### 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 remain 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





Image captions:

- 1. Leap Science School
- 2. Domino Foundation ECD Nutritional Programme
- 3. Just Grace Qhubeka Youth Development Programme

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 it is desirable to do business with.

The Company endorses the principles set out in the Constitution of the Republic of South Africa, 1996 (including, without limitation, the Bill of Rights in Chapter 2), the International Labour Organisation ("ILO") Labour Standards, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct ("OECD Guidelines"), the UN Universal Declaration of Human Rights, the UN Global Compact, the UN Convention on the Rights of the Child (as amplified in the UNICEF Children's Rights and Business Principles), the UN Guiding Principles on Business and Human Rights, and the UN Sustainable Development Goals, as meaningful frameworks for achieving best social, governance, and environmental practices and outcomes. AVI is committed to responsible business conduct in every aspect of its operations with a view to contributing to economic, environmental, and social progress and achieving sustainable development. AVI is committed to cooperating with relevant stakeholders towards the same end.

### 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 reference 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 73. While these issues have been categorised according to the GRI framework, the Company has not undertaken a detailed self-assessment nor been externally assured, 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 but rather to provide the Company with a basis on which to determine the material topics for reporting.

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.

### 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, as well as the remuneration policy and implementation report</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 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**

- 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 Patagonian Toothfish Industry Association, the South East Coast Inshore Fishing Association, the Responsible Fisheries Alliance, the World Wildlife Fund's Southern African Sustainable Seafood Initiative, the Abalone Farmers' Association of South Africa, and the South African Midwater Trawling Association; the South African Association for Food Science & Technology; the Restaurant Association; the Specialty Coffee Association of South Africa; the Cosmetic, Toiletry & Fragrance Association of South Africa; the Aerosol Manufacturers' Association; the Institute of Packaging SA; the South African Rooibos Council; the Industrial Gas Users Association of South Africa; the South African Association of Freight Forwarders; and the Responsible Packaging Management Association of Southern Africa
- Participation in association initiatives
- Membership of Product Responsibility Organisations in the packaging industry, including Metpac, Polyco, The Glass Recycling Company, and Fibre Circle

### Government or regulators

- Regular contact with relevant industry and government bodies, such as the
  Consumer Goods Council; Business Unity South Africa; the National Regulator for
  Compulsory Specifications; the Abalone Export Council; the SA Maritime Safety
  Authority; Transnet National Port Authority; the Department of Health ("DoH");
  the Department of Agriculture, Land Reform and Rural Development ("DALRRD");
  the Department of Trade and Industry; the Department of Forestry, Fisheries, and
  the Environment; and, the Department of Employment and Labour, to contribute
  to the development of sensible and sustainable legislation and regulations
- Participation in industry or government crisis management teams

### **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 but without limitation, 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-conduct-ethics/). The code is aligned with the recommendations in the King IV report, the ILO Labour Standards, the OECD Guidelines, and the United Nations Universal Declaration of Human Rights, and is regularly reviewed to ensure that it remains up to date and relevant. In order to obtain a fuller picture of the Company's commitment to the issues addressed in the code, stakeholders are encouraged to access and read the code.

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 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. 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.

There was one substantiated cyber breach during the reporting period, which was internally identified. An employee gained unauthorised access to the HR Admin Workflow environment on SharePoint and viewed documents for which he did not have authorisation. This arose from a security scope limitation in SharePoint Server 2019 licensed software that failed to trigger error or use threshold reached notifications. All access to the HR Admin Workflow environment was immediately revoked, the security scope reset, a new document library created, and the initiation workflow to set document permissions was updated. The analysis did not identify any documents that were downloaded or printed and the security risk was assessed as low. The employee indicated that his intention was to prove that the system was vulnerable as he self-reported the vulnerability to the AVI Hotline and his line manager. The breach was reported to the Information Regulator as required.

No complaints concerning breaches of customer or supplier privacy and/or loss of customer and/or supplier data were received from external sources or from the Information Regulator.

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/) ("supplier code"). More details regarding the supplier code and compliance therewith, are contained in the section of this report titled "Supply Chain". In order to obtain a fuller picture of the Company's commitment to the issues addressed in the supplier code, stakeholders are encouraged to access and read the supplier code.

AVI is committed to conducting its activities in a manner consistent with all applicable competition laws and regulations. AVI cooperates with the competition authorities as and when required, providing responses to requests for information as promptly and completely as practicably possible. No legal actions were pending or completed during the reporting period regarding anti-competitive behaviour or violations of abuse of a dominant position in which the Company (or any of its subsidiaries) were identified as a participant.

The Company is an apolitical enterprise and its funds, goods, or services may not be used as contributions to political parties and/or their candidates and/or unions and/or union officials, and the Company's facilities may not be made available to political candidates and/or union officials or their campaigns (other than as specifically provided for in formal recognition agreements between the Group companies and trade unions). No financial or in-kind political contributions were made by the Company, directly or indirectly, in any country in which it operates.

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 2025 is 27,07%.

# 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. I&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.

Furthermore, following the 2020/2021 Fishing Rights Allocation Process and subsequent appeals, I&J was also successful in securing 29,45% of the Hake Deep Sea Trawl Total Allowable Catch ("TAC"), representing a 5,0% reduction against the previously held rights. This, together with the Hake Inshore Trawl rights represents 25,8% of the total Hake TAC.

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 based on scientific advice and stock assessments 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.

Hake TAC levels are determined using a conservative, science-based approach that incorporates catch data from industry and annual biomass surveys conducted by the DFFE. These surveys are carried out by DFFE scientists using government or chartered research vessels.

The following graph 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:

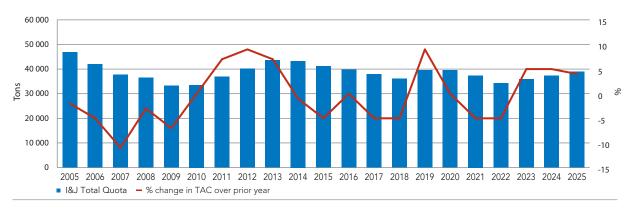
Recent years have seen an increase in the proportion of smaller hake in I&J's catch, which has negatively impacted freezer catch rates and land-based processing efficiency. Whilst this trend presents short-term operational challenges, it is a natural part of the biomass cycle and indicative of strong recruitment – a positive sign for long-term sustainability.

Environmental conditions, including ocean temperatures and weather patterns, continue influencing fish availability and catch rates. Although storm frequency has not increased significantly off the South African coast, storm intensity has risen, with higher wave heights and wind speeds being recorded. These conditions, while not necessarily detrimental to biomass, do impact 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. Annual surveillance audits are conducted by independent, MSC-accredited certification bodies, with full recertification required every four years. The next surveillance audit for MSC chain of custody is scheduled for September
- 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

### I&J TAC 2005 to 2025



fisheries. EAF seeks to protect and enhance the health of marine ecosystems. The goals of the RFA include promoting and funding research into responsible fisheries' practices, influencing policy on fisheries' governance, and supporting skills development and research in the industry.

- Operational Management Procedure ("OMP") and TAC: The South African Hake Trawl Fishery was one of the first in the world to implement an OMP for hake, which sets the 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 and Endangered, Threatened, and Protected (ETP) and Vulnerable Marine Ecosystem (VME) protection: 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 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, including a third-party observer programme and self-reporting system.
- Certification by the Aquaculture Stewardship Council ("ASC"): I&J's Aquaculture Division achieved recertification of the Farmed Abalone operation in 2025. Similar to the MSC, annual surveillance audits are conducted by independent, ASC-accredited certification bodies, with full recertification required every three years. ASC certification proves I&J's commitment and compliance to sustainable farming practices. This certification is valid until 2028.

#### Water

Water is, and always will be, a scarce resource throughout South Africa. There is no region in South Africa where water stress is not a priority problem. Each area experiences water issues owing to a number of factors, including but not limited to, excessive use, growing demand, pollution, thirsty invasive plants, inadequate infrastructure, and poor practices. There is no single solution to the problem and potential shortages, interruption of municipal supply, and quality of water have been identified as risks at most of the Company's facilities. The Company has invested substantial time and money to mitigate these risks, including using purified borehole water, installing back-up water tanks, recycling condensate and effluent, installing a desalination processing plant at I&J, and taking action to measure and better manage water consumption. Water usage management plans can include measuring water usage to identify saving opportunities, optimising equipment to reduce evaporation, replacing fixtures

with water-efficient fixtures, using waterwise landscaping and irrigation, and recovering condensate. The Company is acutely aware of the need to not only manage the risks associated with water shortages, but also to manage the resource as a whole. The Company is committed to monitoring the impact of its operations on water sources and engaging with relevant stakeholders, including DFFE.

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 local 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, a water-wise garden, and a chlorine dosing system installed in the potable water reticulation system after tests showed a lack of free chlorine in the municipal water supply. Over and above the current back-up water storage tanks, Indigo Brands will rely on potable water transported from the I&J water purification plant in the event of municipal supply interruptions and is planning to potentially add an additional 179 cubic meters of potable water storage in F26.

Persistent water outages in the Isando area continued during F25, impacting all the factories and distribution centres in the area, including Ciro, despite both the Isando Coffee & Creamer factory and the Isando Biscuit factory having back-up water supplies, with additional tanks having been installed at the Isando Biscuit factory during F25. The Ciro distribution centre was incorporated into the AVI Isando distribution centre towards the end of F25 and it is anticipated that this will result in, inter alia, a water consumption reduction of approximately 4 000 litres in F26.

Applications for the installation of boreholes and the issuing of water use licenses for the Isando and Westmead Biscuit factories, the Isando Coffee & Creamer factory, the Rosslyn Snacks factory, and the Bryanston office, are in progress. Water extracted from the boreholes for production use or human consumption would be purified through cartridge filtration, reverse osmosis, and disinfection to acceptable SANS:241 standards by on-site water treatment plants. Water treatment plants are already in place at the Isando and Westmead factories and the installation of a Water Treatment Plant at the Rosslyn Snacks factory is currently in progress and

planned for completion during the first half of F26. This includes the installation of new, larger water storage tanks adequately sized for the site's potable and fire water requirements. The water treatment plants will also have the ability to treat any out-of-specification municipal water.

