
ASI CERTIFICATION PERFORMANCE STANDARD



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

CERTIFICATION SCOPE

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

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME Rio Tinto

ENTITY NAME Rio Tinto Aluminium (RTA) 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)
- Kitimat Smelter (Kitimat BC, Canada)
- Kemano Power Operations (Kitimat BC, 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

- Surveillance Audit – Scope Change

AUDIT FIRM BNQ

AUDIT DATE ● 9-26 January 2018 (Certification Audit)

- 4 September 2018 – 4 October 2018 (Surveillance Audit – Scope Change)

AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"> ● 7 March 2018 (Certification Audit) ● 26 November 2018 (Surveillance Audit – Scope Change)
AUDIT SCOPE	<p>Facilities included in the audit scope:</p> <ul style="list-style-type: none"> ● Headquarters in Saguenay and Montreal ● Vaudreuil Alumina Refinery ● AP-60 Smelter, Grande-Baie Smelter, Kitimat and Laterrière Smelters ● Dubuc/PLS ● Quebec power operations ● Kemano Power Operations ● Port & rail facilities ● SPL Treatment Plant. <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"> ● Alumina Refining ● Aluminium Smelting ● Casthouses ● Semi-Fabrication ● Aluminium Re-melting / Refining <p>All applicable 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	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <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. <input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. <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. <input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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> <p>In the province of British Columbia (BC), Canada, the Kitimat smelter (including its port facilities) and the Kemano Power Operation, hereafter BC Works deploy the following processes / means:</p> <ul style="list-style-type: none"> • ISO 14001, Environment, Occupational Health and Safety (EHS) legal / regulatory compliance checks • Process Identification and register legal requirement • Process Verification compliance legal requirements • Pollution Prevention (P2) Multimedia Environmental Permit (P2 Permit) monitoring and reporting processes.
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> <p>In conclusion, a documented and mature program is established to mitigate the risks of anti-corruption, including providing training, formal approval procedures and increased monitoring of reported situations.</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.</p> <p>The Entity has implemented a written organisational code of conduct that includes relevant principles for environmental, social and governance performance. For example, the Ethics and Integrity Group is the primary contact for providing advice and receiving complaints or concerns regarding the Code of Conduct. A reporting and denunciation mechanism is available for all employees.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and	Conformance	The Entity has developed and implemented

CRITERION	RATING	COMMENT
Governance Policy (implement and maintain)		<p>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 Aluminium Stewardship Initiative (ASI) Performance 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> <p>Currently, Rio Tinto Aluminium's (RTA)'s Principal advisor – Environment, Atlantic Operations, is the ASI respondent for the ASI Member and the Entity.</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> <p>The polices are adequately communicated.</p>
2.2 Leadership	Conformance	<p>The Entity has nominated a person at senior management level and ensured sufficient human and material resources to support the implementation of the Standard.</p> <p>Currently, Rio Tinto Aluminium's (RTA)'s Principal advisor – Environment, Atlantic Operations, is the ASI respondent for the ASI Member and the Entity.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>RTA is ISO 14001 certified.</p> <ul style="list-style-type: none"> • 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. • BC Works facilities targeted by the ASI-Performance Standard (PS) certification are already certified to the ISO 14001 standard by the Bureau de normalisation du Québec (BNQ) and ASI recognises ISO 14001 as responding to Article 2.3a.
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the social management systems requirements.</p> <p>The Workplace Internet Portal provides information related to this criterion. The Health,</p>

CRITERION	RATING	COMMENT
		<p>Safety, Environment and Communities (HSEC) Standards are implemented and meet these requirements.</p> <p>In BC, "Community and Social Performance" standard are also well implemented and monitored. According to Rio Tinto Website and the BNQ interviews with BC Works Managers, "the Kitimat Public Advisory Committee (KPAC) was implemented close to twenty years ago to ensure that community voices are brought to the table and considered throughout our operations in Kitimat-Kemano. While the size of the KPAC is limited to ensure effective collaboration, the intent of the membership is to ensure the wider community has a voice. Community members are encouraged with questions or concerns to reach out to KPAC members, who will make sure their voice is heard by Rio Tinto.</p> <p>For the Nechako Reservoir (related to the Kemano Hydro-Power Operation), a Water Engagement Initiative is in deployment in the watershed and it helps maintain a constant dialogue with stakeholders that are concerned or affected by the Water Management Plan or the implementation of the Kemano T2 Project (the improvement/completion of a second water tunnel)</p> <p>For the Occupational Health and safety (OHS) parts, see the comments presented in Principle 11.</p>
2.4 Responsible Sourcing	Conformance	<p>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.</p> <p>Contractors working in Rio Tinto's facilities or providing Rio Tinto are regularly monitored and communicated through the deployment of the Contractor Management System. The Engineering/Contractor Management Team is dedicated to deploying the Contractor Management System.</p>
2.5 Impact Assessments	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the impact assessments requirements.</p> <p>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.</p>
2.6 Emergency Response Plan	Conformance	The Entity has developed and implemented

