
ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

UC RUSAL

CERTIFICATE
NUMBER

35

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

20 JUNE 2019

DATE OF EXPIRY

19 JUNE 2022

CERTIFIED SINCE

20 JUNE 2019

AUTHORISED BY

A handwritten signature in white ink, appearing to be 'J. H.', written over a dark grey background.

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard*

CERTIFICATION SCOPE

Headquarters (Moscow, Russia) manages the following facilities: JSC «Boksit Timana» (bauxite mining); RUSAL Kamensk-Uralskiy (alumina refining); Branch of PJSC RUSAL Bratsk in Shelekhov (aluminium smelting, casthouse and semi-fabrication)

SUMMARY AUDIT REPORT CHAIN OF CUSTODY STANDARD

OVERVIEW

| | |
|-------------------------|---|
| MEMBER NAME | UC Rusal |
| ENTITY NAME | UC Rusal |
| CERTIFICATION SCOPE | Headquarters (Moscow, Russia) manages the following facilities: JSC «Boksit Timana» (bauxite mining); RUSAL Kamensk-Uralskiy (alumina refining); Branch of PJSC RUSAL Bratsk in Shelekhov (aluminium smelting, casthouse and semi-fabrication). |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Casthouse• Post-casthouse |
| ASI STANDARD | <ul style="list-style-type: none">• Chain of Custody Standard V1 |
| AUDIT TYPE | <ul style="list-style-type: none">• Certification Audit |
| AUDIT FIRM | DNV GL |
| AUDIT DATE | 20 February – 28 March 2019 |
| AUDIT REPORT SUBMISSION | 21 May 2019 |
| AUDIT SCOPE | <p>UC Rusal Headquarters (Moscow, Russia) and the following facilities: JSC Boksit Timana (bauxite mining, Russia); RUSAL Kamensk-Uralskiy (alumina refining, Russia); Branch of PJSC RUSAL Bratsk in Shelekhov (aluminium smelting, casthouse, post-casthouse, Russia).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Casthouse |

-
- Post-casthouse

All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

- Certification
-

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
 - The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION
PERIOD

20 June 2019 – 19 June 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

19 June 2021

CERTIFICATION
NUMBER

35

SUMMARY OF FINDINGS

| CRITERION | RATING | COMMENT |
|---|----------------|---|
| 1 MANAGEMENT SYSTEM AND RESPONSIBILITIES | | |
| 1.1 ASI membership | Conformance | RUSAL is an ASI Member with good standing in the Production and Transformation class. |
| 1.2 Management system | Conformance | The established procedures and processes are compatible with ASI CoC criteria regarding the periodic review of the management system and associated updates as required. |
| 1.3 Management system reviews | Conformance | The established procedures and processes are compatible with ASI CoC criteria regarding the periodic review of the management system and associated updates as required. |
| 1.4 Management representative | Conformance | The appointed management representatives are responsible for ASI CoC Standard implementation and have sufficient authority to ensure Entity's conformance with all applicable requirements. |
| 1.5 Training | Conformance | The developed and maintained communication and training measures keep all personnel updated about their roles and responsibilities, and provide adequate training for them. |
| 1.6 Record keeping | Conformance | The Entity's system defines the retention time as required by the ASI CoC Standard. Together with requirements of the Guide, they provide adequate record management practices. |
| 1.7a Reporting to ASI (Inputs and Outputs) | Conformance | All necessary conditions are provided to satisfy this requirement. |
| 1.7b Reporting to ASI (Input Percentage) | Conformance | All necessary conditions are provided to satisfy this requirement. |
| 1.7c Reporting to ASI (Positive Balance) | Conformance | All necessary conditions are provided to satisfy this requirement. |
| 1.7d Reporting to ASI (Internal Overdraw) | Conformance | All necessary conditions are provided to satisfy this requirement. |
| 1.7e Reporting to ASI (Eligible Scrap) | Not Applicable | The Entity has not included Aluminium Re-melting/Refining in its certification scope. |
| 1.7f Reporting to ASI (ASI Credits from Casthouses) | Conformance | All necessary conditions are provided to satisfy this requirement. However, no credits have been issued to date. |
| 1.7g Reporting to ASI (ASI Credits purchased) | Not Applicable | The Entity does not intend to use purchase ASI Market Credits. |

