/maaden--sustainability-report-2024-31.pdf And in the Integrated Report 2025: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf During this Audit, it was observed that the Entity's five-year emissions reduction targets are on track and remain well within the projected reduction pathway.
5.4 GHG Emissions Management	Conformance	The Entity has implemented Management Systems to identify GHG emissions, assess the significance of associated impacts, and evaluate them in the context of existing operational controls established through standard work instructions. Where necessary, additional action plans are implemented to further limit direct GHG emissions.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has implemented management system procedures and controls to identify, evaluate, monitor, and measure Emissions to Air that may have adverse impacts on the environment and human health. Emissions from various sources and processes are monitored and reported internally and externally against established limits. These include both internal limits for performance improvement and external limits for regulatory Compliance. Internal limits for air emissions have been established as part of a continuous improvement approach, supported by frameworks such as Kaizen and capital improvement initiatives through targeted projects. The Entity's performance related to non-GHG air emissions is disclosed in the 2025 Integrated Annual Report, page 55: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
6.2a-g Discharges to Water	Conformance	The Entity operates as a zero process-water discharge facility and does not have any direct discharges to water across its operations. A Natural Engineered Wastewater Treatment (NEWT) facility has been established at the smelter site to treat both process and sanitary wastewater, with the treated water being fully reused. As a result, there is no requirement to quantify or report process water discharges that could have adverse impacts on human health or the environment. Disclosures related to water management are provided in the Integrated Report 2025, under the Water Stewardship section, pages 56 – 60: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted Environmental Aspect and Impact Assessments for all plants as part of its Environmental Management System. These assessments include consideration of Spill and Leakage risks, as well as their potential impacts on air, water, and soil, based on defined evaluation criteria. The Entity has also completed a Process Hazard Analyses (PHA) for all plants, whereby process failures—

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		including those that may lead to potential Spills and Leakages are systematically assessed. The Entity has established a spill response plan that outlines mitigation actions and includes both internal and external communication requirements. Control measures to prevent Spill incidents have been defined and documented within the impact registers, following the hierarchy of controls approach. The Entity has also implemented an area monitoring system, enabling field operators to detect and report any spills within the facility. Employees have been trained on preventive control measures as well as on the procedures outlined in the Spill response plan.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has established a spill response plan that outlines the requirements for timely disclosure to affected parties regarding the potential impacts of significant Spill incidents. Roles and responsibilities for such communication are clearly defined within the plan. The Entity's Integrated Report 2025 (page 82), and the 2025 Sustainability Handbook provide disclosures on Spills and Leakages, including the number of incidents, volume, type, associated impacts, and remediation actions taken: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf and https://axvpvthrz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/reports/sustainability-reports/2025-maaden-sustainability-report-en.pdf
6.5a-c Waste Management and Reporting	Conformance	The Entity has established a Waste management procedure that addresses requirements for Waste minimisation, recycling, classification, storage, and disposal in accordance with the Waste Mitigation Hierarchy. The Entity has defined Waste intensity targets and implemented corresponding action plans across all plants to reduce Waste intensity. Performance is monitored on a monthly basis. The Entity has disclosed Hazardous and Non-Hazardous Waste generation and disposal in the 2025 Integrated Annual Report, page 57: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
6.6a-g Bauxite Residue	Conformance	The Entity has designed and constructed a 'state-of-the-art' Bauxite residue storage facility with the support of an internationally renowned engineering consultant. The storage cells are equipped with a triple-layer liner system to prevent leachate infiltration. The facility has received approval from the regulatory authority, and boreholes have been installed at various locations to enable periodic monitoring of water quality. Groundwater wells across the storage area are monitored annually, and the results to date have shown no evidence of leachate impacting groundwater. Since December 2019, the Entity has engaged an independent Third Party to conduct integrity assessments of the embankment walls of the Bauxite residue storage cells. The assessment results confirm that the embankments have adequate strength and that no stability- or settlement-related failures are expected. The Entity does not discharge any water recovered from the Bauxite residue storage facility. Recovered water is stored in a dedicated

CRITERION	RATING	COMMENT
		pond designed with a triple-layer lining system and is reused for dust suppression and moisture control. Bauxite residue is transported to the storage cells via pipelines, and no discharge of residue to any aquatic or marine environment has occurred. The Entity is also exploring alternative uses for Bauxite residue by assessing its potential for blending with gypsum produced from a nearby phosphate plant, with testing of samples of the blended material is currently underway.
