

EITI International Secretariat's Final Assessment

Company progress in meeting the Expectations for EITI supporting companies

Company name	African Rainbow Minerals
Sector	Mining
Headquarters	Johannesburg, South Africa
Type	Public
Date of submission to company (month/year)	June 2023
Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). For information purposes.	
Does the company, directly or through a subsidiary (including joint-ventures) participate in a multi-stakeholder group?	No
If yes, indicate in which countries your company is participating in MSGs?	N/A
Secretariat comment	The Secretariat notes and thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries.
EXPECTATION 1	Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles

EITI International Secretariat

Phone: +47 222 00 800 • E-mail: secretariat@eiti.org • Twitter: @EITlorg • www.eiti.org

Address: Rådhusgata 26, 0151 Oslo, Norway • P.O. Box: Postboks 340 Sentrum, 0101 Oslo, Norway

and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.	
Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes
URL for Statement Support	2022 ESG Report: https://arm.co.za/wp-content/uploads/2022/10/2022-Environmental-Social-and-Governance-ESG-Report.pdf
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published in 2022 ESG Report. See URL p.5.
EXPECTATION 2	Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	Annual Financial Audited Statements https://arm.co.za/wp-content/uploads/2022/10/2022-Annual-Financial-Statements.pdf
EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.	N/A

EITI International Secretariat

Phone: +47 222 00 800 • E-mail: secretariat@eiti.org • Twitter: [@EITlorg](https://twitter.com/EITlorg) • www.eiti.org

Address: Rådhusgata 26, 0151 Oslo, Norway • P.O. Box: Postboks 340 Sentrum, 0101 Oslo, Norway

<p>Does the company make disclosures with EITI Standard in or in relation to EITI implementing countries? Please see attachment on subsidiaries and complete the information, as requested.</p>	<p>N/A</p>
<p>Secretariat's assessment on Expectation 2</p>	<p>Expectation not applicable</p>
<p>Secretariat comment</p>	<p>List of controlled subsidiaries published. See URL pp. 113-115.</p> <p>African Rainbow Minerals does not operate in EITI implementing countries.</p>
<p>EXPECTATION 3</p> <p>Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.</p>	
<p>Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates in the oil, gas and mining sectors?</p>	<p>Yes</p>
<p>URL to disclosures of taxes and payments to governments in non-EITI implementing countries</p>	<p>2022 Integrated Annual Report: https://arm.co.za/wp-content/uploads/2022/10/2022-Integrated-Annual-Report.pdf</p>

Are the disclosures disaggregated by project?	Yes
Secretariat's assessment on Expectation 3	Expectation met
Secretariat comment	<p>African Rainbow Minerals discloses taxes and payments to governments in non-EITI implementing countries.</p> <p>The company discloses taxes and payments to governments disaggregated by project. See 2022 Integrated Annual Report p. 54-55.</p> <p>The International Secretariat notes that the company discloses taxes disaggregated by entity and operations. Currently, the company is only operating on extractive activities in South Africa.</p> <p>The Secretariat did not assess if the project-level disaggregation in non-EITI implementing countries was adequate or not.</p>
<p>EXPECTATION 4</p> <p>Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.</p>	
Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?	No
If yes, which countries?	N/A

EITI International Secretariat

Phone: +47 222 00 800 • E-mail: secretariat@eiti.org • Twitter: [@EITlorg](https://twitter.com/EITlorg) • www.eiti.org

Address: Rådhusgata 26, 0151 Oslo, Norway • P.O. Box: Postboks 340 Sentrum, 0101 Oslo, Norway



Does the company make disclosures in line with the EITI Standard/reporting guidelines?	Not applicable
URL for disclosure	
Secretariat's assessment on Expectation 4	Expectation not applicable
Secretariat comment	African Rainbow Minerals does not buy oil, gas and/or mineral resources from the state in EITI implementing countries.
EXPECTATION 5	In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.
Does the company disclose its audited financial statements?	Yes
URL audited financial statements	2022 Annual Financial Statements: https://arm.co.za/wp-content/uploads/2022/10/2022-Annual-Financial-Statements.pdf
Secretariat's assessment on Expectation 5	Expectation met