| CRITERION | RATING | COMMENT |
|--|----------------|--|
| 2 OUTSOURCING CONTRACTORS | | |
| 2.1 Outsourcing Contractors in CoC Certification Scope | Not Applicable | In the certification scope of the Entity, Outsourcing companies are not stipulated. |
| 2.2a Control of CoC Material | Not Applicable | In the certification scope of the Entity, Outsourcing companies are not stipulated. |
| 2.2b No further outsourcing | Not Applicable | In the certification scope of the Entity, Outsourcing companies are not stipulated. |
| 2.2c Risk assessment | Not Applicable | In the certification scope of the Entity, Outsourcing companies are not stipulated. |
| 2.3 Output Quantity | Not Applicable | In the certification scope of the Entity, Outsourcing companies are not stipulated. |
| 2.4 Verification and record-keeping | Not Applicable | In the certification scope of the Entity, Outsourcing companies are not stipulated. |
| 2.5 Error management | Not Applicable | In the certification scope of the Entity, Outsourcing companies are not stipulated. |
| 3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL | | |
| 3.1a CoC Certification Scope – Bauxite Mining | Conformance | The observed system ensures production of ASI Bauxite only from the bauxite mine that is within the Entity's CoC Certification scope. |
| 3.1b ASI Performance Standard – Bauxite Mining | Conformance | The observed system ensures production of ASI Bauxite only from the bauxite mine that is certified against the ASI Performance Standard. |
| 3.2a CoC Certification Scope – Alumina Refining | Conformance | The observed system ensures production of ASI Alumina only from the alumina refinery that is within the Entity's CoC Certification Scope. |
| 3.2b ASI Performance Standard – Alumina Refining | Conformance | The observed system ensures production of ASI Alumina only from the alumina refinery that is certified against the ASI Performance Standard. |
| 3.3a CoC Certification Scope – Aluminium Smelting | Conformance | The observed system ensures production of ASI Liquid Metal only from the aluminium smelter that is within the Entity's CoC Certification Scope. |
| 3.3b ASI Performance Standard – Aluminium Smelting | Conformance | The observed system ensures production of ASI Liquid Metal only from the aluminium smelter that is certified against the ASI Performance Standard. |
| 4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL | | |
| 4.1a CoC Certification Scope – Aluminium Re-Melting/Refining | Not Applicable | This criterion is not applicable to the Entity's certification scope. |

| CRITERION | RATING | COMMENT |
|---|----------------|---|
| 4.1b ASI Performance Standard – Aluminium Re-Melting/Refining | Not Applicable | This criterion is not applicable to the Entity's certification scope. |
| 4.2a Pre-Consumer Scrap and Dross | Not Applicable | This criterion is not applicable to the Entity's certification scope. |
| 4.2b Post-Consumer Scrap | Not Applicable | This criterion is not applicable to the Entity's certification scope. |
| 4.3a Supplier records | Not Applicable | This criterion is not applicable to the Entity's certification scope. |
| 4.3b Cash payments | Not Applicable | This criterion is not applicable to the Entity's certification scope. |

5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

| | | |
|--|-------------|--|
| 5.1a CoC Certification Scope – Casthouses | Conformance | The observed system ensures production of ASI Aluminium only from the Casthouse that is within the Entity's CoC Certification Scope. |
| 5.1b ASI Performance Standard – Casthouses | Conformance | The observed system ensures production of ASI Aluminium only from the Casthouse Certified against the ASI Performance Standard. |
| 5.2 Casthouse Products | Conformance | The Material Accounting System on the Casthouse site of the Entity is ready and has been tested. |

6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

| | | |
|--|----------------|---|
| 6.1a CoC Certification Scope – Post-Casthouse | Conformance | The observed system ensures production of ASI Aluminium only from the Post-Casthouse that is within the Entity's CoC Certification Scope. |
| 6.1b ASI Performance Standard – Post-Casthouse | Conformance | The observed system ensures production of ASI Aluminium only from the Post-Casthouse Certified against the ASI Performance Standard. |
| 6.1c Sourcing ASI Aluminium | Not Applicable | The Entity does not plan to source ASI Aluminium from other Entities for its post-casthouse within the Certification Scope. |