#### Energy

The extreme energy shortages experienced in South Africa over the past years highlighted the need for the Company to be more self-sufficient and to make energy conservation a priority. The subsidiary companies implemented numerous energy-saving initiatives to manage energy usage and, at the same time, generators were installed at most of the Company's facilities to ensure continuity of supply. The generator installations across the Group ran for a total of 2 963 hours in 2025, against 11 674 hours in 2024, when energy generation from the main grid reached a particular low point. Unfortunately, given the unpredictability of electricity generated and available for distribution in South Africa, as well as the failing state of municipal infrastructure, generators remain an essential feature of business. The generators help to sustain production throughput and customer service levels through periods of unpredictable supply and repeated load-shedding, albeit at an increased cost and increased diesel usage.

Where viable, the Company has also installed solar power at certain sites, including its Illovo and Bryanston office blocks and the Isando Distribution Centre, to not only mitigate the impacts of loadshedding but also to try and replace or, at least, supplement electricity supply from the main grid and reduce the Company's overall reliance on fossil fuel-based energy sources, including supply from the main grid and generators. Solar power is not, however, always suitable for industrial facilities given the large inductive loads and limited roof space. To operate a factory using solar would require a significantly oversized solar installation to ensure sufficient generation even during the winter months, and large batteries, which is neither feasible nor financially viable. Typically a factory can benefit from a solar system providing between 20-50% of a factories' annual electricity needs without the need for a battery, which could increase the self-sufficiency of a site depending on the profile of consumption. Ideally, factory solar systems work well to supplement grid supplied electricity, particularly when onsite solar generation is not providing e.g. at night. The subsidiary businesses continue exploring opportunities and solutions for more environmentally friendly energy sources, including consideration of wheeling arrangements.

The integration of the Ciro distribution centre into the AVI Isando distribution centre at the end of F25, is expected to achieve an electricity consumption reduction of approximately 485 000 kWh in F26.

Whilst the Company is not a large-scale gas user, natural gas is one of the energy sources used by the Company. The projected sharp decline in natural gas supply to South Africa from Mozambique by July 2028, poses a challenge to not only the Company

but to South Africa's energy security as a whole. As a member of the Industrial Gas Users Association of South Africa the Company is part of a coordinated action to mitigate the expected decline in natural gas supply.

Details of other 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 has been renewed every three years since then, with the current certification valid until 2028. This eco-label is used to guarantee 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, FSSC 22000, 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 ("NFMRA")

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.

The ABS Agreement stipulates that benefits are gathered at one point in the value chain and that these will be paid by the processors as the Category A applicants. National Brands Limited is a Category B applicant and only buys Rooibos from Category A applicants with valid biotrade/bioprospecting permits.

A total benefit of R36,1 million has been shared by the Category A applicants for the 2019 – 2023 volume years with the funds paid over to the Bioprospecting

Trust Fund on an annual basis. The industry is up to date with the TK (traditional knowledge) levy payments and is currently in the process of finalising the administrative processes for the 2024 volume year.

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 reviewing and 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.

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.

### Climate change

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.

The Company has noted the publication of the following documents:

• The Climate Change Act, 2024, published on 23 July 2024: The Act establishes a legal framework in South Africa for the regulation of the impacts of climate change with the ultimate and aspirational goal of achieving net-zero by 2050. The most significant aspect of the Bill for the private sector will be the framework for the regulation of greenhouse gas emitting sectors. Until the sectoral emission targets and carbon budgets are published the Company will continue measuring, monitoring, and reporting its emissions in terms of the National Greenhouse Gas Emission Reporting Regulations and paying its carbon tax in terms of the Carbon Tax Act, 2019. For now the Company has noted the aspirational goals and the timelines and will monitor progress on the effective date of the Bill and implementation thereafter;

- The Carbon Tax Discussion Paper in respect of Phase Two of the Carbon Tax: As one of the top 20 highest global carbon emitter countries, the South African government has committed to reduce emissions, increase ambition, and contribute to global efforts to curb emissions, limit warming to well below 2°C above pre-industrial levels, and to pursue efforts to achieve the 1,5°C temperature goal. Achieving this will require a rapid and significant decline in greenhouse gas emissions from electricity generation and transport combined with appropriate reductions in industrial process emissions, to be addressed through the Climate Change Act; and
- The Government's updated draft Nationally Determined Contribution ("NDC"): This document is an update to South Africa's first NDC communicated under the Paris Agreement in 2016 and is underpinned by the Climate Change Act. The draft proposes downwardly revised GHG emissions targets for 2025 and 2030 based on an assessment of South Africa's "fair share" of global emissions in accordance with the latest science, and an assessment of the likely GHG emissions outcome of the implementation of current South African policies. The draft NDC also addresses a just transition framework, climate finance, and adaptation measures.

South Africa and, in turn, South African manufacturers, are highly dependent on fossil fuels for the generation of electricity. This creates significant environmental risks to the climate and challenges for businesses operating in South Africa. Whilst the Company is committed to reducing emissions from its own operations, despite their low impact, and to supporting government's efforts to reduce emissions from electricity generation and transport, this will require structural changes and increased international climate finance. The Company has already started investing in solar energy systems and investigating other alternative energy sources, as reported on page 39 and will continue doing so with a view to migrating to alternative energy systems, either wholly or partially, wherever possible.



### 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. Whilst these indicators are helpful in understanding the Company's environmental impact on an annual basis, it must also be borne in mind that increases in water and energy consumption cannot be read in isolation as these increases are directly related to performance and output and do not necessarily reflect inefficiencies or abuses in the utilisation of such resources or a disregard for the need to manage natural resources. Increased factory output, which increases productivity and profitability, will naturally require increased water and energy consumption. As set out more fully elsewhere in this report, the businesses are continually looking for and finding ways to become more water and energy efficient:

			Carbon			Data		
	Indicator	Unit	(kg)	F25	F24	F23	F22	F21
1	Water consumption by source –							
1.1	Municipal*	Litres	201 211	675 204 151	687 597 914	663 883 541	663 565 098	589 855 793
1.2	Ground water (borehole)	Litres	61 879	207 648 000	209 808 000	196 640 000	209 967 000	128 601 729
1.3	Other (desalinated)	Litres	61 123	17 217 720	22 421 000	24 541 000	20 943 500	24 885 000
2	Energy consumption by source –							
2.1	Purchased electricity	kWh	87 268 260	84 726 466	86 109 829	83 853 489	95 391 743	101 639 745
2.2	Coal	Tons	33 049 162	11 569	15 021	14 271	14 668	14 532
2.3	Petrol	Litres	1 906 201	680 786	583 559	682 703	539 099	594 599
2.4	Diesel	Litres	59 454 255	20 056 220	20 537 262	21 735 034	21 657 784	20 093 935
2.5	Liquified petroleum gas (LPG)	Litres	1 799 098	1 847 565	1 888 424	2 101 519	2 063 795	2 017 449
2.6	Natural gas	Cubic metres	6 792	2 488 011	2 570 571	2 802 749	2 835 133	2 931 147
2.7	Heavy marine fuel/Jet fuel	Litres	1 659 993	553 331	518 663	513 815	502 912	856 046
2.8	Paraffin	Litres	3 328 154	330 845	372 884	343 832	411 389	518 920
3	Carbon emissions for above indicators –		188 796 128					
3.1	Total carbon emissions	Metric tonnes	188 796	188 796	201 618	200 877	213 866	217 512
3.2	Carbon emissions per employee	Metric tonnes		23	24	23	25	25
4	General –							
4.1	Carbon tax paid in F25	Rand		2 586 272	2 540 356	2 419 539	2 205 702	2 356 272
4.2	Generator running hours	Hours		2 963	12 881	10 898	2 612	1 231
4.3	Energy generated by solar power	kWh		279 107	329 667			

<sup>\*</sup> Includes a credit for 3 920 000 litres made by the Ekurhuleni Municipality in respect of the Ciro Warehouse.

To gain more insight into the material sources of the Company's carbon emissions, the following table reflects the total carbon emissions for just the manufacturing and fishing businesses over the past five years, all of which show a significant reduction since F21:

	Total carbon emissions	Total carbon emissions	Total carbon emissions	Total carbon emissions	Total carbon emissions
	F25	F24	F23	F22	F21
	(metric	(metric	(metric	(metric	(metric
Business	tonnes)	tonnes)	tonnes)	tonnes	tonnes)
National Brands	70 572	83 827	80 749	83 171	84 040
Indigo Brands	3 315	3 207	3 937	3 843	3 838
1&J	102 763	102 015	102 960	113 741	114 379
NBL, Indigo, and I&J total	176 650	189 779	187 646	200 755	202 257
Total Group	188 796	201 615	200 877	213 866	217 512
NBL, Indigo, and I&J percentage of total Group (%)	94	94	93	94	93

The most significant emissions arise from the use of purchased electricity (generated from fossil fuels), coal for coal-powered boilers, petrol, diesel, heavy marine fuel, and jet fuel. Purchased electricity generated from fossil fuels is an area of priority for the South African government in terms of its commitment to reduce carbon emissions. South Africa still has a long way to go before it can successfully reduce its carbon footprint. Market indicators project the renewable energy share to reach around 19,3% of total energy consumption by 2029. If South Africa expects to fully transition to sustainable energy by 2050, solar plants will need play a far larger role in the energy mix in the future. For now private industry remains largely dependent on purchased electricity generated from fossil fuels.