6.7a-f Spent Pot Lining (SPL)	Conformance	The Entity stores Spent Pot Lining (SPL) material in a dedicated facility designed with paved flooring to prevent leachate and fully covered to eliminate any risk of water ingress. SPL is stored temporarily before being transported to a cement mill, where it is utilised in the concrete batching process. The Entity recovers carbon and refractory materials from SPL through a 'first-cut' process, with the recovered material sent to the cement mill for use as fuel. Samples from 'second-cut' material have also been provided for trial applications. A dedicated task force has been established to manage SPL, with a focus on identifying alternatives to landfilling. Trials for the reuse of refractory materials in cement plants have been initiated. The Entity does not dispose of SPL in landfills, nor discharges to marine or aquatic environments.
6.8a-d Dross	Minor Non-Conformance	The Entity has an agreement with the Radian Oil & Gas Services Company ('Radian') which has developed and now operates a Facility for the treatment and recovery of Dross; the Facility has been operated since early 2026. The facility currently processes white Dross, with plans to process black Dross in the future. The Dross processing Facility holds a valid Environmental Permit to Operate. All white Dross produced is fully recycled, with no residue sent to landfill. Radian is also exploring the use of Dross residue in cement with a local cement manufacturer. The Entity's agreement with Radian requires residual Dross to be suitable for reuse in cement or steel production. Black Dross is currently exported to international companies, and a sample export agreement was reviewed as part of this Audit. The Entity has established a process to conduct Due Diligence on organisations receiving white and black Dross to ensure environmentally sound management and compliance with applicable regulatory requirements. Whilst Due Diligence records were available for white Dross recipients, there was no evidence however that demonstrated Due Diligence had been completed for black Dross recipients before engagement. This indicates that the Due Diligence process has not been consistently implemented across all Dross recipients.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity sources water from a third-party desalination provider for its smelter operations and from groundwater wells for its mining activities. Water consumption is monitored on a monthly basis. The Entity has mapped water withdrawal and usage by source and type across all business units and operations. This information is

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		disclosed in the Annual Integrated Report 2025, page 56: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf The Entity has assessed water-related risks within the watersheds in its Area of Influence through Environmental Impact Assessments (EIAs) conducted by third parties for both the Ras Al-Khair smelter site and the Al Ba'itha mine, covering both construction and operational phases. For the Ras Al-Khair site, risks have been evaluated as low, as the Entity does not extract groundwater and does not discharge process water. For the Al Ba'itha mine, the impact of water abstraction from the Minjur Aquifer has been assessed as significant, as the aquifer does not readily recharge and continued extraction may lead to permanent depletion of the resource.
7.2a-e Water Management	Conformance	The Entity has established time-bound targets to reduce water intensity as part of its sustainability goals. Water is not identified as a Material risk for the Ras Al-Khair Aluminium plant. For the Al Ba'itha mine, water consumption has been assessed as a Material risk, and mitigation actions have been implemented, including initiatives such as chemical crusting with 'Nalco Water' to reduce dust and minimise water usage. Consequently, actual water consumption has been significantly lower than expected, as reported in quarterly monitoring reports. The Entity's water stewardship approach and performance is disclosed in its 2025 Annual Integrated Report: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has partnered with an independent firm to conduct a technical assessment, which includes a Biodiversity risk assessment of the Ras Al-Khair plant and the Al Ba'itha mine, both of which are located in the Arabian Desert Ecoregion. A Technical Report on Integrating Biodiversity and Ecosystem Services in Policies and Operations of Extractive Industries was prepared for the Entity by Staterra in 2025. The Entity has also commissioned an assessment for 2026, which was reviewed during this Audit. Historically, the Entity has conducted supplementary Environmental Impact Assessments (EIAs) for both the smelter site and the Al Ba'itha mine to evaluate impacts on Biodiversity, in accordance with the International Finance Corporation Performance Standard 6 (IFC PS6), covering both the construction and operational phases.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity is addressing its Biodiversity and ecological rehabilitation challenges through the development and implementation of risk and impact policies and practices that support the preservation of the ecosystems on which it depends, from exploration and feasibility studies through to site closure. The Entity collects and analyses the opinions and perspectives of relevant Stakeholders regarding its policies and procedures for integrating Biodiversity and Ecosystem Services into corporate policies and operations. This approach aims to enhance the Entity's

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		environmental performance, reduce operational and financial risks, and strengthen Stakeholder engagement.
