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# ASI CERTIFICATION PERFORMANCE STANDARD



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PRESENTED TO

# ULSAN ALUMINUM LTD

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.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

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.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Novelis Inc. and Kobe Steel, Ltd.
ENTITY NAME	Ulsan Aluminum Ltd
CERTIFICATION SCOPE	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.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (13 – 17 September 2021)</li><li>Surveillance Audit (3 – 5 April 2023)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>13 – 17 September 2021 (Initial Certification Audit)</li><li>3 – 5 April 2023 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>30 September 2021 (Initial Certification Audit)</li><li>19 April 2023 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (13 – 17 September 2021)</u></p> <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"><li>Aluminium Re-melting/Refining</li><li>Casthouses</li><li>Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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Surveillance Audit (3 – 5 April 2023)

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.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

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AUDIT  
OUTCOME

- Certification

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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

- 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

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

25 October 2024

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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 and maintained a formal policy, procedure and process to ensure compliance with Applicable Laws. 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 Applicable Law.
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. Annual training on the Entity's policies is provided to employees and Workers, and the Supplier Code of Conduct is signed and acknowledged by suppliers (internal and external suppliers). The Entity's Anti-Corruption Policy, Code of Conduct, Supplier Code of Conduct, Anti-Trust Policy, and Anti-Corruption Policy (in Korean) are accessible at: <a href="https://ulsanaluminum.com/home/vision/vision03.jsp">https://ulsanaluminum.com/home/vision/vision03.jsp</a>
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 is provided to its employees and Workers. Information on the Entity's Code of Conduct and Supplier Code of Conduct is accessible at: <a href="https://ulsanaluminum.com/home/vision/vision03.jsp">https://ulsanaluminum.com/home/vision/vision03.jsp</a>
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 on the Entity's intranet for communication with Workers. The Code of Conduct is accessible at: <a href="https://ulsanaluminum.com/home/vision/vision03.jsp">https://ulsanaluminum.com/home/vision/vision03.jsp</a> The Environment, Health and Safety Policy is accessible at: <a href="https://ulsanaluminum.com/home/vision/vision02.jsp">https://ulsanaluminum.com/home/vision/vision02.jsp</a>

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management demonstrates commitment to the implementation of policies, endorsement, and support to provide sufficient resources for regular review of policies to ensure compliance with the ASI Performance Standard requirements.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity's policies are available for internal and external Stakeholders through posting at the Entity's premises and publishing on the Entity's intranet and website.</p> <p>The Entity's Code of Conduct is accessible at: <a href="https://ulsanaluminum.com/home/vision/vision03.jsp">https://ulsanaluminum.com/home/vision/vision03.jsp</a></p> <p>The Environment, Health and Safety Policy is accessible at: <a href="https://ulsanaluminum.com/home/vision/vision02.jsp">https://ulsanaluminum.com/home/vision/vision02.jsp</a></p>
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 established and implemented an Environmental Management System and maintains a valid ISO 14001:2015 certification, available at: <a href="https://ulsanaluminum.com/home/vision/vision02.jsp">https://ulsanaluminum.com/home/vision/vision02.jsp</a>
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and maintained an integrated Social Management System manual to manage relevant social criteria in the ASI Performance Standard. The Entity has implemented and documented an Occupational Health and Safety Management System, and maintains a valid ISO 45001:2018 certificate, available at: <a href="https://ulsanaluminum.com/home/vision/vision02.jsp">https://ulsanaluminum.com/home/vision/vision02.jsp</a>
2.4 Responsible Sourcing	Conformance	<p>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: <a href="https://ulsanaluminum.com/home/vision/vision03.jsp">https://ulsanaluminum.com/home/vision/vision03.jsp</a></p> <p>The Entity has conducted supplier audits at major next tier suppliers and Contractors (internal and external) for improvement in its supply chain.</p>
2.5 Impact Assessments	Conformance	Risk assessment on environmental, social, health and safety, cultural and Human Rights, and governance is conducted by the Entity. Identified risks on social, environment, health and safety, and governance are

