### sustainable development report









### Introduction and overview

Sustainable development enables corporate citizens to prosper in a responsible manner and within a framework that safeguards both their and future generations' long-term sustainability. It requires the identification and active management of those issues that could materially affect the long-term successful existence of the enterprise in the context of all stakeholders – including, not exhaustively, shareholders and institutional investors, consumers, employees, customers, suppliers, government, unions, and local communities.

AVI Limited ("the Company") has a well-constructed governance framework that enables it to identify and manage material sustainability issues. The Company operates in a manner that ensures that the needs of the present generation of stakeholders are met without compromising future generations.

Sustainability matters are monitored and managed, for example, by the appropriate diversity committee, health and safety committee, internal review committee, audit and risk committee, or social and ethics committee, while the overarching responsibility for matters before these committees remains vested with the Company's board of directors ("Board").

Sustainability matters that are deemed to be of a material nature, or that require heightened focus, are

elevated to the Board. Executives within the Company remain responsible for specific matters and are held accountable for their successful implementation and management.

The Company considers its sustainability responsibilities under three broad categories:

- Ethics ethics are the foundation of an effective and sustainable organisation that must operate without censure or compromise over the long term. Proper ethics and appropriate values are central to the Company's culture and therefore to the behaviour of its employees. They assist in establishing a willingness to accept and respond to broader issues in our society, forming the basis of the Company's interactions with its stakeholders.
- Scarce resources, biodiversity, and environmental in order to ensure that future generations have access to the resources on which the Company is reliant, and that the Company's viability is not compromised in the long term, the Company is intent on carefully managing those scarce resources relevant to its operations, where practical, and ensuring that its operations do not detrimentally impact vulnerable and/or endangered natural habitats, wildlife, or local communities. The Company is committed to the application of sustainable practices across its operations.

• Transformation and good corporate citizenship – the Company recognises the moral, social, and economic imperatives to embrace and support transformation in South Africa and to be regarded as a valuable participant in the South African economy and society. The Company also recognises the need to be, and to be seen as, a good corporate and socially responsible citizen that is desirable to do business with.

### **Guiding framework**

The following guidelines and/or standards were consulted when compiling this report:

- The King IV Report on Corporate Governance for South Africa, 2016 ("King IV report");
- The Listings Requirements of the JSE Limited ("Listings Requirements");
- The JSE Responsible Investment Index criteria; and
- The Global Reporting Initiative ("GRI") framework.

While the King IV report and Listings Requirements require the Company to prepare an integrated report, various other reporting frameworks deal with sustainability reporting criteria. The GRI framework and JSE Responsible Investment Index have been identified by the Company as appropriate frameworks for reporting on these issues based on the Company's specific needs, its areas of operation, and stakeholder concerns

During the year the Company identified material Group-wide issues for reporting purposes and an index indicating where these issues are referenced throughout this annual report can be found on page 68. While these issues have been categorised according to the GRI framework, the Company has not undertaken a detailed self-assessment nor been formally assessed, and the decision to use the GRI and JSE Responsible Investment Index frameworks for guidance in compiling this report is not intended to declare compliance as understood in either framework.

The Company remains committed to ongoing review and re-assessment of the scope of its reporting, as well as to regular consideration of the advisability and need for formal reporting or assessment against the accepted frameworks.

Disclosures on the Company's approach to managing the matters relating to the Company's sustainability can be found throughout the report either as an introduction to the relevant sections or as specific disclosures on relevant issues.

### Social and Ethics Committee

The Social and Ethics Committee was constituted in August 2011 in terms of the Companies Act No. 71 of 2008, as amended, and the Regulations thereto ("the Companies Act 2008"), and adopted formal terms of reference, delegated to it by the Board, as its charter. The charter is subject to the provisions of the Companies Act 2008 (in particular Section 72 as read with Regulation 43). The committee has discharged its functions in terms of its charter, and in particular reviewed the Company's activities, having regard to relevant legislation and other legal requirements and best practice, relating to:

- Social and economic development;
- · Good corporate citizenship;
- The environment, health, and public safety;
- Consumer relationships;
- Labour and employment; and
- The Company's ethics codes and performance.

The committee has unrestricted access to all Company information, employees, and directors and is authorised, after discussion with the Chairman of the Board where necessary, to investigate any matters within its terms of reference; seek external professional advice; secure the attendance of relevant consultants at its meetings; and implement policies approved by the Board. In addition, the committee has the mandate to bring matters within its remit to the attention of the Board and to report back to shareholders at the Annual General Meeting.

For further details regarding the composition and meetings of the committee, shareholders are referred to the Corporate Governance Report on page 87.

### Stakeholder engagement

Stakeholder engagement is an important aspect of the Company's sustainability responsibilities and it formally identifies and recognises material stakeholders with legitimate interests with whom it engages on relevant issues. Engagement with these stakeholders takes a variety of forms, depending on the matter at hand, and may vary in frequency. Where key topics and concerns are raised through such stakeholder engagements, the Company responds to the relevant stakeholders in a variety of ways, including directly or through its annual reporting. The table below lists the more obvious stakeholders and provides examples of the nature of the engagements that the Company has with them.

Stakeholder type	Nature of the engagement
Shareholders, analysts and media	<ul> <li>Annual General Meeting at which shareholders have an opportunity to vote on material resolutions, including the appointment and remuneration of directors</li> <li>Distribution of information via the website, including financial, brand, governance, social, ethics, and sustainability matters</li> <li>Press releases and SENS announcements</li> <li>Formal presentation of the half year and final financial results to the investment community</li> <li>Integrated Annual Report</li> <li>Interviews and media briefings</li> <li>Scheduled bi-annual meetings with analysts</li> <li>Ad hoc meetings with analysts and investors, both locally and overseas, as required</li> <li>Meetings to resolve queries on specific matters as required</li> </ul>
Customers and consumers	<ul> <li>Daily contact in own and customers' stores</li> <li>Meetings</li> <li>Consumer and product research</li> <li>Marketing campaigns</li> <li>Websites and social media platforms</li> <li>Customer care and complaint lines</li> <li>Customer audits</li> </ul>
Employees and employee representative bodies (including unions)	<ul> <li>Intranet and published newsletters or notices</li> <li>Bi-annual presentations by the Chief Executive Officer to the executive community</li> <li>Presentations and written communication (e.g. newsletters and posters) on material issues and regulations affecting employees</li> <li>Conferences and general staff meetings</li> <li>Performance appraisals</li> <li>Union representative forums</li> <li>Workplace forums such as the employment equity and learning and development forums</li> <li>Industry relevant Sector Education and Training Authorities</li> <li>Independent anonymous reporting hotline</li> <li>Intranet-based incident reporting system</li> <li>Ad hoc events</li> </ul>
Suppliers	<ul> <li>Product conferences</li> <li>Visits and meetings</li> <li>Participation in manufacturing improvement projects and waste legislation compliance teams</li> <li>Supplier audits</li> <li>Senior operational and procurement staff day-to-day interactions</li> </ul>
Communities and non- profit organisations	<ul> <li>Corporate social investment programmes</li> <li>Workplace learning and development programmes for unemployed learners</li> <li>AVI graduate development programme</li> <li>Partnerships and sponsorships</li> <li>Ad hoc community engagements in surrounding communities, including Company-sponsored employee volunteer days</li> </ul>

Stakeholder type	Nature of the engagement
Business associations	<ul> <li>Participation in or membership of numerous associations such as the South African Chamber of Commerce and Industry; Accelerate Cape Town; the Consumer Goods Council of South Africa; a number of fishing industry associations including the South African Deep-Sea Trawling Industry Association; the Responsible Fisheries Alliance; the World Wildlife Fund's Southern African Sustainable Seafood Initiative; the Abalone Farmers' Association of South Africa; the South African Midwater Trawling Association; the South African Association for Food Science &amp; Technology; the Restaurant Association; the Speciality Coffee Association of South Africa; the Cosmetic, Toiletry &amp; Fragrance Association of South Africa; the Aerosol Manufacturers' Association; the Institute of Packaging SA; the South African Rooibos Council; and the Responsible Packaging Management Association initiatives</li> <li>Participation in association initiatives</li> </ul>
Government or regulators	<ul> <li>Regular contact with significant industry regulators directly or through business associations</li> <li>Participation in crisis management teams</li> </ul>

### **Ethics and Compliance**

The Company has a well-established and comprehensive Code of Conduct and Ethics ("the code") that applies to all directors and employees and provides clear guidance on what is considered to be acceptable conduct. The code requires all directors and employees to maintain the highest ethical standards and ensure that the Company's affairs are conducted in a manner which is beyond reproach. The code is communicated to all new employees as part of their induction training, is published on the intranet for access at all times by employees, and is published on the external Company website for public access (https://www.avi.co.za/code-of-conductethics/). The code is aligned with the recommendations in the King IV report and is regularly reviewed to ensure that it remains up to date and relevant.

In order to monitor ongoing compliance with the code, the Company has a formal governance framework. Within the governance framework, material issues are highlighted in management reports that are reviewed by the operating executives. If appropriate, matters are elevated to the Company's Board or Audit and Risk Committee. This formal framework is supported by the Company's internal audit function, which is responsible for investigating identified areas of concern and reporting its findings to the Company's Chief Financial Officer and the Audit and Risk Committee. The Company subscribes to an independent, professional hotline disclosure service as an important component of an ethical environment. This service facilitates confidential reporting on corrupt activities and other unethical conduct. Communication drives are undertaken from time to time to remind employees of this "whistleblowing" service. In addition, the Company has implemented an in-house intranet-based incident reporting service that requires employees to report incidents, or potential incidents, which have caused or could have caused harm to the Company's property, or people on the Company's premises.

A senior employee actively manages the incident management reporting system and also engages with the ethics hotline service providers. All anonymous reports and other reported incidents are reviewed on a daily basis, and, if appropriate, thoroughly investigated. The Company has a proven track record of dealing appropriately with matters arising from the ethics hotline and incident management reporting systems. Investigations and disciplinary hearings have been held and, where appropriate, civil and criminal action has been taken. Over the 12 months under review, 34 incidents were reported to the anonymous reporting hotline. At time of writing of this report, 18 of these complaints were closed as unfounded (after thorough investigation) and 16 have resulted in disciplinary action being taken. Breaches of applicable laws or relevant codes by suppliers may result in termination of the business relationship with them, and/or civil and criminal action being taken.

The Company is compliant with the provisions of the Protection of Personal Information Act, 4 of 2013, in that all appropriate policies, consents, and security safeguards for the lawful processing of personal information are in place. The Group Chief Executive Officer is appointed as the Information Officer and registered with the Information Regulator. The Company's manual in terms of the Promotion of Access to Information Act, 2 of 2000, and privacy policies can be found on the AVI and all other Group company websites.

In accordance with amendments made to the Financial Intelligence Centre Act, 2001 ("FIC Act"), in 2021, the Company has published its Group Risk Management and Compliance Programme ("RMCP"), which is applicable to all Group companies meeting the requirements to be "accountable institutions". Ultimate responsibility and accountability for compliance with the FIC Act rests with the Company's Board but responsibility and accountability for implementation of and compliance with the RMCP is delegated to the managing directors of the Group companies.

The Finance Shared Services division has been appointed as the necessary compliance function, with the head of Finance Shared Services being the person with sufficient competence and seniority to ensure the effectiveness of the compliance function. The FIC Act seeks to combat money laundering activities, terrorist financing activities, and proliferation financing activities, and to impose certain duties on institutions and other persons who might be used for such purposes. The Group companies have done the required risk assessments, implemented enhanced risk mitigation and customer due diligence processes, and complied with Directive 8 of 2023 in respect of screening of employees for competence and integrity and scrutinising of employee information against targeted financial sanctions lists as a money laundering, terrorist financing and proliferation financing control measure. All affected Group companies have also registered with the Financial Intelligence Centre and filed their annual risk and compliance reports in terms of Directive 7 of 2023.

In addition to the formal ethics framework, it is imperative to promote a culture that is consistent with the ethical values that the Company aspires to. This is achieved through the example set by the Board and executive management, consistent enforcement of these values, and the careful selection of employees that display the desired attributes and values. The Company continues to communicate formally with suppliers and customers to secure their support for and compliance with its ethical standards and has a published Group Supplier Code of Conduct, which code is compulsory for all suppliers of goods or services to the Group (https://www.avi.co.za/).

The Company's approach to tax is to always ensure that it remains compliant with applicable tax laws in the jurisdictions in which the Company and its subsidiaries operate, while ensuring that the Company sustains shareholder returns. The Company's integrity and reputation as a good corporate citizen remains important and is embodied in the Company's approach to corporate tax compliance. The Company has a Group tax function which is overseen by the Group Chief Financial Officer and provides support to underlying subsidiary tax functions, is responsible for various aspects of tax compliance across the Group, and ensures that the Company remains abreast of the changing tax landscape. When necessary, external experts are consulted to support the Company's internal capabilities and address areas of concern. Adherence to tax requirements, the current status of submissions, and outcomes from revenue authority audits, together with other pertinent tax matters, are reported to subsidiary internal review committees and, if required, are escalated to the Group Audit and Risk Committee. The external auditors also conduct annual independent audits of the Company and subsidiary compliance. The Group's effective tax rate for 2023 is 27,6% compared to 27,8% in the previous year, with the reduction primarily the result of implementing a lower statutory tax rate of 27%.

# Scarce resources, biodiversity and environmental Fishing resources

One of the Company's primary exposures to scarce resources that could materially impact its business is the sustainability of fishing resources (primarily deep water hake) in South African territorial waters.

1&J currently has long-term hake fishing rights at a level that can support economic returns provided that the resource remains at sustainable harvest levels.

I&J holds long-term fishing rights in the Hake Inshore Trawl, Patagonian Toothfish, and Horse Mackerel sectors, secured by means of the 2015 Fishing Rights Allocation Process and which remain in place until the end of 2031

I&J was also successful in securing 29,64% of the Hake Deep Sea Trawl Allowable Catch ("TAC") in the 2020/2021 Fishing Rights Allocation Process, representing a 4,3% reduction against the previously held rights. This, together with the Hake Inshore Trawl rights represents 25,8% of the total Hake TAC. I&J has appealed the outcome (particularly the fact that, despite being the highest scorer among its contemporaries, I&J still lost a percentage of its allocation, as well as the proposed increased apportionment to the Hake longline sector). The outcome of the appeals is, at this stage, expected by the end of September 2023.

Furthermore, I&J's Umsobomvu joint venture retained all but one of its rights in the Squid sector, while I&J was not awarded a right. Both Umsobomvu (in its own name) and I&J have lodged appeals, but the outcome of the appeals (published on 12 June 2023) reinforced the decision and reduced the allocation of all rights holders in this sector by a further 10% in order to accommodate new entrants into the sector. I&J is considering launching a review application in the High Court to challenge this outcome, which application would have to be made by no later than 10 December 2023.

The health of the South African fishing resource is managed by the Department of Forestry, Fisheries and the Environment ("DFFE"). The DFFE sets an industry-wide annual TAC for each species under management, and for certain species, also sets a "total allowable effort" in which a limit is placed on the number of boats, number of men, and the number of days per year that each boat is licensed to fish. In addition to the TAC, hake trawling sector effort limitations apply which seek to ensure that the capacity of the deep-sea trawling fleet does not grow too big for the available resources.

The TAC level is managed conservatively based on scientific modelling of catch data recorded by fishing companies and annual resource survey voyages conducted by the DFFE using either their own or chartered vessels. The graph on the following page shows the I&J quota (representing a portion of the TAC) over an extended period, with movements tracking the performance of the hake resource over time. After a period of several years of decreases in

quota in line with resource performance, the TAC was increased by 10% in 2019, reflecting an expectation of an improvement in resource performance after a period of strong recruitment. The TAC was left unchanged in 2020 but was reduced by 5% in both 2021 and 2022. Owing to good recruitment and subsequent favourable industry surveys, which indicated stability in the resource biomass, DFFE increased the TAC by 5% in 2023.

In the past few years I&J has caught an increased proportion of smaller fish, negatively impacting freezer catch rates and land-based processing owing to an increase in the number of fish to be processed for an equivalent volume. This has been experienced previously and is part of the natural biomass cycle, which is influenced by various environmental factors. Although this proliferation of small fish negatively impacts performance in the short term, it is indicative of strong recruitment. This has been evidenced by an increase in larger fish more recently as these small fish mature.

The strong recruitment is, in part, the reason for the increase in TAC. However, weather and oceanic conditions are intricately connected to fish availability and catch rates. Over the past two years more and more extreme weather records have been broken globally. Off the coast of South Africa there has not been a significant increase in storm frequency, but there has been an increase in intensity recorded, with increases in wave height and wind speeds. Although this change is not necessarily negative for resource biomass, it does negatively affect the fishing operations.

I&J strives to lead initiatives to manage fishing efforts and protect breeding areas off the South African coast to ensure a sustainable resource for future generations. Notable accreditations and initiatives are set out below:

 Certification by the Marine Stewardship Council ("MSC") since 2004: The MSC is a global organisation that works with fisheries, seafood

- companies, scientists, conservation groups, and the public to promote sustainable fishing. Its fishery certification programme recognises and rewards sustainable fishing. In 2021 the South African hake fishery was recertified for the fourth time, based on the latest certification standard released by the MSC, providing assurance to buyers and consumers that the fishery is well managed and sustainable, which is increasingly relevant to I&J's customers and consumers.
- Responsible Fisheries Alliance ("RFA"): In 2009 I&J joined the global conservation organisations WWF, BirdLife South Africa, and other local fishing companies to form the Responsible Fisheries Alliance. The objective of the RFA is to ensure that all stakeholders understand and support the implementation of an Ecosystem Approach to Fisheries ("EAF") management in South Africa's fisheries. EAF seeks to protect and enhance the health of marine ecosystems. The goals of the RFA include promoting responsible fisheries' practices, influencing policy on fisheries' governance, and supporting skills development and research in the industry.
- OMP and TAC: The South African Hake Trawl Fishery was one of the first in the world to implement Operational Management Practice ("OMP") for hake, which sets TAC and determines how it is calculated using scientific methods and data. This is achieved and enforced through partnering with the DFFE, which appoints a number of scientific working groups to formulate research advice.
- Ring Fence Initiative: In 2006 I&J and other members of the South African Deep-Sea Trawling Industry Association agreed to ring-fence areas in order to protect the seabed and preserve our natural resources by creating a natural refuge for hake and other fish species.
- Responsible By-Catch Management: During I&J's fishing operations there will be incidents where species with sustainability concerns are caught as unavoidable by-catch. I&J cannot completely avoid

#### I&J TAC 2003 to 2023



or exclude these species from its fishing operations but is committed to ensuring that these species are included in an effective By-Catch Management Plan and best practice solutions are proactively implemented to manage and mitigate the impact on these vulnerable species.

 Certification by the Aquaculture Stewardship Council: I&J's Aquaculture Division achieved recertification of the Farmed Abalone operation in 2022

#### Water

Water is, and always will be, a scarce resource throughout South Africa. Potential shortages, interruption of municipal supply, and quality of water have been identified as risks at many of the Company's facilities. The subsidiary companies have invested substantial time and money to mitigate these risks, which include using borehole water, installing water reservoirs, recycling condensate and effluent, installing a desalination processing plant at I&J, and taking action to measure and better manage water consumption.

I&J in particular is highly dependent on potable water to produce ice for fishing operations as well as for the processing of fish and the cleaning of both the Woodstock Primary Processing and the Paarden Island Value Added Processing facilities. I&J has implemented a number of water-saving initiatives, resulting in a reduction in usage of municipal water of approximately 80% since F16. In 2017/2018 and in view of the drought in the Western Cape and the risk of significant water supply restrictions in Cape Town, I&J engaged with both government and water specialists to assist in investigating alternatives with a view to securing a supply of water sufficient to maintain operations into the future. To this end, a substantial investment in producing potable water from non-potable ground water and a desalination process have been installed, both of which have assisted substantially in the reduction of I&J's dependence on municipal water.

Indigo Brands maintained its water-saving initiatives previously implemented, including water metering and monitoring, and a water-wise garden, and is in the process of installing a chlorine dosing system in the potable water reticulation system after tests showed a lack of chlorine in the municipal water supply. Indigo Brands will rely on potable water transported from the I&J water purification plant in the event of municipal supply interruptions.

The installation of a Borehole Treatment Plant at the Rosslyn Snacks factory is planned to take place in F24. Provision has been made for new, larger water storage tanks adequately sized for the site's water requirements (expected to meet more than 82% of the site's process water requirements). Water pumped from boreholes will be treated through cartridge filtration, reverse osmosis, and disinfection to meet SANS 241-1:2015 drinking water specifications and the same equipment will also have the ability to treat any out-of-specification municipal water. Additional water tanks were approved for the Isando Biscuit factory, with construction being done in F23. This is planned

to increase process water storage on site so that production can continue unhindered for more than 11 days should the municipal supply fail.

Owing to the generally deteriorating quality of municipal water, National Brands has embarked on a Water Quality Project and water specialist consultants are being engaged to ensure the sites remain capable of dealing with changing water quality. The immediate priority is disinfection of the water owing to low incoming free chlorine levels. This project is being run on an urgent basis to ensure that solutions are in place early in F24. The technology to be employed will consider the different water requirements of the various sites in respect of volume requirements and water usage, and it will ensure compliance to SANS 241-1:2015 drinking water specification.

The Isando area had a number of water outages in the second half of F23, mainly impacting the Isando Coffee and Creamer factory despite the site having three days' back-up water. National Brands had installed process water back-up tanks at its sites over recent years but owing to the further deterioration in water supply security as a result of municipal infrastructure failure, it is further increasing the back-up storage at some sites and investigating the feasibility of borehole water for the Isando Coffee and Creamer and Isando Biscuit factories.