CRITERION	RATING	COMMENT
		<p>policies, systems, procedures and processes that conform to the emergency response plan requirements.</p> <p>RTA is currently certified ISO 14001:2015. Certification to ISO 14001 is current for the RTA Certification Scope.</p> <p>The Entity's Business Resilience and Recovery Plan (BRRP) is well implemented and maintained to prevent and deal with emergency response. Environmental Effects Monitoring plans (EEM Plans) are well implemented to monitor potential impacts. Drills are performed and debriefing from real events help improve the effectiveness of the BRRP for the Entity and for Rio Tinto.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the mergers and acquisitions requirements.</p> <p>The Entity uses the Business Evaluation Standard and deploys the due diligence processes.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the closure, decommissioning and divestment requirements.</p> <p>The Entity's processes were implemented for the closure, demolition, environmental rehabilitation and compensation project.</p> <p>BC Works put in place a complete closure, Decommissioning and Divestment process. Furthermore, all decommissioning plans must be approved by the provincial authorities. Projects are managed by a dedicated Project Team that report evolution of works to the management team during weekly meetings.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the sustainability reporting requirements.</p> <p>The Entity adequately communicates its sustainability performance to relevant stakeholders in its annual Provincial sustainability report.</p> <p>BC Works has published in August 2018 their 2017 Sustainability report. A one-page summary (the 2017 Scorecard) was posted in Facebook and Rio Tinto website (https://www.riotinto.com/canada/bc-works-4818.aspx) and was also sent to all employees.</p>

CRITERION	RATING	COMMENT
		<p>In addition, BC Works also produces an Annual Environmental Report since 2008 to share environmental performance with the stakeholders. The report is submitted to the provincial government and made available to the public through the Rio Tinto website (https://www.riotinto.com/canada/bc-works-4818.aspx) and the Kitimat Public Advisory Committee (KPAC).</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the non-compliance and liabilities requirements.</p> <p>The Entity provides information on non-compliances and liabilities in its annual sustainability report.</p> <p>The BC Works 2017 Annual Environmental Report details all the non-compliance issued in 2017, with the corrective actions.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>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.</p> <p>Rio Tinto deploys a Tax Department strictly supervised by continuous training and by several processes.</p> <p>Payments to governments are independently verified by independent accounting firms.</p>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	<p>This criterion is not applicable to the Entity's Certification Scope. No bauxite mine in this scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the stakeholder complaints, grievances and requests for information requirements.</p> <p>The Entity's management system tracks requests and complaints from stakeholders and has an appropriate resolution mechanism.</p> <p>BC Works procedure on complaints is well deployed:</p> <ul style="list-style-type: none"> • Kitimat Public Advisory Committee (KPAC) and the Community Office regularly advise about the means for the communities to provide questions, comments or concerns about the Kitimat smelter operation/facilities to BC Works. • The Water Engagement Initiative (WEI)

CRITERION	RATING	COMMENT
		<p>provides a formal forum for every concerned stakeholders of the Nechako Watershed/Reservoir (Kemano Power Operations) to communicate and monitor complaints, grievances and requests for information.</p> <p>Stakeholders Complaints, Grievances and Requests are monitored and managed.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these life cycle assessment (LCA) requirements.</p> <p>The Entity evaluates life cycle impacts of its major product line.</p> <p>An environmental life cycle assessment (LCA) of aluminum ingots produced by Rio Tinto Alcan was conducted by Quantis in 2014 (Quantis is an internationally renowned firm in LCA).</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity has developed and implemented 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 utilisation 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 if not contaminated.</p> <p>The BC site plans and monitors closely inventory targets to prevent resource waste.</p> <p>The recovery rate is constantly monitored and reported weekly to managers.</p>

CRITERION	RATING	COMMENT
		<p>The Kitimat Casthouse is ISO 9001:2015 certified.</p> <p>BC Casthouse recycles other RTA scraps. The RTA Control Tower helps optimise scrap recycling for the overall Entity in Canada.</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> <p>The BC site separates scrap alloys and recycles them by family and grade in order to minimize waste. BC Casthouse recycles other RTA's sites scraps. The RTA Control Tower helps optimize scrap recycling for the overall Entity in Canada.</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 and is involved in recycling activities at the local, regional and national levels.</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 recycling strategy requirements.</p> <p>The Entity has an aluminum recycling strategy and is involved in recycling activities at the local, regional and national levels.</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	<p>For the Quebec Works:</p> <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, 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).</p> <p>Note that the above Minor Non-Conformance does not apply to the BC Works. BC Works accounts for and publicly discloses material Greenhouse Gas (GHG) emissions and energy use by source on an annual basis.</p>
5.2 GHG emissions reductions		For the Quebec Works:

CRITERION	RATING	COMMENT
	Minor Non-Conformance	<ul style="list-style-type: none"> 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. <p>For the BC Works:</p> <p>The implementation of the Kitimat Modernization Project (KMP) helped build a state-of-the-art smelter that reduced GHG emissions by more than 36%. That 36% intensity targets and the corresponding absolute target of 898,800 t CO₂ eq. were published in 2013 as Post-KMP targets that were met and even surpassed in 2017 (after a completed ramp-up).</p>
5.3a Aluminium Smelting (management system)	Conformance	<ul style="list-style-type: none"> In 2018, there is no evidence available to demonstrate that the Kitimat Smelter published its time-bound post ramp-up GHG emissions reduction targets for the upcoming years. <p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these GHG Management System requirements.</p> <p>The Entity's BC site internal management system works to limit direct GHG emissions. The applicable provincial and federal GHG regulations are built from the International Aluminium Institute (IAI) methodology for aluminium GHG calculations.</p> <p>The Entity's direct GHG emissions are annually verified by accredited verification bodies (third parties).</p> <p>GHG Emissions are approximately 3 to 4 times lower than 8 tonnes of CO₂ eq.</p>
5.3b Aluminium Smelting (up to and including 2020)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these GHG emission requirements.</p> <p>The Entity's direct GHG emissions are annually verified by accredited verification bodies (third parties).</p> <p>The Entity's BC Works uses the IAI and the GHG Protocol methodology in their GHG calculations.</p> <p>BC Works (new smelter) emits around 2 t CO₂ eq. per metric ton of Aluminium.</p>
5.3c Aluminium Smelting (after 2020)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these GHG emission requirements.</p> <p>The Entity's direct GHG emissions are annually verified by accredited verification bodies (third parties).</p>

CRITERION	RATING	COMMENT
		<p>The GHG Emissions will be approximately 3 to 4 times lower than 8 tonnes of CO₂ eq.</p> <p>The Entity's BC site is below the 8 tonnes of CO₂ eq. BC Works (new smelter) emits around 2 t CO₂ eq. per metric ton of Aluminium.</p>
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>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.</p> <p>BC Works' air emissions summary is included in the Annual Sustainability Report</p> <p>Extensive studies and monitoring plans implemented to minimise, quantify and report emissions to air</p> <p>A specific environment effect monitoring (EEM) Plan has been implemented to monitor material air emissions. The results are regularly reported to environmental authorities and in BC Works's Annual Environmental Report available on RT's website (https://www.riotinto.com/canada/bc-works-4818.aspx)</p> <p>Most air emissions have decreased with the implementation and ramp-up of the new Kitimat Smelter except for sulfur dioxide (SO₂). A specific and exhaustive SO₂ environmental monitoring plan is implemented and the monitoring results are reported, amongst others, on RT's website (https://www.riotinto.com/canada/bc-works-4818.aspx).</p>
6.2 Discharges to Water	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the discharges to water requirements.</p> <p>The Entity is ISO 14001 certified and carries out EHS legal / regulatory compliance for this criterion.</p> <p>By the Permit, BC Works produce and transmit to the Authorities monthly reporting on discharged water parameters measurements on a monthly basis. The 2017 Environment Report for BC Works is published. Water and groundwater monitoring results are summarised in this annual report (https://www.riotinto.com/canada/bc-works-4818.aspx).</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these requirements. For BC Works, over 1100 scenarios of spills have been assessed and evaluated throughout RTA. This was done</p>

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		<p>with a 5x5 risk matrix.</p> <p>The Entity has an exhaustive spill and leakage action plan in place.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these requirements.</p> <p>The Entity has an exhaustive spill and leakage action plan in place.</p> <p>Communication plan and procedures (BC Works Spill Response Guideline) are in place to manage spill reporting, from site level to the regional level. For significant spills, the information is raised up to Rio Tinto HSE Group. P2 permit Environmental monitoring is displayed. The published 2017 BC Works Environmental report summarized spills and non-compliances (https://www.riotinto.com/canada/bc-works-4818.aspx).</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these spills reporting requirements. The Entity reports spills.</p> <p>The published 2017 BC Works Environmental report summarized spills and non-compliances (https://www.riotinto.com/canada/bc-works-4818.aspx).</p>
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	<p>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.</p> <p>Note that the above Minor Non-Conformance does not apply to the BC Works. For the BC Works:</p> <ul style="list-style-type: none"> • By the P2 Permit, declaring any spill to the authorities is mandatory. • RTA publicly discloses number of spills, notice of violations, prosecutions and number of penalties in its Annual Environmental Report for BC Works. • Annual Environmental Report for BC Works states the spills occurred during the previous year. The report is available on RTA Website (https://www.riotinto.com/canada/bc-works-4818.aspx).
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that</p>