CRITERION	RATING	COMMENT
		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 Plans as an emergency response. The Entity's plans include collaboration with potentially affected Stakeholder groups such as Communities, Workers and 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 documented management procedure in case of mergers and acquisitions based on the requirement of the ASI Performance Standard. No such activity has happened or is planned since the Entity adopted the ASI Performance Standard.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a management procedure in case of closure, decommissioning and divestment based on the requirement of the ASI Performance Standard. No such activity has happened or is planned since the Entity adopted the ASI Performance Standard.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity's Sustainability Report is published and is publicly accessible at the Entity's website (in Korean): <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a> The Entity's main targets and performance on Social, Environment and Governance (ESG) aspects are addressed in the 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. No cases of fines raised by the relevant government agencies are addressed in the Entity's Sustainability Report, page 20 'Environment Results' section and page 25 'Community & Social' section: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a>
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 and the public government website: <a href="https://ulsanaluminum.com/home/intro/intro04.jsp">https://ulsanaluminum.com/home/intro/intro04.jsp</a> <a href="http://dart.fss.or.kr">http://dart.fss.or.kr</a> Certificates of full national/local tax payments to government are issued by government agencies.

CRITERION	RATING	COMMENT
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Grievances or complaints can be made via the available reporting mechanisms including hotline numbers, anonymous suggestion boxes, grievance handling council members and the Entity's website: <a href="https://ulsanaluminum.com/home/vision/vision03.jsp">https://ulsanaluminum.com/home/vision/vision03.jsp</a> A formal grievance register is maintained and there has been no case of external grievance, complaint or whistleblowing to date.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Environmental Life Cycle Assessments (LCA) covering final applications (Industrial Products, Automotive, and Can) for the Entity's Products are conducted by an external third party. The LCA report is cradle-to-grave and based on ISO 14040:2006 Environmental management, Life cycle assessment, Principles and framework.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	A summary report of the environmental LCA is accessible at: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a> The full LCA report can be provided upon request. There have been no requests to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	A summary report of the LCA is published in Korean, and is accessible at the Entity's website for public communication: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a>
4.2 Product design	Conformance	A direct product design and development function is not applicable to the Entity. 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 Aluminium Process Scrap is 100% collected and reused, as detailed in the Entity's Scrap Collection Standard and Sustainability Report, page 22, 'Environment Results' section: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a> Process scrap within closed-loop operations is collected from production facilities and recycled. The Entity has established a target of 100% scrap collection, recycling and/or re-use.

CRITERION	RATING	COMMENT
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.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	A commitment to increase the use of recycled scrap is established in the Entity's Strategy Plan. The Entity's strategy target is addressed in the Entity's Strategy Plan and RAR (RunARound) Scrap Management. The Entity has established recycling targets for using external scraps, and targets are monitored monthly.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	There are no local, or national collection and recycling systems for Aluminium scrap in Korea. The Entity has recycling systems in place and plans to enhance recycling rates in the production of the Entity's products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity is included in the Greenhouse Gases (GHG) Emissions Trading Scheme regulated by the Korean Government. Scope 1 and 2 GHG emissions and energy use by source are tracked, calculated, and documented. GHG emissions and energy use are verified by a third party verification body accredited by the government annually and final verification is made by the government. Results of GHG emissions and energy use are included in the Sustainability Report, page 22, 'Environment Results' section: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a> The Entity's GHG emissions and energy use are disclosed also on the public website of the National Greenhouse Gas Inventory and Research Center operated by the Ministry of Environment: <a href="http://www.gir.go.kr">www.gir.go.kr</a>
5.2 GHG emissions reductions	Conformance	GHG emissions reduction targets (Scope 1 and 2) are set by the Entity and the associated management plans to achieve the reduction targets are established and implemented. The GHG target and the GHG emissions and energy use (Scope 1 and 2) data are disclosed in the Sustainability Report, page 15, 'Sustainability Target' section and page 22, 'Environment Results' section: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
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 Entity's air emission facilities are approved by the Korean Government. The pollutants in the air emissions 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: <a href="https://www.env-info.kr">https://www.env-info.kr</a>
6.2 Discharges to Water	Conformance	The Entity operates wastewater treatment plants on site. The Entity has established water reduction targets and implemented plans to minimise adverse impacts. Water usage and wastewater discharge volumes are disclosed in the Sustainability Report, page 15, 'Sustainability Target' section and page 22, 'Environment Result': <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a> There has been no reported case of wastewater exceeding the legal limit or environmental accidents related to water discharge 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 has been conducted. An off-site risk assessment on Spills and Leakages that may contaminate air, water and soil has been conducted by an external third party. The results of the assessments determined the risk is low.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has established control plans to prevent Spills and Leakages, and relevant training is provided to Workers. The scope and responsibility for external communications are defined in the Instruction for Crisis Communication and Procedure for Emergency Response. The Entity undertakes weekly monitoring, and periodic soil and leakage tests are conducted by external organisations.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has established a documented system to report Spills and Leakages to the relevant government agency and other interested parties. The scope and responsibility for internal and external communication and disclosure are defined in the Procedure for Emergency Response and Emergency Contact List. There have been no reported cases of Spills and Leakages since 2001.