#### **Electricity**

The extreme energy shortages experienced in South Africa highlight the need for the Company to be more self-sufficient and to make energy conservation a priority. Numerous energy-saving initiatives have been implemented by the subsidiary companies to manage energy usage and, at the same time, generators have been installed at most of the Company's facilities to ensure continuity of supply. The generator installations across the Group ran for a total of 10 898 hours in 2023, a significant increase from the 2 612 hours in 2022. This included the need for the I&J Abalone Culture Division to run its generators for 70 hours non-stop following a severe storm with gale force winds that resulted in four Eskom electricity poles being blown over and a total power outage of the Overstrand area. The generators help to sustain production throughput and customer service levels despite increasingly unpredictable supply and repeated load-shedding, albeit at an increased cost and increased diesel usage.

Details of specific energy-related projects implemented and planned throughout the Group are included later in this report under the section on environmental practices.

#### **Biodiversity**

South African biodiversity includes a wide variety of natural resources. Despite its relatively small land surface area, South Africa is home to 10% of the world's plant species, many of which are endangered and vulnerable. The loss and degradation of South Africa's biodiversity has serious implications for society and the economy. Large portions of the country's economy are dependent on biodiversity, including the fishing industry and agriculture based on indigenous species.

I&J's Danger Point abalone farm is situated immediately adjacent to the sea and is the Company's only property in or adjacent to an area of high biodiversity. South Africa's high energy coastline is generally unsuitable for offshore fish farming and land-based aquaculture allows for better control over environmental factors so that the impact on the environment can be limited. Although abalone aquaculture has a relatively low impact on the environment, in order to minimise any potential harm, the global abalone farming industry, including I&J, has, together with the WWF, developed a set of standards. The Danger Point abalone farm has adopted the Global Abalone Standards and has been audited by the Aquaculture Stewardship Council ("ASC"). Accreditation was granted in November 2015 and renewed in 2019 and 2022. This eco-label is used to quarantee that I&J's abalone products are and continue to be raised in an environmentally responsible manner. The abalone processing plant located on the Danger Point abalone farm complies with all ASC, DFFE, FDA, and National Regulator Compulsory Specifications and standards.

The Rooibos plant Aspalathus linearis is part of the Cape Floral Kingdom, commonly known as "fynbos". Rooibos is indigenous to the Cederberg Mountains around Clanwilliam. At the turn of the 19th century it was common practice for the inhabitants of the Cederberg region to harvest the wild-growing Rooibos plants. The leaves and fine stems were chopped, fermented, and dried to be used in a variety of ways. In 1904 a Russian immigrant and descendant of generations of tea traders, introduced Rooibos to the wider world. By 1930 a local medical doctor and botanist had discovered the secret of germinating Rooibos seeds and, together with a local farmer, developed new cultivation methods on a larger scale along the slopes of the Cederberg Mountains. This is still the only place in the world where Rooibos is grown and the European Commission has approved the registration of the designation "Rooibos/Red Bush" in its register of protected designations of origin and protected geographical indications. Rooibos is the first African food to receive the status of a protected designation of origin in the EU register. It is hoped that this registration will assist in sustaining the Rooibos industry and that higher consumption flowing from increased recognition will contribute to the preservation of traditional knowledge and further uplift small-scale farmers in the indigenous communities producing Rooibos.

The commercial farming and production of Rooibos has resulted in the establishment of a worldwide distribution network and medical science is starting to discover the many health benefits of Rooibos. In 2010 the South African San Council ("SASC") approached the DFFE requesting negotiations with the Rooibos industry in accordance with the National Environmental Management (Biodiversity) Act of 2004 ("NEMBA").

In 2012, they were joined by the National Khoi & San Council ("NKSC") in seeking recognition as joint traditional knowledge rights' holders. Under the facilitation of the DFFE, these two parties met with the South African Rooibos Council for the first time in 2012

to start the process of negotiating an Access and Benefit-Sharing ("ABS") agreement for Rooibos. One of the fundamental principles of an ABS agreement is the fair and equitable sharing of the benefits arising from the commercial utilisation of indigenous biological resources.

After a long process of negotiations, a historic, industry-wide, ABS agreement was signed in 2019 between the SASC, the NKSC, and the South African Rooibos industry. The ABS agreement seeks to balance the interests of the indigenous communities and the sustainability of the industry and forms the basis on which these communities will access a percentage contribution from the sale of Rooibos. The ABS agreement ensures the Rooibos industry's compliance with South Africa's bioprospecting laws and regulations. The benefits generated are paid to the communities through two community trusts. These trusts are overseen by trustees selected from within the traditional communities and the local farming communities. Additional members may include independent legal advisors and representatives of the DFFE, the Department of Cooperative Governance and Traditional Affairs, and the Department of Science and Technology. The trusts are under the oversight of the Master of the High Court.

In July 2022, the first round of benefit-sharing funds for 2019 volumes in the amount of R12,2 million was distributed to the National Khoi and San Council and the South African San Council as part of the ABS agreement. A further payment of R11,1 million for the 2020 and 2021 volumes was paid at the end of February 2023. The 2022 volumes are still being finalised for calculation of the levies payable.

On a global scale, natural forests are among the most biodiverse habitats and are home to many people who derive their livelihoods from forest biodiversity.

Large-scale industrial logging and monoculture plantations cause damage to natural forests. Protecting these and other biodiverse habitats must be a priority for all industries and the Company is committed to addressing the issue of corporate deforestation through the development and implementation of environmentally friendly, responsible, and sustainable procurement programmes. Details of such procurement programmes are set out in the environmental practices section below.

#### **Environmental policy**

The Company recognises that its use of natural resources has a socio-economic and physical impact on the environment, accepts responsibility for such impacts, and pursues responsible environmental and climate change practices. This involves:

- Reducing the Company's environmental impact and continually improving the Company's environmental performance as an integral part of the Company's business strategy and operating methods;
- Compliance with applicable environmental legislation and relevant standards;
- Responsible environmental management of inputs (material, energy, and water) and outputs (emissions, effluents, and waste);

- Independent annual environmental audits at each manufacturing site that measure the impact the particular operation has on the environment and that review compliance with legislation and Company policy;
- Providing a framework for setting and reviewing objectives and targets;
- Ensuring that all employees understand the environmental policy and conform to the standards it requires; and
- Reporting in the Company's annual report on performance against targets.

The Company's Board is responsible for the environmental policy and for ensuring that its principles are considered in formulating the Company's business plans. The Company's Chief Executive Officer and senior management are in turn responsible for the implementation of the business plans and communication of the policy. The Board has delegated the responsibility for monitoring compliance with the policy to the Company's Audit and Risk Committee, with responsibility for monitoring the Company's environmental activities and the impact thereof delegated to the Social and Ethics Committee.

The Company remains committed to responsible management of applicable environmental matters,

including those which impact on climate change and relate to responsible and sustainable environmental practices, such as greenhouse gas emissions; raw materials usage and recycling; resource usage and efficiency (including water and electricity); impacts on biodiversity; and emissions, effluents and waste management. In particular, the Company is aware that climate change will impact on natural resources and legislative changes that will affect the way the Company does business. The Company monitors relevant global and local legislation, regulations, and emission-reduction targets.

The Carbon Tax Act, 15 of 2019 came into effect on 1 June 2019. Carbon Tax is aimed at reducing greenhouse gas ("GHG") emissions in a sustainable, cost-effective, and affordable manner and gives effect to the polluter-pays-principle. The Company has licensed each of its affected facilities for environmental levy purposes and the relevant emissions are measured. Carbon Tax paid since implementation is reflected in the environmental data table below.

#### Environmental data

Since 2012 the Company has been measuring, managing and reporting on certain identified environmental impact areas and a comparison of the measurements for the last five years is set out below:

			Carbon			Data		
	Indicator	Unit	(kg)	F23	F22	F21	F20	F19
1	Total water consumption by source	_						
1.1	Municipal	Litres	197 837	663 883 541	663 565 098	589 855 793	500 806 371	530 332 908
1.2	Ground water (borehole)	Litres	58 599	196 640 000	209 967 000	128 601 729	125 811 000	123 284 000
1.3	Desalinated	Litres	87 121	24 541 000	20 943 500	24 885 000	25 783 351	20 176 000
2	Total energy consumption –							
2.1	Purchased electricity*	kWh	86 369 093	83 853 489	95 391 743	101 639 745	102 393 633	105 411 043
2.2	Coal	Tonnes	40 767 966	14 271	14 668	14 532	14 444	14 384
2.3	Petrol	Litres	1 911 568	682 703	539 099	594 599	674 732	786 396
2.4	Diesel	Litres	64 430 897	21 735 034	21 657 784	20 093 935	12 363 446	8 214 665
2.5	Liquified petroleum gas (LPG)	Litres	2 046 390	2 101 519	2 063 795	2 017 449	1 927 767	1 885 807
2.6	Natural gas	Cubic metres	7 651	2 802 749	2 835 133	2 931 147	3 107 232	3 049 839
2.7	Heavy marine fuel/Jet fuel	Litres	1 541 445	513 815	502 912	856 046	7 742 419	12 097 912
2.8	Paraffin	Litres	3 458 798	343 832	411 389	518 920	570 662	610 803
3	Carbon emissions for above indicat	ors	200 877 364					
3.1	Total carbon emissions	Metric tonnes	200 877	200 877	213 866	217 512	216 416	220 767
3.2	Carbon emissions per employee	Metric tonnes		22,82	25	25	25	26
3.3	Carbon tax paid	Rand		2 419 539	2 205 702	2 356 272	Not applicable	Not applicable

 $<sup>^{\</sup>star}$  F22 purchased electricity restated from 104 403 575 as the reported figures reflected a Spitz capturing error.

In addition to the key areas referred to above, the Company considers, on an ongoing basis, further areas of environmental impact for possible measurement and reporting, as well as new initiatives to mitigate environmental impacts of products and services, where relevant.

#### **Environmental practices**

During the year, the subsidiary companies continued their measurement and mitigation of detrimental environmental impacts. Some of the Company's activities and achievements include:

- Environmental management systems All five of the National Brands' factories have both ISO 14001 Environmental Management System and ISO 45001 Occupational Health and Safety Management System accreditation and performed well in F23 in retaining certification and showing improvement. The ISO 14001 quality management system enables the factories to identify and control the environmental impact of their activities; continually improve their environmental performance; and implement a systematic approach to setting environmental objectives and targets, achieving these, and demonstrating that they have been achieved. I&J has the MSC's Chain of Custody Certification for sustainability in the fishing industry and the Aquaculture Stewardship Council Certification for sustainable abalone farming.
- Energy conservation The energy shortage, and global efforts to reduce greenhouse gas emissions, make conserving energy a priority for the Company. Projects in past years include: improving the efficiencies of production machinery, equipment and processes; installation of energy-efficient, lower power consumption, LED lighting solutions; installation of electricity meters for the measurement of electricity consumption and consumption patterns; Demand Site Management Surveys by Eskom to enable the formulation of improvement plans; electrical load shifting where possible; installation of photovoltaic arrays; louvres to passively control heat gain; installation of energy efficient compressors at I&J Woodstock; an upgrade of the power factor correction to optimise energy demand at the Indigo Brands factory; the use of timers to reduce unnecessary running time of air-conditioning units; motion detection for lights where feasible; and upgrading of the air compressors to include variable speed drive and heat recovery functionality in order to provide warm water for ancillary processes. National Brands, in particular, is formally defining its Energy Strategy, with specific initiatives at each site. Energy audits were done and actions plans to reduce energy usage were formulated and are being executed. There will be investment in F24 in energy measurement systems to determine real-time usage associated with different processes, inform energy usage reduction plans, and track progress. The Energy Strategy will also consider best technology for future energy needs, and determine opportunities for greener energy where possible.

Some F23 energy initiatives included:

Installation of a more energy efficient air

- conditioning system in the packing hall at the Westmead Biscuit factory;
- Further expansion of ongoing LED lighting initiatives to include the Isando, Redhill, and Spitz Isando distribution centres, with a view to reducing energy consumption by 1 151 MWh per annum, while still complying with the prescribed Occupational Health and Safety lux levels;
- The replacement of fluorescent lights with LED lights in the Indigo Brands aerosol store;
- The replacement of lead-acid material handling equipment batteries with more efficient lithiumion batteries:
- The upgrade of all major hot water piping reticulation and cleaning of the main water reticulation pipes at the I&J Aquaculture Danger Point farm to ensure maximum flow efficiency and to stop mussel growth limiting flow;
- At the I&J Woodstock factory: the installation of Variable Frequency Drives on compressor motors; the installation of "omni-panel" compressor controllers to better manage compressor usage; staggered defrost cycles across cold rooms to stabilise the load on the refrigeration plant; and other modifications in the refrigeration system to improve efficiency;
- The commissioning of power quality and electrical equipment assessments across all five National Brands' manufacturing sites. Reports identified varying severities of power dips, spikes, and harmonics at all sites, with notable impacts at the Westmead Biscuit and Rosslyn Snacks factories. In F24 investigations will look further into these issues and a comprehensive plan will be developed to address the findings. In the meantime, the server room UPS back-up power at all five National Brands' factories was upgraded to an improved industrial back-up power solution, consisting of surge protection, industrial inverters, and lithium-ion batteries; and
  - The installation of a photovoltaic energy system at the Group head office in Illovo, Johannesburg.

#### Plans for F24 include:

- Replacement of old and inefficient air compressors at the Durban Tea factory with energy efficient units housed in a purpose-built compressor room, which is expected to be completed during the first half of F24;
- Installation of a boiler feed water preheat system at the Isando Coffee and Creamer factory, utilising heat from return condensate, which will reduce coal consumption and emissions; and
- An investigation into the expansion of the photovoltaic energy system at the Bryanston campus in Johannesburg to reduce reliance on municipal and generator power requirements.
- Water conservation Poor water quality and shortages remain significant potential risks to the Company and the subsidiaries take steps to minimise these risks. These steps include using borehole water where appropriate, reservoirs for storing water, recycling condensate produced during the heating processes back to the boilers, recycling production effluent with a view to reclaiming waste water, installing a desalination

processing plant at I&J, and adopting environmentally friendly storm water reticulation, while simultaneously taking measures to measure and manage water consumption. Towards the end of F22 a water measurement and monitoring system was installed at the Rosslyn Snacks factory, which provides visibility of water use in the various processes and enables the site to identify opportunities for the reduction of water usage. The site has made progress with utilising more waterefficient cleaning methods, such as scrubbers, high-pressure washers, and pressure nozzles, to reduce water usage. A replacement potato chips fryer was procured for the Rosslyn Snacks factory during F23, with installation and commissioning planned for mid-F24. This will include a water reticulation facility to reduce consumption by approximately 10%. With this, and the planned borehole facility in place, the Rosslyn Snacks factory will reduce dependency on the municipal water supply. The Westmead Biscuit factory has introduced new water-efficient spray nozzles in some production areas, which is reducing water usage. A new condensate return pump has been installed at the Isando Coffee and Creamer factory, which will increase the quantity of condensate return, which supplements boiler feed water and, in so doing, reduces the amount of municipal water that is required.

- Fuel consumption Within the distribution operations there is ongoing focus on optimisation of delivery routes and distribution networks through utilisation of routing and scheduling software, the deployment of on-board technology, advanced fuel management systems, more efficient engines and matching of loads to vehicles, the conversion of diesel forklift fleets to electric (which reduces both fuel consumption and harmful emissions), as well as driver training academies, which are all key issues in reducing fuel consumption and the Company's carbon footprint. During F23 the distribution centres outsourced part of their finished goods shuttling operation to contracted specialist performance-based standards vehicles. These vehicles have a 16% increase in carrying capacity, which will result in an estimated annual distance reduction of 65 340 kilometres and 109 tonnes of carbon emissions. I&J has been able to improve the fuel efficiency of its fishing fleet by between 3% and 5% through a number of initiatives, including the modernisation of fishing gear and sensors used, governance of speed when steaming to and from fishing grounds, increased monitoring of fuel usage, and regular engagement with skippers regarding fuel efficiency. The forklift truck fleet at the Durban Tea factory, previously powered by LPG, was replaced with electric lithium-ion battery-powered units in F23. This has significantly reduced the usage of LPG. Unfortunately, across most sites there was a significant increase in diesel usage to run back-up generators during times of load-shedding.
- Emissions, effluents and waste The Company is committed to a waste management strategy, reducing the use of raw materials, reducing waste, reusing waste wherever possible, and recycling

- waste that cannot be eliminated or reused. Key to managing waste is the monitoring and analysis of waste volumes and component parts to provide the information needed to manage waste effectively. The Company recognises its responsibility in terms of the Air Quality Act, 2004, is committed to efficient and effective air quality management, and ensures that all ovens, boilers, and boiler stacks are correctly operated, well maintained and routinely inspected. In addition, the factories engage with approved inspection authorities and conduct air emission surveys. Some of the material initiatives over the years have been as follows:
- The International Maritime Organisation 2020 legislation required a significant reduction in sulphur emissions from maritime vessels from January 2020. I&J was able to comply with the requirements of the new standards within the timelines allowed by the South African Maritime Safety Authority.
- Effluent plant management has been outsourced to specialists at the Isando and Westmead Biscuit factories, and the Isando Coffee and Creamer factory. During the year the effluent treatment plant at the Rosslyn Snacks factory was upgraded in order to provide for future effluent quality compliance if more stringent municipal limits are implemented. At the distribution centres all vehicles are washed using biodegradable chemicals and grease traps are cleaned regularly to prevent contamination of the main sewer system. In general, waste materials are classified for possible reuse, recycling or disposal, and disposals are done through registered waste disposal and recycling companies.
- 1&J routinely recycles metal, corrugated cartons, used sunflower oil and used marine oil.
- National Brands reduced packaging waste by right-gauging flexible packaging and removing excess packaging. The business also encourages consumers to recycle and makes them aware of the recycling categorisation of the packaging.
- The phasing out of lead acid batteries and replacement with new generation lithium-ion batteries, which carry no risk of acid spills, corrosion, hazardous gas emissions, or any sort of contamination. In addition, lithium-ion batteries are 30% more energy efficient than lead acid batteries and virtually maintenance free.
- Waste to landfill A new waste management service provider was appointed in F21. This supplier created and fostered many alternative waste disposal streams, reducing waste to landfill. Some of the major initiatives include:
  - On-site sorting of boxes and diversion to recycling rather than landfill;
  - Spent coffee ground collection for recycling;
  - Improved waste segregation at sites resulting in less loads being sent to landfill;
  - The final implementation of the project for the use of shredded BOPP (Biaxially Oriented Polypropylene) packaging in brick-making;
  - Biscuit, biscuit fillings, jams, icings, and syrup being diverted from landfill to animal feed; and
  - Enhanced staff training on waste segregation to

reduce recyclables being placed in general waste for landfill.

- Raw materials (excluding packaging) -
  - The Company is a member of and has representation on the Board of the South African Rooibos Council, a non-profit organisation whose goal is to protect the Rooibos Industry and to ensure the sustainability of this raw material.
  - All yellow maize procured for the manufacture of liquid glucose is certified as non-genetically modified.
  - Ciro sells a range of Fairtrade, Organic, Rain Forest Alliance and UTZ (an international standard for sustainable farming of coffee, cocoa, and tea) certified products. A partnership with Mbokomu Rural Cooperative Society in Tanzania assists farmers and farming communities to improve the quality of their coffee and improve processing to reduce waste.
- Palm oil is a vegetable oil from the fruit of oil palm trees and is more solid than liquid at room temperature. This makes it ideal for cooking and it is an ingredient in many foods and beauty products. Palm oil has developed a poor reputation as a raw material owing to slash-andburn deforestation. A balance needs to be found between the demand for palm oil, the economic benefits of the product, and protecting forests, wildlife, and local communities. Therefore, the use of palm oil from ethical and sustainable sources as certified by bodies such as the Roundtable on Sustainable Palm Oil ("RSPO") is an integral part of the Company's environmental and sustainability policies and strategy. The RSPO is a not-for-profit association that works with stakeholders across the palm oil supply chain to make sustainable palm oil the norm. Members include plantations, processors and traders, consumer goods manufacturers and retailers, financial institutions, and non-governmental organisations. The RSPO has developed a set of environmental and social criteria which companies must meet in order to produce certified sustainable palm oil. When they are properly applied these criteria help to minimise the negative impact of palm oil cultivation on the environment, wildlife, and communities in palm oil-producing regions. According to the RSPO "although using other vegetable oils seems like a practical solution, it would actually create similar – if not even larger – environmental and social problems. Therefore, the best solution is to ensure you buy products that contain sustainable palm oil". To this end all the palm oil procured by the Company is from RSPO certified suppliers.
- The National Brands' factories are replacing current barcode and date code printing solutions with a new technology that eliminates the need for paper labels and glue. This also reduces the environmental exposure to Volatile Organic Compounds to just 1/10th of current systems and uses up to 80% less energy.
- Packaging
  - National Environmental Management: Waste Act, 2008 ("Waste Act") –

As required by the Act and corresponding regulations, the Company's trading subsidiaries have registered with the DFFE and have joined relevant Producer Responsibility Organisations ("PROs"), through which they will report on paper and packaging usage and pay the required levies, which will be used to improve collection and recycling rates of packaging material put into the market. The PROs in turn report to the DFFE. They also have the responsibility of managing the various Extended Producer Responsibility ("EPR") measures required to be implemented.

EPR requires manufacturers, users, and importers of affected products ("producers") to bear a degree of responsibility for these products and ensure that the products are either recycled or up-cycled, and that waste products diverted to landfill are kept to a minimum. The Company has also played a leading role in ensuring that the various participants in the packaging value chain are making a tangible contribution to environmental sustainability, while minimising the financial hardship to the end-consumer in an already challenging economic environment. To this end, the Company has engaged extensively, and continues to do so, with the DFFE, the Consumer Goods Council of South Africa, various PROs, various environment NPOs, recyclers of packaging waste, waste management companies, and raw material suppliers, such as the paper mills.

The Group companies ensure that they comply with relevant legislation through registration with appropriate PROs and submission of material usage declarations to enable the calculation and payment of EPR levies. For the period to the end of June 2023, based on declared volumes, the levies amount to R2,5 million.

