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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# RIO TINTO

CERTIFICATE  
NUMBER

1

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

BNQ

DATE OF ISSUE

16 MARCH 2018

DATE OF EXPIRY

15 MARCH 2021

CERTIFIED SINCE

16 MARCH 2018

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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](http://www.aluminium-stewardship.org)**

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CERTIFICATION SCOPE

Vaudreuil Alumina Refinery (Saguenay QC, Canada), Alma Smelter (Alma QC, Canada), AP-60 Smelter (Saguenay QC, Canada), Arvida Smelter (Saguenay QC, Canada), Grande-Baie Smelter (Saguenay QC, Canada), Laterriere Smelter (Saguenay QC, Canada), Beauharnois (Beauharnois QC, Canada), Dubuc / PLS (Saguenay QC, Canada), Spent Pot Lining Treatment Plant (Saguenay QC, Canada), Quebec Power Operations (Saguenay QC, Canada), IPSF (Port and Rails) (Saguenay QC, Canada) and Headquarters (Saguenay QC, Canada).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME Rio Tinto

ENTITY NAME Rio Tinto Aluminium (RTA) Québec, Canada

CERTIFICATION  
SCOPE

- Vaudreuil Alumina Refinery (Saguenay QC, Canada)
- Alma Smelter (Alma QC, Canada)
- AP-60 Smelter (Saguenay QC, Canada)
- Arvida Smelter (Saguenay QC, Canada)
- Grande-Baie Smelter (Saguenay QC, Canada)
- Laterriere Smelter (Saguenay QC, Canada)
- Beauharnois (Beauharnois QC, Canada)
- Dubuc / PLS (Saguenay QC, Canada)
- Spent Pot Lining Treatment Plant (Saguenay QC, Canada)
- Quebec Power Operations (Saguenay QC, Canada)
- IPSF (Port and Rails) (Saguenay QC, Canada)
- Headquarters (Saguenay QC, Canada)

SUPPLY CHAIN  
ACTIVITIES

- Alumina Refining
- Aluminium Smelting
- Casthouses
- Semi-Fabrication
- Aluminium Re-melting / Refining

ASI STANDARD • Performance Standard V2

AUDIT TYPE • Certification Audit

AUDIT FIRM BNQ

AUDIT DATE 9-26 January 2018

AUDIT REPORT  
SUBMISSION 7 March 2018

AUDIT SCOPE	<p>Facilities included in the audit scope:</p> <ul style="list-style-type: none"> <li>● Headquarters in Saguenay and Montreal</li> <li>● Vaudreuil Alumina Refinery</li> <li>● AP-60 Smelter, Grande-Baie Smelter and Laterrière Smelter</li> <li>● Dubuc/PLS</li> <li>● Quebec power operations</li> <li>● Port &amp; rail facilities</li> <li>● SPL treatment facility (desktop review)</li> </ul> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"> <li>● Alumina Refining</li> <li>● Aluminium Smelting</li> <li>● Casthouses</li> <li>● Semi-Fabrication</li> <li>● Aluminium Re-melting / Refining</li> </ul> <p>All applicable criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"> <li>● Certification</li> </ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li> <li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li> <li><input checked="" type="checkbox"/> 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.</li> <li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul>
CERTIFICATION PERIOD	16 March 2018 – 15 March 2021
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	14 September 2019
CERTIFICATION NUMBER	1

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the legal compliance requirements.</p> <p>The Entity has implemented processes that allow adequate awareness of legal requirements and to ensure compliance with applicable laws and regulations.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the anti-corruption requirements.</p> <p>The Entity has established adequate anti-corruption measures which are approved by the highest management level and implemented at all relevant corporate levels.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the code of conduct requirements. The Entity has implemented a written organisational code of conduct that includes relevant principles for environmental, social and governance performance.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has developed and implemented systems, procedures and processes that conform to the environmental, social, and governance policies requirements.</p> <p>The Entity has policies that include statements of principles and intention which support achievement of the requirements in the ASI Standard.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has endorsement and support from senior management in order to provide sufficient resources for regular review of policies. Senior management endorses, support through provision of resources and regularly review the policies.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity communicates policies internally and externally which conform to the requirement.</p> <p>The Entity's policies are available to external and internal stakeholders to raise awareness of the company's commitments.</p>
2.2 Leadership	Conformance	<p>The Entity has nominated a person at senior</p>