The transition to alternative fuels and propulsion systems for fishing vessels has been the subject of research for some years. The main regulatory institution for the shipping industry is the International Maritime Organisation ("IMO"). IMO's international convention MARPOL (International Convention for the Prevention of Pollution from Ships) aims at preventing pollution of the marine environment due to operational or accidental causes. The convention sets limits on emissions and there are various options that can be considered for conforming to these limits, none of which are without their challenges. The measures include switching fuel types, installing exhaust gas treatment systems or exhaust reticulation, consuming less fuel, dual fuel engines, and hybrid propulsion. At I&J a switch from blended fuel started in 2019 and all vessels are now on low sulphur diesel with a sulphur level below 50ppm. This change has ensured compliance with the IMO regulations. The change to low sulphur diesel has also done away with the need to install exhaust scrubber systems. Fuel reduction projects have been implemented over the past four years at I&J, with a reduction to date of 7% in total fuel usage. Alternative fuels, dual fuel engines, and hybrid propulsion can all be considered on new vessel builds only as the retrofit to existing vessels would be far too expensive and time-consuming.

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. The ISO 14001 environmental 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. During F25 Indigo Brands completed an ISO 45001 and 14001 baseline assessment to align policies and procedures to the standard for potential future certification.
- 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;
- Energy efficiency improvements of the refrigeration system at I&J Woodstock and server rooms:
- 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 in accordance with health and safety regulations;
- Upgrading of the air compressors to include variable speed drive and heat recovery functionality in order to provide warm water for ancillary processes; and
- Conversion to energy-efficient, lithium-ion pallet trucks.

### Some F25 energy initiatives included:

- The replacement of fourteen aged airconditioners at Indigo Brands with energy efficient, inverter air-conditioners;
- Evaluation of the replacement at the Westmead Biscuit factory of old and inefficient air compressors with energy efficient units housed in a purpose-built compressor room following the successful project at the Durban Tea factory completed in F25;
- Improved production planning of energy heavy processing steps at the Isando Coffee & Creamer factory:
- The fitting of compressors at the I&J Value Added Processing factory with energy efficient motors and variable speed drives;
- Replacement of refrigeration piping at the I&J Value Added Processing factory; and
- Transfer of the compressor from Auckland Cold Storage, following the closure of the site, to I&J Woodstock to replace the previous high stage compressor.

### Plans for F26 include:

- An investigation into the feasibility of a solar photovoltaic system at I&J's Aquaculture site to reduce reliance on municipal and generator produced power;
- Replacement of an old and inefficient compressed air-dryer at Indigo Brands;
- Replacement of old and inefficient air compressors at the Isando Coffee & Creamer factory with energy efficient units, which is expected to be completed during F26; and
- Various further projects at the Coffee & Creamer factory to improve the steam condensate return and thus reduce the use of water and coal.
- 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, back-up tanks for storing water, recycling condensate produced during the heating processes back to the boilers, recycling production effluent with a view to reclaiming wastewater, installing a desalination processing plant at I&J, and adopting environmentally friendly storm water reticulation, whilst simultaneously measuring and managing water consumption.
- 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 all material handling equipment from diesel 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 F25 the distribution centres continued the outsourcing of the finished goods shuttling operation to contracted specialist performancebased standards vehicles. These vehicles have a 16% increase in carrying capacity, which resulted in an approximate annual distance reduction of 51 765 kilometres and 90 tonnes of carbon emissions for the year. The distribution operations continue investigating the financial and operational suitability of electric and/or hybrid vehicles. Hybrid vehicles have only recently been introduced into South Africa and are still in the testing phase. This option will be reviewed annually to determine whether it becomes financially and operationally suitable. Electric vehicles are currently available but they take approximately eight to nine hours to recharge and mileage on one charge is about 250 – 300 kilometres, depending on the loaded weight and topography. There has also been a slow rollout of electric vehicles in South Africa owing to electricity supply problems. For now, electric vehicles are not a suitable option for the Company's delivery network because of the short range and long recharge times.
  - I&J has been able to improve the fuel efficiency of its fishing fleet by 7% 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, which improvements were sustained through F25. Diesel usage to run back-up generators has significantly reduced during F25 owing to lower levels 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 & Creamer factory. The effluent treatment plant at the Rosslyn Snacks factory was previously 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;
- A project for improvement of the separation and correction of sewer, storm, and effluent drainage and pipelines at the Isando Biscuits factory, which started in the second half of F25 and is nearing completion;
- I&J routinely recycles metal, corrugated cartons, used sunflower oil, and used marine oil;
- 1&J has installed a Vacuum Filter System for recycling of used hydraulic oil from winch systems on the vessels;
- 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;
- Indigo Brands has reduced COD (chemical oxygen demand) levels from the aerosol plant by improving the manual removal of residual product from the CIP (clean-in-place) discharge. An installation to automate the separation and recovery of the residual product in return lines from the CIP discharge prior to the initiation of the CIP cycles, will be implemented in F26;
- Indigo Brands removed further excess plastic packaging from its personal care range through the standardisation of a new roll-on format across the Lenthéric and Yardley female range;
- 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; and

- The majority of Spitz shipments are transported by sea in order to minimise the use of CO<sub>2</sub> intensive air freight.
- Chemicals Spitz manufacturers are required to adhere to the requirements of REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) under the auspices of the European Chemicals Agency regarding the acceptable limits to chemical substances in products. Compliance is monitored and guaranteed by constant testing conducted by accredited, independent inspections and research institutions. Furthermore, manufacturers are constantly working on ways to reduce the use of volatile organic compounds in footwear and apparel, such as by using water-based adhesive systems.
- 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 implemented throughout the Group include:
  - The containment of hazardous waste levels, increased recycling, and reduced waste to landfill by Indigo Brands, coupled with other initiatives designed to further reduce waste to landfill;
  - 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 brickmaking;
  - 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 and Organic certified products.
- 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-and-burn 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 replacement of the barcode and date code printing solutions with a new technology that eliminates the need for paper labels and glue was completed.
- 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 upcycled, 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, whilst 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 environmental NPOs, recyclers of packaging waste, waste management companies, and raw material suppliers, such as the paper

Since the inception of the regulations and establishment of the PROs, the PROs have been instrumental in driving sustainable practices and environmental responsibility within the packaging industry. Organisations such as Fibre Circle, Polyco, and Metpac have implemented various

initiatives to promote recycling and reduce the environmental impact of packaging materials. These include awareness campaigns, collaborations with stakeholders, research, and development to explore innovative recycling technologies and processes, setting up of collection and recycling infrastructure, education and training, and consumer incentive programmes. Unfortunately, the DFFE reports that less than 2 000 companies have registered and are compliant with EPR regulations. The Group companies ensure that they are compliant 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 2025, based on declared volumes, the levies due amount to R1.2 million. It was reported in F24 that there was a reduction in the amount of EPR levies from R2,5 million in F23 to R162 790,00 in F24 as the result of a change in declared volumes to Polyco who had indicated that it would recover the levies directly from the packaging suppliers. These levies were not recovered from the packaging suppliers as planned and the amount due to Polyco in respect thereof was R4,4 million, which was also paid to Polyco in F25.

- 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 Group's marketing and procurement teams will use the Packaging Guideline 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. Whilst 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, 100% of the Company's paperboard spend is with FSC-certified suppliers. 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 making use of post-consumer recycled polypropylene across black aerosol and roll-on caps. Added to this is the new development of suitable white polymer grades for potential use in body lotion and roll-on bottles, which is currently under development.
- During F25 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., biopolymers, 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:

Table 1: Paper packaging

	Cart	ons	Corru	gates	Filter	paper	Total	l F25	Tota	F24
Category	Annual	% of								
	tonnage	annual								
FSC 100%	3 217	38	_	_	_	_	3 217	15	4 148	19
FSC mix/recycled	5 103	61	11 712	100	751	100	17 567	84	17 949	81
Non-FSC/non-compliant	106	1	_	_	_	_	106	1	_	_
Total	8 426		11 712		751		20 890		22 097	
% of total tonnage of all										
paper packaging	40		56		4		100			

**Table 2: Plastics packaging** 

		Material component						
Catagory		Contains recycled Contains zero material recycled material			Total F25 Tota		F24	
Category	Annual tonnage	% of annual	Annual tonnage		Annual tonnage	% of annual	Annual tonnage	% of annual
Recyclable	216	98	1 491	46	1 707	50	1 634	30
Potentially recyclable	5	2	1 732	54	1 737	50	3 750	70
Compostable/bio-degradable	_	_	_	_	_	-	_	_
Non-recyclable	_	_	3	_	3	_	6	_
Total	221		3 226		3 447		5 390	
% of total tonnage all plastics	6		94		100			

- 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 small number 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, whilst at the same time ensuring that such practices are economically sound. All footwear and clothing manufacturers are required to monitor their environmental indicators and to report on these to Spitz.

In an effort to combat "fast fashion" and its impact on the environment (including products to landfill and the carbon footprint of footwear and clothing manufacturing and logistics) Spitz is committed to:

- Creating and selling high quality products using quality materials with quality construction. These products last longer and reduce the amount of clothing waste that ends up in landfills;
- Designing products to be timeless rather than just catering to current trends;
- Designing products with its consumers in mind

- thus hopefully reducing the risk of unwanted goods;
- Producing quantities against carefully calculated projections to avoid overproduction;
- Packing all products into recyclable and reusable paper and board;
- Repacking items that may be received from suppliers in plastic polybags into recycled and reusable paper and board before being sent to the stores, with responsible recycling of such plastic materials by an authorised waste recycling service provider.

There is a proliferation of factories in Italy, which have been identified as having unethical practices, including worker exploitation. Various luxury brands have been named by the Italian Courts for having "culpably failed" to oversee their suppliers. Spitz has taken steps to ensure that all of its Italian suppliers comply strictly to the regulatory requirements for the "Made in Italy" claim and, where a part of the process is allowed to be executed outside of Italy, it uses suppliers in Tunisia and Romania. Italian national and regional government inspectors regularly check compliance, and the Spitz Florence office is required to engage with the factories on a daily basis.