- In June 2023, the Department of Forestry, Fisheries and the Environment published the Packaging Guideline: Recyclability by Design for Packaging and Paper in South Africa, under section 6(1)(a) of the National Environmental Management Waste Act, 2008. The Packaging Guideline covers four categories of packaging material streams, namely metals, glass, paper, and plastics and is intended to reduce the volume of packaging going to landfill sites by improving product design, increasing quality of production practices, and promoting waste prevention. One of the key objectives of the Packaging Guideline is to assist designers in all forms of packaging to gain a better understanding of the environmental implications of their design decisions, thus promoting good environmental practices without restricting choice. The Packaging Guideline will be used by the Group's marketing and procurement teams to provide guidance and direction on how to make responsible and sustainable packaging choices.
- The Sustainable Forestry Initiative ("SFI") and the Forestry Stewardship Council ("FSC") are the two most recognisable and legitimate certifications in paper packaging, with FSC being the most

demanding. Both the SFI and FSC certify forest management programmes according to their set principles and criteria, including sustainable harvest levels, conservation of biodiversity and old growth, protection of endangered species, protection of water quality, recognition of the rights of indigenous people, prompt reforestation, forest conversion, plantations, clear-cutting, chemical use, and genetically modified trees. The Company has implemented required FSC certification on all paper packaging. FSC has three product labels, namely FSC 100%, FSC Recycled, and FSC Mix. FSC 100% is wood that comes entirely from FSC-certified, wellmanaged forests; FSC Recycled is wood or paper that comes from reclaimed or reused material; and FSC Mix is wood that is from FSC-certified forests, recycled wood, or controlled wood. While not FSC-certified, controlled wood cannot be: (a) illegally harvested; (b) harvested in violation of traditional and civil rights; (c) harvested in forests where high conservation values are threatened; (d) harvested in forests being converted to plantations or non-forest use; or (e) harvested in forests where genetically modified trees are planted. As reflected in the table below, nearly 100% of the Company's paperboard spend is with FSC-certified suppliers, with the remaining 5 tonnes under review. In addition, all paperboard materials can be recycled multiple times.

 "Design 4 Recyclability" is a packaging development enabler to drive greater levels of both circular economy supportive solutions and as a continuing effort to reduce existing problematic materials. Following the successful development of components with locally available post-consumer recycled polypropylene, Indigo Brands continues increasing its usage across aerosol and roll-on caps. The driver to support greater levels of circular economy continues with ongoing development in alternative colours, as well as other potential formats.

- During the course of F23 the Company measured its use of various categories of packaging materials. Paper and board products were categorised according to the FSC categories. Plastics were categorised as follows:
  - Recyclable: plastics that are currently recyclable, e.g. single-layer films and most clear, unprinted films;
  - Potentially recyclable: plastics such as multimaterial laminates that require specialised facilities/infrastructure and supply chains for recycling;
  - Compostable: plastics that need to be managed separately in the waste stream, e.g. bio-polymers, and corn-starch based plastics; and
  - Non-recyclable: all other non-sustainable plastics such as PVC and polystyrene.
- The following tables reflect the annual tonnages of cartons, corrugates and plastics used by the Company in the categories described above, and the percentage of these materials against the total of such materials used:

	Carto	ons	Corruç	rrugates Filter paper		aper	Total	
	Annual tonnage	% of annual	Annual tonnage	% of annual	Annual tonnage	% of annual	Annual tonnage	% of total
FSC 100%	3 536	45	_	_	_	_	3 536	17
FSC mix/recycled	4 357	55	12 615	100	765	100	17 737	83
Non-FSC/non- compliant	5	_	_	_	_	_	5	_
Total	7 898		12 615		765		21 278	
% of total tonnage of all paper packaging (%)	37		59		4		100	

		Material component							
	Contains recycle	ed material	Contains recycled ma		Total				
Plastics	Annual tonnage	% of annual	Annual tonnage	% of annual	Annual tonnage	% of total			
Recyclable	256	98	1 455	22,0	1 711	25,0			
Potentially recyclable	6	2	5 092	78,0	5 099	75,0			
Compostable/ biodegradable Non-recyclable	-	_	_	_	-	_			
Total	262		6 547		6 810				
Percentage of total tonnage all plastics (%)	4		96		100				

- The use of non-FSC fibres in paper packaging was further reduced from F22, despite the myriad of supply challenges in sourcing board, in line with the goal to be 100% based on FSC or similarly approved fibre.
- There has been continued progress in the light-weighting of plastic packaging in both rigid and film packaging which means that less packaging is put into the market for the same amount of product.
- The Company continues to explore sustainable alternatives to conventional plastics while balancing the risks of additional costs to the consumer and supply availability due to the relatively small amount of sustainable sources available globally.
- Footwear and Clothing Footwear and clothing sustainability has become an area of increasing importance for the Company. This requires a comprehensive review of all processes, including design, development, manufacturing, distribution, and selling, with a view to identifying and managing relevant areas to minimise negative environmental impacts, conserve energy and natural resources, and ensure the safety of persons involved in these processes, the communities in which they live and work, and consumers, while at the same time ensuring that such practices are economically sound.

The tanneries in Italy from which Spitz's footwear manufacturers derive their leather, carry the prestigious Leather Working Group ("LWG") silver certification as proof of their commitment to good manufacturing and the environment. The LWG audit standard assesses the impact of leather production and, as an organisation, the LWG aims to have a positive impact on the environment and communities, through driving:

- Increased supply chain traceability and transparency
- Increased knowledge and access to data
- Improved resource efficiency in leather production
- Reduced waste generation and emissions to the environment
- Improved chemical management and increased use of non-hazardous chemicals
- Increased deforestation and animal welfare due diligence
- Improved working conditions and fair treatment of workers

Spitz's footwear manufacturers and other suppliers in the European Union are regularly subject to audits encompassing labour standards, health and safety, environment, and business ethics, from organisations such as SMETA (Sedex Members Ethical Trade Audit), which is the most widely used format for social audits in the world, enabling businesses to assess their sites and suppliers to understand working conditions in their supply chain. Suppliers are required to be able to show compliance with industry standards as well as their own social responsibility and environmental policies. Spitz strives to work with suppliers who

want to contribute to the well-being of their communities and environments.

For those products and/or components manufactured or supplied outside the European Union, Spitz closely monitors industry compliance and risk assessments and initiatives, including the Amfori Business Social Compliance Initiative ("BSCI"), which is an industry-driven movement that aims to monitor and assess workplace standards across the global supply chain, and the Foreign Trade Association. Factory production in China and other Asian countries plays a major role in the global footwear industry and it is a priority for Spitz to remain informed on potential trade and sustainability issues (including social and environmental issues) in these countries, and to assess the risks of doing business with these suppliers while also meeting stakeholder expectations.

Spitz measures the environmental impact areas set out in the table earlier in this report, and has registered with the Fibre Circle Producer Responsibility Organisation in accordance with the Waste Act.

#### Contraventions

During F23 I&J received a R225 000.00 environmental contravention fine from the South African Maritime Safety Authority for an accidental oil spill onto deck and overboard on the MFV Avro Warrior. Watchkeepers noticed oil in the save-all and indicated to the team to stop pumping. Unfortunately, owing to a slight roll of the vessel, some oil went overboard before the oil in the save-all could be recovered. Other environmental incidents at I&J for which no notices, fines, or non-monetary sanctions were imposed were:

- Two minor ammonia leaks at Cape Town Processing, the first caused by a plate freezer operator mistakenly opening a liquid pressure valve, and the second caused by constant pressure increases and decreases on the liquid pressure valve during load-shedding;
- Two spills of cooking oil at Value Added Processing of 15 litres and 200 litres respectively, caused during the pumping by an outsourced contractor of used cooking oil into 1 000 litre containers; and
- A minor ammonia leak at Auckland Cold Storage caused by the failure of the air conditioning system motor.

The Westmead Biscuits factory received an effluent non-compliance notice owing to a pH sample taken by the municipality not meeting specification. This was due to a pump failure, which was corrected. No fine was issued

Other than the notices and fines referred to above, no other fines or non-monetary sanctions for infringement of or non-compliance with environmental laws and regulations were recorded and/or levied against the Company, directors, officers, or employees during the period under review and the Company experienced no major environmental incidents. No formal requests or directives have been

issued by government agencies or local authorities for the reduction of air emissions.

#### Consumer and product legislation

The Company's internal legal advisers and regulatory departments keep the Company abreast of generic and industry specific consumer and product-related legislative and regulatory developments, both pending and apparent, and ensure that management and employees are informed and, where necessary, trained on these developments and the implementation thereof. In particular, the draft Regulations relating to Labelling and Advertising of Foodstuffs were published in April 2023, which incorporate substantial changes to the existing Regulations. The affected Group companies have carefully reviewed the draft and provided extensive input to the Consumer Goods Council of South Africa, which consolidated industry feedback and responded to the Department of Health. These draft Regulations seek to impose, inter alia, onerous front of pack warning labels; stringent nutrient cut-off values for total sugar, total sodium, total saturated fatty acids, and the addition of artificial sweeteners; an absolute ban on advertising to children and curtailment of the freedom of commercial speech; the expropriation of proprietary rights, more specifically brand rights and intellectual property rights; limitations on freedom of trade and freedom of association; and unrealistic prescribed letter sizing and languages that must appear on labels. There are also significant conflicts between the existing Regulations and the draft Regulations, with extremely short compliance periods.

Other developments being monitored are the drafting of standard operating procedures for the inspection of agricultural products; the legal challenge to the Department of Agriculture, Land Reform and Rural Development on the seizure of meat analogue products using product names prescribed for meat products; updates to compulsory standards and specifications through the SABS and NRCS; amendments to various European Union Regulations affecting, in particular, I&J; updates to the Advertising Code of Practice to align with EU changes; changes to skincare products, deodorants and antiperspirants export regulations for sub-Saharan African countries; and draft Regulations on the Labelling, Advertising and Composition of Cosmetics, which will change the self-regulatory environment of the Cosmetics Industry to a legislative one with strict requirements.

The Company works closely with relevant industry and government bodies, such as the Consumer Goods Council, Business Unity South Africa, the Department of Health, the Department of Trade and Industry, DFFE, and the Department of Employment and Labour, to contribute to the development of sensible and sustainable legislation and regulations.

The Company's central marketing and Group legal functions ensure that there is adherence to laws, standards, and relevant voluntary codes relating to marketing and communications, including advertising, promotions, competitions, and sponsorships.

All applicable labelling legislation is regularly reviewed and, where appropriate, changes to Company packaging are made. The research and development and regulatory managers in the subsidiary companies are responsible for ensuring applicable compliance.

The Company remains a member of a number of industry associations as set out in more detail in the stakeholder engagement table.

No judgments, damages, penalties, or fines for infringement of or non-compliance with consumer or product-related legislation were recorded and/or levied against the Company, directors, officers or employees during the period under review.

### Major risks

The Company and its subsidiaries have well run governance processes and sound systems of internal control which are effective in managing the conventional key areas of business risk such as brand management, manufacturing, financial management, and information technology. Other risks that are often more challenging to manage, and pose a greater threat to business success, are summarised below and on the following pages:

#### Key risks and impact

### The potential for future lockdowns for epidemics or pandemics

- The loss of life and physical and emotional stress caused by epidemics or pandemics, including lockdowns, forced isolation and quarantine, illness, medical expenses, and the potential loss of employment and income
- Restructuring and retrenchments cannot be ruled out in an economy that is already under strain from social, financial, and political uncertainty
- Lost sales owing to changes in consumer demand
- Business interruption arising from infectious diseases and quarantine protocols and regulations
- Domestic and international restrictions on movements of persons and goods
- Delays in clearing of imported products, raw materials, parts and other supplies, as well as exported products, through customs
- Additional governance and compliance structures and costs
- Heightened risk of debtors, suppliers, and service providers going into business rescue or liquidation

#### Comments

- The AVI employee wellness programme offers counselling to employees and their extended families
- Specialist providers could be contracted to provide vaccines to employees on some of our bigger sites (as was done during the COVID epidemic)
- Ongoing management of costs in the areas of the business that would be most impacted by epidemics or pandemics, to ameliorate the impact of lower volumes and revenue
- Continuous consideration and management of potential logistics delays, including the potential need for the holding of additional buffer stocks
- The Company monitors supplier risk reports from a specialist service provider on a monthly basis, thus enabling the Company to timeously implement mitigating actions wherever possible

#### Failure to stay in touch with and react quickly to changing consumer perspectives and needs

- Lost growth opportunities or erosion of market share
- Pressure on margins in constrained categories
- Under or over-spend of marketing money without an economic imperative could lead to unsustainable or diminishing brand equity
- Product formats and price points are managed flexibly in different parts of the consumer cycle, in line with consumer needs
- Each business unit gives priority to understanding the risks and opportunities that South Africa's growing Black consumer base presents, and responding in a manner appropriate to each category
- Consumer trends in more developed markets are studied for relevance to local markets
- The characteristics of our African export geographies are studied carefully so that we can enhance the relevance of our offering in each geography
- New product development is aligned with the points above and actively pursued
- Brand investment is material and consistent, with ongoing efforts to improve the efficiency and effectiveness of this spend

## Availability of experienced and commercially minded business leaders to seek improvement and grow profits

- This is an ongoing challenge, particularly given the diversity of AVI's operations. Considerable resources are expended in identifying people and, where appropriate, attracting them
- The difficulty in recruiting scarce skills creates, inter alia, poor management depth and limited succession planning with a risk of reduced business credibility and business effectiveness
- Inadequate progress on transformation would make it difficult to attract top equity candidates and reduce credibility with stakeholders and business partners
- The Company has a flexible operating model which provides high transparency to the centre and facilitates effective interaction on key matters when needed
- Remuneration and reward systems provide meaningful wealth generation opportunities for managers who excel but a low level of value in share option schemes in periods of low share price growth means a risk of loss of senior employees to more attractive opportunities, lower morale for senior employees in general, and an environment in which it is harder to attract the best people
- Various formal and informal internal learning and development initiatives are provided as developing in-house talent is becoming increasingly more important

#### Key risks and impact

#### Comments

### Changing competitive landscape that negatively impacts profitability

- The growth of house brands, often based on imported product, means increased price competition, difficulty in getting fair representation on shelf, pressure to manufacture house brands, and changes in consumer perceptions of house brands, which could lead to increased support and investment in capacity for those brands
- There is the risk that additional capacity is created which generates surplus supply and inhibits the ability to generate economic returns on investment
- The Company's best protection in a changing competitive landscape is to continually work to keep our brands and products relevant to consumers, to improve efficiency so that margins can be sustained when prices are constrained, and to be diligent in managing the price / volume / margin equation flexibly as circumstances require
- A volatile currency with the risk of rapid and material weakening has traditionally been an effective protection against import competition
- A fairly small domestic market reduces the attractiveness of major green fields investment in South Africa
- New suppliers or customers entering the South African FMCG market can present both risks and opportunities. We believe that the Company has sufficient scale and relevance with its strong brand portfolio to be important to new entrants, and to be able to forge mutually beneficial trading relationships

### Reliance on third-party brands and diminished profitability if licences are not renewed

- Most of the Company's core brands are owned
- Key third-party brands that the Company has access
  to are the Lacoste brand in Spitz and the Lavazza
  brand in Entyce Beverages. While we have a long
  history of strong and successful relationships with all
  of these parties and believe that our business units
  represent compelling opportunities to each licensor
  that will be difficult for other licensees to match, there
  is always a risk of disproportionate dependence on
  third-party brands and under-investment in owned
  brands
- During the year the decision was taken to not renew the Coty contract. With the acquisition of the Exclamation, Gravity, Whisper and East West brands last year we have reduced our dependency on this relationship

#### Key risks and impact

#### Inability to sustain and grow profit margins

- In a volume constrained environment this will lead to decline in profit and return on capital employed
- The current high inflation environment has seen margin pressure in parts of the business as input cost escalations have not been fully recovered through price increases. An easing of global commodity prices would present an opportunity to recover this lost margin

#### Comments

- Top line growth is a continual focus area for all of our businesses and brings with it the opportunity to leverage fixed costs and expand profit margins
- Many of the Company's Key Value Items ("KVI's")
  enjoy a brand premium because of their long legacy of
  delivery and quality. We seek to preserve this premium
  through retention of product intrinsics and high focus
  on product quality
- A failure to invest in manufacturing capacity and/or technology at the correct time may create a risk of market share erosion from both local sources and imports, and major capacity investment remains imperative
- The Company has extensive exposure to foreign exchange and commodity price volatility. These exposures are hedged in a manner that allows selling prices to be managed predictably and responsibly and historically our businesses with their strong brands have demonstrated the ability to recover lost profit margin fairly quickly after periods of pressure. The notable exception being I&J, which has little ability to compensate for the impact of a strong Rand on its material export revenues, but similarly also benefits materially when the Rand is weaker
- Significant cost inflation, most notably due to fuel prices, with an inability to fully recover through price inflation
- Over-reliance on the strength of core brands could lead to the retardation of key disciplines
- A failure to recognise the importance of product attributes in current or innovated products leading to a reliance on brand equity and/or marketing investment

#### Key risks and impact

### Deteriorating social, political and operating environment

- Diminished capability of government departments and state owned entities, including the deterioration of public infrastructure (roads, railways, ports, etc.), impacts their delivery with concomitant impact on businesses
- Ongoing increases in administered charges for electricity, water, and property rates create additional cost pressure and reduce competitiveness relative to imports
- Increasingly inflexible labour legislation, including
  in particular the changes effected to the Labour
  Relations Act early in 2015, the interpretation of
  this legislation by the Courts in favour of
  permanent employment, and increasing demands
  and industrial action by labour unions, reduce
  competitiveness against imports, increase
  investment hurdles and create a growing disparity
  in wage costs between formal (unionised) and
  informal sectors
- The imposition of price controls pursuant to a populist political and social agenda could impact on parts of the Company's product portfolio
- Dissatisfaction with service delivery by government and municipalities could lead to civil disruption and strikes with a material adverse effect on volumes and profit
- The continued decline of educational standards erodes the supply of essential skills to maintain our medium-term competitiveness
- The emergence of new and ambitious social programmes that place too heavy a burden on organised business and taxpayers, to the extent that the availability of capital reduces in South Africa, and over time that compromises our ability to sustain our current asset base and competitiveness
- Compliance with increasing consumer facing legislation such as that in respect of labelling, advertising, genetically modified organisms ("GMOs"), salt, and sugar, and the increased focus on providing "healthy" alternatives to existing products, requiring increased work and placing pressure on research and development
- The outsourcing of government functions to private entities which results in the creation of additional layers of administration and costs to business, for example the appointment of external assignees in terms of the Agricultural Products Act
- Deterioration of public infrastructure (including roads, railways, and ports)

#### Comments

- Although the Fishing Rights Allocation Process has now been finalised it remains subject to various appeals (appeal outcome expected end of September 2023)
- Delays and the constant need for appeals in the Fishing Rights Application Process prolong uncertainty and delay long-term investment decisions
- In a two-tiered economy the Company increasingly competes against smaller operators that are not measured or monitored against increasingly onerous legislated requirements, where there is an increasing new entrant risk due to low barriers to entry technology and high margins
- Availability of utilities, such as power and water, necessary to run business can be mitigated at extra cost, but reduce competitiveness. The declining quality of municipal water in many areas forces increased dependence on borehole water (where available) or the installation of water filtering and purification plants, all at an extra cost to the businesses
- There is increasing financial demand on the private sector to fund the government's budget deficit and over-reliance on the private sector to address social issues
- Regulators such as the Competition Commission and the Department of Trade and Industry increasingly see their role as maintaining jobs without regard for the underlying economic merit of their decisions and proposals, such as through increasingly restrictive merger control to deal with employment, broadbased ownership, supplier development and localisation, investment, and downstream beneficiation, market enquiries, and changes to the Competition Act to include specific provisions to enable historically disadvantaged persons, and small and medium-sized businesses to participate effectively in the economy
- Changes to the Broad Based Black Economic Empowerment Codes of Good Practice with, inter alia, substantially-increased financial requirements for meeting minimum compliance levels, have had a material negative impact on the scorecard rating and made it difficult to achieve and maintain the historical rating

#### Key risks and impact

#### **Environmental**

- The impact of climate change on natural resources through changing weather patterns and increased global temperatures could affect natural and agricultural resources on which the Company is dependent
- Government commitments to emission-reduction targets and associated regulatory costs could have a significant impact on the operating and distribution practices of the Company

#### Comments

- The Group's activities generally have low environmental impact, and compliance with legislation is good
- Carbon tax is currently relatively low, and work in progress to reduce coal consumption should offset future tax rate increases
- 1&J's fishing and aquaculture activities are well regulated and there is also compliance with a number of industry adopted practices that support sustainable fishing of the hake resource
- The Group continues to evaluate opportunities to invest in alternative power and water sources

### Going forward

The Company will continue reporting on sustainability issues in a way that focuses on material issues and provides a balanced view of the economic, social, and environmental aspects of the Company to stakeholders. In particular, the Company:

 Has noted efforts to unify reporting requirements, in particular the White Paper published by the World Economic Forum in September 2020 and titled "Measuring Stakeholder Capitalism: Towards Common Metrics and Consistent Reporting of Sustainable Value Creation", which seeks to "develop a core set of common metrics and disclosures on non-financial factors". The report sets out a core and expanded set of "Stakeholder Capitalism Metrics", which can be used by companies to align their reporting on environmental, social, and governance indicators ("ESG"). The Company will consider the metrics and disclosures with a view to continual improvement of its own reporting and the setting of relevant objectives and targets.

- Will continue focusing on ESG factors that are directly relevant to the Company's business.
- Will, where appropriate, expand its reporting in response to shareholder requests. In this regard, we have reviewed the recommendations of the Task Force on Climate-related Financial Disclosures and included a summary below of risks, opportunities and financial impacts following the framework provided.