CRITERION	RATING	COMMENT
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity discloses the Impact Assessments of Spills and Leakages in the annual Sustainability Report, page 22, 'Environment Result' section: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a> There are no reported Spills in the report.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has established a landfill reduction target and implemented plans with consideration of the Waste Mitigation Hierarchy. General and Hazardous Wastes are transferred and disposed of by qualified external vendors and are monitored by the Entity.
6.5b Waste management and reporting (disclosure)	Conformance	The quantities and disposal of Hazardous Waste generated by the Entity are reported on a government website: <a href="http://www.env-info.kr">www.env-info.kr</a> The annual quantities of Hazardous and Non-Hazardous Waste and the associated disposal methods are presented in the Sustainability Report, page 22: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a>
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.
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.

CRITERION	RATING	COMMENT
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 formal processes to minimise the generation of Dross and maximise the recovery of aluminium by treatment of Dross and Dross residues. The Entity collects Dross (white dross) generated from the production process and transfers it to external dross processors for treatment. Following treatment, the Recycled Secondary Ingot (RSI) is returned to the Entity and Dross residues generated are recycled (as a raw material in cement) and not landfilled.
6.8b Dross (recycling)	Conformance	The Entity has a Metal Plan that establishes a target to minimise the generation of Dross and the target is monitored and controlled by the Entity. The Entity has conducted improvement activities to increase Dross recovery with the external processor.
6.8c Dross (review of alternatives)	Conformance	There is no landfilling of Dross residues. Dross residues are recycled by an external dross processor, and an annual review meeting on increasing recovery and finding alternative options for recycling is undertaken.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has developed a water flow diagram including withdrawal and use by source and type. The water source for production, canteen and office administration use is surface water. Discharge is to the local river following treatment by the Entity. Water usage and the generation of wastewater are monitored and controlled daily.
7.1b Water assessment (risk assessment)	Conformance	The Entity has undertaken an assessment to determine the water-related risks, which addresses operational, internal and external risks within their Area of Influence. The Environmental Aspect Assessment lists specific water-related risks. Due to the nature of the product, production processes and existing water management systems, the risk level has been assessed as low.
7.2a Water management (management plans)	Conformance	There are no identified Material water-related risks in the Entity's Area of Influence. However, the Entity has implemented a water reduction initiative and established an annual water saving target.

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Conformance	There are no identified Material water-related risks in the Entity's Area of Influence. However, as per the Entity's annual water saving target and water reduction initiative, the target and reduction plans are monitored monthly.
7.3 Disclosure of water usage and risks	Conformance	The Entity's water usage and water-related risks are disclosed on the government website: <a href="http://www.env-info.kr">www.env-info.kr</a> The Entity discloses this data in the Sustainability Report, page 22, 'Environment Result' section: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has developed an Environmental Aspect Analysis Procedure to assess risks to and impacts on biodiversity. An off-site risk assessment that addresses biodiversity risks has been conducted. The risks and impacts by the operation of the Entity within its Area of Influence were assessed as low. The outcome of the risk assessment is reported in the Sustainability Report, page 22: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a>
8.2a Biodiversity management (biodiversity action plans)	Conformance	The risk assessments determined the risks to and impacts on biodiversity from the operation of the Entity within its Area of Influence was assessed as low. However, the Entity has established control plans to mitigate biodiversity risks.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The risk assessments determined the risks to and impacts on biodiversity from the operation of the Entity within its Area of Influence was assessed as low. However, the Entity has established control plans to mitigate biodiversity risks.
8.2c Biodiversity management (reporting)	Conformance	The risk assessments determined the risks to and impacts on biodiversity from the operation of the Entity within its Area of Influence was assessed as low. The outcome of risk assessment is reported in the Sustainability Report, page 22: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a>
8.3 Alien Species	Conformance	Control plans to prevent the introduction of Alien Species have been implemented by the Entity. Inspection of imported containers is undertaken, and the wooden pallets are processed in a way to avoid the introduction of Alien Species. Fumigation and sterilisation for the purpose of insect and pest control within the Entity is performed periodically.