CRITERION	RATING	COMMENT
		<p>conform to these waste management and reporting requirements.</p> <p>The Entity has a waste management action plan.</p> <p>Waste management is reported (summarized) in the Annual BC Works Environmental Report (2015, 2016, and 2017 - https://www.riotinto.com/canada/bc-works-4818.aspx).</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these waste management and reporting requirements.</p> <p>The Entity reports on waste management in its annual sustainability report.</p> <p>Waste management is reported (summarized) in the Annual BC Works Environmental Report (2015, 2016, and 2017 - https://www.riotinto.com/canada/bc-works-4818.aspx).</p>
6.6a Bauxite Residue (storage construction)	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 storage sites are operated in accordance with legal and regulatory guidelines.</p>
6.6b Bauxite Residue (integrity checks and controls)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these bauxite residue requirements.</p> <p>Regular third party inspections are carried out at bauxite residue storage sites.</p>
6.6c Bauxite Residue (water discharge)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these bauxite residue 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>

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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 Plant located in Saguenay (Quebec) that optimises carbon recovery.</p> <p>Since 2017, 100% of SPL produced at BC Works is sent to the SPL treatment plant by rail in sealed bin for SPL collected after a pot clean.</p> <p>Absolutely no SPL is sent to landfill.</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.</p> <p>The Entity has a SPL Treatment Plant located in Saguenay (Quebec) that optimises 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 Plant located in Saguenay (Quebec) that optimises carbon recovery.</p> <p>Since 2017, 100% of SPL produced at BC Works is sent to the SPL treatment plant by rail in sealed bin for SPL collected after a pot clean.</p> <p>Absolutely no SPL is sent to landfill.</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 process.</p> <p>The Entity has a SPL Treatment Plant located in Saguenay (Quebec) that optimises carbon recovery.</p> <p>Since 2017, 100% of SPL produced at BC Works</p>

CRITERION	RATING	COMMENT
		<p>is sent to the SPL treatment plant by rail in sealed bin for SPL collected after a pot clean.</p> <p>Absolutely no SPL is sent to landfill.</p>
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	<p>The Entity's untreated SPL are stored in closed warehouses using closed and controlled water drainage systems.</p> <p>No SPL is discharged to marine or aquatic environments.</p>
6.8a Dross (recovery)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these dross requirements.</p> <p>Dross generated by the Entity is processed to maximise aluminum recovery.</p> <p>All dross generated by the production centers is processed by a specialised external companies (Noval, Ontario and Real Alloy Recycling, Idaho).</p> <p>All metal (aluminum and alloys) is internally recovered.</p>
6.8b Dross (recycling)	Conformance	<p>The Entity works to help maximise the recycling of treated dross residues.</p> <p>All dross generated by the electrolysis process of all production units are treated.</p> <p>The majority of the non-metallic solid part of the treated residues (called Noval) is valued in areas such as cement and steel. A periodic monitoring of shipments is required by RTA to its subcontractor.</p> <p>A proportion representing less than 50% of the treated residues is shipped and buried in a standardized landfill for receiving this type of residue. An accounting of the volumes shipped is made and RTA keeps track of them on a periodic basis.</p>
6.8c Dross (review of alternatives)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these dross requirements.</p> <p>The process is reviewed annually and research projects are underway to continually improve the performance of the process and reduce dross residues.</p>
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these water assessment requirements.</p>

CRITERION	RATING	COMMENT
		<p>The Entity tracks water consumption annually.</p> <p>The Nechako Reservoir for the Kemano Power Operation is also closely monitored, mapped, and managed. The Nechako Reservoir Management Plan summary is published.</p> <p>The Hydrology Team of the Quebec power operation also supports the Kemano Power Operation and the Nechako Reservoir Management.</p> <p>The Kemano and watershed water balance is documented and monitored.</p>
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these water assessment requirements.</p> <p>The Entity has performed extensive studies and impact assessments related to water-related risks. Proper mitigation measures were implemented.</p> <p>BC Works has assessed water-related risks in the Watershed.</p> <p>There is a Nechako Reservoir Dam Emergency Plan in case of dam overflow/failure.</p> <p>The Hydrology Team of the Quebec power operation also supports the Kemano Power Operation and the Nechako Reservoir Management.</p> <p>The Kemano and watershed water balance is documented and monitored. Local operators help mitigate flood risks in time of water surplus to ensure public safety.</p> <p>The area of influence of the Nechako Reservoir and the watershed are mapped in detail.</p>
7.2a Water management (management plans)	Conformance	<p>Rio Tinto sites in Canada have developed and implemented policies, systems, procedures and processes that conform to these water management requirements.</p> <p>Each site included in the Entity's scope has a water management plan in place which is updated every year.</p> <p>Further, the Nechako Reservoir and Watershed Management Plan is, at least, annually revised. It is continuously monitored and monthly reports on material risk are produced for BC Works managers.</p> <p>Material element and monitoring results of the Watershed Management Plan are available on RTA's Website (https://www.riotinto.com/default.aspx).</p>

