

EITI International Secretariat's Final Assessment

Company progress in meeting the Expectations for EITI supporting companies

Company name	Base Titanium
Sector	Mining
Headquarters	Kwale, Kenya
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?	Yes
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

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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	Governance and standards webpage: https://basetitanium.com/who-we-are/governance-and-standards/
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published on website. See URL.
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	2022 Annual report: https://wcsecure.weblink.com.au/pdf/BSE/02555724.pdf
EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.	N/A



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.	N/A
Secretariat's assessment on Expectation 2	Expectation not applicable
Secretariat comment	List of group-level controlled subsidiaries published. See URL p. 105. Base Titanium is a subsidiary of Base Resources and does not operate in EITI implementing countries.
EXPECTATION 3	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.
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?	Yes
URL to disclosures of taxes and payments to governments in non-EITI implementing countries	FY22 statement of payments to Government and National Entities webpage section: https://basetitanium.com/who-we-are/governance-and-standards/
Are the disclosures disaggregated by project?	Yes

Secretariat's assessment on Expectation 3	Expectation met
Secretariat comment	<p>Base Titanium discloses taxes and payments to governments in non-EITI implementing countries (Kenya). See FY22 statement of payments to Government and National Entities webpage section URL.</p> <p>The company discloses taxes and payments to governments disaggregated by project. Base Titanium operates only one project: The Kwale Mining Operation in Kenya.</p> <p>The Secretariat did not assess if the project-level disaggregation in non-EITI implementing countries was adequate or not.</p>
EXPECTATION 4	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.
Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?	No
If yes, which countries?	N/A



Does the company make disclosures in line with the EITI Standard/reporting guidelines?	Not applicable
URL for disclosure	None
Secretariat's assessment on Expectation 4	Expectation not applicable
Secretariat comment	Base Titanium 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	https://wcsecure.weblink.com.au/pdf/BSE/02555724.pdf
Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	Base Titanium discloses audited financial statements. See URL p. 80.



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	Governance and standards webpage: https://basetitanium.com/who-we-are/governance-and-standards/
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	https://baseresources.com.au/investors/ Australian Securities Exchange, AIM London Stock Exchange
URL to stock exchange	AIM London Stock Exchange: https://www.londonstockexchange.com/stock/BSE/base-resources-limited/company-page
URL for recent beneficial ownership disclosures	Shareholder information: https://baseresources.com.au/investors/shareholder-information/ AIM information disclosure: https://baseresources.com.au/investors/aim-rule-26/

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Secretariat's assessment on Expectation 6	Expectation partially met
Secretariat comment	<p>Base Titanium does not publish statement of support for beneficial ownership transparency.</p> <p>The company discloses beneficial owners in line with applicable regulations and listing requirements.</p>
EXPECTATION 7	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.
Does the company publish an anti-corruption policy?	Yes
URL to the policy	<p>Risk Management Policy PDF: https://s3-ap-southeast-2.amazonaws.com/assets.baseresources.com.au/wp-content/uploads/2013/05/23131714/BPOL012-Risk-Management-Policy.pdf</p> <p>Integrity Standard PDF: https://s3-ap-southeast-2.amazonaws.com/assets.baseresources.com.au/wp-content/uploads/2022/02/23110922/BST009-Integrity-Standard_Rev-4_FINAL_website.pdf</p> <p>Procurement and Supply Policy PDF: https://s3-ap-southeast-2.amazonaws.com/assets.baseresources.com.au/wp-content/uploads/2012/05/01112320/BPOL007-Procurement-and-Supply-Policy-1.pdf</p>

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<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?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 7</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>The company publishes an anti-corruption policy. See URLs.</p> <p>Base Titanium's anti-corruption framework sets out how the company manages corruption risk through the identification and use of beneficial ownership data.</p> <p>The International Secretariat notes that Base Titanium follows Base Resources' "Integrity Standard" and "Risk Management Policy". The Standard includes provisions on corruption, bribery, risk management, and is created in accordance with applicable laws, including Kenya's Anti-Corruption and Economic Crimes Act (No. 3 of 2003) and Bribery Act (No 47. of 2016). The "Integrity Standard" includes in its chapter 5 on "Requirements" (PDF pp. 5) a section on what "5.4 All Managers Are Required To:" a provision on the collection of beneficial ownership data by stating that "Before entering into contractual arrangements with third parties in a material matter, perform due diligence to ensure that Base understands the owners and controlling person(s) of such third parties. It will rarely be appropriate to engage a third party connected with a government official" (p. 9).</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 implementing countries consistent with government procedures.	
Does the company publish a statement of support for contract transparency?	N/A
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 not applicable
Secretariat comment	<p>Base Titanium does not publish statement of support for governments' efforts to publicly disclose contracts and licenses.</p> <p>The Secretariat notes that the company was not assessed on 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	Diversity Standard: https://s3-ap-southeast-2.amazonaws.com/assets.baseresources.com.au/wp-content/uploads/2021/02/02211444/Diversity-Standard_Rev-2-28.07.2020.pdf Annual Report: https://baseresources.com.au/investors/reports/
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	Base Titanium publishes commitment and/or policy on gender diversity in its Diversity Standard. See URL. The company discloses employment data disaggregated by gender on its Annual Report. See URL p.77.