### Climate-related risks, opportunities and financial impacts

1. Cli	imate-related risks:	
a.	Transition risks:	
i.	Policy and legal risks:	<ul> <li>AVI complies fully with the recent carbon tax legislation and expects to be able to maintain compliance with all existing legislation that relates to consumption of different energy sources as well as emissions, effluent, and waste disposal.</li> <li>The Group has not experienced disruption from its suppliers due to the impact of policy and legislation changes on their businesses, and the majority of our purchase spend is with suppliers who have a strong commercial imperative to meet the climate change credentials required by their customers.</li> <li>Wholesaling and retailing AVI's products to consumers is a low impact activity, nevertheless many of our customers have implemented meaningful programmes that support increases in alternative energy consumption and improved waste recycling.</li> <li>We anticipate that policy changes will continue to support increased use of alternative energy in South Africa, providing further opportunities for the Group to evaluate.</li> </ul>
ii.	Technology risks:	<ul> <li>Typically, the Group is in a position to adopt well-established alternative technologies with low operational and cost risk. To date, the majority of changes made in our own supply chain have been accomplished within normal replacement cycles or with the prospect of reasonable return on investment.</li> </ul>
iii.	Market risk:	<ul> <li>AVI is committed to meeting consumer expectations of how brand owners should respond to climate change.</li> <li>The Group is not a direct participant in the climate change industry of goods and services, or adjacent industries that are likely to be impacted.</li> </ul>
iv.	Reputation risk:	<ul> <li>The Group has a good compliance history and continues to make progress in responding to the impacts of climate change, particularly with regard to energy efficiency and emissions.</li> </ul>
b.	Physical risks:	
i.	Acute risk:	<ul> <li>The Group consumes a wide basket of commodities and has always been exposed to events that impact the supply and demand of these items. More frequent and severe climate driven events have the potential to increase physical supply risk and price volatility.</li> </ul>
ii.	Chronic risk:	<ul> <li>Longer-term shifts in climate patterns may impact supply of key commodities and consumer behaviour in time. These risks will be monitored together with other key business risks, and responded to as appropriate.</li> </ul>

#### 2. Climate-related opportunities:

#### a. Resource efficiency:

The Group has a continuous improvement approach to energy efficiency. For
example, many of our sites have been converted to low energy lighting solutions;
as a matter of course electrical drives are converted from fixed speed to variable
speed when they are replaced, and fuel consumption of our vehicle and fishing
fleets is managed against demanding benchmarks.

#### b. Energy source:

- Following an initial project to install solar power at the Isando distribution centre, a Group-wide evaluation of other suitable sites is in progress. Some of the manufacturing sites still utilise coal fired boilers and we are evaluating conversion from coal to gas, which will significantly reduce carbon emissions.
- c. Products and services: Given the relatively low impact of the Group's activities, consumers have not expressed climate change concerns related to our products.

#### d. Markets:

- The Group is not a direct participant in the climate change industry of goods and services, or adjacent industries that are likely to be impacted.
- e. Resilience, being the capacity to respond and manage the risks and opportunities relating to climate change:
- The Group's activities relating to climate change will develop and mature to keep pace with the environment in which we operate. This will include changes in legislative and reporting requirements, as well as consumer preferences.

#### 3. Financial impacts:

- a. The direct costs of meeting legislative changes, is likely to be material over time. AVI's annual carbon tax is approximately R2,4 million per year at current rates, and the change to fuel requirements for I&J's fishing vessels increased their fuel costs by approximately R10 million per year, although efficiency initiatives have provided a partial offset.
- b. Capital investment costs have not been onerous and will be managed in a balanced way, so that required spend is married to return on investment as far as possible.
- c. Cost pressures from emissions taxes and changing legislation requirements within our own, and our suppliers' supply chains, will be ameliorated by cost savings from lower energy consumption as well as other efficiency improvements.
- d. Increasing physical and price risk of key commodities may lead to additional investment in working capital over time.
- e. AVI will continue to protect the long-term profitability of its categories and so far the consequences of changing legislation have been successfully managed within our overall cost basket.
- f. Additional compliance requirements and operating costs add pressure to an already constrained consumer environment, and it is hoped that government will respond to this reality by adopting reasonable timelines and providing effective subsidies for future changes that are required.

### Transformation

The Company recognises the moral, social and economic imperatives to embrace and support transformation in South Africa and to be a valuable participant in the South African economy and society. A transformed company in the South African context is not only one that has a workforce that is representative of the country's racial and gender demographics and that operates with a bias towards broad-based empowerment opportunities, but one that also embraces diversity.

The Company continues to focus on transformation and remains intent on providing a workplace that encourages diversity. Transformation is considered in the context of broad-based black economic empowerment ("BBBEE") and is measured annually by an external verification agency against the generic BBBEE scorecard. A central senior manager actively coordinates the Company's efforts and ensures that the subsidiaries are well educated on the various facets of transformation. The subsidiaries' progress is monitored and they are centrally assisted in their implementation of targets and other initiatives. During the year under review significant time and funds were invested in advancing the transformation plans that had been developed in previous years. The progress of these plans was reviewed at half year and appropriate and revised activities were agreed upon, where necessary.

From F10 to F14, on the original BBBEE Codes of Good Practice, AVI improved its rating from a level 6 contributor (at 53,78%) to a level 4 contributor (at 70,25%). Since 2015 the verifications have been done against the amended Codes and for the first three years the Company consistently achieved a level 7 rating, discounted to level 8. In F18 the Company improved its score and achieved a level 6 rating (78,22 points), which was then discounted to level 7 for failing to achieve the required 40% threshold on supplier development. F19 saw further improvement to a level 5 rating, with no discounting owing to the minimum thresholds for equity ownership, skills development, preferential procurement, supplier development, and enterprise development having been achieved. The consolidated score achieved for F20 was level 6 (at 71,48 points) with no discounting. The main element that contributed to the change from level 5 in 2019 to level 6 in 2020 was Skills Development. This was for two reasons, firstly the inability of the Company to continue with and complete its skills programmes during the COVID-19 lockdown, and secondly a change in the interpretation of the provision relating to the absorption of unemployed learners at the end of their skills programmes. No dispensation was given by the Department of Trade and Industry to take account of the impact of COVID-19. Since F21 the Company has consistently achieved a score of level 5 and met the 40% threshold on all three priority elements, namely ownership, skills development, and enterprise and supplier development.

#### **BBBEE** scorecard

A comparison of the scorecard elements for the last five years is set out below.

Element	2023 %	2022 %	2021 %	2020 %	2019 %
Ownership	71,98	67,88	64,22	54,99	56,45
Management Control	42,56	41,25	40,10	32,67	29,81
Skills Development (including Bonus Points)	62,25	66,73	60,13	68,04	100,75
Enterprise and Supplier Development					
(including Bonus Points)	82,30	85,56	87,87	78,38	81,61
Socio-Economic Development	100	100	100	100	100

### EMPOWERLOGIC

Broad Based Black Economic Empowerment Verification Certificate

**AVI Limited and Subsidiaries** 

#### **Level 5 Contributor**

Messured Et

rompany Name AVI Limited and Subsidiaries

legistration Number 1994/017201/06

AT Number Refer to second page
ddress 2 Harries Road

Illiovo, Johannesburg
2196

B-BBEE Status								
B-BBEE Status Level	Level 5							
Total Points Obtained	78.09	EO: 17.99 points; MC: 8.09 points;	0: 17.99 points; MC: 8.09 points; SD: 12.45 points; ESD: 34.56 points; SED: 5 points					
Discounting Principle Applied	No	Procurement Recognition	80.00%	Participated in Y.E.S Initiative	No			
Empowering Supplier	Yes	Measurement Period Year End	30/06/2023					
Black Voting Rights	25.08%	Black Women Voting Rights	14.25%	Black Designated Groups	1.02%			
Black Economic Interest	16.72%	Black Women Economic Interest	9.11%	Black Youth	1.02%			
51% Black Owned	No	30% Black Women Owned	No	Black Disabled	0.00%			
Normal Flow Through Applied	Yes	Black New Entrants	1.34%	Black Unemployed	0.00%			
Modified Flow Through Applied	No	Mandated Investment Exclusion Applied	No	Black People Living in Rural Areas	0.00%			

Issue Date
Expiry Date
Certificate Number
Version
Applicable Scorecard

19/08/2024 ELC12199RGENBB Final

Amended Codes - Generic

Amended Generic Codes Gazetted on 11 October 2013 and Amendments Gazetted on 31 May 2019

EmpowerLogic (Pty) Ltd



Reg. No.: 1995/000523/07 BBBEE Verification Agency

Per Gianna Le Roux Member - Verification Committe

ccredited #Sanas

This conflictute is the result of an independent and impartial worlfcation of the BBBEE status of the measured entity measured applies the Codes of Cood Practice on Broad Based B Economic Empowement and has been issued in accordance with the EmpowerLogic Verification Certificate Pulicy. This certificate supersedes any previous certificates issued to Massured entity. For enquiries piasse contact EmpowerLogic at 086 111 4003.

#### Ownership

The Company achieved an ownership score of 71,98% and met the 40% threshold for net value (one of the sub-elements of equity ownership). The Company also still benefits from continuing recognition of the Company's Black Staff Empowerment Share Scheme ("the Scheme"), which was launched during January 2007. The Scheme terminated in December 2018 but over the life of the Scheme, 18 301 participants benefited from growth in the AVI share price and received a total gross benefit of R841 million, including 1 598 participants who left the Company's employ in a manner that classified them as "good leavers", which good leavers received a total gross benefit of R106,7 million.

At a subsidiary level, the Company remains committed to ensuring that a direct economic benefit flows to I&J employees.

The I&J Black Staff scheme terminated on 22 December 2021 resulting in a payment of R103,0 million to Black staff participants. Over the life of the scheme significant value was generated for Black staff with the scheme delivering R156,3 million in value to participants. Following the expiry of the scheme in December 2021, the Company's Board approved a new Black staff scheme in terms of which 6,25% of Irvin & Johnson Limited ("I&J Limited") will be held by Black staff up to 2035 through the I and J Staff Holding Company (Pty) Ltd. The share rights scheme that has been implemented delivers value against I&J share price appreciation and is an integral part of I&J's compliance for the allocation of long-term fishing rights.

As reported in previous years, the Company and Irvin & Johnson Holding Company (Pty) Ltd ("I&J Holdco") entered into a broad-based black economic empowerment transaction ("BBBEE Transaction") with Main Street 198 (Pty) Ltd ("Main Street") in 2004 in terms of which Main Street held a 20% shareholding in I&J Holdco.

After being extended in 2012, 2018 and 2022, the BBBEE Transaction came to maturity on 1 July 2023 and was terminated in accordance with the agreements. AVI and I&J are proud to have successfully partnered with Main Street over a 19-year relationship which generated significant value for all parties, including over R202 million in net cash flows for Main Street.

AVI and I&J Holdco are fully committed to transformation in South Africa and have finalised a new broad-based black economic empowerment transaction ("New BBBEE Transaction") resulting in Twincitiesworld (Pty) Ltd ("Twincitiesworld"), a 100% black-owned company, acquiring 18,75% of the issued share capital in I&J Limited. The structure of the New BBBEE Transaction aligns with that previously in place and provides Twincitiesworld with the opportunity to participate in the economic benefits of I&J Limited through a material ownership stake.

Together with the 6,25% shareholding owned by I&J employees, 25% of the issued share capital of I&J Limited is held by black shareholders, thus promoting an equitable and sustainable economic participation through the broad-based sharing of value creation to the benefit of all stakeholders.

The New BBBEE Transaction has been registered as a major BBBEE transaction with the BBBEE Commission in accordance with Regulation 18 of the BBBEE Regulations, and the Department of Forestry, Fisheries and Environment has been notified of the change of shareholding in I&J Limited in accordance with clause 6.2 Policy for the Transfer of Commercial Fishing Rights dated 31 July 2009, as promulgated in terms of section 21 of the Marine Living Resources Act, 1998.

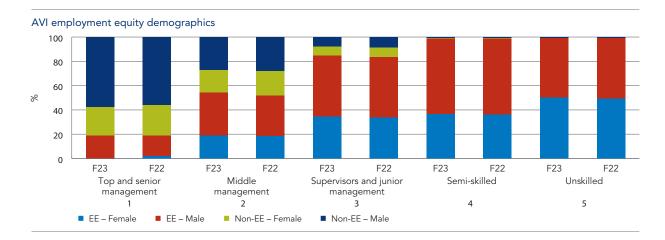
AVI is pleased to have concluded this transaction with partners who are committed to the long-term social upliftment of their communities.

#### Management control

Management control measures both Board participation and employment equity as one element.

The Company achieved a score of 42,56%. Management control is an area of heightened focus for the Company. The Management Control element measures transformation at the Senior, Top, and Board levels and the Employment Equity element measures transformation at the Junior and Middle Management levels.

Attracting senior Black candidates from their current employment in these less than certain economic times is difficult with employees often being loathe to leave existing employment. The Company nonetheless continues its efforts to appoint, develop, and retain Black employees, especially where representation is required in the middle, senior, and top management bands. The Company's employment equity efforts remain behind training, developing, and mentoring



Black employees with the objective of retaining them and preparing them for more senior roles.

#### Skills development

Development of the Company's employees remains a priority. Material progress has been made over the years by originating relevant learning opportunities for a broad community of employees, continually reviewing current learning services and requirements, and enhancing their alignment to the Company's needs. This has assisted the Company in the development of its employees in an appropriate manner, and in progressing the Company's transformation agenda.

The amount spent on recorded skills development initiatives in the past financial year was R73,29 million, equivalent to 2,80% of leviable amount, as defined in the Skills Development Levies Act, namely the total amount of remuneration, paid or payable or deemed to be paid or payable by the Company to its employees during any month. 5 465 employees, or 62,07% of the total workforce (including permanent and fixed term contract employees), were trained during the year, 96,21% of whom were Black and 44,67% of whom were female.

The Company achieved a score of 62,25% (including Bonus Points) and met the required 40% threshold.

The Company continues to have strong and credible relationships with five key Sector Education and Training Authorities ("SETA"), including the Food and Beverage SETA, the Wholesale and Retail SETA, the Transport SETA, the MICT SETA, and the Chemical Industries SETA, which enabled the Company to receive mandatory grant payments of R5,37 million and discretionary grant payments of R2,83 million in the year.

The Group Skills Development Facilitator continues to focus on the management of PIVOTAL (Professional, Vocational, Technical and Academic Learning) programmes. During the year the Company had 540 learners (the majority of whom were Black) on such programmes.

Learnership programmes remain a priority throughout the Group. In the past year National Brands supported 259 learners of whom 70 were unemployed disabled persons on key programmes, including End-User Computing Level 3. National Brands has also enrolled 38 apprentices on critical and scarce trades courses.

I&J has made substantial investments in training unemployed youth for the fishing and broader maritime industry. I&J was also the first Group business to participate in the Youth Employment Service (YES programme) initiated by government in F20 in terms of the BBBEE Act and aimed at youth

employment. In F23 I&J registered a further group of 93 unemployed youths on 12-month youth employment contracts, thereby giving them their first opportunity at employment. During the past year I&J invested in the formal training of 131 people (of whom 55 are disabled) on programmes including NQF4 Management and Leadership Development, and NQF3 End User Computing, as well as Apprenticeship programmes for both employed and unemployed individuals.

Indigo Brands trained 17 learners and focused on NQF3 Business Administration and NQF3 End User Computing. For the period F23 Indigo Brands invested in unemployed Disabled Learnerships.

Spitz successfully enrolled 58 people on the NQF5 Retail Chain Store Manager programme with IMM. In addition, 13 store managers participated in the NQF5 Generic Management programme for wholesale and retail and 16 store managers were enrolled on the NQF4 General Management programme. 13 unemployed, disabled learners were enrolled on an NQF3 and NQF4 Generic Management programme. Six employees' higher education studies are being funded by Spitz bursaries.

Ciro enrolled 12 disabled people on the NQF3 End User Computing programme, and a further 10 employees on NQF4 and NQF5 Generic Management programmes, and a Contact Centre Support programme.

Since the inception of the AVI Graduate Programme in F16, students have had various opportunities within the Group. There are currently 31 graduates enrolled on a 24-month programme across I&J, Spitz, and National Brands. 16 are in their first year and 15 are in the final year of the programme. The Company will try and place all graduates who are in their final year into permanent employment at the end of 2023, having proven themselves through their respective programme experiences. 94% of the graduates are Black. All 31 current graduates have had the opportunity to engage in soft skills and business specific training in order to fast track their development. At this stage there will be 21 new graduate positions in 2024 across National Brands and I&J, spanning various fields such as human resources, finance, engineering, planning, sales, quality, procurement, supply chain, and operational management and systems.

The Company remains focused on the development of online training courses in an effort to reduce the cost and complexity of classroom-based programmes, particularly in the retail businesses. In addition to the initial Customer Service and Payment Administration online courses that were run successfully throughout the Spitz business, there are currently over 60 additional online courses on the system to enable efficient, effective, and personalised knowledge transfer for development, governance, and compliance purposes. These have assisted employees to access knowledge from any location, free of charge, and have enabled a view of their progress and achievements.

The Company will continue identifying other appropriate online training programmes, while

continuing to benefit from the holistic view of our talent and succession strategies across and within our businesses.

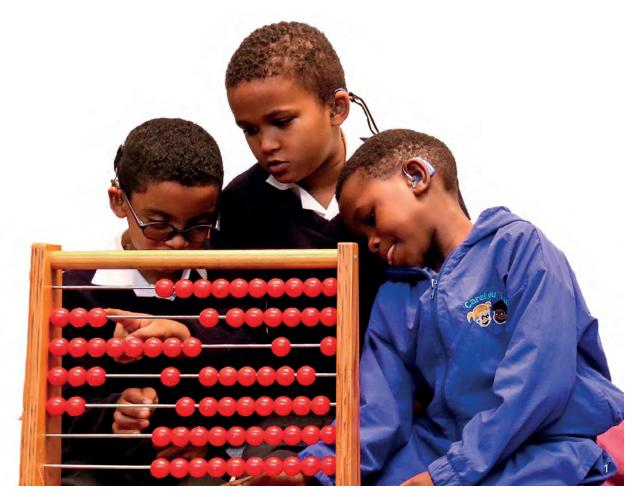
#### **Enterprise and supplier development**

Under the amended Codes this element now comprises preferential procurement, enterprise development, and supplier development.

The Group enterprise and supplier development team, in collaboration with specialist procurers in the Company, and with a focus on favouring local empowering suppliers (as defined in the amended Codes), plays a large role in the Company's enterprise and supplier development strategy. The Company achieved a score of 82,30%. The Company met the 40% threshold in all three elements, namely preferential procurement (93,73%), supplier development (49,55%), and enterprise development (46.05%).

Group enterprise and supplier development work closely with the business unit procurement teams to identify and review potential supplier development projects, both to replace imported raw material/ packaging suppliers and to develop Black-owned suppliers for locally supplied raw materials, services, and/or packaging. Each potential project is reviewed to ensure that the potential supplier meets the criteria stipulated in the Group's Enterprise and Supplier Development Plan and that the project is sustainable. Suitable projects are hard to find and take considerable time to review but once they have been identified and verified as being both commercially viable and contributing towards the sustainable development of local suppliers, agreements are signed and priority given to implementing the projects. Some of the projects that have been implemented and continue to be managed include:

- Early payments to Exempt Micro Enterprises
   ("EME") and Qualifying Small Enterprises ("QSE"),
   which increased by more than 69% compared to the
   previous financial year.
- Funding of select supplier and enterprise development initiatives across a wide range of sectors in collaboration with reputable third-party institutions, such as Inyosi Empowerment and B1SA. Among the enterprise development beneficiaries being funded through Inyosi Empowerment, are Smart Diva Accommodation and Ywaste Solutions, both of whom are beneficiaries of low interest loans and have been graduated by Ciro and I&J respectively, from enterprise development beneficiaries to BBBEE suppliers.
- AVI has also directly provided an interest free enterprise development loan to Delta Wholesale, a 100% black-owned business (with 51,8% black female ownership and 18% black youth ownership).
- Partnering with Inyosi and B1SA to provide the Company's QSE and EME suppliers with access to their buyer/supplier networking platforms, namely iHive Procurement Portal and B1Link respectively.
- Continued focus on graduating enterprise development beneficiaries into long-term Group suppliers.
- Engaging non-compliant suppliers and providing them with training on the BBBEE Codes of Good



Practice in order to empower them to improve their BBBEE scores.

 Investment in a QSE with the requisite technical competence to blend and co-package coffee for selected Ciro products, which investment has yielded pleasing results with a consistent annual growth in volumes.

Procurement from local suppliers and service providers remains a strong focus for the Company. Localisation stimulates local production, creates or sustains employment, helps to improve the quality of local production, and enables better lead times with cost reductions. The following outcomes were achieved in F23:

- Specialised paper wax liners for I&J products, a key product for I&J, which are currently imported from Denmark, China, and the United Kingdom, are in development with a local packaging supplier.
- Ciro has sourced a local manufacturer of specialised cleaning chemicals and detergents to replace materials previously sourced from Italy and Switzerland.
- National Brands has been engaging with local tea growers to expand the volumes currently supplied by them, which has the potential to reduce its heavy reliance on teas sourced from Malawi, Kenya, Zimbabwe, Tanzania, and Sri Lanka.
- A supplier development project for a Procurement e-Catalogue that allows buyers to procure low value, high volume products, has progressed well.

Software development has been completed, tested, and integrated with the Group's ERP system, with suppliers loading their content for phase 1 implementation in August 2023, with a view to enabling suppliers, particularly small and medium-sized enterprises, to gain low cost access to purchasers such as the Company.

#### Currently -

- 86% of local suppliers are BBBEE compliant.
- 10% of the local procurement spend is with EMEs and QSEs.
- 44% of the local procurement spend is with Black-owned vendors.
- 37% of the local procurement spend is with 30% (at least) Black women-owned vendors.

The Company engages with suppliers regarding their transformation needs and requires its suppliers to register on the Department of Trade and Industry IT portal, which provides a single national catalogue of vendors and their BBBEE profiles. In addition, the Company engages with suppliers regarding their empowering supplier status and assists suppliers, where necessary, to achieve this requirement.

