
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ULSAN ALUMINUM LIMITED

CERTIFICATE
NUMBER

159

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

26 OCTOBER 2021

DATE OF EXPIRY

25 OCTOBER 2024

CERTIFIED SINCE

26 OCTOBER 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

All activities at Ulsan Aluminum Limited in Ulsan, South Korea, including the manufacture of aluminium and aluminium coil and sheet specifically for automotive, can and specialty products.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc. and Kobe Steel, Ltd.
ENTITY NAME	Ulsan Aluminum Limited
CERTIFICATION SCOPE	All activities at Ulsan Aluminum Limited in Ulsan, South Korea, including the manufacture of aluminium and aluminium coil and sheet specifically for automotive, can and specialty products.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">13 – 17 September 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">30 September 2021
AUDIT SCOPE	<p>The audit scope includes all activities at Ulsan Aluminum Ltd. in Ulsan, South Korea, including the manufacture of aluminium and aluminium coil and sheet specifically for automotive, can and specialty products.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:

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- ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
 - ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - ☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD	26 October 2021 – 25 October 2024
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	26 April 2023
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CERTIFICATE NUMBER	159
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SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a policy, procedure and process to ensure compliance with applicable laws are established and maintained. Legal registers for social, ethics and environment aspects are maintained, and the Entity's legal registers are communicated with employees and workers to ensure awareness of the applicable laws.
1.2 Anti-Corruption	Conformance	The Entity has established policies and procedures on anti-corruption. Anti-corruption is addressed in the Entity's Anti-Corruption Policy, Code of Conduct, and Supplier Code of Conduct. Training on the Entity's policies is provided with employees and workers, and Supplier Code of Conducts is signed and acknowledged by suppliers (internal and external suppliers). The Entity's Anti-Corruption Policy, Code of Conduct and Supplier Code of Conduct is accessible and downloadable at: https://ulsanaluminum.com/home/vision/vision03.jsp
1.3 Code of Conduct	Conformance	The Entity has established and implemented its Code of Conduct and Supplier Code of Conduct which includes principles related to environmental, social, governance, and commitment to local communities. The Entity is provided with training, and communication on the Code of Conduct to its employees and workers. More information of the Entity's Code of Conduct and Supplier Code of Conduct is accessible and downloadable at: https://ulsanaluminum.com/home/vision/vision03.jsp
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established policies, systems, procedures, and processes that conform to the requirements of environmental, social, and governance principles. The Entity's policies and Code of Conduct are accessible at the Entity's intranet for communication with workers. The Entity's Code of Conduct is accessible at: https://ulsanaluminum.com/home/vision/vision03.jsp and the Entity's Environment, Health & Safety Policy is accessible at: https://ulsanaluminum.com/home/vision/vision02.jsp
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management demonstrates commitment to implementation of policies, endorsement, and support to provide sufficient

CRITERION	RATING	COMMENT
		resources for regular review of policies to ensure compliance with ASI Performance Standard requirements.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The policies are available for internal and external stakeholders by communication through posting at the Entity's premise, through publishing at the Entity's intranet, and website. The Entity's Code of Conduct is accessible at: https://ulsanaluminum.com/home/vision/vision03.jsp and the Entity's Environment, Health & Safety Policy is accessible at: https://ulsanaluminum.com/home/vision/vision02.jsp .
2.2 Leadership	Conformance	The Entity's senior management has appointed the Ulsan Plant Manager as the ASI Management Representative, and the responsibility and authority of each assigned personnel, and their key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and maintains a valid ISO 14001:2015, Environmental Management Systems Certification.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and maintained an integrated social management system manual to manage relevant ASI Performance Standard. The Entity has implemented and documented an Occupational Health and Safety Management System, and maintains a valid ISO 45001:2018, Occupational Health and Safety Management Systems Certificate.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented a policy, system and processes that conform to the responsible sourcing requirements. Major suppliers are signed to comply with the Entity's Supplier Code of Conduct accessible at the Entity's website at: https://ulsanaluminum.com/home/vision/vision03.jsp and the Entity conducts supplier audits to major next tier suppliers and contractors (internal and external).
2.5 Impact Assessments	Conformance	Risk Assessment on Environmental, Social, Health & Safety, Cultural and Human Rights, and Governance is conducted by the Entity. Identified risks on social, environment, health & safety, and governance are assessed, and the associated control measures are established, and implemented.
2.6 Emergency Response Plan	Conformance	The Entity has established and maintains Emergency Management Plans and External Communication