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Conformance	<p>Rio Tinto sites in Canada have developed and implemented policies, systems, procedures and processes that conform to the monitoring of effectiveness of plans requirements.</p> <p>The Entity monitors periodically the effectiveness of water management plans for all their sites in Canada.</p> <p>The Dam Emergency Plan effectiveness is monitored throughout water surplus period and through drills.</p> <p>The Nechako Reservoir and watershed monitoring plan is continuously monitored through DCS systems and diagnostic/expertise from the Quebec hydrology team help optimise effectiveness.</p> <p>Material element and monitoring results of the Watershed Management Plan are available on RTA's Website (https://www.riotinto.com/default.aspx).</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity discloses water usages and risks in its sustainable development report for all their sites in Canada: (https://www.riotinto.com/canada/bcworks/reports-17826.aspx)</p> <p>Material element and monitoring results of the Watershed Management Plan are available on RTA's Website: (https://www.riotinto.com/default.aspx).</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>Rio Tinto sites in Canada have developed and implemented policies, systems, procedures and processes that conform to the biodiversity assessment requirements.</p> <p>The Entity has performed biodiversity risk assessments for all their sites in Canada.</p> <p>Exhaustive biodiversity risk assessments have been realised by BC Works for the Kemano Power operations in 2011 and for the Kitimat facilities in 2015 with the help of a specialised consultant firm. These 2 risks assessments and the corresponding Biodiversity Action Plan (BAP) are currently in review to make sure they are still relevant and up-to-date. The 2 BAPs are covering BC Works area of influence.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>Rio Tinto sites in Canada have 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.</p>

CRITERION	RATING	COMMENT
		<p>BC Works considers both risks and opportunities for biodiversity in their management plan. The Kitimat and Kemano BAPs address material impacts, have time-bound targets, and are monitored for effectiveness. More specifically, the reservoir and the Kemano Operations affect the Nechako River which is a regulated salmon river. The Nechako Fisheries Conservation Program (NFCP) is jointly monitored by Rio Tinto, Fisheries and Ocean Canada and, BC ministry of Environment.</p>
<p>8.2b Biodiversity management (consultation and mitigation hierarchy)</p>	<p>Conformance</p>	<p>Stakeholders were involved in the biodiversity action plan for the Entity in Canada.</p> <p>Both Kitimat and Kemano BAPs are designed in accordance with the Biodiversity Mitigation Hierarchy</p> <p>For the Kitimat Smelter BAP, most of the consultation with local communities/stakeholders are realised with the Kitimat Public Advisory Committee (KPAC)</p> <p>For the Kemano Power Operation and the Management of the Nechako Reservoir a lot of meetings were realised with multiple Groups of stakeholders. More recently (2017), Rio Tinto implemented a focussed Water Engagement Initiative (WEI) to group together most of the Nechako Watershed communities to exchange interests, needs and advice between stakeholders and facilitate dialogue. The WEI may help identify measures that BC Works can implement voluntarily to enhance operations (including to enhance BAP).</p>
<p>8.2c Biodiversity management (reporting)</p>	<p>Conformance</p>	<p>The Entity's Biodiversity management outcomes are shared with stakeholders and the public.</p> <p>The achieved BAPs outcomes are showed through the Annual Sustainability Reports and progress are also posted on the Rio Tinto Website (https://www.riotinto.com/canada/bc-works-4818.aspx).</p> <p>Annual report of the Nechako Fisheries Conservation Program (NFCP) are available on request on the NFCP Website. It includes monitoring of stock and habitat performance and remedial measures.</p>
<p>8.3 Alien Species</p>	<p>Conformance</p>	<p>The Entity preventive action plans comply with the strict national regulations. The prevention of alien species is strictly regulated under Transport Canada regulations, on which RTA complies. 96 hours before entering the Canadian territorial waters, the ballast waters have to be purged 3 times and recorded. Once the application completed and verified, Transport Canada issued</p>

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		<p>an authorization to the ship.</p> <p>In 2017, 125 ships were authorized and a sampling on 7 ships confirm the Transport Canada approval. In addition, during the summer months, each ship coming from Asia-pacific requires a certificate for the Asian Gypsy Moth (AGM), delivered by Transport Canada. On a sampling of 5 ships, all ships had their AGM certificates. Other examples of sample ships also help demonstrate that had their AGM certificates. Also, the Kemano T2 Project Environmental Management Plan also had provision for the flora and the fauna, including weeds and invasive species mitigation.</p>
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	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Human Rights Due Diligence requirements.</p> <p>Policies that include commitments to respect Human Rights are available, integrated into activities and implemented. The due diligence process is implemented.</p> <p>Regular meetings and training on Ethics and Integrity are conducted for all staff to ensure awareness and compliance with the policies.</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to these Human Rights Due Diligence requirements.</p> <p>A Human Rights due diligence process is set out in the Policies and is based on risk management. The due diligence process is implemented.</p>
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