The subsidiaries have procurement policies addressing such matters as BBBEE targets, origin of materials, environmental awareness, and sustainability, as well as labour practices and ethics. Potential suppliers are required to undergo a thorough vendor evaluation and selection process and



are required to comply with the AVI Group Supplier Code of Conduct (https://www.avi.co.za/). Wherever possible, locally based suppliers are preferred over international suppliers. The Company makes every effort to ensure that it only does business with suppliers who comply with all applicable legislation and has not identified any of its suppliers where employees' labour and human rights are, or are at risk of, being violated.

#### Corporate social investment

The Company's corporate social investment ("CSI") programme is aimed at bringing about positive social and economic changes to historically disadvantaged communities in the environments in which the Company operates. The Company again achieved a score of 100% for its socio-economic development in the most recent BBBEE rating. On an annual basis an amount of approximately 1% of the Company's pre-tax profits achieved in the previous year is set aside for this purpose. The areas of focus are broadly education and skills development; health and welfare; and social and community development. Grants are managed through the Company's Community Investment Trust. This trust is served by elected

employees who have shown an interest in CSI and an ability to manage the CSI programme. All material projects are properly vetted and monitored by the trustees to ensure that they achieve what was initially intended. In addition, the Company is always cognisant of the impact, both negative and positive, that its operations could have on local communities and commits to identifying any such communities and to engaging with them regarding the prevention or mitigation of negative impacts. For this reason many of the programmes supported by the CSI funding operate in or near to the communities in which the Company's operations are located.

During the year R23,76 million was available to the Company's CSI programmes.

#### Image captions:

- 1. Carel du Toit Trust
- 2, 5. Kliptown Youth Programme
- 3, 6. The Love Trust
- 4. Learn to Earn

The greatest portion of the Company's CSI funding was spent on education and skills development projects, as follows:

- The Ikusasa Student Financial Aid Programme ("ISFAP"), whose stated purpose is to provide needs-based assistance to students from poor and working-class families (the "missing middle"). This support enables students to acquire a broad set of knowledge, skills, and character traits that will significantly improve their meaningful participation in the economy. Areas covered include the economy, human development, leadership, ethical behaviour, and broad citizenship. The intention is to advance equal opportunity and equitable income distribution for all South Africans. The Company is supporting 12 students in Engineering and Food Science courses over their four-year degrees. The contribution provides tuition, meals, accommodation, transport, books, and stipends for selected students over the course of their study period. Additional psycho-social support is also provided by the programme, including academic support, social support, life skills training, mentoring, and medical support.
- The Supplementary Education Trust continues to be a meaningful cause. Through their incubator programme, learners from grades 10 to 12 are exposed to high-quality educational materials and they are provided with expert tuition in English, Mathematics, and Science, on Saturdays and during school holidays, with a view to enabling them to successfully complete their final matriculation exams and further their education at a tertiary institution. In addition, learners in grades 8 and 9 are provided with the same support for Mathematics. The Trust also provides necessary study materials, career guidance, life skills training, transport, and food. The programme seeks to upgrade the learners' academic standards to enable them to further their education at a tertiary institution. The Company has to date invested more than R10 million in the Durban and Winterveldt incubator programmes, as it has done since 2013. These programmes include learners from impoverished homes and underperforming schools in areas such as Umlazi, Inanda, Kwa-Mashu, Claremont, and Mabopane.
- The Diepsloot Foundation, which was founded in 2008, provides Adult Basic Education and Vocational Training as a key component of its strategy to uplift and empower the community through education, vocational training, and enterprise development. The key objective is to channel funding, skills, and resources into sustainable projects that will benefit and build the competencies of individuals and groups within Diepsloot. The projects also allow disadvantaged youth over the age of 18 who have not achieved their matric to achieve a matric-equivalent. Over the years funding from the Company has supported the programme in general and enabled the opening of an Early Childhood Development Centre – Khulani (meaning "to grow").
- The Company has supported the Kliptown Youth Programme since 2008. The organisation was

- founded in 2007 and is situated in the Kliptown informal settlement in Soweto. It provides a safe haven and educational support for children and youth in grades 1 to 12. The programme provides food for the children to take to school and offers a free after-school centre with a hot lunch and additional weekend activities.
- The Ruth First Scholarship Programme sponsors disadvantaged girls' attendance at Jeppe High School for Girls, one of the country's foremost public schools for girls, with full tuition, boarding costs, and pocket money, to grade 12. The Company is currently sponsoring 13 girls in different grades.
- The Rapport Education Fund supports young students from disadvantaged communities with bursaries to enable them to gain a tertiary qualification with a view to qualifying as teachers, many of whom are now teaching at schools in under-privileged communities. The Company has been supporting the programme since 2014 and, in 2022, supported another 27 students.
- The St Mary's School Waverley Foundation provides critical resources and opportunities to girls from disadvantaged communities by supporting their education and training, and the funding of community affairs programmes. The Company is currently committed to funding for two girls for the full terms of their secondary school studies. The bursary includes payments for tuition, boarding, study materials, uniforms, and extra-mural activities, including money to provide the necessary equipment for cultural and sporting activities.
- The Learn to Earn foundation trains students in Basic Computer Skills, Office Administration, Sewing, Hospitality, and Barista programmes, across three learning centres in the Western Cape. Students receive core skills training with supplementary life skills training. The foundation also facilitates access to further education and economic opportunities for their students.
- Afrika Tikkun focuses on education, personal development, career development, nutrition, health, family support, skills development, and ultimately, work placement, through its Cradle to Career Model. The programme focuses mainly on young people between the ages of 18 and 29. The goal is to ensure that young graduates of the skills programmes enjoy a better quality of life through access to employment or self-employment.
- Kingsway Centre of Concern operates the Kingsway School and the Thandanani House of Refuge. The school has 13 teachers and caters for 257 learners from grades 00 to grade 7. The school provides high quality early childhood education to disadvantaged pre-school children from the informal settlement of Zandspruit and its surrounding areas. In addition and aided by a well-supported school nutrition programme, the children receive food parcels to take home. The Company partners with the school to provide much needed support to the foundation phase schooling.
- The My Maths Buddy project of the South African Mathematics Foundation is an initiative to promote excellence in mathematics, improving results for

- both teachers and learners. This is done through focused workshops using the My Maths Buddy book. The book is a mathematics dictionary developed to help understand mathematics terminology. Teachers and learners are taught by the My Maths Buddy project to use the book. During 2022 the Company funded delivery of the project to two schools located in Mangangeni in KwaZulu-Natal, and one school in Bronkhorstspruit.
- The Theo Jackson Jeppe Trust provides scholarships for boys from disadvantaged backgrounds at Jeppe High School for Boys. The Company currently sponsors five boys in different grades. The sponsorship covers the full cost of tuition, boarding, study materials, and extracurricular activities.
- The Two Oceans Education Foundation was
  established to promote and expand on the Two
  Oceans Aquarium educational, conservation, and
  research initiatives. The Foundation places
  emphasis on marine sciences and includes free
  environmental education outreach programmes
  through the Marine Sciences Academy, as well as
  online course and classes that were recently
  launched. The Company currently supports, inter
  alia, the Junior Biologist programme and has made
  it possible for bursary opportunities to be provided
  for students to complete the FET CAPS Marine
  Sciences curriculum.
- Just Grace aims to alleviate poverty in the Langa community in Cape Town by supporting education attainment and skills training. They deliver a range of education, community development, and entrepreneurial projects. They identify projects with community members or through partnerships with local organisations. The Company helps to fund the Just Grace Qhubeka programme, which provides participating youths with comprehensive support and guidance over a four-year period (from grade 9 to grade 12) through 10 sub-projects, namely: academic support, social work counselling and psychosocial support, youth opportunity programme, computer training, weekly book club, computer coding/programming, life skills, women's discussion group, job shadowing, and the holiday
- Love Trust grows leaders and delivers excellent, values-based education to early childhood development teachers and, through the Nokuphila School in Midrand, to 380 vulnerable children in grades 000 to grade 7 from, primarily, Ivory Park and Tembisa in Gauteng. Support includes scholar transport and meals. The Love Trust Teacher Training course is SAQA accredited to ensure the teachers are provided with the required skills.
- LEAP Science and Maths Schools provides free education to students from high-need communities, with mathematics, physical science, and English as mandatory subjects. The extended school day is nine hours and special programmes are held on Saturdays and during school holidays. Every LEAP assisted school is partnered with a more privileged school within the surrounding area. The Company currently supports 10 learners in grades 8 to 10 in two Gauteng schools and one Western Cape school.

- The Michaelhouse Community Partnership Trust partners with 18 local public schools between Lions River and Mooi River in the KwaZulu-Natal Midlands to improve their standard of education and to offer teacher development through training and mentorship. The Company provides ongoing funding for the appointment of Edu-helpers who are qualified or qualifying teachers and are recruited to teach, tutor, coach, or assist with any necessary development programmes in the schools supported by the Trust.
- The Swiss-South African Co-Operation Initiative (SSACI) supports a range of training and job creation projects for South African youth. Its purpose is to enable young people to become more employable by aligning a vocational curriculum to industry's needs through workplace learning. The model comprises six to eight months full-time institutional training at an accredited training centre, followed by 18 months of structured, workplace-based training at a commercial company. Thereafter, the apprentice undergoes a further two to four weeks of trade test preparation before being entered for the trade test. A six-month work readiness programme is included towards the end of the practical workplace-based training in order to prepare the apprentice for the world of work. The Company is supporting nine learners who are in their second year of the programme.
- Olico Maths Education provides high quality maths resources and after-school maths tuition, with a view to fundamentally transforming the academic performance of the students. In 2022 the Company sponsored the programme at the Alex High School.
- The Nthuse Foundation was established in 2013 with the aim of assisting young people with disabilities to obtain a tertiary education. The Company is currently supporting four students to embark on studies in commerce and information technology.
- Safe Study started its programme in 2020 to create safe urban spaces in Johannesburg where underprivileged children can engage in foundation learning programmes that combine arts, academic and mental wellness into one educational experience.

Other worthy initiatives that the Company supported during the year were:

• The National Sea Rescue Institute ("the NSRI") of which I&J is a platinum member, and to which the Company makes an annual donation, is staffed by volunteers and has rescue bases along the coast and on inland waters. Over the years I&J has made a substantial contribution to the organisation's infrastructure, building a state-of-the-art rescue station in the Cape Town harbour, donating a number of rescue craft, and supporting the School Drowning Prevention Programme. This programme has, to date, trained 24 000 children and is aimed at teaching children how to recognise and react appropriately to the threats posed by open bodies of water and to assist in helping those in a potential life threatening situation. The Survival Swimming Programme is a practical approach to drowning prevention using a host of basic swimming principles to increase the chances of survival.

- The Red Cross Children's Hospital, where I&J's contributions since 1997 have funded the construction of consultation rooms, a radiology facility in the trauma unit, an isolation ward in the burns unit, the upgrade and expansion of the Paediatric Intensive Care Unit, expansion of the Emergency Centre, and, in collaboration with government and the Red Cross Children's Trust, the establishment of the Child Speech and Hearing Clinic at the Mitchell's Plain Hospital. In the past year the support from the Company was applied to the Orthopaedic Unit.
- The Whale Coast Conservation Trust ("WCCT") was established in 2002 with the mission of unifying. coordinating, and promoting environmentally sustainable living in the Cape Whale Coast region of the Western Cape. I&J has collaborated with the WCCT to inspire environmental learning and an understanding of one-planet/sustainable lifestyles through sponsorship of environmental education programmes. Following completion of the programme, schools are given "eco-school" status. The Company's continuing contributions assisted the Trust to present a series of expos and provide environmental tours, designed to make children aware of the critical ecological role that estuaries play in the Whale Coast area, to schools in the Gansbaai area.
- The Worldwide Fund for Nature is one of the world's largest and most respected independent conservation organisations. The Company contributes directly to the WWF-South African Sustainable Seafood Initiative ("WWF-SASSI"), which is positioned as the interface between civil society, the private sector and government to drive responsible consumption and sustainable practices throughout the seafood supply chain.
- Enactus promotes and supports leadership and professional development for registered students, challenging students to take entrepreneurial action to enable progress in order to ultimately improve the quality of life and standard of living of marginalised communities. Enactus brings together students, academics, and business leaders who are committed to using the power of entrepreneurial action. Guided by the academics and business leaders, the students create and implement community empowerment projects. During the past year the Company continued supporting the Enactus teams at the Durban University of Technology, the University of the Western Cape, the University of the Witwatersrand, and the University of Pretoria.
- St Mary's Outreach Programme started in 2004 as a Catholic mission and now operates in the rural areas of Marianhill in KwaZulu-Natal, catering for destitute and unemployed youth, women, and children. The programme offers a home drop-in centre for orphaned and vulnerable children, psychosocial counselling, a school health programme, community-based developments, income generation projects, and gardening projects.
- The Carel du Toit Centre, operated by the Carel du Toit Trust, offers detection, intervention, and treatment for hearing impaired children to

- enable them to enter mainstream schooling. Support by the Company enables the programme to have five school buses across five transport routes in the Western Cape for children whose parents are unable to pay for transport. The Centre is the only school of its kind in the Western Cape and most of the learners come from far outlying areas. More than 60% of the learners depend on the transport programme to get to school and back home. The Company has also provided funding for the development of a system for testing babies' hearing at birth, including the upskilling of selected persons with an accredited short course in Newborn Hearing Screening, which is a much-needed resource in the public health sector in particular. Parents of new-borns and young children are now able to access this service through community outreach programmes such as Children Hear and Talk (CHAT).
- Heart-Work reaches prisoners who have never been exposed to personal therapy or have never been afforded the opportunity to learn about their personal emotions in a controlled and secure environment, to curb the re-admittance rate that most prisoners experience, and to learn healthy coping mechanisms and integration skills. The Company's support has enabled the programme to be implemented in six correctional centres across Gauteng.
- Little Eden cares for children and adults with profound intellectual disabilities. They are provided with 24-hour nursing care, medicines, therapy, food, clothing, and shelter. The Company has adopted and fully supports five residents at the centre.
- The Domino Foundation partners with establishments such as early childhood development centres to provide meals, and with community organisations to provide relief hampers. The Foundation operates in 10 communities across KZN and provides meals to over 60 establishments. The Company continues contributing towards these activities in KwaZulu-Natal.
- Graceland provides a place for 20 girls over the age
  of 18 to grow and get ready to step into adult life.
  Together with the Menstruation Foundation they
  are also working on ending period poverty through
  the provision of free, locally made, eco-friendly
  pads and the installation of pad vending machines.
  The Company has sponsored the installation and
  monthly restocking of four sanitary pad dispensing
  machines at four high schools in KZN, Gauteng, and
  the Western Cape.
- The KZN Children's Hospital Trust is working in a public-private partnership with the KZN Department of Health to renovate and re-open the hospital, which opened in 1931 but closed in 1984. The Trust has already made significant progress on the project and the Company has provided funding for the next phase of renovations, being the original Old Main Children's Hospital building. This is a heritage building and requires particular care to be taken in the renovations. Once done the building will house a centre for mental health, offering both outpatient and inpatient services and will address a significant gap in child health services in KZN where

- 88% of children with mental health issues do not have access to the appropriate services.
- Rise Against Hunger is a volunteer-based meal packaging programme. The meals consist of highly nutritious dehydrated meals comprised of rice, soya, and vegetables, which only require water and a basic stovetop to cook. The programmes main focus is children between the ages of 1 and 6 and the support is provided through the ECD Connect programme. The Company's support paid for 80 000 meals for ECD centres in the network. In addition, the programme is included in the Company's annual Mandela Day drive, which enables employees to volunteer to pack and deliver meals.
- The Saartjie Baartman Centre for Women and Children opened in 1999 in response to the high rates of violence against women and children on the Cape Flats. To date they have assisted over 260 000 women and children. The Centre provides a multi-disciplinary service to manage and prevent violence and to assist those in need of support. The Company's contribution to the Centre will enable it to continue providing cost-free services, 365 days a year, to abused women and children, while at the same time working on programmes to address the underlying issues.

The Company has also been involved in or made ad hoc donations to a number of other important initiatives, such as the South African Air Force Association, Action for Blind, Hotel Hope Ministry, Buhle Farmers, The Trauma Centre for Survivors of Violence, Save Our School, Cancer Association of South Africa, Caritas Gemeenskapsfokus, Centre of Excellence Bishop Lavis, Focus on iThemba, CHOC Childhood Cancer Foundation SA, Embocraft Training Centre, Farouk Abrahams Goalkeeper Academy, Boost Africa Foundation, Go for Gold Tuition, Knysna Sedgefield Hospice, Ladles of Love, Lesedi La Batho, New Beginninz, Operation Smile, Siyabonga Africa, The Ark Safe Haven, Service Dining Rooms, The Library Project (The Bookery), and Thomson Smillie.

In addition to contributions made to various organisations by the Trust, I&J also contributed just over R1,13 million directly to a number of programmes aimed at the communities in which its employees live and work, such as Service Dining Rooms, The Children's Hospital Trust, Eleven Express Football Club, Seesterretjies Early Childhood Development Centre, Gansbaai Academia, The Homestead Project

for Street Children, Heideveld Rescue Mission, Lifesaving Cape Town, The Trauma Centre for Survivors of Violence, Abraham Kriel Childcare, Blompark Ikamva Early Childhood Development Centre, Masakhane Pre-School, and SA Harvest.

The AVI Graduate CSI Project was launched in F21 in collaboration with the Trust. The Project is aimed at exposing graduates to social challenges in the country and positioning them to become social change leaders and contributors to the communities in which they live. The graduates choose a number of beneficiaries, which each receive R50 000 from the Trust and the graduates engage with them by providing time or key skills. This year the graduates are working with four non-profit organisations, being the Faith & Hope Foundation, the Jumpstart Foundation Trust, the Seesterretjies Early Childhood Development Centre in Gansbaai, and the Durban Child & Youth Care Centre.

At a more personal level, the Company's employees are encouraged to become involved with their local communities on Company sponsored employee volunteer days. All of the projects are selected from organisations with which the Company has established relationships and the Company gives employees time off to provide their services to these projects. In 2023 employees across the Group participated in the Rise Against Hunger meal packing event on Mandela Day. Five teams packed over 15 000 meals which will feed 70 children for an entire year.

### Good corporate citizenship

The Company recognises the benefits of being a good corporate citizen with a commitment to contributing to sustainable economic, social and environmental development. This is achieved through working with employees, their families, the local communities and society at large to improve quality of life, and being an organisation with which it is desirous to do business.

#### Labour data and practices

Number of permanent employees (South Africa at 30 June)	2023
Fixed term contract	387
Fixed term contract – in-service trainee	1
Fixed term contract – learnership	187
Permanent	8 252
Number of employees by type of employment (Namibia, Zambia and Botswana)	
Fixed term contract	2
Permanent	275

All employees (permanent and fixed term) by region and gender (at 30 June)

Region	Female	Male
Eastern Cape	156	105
Free State	147	62
Gauteng	2 112	1 588
KwaZulu-Natal	955	666
Limpopo	42	45
Mpumalanga	48	50
Northern Cape	7	5
North West	29	30
Western Cape	1 538	1 242
Namibia, Botswana and Zambia	45	232

### New employee hires and terminations (at 30 June)

		Fixed Term Contract (all types)				Permanent			
	Age	Fema	le	Male	9	Fema	le	Male	9
Region	Group	Entry	Exit	Entry	Exit	Entry	Exit	Entry	Exit
Eastern Cape	20 – 40	14	10	20	11	7	14	15	15
	40 – 60	0	0	3	5	1	1	3	4
	60+	0	0	0	0	0	0	0	0
Free State	20 – 40	5	4	12	11	3	8	18	17
	40 - 60	2	1	0	2	2	3	2	5
	60+	0	0	0	0	0	0	0	0
Gauteng	20 – 40	159	107	220	135	79	88	121	161
	40 – 60	10	4	26	15	13	44	25	88
	60+	2	2	0	1	4	2	0	18
KwaZulu-Natal	20 – 40	53	39	75	76	24	28	48	58
	40 – 60	5	3	10	12	2	13	7	27
	60+	0	1	7	8	0	0	0	7
Limpopo	20 – 40	19	17	6	12	19	15	12	11
	40 - 60	5	4	0	0	0	0	1	2
	60+	0	0	0	0	0	0	0	0
Mpumalanga	20 – 40	29	46	11	8	9	10	15	14
	40 – 60	1	1	0	0	0	0	0	2
	60+	0	0	0	0	0	0	0	0
Northern Cape	20 – 40	1	1	2	2	0	2	6	7
	40 – 60	0	0	0	0	0	0	1	1
	60+	0	0	0	0	0	0	0	0
North West	20 – 40	7	7	9	9	5	2	21	18
	40 – 60	0	0	1	1	0	0	3	3
	60+	0	0	0	0	0	0	0	0
Western Cape	20 – 40	135	128	37	58	151	106	61	132
	40 – 60	9	6	11	29	20	5	19	73
	60+	2	3	2	3	0	0	0	0
Namibia,									
Botswana and Zambia	All ages	2	2	2	1	2	2	30	21

	2023	2022	2021	2020	2019
Number of permanent employees (South Africa at 30 June)	8 252	8 412	8 471	8 909	8 504
Gender split (%) (including Foreign)					
• Male	57	58	58	59	60
Female	43	42	42	41	40
Ethnic split (%)					
African	72	72	70	70	69
• White	5	5	6	6	7
• Indian	4	4	3,5	4	4
<ul> <li>Coloured</li> </ul>	18	18	19,5	19	19
Foreign	1	1	1	1	1
Ethnic and gender split (%)					
Black (African, Indian, and					
Coloured) male	53	54	54	55	55
White male	3	3	3	3	4
<ul> <li>Black (African, Indian, and</li> </ul>					
Coloured) female	41	40	39	38	37
White female	2	2	3	3	3
Foreign	1	1	1	1	1

Number of permanent employees (Namibia, Zambia and Botswana at 30 June)	2023
Gender split (%) (including Foreign)	
• Male	85
• Female	15
Ethnic split (%)	
• African	99
• White	0,5
• Indian	0
• Coloured	0
• Foreign	0,5
Ethnic and gender split (%)	
Black (African, Indian, and Coloured) male	84
White male	0,5
Black (African, Indian and Coloured) female	15
White female	0
• Foreign	0,5

During the period under review, approximately 2 889 contractors were employed throughout the Group in terms of substantive agreements with service providers for non-core Group functions, including security, cleaning, and catering. These contractors all have employment agreements with the relevant third-party service providers, who manage all aspects of their remuneration, benefits, working hours, etc. Service providers are required to comply with applicable laws (including those relating to remuneration and employment conditions), as well as the AVI Group Supplier Code of Conduct available on the external Company website (https://www.avi.co.za/).