8.2a-g Biodiversity Management	Conformance	The Entity has commissioned an independent firm to develop its Biodiversity Management framework, including a Biodiversity Action Plan. This is based on the Entity's Biodiversity and Ecosystem Services Assessment, which aims to integrate Biodiversity and Ecosystem Services management into decision-making processes to reduce operational and financial risks. Disclosure of Biodiversity performance and management is included in the Entity's Annual Integrated Report 2025, page 59, available at: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
8.3a-c Management of Priority Ecosystem Services	Conformance	The Entity maximises the resource efficiency of priority Ecosystem Services by applying a mitigation hierarchy approach, as outlined in its Rapid Ecosystem Services Assessment (ESA) framework. This approach involves avoiding impacts where possible, minimising impacts that cannot be avoided, and offsetting residual impacts that cannot be avoided or minimised.
8.4 Alien Species	Conformance	The Entity prevents the introduction of Alien Species by conducting regular surveys and inspections, and by working closely with relevant Stakeholders such as the National Centre for Wildlife (NCW) and the National Centre for Environmental Compliance (NCEC) to oversee the protection and management of Biodiversity and wildlife across its sites and overall Area of Influence.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not have any plans to develop or explore new mines. It has however established a process to conduct Environmental Impact Assessment (EIA) studies in accordance with the International Finance Corporation Performance Standards (IFC PS) for any future projects. The Environmental Impact Assessments for the Ras Al-Khair Aluminium plant and the Al Ba'itha mine concluded that there are no World Heritage Sites within the Areas of Influence of either site.
8.6a-d Protected Areas	Conformance	The Entity has identified Protected Areas and implemented specific measures to minimise its impact on these areas. It has recognised the importance of such areas and is committed to engaging with local communities and relevant government authorities to address any potential impacts on these sanctuaries. As disclosed in the Annual Integrated Report 2025 (pages 59 – 60), the Entity has committed to minimising the negative impacts of its operations on Biodiversity and aims to refrain from operating in Protected Areas unless appropriate protective measures are in place: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
8.6e Protected Areas – Bauxite Mining	Conformance	The Entity respects Protected Areas by implementing specific measures to minimise its impact and by engaging with local Communities and relevant government authorities to address any potential impacts on these sanctuaries. As disclosed in the Annual Integrated Report 2025 (pages 59 – 60), the Entity has committed to minimising the negative impacts of its operations on Biodiversity and aims to refrain from operating in

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		Protected Areas unless appropriate protective measures are in place: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
8.7a-i Mine Rehabilitation	Conformance	The Entity has established a Mine Closure Plan (MCP), developed in consultation with Stakeholders. The plan defines timelines for mine closure and progressive rehabilitation and includes an estimate of closure costs. As observed during the Audit, progressive rehabilitation has commenced, with mined areas being progressively backfilled and topsoil restored. Financial provisioning is undertaken in accordance with the Standardised Closure Cost Estimator (SRCE) model. Disclosures related to mine rehabilitation and closure planning, including budget allocations, are included in the Entity's Annual Integrated Report 2025, page 60: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has defined its Code of Conduct, which includes a commitment to respecting Human Rights as recognised by Islamic Sharia and United Nations Human Rights conventions, including those of the International Labour Organization (ILO), to the extent adopted by Saudi Arabia. All employees receive annual training on the Entity's Code of Conduct: https://www.maaden.com.sa/en/about/compliance The Entity maintains a documented social risk register in which potential Human Rights-related risks are assessed and corresponding mitigation actions are defined. The Entity has conducted supplementary Environmental Impact Assessments for the Al Ba'itha mine and the Ras Al-Khair plant site to identify and mitigate social risks, including potential Human Rights violations affecting local Communities. To manage Human Rights-related risks across its supply chain, the Entity has implemented various levels of Due Diligence checks based on predefined criteria. The Entity continues to implement its Responsible Sourcing and Social Management System in alignment with SA8000 (Social Accountability International), which covers all major criteria related to Human Rights Due Diligence. There have been no cases identified to date where a violation of any Human Rights requiring remediation.