CRITERION	RATING	COMMENT
		<p>requirements.</p> <p>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</p>
9.2 Women's Rights	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the women's rights requirements.</p> <p>Women's rights are highly valued and respected in Canada and this culture is also broadly implemented in the Entity.</p>
9.3 Indigenous Peoples	Conformance	<p>Rio Tinto sites in Canada have developed and implemented policies, systems, procedures and processes that conform to the Indigenous people's requirements.</p> <p>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 throughout every site in the Entity in Canada.</p> <p>Rio Tinto Canada has established a national Indigenous Relations Strategy and completing a First Nations strategy for BC.</p> <p>The BC Works footprint is mapped and spans over 500 km and crossed known (mapped) traditional territories of different First Nations. The First Nations engagement is based on openness, respectful and mutually beneficent interests. The Watershed First Nations includes many First Nations including those who are not directly adjacent to it who were impacted by its development. The rights and interests of the First Nations are known and considered and consultations are ongoing. Rio Tinto works at building beneficial relationships with First Nations and have established a 30 year Haisla - Rio Tinto Legacy Agreement with the Haisla Nation and have been working on a New Day Agreement with the Cheslatta Nation.</p> <p>In addition, Rio Tinto works on specific projects with First Nations that establish capacity and long term employment opportunities. The Kitamaat Valley Institute is a 50% partnership between Rio Tinto and the Haisla Nation and Rio Tinto supported the establishment of the Cheslatta training centre that supports Cheslatta and other First Nations in the watershed.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>Rio Tinto sites in Canada have developed and implemented policies, systems, procedures and</p>

CRITERION	RATING	COMMENT
		<p>processes that conform to the Free Prior and Informed Consent requirements.</p> <p>In BC, communications between First Nations and Rio Tinto is ongoing. The process is in constant evolution and improvement. The upcoming “Kemano T2 Project” (the completion of the Power Operation’s 2nd tunnel) has been the object of vast permitting process through various provincial agencies that included, amongst others, an extensive consultation with concerned First Nations of the Watershed. The Cheslatta Carrier Nation and the Haisla Nation are participating in the Kemano T2 project with Rio Tinto, ensuring that their cultures and traditions are respected as the construction of the project and associated facilities are undertaken in 2018.</p> <p>The BC Works footprint is mapped and spans over 400 km and crosses known (mapped) traditional territories of different First Nations. The First Nations engagement is based on openness, respectful and mutually beneficial interests. The Watershed includes many First Nations including those who are not directly adjacent to it and who were impacted by its development. The rights and interests of the First Nations are known and considered and consultations are ongoing.</p> <p>More generally, the recent BC Works major projects, e.g. the Kitimat Modernization Plan (KMP: 2012–2015) and the Kemano T2 Project (2018–2020), did not significantly modify RTA footprint in BC and received the proper federal/provincial authorizations/permits. These authorization/permitting processes involved due diligence demonstrations from the promoter regarding the FPIC amongst other with the concerned First Nations whose occupied territories are located within or close to the footprint of the projects. The obtained permits/authorizations from the governments help demonstrate that RTA strive to reach FPIC from the concerned First Nations bands.</p> <p>Other findings made for the applicable parts of ASI criteria 9.3 to 9.7 from this report also help demonstrate the implementation of RTA’s consultation/participation processes with the concerned First Nations.</p>
9.5 Cultural and sacred heritage	Conformance	<p>Rio Tinto sites in Canada have developed and implemented policies, systems, procedures and processes that conform to the cultural and sacred heritage requirements.</p> <p>In Quebec, a Partnership and Mutual Respect Agreement with the First Nation community is implemented.</p> <p>In BC, communications between First Nations and Rio Tinto is on-going. The process is in</p>