7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL

| | | |
|---|-------------|---|
| 7.1a Responsible sourcing policy (anti-corruption) | Conformance | The Entity adopted and communicated a responsible sourcing policy (RUSAL Business Partner Code), which takes into account the criterion 1.2 (Anti-corruption) in the ASI Performance Standard to the main suppliers of bauxite and alumina. |
| 7.1b Responsible sourcing policy (responsible sourcing) | Conformance | The Entity adopted and communicated a responsible sourcing policy (RUSAL Business Partner Code), which takes into account the criterion 2.4 |

| CRITERION | RATING | COMMENT |
|--|----------------|---|
| | | (Responsible Sourcing) in the ASI Performance Standard to the main suppliers of bauxite and alumina. |
| 7.1c Responsible sourcing policy (human rights due diligence) | Conformance | The Entity adopted and communicated a responsible sourcing policy (RUSAL Business Partner Code), which takes into account the criterion 9.1 (Human Rights Due Diligence) in the ASI Performance Standard to the main suppliers of bauxite and alumina. |
| 7.1d Responsible sourcing policy (conflict affected and high risk areas) | Conformance | The Entity adopted and communicated a responsible sourcing policy (RUSAL Business Partner Code), which takes into account the criterion 9.8 (Conflict-Affected and High-Risk Areas) in the ASI Performance Standard to the main suppliers of bauxite and alumina. |
| 7.2 Risk assessment | Conformance | The Entity assesses the risks of non-compliance with its responsible sourcing policy by its suppliers of Non-CoC Material, documents the findings, and undertakes measurable risk mitigation where risks of adverse impacts are identified. |
| 7.3 Complaints mechanism | Conformance | The Entity has established a complaints mechanism that is appropriate to the nature, scale and impact of the business and that allows interested parties to voice concerns about non-compliance with its responsible sourcing policy in its aluminium supply chain. |
| 8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM | | |
| 8.1 Material Accounting System | Conformance | The Entity's management system includes a Material Accounting System that records input quantity and output quantity of CoC Material and Non-CoC Material, by mass. |
| 8.2a Post-Consumer Scrap | Not Applicable | This criterion is not applicable to the Entity's certification scope. |
| 8.2b Pre-Consumer Scrap (total) | Not Applicable | This criterion is not applicable to the Entity's certification scope. |
| 8.2c Pre-Consumer Scrap (Eligible Scrap) | Not Applicable | This criterion is not applicable to the Entity's certification scope. |
| 8.3 Material Accounting Period | Conformance | The Material Accounting Period in the Entity's Material Accounting System is 12 months starting from the first day of the calendar year. |

| CRITERION | RATING | COMMENT |
|--|----------------|---|
| 8.4 Input Percentage | Conformance | The Input Percentage is used for this Material Accounting Period to determine the output quantity of the CoC Material by weight with use the formula determined by the CoC Standard. |
| 8.5 Input Percentage (Aluminium Re-Melting and Refining) | Not Applicable | This criterion is not applicable to the Entity's certification scope. |
| 8.6 Output Quantity determination | Conformance | The Entity's documentation ensures the use of the input percentage for the given Material Accounting Period to determine the output quantity of CoC Material, by mass. |
| 8.7 Output Quantity designation | Conformance | The Output Quantity of CoC Material, which may form part of the total production, is designated as 100% of the CoC Material. |
| 8.8 Output Quantity – Pre-Consumer Scrap | Not Applicable | The Entity does not produce Pre-Consumer Scrap from its processing in order to designate the relevant proportion as Eligible Scrap. |
| 8.9 Outputs not exceed inputs | Conformance | The Entity's Material Accounting System ensures that the production of CoC Materials will not proportionally exceed the Input percentage of the total CoC Material for the Material Accounting Period. |
| 8.10a Internal Overdraws (not exceed 20%) | Conformance | The Entity's system does not allow transferring of an Internal Overdraw to the next Material Accounting Period (calendar year). |
| 8.10b Internal Overdraws (not exceed affected amount) | Conformance | The Entity's system does not allow transferring of an Internal Overdraw to the next Material Accounting Period (calendar year). |
| 8.10c Internal Overdraws (period to make up) | Conformance | The Entity's system does not allow transferring of an Internal Overdraw to the next Material Accounting Period (calendar year). |
| 8.11a Positive Balance (carry over) | Conformance | The Entity's Material Accounting System is able to clearly identify any carry over of a Positive Balance of output CoC Material at the end of Material Accounting Period to the subsequent Material Accounting Period. |
| 8.11b Positive Balance (expiry) | Conformance | The Entity's Material Accounting System ensures that the Positive Balance, generated in one Material Accounting Period and carried over to the subsequent Material Accounting Period, will expire at the end of that subsequent Period if not drawn down. |