99% of the employees in the Company's total South African operations are South African citizens. In Namibia, Zambia, and Botswana, 100% of employees are citizens of those countries. 100% of the Company's top and senior management are South African citizens or permanent residents.

Of the Company's permanent employees, 36% are members of recognised trade unions covered by

collective agreements defining the terms of the relationship between the Company, the unions and the members, as well as their engagement on matters ranging from operational changes to annual negotiations on wages and other substantive issues. Union engagement is managed at an executive level within the subsidiaries, with oversight from the Company.

All employees are remunerated based on either external benchmarking and salary surveys or in accordance with collective wage agreements and/or applicable sectoral determinations. Membership of a Group retirement fund is compulsory for all permanent employees (including flexi-time and part-time permanent employees). Such membership includes life and disability cover, with some of the funds also providing funeral benefits. Medical scheme membership is compulsory for all permanent employees within the D, E and F bands and optional for other permanent employees. Fixed term employees are not eligible to join one of the Group's retirement fund or the medical scheme.

All employees are entitled to the leave benefits as provided for in the Basic Conditions of Employment Act, 1997, or the relevant Sectoral Determination, and the AVI Group Leave Policy, including, as applicable, annual leave, maternity leave, parental leave, adoption leave, commissioning parental leave, and family responsibility leave.

The Company requires the subsidiaries to have appropriate policies and procedures to address employee and industrial relations issues and to ensure that these policies and procedures are communicated to all employees and other relevant stakeholders.

The Company commits to and complies with all applicable labour and employment legislation, including legislation pertaining to freedom of association, child labour, and forced and compulsory labour, and is committed to the protection of all employees' human rights, the provision of decent work, and fair and sustainable labour practices. During the year no infringements of these rights or incidents of discrimination were reported.

#### Health, safety and wellness

The Company provides a healthy and safe work environment to its employees as a basic right and recognises that such a workplace enhances employee morale and productivity. It is also recognised that a healthy and safe workplace is essential particularly in the food handling industry and ensures that consumers are protected and product quality is assured.

Health and safety requirements are firstly monitored and reviewed within the risk management framework of the Company and legislative compliance is required as a minimum standard. The requisite health and safety committees are in place and training occurs on an ongoing basis. These on-site committees deal with issues as and when required, and if necessary they elevate matters to the internal review committees to which they report. If necessary, matters are referred to the Company's Board or Audit and Risk Committee. In addition, the Social and Ethics Committee monitors these matters. There are also various supplementary health and wellness initiatives that form part of the Company's employee engagement framework.

Statistically the Company's safety record is viewed against the industry standard disabling injury frequency rate ("DIFR"), which measures the percentage of employees that suffer a disabling injury for every 200 000 man hours worked. A disabling injury is an injury that causes an employee to miss a shift following the one on which they were injured. The Company experienced 76 disabling injuries. These injuries resulted in 682 lost days for the year, and an achieved DIFR of 0,61 for the year.

The Company categorises all injuries into one of three classes. Class 1 being damage that permanently alters a person's life to class 3 that inconveniences a person's life. During the year under review there were zero class 1 injuries, 11 class 2 injuries, and 65 class 3 injuries. Each injury was properly reported and investigated and remedial and preventative actions taken, including where necessary, additional or

improved employee training or changes to the work environment. Throughout the businesses steps are taken to proactively identify and prevent potentially harmful situations and improve employee training. In response to work-related upper limb disorders caused by repetitive motion, Indigo Brands implemented an ergonomic programme whereby evaluations are conducted by an Occupational Therapist to highlight undesirable ergonomic conditions and practices. The Risk Co-ordinator and employees were trained on good ergonomic practices and additional measures to address poor ergonomic conditions are in the process of being implemented.

The high safety standards adopted by the operations are continually being enhanced by accreditations from independent standard-regulating authorities.

Store robberies in the retail sector remain problematic and both Spitz and Green Cross are taking all practical measures to limit the probabilities of and risks associated with robberies in their stores, including continually updating and improving electronic surveillance, and physical security measures. As staff safety is paramount, staff are trained on how to react in the event of a robbery. In addition, Spitz and Green Cross maintain a close relationship with the AVI Employee Wellness Programme to ensure that affected staff receive counselling after any traumatic event.

All of the National Brands manufacturing facilities maintained their Food Safety System Certification ("FSSC") 22000 V5.1. They also maintained their American Institute of Baking ("AIB") Food Safety Standard certifications, acquired and maintained their annual Certificates of Acceptability (now the R638 certificate) from their local municipal authorities, and maintained their ISO 45001 Occupational Health and Safety Management system certifications.

The Indigo Brands cosmetics and aerosol factories are ISO 9001:2015 (quality management system), ISO 22716:2007 (Cosmetics Good Manufacturing Practice) and SANS 1841 (Control of Quality: Trade Metrology Act) certified. In the year under review Indigo Brands maintained compliance against all of these certifications. Indigo Brands actively works with its suppliers and conducts supplier evaluations in the form of cross-functional workshops and engagements, document verification/traceability and/or quality management system audits. This enhances the businesses' quality management capabilities, thus creating greater reliability regarding incoming raw materials and componentry.

The I&J Woodstock and Valued Added Processing sites have Hazard Analysis and Critical Control Points ("HACCP") accreditation, which is regulated by the National Regulator for Compulsory Specifications. Woodstock achieved an "A" rating with British Retail Consortium for Global Standards ("BRC"), while Value Added Processing achieved an "A+" rating, and both facilities retained Higher Level International Food Standard ("IFS") global food safety certification. Other certifications include Marine Stewardship Council ("MSC") Chain of Custody Certification (a sustainability certification) and SANS 1841 (Control of

Quantity – Trade Metrology Act) certification. The independent Micro laboratory (MICRON) at the Woodstock factory has SANAS 17025 accreditation and the Auckland Cold Store in Paarden Island is ISO 22000 and HACCP accredited, as well as ZA 282 certified (certification by the Department of Agriculture allowing the export of frozen product into the Southern African Development Community). The I&J chicken processing plant is ZA 111 certified (certification by the Department of Agriculture allowing the processing of chicken products). In addition to applying standards to the Company's own operations, the factories continue to make progress through supplier audits with a view to having all their suppliers certified to a recognised Food Safety standard. In accordance with customer requirements, the Amfori BSCI social audit was conducted in April 2022 and an "A" rating was achieved in each performance area with zero non-compliances. In recognition thereof the next audit will only be required in 2024. The Amfori BSCI code of conduct and the SMETA audit refer to international conventions such as the Universal Declaration of Human Rights, the Children's Rights and Business Principles, UN Guiding Principles for Business and Human Rights, OECD Guidelines, UN Global Compact, and International Labour Organisation conventions and recommendations relevant to improve working conditions in the supply chain.

All of the Company's sites are reviewed annually by independent risk management consultants and continual improvement is driven through risk committees at each site, which in turn report their findings to the Company's Audit and Risk Committee, which has the responsibility for the consideration of risk management throughout the Group.

The Company is a Top 50 subscriber to the Food Safety Initiative which operates under the auspices of the Consumer Goods Council of South Africa. It takes all reasonable steps to collaborate with stakeholders to ensure that food produced, distributed, and marketed in South Africa meets with the highest standards of food safety and nutrition, and complies with legal requirements or recognised codes of good practice.

The Company has a formal HIV/AIDS policy which details, inter alia, the Company's philosophy, responsibilities, and support programmes. Flowing from this, policies and practices have evolved over the years that include the placement of permanent clinics at the larger sites; knowledge, attitude and practices surveys; awareness and education programmes; voluntary counselling and testing programmes; individual case management; the provision of universal precautions to prevent accidental transmission in the workplace; and the dispensing of free condoms. From time to time, the businesses also run additional campaigns, such as awareness campaigns via WhatsApp groups and quarterly newsletters.

Following the success of the Company-wide HIV/AIDS voluntary counselling and testing ("VCT") programme that was introduced in 2007, the Company offers this

service at all sites to all employees. The VCT programme achieves the objectives of raising awareness, increasing significantly the number of employees that know their HIV status, and providing the Company with detailed information per site so that its efforts are appropriately focused.

Primary healthcare clinics are located at each of the Company's larger sites, manned on a full-time or part-time basis by appropriate medical professionals. These clinics are well equipped to play a material role in the day-to-day healthcare management of the Company's shop floor employees, and in a number of instances provide basic medication to these employees as well as an outreach programme for immediate family members. They also facilitate the management and distribution of chronic medication to employees with chronic conditions, primarily hypertension, diabetes, and HIV/AIDS. Since 2020 the clinics have also been used for COVID-19 screening and the medical staff perform an essential role in screening and identifying high risk employees to enable appropriate mitigation measures to be implemented. The clinics also perform annual and occupational medical checks for all employees, facilitate VCT programmes, and provide flu vaccines to high-risk employees, all at no cost to the employees.

Utilisation levels of the employee wellness programme, managed by ICAS and introduced throughout the Company during April 2009, remain constant and the programme is well used by the Company's HR community, the Company's employees and their immediate families. The employee wellness programme covers areas that address the entire spectrum of psychosocial stressors in the workplace and at home, lifestyle diseases, and work-life balance by providing an independent, impartial, professional, and confidential counselling and advisory service that extends beyond healthcare and, among other services, gives the Company's employees and their immediate family members access to financial and legal advisory services. The Company and its subsidiaries continue to actively promote the use of the employee wellness programme.

In addition to the formal employee wellness programme, a number of sites hold wellness programmes and days on matters such as diabetes; tuberculosis; HIV/AIDS; eye care; cancer awareness; and generally maintaining a healthy lifestyle.

# GRI content index of material issues reported for the period 1 July 2022 to 30 June 2023 with reference to the 2021 GRI Standards

(Page references are to the issues to the extent reported and do not imply full reporting against any standard)

Disclosure	Reference
GRI 2: General Disclosures	
<b>2-1 Organisational details:</b> (a) Legal name (b) Nature of ownership and legal form (c) Location of headquarters (d) Countries of operation	Inside back cover, 110, 111, 125, 135, 150
2-2 Entities included in the organisation's sustainability reporting: (a) List all entities (b) List of entities included in financial reporting (c) Any differences between list of all entities and list of entities included in financial reporting (d) Approach used for consolidating information, including: whether the approach involves adjustments to minority interests; how the approach takes into account mergers, acquisitions, and disposal of entities or parts of entities; whether and how the approach differs across the disclosures in this standard and across material topics	
<b>2-3 Reporting period, frequency, and contact point:</b> (a) Reporting period for and frequency of sustainability reporting (b) Reporting period for financial reporting and, if not aligned to sustainability reporting, explain the reason (c) Publication date of the report or reported information (d) Contact point for questions	
<b>2-4 Restatements of information:</b> Restatements from previous reporting periods and explain: reasons for restatements; effect of restatements	Entire Integrated Annual Report, where applicable
2-5 External assurance: (a) Describe policy and practice for seeking external assurance including whether and how the highest governance body ("board") and senior executives are involved (b) If the sustainability reporting has been externally assured: provide a link or reference to the external assurance report or statements; describe what has been assured and on what basis, including standards used, level of assurance obtained, and any limitation of the assurance process; describe the relationship between the organisation and the assurance provider	33, 91, 117 – 121
<b>2-6 Activities, value chain, and other business relationships:</b> (a) Sector in which organisation is active (b) Describe the value chain, including: organisation's activities, products, services and markets served; supply chain; entities downstream from the organisation and their activities (c) Other relevant business relationships (d) Significant changes in 2-6-a, 2-6-b, and 2-6-c compared to previous reporting period	1
2-7 Employees: (a) Total number of employees and breakdown by gender and region (b) Total number, by gender and region, of: permanent employees; temporary employees; non-guaranteed hours employees; full-time employees; part-time employees (c) Methodologies and assumptions used to compile the data and whether the numbers are reported: in head count, full time equivalent, or other methodology; at the end of the reporting period, as an average across the reporting period, or using another methodology (d) Contextual information necessary to understand the data reported under 2-7-a and 2-7-b (e) Significant fluctuations in the number of employees during the reporting period and between reporting periods	63 – 66
2-8 Workers who are not employees: (a) Total number of workers who are not employees and whose work is controlled by the organisation and describe: most common types of workers and their contractual relationships with the organisation; type of work they perform (b) Describe the methodologies and assumptions used to compile the data, including whether the number of workers who are not employees is reported: in head count, full time equivalent, or using another methodology; at the end of the reporting period, as an average across the reporting period, or using another methodology (c) Significant fluctuations in the number of workers who are not employees during the reporting period and between reporting periods	65
<b>2-9 Governance:</b> (a) Describe the governance structure, including committees of the board (b) List the committees of the board that are responsible for decision making on and overseeing the management of the organisation's impacts on the economy, environment, and people (c) Composition of the board and its committees by: executive and non-executive members; independence; tenure of members; number of other significant positions and commitments held by each member, and the nature of the commitments; gender; under-represented social groups; competencies relevant to the impacts of the organisation; stakeholder representation	84 – 91
<b>2-10 Nomination and selection of the board:</b> (a) Describe the nomination and selection processes for the board and its committees (b) Describe the criteria used for nominating and selecting board members, including whether and how the following are taken into consideration: views of stakeholders (including shareholders); diversity; independence; competencies relevant to the impacts of the organisation	84 – 91

Disclosure	Reference
GRI 2: General Disclosures	
<b>2-11 Chair of the board:</b> (a) Whether the chair of the board is also a senior executive (b) If the chair is also a senior executive, explain their function within the organisation's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated	84 – 91
<b>2-12</b> Role of the board in overseeing the management of impacts: (a) The role of the board and of senior executives in developing, approving, and updating the organisation's purpose, value or mission statements, strategies, policies and goals related to sustainable development (b) The role of the board in overseeing the organisation's due diligence and other processes to identify and manage the organisation's impacts on the economy, environment, and people, including: whether and how the board engages with stakeholders to support these processes; how the board considers the outcomes of these processes (c) Role of the board in reviewing the effectiveness of the organisation's processes as described in 2-12-b and report the frequency of this review	84 – 91
<b>2-13 Delegation of responsibility for managing impacts:</b> (a) How the board delegates responsibility for managing the organisation's impacts on the economy, environment and people, including: whether it has appointed any senior executives for responsibility for the management of impacts; whether it has delegated responsibility for the management of impacts to other employees (b) Process and frequency for senior executives or other employees to report back to the board on the management of the organisation's impacts on the economy, environment, and people	84 – 91
<b>2-14 Role of the board in sustainability reporting:</b> (a) Whether the board is responsible for reviewing and approving the reported information, including the organisation's material topics, and, if so, the process for reviewing and approving the information (b) If the board is not responsible for reviewing and approving the reporting information, including the material topics, explain the reason for this	84 – 91
<b>2-15 Conflicts of interest:</b> (a) Processes for the board to ensure that conflicts of interest are prevented and mitigated (b) Whether conflicts of interest are disclosed to stakeholders, including, at a minimum, conflicts relating to: cross-board memberships; cross-shareholding with suppliers and other stakeholders; existence of controlling shareholders; related parties, their relationships, transactions, and outstanding balances	84 – 91
<b>2-16 Communication of critical concerns:</b> (a) Whether and how critical concerns are communicated to the board (b) Total number and nature of critical concerns communicated to the board during the reporting period	84 – 91
<b>2-17 Collective knowledge of the board:</b> Measures taken to advance the collective knowledge, skills, and experience of the board on sustainable development	84 – 91
<b>2-18 Evaluation of the performance of the board:</b> (a) Processes for evaluating the performance of the board in overseeing the management of the organisation's impacts on the economy, environment, and people (b) Whether the evaluations are independent or not, and the frequency of the evaluations (c) Actions taken in response to the evaluations, including changes to the composition of the board and organisational practices	84 – 91
<b>2-19 Remuneration policies:</b> (a) Describe the remuneration policies for members of the board and senior executives, including: fixed pay and variable pay; sign-on bonuses or recruitment incentive payments; termination payments; clawbacks; retirement benefits (b) How the remuneration policies for members of the board and senior executives relate to their objectives and performance in relation to the management of the organisation's impacts on the economy, environment, and people	92 – 105
<b>2-20 Process to determine remuneration:</b> (a) Process for designing remuneration policies and for determining remuneration, including: whether independent board members or an independent remuneration committee oversees the process; how the views of stakeholders (including shareholders) of remuneration are sought and taken into consideration; whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organisation, its board and senior executives (b) Results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable	92 – 105
<b>2-21 Annual total compensation ratio:</b> (a) Ratio of the annual total compensation for the organisation's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual) (b) Ratio of the percentage increase in annual total compensation for the highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual) (c) Contextual information necessary to understand the data and how the data has been compiled	92 – 105

Disclosure	Reference
GRI 2: General Disclosures	
<b>2-22 Statement on sustainable development strategy:</b> Statement from the board or most senior executives about the relevance of sustainable development to the organisation and its strategy for contributing to sustainable development	6 – 9, 32 – 67
2-23 Policy commitments: (a) Policy commitments for responsible business conduct, including: authoritative intergovernmental instruments that the commitments reference; whether the commitments stipulate conducting due diligence; whether the commitments stipulate applying the precautionary approach; whether the commitments stipulate respecting human rights (b) Policy commitment to respect human rights, including: internationally recognised human rights that the commitment covers; categories of stakeholders, including at-risk and vulnerable groups, that the organisation gives particular attention to in the commitment (c) Links to the policy commitments if publicly available or, if the policy commitments are not publicly available, explain the reason for this (d) Level at which each of the policy commitments was approved within the organisation, including whether this is the most senior level (e) Extent to which the policy commitments apply to the organisation's activities and its business relationships (f) How the policy commitments are communicated to workers, business partners, and other relevant parties	32 – 67
<b>2-24 Embedding policy commitments:</b> How the organisation embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships, including: how it allocates responsibility to implement the commitments across different levels within the organisation; how it integrates the commitments into organisational strategies, operational policies, and operational procedures; how it implements its commitments with and through its business relationships; training provided on implementing the commitments	32 – 67
2-25 Processes to remediate negative impacts: (a) Commitments to provide for or cooperate in the remediation of negative impacts that the organisation identifies it has caused or contributed to (b) Approach to identify and address grievances, including the grievance mechanisms that the organisation has established or participates in (c) Other processes by which the organisation provides for or cooperates in the remediation of negative impacts that it has identified or contributed to (d) How the stakeholders who are the intended users of the grievance mechanisms are involved in the design, review, operation, and improvement of these mechanisms (e) How the organisation tracks the effectiveness of the grievance mechanisms and other remediation processes, and reports examples of their effectiveness, including stakeholder feedback	32 – 67
<b>2-26 Mechanisms for seeking advice and raising concerns:</b> Describe the mechanisms for individuals to: seek advice on implementing the organisation's policies and practices for responsible business conduct; raise concerns about the organisation's business conduct	32 – 67
2-27 Compliance with laws and regulations: (a) Total number of significant instances of non-compliance with laws and regulations during the reporting period and a breakdown of this total by: instances for which fines were incurred; instances for which non-monetary sanctions were incurred (b) Total number and monetary value of fines for instances of non-compliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by: fines for instances of non-compliance with laws and regulations that occurred in the current reporting period; fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods (c) Significant instances of non-compliance (d) How the organisation has determined significant instances of non-compliance	45 and 46
<b>2-28 Membership associations</b> : Industry associations, other membership associations, and national or international advocacy organisations in which the organisation participates in a significant role	34 and 35
<b>2-29 Approach to stakeholder engagement:</b> Approach to engaging with stakeholders, including: categories of stakeholders and how they are identified; purpose of the stakeholder engagement; how the organisation seeks to ensure meaningful stakeholder engagement	34
<b>2-30 Collective bargaining agreements:</b> (a) Percentage of total employees covered by collective bargaining agreements (b) For employees not covered by collective bargaining agreements, whether the organisation determines their working conditions and terms of employment based on collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other organisations	65