Secretariat comment	African Rainbow Minerals discloses audited financial statements. See URL p.
EXPECTATION 6	Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.
Does the company publish a statement of support for beneficial ownership transparency?	No
URL statement of support for beneficial ownership	https://arm.co.za/wp-content/uploads/2022/10/2022-Environmental-Social-and-Governance-ESG-Report.pdf
Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes
Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange	Johannesburg Stock Exchange
URL to stock exchange	https://www.jse.co.za/

<p>URL for recent beneficial ownership disclosures</p>	<p>Annual financial statements: https://arm.co.za/wp-content/uploads/2022/10/2022-Annual-Financial-Statements.pdf</p> <p>ESG Report: https://arm.co.za/wp-content/uploads/2022/10/2022-Environmental-Social-and-Governance-ESG-Report.pdf</p>
<p>Secretariat's assessment on Expectation 6</p>	<p>Expectation partially met</p>
<p>Secretariat comment</p>	<p>African Rainbow Minerals (ARM) does not publish a statement of support for beneficial ownership transparency.</p> <p>The company discloses beneficial owners in line with applicable regulations and listing requirements. On its “2022 Annual Financial Statements”, ARM include details on shareholder analysis. See URL, pp. 123-126.</p> <p>Additionally, the “2022 Environmental, Social and Governance (ESG) Report”, includes a section that lists shareholders. See URL.</p>
<p>EXPECTATION 7</p> <p>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</p>	
<p>Does the company publish an anti-corruption policy?</p>	<p>Yes</p>
<p>URL to the policy</p>	<p>ARM Code of Conduct 2021: https://arm.co.za/wp-content/uploads/2021/12/ARM-Code-of-Conduct-2021.pdf</p>

Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?	Yes
Secretariat's assessment on Expectation 7	Expectation met
Secretariat comment	<p>The company publishes an anti-corruption policy. See URL.</p> <p>ARM's anti-corruption policy sets out how the company manages corruption risk through the identification and use of beneficial ownership data.</p> <p>The International Secretariat notes that ARM's "Code of Conduct" discusses conflicts of interest, relationships with suppliers and contractors, anti-corruption and identifying bribery and corruption "red flags". Section 7.3.2 of the "Associated Parties" chapter postulates that "Before engaging with any Associated Parties, ARM will ensure that proper third party and vendor due diligence and supplier vetting is performed in accordance with ARM's internal procedures and that those Associated Parties agree to be bound by the provisions of this Code" (PDF p. 14).</p>

EXPECTATION 8

Publicly declare and publish support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI

EITI International Secretariat

Phone: +47 222 00 800 • E-mail: secretariat@eiti.org • Twitter: [@EITlorg](https://twitter.com/EITlorg) • www.eiti.org

Address: Rådhusgata 26, 0151 Oslo, Norway • P.O. Box: Postboks 340 Sentrum, 0101 Oslo, Norway

implementing countries consistent with government procedures.	
Does the company publish a statement of support for contract transparency?	Yes
URL for statement of support for contract transparency	
Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?	N/A
Secretariat's assessment on Expectation 8	Expectation met
Secretariat comment	<p>African Rainbow Minerals publishes a statement of support for governments' efforts to publicly disclose contracts and licenses. See URL (ICMM Member statement).</p> <p>The company is not assessed on its contribution to disclosure of contracts and licenses in EITI implementing countries because the company does not operate in EITI implementing countries.</p>
EXPECTATION 9	
Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.	



Does the company publish a commitment/policy on gender diversity?	Yes
Does the company disclose employment data disaggregated by gender?	Yes
URL for relevant information	ESG Report: https://arm.co.za/wp-content/uploads/2022/10/2022-Environmental-Social-and-Governance-ESG-Report.pdf Supplementary datasheet: https://www.arm-ir-reports.co.za/reports/arm-iar-2022/index.php
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	African Rainbow Minerals publishes commitment and/or policy on gender diversity. See URL p.100 and p.123. The company discloses employment data disaggregated by gender on its ESG report. See URLs.