CRITERION	RATING	COMMENT
		<p>constant evolution and improvement.</p> <p>In BC, the upcoming "Kemano T2 Project" (the completion of the Power Operation 2nd tunnel) has been the object of vast permitting process through various provincial agencies that included, amongst others, extensive consultation with concerned First Nations of the Watershed. The Cheslatta Carrier Nation and Haisla Nation are participating in the Kemano T2 project with Rio Tinto, including ensuring their cultures and traditions are respected as the construction of the project and associated facilities are undertaken in 2018.</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> <p>The Kemano T2 Project will not significantly modify RTA footprint in BC. Consultation with concerned stakeholders were made through the permitting process. All feasible means / alternatives have been considered to avoid and minimise physical/economical displacement while balancing environmental, social and financial costs and benefits. According to the project summary presentation document, the Haisla Nation and Cheslatta Carrier Nation is participating with Rio Tinto on the project, including ensuring their cultures and traditions are respected as Rio Tinto undertakes construction of the project. Rio Tinto and Cheslatta Carrier Nation are also working toward a long term relationship agreement called the New Day Agreement.</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> <p>The Kemano T2 Project will not significantly modify RTA footprint in BC. Consultation with concerned stakeholders were made through the permitting process. All feasible means / alternatives have been considered to avoid and minimise physical/economical displacement while balancing environmental, social and financial costs and benefits. According to the project summary presentation document, the Haisla Nation and Cheslatta Carrier Nation are participating with Rio Tinto on the project,</p>

CRITERION	RATING	COMMENT
		<p>including ensuring their cultures and traditions are respected as Rio Tinto undertakes construction of the project.</p> <p>More generally, the recent BC Works major projects, the Kitimat Modernisation Plan (KMP: 2012-2015) and The Kemano T2 Project (2018-2020) did not involve physical displacements as they did not significantly modify RTA footprint in BC. A Resettlement Action Plan according to the applicable requirements of IFC Performance Standard 5 have not been necessarily required yet.</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>In Quebec, the Entity is maintaining Good Neighborhood Committees to exchange information, opinions and develop opportunities to respect and support livelihoods with a constructive approach.</p> <p>In the Province of British Columbia, The Kitimat Public Advisory Committee (KPAC) consists of 18 + members from community organizations. The KPAC meets quarterly (1 day meeting) to communicate permits, operational information, business updates and shares complaints, grievances and requests for information.</p> <p>In the watershed area Rio Tinto has established a Water Engagement Initiative (WEI) that provides an opportunity community members, stakeholders and organizations of the Nechako Watershed/Reservoir (Kemano Power Operations) to share interests, concerns and priorities with Rio Tinto. It is also an avenue to monitor complaints, grievances and requests for information.</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>In Quebec, the Entity is maintaining Good Neighborhood Committees to exchange information, opinions and develop opportunities to respect and support livelihoods with a constructive approach.</p> <p>In the Province of British Columbia, The Kitimat Public Advisory Committee (KPAC) consists of 18 + members from community organizations. The KPAC meets quarterly (1 day meeting) to communicate permits, operational information, business updates and shares complaints, grievances and requests for information.</p>

CRITERION	RATING	COMMENT
		<p>In the watershed area Rio Tinto has established a Water Engagement Initiative (WEI) that provides an opportunity community members, stakeholders and organizations of the Nechako Watershed/Reservoir (Kemano Power Operations) to share interests, concerns and priorities with Rio Tinto. It is also an avenue to monitor complaints, grievances and requests for information.</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>In Quebec, the Entity is maintaining Good Neighborhood Committees to exchange information, opinions and develop opportunities to respect and support livelihoods with a constructive approach.</p> <p>In the Province of British Columbia, The Kitimat Public Advisory Committee (KPAC) consists of 18 + members from community organizations. The KPAC meets quarterly (1 day meeting) to communicate permits, operational information, business updates and shares complaints, grievances and requests for information.</p> <p>In the watershed area Rio Tinto has established a Water Engagement Initiative (WEI) that provides an opportunity community members, stakeholders and organizations of the Nechako Watershed/Reservoir (Kemano Power Operations) to share interests, concerns and priorities with Rio Tinto. It is also an avenue to monitor complaints, grievances and requests for information.</p>
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. Canada presents 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 implemented security practices and processes respect Human Rights.</p>

CRITERION	RATING	COMMENT
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> <p>The recent negotiated 2017-2018 Collective Labour Agreement (CLA) is the object of different comprehension and interpretation between Rio Tinto and the union (Unifor local 2301).</p> <p>As the involved parties are not always able to agree on some of the CLA items, they go in arbitration to have the support of a third independent party to help solve disagreements and misunderstandings. The CLA different comprehension and interpretation and the related arbitrage process do not necessarily represent direct non-conformance to the corresponding ASI-PS Criteria but BNQ will implement follow-up actions to help make sure that ASI-PS Criteria will continue to be met. In their way, BC Work adhere to the CLA.</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 that conform to these Child Labour requirements.</p> <p>Policies and laws are in place to avoid individuals under 18 years being hired by the company.</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>

CRITERION	RATING	COMMENT
		<p>The Entity has an Ethics and Integrity group that provides the framework for compliance to this criterion.</p>
<p>10.3a Forced Labour (human trafficking)</p>	<p>Conformance</p>	<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>
<p>10.3b Forced Labour (deposits, fees, advances)</p>	<p>Conformance</p>	<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>
<p>10.3c Forced Labour (migrant workers)</p>	<p>Conformance</p>	<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>
<p>10.3d Forced Labour (debt bondage)</p>	<p>Conformance</p>	<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>
<p>10.3e Forced Labour (freedom of movement)</p>	<p>Conformance</p>	<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>
<p>10.3f Forced Labour (retention of identity papers, permits, certificates)</p>	<p>Conformance</p>	<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 the company keeping original copies of workers' IDs, work permits, travel documents or training certificates.</p>