The tannery in Italy from which Spitz's footwear manufacturers derive their leather, carries the prestigious Leather Working Group ("LWG") silver certification, whilst the tannery in Asia carries the LWG gold certification and GICG 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; and
- Improved working conditions and fair treatment of workers

All of the textile manufacturers in turn hold one or more of the following certifications: Global Organic Textile Standard, Organic Content Standard, Global Recycled Standard, Recycled Claim Standard ("RCS"), European Flax Certification, and/or Better Cotton Initiative.

The packaging manufacturers in South Africa all hold one or more of the following certifications: FSC Chain of Custody (Forest Stewardship Council), RCS, ISO 9001 and ISO 14001, and Fibre Circle accreditation. The shoe box manufacturer in China is still in the process of acquiring required certifications.

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.

### Supply chain

The AVI supplier code is communicated to all Group suppliers and service providers and incorporated into all legal agreements. The supplier code imposes on suppliers and service providers an obligation to:

- Comply with all applicable laws relating to the environment in respect of their own operations, including, but not limited to –
  - Taking positive action to eliminate and/or minimise environmental pollution;
  - Complying with waste reduction and recycling legislation;
  - Obtaining and maintaining all required environmental permits;
  - Identifying all chemicals and other hazardous materials and managing them to ensure safe handling, movement, storage, recycling, reuse, or disposal thereof;
  - Monitoring, controlling, treating, and either eliminating or minimising wastewater, solid waste, and air emissions; and
  - Complying with all product content legislation.
- Assess, monitor and either eliminate or minimise the impacts that their businesses have on local communities and strive to have a positive impact on such communities.

The supplier code also specifically requires compliance with all applicable labour and employment laws, or relevant international standards and/or conventions, relating to, inter alia, freedom of association and collective bargaining, compensation and working hours, prohibition of child labour, and prohibition of forced and compulsory labour.

The procurement teams of the subsidiaries are responsible for assessing and monitoring the performance of suppliers against their obligations in terms of the supplier code as well as any substantive supply agreements in place.

As far as operational obligations are concerned, suppliers are monitored based on On-Time, In-Full deliveries, and Quality service levels. Commercial discussions are held on an on-going basis and specifically when pricing is renegotiated or requests for proposals are issued. Quality performance is monitored through non-conformance reporting on either incoming checks or in-process problem identification. Suppliers with repeat quality nonconformances are audited, regardless of whether they have recognised certifications or not. National Brands and I&J pay particular attention to the food safety practices of their suppliers. They are all required to have a valid Global Food Safety Initiative certification. Suppliers without certifications and suppliers with SABS certification (which is no longer accepted by the businesses) are independently audited. If suppliers have unfavourable findings, they are audited annually and are required to close out all findings within two weeks of the audit and provide a corrective action plan. Quality assurance programmes are also in place to audit supplier performance based on paper supplier quality audits and physical site audits.

The businesses monitor social compliance either through initiatives such as the Amfori Business Social Compliance Initiative ("BSCI") social compliance questionnaire that aims to monitor and assess workplace standards across the global supply chain, or a vigorous on-boarding process. The BSCI code of behaviour addresses compliance with practices that represent a commitment to ethical and responsible conduct including, not only, product-related practices but also social responsibility, environmental sustainability, employment practices, and fair competition.

Spitz's suppliers in the European Union are not only subject to quality assurance audits but also to external audits by organisations such as Sedex Members Ethical Trade Audit ("SMETA"), which audits encompass labour standards, health and safety, environment, and business ethics. For those products and/or components manufactured or supplied outside the European Union, Spitz closely monitors industry compliance. 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.

On-going verifications are also done in respect of matters such as membership of relevant PROs, payment of EPR fees, and relevant certifications. The businesses also engage with suppliers through various industry bodies.

Suppliers who are non-compliant with, or at risk of being non-compliant with, the supplier code or

required standards or certifications, are required to take remedial steps without delay. Failure to do so can result in termination of supply agreements.

#### Contraventions

No 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 responsibility

- When considering consumer interests, the Company
  has reference to the OECD Guidelines, which
  provide that "(w)hen dealing with consumers,
  enterprises should act in accordance with fair
  business, marketing, and advertising practices and
  should take all reasonable steps to ensure the
  quality and reliability of the goods and services that
  they provide". The Company also considers the
  social impact of its products.
- As reported in detail below (under the section on manufacturing certifications and accreditations on page 71 of this report), the Company's manufacturing and fishing divisions all maintain relevant health, safety, and quality certifications and accreditations.
- The Company's central marketing and 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.
- All products manufactured by the Company:
  - Comply with all legally required manufacturing and safety standards;
  - Comply with and meet all legally required standards for product testing and research;
- Comply with and meet all legally required standards for consumer health and safety, including those pertaining to nutritional information, health warnings, and safety information which enable consumers to make informed product decisions;
- Contain instructions for storage and use;
- Contain information on product traceability, which enables the Company to trace all manufacturing processes from procurement of raw materials to production, consumption, and disposal to clarify when and where the product was produced; and
- Meet all legally required standards for advertising, including the agreed voluntary code of advertising practice published by the Advertising Regulatory Board ("ARB"). In particular AVI commits to using marketing and advertising that respects and supports children's rights.

- The Company:
  - Does not make product representations or omissions, or engage in any other practices, which are deceptive, misleading, fraudulent, or unfair, and co-operates with all relevant authorities (including the Department of Health, DALRRD, and the ARB) in the prevention and combating of deceptive marketing practices;
  - Is a member of the Consumer Goods Council of South Africa ("CGCSA") and the Consumer Goods and Services Ombud ("CGSO") division and subscribes to the Consumer Goods and Services Industry Code of Conduct. The CGSO mediates and resolves complaints lodged by consumers against businesses operating in the consumer goods and services sector. Consumers are required to first try and resolve the complaint with the business. If they are unsuccessful then the CGSO will assess the matter and, where appropriate, mediate with the business on behalf of the consumer with the aim of reaching an equitable outcome that is fair to all parties;
  - Has internal consumer complaints-handling processes that enable consumers to raise their concerns and complaints with the businesses with a view to resolving them in an equitable manner. The consumer complaints-handling processes include dedicated consumer complaints call centres, which can be accessed telephonically or by e-mail, and which are resourced by well-trained consumer care consultants. Complaints are escalated, where necessary, to senior executives tasked with assessing and resolving such complaints. Contact details for consumer complaints are provided on all product packaging;
  - Complies with the provisions of the Consumer Protection Act, 68 of 2008;
  - Engages on consumer education initiatives through the CGCSA; and
  - Complies with the provisions of the Protection of Personal Information Act, 4 of 2013, in protecting the security of personal consumer data.
- 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.
- The Company recognises the social responsibility attached to its products and recognises that health- and nutrition-related problems may result from people's diets. The Company recognises its responsibility in this context and is committed to contributing to the reduction of health- and nutrition-related problems by active research and development on its food products, with a view to targeting meaningful and achievable quantitative targets for the sugar, calorie, salt, and additive content of its products. The Company is fully compliant with all current legislative requirements pertaining to these content levels.

- There were no reported incidents of noncompliance with regulations and/or voluntary codes concerning the health and safety impacts of products within the reporting period, and the Company has not identified any such noncompliances.
- The Company works closely with relevant industry and government bodies, such as the Consumer Goods Council, Business Unity South Africa, the ARB, the Department of Health, the Department of Trade and Industry, the National Regulator for Compulsory Specifications, the DFFE, DALRRD, the Aerosol Manufacturers' Association, and the Cosmetic Toiletry and Fragrance Association, to contribute to the development of sensible and sustainable consumer legislation and regulations.
- Where relevant to the Company's business, the Group reviews draft legislation and provides input either directly to either the relevant government department, or the relevant industry body, or to the Consumer Goods Council of South Africa, which consolidates industry feedback and responds to the relevant government department.
- All suppliers and service providers to the Company are obliged, in terms of the supplier code, to deliver products and provide services that meet safety and quality standards required by applicable laws and the Company's quality standards. All suppliers supplying goods to the Company must be capable of disclosing, on request by the Company, all sources of primary origin associated with such goods.
- 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.

#### Image caption:

4. Leap Science School – AVI sponsored students during choir performance as part of cultural activities



### 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, including cyber security risks. 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

### 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

#### Comments

- 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, Indian and Coloured ("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 to develop in-house talent

# A 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 emergence of a "two-tiered" economy has increased the risk and incidence of counterfeit and sub-standard products with limited capability by authorities to police and prosecute
- 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

#### Key risks and impact Comments Reliance on third-party brands and diminished • Most of the Company's core brands are owned profitability if licenses are not renewed Key third party brands that the Company has access to are the Lacoste, Gant, and Eden Park brands in the footwear and apparel business and the Lavazza brand in Entyce Beverages. Whilst we have a long history of strong and successful relationships with 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 Inability to sustain and grow profit margins Top line growth is a continual focus area for all of our In a volume constrained environment this will lead businesses and brings with it the opportunity to to decline in profit and return on capital employed leverage fixed costs and expand profit margins Following a period of material costs escalations a Many of the Company's Key Value Items ("KVI's") enjoy a brand premium because of their long legacy of softening in some commodity prices has been seen but cost pressures persist and consumers remain delivery and quality. We seek to preserve this premium through retention of product intrinsics and high focus under pressure, negatively impacting volumes. The ability to keep subsidising margins through cost on product provenance and quality management and improved efficiency, diminishes A failure to invest in manufacturing capacity and/or over time 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. At I&J this is coupled with a reduction in catch rates which materially impacts on the cost per kilogram

of fish caught

• Over-reliance on the strength of core brands could lead

 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

to the retardation of key disciplines

### Key risks and impact

# Deteriorating social, political and operating environment

- Diminished capability of government departments (including policing) 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
- Regulatory hurdles that impact on the Company's ability to implement mitigating measures to address local government's failure to perform their duties in terms of relevant legislation
- Increasingly inflexible labour legislation, including in particular the changes effected to the Labour Relations Act, 1995 ("LRA") 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
- Increasingly onerous changes to the Broad-Based Black Economic Empowerment Act and Codes, and the Employment Equity Act
- 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, product naming, 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 Product Standards Act

