

Assessment of Company Expectations 2025/26

Company adherence to the Expectations for EITI supporting companies

Company name	OCP Group
Sector	Mining
Headquarters	Casablanca, Morocco
Type	State-owned enterprise (SOE)
Date of submission to company (month/year)	January 2026
PREAMBLE <i>MSG Participation</i>	<i>Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). This data is collected for information purposes.</i>
Does the company participate in a multi-stakeholder group?	N/A
If yes, indicate in which countries the company is participating in MSGs?	N/A
Secretariat comment on MSG participation	The Secretariat notes that the company does not operate in EITI implementing countries. The Secretariat thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries and encourages supporting companies to take part in MSGs in the EITI implementing countries in which they operate.
EXPECTATION 1 <i>Public support for the EITI</i>	<i>Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.</i>

Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Partial
URL for Statement Support	Sustainability Report 2024: https://ocpsiteprodsa.blob.core.windows.net/media/2025-08/OCP_Sustainability_Report_2024_.pdf
Secretariat's assessment on Expectation 1	Expectation partially met
Secretariat comment	<p>OCP Group publish a partial statement of support for the EITI in their 2024 Sustainability Report. See URL pgs. 31 & 332.</p> <p>The report lists the EITI among the professional organisations of which OCP Group is a member but does not include a further statement of support for the EITI or its objectives.</p> <p>The Secretariat encourages OCP Group to publicly declare and publish support for the EITI in line with Expectation 1.</p>
EXPECTATION 2 <i>Disclosures in accordance with the EITI Standard</i>	<i>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.</i>
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	2024 Consolidated Financial Statements: https://ocpsiteprodsa.blob.core.windows.net/media/2025-03/Plaquette%20OCP%20IFRS_31De%CC%81c24_27032025_v_UK_0.pdf
EITI implementing countries where the company operates.	N/A
Does the company make disclosures in accordance with the EITI Standard or	N/A

in relation to EITI implementing countries?	
Secretariat's assessment on Expectation 2	Expectation met
Secretariat comment	OCP Group publish a list of controlled subsidiaries in their 2024 Consolidated Financial Statements. See URL pg. 12. OCP Group do not operate in EITI implementing countries, therefore the second part of Expectation 2 is not applicable.
EXPECTATION 3 <i>Disclosure of taxes and payments in non-EITI implementing countries</i>	<i>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.</i>
Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates upstream in the oil, gas and mining sectors?	Yes
URL to disclosures of taxes and payments to governments in non-EITI implementing countries	2024 Consolidated Financial Statements: https://ocpsiteprodsa.blob.core.windows.net/media/2025-03/Plaque%20OCP%20IFRS_31De%CC%81c24_27032025_vUK_0.pdf 2024 Sustainability Report: https://ocpsiteprodsa.blob.core.windows.net/media/2025-08/OCP_Sustainability_Report_2024_2.pdf
Are the disclosures disaggregated by project?	No
Secretariat's assessment on Expectation 3	Expectation partially met
Secretariat comment	OCP Group discloses payments to government in a non-EITI implementing country. See URL.

	<p>The company does not disclose taxes and payments to government disaggregated by project.</p> <p>The company discloses its total annual income tax expense for the year and its dividend payment to the Moroccan State in its 2024 consolidated financial statements, other types of taxes and payments are not included in the reporting. The payment information is not further disaggregated by project. See URL pg. 50-52.</p> <p>The Secretariat did not verify whether project-level disaggregation in all non-EITI implementing countries was adequate, as definitions vary across jurisdictions.</p>
<p>EXPECTATION 4 <i>Commodity trading transparency</i></p>	<p><i>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.</i></p>
<p>Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?</p>	<p>No</p>
<p>If yes, which countries?</p>	<p>N/A</p>
<p>Does the company make disclosures in line with the EITI Standard and reporting guidelines?</p>	<p>N/A</p>
<p>URL for disclosure(s)</p>	<p>N/A</p>
<p>Secretariat's assessment on Expectation 4</p>	<p>Expectation not applicable</p>
<p>Secretariat comment</p>	<p>OCP Group does not buy oil, gas and/or mineral resources from the state in EITI implementing countries.</p>

EXPECTATION 5 <i>Disclosure of audited financial statements</i> <i>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.</i>	
Does the company disclose its audited financial statements?	Yes
URL audited financial statements	2024 Consolidated Financial Statements: https://ocpsiteprodsa.blob.core.windows.net/media/2025-03/Plaque%20CP%20IFRS_31De%CC%81c24_27032025_vUK_0.pdf
Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	OCP Group discloses audited financial statements. See URL.
EXPECTATION 6 <i>Beneficial ownership transparency</i> <i>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.</i>	
Does the company publish a statement of support for beneficial ownership transparency?	No
URL for statement of support for Beneficial Ownership	N/A
Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes

<p>Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange</p>	<p>N/A</p>
<p>URL to stock exchange</p>	<p>N/A</p>
<p>URL for recent beneficial ownership disclosures</p>	<p>Our Governance Webpage: https://www.ocpgroup.ma/board-governance-and-policies</p> <p>Our History: https://www.ocpgroup.ma/board-governance-and-policies</p> <p>2024 Consolidated Financial Statements: https://ocpsiteprodsa.blob.core.windows.net/media/2025-03/Plaquette%20OCP%20IFRS_31De%CC%81c24_27032025_vUK_0.pdf</p>
<p>Secretariat's assessment on Expectation 6</p>	<p>Expectation partially met</p>
<p>Secretariat comment</p>	<p>OCP Group does not publish a statement of support for beneficial ownership transparency.</p> <p>OCP Group discloses information on its senior management and Board directors on its website: See URL Our Governance Webpage.</p> <p>OCP Group states on the "Our History" Page of its website that it is owned by the Moroccan Government and the Banque Populaire du Maroc. See URL Our History Webpage.</p> <p>Further details of this ownership are disclosed in the 2024 Consolidated financial Statements. "The State of Morocco is a shareholder of OCP with a majority share of 94.12%. The BCP group holds 5.00% with direct participation and participations through its subsidiaries Socinvest, Infra Maroc Capital and Prev Invest.SA." See URL pg. 54.</p> <p>To improve this disclosure, the Secretariat notes OCP Group could also publish details about how the Moroccan Government exerts control over the company in line with Requirement 2.5(v) of the EITI Standard. The Secretariat further notes In line with Requirement 2.6(e) of the EITI Standard, where feasible, SOEs are encouraged to disclose the identity and beneficial ownership of</p>

	<p>their agents or intermediaries, suppliers or contractors for material transactions.</p> <p>The Secretariat encourages OCP Group to publish a statement of support for beneficial ownership transparency to further meet this Expectation.</p>
<p>EXPECTATION 7 <i>Due diligence processes and anti-corruption policies</i></p>	<p><i>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.</i></p>
<p>Does the company publish an anti-corruption policy?</p>	<p>Yes</p>
<p>URL to the policy</p>	<p>Anti-Bribery and Anti-Corruption Policy: https://ocpsiteprodsa.blob.core.windows.net/media/2021-11/OCP%20Anti-bribery%20policy.pdf</p> <p>Code of Conduct: https://ocpsiteprodsa.blob.core.windows.net/media/2021-11/Code%20of%20conduct.pdf</p> <p>Supplier Code of Conduct: https://ocpsiteprodsa.blob.core.windows.net/media/2021-11/28_OCP%20Supplier%20Code%20of%20conduct.pdf</p> <p>Responsible Procurement Policy: https://ocpsiteprodsa.blob.core.windows.net/media/2021-11/13_OCP%20Responsible%20procurement%20policy.pdf</p> <p>2024 Sustainability Report: https://ocpsiteprodsa.blob.core.windows.net/media/2025-08/OCP_Sustainability_Report_2024_2.pdf</p>
<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>Partial</p>

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 Anti-Bribery and Anti-Corruption Policy applies to OCP Group, its affiliates, and all related officers, directors, employees, and contract or temporary workers. The policy defines bribery and corruption, outlines potential forms of corrupt practices, and sets out principles and procedures to mitigate corruption risks. The Supplier Code of Conduct references a requirement for suppliers to collaborate in the systematic due diligence and verification processes. This due diligence process is referenced in relation to the prevention of money laundering and financial crime. The code prohibits all forms of corruptions for suppliers. The Responsible Procurement Policy states "OCP Group commits to conduct an ongoing process of due diligence and risks identification regarding the sustainability issues hereinbefore expressed in its procurement processes." the policy includes a provision prohibiting corruption.</p> <p>The policies and reporting do not include a description of whether or how the company collects or uses beneficial ownership data in the due diligence process.</p> <p>The Secretariat encourages the company to strengthen its anti-corruption policy by clarifying how it collects and uses beneficial ownership data in its management of corruption risks to achieve fully met in this Expectation.</p>
<p>EXPECTATION 8 <i>Contract transparency</i></p> <p><i>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.</i></p>	
Does the company publish a statement of support for contract transparency?	No

URL for statement of support for contract transparency	N/A
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 met
Secretariat comment	<p>OCP Group does not publish a statement of support for governments efforts to publicly disclose contracts and licenses.</p> <p>OCP Group does not operate in any EITI implementing countries and is therefore not assessed for its contribution to the public disclosure of contracts and licenses in EITI implementing countries.</p> <p>To make further progress on Expectation 8, the Secretariats encourages the company to publish a statement of support for “governments’ efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals to fully meet this Expectation.</p>
EXPECTATION 9 Gender Diversity	<i>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.</i>
Does the company publish a commitment/policy on gender diversity?	Yes
URL for commitment/policy on gender diversity	<p>Diversity and Inclusion Policy: https://ocpsiteprodsa.blob.core.windows.net/media/2021-11/21_OCP%20Diversity%20%26%20inclusion%20policy.pdf</p> <p>2024 Sustainability Report: https://ocpsiteprodsa.blob.core.windows.net/media/2021-11/21_OCP%20Diversity%20%26%20inclusion%20policy.pdf</p>

Does the company disclose employment data disaggregated by gender?	Yes
URL for gender disaggregated employment data	2024 Sustainability Report: https://ocpsiteprodsa.blob.core.windows.net/media/2021-11/21_OCP%20Diversity%20%26%20inclusion%20policy.pdf
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	<p>OCP Group Publishes a commitment and/or policy on gender diversity. This policy is contained within the Diversity and Inclusion Policy and the 2024 Sustainability Report. See URLs.</p> <p>OCP Group publishes employment data disaggregated by gender. This data is further disaggregated by nationality, age, professional category, contract type and occupational level. See URL for Sustainability Report 2024 pgs. 143-145.</p>