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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.</p> <p>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> <p>A new Collective Labor Agreement between BC Works and the local Union (local 2301) was signed in July 2017. It included a letter of understanding on harassment and non-discrimination. Also, according to the Haisla (First) Nation Councillor, the BC Works Managers shall continue helping the First Nation surrounding communities better understanding and implementing the employability, capacity and training requirements to raise the number of engaged Rio Tinto's first nation's member staff and to replace the ones that are retired or about to retire.</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> <p>In BC Works, the recent negotiated 2017-2018 Collective Labour Agreement (CLA) is the object of different comprehension and interpretation between Rio Tinto and the union (Unifor local 2301).</p> <p>As the involved parties are not always able to agree on some of the CLA items, they go in arbitration to have the support of a third independent party to help them solve disagreements and misunderstandings. The CLA different comprehension and interpretation from the parties and the related arbitrage process do not necessarily represent direct non-conformance to the corresponding ASI-PS Criteria but BNQ will implement follow-up actions to help make sure that ASI-PS Criteria will continue to be met.</p>

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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 policies, systems, procedures and processes that conform to the working time requirements.</p> <p>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&S) Policy requirements.</p> <p>The Entity has a written and implemented an Occupational Health and Safety Policy.</p> <p>Rio Tinto has released in February 2018 a new Health, Safety, Environment and Communities Policy which applies to all Rio Tinto locations. The Policy is available on SharePoint on Element 01 and is posted about 10 different locations on the Rio Tinto site. The Policy was sent electronically to all staff and was presented to all employees. The Policy is included in the HSE (Health Safety Environment) induction for all new employees and contractors.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The principles of the HSEC (Health, Safety, Environment and Communities) Policy are explained in a document "The Way We Work", which a mandatory reading is required annually to all Rio Tinto staff.</p> <p>The Policy is posted in about 10 different areas of</p>

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		<p>the sites and on the Rio Tinto intranet.</p> <p>The Policy is also presented to the visitors and the contractors.</p>
<p>11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)</p>	<p>Minor Non-Conformance</p>	<p>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> <p>For the BC Works:</p> <ul style="list-style-type: none"> The Occupational Health and Safety (OH&S) Policy Commitment to comply with applicable OH&S Laws and Regulation has not been regularly or recently reviewed at BC Works. The verified evidence demonstrates that the last OH&S Laws and Regulation Compliance Audit was officially deployed in 2013 at BC Works.
<p>11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)</p>	<p>Conformance</p>	<p>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. The Rio Tinto document "The Way we work" is a set of principles which explains and supports the application of the HSEC Policy. The document clearly states the right of workers to understand the hazards and execute safe practices for their work. It also includes the duty and right for workers to refuse or stop any unsafe work.</p>
<p>11.2 OH&S Management System</p>	<p>Conformance</p>	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the OH&S management system requirements.</p> <p>The Health, Safety, Environment and Community (HSEC) Management System includes 17 elements, aligned with OHSAS 18001 international OH&S Management System (OHSMS) Standard requirements.</p> <p>The Entity's OH&S Management System is well implemented, monitored and maintained.</p>
<p>11.3 Employee engagement on health and safety</p>	<p>Conformance</p>	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the employee engagement on health and safety requirements.</p> <p>Joint Health & Safety committees are in place at each site to improve the OH&S performance and address issues, including worker's concerns and suggestions.</p> <ul style="list-style-type: none"> 5 Joint Health & Safety committees are in place: Central Joint H&S Committee, the Vehicle/Pedestrian committee, the PPE

CRITERION	RATING	COMMENT
		<p>committee, the Health and Hygiene committee and the OHS&E Program.</p> <ul style="list-style-type: none"> • Each committee meets between 6-10 times a year, with a formal agenda • Agenda from the Central Joint H& S Committee includes the review of accident and incidents, review of a tour/inspections, the H&S objectives (e.g.: mental health objectives), update of other committees and update of the Critical Risk Management (CRM) • Minutes are sent to the union reps to be posted in the plant and are also available on the web. Actions are recorded in the minutes and are tracked at the next meeting. A summary of items closed during the year is kept at the end of the minutes.
11.4 OH&S performance	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the OH&S performance requirements.</p> <p>The Entity's OH&S performance indicators are continuously tracked continuously and reported on a monthly basis to the site Manager and Rio Tinto HSEC Function Managers 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
2	18 January 2019	Updated to reflect Certification Scope change