CRITERION	RATING	COMMENT
		management level and ensured sufficient human and material resources to support the implementation of the Standard. A Senior Manager is appointed as ASI Manager for Quebec's facilities.
2.3a Environmental and Social Management Systems (environmental)	Conformance	RTA is ISO 14001 certified. All Quebec facilities targeted by the ASI-PS certification are already certified to ISO 14001 by the BNQ and ASI recognizes ISO 14001 as responding to criterion 2.3a.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the social management systems requirements. The Workplace Internet Portal provides information related to this criterion. The Health, Safety, Environment and Communities (HSEC) Standards are implemented and meet these requirements.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Entity has implemented a Supplier Code of Conduct that meets the criterion.
2.5 Impact Assessments	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the impact assessments requirements. The Entity's ISO 14001 certification and the Province of Quebec's strict laws and regulations provide a framework to meet the risk impact assessment requirement. The Entity also goes beyond the legal requirement and as required, performs voluntary impact assessments.
2.6 Emergency Response Plan	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the emergency response plan requirements. RTA is currently certified ISO 14001:2015. Certification to ISO 14001 is current for the RTA Certification Scope.
2.7 Mergers and Acquisitions	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the mergers and acquisitions requirements. The Entity uses the Business Evaluation Standard and deploys the due diligence processes.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the closure, decommissioning and divestment requirements. The Entity's processes were implemented for the closure, demolition, environmental rehabilitation and compensation project.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the sustainability reporting requirements. The Entity adequately communicates its sustainability performance to relevant stakeholders in its annual Provincial sustainability report.
3.2 Non-compliance and liabilities	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the non-compliance and liabilities requirements. The Entity provides information on non-compliances and liabilities in its annual sustainability report.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these anti-corruption requirements. This requirement is covered, through Transparency and Anti-corruption policies' deployment.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certificate scope: No bauxite mine in this scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the stakeholder complaints, grievances and requests for information requirements. The Entity's management system tracks requests and complaints from stakeholders and has an appropriate resolution mechanism.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these life cycle assessment (LCA) requirements. The Entity evaluates life cycle impacts of its major product line.
4.1b Environmental Life Cycle	Conformance	The Entity has developed and implemented

CRITERION	RATING	COMMENT
Assessment (cradle to gate)		<p>policies, systems, procedures and processes that conform to these LCA information requirements.</p> <p>The Entity's LCA data are available upon request.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these LCA communication requirements.</p> <p>The Entity's LCA data are available upon request.</p>
4.2 Product design	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the product design requirements.</p> <p>Documentation related to product design includes resource efficiency, optimization of utilization phase, recyclability and life cycle impacts of the end product.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these material stewardship requirements.</p> <p>The Entity strives to minimize the generation of aluminum scraps and 100% of the generated scrap is recycled or re-used.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these material stewardship requirements.</p> <p>The Entity has an aluminum recycling strategy.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these recycling strategy requirements.</p> <p>The Entity has an aluminum recycling strategy.</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these material stewardship requirements.</p> <p>The Entity has an aluminum recycling strategy.</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	<p>The consolidated GHG material emissions of aluminum smelters (in absolute and in intensity) of the Province of Quebec (Canada) as well as the energy intensity consumed by aluminum smelters in the Province of Quebec have been disclosed publicly on an annual basis (in the Sustainability Report). However,</p>