Reference

Disciosure	Reterence
GRI 201 – Economic Performance	
<b>201-1 Direct economic value generated and distributed:</b> (a) Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organisation's global operations. If data is presented on a cash basis, report the justification for this decision in addition to reporting the following basis components: direct economic value generated: revenues; economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments; economic value retained: 'direct economic value generated' less 'economic value distributed' (b) Where significant, report EVG&D separately at country, regional, or market levels, and the criteria for defining significance	27 and 28
<b>201-2 Financial implications and other risks and opportunities due to climate change:</b> (a) Risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue, or expenditure, including: a description of the risk or opportunity and its classification as either physical, regulatory, or other; a description of the impact associated with the risk or opportunity; the financial implications of the risk or opportunity before action is taken; the methods used to manage the risk or opportunity; the costs of action taken to manage the risk or opportunity	39 – 45, 51 – 53
201-3 Defined benefit plan obligations and other retirement plans: (a) If the plan's liabilities are met by the organisation's general resources, the estimated value of those liabilities (b) If a separate fund exists to pay the plan's pension liabilities: the extent to which the scheme's liabilities are estimated to be covered by the assets that have been set aside to meet them; the basis on which that estimate has been arrived at; when that estimate was made (c) If a fund set up to pay the plan's pension liabilities is not fully covered, explain the strategy, if any, adopted to work towards full coverage, and the timescale, if any, by which the employer hopes to achieve full coverage (d) Percentage of salary contributed by employee or employer (e) Level of participation in retirement plans	128 and 129, 152 and 153
<b>201-4 Financial assistance received from government:</b> (a) Total monetary value of financial assistance received by the organisation from any government during the reporting period, including: tax relief and tax credits; subsidies; investment grants, research and development grants, and other relevant types of grant; awards; royalty holidays; financial assistance from Export Credit Agencies (ECAs); financial incentives; other financial benefits received or receivable from any government for any operation (b) The information in 201-4-a by country (c) Whether, and the extent to which, any government is present in the shareholding structure	132 and 133
GRI 202: Market Presence	
202-1 Ratios of standard entry level wages by gender compared to local minimum wage: (a) When a significant proportion of employees are compensated based on wages subject to minimum wage rules, report the relevant ratio of the entry level wage by gender at significant locations of operation to the minimum wage (b) When a significant proportion of other workers (excluding employees) performing the organisation's activities are compensated based on wages subject to minimum wage rules, describe the actions taken to determine whether these workers are paid above the minimum wage (c) Whether a local minimum wage is absent or variable at significant locations of operation, by gender. In circumstances in which different minimums can be used as a reference, report which minimum wage is being used (d) The definition used for 'significant locations of operation'	
<b>202-2 Proportion of senior management hired from the local community:</b> (a) Percentage of senior management at significant locations of operation that are hired from the local community (b) The definition used for 'senior management' (c) The organisation's geographical definition of 'local' (d) The definition used for 'significant locations of operation'	Not reported*
GRI 203: Indirect Economic Impacts	
<b>203-1 Infrastructure investments and services supported:</b> (a) Extent of development of significant infrastructure investments and services supported (b) Current or expected impacts on communities and local economies, including positive and negative impacts where relevant (c) Whether these investments and services are commercial, in-kind, or pro bono engagements	Not reported
<b>203-2 Significant indirect economic impacts:</b> (a) Examples of significant identified indirect economic impacts of the organisation, including positive and negative impacts (b) Significance of the indirect economic impacts in the context of external benchmarks and stakeholder priorities, such as national and international standards, protocols, and policy agendas	

Disclosure

Disclosure	Reference
GRI 204: Procurement Practices	
<b>204-1 Proportion of spending on local suppliers:</b> (a) Percentage of the procurement budget used for significant locations of operations that is spent on suppliers local to that operation (b) Organisation's geographical definition of 'local' (c) Definition used for 'significant locations of operation'	58 – 59
GRI 205: Anti-Corruption	
<b>205-1 Operations assessed for risks related to corruption:</b> (a) Total number and percentage of operations assessed for risks related to corruption (b) Significant risks related to corruption identified through the risk assessment	
205-2 Communication and training about anti-corruption policies and procedures: (a) Total number and percentage of governance body members that the organisation's anti-corruption policies and procedures have been communicated to, broken down by region (b) Total number and percentage of employees that the organisation's anti-corruption policies and procedures have been communicated to, broken down by employee category and region (c) Total number and percentage of business partners that the organisation's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organisation's anti-corruption policies and procedures have been communicated to any other persons or organisations (d) Total number and percentage of governance body members that have received training on anti-corruption, broken down by region (e) Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region	
205-3 Confirmed incidents of corruption and actions taken: (a) Total number and nature of confirmed incidents of corruption (b) Total number of confirmed incidents in which employees were dismissed or disciplined for corruption (c) Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption (d) Public legal cases regarding corruption brought against the organisation or its employees during the reporting period and the outcomes of such cases	
GRI 206: Anti-competitive Behaviour	
206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices: (a) Number of legal actions pending or completed during the reporting period regarding anti-competitive behaviour and violations of anti-trust and monopoly legislation in which the organisation has been identified as a participant (b) Main outcomes of completed legal actions, including any decisions or judgments	None
GRI 207: Tax	
<b>207-1 Approach to tax:</b> A description of the approach to tax, including: whether the organisation has a tax strategy and, if so, a link to this strategy if publicly available; the governance body or executive-level position within the organisation that formally reviews and approves the tax strategy, and the frequency of this review; the approach to regulatory compliance; how the approach to tax is linked to the business and sustainable development strategies of the organisation	36
<b>207-2</b> Tax governance, control, and risk management: (a) A description of the tax governance and control framework, including: the governance body or executive-level position within the organisation accountable for compliance with the tax strategy; how the approach to tax is embedded within the organisation; the approach to tax risks, including how risks are identified, managed, and monitored; how compliance with the tax governance and control framework is evaluated (b) Description of the mechanisms to raise concerns about the organisation's business conduct and the organisation's integrity in relation to tax (c) Description of the assurance process for disclosures on tax including, if applicable, a link or reference to the external assurance report or assurance statement	36
<b>207-3 Stakeholder engagement and management of concerns related to tax:</b> Description of the approach to stakeholder engagement and management of stakeholder concerns related to tax, including: the approach to engagement with tax authorities; the approach to public policy advocacy on tax; the processes for collecting and considering the views and concerns of stakeholders, including external stakeholders	

Reference

Disclosure	Reference
GRI 207: Tax	
207-4 Country-by-country reporting: (a) All tax jurisdictions where the entities included in the organisation's audited consolidated financial statements, are resident for tax purposes (b) For each tax jurisdiction: names of the resident entities; primary activities of the organisation; number of employees and the basis of calculation of this number; revenues from third-party sales; revenues from intra-group transactions with other tax jurisdictions; profit/loss before tax; tangible assets other than cash and cash equivalents; corporate income tax paid on a cash basis; corporate income tax accrued on profit/loss; reasons for the difference between corporate income tax accrued on profit/loss and the tax due if the statutory rate is applied to profit/loss before tax (c) The time period covered by the information reported in this disclosure 207-4	107 – 180
GRI 301: Materials	
<b>301-1 Materials used by weight or volume:</b> Total weight or volume of materials that are used to produce and package the organisation's primary products and services during the reporting period, by: non-renewable materials used; renewable materials used	36 – 45
<b>301-2 Recycled input materials used:</b> Percentage of recycled input materials used to manufacture the organisation's primary products and services	36 – 45
<b>301-3 Reclaimed products and their packaging materials:</b> (a) Percentage of reclaimed products and their packaging materials for each product category (b) How the data for this disclosure has been collected	36 – 45
GRI 302: Energy	
<b>302-1 Energy consumption within the organisation:</b> (a) Total fuel consumption from non-renewable sources, in joules or multiples, and including fuel types used (b) Total fuel consumption from renewable sources, in joules or multiples, and including fuel types used (c) In joules, watthours or multiples, the total: electricity consumption; heating consumption; cooling consumption; steam consumption (d) In joules, watthours or multiples, the total: electricity sold; heating sold; cooling sold; steam sold (e) Total energy consumption in joules or multiples (f) Standards, methodologies, assumptions and/or calculation tools used (g) Source of the conversion factors used	40
<b>302-2 Energy consumption outside of the organisation:</b> (a) Energy consumption outside the organisation, in joules or multiples (b) Standards, methodologies, assumptions and/or calculation tools used (c) Source of the conversion factors used	Not reported
<b>302-3 Energy intensity:</b> (a) Energy intensity ratio for the organisation (b) Organisation-specific metric chosen to calculate the ratio (c) Types of energy included in the intensity ratio: whether fuel, electricity, heating, cooling, steam, or all (d) Whether the ratio used energy consumption within the organisation, outside of it, or both	40
<b>302-4 Reduction of energy consumption:</b> (a) Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples (b) Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all (c) Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it (d) Standards, methodologies, assumptions and/or calculation tools used	40
<b>302-5 Reductions in energy requirements of products and services:</b> (a) Reductions in energy requirements of sold products and services achieved during the reporting period, in joules or multiples (b) Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it (c) Standards, methodologies, assumptions, and/or calculation tools used	40
GRI 303: Water and Effluents	
<b>303-1 Interaction with water as a shared resource:</b> (a) Description of how the organisation interacts with water, including how and where water is withdrawn, consumed, and discharged, and the water-related impacts the organisation has caused or contributed to, or that are directly linked to its operations, products, or services by its business relationships (e.g., impacts caused by run-off) (b) Description of the approach used to identify water-related impacts, including the scope of assessments, their time frame, and any tools or methodologies used (c) Description of how water-related impacts are addressed, including how the organisation works with stakeholders to steward water as a shared resource, and how it engages with suppliers or customers with significant water-related impacts (d) Explanation of the process for setting any water-related goals and targets that are part of the organisation's approach to managing water and effluents, and how they relate to public policy and the local context of each area with water stress	38 and 40

Disclosure

Disclosure	Reference
GRI 303: Water and Effluents	
<b>303-2 Management of water discharge-related impacts:</b> Description of any minimum standards set for the quality of effluent discharge, and how these minimum standards were determined, including: how standards for facilities operating in locations with no local discharge requirements were determined; any internally developed water quality standards or guidelines; any sector-specific standards considered; whether the profile of the receiving waterbody was considered	40 – 46
<b>303-3 Water withdrawal:</b> (a) Total water withdrawal from all areas in mega-litres and a breakdown of this total by the following sources, if applicable: surface water; groundwater; seawater; produced water; third-party water (b) Total water withdrawal from all areas with water stress in mega-litres and a breakdown of this total by the following sources, if applicable: surface water; groundwater; seawater; produced water; third-party water, and a breakdown of this total by the withdrawal sources listed before (c) Breakdown of total water withdrawal from each of the sources listed in disclosures 303-3-a and 303-3-b in mega-litres by the following categories: freshwater (< 1 000 mg/L Total Dissolved Solids); other water (> 1 000 mg/L Total Dissolved Solids) (d) Any contextual information necessary to understand how the data has been compiled such as any standards, methodologies, and assumptions used	40 – 46
<b>303-4 Water discharge:</b> (a) Total water discharge to all areas in mega-litres, and a breakdown of this total by the following types of destination, if applicable: surface water; groundwater; seawater; third-party water, and the volume of this sent for use to other organisations, if applicable (b) Breakdown of total water discharge to all areas in mega-litres by the following categories: freshwater; other water (c) Total water discharge to all areas with water stress in mega-litres, and a breakdown of this total by the following categories: freshwater; other water (d) Priority substances of concern for which discharges are treated, including: how priority substances of concern were defined, and any international standard, authoritative list, or criteria used; the approach for setting discharge limits for priority substances of concern; number of incidents of non-compliance with discharge limits (e) Any contextual information necessary to understand how the data has been compiled, such as standards, methodologies, and assumptions used	41 – 46
<b>303-5 Water consumption:</b> (a) Total water consumption from all areas in mega-litres (b) Total water consumption from all areas with water stress in mega-litres (c) Change in water storage in mega-litres, if water storage has been identified as having a significant water-related impact (d) Any contextual information necessary to understand how the data has been compiled, such as any standards, methodologies, and assumptions used, including whether the information is calculated, modelled, or sources from direct measurements and the approach taken for this, such as the use of any sector-specific factors	40
GRI 304: Biodiversity	
<b>304-1</b> Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas: (a) For each operational site owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas, the following information: geographic location; subsurface and underground land that may be owned, leased, or managed by the organisation; position in relation to the protected area (in the area, adjacent to, or containing portions of the protected area) or the high biodiversity value area outside protected areas; type of operation (office, manufacturing or production, or extractive); size of operational site in km² (or another unit, if appropriate); biodiversity value characterised by the attribute of the protected area or area of high biodiversity value outside the protected area (terrestrial, freshwater or maritime ecosystem); biodiversity value characterised by listing of protected status	36 – 39
<b>304-2 Significant impacts of activities, products and services on biodiversity:</b> (a) Nature of significant direct and indirect impacts on biodiversity with reference to one or more of the following: construction or use of manufacturing plants, mines, and transport infrastructure; pollution (introduction of substances that do not naturally occur in the habitat from point and non-point sources); introduction of invasive species, pests, and pathogens; reduction of species; habitat conservation; changes in ecological processes outside the nature range of variation (such as salinity or changes in groundwater level) (b) Significant direct and indirect positive and negative impacts with reference to the following: species affected; extent of areas impacted; duration of impacts; reversibility or irreversibility of the impacts	36 – 39

Disclosure	Reference
GRI 304: Biodiversity	
<b>304-3 Habitats protected or restored:</b> (a) Size and location of all habitat areas protected or restored and whether the success of the restoration measure was or is approved by independent external professionals (b) Whether partnerships exist with third parties to protect or restore habitat areas distinct from where the organisation has overseen and implemented restoration or protection measures (c) Status of each area based on its condition at the close of the reporting period (e) Standards, methodologies, and assumptions used	36 – 39
<b>304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations:</b> Total number of IUCN Red List species and national conservation list species with habitats in areas affected by the operations by level of extinction risk: critically endangered; endangered; vulnerable; never threatened; least concern	36 – 39
GRI 305: Emissions	
<b>305-1 Direct (Scope 1) GHG emissions:</b> (a) Gross direct (Scope 1) GHG emissions in metric tonnes of CO2 or equivalent (b) Gases included in the calculation (c) Biogenic CO2 emissions in metric tonnes of CO2 equivalent (d) Base year for the calculation, if applicable, including: the rationale for choosing it; emissions in the base year; the context for any significant changes in emissions that triggered recalculations of base year emissions (e) Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source (f) Consolidation approach for emissions; whether equity share, financial control, or operational control (g) Standards, methodologies, assumptions, and/or calculation tools used	40
305-2 Energy indirect (Scope 2) GHG emissions: As required in 305-1	Not reported
305-3 Other indirect (Scope 3) GHG emissions: As required in 305-1	Not reported
<b>305-4 Emissions intensity</b> : (a) GHG emissions intensity ratio for the organisation (b) Organisation-specific metric (denominator) chosen to calculate the ratio (c) Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 3), and/or other indirect (Scope 3) (d) Gases included in the calculation	40
<b>305-5 Reduction of GHG emissions:</b> (a) GHG emissions reduced as a direct result of reduction interventions, in metric tonnes of CO2 equivalent (b) Gases included in the calculation (c) Base year or baseline, including the rationale for choosing it (d) Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3) (e) Standards, methodologies, assumptions, and/or calculation tools used	40
<b>305-6 Emissions of ozone-depleting substances (ODS):</b> (a) Production, imports and exports of ODS in metric tonnes of CFC-11 equivalent (b) Substances included in the calculation (c) Source of the emission factors used (d) Standards, methodologies, assumptions, and/or calculations used	Not reported
305-7 Nitrogen oxides (NOx), sulphur oxides (5Ox), and other significant air emissions: (a) Significant air emissions, in kilograms or multiples, for each of the following: NOx; SOx; persistent organic pollutants; volatile organic compounds; hazardous air pollutants; particulate matter; other standard categories of air emissions identified in relevant legislation (b) Source of the emission factors used (c) Standards, methodologies, assumptions, and/or calculation tools used	Not reported
GRI 306: Effluents and Waste	
<b>306-1 Waste generation and significant waste-related impacts:</b> For significant actual and potential waste-related impacts, a description of: the inputs, activities, and outputs that lead or could lead to these impacts; whether these impacts relate to waste generated in the organisation's own activities or to waste generated upstream or downstream in its value chain	39 – 46
<b>306-2 Management of significant waste-related impacts:</b> (a) Actions, including circularity measures, taken to prevent waste generation in the organisation's own activities and upstream and downstream in its value chain, and to manage significant impacts from waste generated (b) If the waste generated by the organisation in its own activities is managed by a third party, a description of the processes used to determine whether the third party manages the waste in line with contractual or legislative obligations (c) The processes used to collect and monitor waste-related data	39 – 46
<b>306-3 Significant spills (2016 standard):</b> (a) Total number and volume of recorded significant spills (b) Additional information for each spill that was reported in the financial statements: location of spill; volume of spill; material of spill, categorised by: oil spills, fuel spills, spills of wastes, spills of chemicals, other (all whether soil or water surfaces) (c) Impacts of significant spills	45 and 46

Disclosure	Reference
GRI 306: Effluents and Waste	
<b>306-3 (2018) Waste generated:</b> (a) Total weight of waste generated in metric tonnes, and a breakdown of this total by composition of the waste (b) Contextual information necessary to understand the data and how the data has been compiled	39 – 46
<b>306-4 Waste diverted from disposal:</b> (a) Total weight of waste diverted from disposal in metric tonnes, and a breakdown of this total by composition of the waste (b) Total weight of hazardous waste diverted from disposal in metric tonnes, and a breakdown of this total by the following recovery operations: preparation for reuse; recycling; other recovery operations (c) Total weight of non-hazardous waste diverted from disposal in metric tonnes, and a breakdown of this total by the following recovery operations: preparation for reuse; recycling; other recovery operations (d) For each of the recovery operations listed in disclosures 306-4-b and 306-4-c a breakdown of the total weight in metric tonnes of hazardous waste and non-hazardous waste diverted from disposal: onsite; offsite (e) Contextual information necessary to understand the data and how the data has been compiled	39 – 46
<b>306-5 Waste directed to disposal:</b> (a) Total weight of waste directed to disposal in metric tonnes, and a breakdown of this total by composition of the waste (b) Total weight of hazardous waste directed to disposal in metric tonnes, and a breakdown of this waste by the following disposal operations: incineration (with energy recovery); incineration (without energy recovery); landfilling; other disposal operations (c) Total weight of non-hazardous waste directed to disposal in metric tonnes, and a breakdown of this waste by the following disposal operations: incineration (with energy recovery); incineration (without energy recovery); landfilling; other disposal operations (d) For each disposal operation listed in disclosures 306-5-b and 306-5-c, a breakdown of the total weight in metric tonnes of hazardous waste and of non-hazardous waste directed to disposal: onsite; offsite (e) Contextual information necessary to understand the data and how the data has been compiled	39 – 46
GRI 308: Supplier Environmental Assessment	
<b>308-1 New suppliers that were screened using environmental criteria:</b> Percentage of new suppliers that were screened using environmental criteria	58 and 59
<b>308-2 Negative environmental impacts in the supply chain and actions taken:</b> (a) Number of suppliers assessed for environmental impacts (b) Number of suppliers identified as having significant actual and potential negative environmental impacts (c) Significant actual and potential negative environmental impacts identified in the supply chain (d) Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment (e) Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why	58 and 59
GRI 401: Employment	
<b>401-1 New employee hires and employee turnover:</b> (a) Total number and rate of new employee hires during the reporting period, by age group, gender and region (b) Total number and rate of employee turnover during the reporting period, by age group, gender and region	63 – 66
<b>401-2</b> Benefits provided to full-time employees that are not provided to temporary or part-time employees: (a) Benefits which are standard for full-time employees but are not provided to temporary or part-time employees by significant locations of operation, including, as a minimum: life insurance; healthcare; disability and invalidity coverage; parental leave; retirement provision; stock ownership; others (b) The definition used for 'significant locations of operation'	63 – 66*
<b>401-3 Parental leave:</b> (a) Total number of employees that were entitled to parental leave, by gender (b) Total number of employees that took parental leave, by gender (c) Total number of employees that returned to work in the reporting period after parental leave ended, by gender (d) Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender (e) Return to work and retention rates of employees that took parental leave, by gender	63 – 66*

Reference

Disclosure	Reference
GRI 403: Occupational Health and Safety	
403-1 Occupational health and safety management system: (a) Statement of whether an occupational health and safety management system has been implemented, including whether: the system has been implemented because of legal requirements and, if so, a list of the requirements; the system has been implemented based on recognised risk management and/or management system standards/guidelines and, if so, a list of the standards/guidelines (b) A description of the scope of workers, activities, and workplaces covered by the occupational health and safety management system, and an explanation of whether and, if so, why any workers, activities, or workplaces are not covered	66 and 67*
403-2 Hazard identification, risk assessment, and incident investigation: (a) Description of the processes used to identify work-related hazards and assess risks on a routine and non-routine basis, and to apply the hierarchy of controls in order to eliminate hazards and minimise risks, including: how the organisation ensures the quality of these processes, including the competency of persons who carry them out; how the results of these processes are used to evaluate and continually improve the occupational health and safety management system (b) Description of the processes for workers to report work-related hazards and hazardous situations, and an explanation of how workers are protected against reprisals (c) Description of the policies and processes for workers to remove themselves from work situations that they believe could cause injury or ill health, and an explanation of how workers are protected against reprisals (e) Description of the processes used to investigate work-related incidents, including the processes to identify hazards and assess risks relating to the incidents, to determine corrective actions using the hierarchy of controls, and to determine improvements needed in the occupational health and safety management system	66 and 67*
<b>403-3 Occupational health services:</b> Description of the occupational health services' functions that contribute to the identification and elimination of hazards and minimisation of risks, and an explanation of how the organisation ensures the quality of these services and facilitates workers' access to them	66 and 67*
403-4 Worker participation, consultation, and communication on health and safety: (a) Description of the processes for worker participation and consultation in the development, implementation, and evaluation of the occupational health and safety management system, and for providing access to and communicating relevant information on occupational health and safety (b) Where formal joint management-worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these committees	66 and 67*
<b>403-5 Worker training on occupational health and safety:</b> Description of any occupational health and safety training provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities, or hazardous situations	66 and 67*
<b>403-6 Promotion of worker health:</b> (a) Explanation of how the organisation facilitates worker access to non-occupational medical and healthcare facilities, and the scope of access provided (b) Description of any voluntary health promotion services and programmes offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organisation facilitates worker access to these services and programmes	66 and 67*
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships: Description of the organisation's approach to preventing or mitigating significant negative occupational health and safety impacts that are directly linked to its operations, products, or services by its business relationships, and the related hazards and risks	66 and 67*
403-8 Workers covered by an occupational health and safety management system: (a) If the organisation has implemented an occupational health and safety management system based on legal requirements and/or recognised standards/guidelines: the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organisation, who are covered by such a system; the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organisation, who are covered by such a system that has been internally audited; the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organisation, who are covered by such a system that has been audited or certified by an external party (b) Whether and, if so, why any workers have been excluded from this disclosure, including the types of workers excluded (c) Any contextual information necessary to understand how the data has been compiled, such as any standards, methodologies, and assumptions used	66 and 67*