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established Human Resources policies and procedures, including an Employment Policy, Salary Administration Policy, Performance Management Policy and Talent Development Policy, which ensure equal opportunities for women. These practices contrast with the broader cultural context in Saudi Arabia under Sharia law, where certain women's rights, as defined in the UN Guiding Principles on Business and Human Rights, may not be fully realised. The Salary Administration Policy and Performance Management Policy clearly define the criteria for salary grading and promotions, which are based on performance rather than gender. The Entity's Code of Conduct further reinforces its commitment to respecting Human Rights in accordance with applicable labour laws. Additional information on Diversity and Inclusion including the Entity's diversity performance is available in the Annual Integrated Report

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		2025 (pages 62 and 79): https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there is no presence of Indigenous Peoples or their lands, territories, and resources within the Entity's Area of Influence. The Entity's supplementary Environmental Impact Assessment (EIA) reports for its facilities confirm that no Indigenous communities are present at either site.
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 is no presence of Indigenous Peoples or their lands, territories, and resources within the Entity's Area of Influence. The Entity's supplementary Environmental Impact Assessment (EIA) reports for its facilities confirm that no Indigenous communities are present at either site.
9.4b Free, Prior, and Informed Consent (FPIC) – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity, as there is no presence of Indigenous Peoples or their lands, territories, and resources within the Entity's Area of Influence. The Entity's supplementary Environmental Impact Assessment (EIA) reports for its facilities confirm that no Indigenous communities are present at either site.
9.4c Free, Prior, and Informed Consent (FPIC) – Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there is no presence of Indigenous Peoples or their lands, territories, and resources within the Entity's Area of Influence. The Entity's supplementary Environmental Impact Assessment (EIA) reports for its facilities confirm that no Indigenous communities are present at either site.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no cultural or sacred heritage sites within the Entity's Area of Influence. The Entity conducted Environmental Impact Assessments (EIAs) for its facilities during the project stage. These assessments included an evaluation of potential impacts on cultural and sacred heritage and concluded that no archaeological or cultural heritage sites are present within the Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there is no presence of cultural or sacred heritage within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity has conducted Environmental and Social Impact Assessments (ESIAs) in accordance with the International Finance Corporation (IFC) Performance Standard 5 (PS5). These assessments included an evaluation of alternative locations for the smelter site. The assessment concluded that no resettlement was required, as the selected site is located within an industrial area and no Communities are present within the Area of Influence. For the mining site, the Entity conducted a supplementary Environmental Impact Assessment, which identified the need for resettlement of Al Ba'itha village. The resettlement was carried out by the Kingdom of Saudi Arabia (KSA) Government through a Royal Decree, with participation from multiple ministries and representation from both the Entity and the local Community. To support this process, the Entity established and implemented a Resettlement Complementary Plan for the Al Ba'itha community. The resettlement process was completed in December 2015. Most actions

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		under the Complementary Plan have been finalised, with two ongoing actions currently being monitored and tracked.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has identified potential impacts on local Communities through a structured Environmental and Social Impact Assessment (ESIA), which addresses both legal and customary rights. For the smelter site, no negative impacts on local Communities were identified, as the Facility is located within an industrial area. For the mining site, following the resettlement of the former Al Ba'itha village, the nearest local community is located approximately 50 kilometres from the operational area. There are no rural or remote communities within the Area of Influence that depend on resources affected by the Entity's operations. The Entity has implemented measures, in consultation with relevant Stakeholders, to support the livelihoods of nearby communities. These communities are located approximately 45 to 50 kilometres from the site. Key initiatives include providing preferential employment opportunities to eligible individuals from the local Community and promoting the use of local suppliers.