CRITERION	RATING	COMMENT
		Plans. The Entity's plans include collaboration with potentially affected stakeholder groups such as communities, workers in the Entity and in the in-house contractors. The workers and employees are provided with relevant emergency training, and emergency drills.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a management procedure in case of Mergers and Acquisitions based on the requirement of ASI Performance Standard. No such activity has happened since the Entity became a member of ASI.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established management procedure in case of Closure, Decommissioning and Divestment is established based on the requirement of ASI Performance Standard. No such activity has happened since the Entity became a member of ASI.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity's Sustainability report is published and is publicly accessible at the Entity's website at: https://ulsanaluminum.com/home/vision/vision01.jsp The Entity's main targets and performance on Social, Environment and Governance aspects are addressed in the Entity's Sustainability Report.
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with applicable law and regulations. A list of fines imposed on the Entity with corrective actions completed is addressed in the Entity's Sustainability Report (at Health and Safety Violation and Corrective Actions) accessible at the Entity's website at: https://ulsanaluminum.com/home/vision/vision01.jsp
3.3a Payments to governments (legal and contractual)	Conformance	Annual financial information is verified by an external third party accounting firm and financial results are disclosed at the Entity's website: https://ulsanaluminum.com/home/intro/intro04.jsp and public government website: http://dart.fss.or.kr/ Certificates of full national/local tax payment to government are issued by government agencies.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Internal complaint or grievance reporting mechanisms are available including hotline numbers, anonymous suggestion boxes, grievance handling council members and the Entity's website. External complaints or whistle-blowing mechanisms are managed through the Entity's website. A grievance register is maintained.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Environmental Life Cycle Assessments covering final applications (Industrial Products, Automotive, and Can) for the Entity's products are conducted by the external third party. The Environmental Life Cycle Assessment reports are cradle-to-grave, and it is based on the ISO 14040:2006 Environmental management, Life cycle assessment, Principles and Framework Standard.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	A Summary Report of the Environmental Life Cycle Assessment is accessible at the Entity's website at: https://ulsanaluminum.com/home/vision/vision01.jsp and states the full Environmental Life Cycle Assessment report can be provided upon request. There have been no requests of the report to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	A Summary Report of the Environmental Life Cycle Assessment is published in Korean, and it is accessible at the Entity's website at: https://ulsanaluminum.com/home/vision/vision01.jsp for public communication.
4.2 Product design	Conformance	The Entity integrates relevant objectives in the design and development for production process to enhance sustainability, including the environmental life cycle impacts of the products. The target for these relevant aspects is defined annually, monitored monthly and evaluated every year.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity's Scrap Collection Standard, and Sustainability Report which is accessible at the Entity's website at: https://ulsanaluminum.com/home/vision/vision01.jsp Process scrap is 100% recycled. Process scraps within its own close-loop system operations are collected from production facilities and recycled. The Entity established a 100% of scrap target for collection, recycling and/or re-use.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity separates Aluminium alloys as per the Entity's Scrap Collection Standard and Scrapyard Operation Procedure. The Entity's Scrap Collection