| CRITERION | RATING | COMMENT |
|---------------------------------------|-------------|---|
| 9.1 Shipments and transfers | Conformance | The Entity's system ensures that the CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. |
| 9.2a Date of issue | Conformance | The Entity's system ensures that CoC Documents include the Date of issue of the CoC Document. |
| 9.2b Reference number | Conformance | The Entity's system ensures that CoC Documents include the Reference number for the CoC Document, which is linked to the Entity's Material Accounting System for verification purposes. |
| 9.2c Issuing Entity | Conformance | The Entity's system ensures that CoC Documents include the identity, address and CoC Certification number of the Entity issuing the CoC Document. |
| 9.2d Receiving customer | Conformance | The Entity's system ensures that CoC Documents include the identity and address of the customer receiving the CoC Material, and if it is another CoC Certified Entity, their CoC Certification number. |
| 9.2e Responsible employee | Conformance | The Entity's system ensures that CoC Documents include the information on the Entity's responsible employee who can verify information in the CoC Document. |
| 9.2f Conformance statement | Conformance | The Entity's system ensures that CoC Documents include a statement confirming that "The information provided in the CoC Document is in conformance with the ASI CoC Standard". |
| 9.2g Type of CoC Material | Conformance | The Entity's system ensures that CoC Documents include the information on the Type of CoC Material in the shipment. |
| 9.2h Mass of CoC Material | Conformance | The Entity's system ensures that CoC Documents include the information on the Mass of CoC Material in the shipment. |
| 9.2i Mass of total material | Conformance | The Entity's system ensures that CoC Documents include the information on the Mass of total Material in the shipment. |
| 9.3a Sustainability Data (optional) | Conformance | The Entity obtains relevant information and is able to include the applicable Sustainability Data in the CoC Document for that CoC Material: the average intensity of GHG emissions (scope 1 and scope 2) in tonnes of CO ₂ - _{eq} per metric tonne of ASI Aluminium, from the production of ASI Aluminium. |
| 9.3b Sustainability Data (passing on) | Conformance | The Entity obtains relevant information and is able to include the applicable Sustainability Data in the CoC |

| CRITERION | RATING | COMMENT |
|---|-------------|--|
| | | Document for that CoC Material: where available, the average intensity of GHG emissions (scope 1 and 2) in tones of CO ₂ -eq per metric tonne of ASI Aluminium. |
| 9.3c Post-Casthouse ASI Certification status | Conformance | The Entity obtains relevant information and is able to include the applicable Sustainability Data in the CoC Document for that CoC Material. |
| 9.4 Supplementary Information (optional) | Conformance | The Entity's system ensures that the Supplementary Information can be supported by objective evidence. |
| 9.5 Response to verification requests | Conformance | The Entity's system enables it to respond to reasonable requests for verification of information in CoC Documents issued by the Entity. |
| 9.6 Error management | Conformance | The Entity's system includes documentation of the error and the agreed steps taken to correct it, and implement actions to avoid its recurrence. |
| 10 RECEIVING COC DOCUMENTS | | |
| 10.1 Verify required information included | Conformance | The Entity's system includes verification that of all required information received in CoC Documents, as set out in criteria 9.2 and 9.3, has been included. |
| 10.2 Verify consistency with shipments | Conformance | The Entity's system includes verification of the consistency of received CoC Documents with the accompanying CoC Material before recording information in the Entity's Material Accounting System. |
| 10.3 Verify supplier CoC Certification status | Conformance | The Entity's system is able to verify the validity and scope of the supplier's ASI CoC Certification for any changes that might affect the status of the supplied CoC Material. |
| 10.4 Error management | Conformance | The Entity's system is able to correct the error discovered after CoC Material has been received, and implement actions to avoid a recurrence. |
| 11 MARKET CREDITS SYSTEM: ASI CREDITS | | |
| 11.1a Material Accounting System – allocation | Conformance | The Entity's system ensures that the amount of ASI Aluminium allocated to ASI Credits is accounted for in the Entity's Material Accounting System. |
| 11.1b Link to Casthouse Products | Conformance | The Entity's system ensures that its Material Accounting System can link unique identification numbers for the Casthouse Products from which ASI Aluminium has been allocated to ASI Credits. |