CRITERION	RATING	COMMENT
		the Entity did not publicly disclose the detail of each material sources of GHG emissions and all energy use by source for these aluminum smelters and other Québec facilities (such as the Vaudreuil Alumina Refinery).
5.2 GHG emissions reductions	Minor Non-Conformance	The Entity did not publish its time-bound GHG emissions reduction targets for the Province of Québec (Canada). These objectives are indirectly known from the Quebec Cap-and-trade-system for emission allowances.
5.3a Aluminium Smelting (management system)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these GHG Management System requirements. The Entity's direct GHG emissions are annually verified under the Quebec Carbon Trade. GHG Emissions are approximately 3 to 4 times lower than 8 tonnes of CO <sub>2</sub> eq.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these GHG emission requirements. The Entity's direct GHG emissions are annually verified under the Quebec Carbon Trade.
5.3c Aluminium Smelting (after 2020)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these GHG emission requirements. The Entity's direct GHG emissions are annually verified under the Quebec Carbon Trade. The GHG Emissions will be approximately 3 to 4 times lower than 8 tonnes of CO <sub>2</sub> eq.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the emissions to air requirements. The Entity's air emissions summary is included in the Annual Report on Sustainable Development.
6.2 Discharges to Water	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the discharges to water requirements. The Entity is ISO 14001 certified and carries out EHS legal / regulatory compliance for this criterion.
6.3a Assessment and Management of	Conformance	The Entity has developed and implemented



CRITERION	RATING	COMMENT
Spills and Leakage (assessment)		policies, systems, procedures and processes that conform to these requirements. The Entity has an exhaustive spill and leakage action plan in place.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these requirements. The Entity has an exhaustive spill and leakage action plan in place.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these spills reporting requirements. The Entity reports spills.
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	Major spills are reported, if any. However, there is no evidence that the Entity publicly disclose the information on the impacts assessments of the spills and the remediation actions on an annual basis. These details are not included in the Annual Sustainability Report for the Province of Québec (Canada), neither disclosed on the website.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these waste management and reporting requirements. The Entity has a waste management action plan.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these waste management and reporting requirements. The Entity reports on waste management in its annual sustainability report.
6.6a Bauxite Residue (storage construction)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these bauxite residue requirements. The Entity's bauxite residue storage sites are operated in accordance with legal and regulatory guidelines.
6.6b Bauxite Residue (integrity checks and controls)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these bauxite residue requirements. Regular third party inspections are carried out at bauxite residue storage sites.
6.6c Bauxite Residue (water discharge)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these bauxite residue

CRITERION	RATING	COMMENT
		<p>requirements.</p> <p>Regular third party inspections are carried out at bauxite residue storage sites.</p>
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these bauxite residue requirements.</p> <p>Discharge water is reused in the Entity's manufacturing processes.</p>
6.6e Bauxite Residue (start of the art technologies)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these bauxite residue requirements.</p> <p>The Entity is in the process of building a new filtration plant.</p>
6.6f Bauxite Residue (remediation)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these bauxite residue requirements.</p> <p>The Entity's bauxite residue disposal site project includes a plan for the closure and rehabilitation of the current site.</p>
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Spent Pot Lining (SPL) requirements. SPL inventory are maintained and comply with the Entity's permit delivered by the Province of Québec's Ministry of the Environment.</p> <p>The Entity has a SPL treatment plants that optimise carbon recovery.</p>
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Spent Pot Lining (SPL) requirements. The Entity has a SPL treatment plants that optimise carbon recovery.</p>
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Spent Pot Lining (SPL) requirements.</p> <p>The Entity has a SPL treatment plants that optimise carbon recovery. Only treated /neutralised SPL residues can be landfilled.</p>
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Spent Pot Lining (SPL) requirements.</p> <p>SPL treatment process is reviewed annually and research projects are underway to continually improve the performance of the</p>

CRITERION	RATING	COMMENT
		process.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these Spent Pot Lining (SPL) requirements. The Entity's untreated SPL are stored in closed warehouses using closed and controlled water drainage systems.
6.8a Dross (recovery)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these dross requirements. Dross generated by the Entity is processed to maximise aluminum recovery.
6.8b Dross (recycling)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these dross requirements. The Entity works to help maximise the recycling of treated dross residues.
6.8c Dross (review of alternatives)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these dross requirements. The process is reviewed annually and research projects are underway to continually improve the performance of the process and reduce dross residues.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these water assessment requirements. The Entity tracks water consumption annually.
7.1b Water assessment (risk assessment)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these water assessment requirements. The Entity has performed extensive studies and impact assessments related to water-related risks. Proper mitigation measures were implemented.
7.2a Water management (management plans)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these water management requirements. The Entity has a water management plan in place which is updated every year.
7.2b Water management (monitoring)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes

CRITERION	RATING	COMMENT
		that conform to the monitoring of effectiveness of plans requirements. The Entity monitors periodically the effectiveness of water management plans.
7.3 Disclosure of water usage and risks	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these disclosures of water usage and risks requirements. The Entity discloses water usages and risks in its sustainable development report.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the biodiversity assessment requirements. The Entity has performed biodiversity risk assessments.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these Biodiversity management requirements. The Entity has implemented an action plan to address biodiversity risks.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these Biodiversity management requirements. Stakeholders were involved in the biodiversity action plan.
8.2c Biodiversity management (reporting)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these Biodiversity management requirements. The Entity's Biodiversity management outcomes are shared.
8.3 Alien Species	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the alien species requirements. The Entity preventive action plans comply with the National strict regulations.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	There is no bauxite mine in Quebec and in this Certification Scope
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	There is no bauxite mine in Quebec and in this Certification Scope
8.5a Mine rehabilitation (best available techniques)	Not Applicable	There is no bauxite mine in Quebec and in this Certification Scope

CRITERION	RATING	COMMENT
8.5b Mine rehabilitation (financial provisions)	Not Applicable	There is no bauxite mine in Quebec and in this Certification Scope
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these Human Rights Due Diligence requirements. Policies that include commitments to respect Human Rights are available, integrated into activities and implemented. The due diligence process is implemented.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these Human Rights Due Diligence requirements. A Human Rights due diligence process is set out in the Policies and is based on risk management. The due diligence process is implemented.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to these Human Rights Due Diligence requirements. The Entity has an Ethics and Integrity group which provides advice and receives concerns and complaints related to Human Rights. Issues and progress monitoring is done by senior management
9.2 Women's Rights	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the women's rights requirements. Women's rights are highly valued and respected in the Province of Québec and this culture is also broadly implemented in the Entity.
9.3 Indigenous Peoples	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the Indigenous people's requirements. The Entity applies its Code of Conduct (The Way We Work) and Community Management Guides (Why Human Rights Matters, Why Agreement Matters and Why cultural heritage matters) to provide framework to respect Indigenous Peoples' rights.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the Free Prior and Informed Consent requirements.

CRITERION	RATING	COMMENT
		A Partnership and Mutual Respect Agreement with the First Nation community is implemented.
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the cultural and sacred heritage requirements.</p> <p>A Partnership and Mutual Respect Agreement with the First Nation community is implemented.</p>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Resettlement's requirements.</p> <p>The Entity's footprint on the Province of Quebec's territory has not changed significantly for decades and there is no plan to do so in the upcoming years.</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Resettlement's requirements.</p> <p>The Entity's footprint on the Province of Quebec's territory has not changed significantly for decades and there is no plan to do so in the upcoming years.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Local Communities requirements.</p> <p>The Entity is maintaining Good Neighborhood Committees to exchange information, opinions and develop opportunities to respect and support livelihoods with a constructive approach.</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Local Communities requirements.</p> <p>The Entity is maintaining Good Neighborhood Committees to exchange information, opinions and develop opportunities to respect and support livelihoods with a constructive approach.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Local Communities requirements.</p> <p>The Entity is maintaining Good Neighborhood Committees to exchange information, opinions and develop opportunities to respect and</p>

CRITERION	RATING	COMMENT
		support livelihoods with a constructive approach.
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the conflict-affected and high-risk areas requirements.</p> <p>The Entity has performed security risk assessments and management plans for each of its locations. The Province of Quebec represents a very low-risk area and is not affected by conflict.</p>
9.9 Security practice	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the security practice requirements.</p> <p>Security management and supervisory staff have been trained on the Entity's Risk Management Plan. The security practices respect Human Rights.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Freedom of Association and Right to Collective Bargaining requirements.</p> <p>Workers have the freedom of association without interference from the Entity.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Freedom of Association and Right to Collective Bargaining requirements.</p> <p>Concluded collective agreements are implemented by the Entity.</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Freedom of Association and Right to Collective Bargaining requirements.</p> <p>Rights of association and workers are supported by the legislation.</p>
10.2a Child Labour (minimum age)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the basic minimum working age requirements.</p> <p>Policies and laws are in place to avoid hire of child labour.</p>
10.2b Child Labour (hazardous)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes</p>