CRITERION	RATING	COMMENT
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 Entity commits to respect Human Rights in the Code of Conduct: <a href="https://ulsanaluminum.com/home/vision/vision03.jsp">https://ulsanaluminum.com/home/vision/vision03.jsp</a> The Code of Conduct is communicated and trained to all managers, Workers and Contractors.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established and implemented a Due Diligence process to address the identification and assessment of potential risks for Human Rights related issues. Compliance audits for in-house Contractors and suppliers are conducted to verify the effectiveness of controls.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has undertaken a formal risk assessment on labour, social aspects and Human Rights, as per the Risk Assessment of Labor, Ethics and Human Rights Procedure. A relevant corrective action process has been established. No issues causing adverse impacts to Human Rights were identified.
9.2 Women’s Rights	Conformance	The Entity is committed to respecting women’s rights, and a strategy and actions to improve gender diversity have been implemented. The legal requirements on women’s rights including maternity protection are identified and addressed in the Entity’s Employment Regulations. There have been no complaints received on women’s rights including on gender Discrimination.
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.

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Conformance	The Entity undertook a review of the official government website (Land Registration Map of the Land Use and Development Information Service) and 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.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable, as there was no Resettlement necessary.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established a commitment respecting the legal and customary rights and interests of Local Communities. The Entity has conducted a relevant risk assessment and addressed control plans accordingly. The Entity's community support activities are disclosed on the website: <a href="https://ulsanaluminum.com/home/vision/vision05.jsp">https://ulsanaluminum.com/home/vision/vision05.jsp</a> and in the Sustainability Report, page 26, 'Social Responsibility' section: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a>
9.7b Local Communities (impacts)	Conformance	The Entity has conducted a risk assessment that addresses the Local Community's rights, which determined adverse impacts as limited. No complaints from the Local Communities have been received to date.
9.7c Local Communities (livelihoods)	Conformance	The Entity supports Local Communities with charity and support activities, as stated on the website: <a href="https://ulsanaluminum.com/home/vision/vision05.jsp">https://ulsanaluminum.com/home/vision/vision05.jsp</a> and in the Sustainability Report, page 26, 'Social Responsibility' section: <a href="https://ulsanaluminum.com/home/vision/vision01.jsp">https://ulsanaluminum.com/home/vision/vision01.jsp</a>
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented formal policies including the Conflict Mineral Declaration and Trade Restriction Compliance Policy to ensure it does not support or use conflict minerals. A formal risk assessment on conflict minerals 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	The Entity's security services are outsourced to a security Contractor who is required to comply with the Entity's Supplier Code of Conduct. Review of the risk assessment, site observation and worker interview confirmed there is no restriction on the

CRITERION	RATING	COMMENT
		freedom of movement. No grievances 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 has implemented a Code of Conduct that commits to respecting the Freedom of Association. A Trade Union is formed, and a formal Collective Bargaining Agreement (CBA) is in place. Union representatives are elected by Workers in an anonymous, direct and confidential manner. Workers are free to join, or not 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 CBA has been agreed between the Labour Union and the Entity, and it is declared to the government. No complaints or negligence of Collective Bargaining rights have been received to date.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as there are no restrictions on the right to Freedom of Association and Collective Bargaining as per the Constitution of the Republic of Korea.
10.2a Child Labour (minimum age)	Conformance	The Entity's Code of Conduct prohibits the use of Child Labour under 15 years old. The Entity has established systems to monitor and verify a Worker's age during the hiring process. There is no history, nor current use of Child Labour or young Workers (under 18 years) at the Entity.
10.2b Child Labour (hazardous)	Conformance	The Entity's hiring regulations state that the Entity does not allow young Workers to work in hazardous working conditions, and the Entity has identified hazardous and restricted jobs for young Workers (under 18 years). There is no history, nor current use of Child Labour or young Workers at the Entity.
10.2c Child Labour (worst forms)	Conformance	The Entity and the Entity's Contractors in the Entity's premises are committed to the prohibition of the use or support of Child Labour. The Entity's Code of Conduct and Supplier Code of Conduct address 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)	Conformance	The Entity is committed to the prohibition of Forced Labour, slavery and Human Trafficking, which is addressed in the Code of Conduct and Supplier Code of Conduct. All Workers are hired directly