#### Comments

- Delays and the constant need for appeals in the Fishing Rights Application Process prolong uncertainty and delay long term investment decisions
- Complex processes to apply for water use licenses and borehole installations to mitigate the impact of the failing water infrastructure throughout the country create extended delays in these processes, which frequently result in refusals for arbitrary reasons and necessitate the taking of formal legal action
- 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 negatively impacted scorecard ratings and made achieving the historical rating levels difficult
- Changes to the Employment Equity Act to impose employment equity targets could potentially result in non-compliance owing to a dire skills shortage
- The failure by outsourced parties to perform their duties in terms of the Agricultural Product Standards Act has resulted in the termination of their contracts and resumption of these duties by DALRRD, who have, in turn, failed to carry out these inspections
- Different product regulations across a multitude of countries are increasingly complicating product labelling and the ability to export to these countries, particularly African countries where there are no coordinated actions to standardise regulations

#### 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
- There has been increased regulation and levies relating to waste recycling and enforcement of measures to incorporate informal "waste pickers" into the formal recycling industry

### 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. Climate-related risks:

а	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:	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 replacemen cycles or with the prospect of reasonable return on investment
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:	• 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
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, as well as the Illovo and Bryanston offices, 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 • The Group's activities relating to climate change will develop and mature to keep capacity to respond pace with the environment in which we operate. This will include changes in legislative and reporting requirements, as well as consumer preferences and manage the risks and opportunities relating to climate change: 3. Financial impacts: a. The direct costs of meeting legislative changes are likely to be material over time. AVI's annual carbon tax is approximately R2,6 million per year at current rates 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 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 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.

Image caption:

5. Leap Science School – AVI sponsored students' live orientation discussions

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	2025 %	2024 %	2023 %	2022	2021
Ownership	75,05	72,96	71,98	67,88	64,22
Management Control	38,81	39,10	42,56	41,25	40,10
Skills Development (including Bonus Points)	74,10	69,02	62,25	66,73	60,13
Enterprise and Supplier Development					
(including Bonus Points)	79,33	83,68	82,30	85,56	87,87
Socio-Economic Development	100	100	100	100	100

### EMPOWERLOGIC Broad Based Black Economic Empowerment Verification Certificate

AVI Limited and Subsidiaries

Level 5 Contribu	

	Measured Entity
Company Name	AVI Limited and Subsidiaries
Registration Number	1994/017201/06
VAT Number	Refer to second page
Address	2 Harries Road
	Illovo, Johannesburg
	2108

D-DDEE Status							
B-BBEE Status Level	Level 5						
Total Points Obtained	79.27	EO: 18.76 points; MC: 7.37 points;	SD: 14.82 po	ints; ESD: 33.32 points; SED: 5 point	5		
Discounting Principle Applied	No	Procurement Recognition	80.00%	Empowering Supplier	Yes		
Black Ownership	17.54%	Black Designated Groups	1.40%	61% Black Owned	No		
Black Women Ownership	9.71%	Black Youth	1.40%	30% Black Women Owned	No		
Black New Entrants	1.27%	Black Disabled	0.00%	Participated in Y.E.S Initiative	No		
Normal Flow Through Applied	Yes	Black Unemployed	0.00%	Achieve Y.E.S Target and 2.5% Absorption	No		
Modified Flow Through Applied	No	Black People Living in Rural Areas	0.00%	Achieve 1.5 x Y.E.3 Target and 5% Absorption	No		
Mandated Investment Exclusion Applied	No	Black Military Veterans	0.00%	Achieve Double x Y.E.8 Target and 5% Absorption	No		
				Measurement Period Year End	30/06/2025		

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#### Ownership

The Company achieved an ownership score of 75.05% 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 benefitted 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 schemes that have been implemented deliver value against I&J share price appreciation and are an integral part of I&J's compliance for the allocation of long-term fishing rights.

AVI and I&J HoldCo are fully committed to transformation in South Africa and, in addition to the Black staff scheme, 18,75% of I&J Limited is held by Twincitiesworld (Pty) Ltd, a 100% Black-owned company.

In total, 25% of the issued share capital of I&J Limited is directly 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.

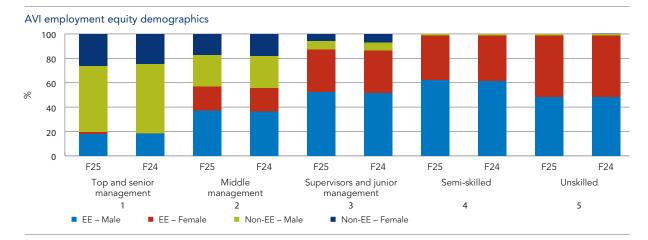
### Management control

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

The Company achieved a combined management control score of 38,81%. The score for Board Participation and Other Executive Management was 28,54% and the score for Employment Equity was 56,42%.

Management control remains an area of heightened focus for the Company. The Board Participation and Other Executive Management 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 R145,0 million, equivalent to 4,76% of the 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. 4 555 employees, or 54,61% of the total workforce (including permanent and fixed term contract employees), were trained during the year, 96,14% of whom were Black. Of the total Black employees trained 43,37% were Black females. The total spend for Black males was R53,28 million and for Black females was R38,54 million. The Company budgets annually to spend approximately 2% of the leviable amount on skills development initiatives.

The Company achieved a score of 74,10% (including Bonus Points) and met the required 40% threshold.

All employees in the C, D, E and F bands undergo annual performance reviews and goal setting for the year ahead. Employees rated as high performers or possessing scarce skills will be identified and development activities will be undertaken linked to future business needs and retention. Individual training plans will be developed as appropriate. Employees rated as under-performers will be performance managed with a view to improving their performance or exiting them from the business.

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 Education Training Authority ("TETA"), and the Chemical Industries Education Training Authority ("CHIETA"), which enabled the Company to receive mandatory grant payments of R5,67 million and discretionary grant payments of R2,40 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 523 learners (the majority of whom were Black) on such programmes.

Learnership programmes, occupational qualifications, and apprenticeships remain a priority throughout the Group.

In the past year National Brands supported 337 learners of whom 70 were unemployed disabled persons on key programmes, including End-User Computing Level 3. National Brands continued supporting 36 apprentices on critical and scarce trades courses. 24 employees remained on NQF Level 8 Business Leadership programmes and a further 16 employees on a Level 5 Management qualification with the DaVinci Business School.

I&J has made substantial investments in training unemployed youth for the fishing and broader maritime industry. I&J recognises the critical need to empower the younger generation by providing them with the skills and opportunities necessary to thrive in the fishing and maritime sectors. These initiatives reflect I&J's commitments to social responsibility and align with their strategic goals to support community development and sustainable industry growth. I&J also participates in the Youth Employment Service (YES programme) initiated by government in F20 in terms of the BBBEE Act and aimed at youth employment. In F25 I&J registered a further group of 49 unemployed youths on 12-month youth employment contracts, thereby giving them their first opportunity at employment. Over the past year I&J made a substantial investment in the formal training and development of 104 people (of whom 54 are disabled) on programmes including NQF4 Leadership Development, and NQF3 End User Computing (for learners with disabilities), NQF3 Production Technology, as well as Apprenticeship programmes for both employed and unemployed individuals.

Indigo Brands trained 23 learners, focusing on NQF5 Supply Chain Management and NQF3 End User Computing, and invested in unemployed Disabled Learnerships. In addition, selected employees have been assigned to the Formulation Laboratory and enrolled in Cosmetics Science training with a view to developing cosmetic chemistry capabilities.

Spitz successfully enrolled 30 people on the NQF5 Retail Chain Store Manager programme with IMM. In addition, 26 store managers participated in the NQF4 General Management programme. 20 unemployed, disabled learners were enrolled on an NQF3 Generic Management programme. Spitz bursaries are funding 8 employees' higher education studies.

Ciro enrolled 20 disabled people on the NQF3 End User Computing programme, and a further 25 employees on NQF4 and NQF5 Generic Management programmes, a Contact Centre Support programme, and OCTO Occupational Certificates in Sales Assistant and Sales Representative.

Since the inception of the AVI Graduate Programme in F16, 134 students have had various opportunities within the Group. There are currently 13 graduates enrolled in the final year of the 24-month programme, being the final intake The AVI graduate programme has served the Group well since 2016, providing a pipeline for scarce skills, in particular engineering. Given various rationalisation projects underway it was becoming increasingly challenging to place graduates within the businesses after completion of the programme. A decision was therefore taken at the end of 2024 to run out the programme until the end of 2025, whereafter it would be discontinued.

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. There are currently over 129 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 continues identifying and developing other appropriate online training programmes, including most recently Health and Safety Induction, Access Control and Food Safety, Disciplinary Guidelines, Mystery Shopper (for Spitz), and Product Knowledge for Ciro, with a further 17 courses in the development stage.

All training programmes are evaluated from time to time for relevance and results and changes made, as necessary. Individual employees on training programmes are carefully monitored and assisted, as necessary, throughout the programme to ensure optimal results and the Company continues to benefit from the holistic view of our talent and succession strategies across and within our businesses.

## Preferential procurement, enterprise and supplier development

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

The Transformation 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 79,33%. The Company met the 40% threshold in all three elements, namely preferential

procurement (86,63%), supplier development (49,26%), and enterprise development (100%).

The Transformation team works 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").
- 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 Kaya Café (Pty) Ltd and Focus Facilities Solutions (Pty) Ltd, 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.
- 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 to empower them to improve their BBBEE scores.