CRITERION	RATING	COMMENT
		<p>that conform to these Child Labour requirements.</p> <p>Policies and laws are in place to avoid hire of child labour..</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Child Labour requirements.</p> <p>The Entity has an Ethics and Integrity group that provides the framework for compliance to this criterion.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes to avoid any Forced Labour that are in line with the requirements.</p> <p>Policies and laws are in place to avoid human trafficking that can lead to forced labour, and that in any of its forms, at the level of the company and its subcontractors.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes to avoid any Forced Labour that are in line with the requirements.</p> <p>Policies and laws are in place to avoid any form of deposit, recruitment fees through employment or recruitment.</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes to avoid any Forced Labour that are in line with the requirements.</p> <p>Policies and laws are in place to avoid any form of deposit or guarantee payments from migrant workers.</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes to avoid any Forced Labour that are in line with the requirements.</p> <p>Policies and laws are in place to avoid workers held in debt bondage to pay off a debt.</p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes to avoid any Forced Labour that are in line with the requirements.</p> <p>Workers have freedom of movement in the workplace or on the site except where health and safety special precaution or training is required.</p>
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes to avoid any Forced Labour that are in line with</p>



CRITERION	RATING	COMMENT
		<p>the requirements.</p> <p>Policies and laws are in place to avoid the company keeping original copies of workers' IDs, work permits, travel documents or training certificates.</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes to avoid any Forced Labour that are in line with the requirements. Policies and laws are in place to avoid situations in which workers cannot leave their jobs without notice and penalty.</p>
10.4 Non-Discrimination	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the non-discrimination requirements.</p> <p>In the event that cases of discrimination are identified, the Ethics and Integrity Group is the primary contact for providing advice and receiving complaints or concerns related to discrimination.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the communication and engagement requirements.</p> <p>The Entity has several means of communication to ensure open communication with workers and their representatives (e.g. unions, delegates), regarding working conditions and any problems related to the workplace.</p>
10.6 Disciplinary practices	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the disciplinary practices requirements.</p> <p>The Entity has policies and laws in place to avoid unreasonable practices in the workplace to apply disciplinary measures.</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the remuneration requirements.</p> <p>Several policies, Processes and Procedures support the wages and benefits of workers.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these remuneration requirements.</p> <p>Policies and laws are in place to avoid that payments are delayed, deferred or withheld.</p>
10.8 Working Time	Conformance	<p>The Entity has developed and implemented</p>

CRITERION	RATING	COMMENT
		<p>policies, systems, procedures and processes that conform to the working time requirements. Applicable laws and collective agreements provide the framework to ensure that workers are not forced to work beyond the number of hours allowed.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Occupational Health and Safety (OH&amp;S) Policy requirements. The Entity has a written and implemented health and safety policy.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Occupational Health and Safety (OH&amp;S) Policy requirements. The Entity's policy is easily available to workers.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Occupational Health and Safety (OH&amp;S) Policy requirements. The Entity has a commitment to the prevention of accidents, compliance with legal requirements and beyond, achieving world class performance, creating a strong safety culture.</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Occupational Health and Safety (OH&amp;S) Policy requirements. The Entity's Health, Safety, Environment and Community (HSEC) Policy refers to the right of workers to understand the hazards and the safe practices for their work, and also includes the duty to refuse or stop any unsafe work.</p>
11.2 OH&S Management System	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the OH&amp;S management system requirements. The Entity's OH&amp;S management system is well implemented.</p>
11.3 Employee engagement on health and safety	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the employee engagement on health and safety requirements. Joint Health &amp; Safety committees are in place at each site to improve the OH&amp;S performance and address issues, including worker's concerns and suggestions.</p>

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the OH&amp;S performance requirements.</p> <p>The Entity's OH&amp;S performance indicators are continuously tracked continuously and reported on a monthly basis for benchmarking purposes.</p>

**Document Control and Version History**

Revision	Date	Notes
0	16 March 2018	Issued
1	13 April 2018	Comments section updated by audit firm