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity does not operate in Conflict-Affected and High-Risk Areas (CAHRAs). It has developed a comprehensive and 'fit-for-purpose' management framework for responsible sourcing, aligned with international good practices, enabling risk-based Due Diligence across its supply chain. The Due Diligence process considers key risk factors, including sanctions risk, state ownership risk, politically exposed persons (PEP) risk, enforcement and fines risk, and liquidity risk.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has completed initial data gathering from supply chain mapping, materiality, and risk assessment and identified key risk areas in its supply chain. The assessment is based on key risks as identified by the Entity, OECD Guidelines, the ASI Performance Standard V3.1 and other relevant industry initiatives and standards.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has completed initial data gathering, including supply chain mapping, materiality assessment, and risk assessment, to identify key risk areas within its supply chain. The Entity has subsequently developed and implemented management procedures to effectively respond to identified risks.
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	Whilst Due Diligence disclosures are included in the Entity's 2024 Sustainability Report and partially addressed in the 2025 Annual Integrated Report, detailed public disclosure and specific alignment with the Entity's updated Responsible Sourcing Manual are not fully demonstrated.
9.9 Security practice	Conformance	The Entity does not engage any public or private security service providers. Instead, it utilises its own security team, which is approved by the regulatory authority. All personnel receive Code of Conduct

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		training upon commencing employment, with refresher training conducted annually.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as it complies with Freedom of Association and rights to Collective Bargaining under Saudi labour law.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established several alternative mechanisms for Workers to associate and raise their concerns collectively, including the formation of Environment, Health, and Safety (EHS) teams, conducting 'town hall' meetings with broad worker participation, and organising shift group meetings.
10.2a-c Child Labour	Conformance	The Entity has established a minimum working age of 18 years, which is applicable to all direct and indirectly hired employees. The Entity continues to improve its Responsible Sourcing and Social Management System in alignment with SA8000 (Social Accountability International), covering key criteria related to Human Rights Due Diligence, including the prevention of Child Labour.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity has established policies to prevent Forced Labour, human trafficking, and Worker debt bondage. It ensures transparent recruitment processes and prohibits the collection of employee documents, deposits, or recruitment fees. Additionally, the Entity provides voluntary housing loans, ensures freedom of movement, and adheres to applicable Labour laws regarding employee resignation. The Entity continues to improve its Responsible Sourcing and Social Management System in alignment with SA8000 (Social Accountability International), covering key criteria related to Human Rights Due Diligence, including the prevention of Forced or Compulsory Labour. While the Entity has made efforts to address requirements related to Forced Labour, a Modern Slavery Statement has not yet been developed or publicly disclosed. This aspect is currently being addressed as part of the Entity's Social Management System.
10.4a-c Non-Discrimination	Conformance	The Entity has established and implemented a Code of Conduct that promotes the fair treatment of all employees and prohibits discrimination. The Entity has also developed and implemented policies and procedures covering recruitment, performance management, compensation and benefits, salary administration, talent development, workplace behaviour, and 'end-of-service' benefits. These policies are applied consistently and equitably to all employees, regardless of gender.
10.5 Communication and engagement	Conformance	The Entity has established a procedure for consultation, participation, and communication, which defines the mechanisms and channels for employee engagement and communication. Employee consultation and participation are facilitated through various platforms, including toolbox talks, Environment, Health and Safety (EHS) meetings, 'town hall' meetings, and employee engagement surveys. The Entity has also documented a grievance committee procedure that addresses grievances related to performance appraisals, violations, and promotion matters. The Entity has engaged a private

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		firm to conduct an annual employee engagement survey. The results of the June 2025 survey were communicated and indicated satisfactory outcomes.