Disclosure

Disclosure	Reference
GRI 403: Occupational Health and Safety	
403-9 Work-related injuries: (a) For all employees: number and rate of fatalities as a result of work-related injuries; number and rate of high consequence work-related injuries (excluding fatalities); number and rate of recordable work-related injuries; main types of work-related injuries; and number of hours worked (b) For all workers who are not employees but whose work and/or workplace is controlled by the organisation: number and rate of fatalities as a result of work-related injuries; number and rate of high consequence work-related injuries (excluding fatalities); number and rate of recordable work-related injuries; main types of work-related injuries; and number of hours worked (c) Work-related hazards that pose a risk of high-consequence injury, including: how those hazards are determined; which of these hazards have caused or contributed to high-consequence injuries during the reporting period; actions taken or underway to eliminate these hazards and minimise risks using the hierarchy of controls (d) Any actions taken or underway to eliminate other work-related hazards and minimise risks using the hierarchy of controls (e) Whether the rates have been calculated based on 200 000 or 1 000 000 hours worked (f) Whether and, if so, why any workers have been excluded from this disclosure, including the type of worker excluded (g) Any contextual information necessary to understand how the data has been compiled, such as any standards, methodologies, and assumptions used	66*
403-10 Work-related ill health: (a) For all employees: number of fatalities as a result of work-related ill health; number of cases of recordable work-related ill health; main types of work-related ill health (b) For all workers who are not employees but whose work and/or workplace is controlled by the organisation: number of fatalities as a result of work-related ill health; number of cases of recordable work-related ill health; main types of work-related ill health (c) Work-related hazards that pose a risk of ill health, including: how these hazards have been determined; which of these hazards have caused or contributed to cases of ill health during the reporting period; actions taken or underway to eliminate these hazards and minimise risks using the hierarchy of controls (d) Whether and, if so, why any workers have been excluded from this disclosure, including the type of worker excluded (e) Any contextual information necessary to understand how the data has been compiled, such as any standards, methodologies, and assumptions used	66*
GRI 404: Training and Education	
<b>404-1 Average hours of training per year per employee:</b> Average hours of training that the organisation's employees have undertaken during the reporting period, by: gender; employee category	56 and 57
<b>404-2 Programmes for upgrading employee skills and transition assistance programmes:</b> (a) Type and scope of programmes implemented and assistance provided to upgrade employee skills (b) Transition assistance programmes provided to facilitate continued employment and the management of career endings resulting from retirement or termination of employment	56 and 57
<b>404-3 Percentage of employees receiving regular performance and career development reviews:</b> Percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period	56 and 57
GRI 405: Diversity and Equal Opportunity	
<b>405-1 Diversity of governance bodies and employees:</b> (a) Percentage of individuals within the organisation's governance bodies in each of the following diversity categories: gender; age group (under 30 years; 30-50 years old; over 50 years old); other indicators of diversity where relevant (such as minority or vulnerable groups) (b) Percentage of employees per employee category in each of the following diversity categories: gender; age group (under 30 years; 30-50 years old; over 50 years old); other indicators of diversity where relevant (such as minority or vulnerable groups)	
<b>405-2 Ratio of basic salary and remuneration of women to men:</b> (a) Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation (b) The definition used for 'significant locations of operation'	Not reported
GRI 406: Non-Discrimination	
<b>406-1 Incidents of discrimination and corrective actions taken:</b> (a) Total number of incidents of discrimination during the reporting period (b) Status of the incidents and action taken with reference to the following: incident reviewed by the organisation; remediation plans being implemented; remediation plans that have been implemented, with results reviewed through routine internal management review processes; incident no longer subject to action	None

407-1 Operations and suppliers in which the right to freedom of association and collective bargaining way be at risk; (3) Operations and suppliers in which the right to freedom of association and collective bargaining may be value to the control of type of operation and suppliers; countries or geographic areas with operations and suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to support rights to exercise freedom of association and collective bargaining.  GRI 408: Child Labour  408-1 Operations and suppliers at significant risk for incidents of child labour; (a) Operations and suppliers considered to have significant risk for incidents of child labour; (a) Operations and suppliers considered to have significant risk for incidents of child labour; (a) Operations and suppliers considered at risk (c) Measures taken by the organisation in the reporting period intended to support rights to contribute to the effective abolition of child labour.  GRI 409: Forced or Compulsory Labour  409-1 Operations and suppliers considered at risk (c) Measures taken by the organisation in the reporting period intended to support rights to contribute to the effective abolition of child labour.  GRI 409: Forced or Compulsory Labour  409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to support rights to contribute to the elimination of all forms of forced or compulsory labour either in terms of: type of operation and suppliers considered or suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to support rights to contribute to the elimination of all forms of forced or compulsory labour.  GRI 410: Security personnel trained in human rights policies or procedures; (a) Percentage of GRI 411: Ri	Disclosure	Reference
bargaining may be at risk: (a) Operations and suppliers in which workers' rights to exercise freedom of association or collective bargaining may be violated or at significant risk either in terms of: type of operation and suppliers countries or geographic areas with operations and suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to support rights to exercise freedom of association and collective bargaining  GRI 408: Child Labour  408-1 Operations and suppliers at significant risk for incidents of child labour; (a) Operations and suppliers considered to have significant risk for incidents of child labour; young workers exposed to hazardous work (b) Operations and suppliers considered to have significant risk for incidents of child labour period intended to support rights to contribute to the effective abolition of child labour.  GRI 409: Forced or Compulsory Labour  409-1 Operations and suppliers considered at risk (c) Measures taken by the organisation in the reporting period intended to support rights to contribute to the effective abolition of child labour.  GRI 409: Forced or Compulsory Labour  409-1 Operations and suppliers considered to have significant risk for incidents of forced or compulsory labour: (a) Operations and suppliers considered to have significant risk for incidents of forced or compulsory labour either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to support rights to contribute to the elimination of all forms of forced or compulsory labour.  GRI 410: Security Practices  410-1 Security personnel trained in human rights policies or procedures: (a) Percentage of security personnel who have received formal training in the organisation's human rights policies or specific procedures and their application to security (b) Whether training requirements also apply to third-party organisations providin	GRI 407: Freedom of Association and Collective Bargaining	
408-1 Operations and suppliers at significant risk for incidents of child labour; (a) Operations and suppliers considered to have significant risk for incidents of: child labour; young workers exposed to have significant risk for incidents of child labour either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (c) Measures taken by the organisation in the reporting period intended to support rights to contribute to the effective abolition of child labour  GRI 409: Forced or Compulsory Labour  409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour:  (a) Operations and suppliers at significant risk for incidents of forced or compulsory labour either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to support rights to contribute to the elimination of all forms of forced or compulsory labour  GRI 410: Security Personnel trained in human rights policies or procedures: (a) Percentage of security personnel who have received formal training in the organisation's human rights policies or specific procedures and their application to security (b) Whether training requirements also apply to third-party organisations providing security personnel  GRI 411: Rights of Indigenous Peoples  411-1 Incidents of violations involving rights of indigenous peoples during the reporting period (b) Status of the incidents and actions taken with reference to the following: incident reviewed by the organisation; remediation plans being implemented; remedi	bargaining may be at risk: (a) Operations and suppliers in which workers' rights to exercise freedom of association or collective bargaining may be violated or at significant risk either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to	
and suppliers considered to have significant risk for incidents of: child labour; young workers exposed to hazardous work (b) Operations and suppliers considered to have significant risk for incidents of child labour either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (c) Measures taken by the organisation in the reporting period intended to support rights to contribute to the effective abolition of child labour.  GRI 409: Forced or Compulsory Labour  409:1 Operations and suppliers at significant risk for incidents of forced or compulsory labour:  (a) Operations and suppliers at significant risk for incidents of forced or compulsory labour either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to support rights to contribute to the elimination of all forms of forced or compulsory labour.  GRI 410: Security Personnel trained in human rights policies or procedures: (a) Percentage of security personnel who have received formal training in the organisation's human rights policies or specific procedures and their application to security (b) Whether training requirements also apply to third-party organisations providing security personnel  GRI 411: Rights of Indigenous Peoples  411-1 Incidents of violations involving rights of indigenous peoples during the reporting period (b) Status of the incidents and actions taken with reference to the following: incident reviewed by the organisation; remediation plans being implemented; remediation plans that have been implemented, with results reviewed through routine internal management review process; incident no longer subject to action  GRI 413: Local Communities  413-1 Operations with local community engagement, impact assessments, and/or development programmes, including the use of: social impact assessments, including monitoring; public disclosure	GRI 408: Child Labour	
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labour:  (a) Operations and suppliers considered to have significant risk for incidents of forced or compulsory labour either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to support rights to contribute to the elimination of all forms of forced or compulsory labour  GRI 410: Security personnel trained in human rights policies or procedures: (a) Percentage of security personnel trained in human rights policies or specific procedures and their application to security (b) Whether training requirements also apply to third-party organisations providing security personnel  GRI 411: Rights of Indigenous Peoples  411-1 Incidents of violations involving rights of indigenous peoples during the reporting period (b) Status of the incidents and actions taken with reference to the following: incident reviewed by the organisation; remediation plans being implemented; remediation plans that have been implemented, with results reviewed through routine internal management review process; incident no longer subject to action  GRI 413: Local Communities  413-1 Operations with local community engagement, impact assessments, and/or development programmes, including the use of: social impact assessment impact assessments, based on participatory processes; environmental impact assessments, local community development programmes based on local communities' needs; stakeholder engagement plans based on stakeholder mapping; broad-based local community consultation committees and processes that include vulnerable groups; works councils, occupational health and safety committees, and other workers representation bodies to deal with impacts; formal local community grievance processes  413-2 Operations with significant actual and potential negative impacts on local communities:  Operations with significant	and suppliers considered to have significant risk for incidents of: child labour; young workers exposed to hazardous work (b) Operations and suppliers considered to have significant risk for incidents of child labour either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (c) Measures taken by the organisation in the reporting period intended to support rights to contribute to the effective abolition of child	
(a) Operations and suppliers considered to have significant risk for incidents of forced or compulsory labour either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to support rights to contribute to the elimination of all forms of forced or compulsory labour  GRI 410: Security Practices  410-1 Security personnel trained in human rights policies or procedures: (a) Percentage of security personnel who have received formal training in the organisation's human rights policies or specific procedures and their application to security (b) Whether training requirements also apply to third-party organisations providing security personnel  GRI 411: Rights of Indigenous Peoples  411-1 Incidents of violations involving rights of indigenous people: (a) Total number of identified incidents of violations involving the rights of indigenous peoples during the reporting period (b) Status of the incidents and actions taken with reference to the following: incident reviewed by the organisation; remediation plans being implemented; remediation plans that have been implemented, with results reviewed through routine internal management review process; incident no longer subject to action  GRI 413: Local Communities  413-1 Operations with local community engagement, impact assessments, and/or development programmes; including the use of: social impact assessments, including gender impact assessments, based on participatory processes; environmental impact assessments, local community development programmes based on local communities' needs; stakeholder engagement plans based on stakeholder mapping; broad-based local community consultation committees and processes that include vulnerable groups; works councils, occupational health and safety committees, and other workers representation bodies to deal with impacts; formal local community grievance processes  413-2 Operations with significant	GRI 409: Forced or Compulsory Labour	
410-1 Security personnel trained in human rights policies or procedures: (a) Percentage of security personnel who have received formal training in the organisation's human rights policies or specific procedures and their application to security (b) Whether training requirements also apply to third-party organisations providing security personnel  GRI 411: Rights of Indigenous Peoples  411-1 Incidents of violations involving rights of indigenous people: (a) Total number of identified incidents of violations involving the rights of indigenous peoples during the reporting period (b) Status of the incidents and actions taken with reference to the following: incident reviewed by the organisation; remediation plans being implemented; remediation plans that have been implemented, with results reviewed through routine internal management review process; incident no longer subject to action  GRI 413: Local Communities  413-1 Operations with local community engagement, impact assessments, and/or development programmes, including the use of: social impact assessments, including gender impact assessments, based on participatory processes; environmental impact assessments and ongoing monitoring; public disclosure of results of environmental and social impact assessments; local community development programmes based on local communities' needs; stakeholder engagement plans based on stakeholder mapping; broad-based local community consultation committees and processes that include vulnerable groups; works councils, occupational health and safety committees, and other workers representation bodies to deal with impacts; formal local community grievance processes  413-2 Operations with significant actual and potential negative impacts on local communities:  GRI 414: Supplier Social Assessment  414-1 New suppliers that were screened using social criteria: Percentage of new suppliers that	(a) Operations and suppliers considered to have significant risk for incidents of forced or compulsory labour either in terms of: type of operation and supplier; countries or geographic areas with operations and suppliers considered at risk (b) Measures taken by the organisation in the reporting period intended to support rights to contribute to the elimination of all forms of	
security personnel who have received formal training in the organisation's human rights policies or specific procedures and their application to security (b) Whether training requirements also apply to third-party organisations providing security personnel  GRI 411: Rights of Indigenous Peoples  411-1 Incidents of violations involving rights of indigenous people: (a) Total number of identified incidents of violations involving the rights of indigenous peoples during the reporting period (b) Status of the incidents and actions taken with reference to the following: incident reviewed by the organisation; remediation plans being implemented; remediation plans that have been implemented, with results reviewed through routine internal management review process; incident no longer subject to action  GRI 413: Local Communities  413-1 Operations with local community engagement, impact assessments, and/or development programmes, including the use of: social impact assessments, including gender impact assessments, based on participatory processes; environmental impact assessments and ongoing monitoring; public disclosure of results of environmental and social impact assessments; local community development programmes based on local communities' needs; stakeholder engagement plans based on stakeholder mapping; broad-based local community consultation committees and processes that include vulnerable groups; works councils, occupational health and safety committees, and other workers representation bodies to deal with impacts; formal local community grievance processes  413-2 Operations with significant actual and potential negative impacts on local communities:  Operations with significant actual and potential negative impacts on local communities:  GRI 414: Supplier Social Assessment  414-1 New suppliers that were screened using social criteria: Percentage of new suppliers that	GRI 410: Security Practices	
411-1 Incidents of violations involving rights of indigenous people: (a) Total number of identified incidents of violations involving the rights of indigenous peoples during the reporting period (b) Status of the incidents and actions taken with reference to the following: incident reviewed by the organisation; remediation plans being implemented; remediation plans that have been implemented, with results reviewed through routine internal management review process; incident no longer subject to action  GRI 413: Local Communities  413-1 Operations with local community engagement, impact assessments, and development programmes: Percentage of operations with implemented local community engagement, impact assessments, and/or development programmes, including the use of: social impact assessments, including gender impact assessments, based on participatory processes; environmental impact assessments and ongoing monitoring; public disclosure of results of environmental and social impact assessments; local community development programmes based on local communities' needs; stakeholder engagement plans based on stakeholder mapping; broad-based local community consultation committees and processes that include vulnerable groups; works councils, occupational health and safety committees, and other workers representation bodies to deal with impacts; formal local community grievance processes  413-2 Operations with significant actual and potential negative impacts on local communities: Operations with significant actual and potential negative impacts on local communities: Operations with significant actual and potential negative impacts of operations  GRI 414: Supplier Social Assessment  414-1 New suppliers that were screened using social criteria: Percentage of new suppliers that	security personnel who have received formal training in the organisation's human rights policies or specific procedures and their application to security (b) Whether training requirements also apply	63 – 66*
incidents of violations involving the rights of indigenous peoples during the reporting period (b) Status of the incidents and actions taken with reference to the following: incident reviewed by the organisation; remediation plans being implemented; remediation plans that have been implemented, with results reviewed through routine internal management review process; incident no longer subject to action  GRI 413: Local Communities  413-1 Operations with local community engagement, impact assessments, and development programmes: Percentage of operations with implemented local community engagement, impact assessments, and/or development programmes, including the use of: social impact assessments, including gender impact assessments, based on participatory processes; environmental impact assessments and ongoing monitoring; public disclosure of results of environmental and social impact assessments; local community development programmes based on local communities' needs; stakeholder engagement plans based on stakeholder mapping; broad-based local community consultation committees and processes that include vulnerable groups; works councils, occupational health and safety committees, and other workers representation bodies to deal with impacts; formal local community grievance processes  413-2 Operations with significant actual and potential negative impacts on local communities: Operations with significant actual and potential negative impacts on local communities: OPerations with significant actual and potential negative impacts of operations  GRI 414: Supplier Social Assessment  414-1 New suppliers that were screened using social criteria: Percentage of new suppliers that	GRI 411: Rights of Indigenous Peoples	
413-1 Operations with local community engagement, impact assessments, and development programmes: Percentage of operations with implemented local community engagement, impact assessments, and/or development programmes, including the use of: social impact assessments, including gender impact assessments, based on participatory processes; environmental impact assessments and ongoing monitoring; public disclosure of results of environmental and social impact assessments; local community development programmes based on local communities' needs; stakeholder engagement plans based on stakeholder mapping; broad-based local community consultation committees and processes that include vulnerable groups; works councils, occupational health and safety committees, and other workers representation bodies to deal with impacts; formal local community grievance processes  413-2 Operations with significant actual and potential negative impacts on local communities:  Operations with significant actual and potential negative impacts on local communities:  Operations of the operations; the significant actual and potential negative impacts of operations  GRI 414: Supplier Social Assessment  414-1 New suppliers that were screened using social criteria: Percentage of new suppliers that	incidents of violations involving the rights of indigenous peoples during the reporting period (b) Status of the incidents and actions taken with reference to the following: incident reviewed by the organisation; remediation plans being implemented; remediation plans that have been implemented, with results reviewed through routine internal management review process; incident	Not reported*
programmes: Percentage of operations with implemented local community engagement, impact assessments, and/or development programmes, including the use of: social impact assessments, including gender impact assessments, based on participatory processes; environmental impact assessments and ongoing monitoring; public disclosure of results of environmental and social impact assessments; local community development programmes based on local communities' needs; stakeholder engagement plans based on stakeholder mapping; broad-based local community consultation committees and processes that include vulnerable groups; works councils, occupational health and safety committees, and other workers representation bodies to deal with impacts; formal local community grievance processes  413-2 Operations with significant actual and potential negative impacts on local communities:  Operations with significant actual and potential negative impacts on local communities; including: the location of the operations; the significant actual and potential negative impacts of operations  GRI 414: Supplier Social Assessment  414-1 New suppliers that were screened using social criteria: Percentage of new suppliers that  58 and 59	GRI 413: Local Communities	
Operations with significant actual and potential negative impacts on local communities, including: the location of the operations; the significant actual and potential negative impacts of operations  GRI 414: Supplier Social Assessment  414-1 New suppliers that were screened using social criteria: Percentage of new suppliers that 58 and 59	programmes: Percentage of operations with implemented local community engagement, impact assessments, and/or development programmes, including the use of: social impact assessments, including gender impact assessments, based on participatory processes; environmental impact assessments and ongoing monitoring; public disclosure of results of environmental and social impact assessments; local community development programmes based on local communities' needs; stakeholder engagement plans based on stakeholder mapping; broad-based local community consultation committees and processes that include vulnerable groups; works councils, occupational health and safety committees, and other workers representation bodies to deal with	36 – 53, 59 – 63
<b>414-1 New suppliers that were screened using social criteria:</b> Percentage of new suppliers that 58 and 59	Operations with significant actual and potential negative impacts on local communities, including:	36 – 53
	GRI 414: Supplier Social Assessment	
		58 and 59

Disclosure	Reference
GRI 414: Supplier Social Assessment	
414-2 Negative social impacts in the supply chain and actions taken: (a) Number of suppliers assessed for social impacts (b) Number of suppliers identified as having significant actual and potential negative social impacts (c) Significant actual and potential negative social impacts identified in the supply chain (d) Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment (e) Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why	58 and 59
GRI 415: Public Policy	
<b>415-1 Political contributions:</b> (a) Total monetary value of financial and in-kind political contributions made directly and indirectly by the organisation by country and recipient/beneficiary (b) If applicable, how the monetary value of in-kind contributions was estimated	None
GRI 416: Customer Health and Safety	
<b>416-1</b> Assessment of the health and safety impacts of products and service categories: Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	46*
<b>416-2</b> Incidents of non-compliance concerning the health and safety impacts of products and services: (a) Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and/or services within the reporting period, by: incidents of non-compliance with regulations resulting in a fine or penalty; incidents of non-compliance with regulations resulting in a warning; incidents of non-compliance with voluntary codes (b) If the organisation has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient	None*
GRI 417: Marketing and Labelling	
417-1 Requirements for product and service information and labelling: (a) Whether each of the following types of information is required by the organisation's procedures for product and service information and labelling: sourcing of components of the product or service; content, particularly with regard to substances that might produce an environmental or social impact; safe use of the product or service; disposal of the product and environmental or social impacts; other (explain) (b) Percentage of significant product or service categories covered by and assessed for compliance with such procedures	46*
<b>417-2</b> Incidents of non-compliance concerning product and service information and labelling: (a) Total number of incidents of non-compliance with regulations and/or voluntary codes concerning product and service information and labelling, by: incidents of non-compliance with regulations resulting in a fine or penalty; incidents of non-compliance with regulations resulting in a warning; incidents of non-compliance with voluntary codes (b) If the organisation has not identified any non-compliance with regulations and/or voluntary codes, a brief statement of this fact is sufficient	Not reported*
GRI 417: Marketing and Labelling	
<b>418-1 Substantiated complaints concerning breaches of customer privacy and loss of customer data:</b> (a) Total number of substantiated complaints received concerning breaches of customer privacy, categorised by: complaints received from outside parties and substantiated by the organisation; complaints from regulatory bodies (b) Total number of identified leaks, thefts, or losses of customer data (c) If the organisation has not identified any substantiated complaints, a brief statement of this fact is sufficient	None*

<sup>\*</sup> Comply with local legislation, including but not limited to, labour and employment legislation, collective agreements, consumer legislation, product safety, packaging, etc.