

EITI International Secretariat's Final Assessment

Company progress in meeting the Expectations for EITI supporting companies

Company name	OCP S.A.
Sector	Mining
Headquarters	Casablanca, Morocco
Type	State Owned Enterprise (SOE)
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

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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?	Partial
URL for Statement Support	None
Secretariat's assessment on Expectation 1	Expectation partially met
Secretariat comment	Statement of support not published. The company has published on Twitter a brief statement indicating its sign-up to the EITI and indicating its commitment to transparency and accountability. the company should publish a statement of support for the EITI on its website or in other company reporting to meet Expectation 1.
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	https://www.ocpgroup.ma/fr/investors/Resultats-financiers

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<p>EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.</p>	<p>N/A</p>
<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 to "Annual Financial Report 2021", p. 11.</p> <p>OCP Group 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>OCP Sustainability Integrated Report 2021: https://www.ocpgroup.ma/Recent-publications</p> <p>Consolidated Financial Statements At 31 December 2022 PDF: https://ocpsiteprodsa.blob.core.windows.net/media/2023-03/OCP%20FY%202022%20IFRS%20Consolidated%20Financial%20Statements_1.pdf</p>
<p>Are the disclosures disaggregated by project?</p>	<p>Partial</p>
<p>Secretariat's assessment on Expectation 3</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>OCP Group discloses taxes and payments to governments in non EITI implementing countries. See URL to “OCP Sustainability Integrated Report”, p. 115.</p> <p>The company partially discloses taxes and payments to governments disaggregated by project. See URL to “OCP Consolidated Financial Statements”, p. 14, where information on tax is disaggregated by operation segment.</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		
Secretariat's assessment on Expectation 4	Expectation not applicable	
Secretariat comment	OCP Group 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	Website: https://www.ocpgroup.ma/Recent-publications PDF: https://ocpsiteprodsa.blob.core.windows.net/media/2022-04/RFA2021.pdf
Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	OCP S.A. discloses audited financial statements. See URLs.
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	None
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	Not applicable



URL to stock exchange	Not applicable
URL for recent beneficial ownership disclosures	https://www.ocpgroup.ma/board-governance-and-policies
Secretariat's assessment on Expectation 6	Expectation partially met
Secretariat comment	<p>OCP Group does not publish statement of support for beneficial ownership transparency.</p> <p>The company is state-owned; therefore, its beneficial owner is the Government of Morocco. Additionally, the company discloses its corporate structure on its website. See URL.</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>Policies and standards webpage: https://www.ocpgroup.ma/sustainability/policies-and-standards</p> <p>Anti-Bribery and Anti-Corruption Policy PDF: https://ocpsiteprodsa.blob.core.windows.net/media/2021-11/OCP%20Anti-bribery%20policy.pdf</p> <p>Supplier Code of Conduct: https://ocpsiteprodsa.blob.core.windows.net/media/2021-11/28_OCP%20Supplier%20Code%20of%20conduct.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?	Partial
Secretariat's assessment on Expectation 7	Expectation partially met
Secretariat comment	<p>The company publishes an anti-corruption policy. See URLs.</p> <p>OCP Group's anti-corruption framework partially sets out how the company manages corruption risk through the identification and use of beneficial ownership data.</p> <p>The International Secretariat notes that OCP Group's "Anti-Bribery and Anti-Corruption Policy" discusses due diligence on business partners, including anti-corruption diligence. However, it is unclear whether the company's policies consider the use of beneficial ownership information. OCP's Anti-bribery and anti-corruption policy defines business partners, bribery, conflict of interest, corruption and government officials. It also sets principles and rules that should guide the company's behavior when dealing with risks associated to gifts, grants, political contributions,</p>

	<p>hospitality, relationships with government officials, etc. Section 5.4 specifies that the company shall not engage with business partners before due diligence procedures had been performed. Similarly, the OCP Code of Conduct, section 1.3 on Dealing with Third Parties, claims that Anti-Trust laws cover many aspects of OCP dealings with Business partners. The company's supplier code of conduct further specifies the standards of conduct for third parties.</p>
<p>EXPECTATION 8</p>	<p>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.</p>
<p>Does the company publish a statement of support for contract transparency?</p>	<p>N/A</p>
<p>URL for statement of support for contract transparency</p>	<p>None</p>
<p>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</p>	<p>N/A</p>
<p>Secretariat's assessment on Expectation 8</p>	<p>Expectation not applicable</p>

Secretariat comment	<p>OCP Group does not publish a statement of support for governments' efforts to publicly disclose contracts and licenses.</p> <p>The Secretariat notes that the company was 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>
<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.</p>	
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	<p>Diversity & Inclusion Policy: https://www.ocpgroup.ma/sustainability/policies-and-standards</p> <p>Diversity & Inclusion Policy (PDF): https://ocpsiteprodsa.blob.core.windows.net/media/2021-11/21_OCP%20Diversity%20%26%20inclusion%20policy.pdf</p> <p>Sustainability Integrated Report 2021 PDF: https://ocpsiteprodsa.blob.core.windows.net/media/2022-08/OCP%20GROUP%20INTEGRATED%20REPORT%202021.pdf</p>
Secretariat's assessment on Expectation 9	Expectation met



Secretariat comment	<p>OCP S.A. publishes commitment and/or policy on gender diversity. See URL. p.3.</p> <p>The company discloses employment data disaggregated by gender on its sustainability integrated report. See URL p.39.</p>
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