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 localisation plans are currently in progress:

- The plan for local procurement of specialised paper wax liners (mince block packaging) for I&J, which are imported from Denmark, China, and the United Kingdom, is in the final stages of product trials.
- Indigo has identified a project for local manufacture of roll-on balls to replace the products being sourced from China.
- A supplier development project for a Procurement
  e-Catalogue that allows buyers to procure low value,
  high volume products experienced some delays but
  has progressed well through F25 and is currently
  being rolled out, starting with National Brands. This
  will enable suppliers, particularly small and mediumsized enterprises, to gain low-cost access to
  purchasers such as the Company.

#### Currently -

- 97% of local supplier spend is BBBEE compliant.
- 8% of the local procurement spend is with EMEs and QSEs.
- 61% of the local procurement spend is with Blackowned vendors.
- 53% 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 supplier code. 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.

### Image caption:

6. Ruth First Jeppe Girls – AVI sponsored students

In March 2025, the Department of Trade, Industry, and Competition ("DTIC") published the Draft Transformation Fund Concept Document detailing a plan to redirect funds from companies' enterprise and supplier development spend to a central fund managed by the DTIC to empower majority black-owned businesses. It is not yet clear how the amounts payable would be calculated and which elements of the scorecard would be affected, i.e. one or both of enterprise and supplier development. The Company will continue monitoring progress on this proposal.

### 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 on a full-time basis 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 routinely monitored by the trustees and the full-time trust administrators to ensure that they achieve what was initially intended. All beneficiaries are also required to report to the trust at least once a year on the socio-economic activities undertaken by them and how the grant was spent. 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, R32,9 million was available to the Company's CSI programmes. Of this amount R31,1 million was distributed as direct financial contributions to beneficiaries. In addition, the Company incurred R2,8 million in overhead and administration costs.

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

- The Supplementary Education Trust exposes learners from grades 10 to 12 to high-quality educational materials and 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. These programmes include learners from impoverished homes and underperforming schools in areas such as Umlazi, Inanda, Kwa-Mashu, Claremont, Mabopane, and other low-income communities.
- 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 Kliptown Youth Programme has been supported by the Trust 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

### Image captions:

- 7. The Carel du Toit Centre
- 8. Kingsway Christian School
- 9. Just Grace Qhubeka Youth Development Programme
- 10. Whale Coast Conservation









- children to take to school and offers a free afterschool 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 15 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 2025, supported another 23 students.
- The Learn to Earn foundation trains students in Basic Computer Skills, Office Administration, Sewing, Hospitality, Baking, Barista, and Shop Assistant 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.
- Kingsway Centre of Concern operates the Kingsway School and the Thandanani House of Refuge. The school has 13 teachers and caters for approximately 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 Theo Jackson Jeppe Trust provides scholarships for boys from disadvantaged backgrounds at Jeppe High School for Boys. The Company currently sponsors 6 boys in different grades. The sponsorship covers the full cost of tuition, boarding, study materials, and extra-curricular 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 courses 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 club.
- Love Trust grows leaders and delivers excellent, values-based education to early childhood development teachers and, through the Nokuphila School in Midrand, to approximately 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 9 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 on-going 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, workplacebased 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 6-month work readiness programme is included towards the end of the practical workplacebased training in order to prepare the apprentice for the world of work. The Company is supporting 10 learners who are in their first 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. Since 2022 the Company has 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 supported 2 students to complete their 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. The Company funding has contributed not only towards the operational needs of the programme but also the acquisition of much-needed equipment and the establishment of a facilitators programme for 10 of the volunteers to better equip them with accredited skills in Business Administration and New Venture

- Sparrow Schools Educational Trust strives to provide disadvantaged children with cognitive barriers access to quality and accredited learning through the use of the Phono-Graphix programme. The programme gives teachers and learners the tools they need to open the door to literacy and has proven effective in addressing reading problems at any age or ability level
- Read to Rise started in 2013 and is committed to promoting literacy in schools in under-resourced communities. The philosophy of the programme is that children need to read in order to rise in their personal development and contribution to society. The Company supports the delivery of this programme across schools in Soweto, Johannesburg, and Mitchells Plain.
- The Good Shepherd Primary School is a no-fee public school on private property in Makhanda (formerly Grahamstown) in the Eastern Cape. 315 learners from the surrounding low-income communities are currently enrolled from Grade R to Grade 7. In F25 the Company contributed towards the reconfiguration and renovation of their computer laboratory.
- Siyabonga Africa has been operating for 38 years and provides skills training for unemployed persons in baking, information technology, early childhood development, welding, and fashion, and provides business support for start-ups as well as food security in the form of food vouchers and food gardens. The Company supported the welding programme for 10 unemployed learners.
- Baby Line supports vulnerable mothers by providing counselling, guidance, and safe alternatives for those struggling to care for their babies. It not only addresses immediate physical needs but connects mothers with local organisations, community members, and support networks that can provide long-term care and resources. The Company's contribution assisted with care packs to new mothers in Gauteng.

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 is aimed at teaching children how to recognise and react appropriately to threats posed by open bodies of water and to assist in helping those in a potential life-threatening situation. The Programme is a practical approach to drowning prevention using a

- host of basic swimming principles to increase the chances of survival and the Company supports this programme across schools in the Western Cape, Gauteng, and KwaZulu-Natal.
- The Red Cross Children's Hospital (The Children's Hospital Trust), 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 burn's 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 contributed towards the on-going construction of the new state-of-the-art Orthopaedic Unit, which will provide specialised services and care during a single visit to the hospital, thus removing some of the burden of travel time and costs from caregivers, and the acquisition of a state-of-the-art echocardiography machine for paediatric heart patients. I&J is proud to have a named space allocated in the waiting room of the Orthopaedic Ward of the Hospital.
- The KZN Children's Hospital Trust established in 2011 to work in a public-private partnership with the KwaZulu-Natal Department of Health to renovate and re-establish services. This goes hand in hand with the restoration of the historical structures within the hospital precinct and the construction of a new 7-storey building. The Company has previously provided support for this programme and in F25 contributed a further amount towards the Child and Adolescent In-Patient Psychiatric 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.
- 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 supported the Enactus teams at the Tsolo Agriculture and Rural Development Institute, Sol Plaatjie University, University of the Free State, and University of Zululand.
- 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.
- 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 KwaZulu-Natal and provides meals to over 60 establishments. The Company continues contributing towards these activities in KwaZulu-Natal.
- O Graceland and the Menstruation Foundation who together are working towards ending period poverty through the provision of free, locally made, ecofriendly pads and the installation of pad vending machines. To date, the Company has sponsored the installation and monthly restocking of 8 sanitary pad dispensing machines at high schools in KwaZulu-Natal, Gauteng, and the Western Cape.
- One Voice South Africa is a small organisation with a big vision of a world where young people can actively engage with meaningful opportunities for personal development and raise their voices to bring about a healthier future for themselves and their communities. The Company's contributions assist with the Life Skills and Enterprise Projects with the new grade 8, 9 and 11 learners in 2 schools.

- 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. 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, whilst at the same time working on programmes to address the underlying issues.
- Gift of the Givers, which is the largest nongovernmental disaster response organisation on the African continent. In F25 the Company contributed towards assisting persons affected by the devastating floods in the Eastern Cape.

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, Seesterretjies ECD Centre, Impande Yotshani, Share the Love, the Coalition of Anglican Children's Homes, Pathways Roodepoort, IThemba Lethu, Coach, Missing Children SA, Embocraft Training Centre Trust, Go for Gold Tuition, Siyabonga Africa, Thomsom Smillie, the Trauma Centre for Women and Children, Abraham Kriel Childcare, Action for the Blind, Buhle Farmers, Owl Rescue Centre, CHOC SA, Chubby Chums, Johannesburg Care Foundation, Christel House, The Peace Agency Baby Home, Operation Hunger, Living through Learning, Prosperous Souls, Manger Care Centre, and Ladies of Hope.

In addition to contributions made to various organisations by the Trust, I&J also contributed just over R2,3 million directly to a number of programmes aimed at the communities in which its employees live and work, such as Service Dining Rooms, Seesterretjies ECD Centre, Eleven Express Football Club The Homestead Project for Street Children, Heideveld Rescue Mission, Lifesaving Cape Town, The Trauma Centre for Survivors of Violence, and SA Harvest.

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 July 2025 employees across the Group participated in various Mandela Day activities, including, employees packing care bags for Baby Line, a visit to KZN Children's Hospital, a school painting initiative at the Love Trust Nokuphila School, a clean-up campaign at Little Eden, as well as participating in the Red Cross Children's Hospital Trust Mandela Day Drive, which involved handing out gifts to the children and generally interacting with them.

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 employees by type of employment (South Africa at 30 June)	2025	2024
Fixed term contract Fixed term contract – in-service trainee Fixed term contract – learnership Permanent	533 0 132 7 676	532 0 174 7 753
Number of employees by type of employment (Namibia, Zambia, and Botswana)		
Fixed term contract Permanent	5 281	6 278

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

Region	Male	Female
Eastern Cape	149	105
Free State	139	67
Gauteng	1 901	1 538
KwaZulu-Natal	890	662
Limpopo	32	38
Mpumalanga	47	43
Northern Cape	6	5
North West	22	23
Western Cape	1 276	935
Namibia, Botswana, and Zambia	236	50

	2025	2024
Number of permanent employees (South Africa at 30 June)*	7 676	7 753
Gender split (%) (including Foreign)		
• Male	57	57
• Female	43	43
Ethnic split (%)		
• African	73	73
• White	5	5
• Indian	4	4
• Coloured	17	17
• Foreign	1	1
Ethnic and gender split (%)		
Black (African, Indian, and Coloured) male	53	53
White male	3	3
Black (African, Indian, and Coloured) female	41	41
White female	2	2
• Foreign	1	1

<sup>\*</sup> This number is measured as at 30 June and may therefore differ from the numbers reported under the skills development section of this report where the numbers are reported as total persons in the employ of the Company throughout F25.