CRITERION	RATING	COMMENT
		Standard, and Sustainability Report which is accessible at the Entity's website at: https://ulsanaluminum.com/home/vision/vision01.jsp
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	A commitment to increase use of recycled scraps is established in the Entity's strategy Plan. The Entity's strategy target is addressed in the Entity's Strategy Plan 2021 and RAR (RunARound) Scrap Management 2021. The Entity has established recycling target of using external scraps, and targets are monitored monthly.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	No local, or national collection and recycling system for Aluminium scrap is in place in Korea. The Entity has its own recycling systems and plans to enhance recycling rates in production of the Entity's products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity is under Greenhouse Gas (GHG) Emission Trading Scheme regulated by the Korean Government. Scope 1 and 2 GHG emissions and energy use by source are tracked, calculated, and documented. GHG emission and Energy use are verified by the accredited third party annually. Results of GHG emission and Energy use in 2019 and 2020 are included in the Sustainability Report (under Environment Result Section) available on the Entity's website at: https://ulsanaluminum.com/home/vision/vision01.jsp The Entity's GHG emission and energy use is disclosed also at the public website of National Greenhouse Gas Inventory and Research Center operated by the Ministry of Environment at: www.gir.go.kr
5.2 GHG emissions reductions	Conformance	GHG emission reduction targets (Scope 1 and 2) aligning with the Corporate target assigned are set by the Entity. The associated management plans to achieve reduction target is established and implemented. GHG target and Results of GHG emission and Energy use (Scope 1 and 2) are accessible at the Entity's Sustainability Report (under Sustainability Target section, and Environment Result section) which is available on the Entity's website at: https://ulsanaluminum.com/home/vision/vision01.jsp
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The operation of air emission facilities are approved by the Korean Government. The pollutants in the air emission are quantified in the Environmental Impact Assessment report. The waste air generated in the operation is collected and treated before emission to mitigate adverse impacts. Air emissions have not exceeded legal emission limits since 2001. Annual air emission volumes by pollutant are disclosed at: https://www.env-info.kr
6.2 Discharges to Water	Conformance	The Entity operates wastewater treatment plants on site. The Entity has setup water reduction targets and plans to minimize adverse impacts. Amount of water use and wastewater discharge is accessible at the Entity's Sustainability Report (under Sustainability Target Sections) available at: https://ulsanaluminum.com/home/vision/vision01.jsp There has been no reported case of any wastewater limit exceedance since 2001.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	An Environmental Impact Assessment on Spills and Leakages as per the Entity's Environmental Impact Assessment Procedure is conducted, and Off-site Risk Assessment on where Spills and Leakage may contaminate air, water, and soil is conducted by an external third party organization. Results of the assessment risk have been determined as low.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Following Environmental Impact Assessment and off-site risk assessment, the Entity has established control plans to prevent spills and leakage. The relevant training is provided to workers. The scope and responsibility for external communication on spill/leakage is defined in the Instruction for Crisis Communication and Procedure for Emergency Response. Periodic soil and leakage test are conducted by external organizations and relevant test reports are developed and maintained.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has established a system to report the spill/leakage the government agency. Scope and responsibility for internal and external communication and disclosure on spill/leakage is defined in the Procedure for Emergency Response and Emergency

CRITERION	RATING	COMMENT
		Contact List. There have been no reported case of spills and leakages since 2001.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity's Annual Sustainability Report (under Environment Result section) discloses results of the impact assessments of the spills and case of incidents and is available at: https://ulsanaluminum.com/home/vision/vision01.jsp . There have been no reported case of spills for the previous three years.
6.5a Waste management and reporting (strategy)	Conformance	The Entity's corporate landfill waste target, reduction target of landfill waste and its achievement plans considering waste mitigation hierarchy all have been implemented. Wastes (both General and Hazardous) are transferred and disposed of by the qualified vendors and a waste reduction target is established by the Entity.
6.5b Waste management and reporting (disclosure)	Conformance	Quantities and disposal of the hazardous waste generated in the Entity are reported at: https://allbaro.or.kr and www.env-info.kr Annual quantities of Hazardous and Non-Hazardous Waste with associated disposal methods are presented in the Entity's Sustainability Report at: https://ulsanaluminum.com/home/vision/vision01.jsp
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity has implemented processes to minimize dross generation and maximize the recovery of aluminium by treatment of dross and dross residues. White dross is generated and collected in the Entity and other dross is processed by external dross processor. Dross residues generated from the external processor are recycled and not landfilled.
6.8b Dross (recycling)	Conformance	The Entity's Metal Plan includes dross target to minimize generation of dross, and the target is set, monitored, and controlled in the Entity. Dross generated from the production is processed by external dross processor, are dross residues are recycled and not landfilled.
6.8c Dross (review of alternatives)	Conformance	The Entity has implemented processes to minimize dross generation and maximize the recovery of aluminium by treatment of dross and dross residues. White dross is generated and collected in the Entity, and dross is processed by external dross processor. Dross residues are recycled and not landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's water source is raw water for production, canteen, and office administration, and discharged to local river following treatment by the Entity. A water flow diagram including withdrawal and use by source and type has been developed. Water usage and the generation of wastewater is monitored and controlled on a daily basis.
7.1b Water assessment (risk assessment)	Conformance	The Entity's Environmental Aspect Assessment lists specific water-related risks. The Entity's operational, internal, and external risks within their area of influence are taken into consideration in the water risk assessment. Due to the nature of the product, production processes, and the existing water management systems, risk level on the water has been assessed as low.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Conformance	An annual water saving target and Water Reduction Initiative as Water Saving Plans are established and conducted in the Entity. There are no identified significant water-related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Conformance	As per the Entity's Annual water saving target and Water Reduction Initiative, water saving target and saving plans are monitored every month. There are no identified significant water-related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	The water usage and risk related to water is accessible at the public government website at: www.env-info.kr and the Entity's Sustainability Report (under Environment Result section) at: https://ulsanaluminum.com/home/vision/vision01.jsp
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has developed a procedure for Environmental Aspect Analysis to assess impact and risk of biodiversity. Off-site Risk Assessment including biodiversity risks are conducted. The biodiversity risk or impact by the operation of the Entity in its internal and external Area of Influence was assessed as low. The outcome of risk assessment is accessible in the Entity's Sustainability Report at: https://ulsanaluminum.com/home/vision/vision01.jsp
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has developed a procedure for Environmental Aspect Analysis to assess impact and risk of biodiversity. Off-site Risk Assessment including biodiversity risks are conducted. The biodiversity risk or impact by the operation of the Entity in its internal and external Area of Influence was assessed as low. Control plans for mitigation of relevant biodiversity risks are established and managed in the Entity.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has developed a procedure for Environmental Aspect Analysis to assess impact and risk of biodiversity. The outcome of the risk assessments does not include any significant biodiversity impacts. The biodiversity risk or impact by the operation of the Entity in its internal and external Area of Influence was assessed as low. Control plans for mitigation of relevant biodiversity risks are established and managed in the Entity.