10.6a-g Violence and Harassment	Conformance	The Entity has established a Code of Conduct that clearly outlines its Policy on Harassment and Bullying. In addition, the Entity has documented a Disciplinary Action Procedure in accordance with Saudi Labour law. The Entity has also implemented a 'whistleblowing' mechanism, including a dedicated hotline and email available on its public website, to enable Stakeholders to report any violations of the Code of Conduct: https://secure.ethicspoint.eu/domain/media/en/gui/104569/index.html ! The Code of Conduct handbook is also available at: https://oxvpvthrz64.compat.objectstorage.me-jeddah-1.oraclecloud.com/maaden-website-assets/pages/corporate-governance/compliance/code-of-conduct-handbook-en.pdf
10.7a-c Remuneration	Conformance	The Entity has established salary ranges for its directly hired employees that comply with Saudi Labour law. The Entity has conducted a wage survey with peer industries to benchmark salary ranges across different grades. Salaries are paid monthly to employees through bank transfers without delay. Salary slips are provided to each employee, detailing allowances and deductions, where applicable. There is no minimum wage specified under Saudi Labour law for expatriate employees. The Entity has however established a minimum wage for indirectly hired workers based on common industry practices, to ensure that wages paid are sufficient to meet basic needs and provide some discretionary income. The Entity continues to improve its Responsible Sourcing and Social Management System in alignment with SA 8000 (Social Accountability International), which covers key criteria related to Human Rights Due Diligence, including remuneration.
10.8a-c Working Time	Conformance	The Entity has established a Policy on Working Hours and Overtime in accordance with Saudi Labour law. Various controls have been implemented to minimise overtime hours, and regular monitoring is conducted for each employee to ensure compliance with prescribed limits. Overtime is performed on a voluntary basis and is compensated at a premium rate in line with Saudi labour law. The Entity continues to improve its Responsible Sourcing and Social Management System in alignment with SA8000 (Social Accountability International), which addresses key human rights due diligence requirements, including Working Time.
10.9a-b Informing Workers of Rights	Conformance	The Entity provides induction sessions to all incoming Workers, during which the Code of Conduct is a key component of the onboarding process. The Code of Conduct outlines Workers' rights, including fair employment opportunities and practices, non-Discrimination, fair compensation, talent recognition and development, health care and other benefits, maximum working hours, and the right to raise complaints and grievances without fear of prejudice or retaliation.

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11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established an Occupational Health and Safety (OH&S) Management System in accordance with the ISO 45001:2018 Standard across all three legal entities within the Aluminium business, namely Maaden Bauxite and Alumina Company, Maaden Aluminium Company, and Maaden Rolling Company. The certifications are valid and subject to annual surveillance audits. Audit findings are systematically addressed by the Entity through the implementation of corrective action plans, ensuring continual improvement and ongoing compliance with the requirements of the standard.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	All three legal entities within the Entity are certified to the ISO 45001:2018 Standard and maintain their certifications. The Entity also actively participates in the Gulf Aluminium Council, where regional Aluminium manufacturers collaborate and benchmark their operations across various areas, including Health and Safety, to drive continuous improvement. Health and Safety management approaches and performance indicators, including leading and lagging indicators, are disclosed in the Entity's Annual Integrated Report 2025, page 66: https://www.saudiexchange.sa/Resources/fsPdf/370_0_2026-03-29_11-05-45_En.pdf
11.2 Employee engagement on Health and Safety	Conformance	In addition to toolbox talks conducted at the start of each shift—where Workers are given the opportunity to raise Health and Safety concerns and provide suggestions, the Entity also encourages Workers to submit 'Stop Story' forms. These forms document instances where workers proactively stop work based on observations that may lead to unsafe working conditions.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	16 July 2021	Initial Certification Audit – Full Certification
1	16 July 2024	Re-Certification and Scope Change Audit – Full Certification. Scope Change to apply the ASI Performance Standard V3.
2	10 September 2026	Surveillance Audit – name change of Entity from 'Ma'aden Aluminium' to 'Maaden Aluminium'