	2025	2024
Number of permanent employees (Namibia, Zambia, and Botswana at 30 June)	281	278
Gender split (%) (including Foreign)		
• Male	84	84
• Female	16	16
Ethnic split (%)		
• African	99	97
• White	0,7	1
• Indian	0	0
• Coloured	0,3	2
• Foreign	_	0,5
Ethnic and gender split (%)		
Black (African, Indian, and Coloured) male	83	83
White male	0,35	0,7
Black (African, Indian and Coloured) female	16,3	16
White female	0,35	0,3
• Foreign	0	0

# Employee Movements - South Africa at 30 June 2025 (including intra-Group transfers and changes in contract from Fixed Term Contract to Permanent and Permanent to Fixed Term Contract)

		Fixed Term Contracts (all types) Total Permanent										
Region		Female		Male		All Fixed Term	Female		Ma	le	Total All	Total Net Movements All
	Age Group	Entry	Exit	Entry	Exit	Contracts	Entry	Exit	Entry	Exit	Permanent	Employees
'	<20	3	2	0	0	1	1	1	0	1	(1)	0
	20 – 40	15	10	21	16	10	10	11	20	20	(1)	9
	41 – 60	0	0	1	1	0	2	5	1	7	(9)	(9)
Free State	<20	0	0	0	0	0	1	0	0	0	1	1
	20 – 40	6	5	9	6	4	5	8	19	29	(13)	(9)
	41 – 60	0	0	0	0	0	2	2	2	4	(2)	(2)
3	<20	5	3	8	8	2	1	0	3	2	2	4
	20 – 40	159	169	157	170	(23)	98	94	129	154	(21)	(44)
	41 – 60	21	16	13	14	4	13	50	20	83	(100)	(96)
	60+	1	3	2	5	(5)	0	2	0	3	(5)	(10)
KwaZulu-Natal	<20	2	0	5	1	6	0	1	1	0	0	6
	20 – 40	51	56	48	49	(6)	34	16	50	51	17	11
	41 – 60	0	2	1	5	(6)	6	12	8	22	(20)	(26)
	60+	0	0	0	2	(2)	0	0	1	3	(2)	(4)
Limpopo	<20	2	2	0	0	0	0	0	0	0	0	0
	20 – 40	11	11	9	7	2	2	9	6	7	(8)	(6)
	41 – 60	0	0	0	0	0	0	1	0	0	(1)	(1)
Mpumalanga	20 – 40	20	20	14	14	0	0	2	5	6	(3)	(3)
	41 – 60	0	0	0	0	0	0	0	0	1	(1)	(1)
Northern Cape	20 – 40	1	1	2	2	0	1	1	0	1	(1)	(1)
North West	20 – 40	3	3	3	3	0	0	1	3	1	1	1
Western Cape	<20	19	16	25	10	18	4	3	1	2	0	18
	20 – 40	193	155	246	117	167	26	62	70	96	(62)	105
	41 – 60	13	12	66	32	35	11	42	16	73	(88)	(53)
	60+	0	2	4	8	(6)	0	0	0	2	(2)	(8)
Grand Total		525	488	634	470	201	217	323	355	568	(319)	(118)

The Company is committed to compliance with all applicable employment and labour laws and regulations in the jurisdictions in which the Company operates, as well as other principles, including the ILO Labour Standards, the OECD Guidelines, and the UN conventions.

### Freedom of association and protection of the right to collective bargaining

Every employee has the right to form, join, and organise trade unions or other organisations of their choice for furthering and defending their interests, and to bargain collectively with the Company as set out more fully in Chapters II and III of the LRA, and as read with the relevant ILO Standards, including those on freedom of association, protection of the right to organise, and collective bargaining. AVI respects these rights and does not interfere with the exercise thereof. Elected employee representatives are not subject to discrimination, harassment, intimidation, or retaliation for reason of their being members of a trade union or participating in trade union activities.

Of the Company's permanent employees, 37,44% 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.

#### **Equal remuneration**

In accordance with ILO convention number 100, equal remuneration refers to "rates of remuneration established without discrimination based, directly or indirectly, on sex". AVI ensures that the application of the principle of equal remuneration for persons of all genders for work of equal value is entrenched in its remuneration practices through the adoption of non-discriminatory benchmarking, job grading, and salary scales.

All employees are remunerated based on either external benchmarking and salary surveys or in accordance with collective wage agreements and/or applicable sectoral determinations, all of which exceed the legislated minimum wages and take account of consumer inflation.

#### Discrimination

The Company does not allow any unfair distinction, exclusion, or preference between employees made on the basis of race, colour, sex, religion, political opinion, national extraction, social origin, or any other ground as set out in, inter alia, the Employment Equity Act, 1998, or the ILO Labour Standards. The Company applies a strict non-discrimination policy, designed to promote equal opportunities and diversity, relating to: recruitment procedures (including advertising, selection and appointments); job classification and grading, remuneration and benefits, terms and conditions of employment; job assignments; work environment and facilities; training and development; performance and evaluation; promotions; transfers; succession and experience planning; disciplinary

measures; dismissals; corporate culture; reasonable accommodations; and HIV/AIDS and other wellness programmes. During the year, no infringements of discrimination were reported.

#### **Employment relationships**

AVI complies with the provisions of the Basic Conditions of Employment Act, 1997 ("BCEA"), and the LRA, relating to ensuring that the employment relationship between AVI and its employees is clearly documented and defined.

The businesses endeavour to ensure that they maintain sustainable permanent workforce levels with a view to providing regular employment, but during peak manufacturing season or fishing season the Company will employ temporary employees in certain capacities. These employees are either provided with written fixed-term contracts of employment, which comply with relevant legislation or collective agreements, and are remunerated according to industry benchmarks (well above the legislated minimum wage) or, in the case of the fishing industry, in accordance with the industry collective agreements.

In addition to permanent and fixed-term contract employees, seasonal workers will be employed through temporary employment service providers and contractors will be employed in terms of substantive agreements with service providers in respect of non-core Group functions such as security, cleaning, and catering. Seasonal workers and contractors will have employment agreements with the relevant 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 supplier code.

When the businesses are contemplating retrenchments based on operational requirements, these are done strictly in accordance with the provisions of the LRA. The process will include a meaningful joint-consensus seeking process to address all of the matters contemplated in the LRA, including, but not limited to, how to avoid or minimise the retrenchments, ways to mitigate the adverse effects, which employees will be retrenched, and the severance pay for retrenched employees.

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.

All employees, whether permanent, part-time, or fixed term, have written contracts of employment, which comply with local legislation. All terminations of employment are done strictly in accordance with relevant legislation. Dismissed employees who dispute the procedural or substantive fairness of their dismissal, have access, at no cost to them, to the Commission for Conciliation, Mediation and Arbitration. No large-scale redundancies or job cuts (affecting more than 1 000 or 5% of employees) were undertaken during the year under review.

#### **Human resources development**

AVI is committed to the development of its employees, details of which are set out more fully throughout this report and, in particular, in the Skills Development section on page 59. AVI complies with its obligations in terms of the Skills Development Act, 1998, and the Skills Development Levies Act, 1999.

#### Remuneration, working hours, and paid leave

Salaries and wages paid to employees meet or exceed legislated minimum standards. Working hours, overtime, shift allowances, salary deductions, and other remuneration and working hours-related matters (including rest periods, paid leave, part-time work, and night work) comply with applicable legislation, including the BCEA, the Income Tax Act, 1962, and relevant Sectoral Determinations, as read with relevant ILO Labour Standards.

All employees are entitled to, at least, the minimum leave benefits as provided for in the BCEA, or the relevant Sectoral Determination, the AVI Group Leave Policy, or an applicable collective bargaining agreement, as the case may be, including, as applicable, annual leave, maternity leave, parental leave, adoption leave, commissioning parental leave, and family responsibility leave. Where appropriate, the Group leave policy also makes provision for ad hoc discretionary leave to be given in extraordinary circumstances or where additional leave is negotiated and agreed on in terms of the collective bargaining

#### **Maternity benefits**

Employees are entitled to the maternity benefits set out in the BCEA, or the AVI Group Leave Policy or an applicable collective bargaining agreement, as the case may be. AVI also complies with its obligations relating to working during maternity leave as set out in the BCEA, and the Code of Good Practice on the Protection of Employees during Pregnancy and After the Birth of a Child.

#### Child labour

In accordance with the recommendations of ILO convention numbers 138 and 182, and the UN Convention on the Rights of the Child, South Africa has defined a "child" in the BCEA, as "a person who is under 18 years of age". AVI complies with all South African laws in respect of the employment of children. AVI respects and supports the rights of all children and endorses the UNICEF Children's Rights and Business Principles.

#### Forced and compulsory labour

Forced labour is defined in the ILO convention number 29 as "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily". All forms of forced labour are absolutely prohibited in AVI.

#### Income security

Membership of a Group retirement fund is compulsory for all permanent employees (including flexitime and part-time permanent employees). There are no permanent employees in any of the countries in which the Company does business, who are not members of a Group retirement fund. Such membership includes life and disability cover, with some of the funds also providing funeral benefits. Fixed-term employees are not eligible to join one of the Group's retirement funds. AVI complies with all statutory obligations in terms of the Unemployment Insurance Act, 2001, and the Unemployment Insurance Contributions Act, 2002.

#### Medical care

Membership of a Group medical scheme is compulsory for all permanent employees within the D, E, and F bands and optional for other permanent employees. Employees in the A, B and C bands who elect not to join the medical scheme, have access to healthcare either through on-site clinics or the public healthcare system. Fixed-term employees are not eligible to join one of the Group's medical schemes. All employees have access to at least paid sick leave in accordance with the BCEA. Where appropriate, the Group leave policy also makes provision for ad hoc discretionary sick leave to be given in extraordinary circumstances or where additional leave is negotiated and agreed on in terms of the collective bargaining structures.

#### **Labour inspections**

AVI understands and accepts the rights of the Department of Labour to undertake labour inspections of its businesses and cooperates fully with labour inspectors.