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Conformance	Based on the Entity's Environment Impact Assessment and Off-site Risk Assessment, biodiversity risk or impact by the operation of the Entity in its internal and external Area of Influence was assessed as low, and the outcome of the biodiversity risk assessment did not identify significant biodiversity impacts. The outcome of risk assessment is accessible in the Entity's Sustainability Report at: https://ulsanaluminum.com/home/vision/vision01.jsp
8.3 Alien Species	Conformance	Control plans to prevent introduction of alien species have been implemented by the Entity. Inspection of imported containers entering the Entity's facilities is undertaken and wooden pallets are processed in a way to avoid the introduction of alien species. Fumigation and sterilization for insect and pest control within the Entity is performed periodically.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The respect of Human Rights is committed in the Entity's Code of Conduct, and it is accessible at: https://ulsanaluminum.com/home/vision/vision03.jsp The Entity's Code of Conduct is communicated and trained to all managers, employees, and contractors in the Entity.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity is committed to respecting Human Rights via the Entity's Code of Conduct which includes the respect of Human Rights and is trained to all managers and employees. The due diligence process including identification and assessment of the potential risks for human rights-related issues is established and implemented. Compliance audits to the Entity and its in-house contractors are conducted to verify effectiveness of controls.

CRITERION	RATING	COMMENT
9.1c Human Rights Due Diligence (remediation)	Conformance	A risk assessment on Labor, Ethics, and Social aspects has been undertaken and includes remediation and control plans. The procedure for Risk Assessment of Labor, Ethics and Human Rights and Corrective Action Process have been established for the remediation process, and actions taken or planned are controlled in the Risk Assessment. Any issues causing adverse impacts to human rights were not identified.
9.2 Women's Rights	Conformance	The Entity is committed to respecting women's rights. Strategy and actions for the increase of gender diversity have been planned and implemented. The legal requirements on women's rights including maternity protection are identified, and addressed in the Entity's Employment Regulations. No complaints have been received on women's rights, including gender discrimination from women workers.
9.3 Indigenous Peoples	Not Applicable	This criterion is not applicable as there are no indigenous people within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This criterion is not applicable as there are no indigenous people within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Conformance	From a review of the official government website of Land Use and Development Information Service www.eum.go.kr and Land Registration Map, there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This criterion is not applicable as there was no resettlement necessary for the Entity's Certification Scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion is not applicable as there was no resettlement necessary for the Entity's Certification Scope.
9.7a Local Communities (rights and interests)	Conformance	The policy on respecting the legal and customary rights and interests of local communities is in place. The Entity has conducted relevant risk assessment, and addressed control plans accordingly. The Entity's local community support activities are stated at: https://ulsanaluminum.com/home/vision/vision05.jsp and Sustainability Report (Social Responsibility section) accessible at:

CRITERION	RATING	COMMENT
		https://ulsanaluminum.com/home/vision/vision01.jsp
9.7b Local Communities (impacts)	Conformance	The Entity has conducted the risk assessment on local community's rights. From review of result of the risk assessment, the adverse impact on the local communities by the Entity has been identified as limited.
9.7c Local Communities (livelihoods)	Conformance	Various activities including charity activities or support activities to the local communities are conducted by the Entity. The Entity's local community support activities are stated at: https://ulsanaluminum.com/home/vision/vision05.jsp and the Sustainability Report: https://ulsanaluminum.com/home/vision/vision01.jsp
9.8 Conflict-Affected and High-Risk Areas	Conformance	Formal policies (Conflict Mineral Declaration, Trade Restriction Compliance Policy) have been developed by the Entity so as not to support or not to use any conflict minerals. A risk assessment on conflict minerals use has been conducted, and it is confirmed that the Entity does not source from Conflict-Affected and High-Risk Areas. No complaints on conflict minerals have been received to date.
9.9 Security practice	Conformance	Security services are outsourced with the security contractor required to comply with the Entity's Supplier Code of Conduct. From a review of the Entity's Risk Assessment, site observation, and workers interview, restriction of free movement is not engaged by the security. No grievance or complaints against the security activities have been received to date.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity's Code of Conduct is committed to respect of freedom of association. Trade union is formed and formal Collective Bargaining Agreement (CBA) is in place. Union representatives are elected by workers in an anonymous, direct and confidential manner. Workers have a right to either join or not to join the Trade Union.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity is committed to respecting collective bargaining rights. A formal Collective Bargaining Agreement (CBA) is in place and it has been declared to the government. No complaints or negligence of collective bargaining rights have been received to date.

CRITERION	RATING	COMMENT
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	Trade union is formed, and Labour Management Council are established. Formal Labour Management Council Regulation is established, and it is declared to the government. Labour Management Council Meetings are held every quarter, and relevant meeting minutes are maintained.
10.2a Child Labour (minimum age)	Conformance	The Entity's Code of Conduct states prohibition of child labour under 15 years old. The Entity has established systems to monitor and verify workers' ages during hiring process. There is no history nor current use of child labour under 15 years old or any young worker under 18 years old in the Entity.
10.2b Child Labour (hazardous)	Conformance	The Entity's Hiring Regulations states that the Entity does not arrange young workers to work in hazardous working conditions, and the Entity has identified hazardous and restricted jobs for young workers under 18 years old. No history or current use of child labour under 15 years old or young workers under 18 years old has occurred.
10.2c Child Labour (worst forms)	Conformance	The Entity and the Entity's contractors in the Entity's premises are committed to prohibition of use or support of child labour. The Entity's Code of Conduct and Supplier Code of Conduct addresses the prohibition of child labour. No history or current use of child labour under 15 years old or young workers under 18 years old has occurred.
10.3a Forced Labour (human trafficking)	Minor Non-Conformance	The Entity is committed to the prohibition of forced labour, slavery, and human trafficking, which is addressed in the Entity's Code of Conduct and Supplier Code of Conduct for the Entity's suppliers and contractors. No foreign migrant workers are present in either the Entity and as subcontractors of the Entity. Any engagement or support of human trafficking was not found. However, one minor non-conformance was note with respect to absent mandatory items in the labour contract signed between workers and one of the in-house contractors at the canteen.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct state the prohibition of forced labour. From review of the Employment Regulation, Labour Contracts, and workers interview, workers are not required to pay any form of fees, savings, or deposits.