| CRITERION | RATING | COMMENT |
|--|----------------|--|
| 11.1c No double counting | Conformance | The Entity's system ensures that ASI Credits allocated from ASI Aluminium are not Double Counted. |
| 11.1d No Positive Balance for ASI Credits | Conformance | The Entity's system ensures that ASI Credits are allocated and issued within a Material Accounting Period. A Positive Balance of ASI Credits shall not be carried over to a subsequent Material Accounting Period. |
| 11.2a Date of issue | Conformance | The Entity's system ensures issuing of ASI Credit Certificates which includes the Date of issue of the ASI Credit Certificate. |
| 11.2b Reference number | Conformance | The Entity's system ensures issuing of ASI Credit Certificates, which includes the Reference number for the ASI Credit Certificate, which is linked to the Entity's Material Accounting System for verification purposes. |
| 11.2c Issuing Entity | Conformance | The Entity's system ensures issuing of ASI Credit Certificates, which includes the information on identity, address, contact email address and CoC Certification number of the Entity issuing the ASI Credit Certificate. |
| 11.2d Receiving Entity | Conformance | The Entity's system ensures issuing of ASI Credit Certificates, which includes the information on identity, address, contact email address and CoC Certification number of the Entity receiving the ASI Credit Certificate. |
| 11.2e Conformance statement | Conformance | The Entity's system ensures issuing of ASI Credit Certificates, which includes a statement confirming that "The information provided in the ASI Credits Certificate is in conformance with the ASI CoC Standard". |
| 11.2f ASI Credits statement | Conformance | The Entity's system ensures issuing of ASI Credit Certificates, which includes a statement that "ASI Credits may not be re-traded. ASI Credits may not be allocated to physical products or otherwise claimed as ASI Aluminium". |
| 11.2g Quantity | Conformance | The Entity's system ensures issuing of ASI Credit Certificates, which includes the information on Quantity of ASI Credits. |
| 11.3a CoC Certification Scope – purchasing ASI Credits | Not Applicable | The Entity does not plan to purchase ASI Credits. |

| CRITERION | RATING | COMMENT |
|---|----------------|---|
| 11.3b Material Accounting System – purchasing | Not Applicable | This criterion is not applicable to the Entity's certification scope. |
| 11.3c Expiry | Not Applicable | This criterion is not applicable to the Entity's certification scope. |
| 11.3d No re-trading | Not Applicable | The Entity does not plan to purchase ASI Credits. |
| 11.3e No allocation to physical products | Not Applicable | The Entity does not plan to purchase ASI Credits. |
| 11.3f Verify supplier CoC Certification status | Not Applicable | The Entity does not plan to purchase ASI Credits. |
| 11.3g Five years maximum for ASI Credits purchasing | Not Applicable | The Entity does not plan to purchase ASI Credits. |
| 12 CLAIMS AND COMMUNICATIONS | | |
| 12.1a ASI Claims Guide | Conformance | The Entity's system ensures that claims and/or representations about CoC Material outside of CoC Documents, or about ASI Credits outside of ASI Credits Certificates, are made in a manner and format consistent with the ASI Claims Guide. |
| 12.1b Verifiable evidence | Conformance | The Entity's system ensures that there is a verifiable evidence to support the claims and/or representations made. |
| 12.1c Employee training | Conformance | The Entity's system ensures that appropriate training is provided for the relevant employees to properly understand and communicate the claims and/or representations. |