#### Maritime labour

AVI complies with all applicable laws and regulations relating to maritime labour in South Africa including the Merchant Shipping Act, 1951, and the Marine Living Resources Act, 1998, underpinned by the ILO Maritime Labour Convention, 2006, to which South Africa is a signatory.

#### Compliance

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

Relevant labour and employment-related legislation, which is complied with by the Company, includes but is not limited to the:

- BCEA;
- National Minimum Wage Act, 2018;
- LRA;
- Employment Equity Act, 1998;
- Skills Development Act, 1998;
- Skills Development Levies Act, 1999;
- Compensation for Occupational Injuries and Diseases Act, 1993;
- Unemployment Insurance Act, 2001; and
- Unemployment Insurance Contributions Act, 2002.

The supplier code makes it compulsory for all suppliers and service providers to the Company to comply with all relevant employment and labour laws and regulations in the jurisdictions in which the Company operates.

#### **Human Rights**

The Company believes in, recognises, and supports the inherent dignity, and equal and inalienable rights, of all people.

The Company commits to respecting the rights set out in the Bill of Rights contained in Chapter 2 of the Constitution of the Republic of South Africa, 1996, the United Nations Universal Declaration of Human Rights, the OECD Guidelines, and the ILO Labour Standards, and to ensuring that neither the Company nor its employees are complicit in the violation of human rights.

The Company expects all employees and other stakeholders to understand and support these rights and to take all steps reasonably practicable to ensure that they do not commit and are not complicit in the violation of human rights. During the year, no infringements of any employee's human rights 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 77 disabling injuries. These injuries resulted in 658 lost days for the year, and an achieved DIFR of 0,63 for the year, below the target DIFR of 0,64.

The Company categorises all injuries into one of three classes. Class 1 being damage that permanently alters a person's life or results in a fatality, to class 3 that inconveniences a person's life. During the year under

review there were 2 class 1 injuries or deaths, 6 class 2 injuries, and 69 class 3 injuries. Neither of the 2 class 1 injuries resulted in death. All injuries were 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 an Occupational Therapist conducted assessments to highlight undesirable ergonomic conditions and practices. Reported cases have reduced owing to ergonomic education interventions, equipment modifications and investments, and the rotation of employees in line with the Occupational Therapist's recommendations and there are currently only six active work-related upper limb disorder cases linked to the repetitive nature of roles, particularly amongst packers. Conservative treatment cases are managed through weekly engagements with the Indigo Brands-appointed doctor, Occupational Therapists, Physiotherapists, and Operational Managers, to prevent injuries.

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. Spitz is taking all practical measures to limit the probabilities of, and risks associated with robberies in their retail 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 maintains a close relationship with the AVI Employee Wellness Programme to ensure that affected staff receive counselling after any traumatic event.

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 voluntary counselling and training ("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 Lyra Health 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. Compliance with applicable labour legislation pertaining to working hours, overtime, and leave, ensure employees maintain a healthy work-life balance. Where operationally possible, the businesses implement workplace flexibility, which may include flexible working hours or working from home, as appropriate.

The supplier code makes it compulsory for all suppliers and service providers to the Company to have procedures and systems in place to prevent, manage, track, and report occupational injuries and illnesses; and to provide their employees with access to clean ablution facilities, food preparation areas, storage, clean drinking water, and eating facilities.

#### Manufacturing certifications and accreditations

All of the National Brands manufacturing facilities maintained their Food Safety System Certification ("FSSC") 22000 V5.1, with some of the factories already having been audited according to the new FSSC V6 standard. 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 Value Added Processing sites have Hazard Analysis and Critical Control Points accreditation, which is regulated by the National Regulator for Compulsory Specifications. Both sites also achieved an "A" rating with British Retail Consortium for Global Standards ("BRC") and 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 at the Woodstock factory has SANAS 17025 accreditation. The I&J chicken processing plant is ZA 111 certified (certification by DALRRD 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 BSCI social audit was conducted in June 2024 and achieved favourable results. The BSCI code of conduct and the SMETA audit refer to international conventions such as the Universal Declaration of Human Rights, the UNICEF Children's Rights and Business Principles, the UN Guiding Principles for Business and Human Rights, the OECD Guidelines, the UN Global Compact, and the ILO 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 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, significantly

increasing 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.



# GRI content index of material issues reported for the period 1 July 2024 to 30 June 2025 with reference to the 2021 GRI Standards

(Page references are to the issues to the extent reported and do not fully 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, 124, 125, 138 to 141
<b>2-2 Entities included in the organisation's sustainability reporting:</b> (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 appropriate
<b>2-5 External assurance:</b> (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, 95, 131 to 137
<b>2-6 Activities, value chain, and other business relationships:</b> (a) Sector in which organisation is active (b) Describe the value chain, including: organisations 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	66 to 70
<b>2-8 Workers who are not employees:</b> (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	66 and 68
<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	88 to 96
<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	

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	88 to 96
<b>2-12 Role of the board in overseeing the management of impacts:</b> (a) The role of the board and of senior executives in developing, approving, and updating the organisations 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	88 to 96
<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	88 to 96
<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	88 to 96
<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	88 to 96
<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	88 to 96
<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	88 to 96
<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	88 to 96
<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	68, 99 to 119
<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	99 to 119
<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	99 to 119

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	4 to 9, 32 to 72
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	
<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 to 82
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 to 82
<b>2-26</b> Mechanisms for seeking advice and raising concerns: 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 to 82
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	49 and 50
<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	68

Disclosure	Reference
GRI 201: Economic Performance	
201-1 Direct economic value generated and distributed: (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	41 to 48, 54 to 56
201-3 Defined benefit plan obligations and other retirement plans: (a) If the plans 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 schemes 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	145, 152, 169 and 170
<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	None
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'	Not reported*
<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	
<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	Not reported

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'	60 and 61
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	32, 33, 35 and 36
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	32, 33, 35 and 36
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	
<b>206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices:</b> (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 outcome 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
207-3 Stakeholder engagement and management of concerns related to tax: 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	36

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	121 to 198
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	37 to 49
<b>301-2 Recycled input materials used:</b> Percentage of recycled input materials used to manufacture the organisation's primary products and services	37 to 49
<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	37 to 49
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, watt-hours 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	42
<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	42
<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	42
<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	42
GRI 303: Water and Effluents	
<b>303-1 Interaction with water</b> as a shared resource: (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 runoff) (b) Description of the approach used to identify water-related impacts, including the scope of assessments, their timeframe, 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, 39 and 42

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 to 48
303-3 Water withdrawal: (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 to 48
<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	40 to 48
<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	42
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	37 to 40
<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	37 to 40

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	37 to 40
<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	37 to 40
GRI 305: Emissions	
<b>305-1 Direct (Scope 1) GHG emissions:</b> (a) Gross direct (Scope 1) GHG emissions in metric tonnes of $CO_2$ or equivalent (b) Gases included in the calculation (c) Biogenic $CO_2$ emissions in metric tonnes of $CO_2$ 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	42
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 2), and/or other indirect (Scope 3) (d) Gases included in the calculation	42
<b>305-5 Reduction of GHG emissions:</b> (a) GHG emissions reduced as a direct result of reduction interventions, in metric tonnes of $CO_2$ 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	42
<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
<b>305-7 Nitrogen oxides (NOx), sulphur oxides (SOx), and other significant air emissions:</b> (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	40 to 49
<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	40 to 49
<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	49

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	40 to 49
<b>306-4</b> Waste diverted from disposal: (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	40 to 49
<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	40 to 49
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	60 and 61
<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	60 and 61
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	66 and 67
<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; health care; disability and invalidity coverage; parental leave; retirement provision; stock ownership; others (b) The definition used for 'significant locations of operation'	66 to 71*
<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	66 to 71*

Disclosure	Reference
GRI 403: Occupational Health and Safety	
<b>403-1 Occupational health and safety management system:</b> (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 to 71*
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	70 and 71*
<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	70 and 71*
<b>403-4</b> 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	70 and 71*
<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	70 and 71*
<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	70 and 71*
<b>403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships:</b> 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	70 and 71*
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	70 and 71*

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 minimize risks using the hierarchy of controls (d) Any actions taken or underway to eliminate other work-related hazards and minimize 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	70 and 71*
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 minimize 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	70 and 71*
GRI 404: Training and Education	
<b>404-1</b> Average hours of training per year per employee: Average hours of training that the organisation's employees have undertaken during the reporting period, by: gender; employee category	59 and 60
<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	59 and 60
<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	59 and 60
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</b> Ratio of basic salary and remuneration of women to men: (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

Disclosure	Reference
GRI 407: Freedom of Association and Collective Bargaining	
<b>407-1</b> Operations and suppliers in which the right to freedom of association and collective 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 support rights to exercise freedom of association and collective bargaining	60, 61, 68 to 71*
GRI 408: Child Labour	
<b>408-1 Operations and suppliers at significant risk for incidents of child labour:</b> (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 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	60, 61, 68 to 71*
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 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	60, 61, 68 to 71*
GRI 410: Security Practices	
<b>410-1 Security personnel trained in human rights policies or procedures:</b> (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	68 to 71*
GRI 411: Rights of Indigenous Peoples	
<b>411-1 Incidents of violations involving rights of indigenous people:</b> (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	Not reported*
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	32 to 72
<b>413-2</b> 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	32 to 72
GRI 414: Supplier Social Assessment	
<b>414-1 New suppliers that were screened using social criteria:</b> Percentage of new suppliers that were screened using social criteria	60 and 61

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	60 and 61
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	36
GRI 416: Customer Health and Safety	
416-1 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	49 and 50
416-2 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	49 and 50
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	49 and 50
417-2 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	49 and 50
GRI 418: Customer Privacy	
<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	36

 $<sup>^{\</sup>star} \ \, \text{Comply with local legislation, including but not limited to, labour and employment legislation, collective agreements, consumer,} \\$ product safety, and packaging legislation.