CRITERION	RATING	COMMENT
		through the Entity and external recruitment agencies are not used. No engagement or support of Human Trafficking was found.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct address the prohibition of Forced Labour. Worker interviews and review of the Entity's Employment Regulation and labour contracts confirm Workers are not required to pay any form of fee or deposit.
10.3c Forced Labour (migrant workers)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct address the prohibition of Forced Labour. There is no history or current use of foreign Migrant Workers 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 address the prohibition of Forced Labour. Review of the Entity's Employment Regulation and labour contracts confirm no terms of Debt Bondage were found. There are no practices of Debt Bondage found in the Entity.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct address the 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 or retained by the Entity during employment. The Entity retains only copies of Workers' original documents.
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 is provided in advance. Workers interviewed stated that they can terminate their employment with a specific notice period in advance without any penalty. No complaints on the restriction of freedom of termination have been received to date.
10.4 Non-Discrimination	Conformance	The Entity's Code of Conduct and Supplier Code of Conduct address the prohibition of any type 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 stated there is no Discrimination within the Entity and no



CRITERION	RATING	COMMENT
		grievance or complaint regarding Discrimination has 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 have 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.
10.6 Disciplinary practices	Conformance	The prohibition of inhumane treatment has been committed through the Entity's Code of Conduct and Employment Regulation. Disciplinary regulations and practices comply with the relevant legal regulation (Labour Standard Act). The Entity maintains a formal disciplinary register 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. Based on a review of payslips, 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)	Minor Non-Conformance	Details on Workers' payments are documented in the Entity's Wage List and payment is made 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 payments are made in a timely manner and there has been no delay in payments. However, one minor non-conformance is issued regarding mandatory information that has not been included in the payslips of an in-house subcontractor.
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	The Entity has established an Occupational Health and Safety (OH&S) Policy, which is reviewed periodically during annual management review

CRITERION	RATING	COMMENT
		meetings. The policy is posted within the Entity and is available for Stakeholders: <a href="https://ulsanaluminum.com/home/vision/vision02.jsp">https://ulsanaluminum.com/home/vision/vision02.jsp</a>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OH&S Policy is applied to all Workers and Visitors, and their controls are under the Entity's OH&S Management System. Workers and responsible management individuals are regularly trained on health and safety aspects and visitors undertake safety training prior to entering the Entity's premises.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's OH&S Policy includes a commitment to comply with the legal and other requirements. The Entity's Management System requires the identification of all applicable legal and other requirements and the evaluation of legal compliance. Legal and internal compliance audits are conducted annually, and relevant improvement actions are implemented.
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 states the Workers' right to refuse unsafe work. The Workers' right is posted and communicated throughout the Entity. Workers are provided with regular health and safety training to understand hazards, health and safety associated risks and further mitigation actions relevant to them and rights to refuse unsafe work. All Workers interviewed confirmed they are aware of their rights to refuse unsafe work.
11.2 OH&S Management System	Conformance	The Entity has a documented and implemented OH&S Management System, including an ASI Performance Standard Manual. The Entity holds a valid ISO 45001:2018 Occupational Health and Safety Management System certificate.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a formal documented procedure for Workers' consultation and participation in health and safety aspects. Periodic Health and Safety Committee meetings with Workers and Contractors are conducted. Workers are encouraged to report near-miss incidents, concerns or advice on health and safety issues in the Entity's Near-Miss Reporting system, and further review and improvement actions are undertaken 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

CRITERION	RATING	COMMENT
		leading and lagging indicators to compare performance with peers are established, 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.
2	9 May 2023	Surveillance Audit