CRITERION	RATING	COMMENT
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign migrant workers or contractors present in the Entity. All workers are Korean.
10.3d Forced Labour (debt bondage)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct state prohibition of forced labour. From a review of the Entity's Employment Regulation and labour contracts signed between the Entity and workers, no terms of debt bondage labour were found. There are no practices of debt bondage labour noted in the Entity.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct state prohibition of forced labour. There are no practices of restriction of freedom of movement within or to/from the Entity.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Workers' original personal documents are not requested by the Entity during employment. Workers' original documents are not retained by the Entity, and only copies of original documents are kept in workers' files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's Employment Regulation states workers have the freedom to terminate their employment at any time without penalty, provided 15 days' notice in provided in advance. Workers can terminate the employment with a specific notice period in advance without any penalty. No complaints on restriction of freedom of termination are received to date.
10.4 Non-Discrimination	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct are committed to prohibition of any types of discrimination. The Entity's hiring process, job advertisement and job application template indicate the decisions are solely based on the candidate's ability to perform job requirements rather than other personal characteristics. Interviewed workers confirms no discrimination within the Entity and no case of grievances or complaints on discrimination have been received to date.
10.5 Communication and engagement	Conformance	Periodic communication including monthly communication meetings and quarterly Labour Management Council meetings between the Entity and workers or workers' representatives has been established and implemented. Workers can freely express their concerns or complaints regarding working conditions, resolution of workplace and compensation issues without threat of reprisal, intimidation, or harassment.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	The prohibition of inhumane treatment has been committed to via the Entity's regulations including the Code of Conduct and Employment Regulations. Disciplinary regulations and practices are in compliance with the relevant legal regulation (Labour Standard Act). A disciplinary register has been established and maintained and no case of inhumane treatment has been reported to date.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined and the Entity's minimum wage paid is higher than the legal minimum wage considering additional discretionary income. From the review of a sample of the Entity's pay slips, the Entity pays each worker 150% of the ordinary wage for overtime, night-time (22:00 to 06:00), and holiday work.
10.7b Remuneration (method of payment)	Conformance	Details on workers' payment are documented in the Entity's Wage List, and payment is paid on time directly to workers via bank transfer each month. Workers can check the details of their payment information every month through a mobile phone application. Monthly payment is made in a timely manner and there has been no delay in payment to workers recorded.
10.8 Working Time	Conformance	Regulations on working hours including holidays are addressed in the Entity's Employment Regulation. Working hours including overtime hours and leave information are recorded and monitored by the Entity and also checked by workers. Weekly working hours do not exceed the legal limit.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	An Occupational Health and Safety Policy has been established and is reviewed periodically during management review meetings. The Policy is posted throughout the facility and is also available at: https://ulsanaluminum.com/home/vision/vision02.jsp for communication with external stakeholders.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Occupational Health and Safety Policy is applied to all workers, and visitors, and their controls are under the Entity's Occupational Health & Safety Management System. Workers are regularly trained on health and safety aspects, and visitors need to take safety training before entering the Entity's premises.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Occupational Health and Safety policy includes a commitment to comply with the legal requirements and other requirements. Management system to identify all applicable legal requirements and other requirements, and to evaluate legal compliance is established, and implemented. Legal compliance audit is conducted every year, and relevant improvement actions are followed up.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Safety Obligation and ASI Performance Standard Manual addresses worker rights to refuse unsafe work. Notification of this right is posted and communicated throughout the Entity. Workers are provided with a handbook and training to understand the hazards, health and safety associated risks and actions determined that are relevant to them, and right to refuse the unsafe work.
11.2 OH&S Management System	Conformance	The Entity holds valid ISO 45001:2018 Occupational Health and Safety Management System Certificate. A documented Occupational Health and Safety Management system including a ASI Performance Standard Manual is established and maintained.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a documented procedure for workers' consultation and participation in health & safety. Periodic health and safety committee meetings with workers and contractors are conducted. Workers are encouraged to report near-miss incidents, concerns or advices on health and safety issues to the Entity's Near-Miss Reporting system, and further review and actions are made by the Entity.
11.4 OH&S performance	Conformance	The Entity's Health & Safety Performance and Objective Management System is established and managed. Annual health and safety objectives using leading and lagging indicators comparing with peers are set, monitored, and evaluated.

Document Control and Version History

Revision	Date	Notes
0	26 October 2021	Initial Certification Audit – Full Certification
1	22 June 2022	Revised to transfer certification from Ulsan Aluminum Limited to Joint Venture partners Novelis and Kobelco due to change with ASI membership.