

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# RIO TINTO

CERTIFICATE  
NUMBER

4

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

BNQ

DATE OF ISSUE

12 JULY 2018

DATE OF EXPIRY

11 JULY 2021

CERTIFIED SINCE

12 JULY 2018

AUTHORISED BY

A handwritten signature in white ink on a dark grey background. The signature is stylized and appears to be 'J. H.' followed by a long horizontal line.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

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

CERTIFICATION SCOPE

Gove Bauxite Mine and related port facilities and power station (Gove, Northern Territory, Australia), Weipa Bauxite Mines, related port facilities and power stations (Weipa, Queensland, Australia), Vaudreuil Alumina Refinery (Saguenay QC, Canada), Yarwun Alumina Refinery (Yarwun, QLD, Australia), Alma Smelter (Alma QC, Canada), AP-60 Smelter (Saguenay QC, Canada), Arvida Smelter (Saguenay QC, Canada), Bell Bay Aluminium Smelter (George Town, Tasmania, Australia), Grande-Baie Smelter (Saguenay QC, Canada), Laterriere Smelter (Saguenay QC, Canada), Kitimat Smelter (Kitimat BC), PLS (Specialised Casthouse) (Saguenay QC, Canada), IPSF (Port and Rails) (Saguenay QC, Canada), New Zealand Aluminium Smelter (Invercargill, New Zealand), Headquarters (Brisbane, QLD, Australia), and Headquarters (Saguenay QC, Canada).

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# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

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### OVERVIEW

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MEMBER NAME            Rio Tinto

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ENTITY NAME            Rio Tinto

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CERTIFICATION SCOPE

- Gove Bauxite Mine including its port facilities and power station (Gove Northern Territory, Australia)
- Weipa Bauxite Mines, related port facilities and power stations (Weipa, Queensland, Australia)
- Vaudreuil Alumina Refinery (Saguenay QC, Canada)
- Yarwun Alumina Refinery (Yarwun, QLD, Australia)
- Alma Smelter (Alma QC, Canada)
- AP-60 Smelter (Saguenay QC, Canada)
- Arvida Smelter (Saguenay QC, Canada)
- Bell Bay Aluminium Smelter (George Town, Tasmania, Australia)
- Grande-Baie Smelter (Saguenay QC, Canada)
- Laterriere Smelter (Saguenay QC, Canada)
- Kitimat Smelter (Kitimat BC)
- PLS (Specialised Casthouse) (Saguenay QC, Canada)
- IPSF (Port and Rails) (Saguenay QC, Canada)
- New Zealand Aluminium Smelter (Invercargill, New Zealand)
- Headquarters (Brisbane, QLD, Australia)
- Headquarters (Saguenay QC, Canada)

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SUPPLY CHAIN ACTIVITIES

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Casthouses
- Aluminium Re-melting / Refining

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ASI STANDARD            • Chain of Custody Standard V1

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AUDIT TYPE

- Certification Audit (13 February 2018 – 29 April 2018)
- First Scope Change Audit (4 – 12 July 2019)
- Second Scope Change Audit (18 September 2019 – 28 October 2019)

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AUDIT FIRM	BNQ
AUDIT DATE	<ul style="list-style-type: none"> <li>• 13 February 2018 – 29 April 2018 (Certification Audit)</li> <li>• 4 – 12 July 2019 (First Scope Change Audit)</li> <li>• 18 September 2019 – 28 October 2019 (Second Scope Change Audit)</li> </ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"> <li>• 15 June 2018 (Certification Audit)</li> <li>• 10 September 2019 (First Scope Change Audit)</li> <li>• 22 November 2019 (Second Scope Change Audit)</li> </ul>
AUDIT SCOPE	<p><u>Initial Certification Audit</u></p> <ul style="list-style-type: none"> <li>• Gove Bauxite Mine including its port facilities and power station (Gove Northern Territory, Australia)</li> <li>• Vaudreuil Alumina Refinery (Saguenay QC, Canada)</li> <li>• AP-60 Smelter (Saguenay QC, Canada)</li> <li>• Grande-Baie Smelter (Saguenay QC, Canada)</li> <li>• Laterriere Smelter (Saguenay QC, Canada)</li> <li>• PLS Specialised Casthouse (Saguenay QC, Canada)</li> <li>• IPSF (Port and Rails) (Saguenay QC, Canada)</li> <li>• Headquarters (Saguenay QC, Canada)</li> </ul> <p>All relevant supply chain activities, and criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>First Scope Change Audit</u></p> <ul style="list-style-type: none"> <li>• Kitimat Smelter (Kitimat BC, Canada)</li> </ul> <p>All relevant supply chain activities, and criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Second Scope Change Audit</u></p> <ul style="list-style-type: none"> <li>• Weipa Bauxite Mines, related port facilities and power stations (Weipa, Queensland, Australia)</li> <li>• Yarwun Alumina Refinery (Yarwun, QLD, Australia)</li> <li>• Bell Bay Aluminium Smelter (George Town, Tasmania, Australia)</li> <li>• New Zealand Aluminium Smelter (Invercargill, New Zealand)</li> <li>• Headquarters (Brisbane, QLD, Australia)</li> </ul> <p>All relevant supply chain activities, and criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"> <li>• Certification</li> </ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li> <li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li> </ul>

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- 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	12 July 2018 – 11 July 2021
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	10 January 2020
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CERTIFICATION NUMBER	4
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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	The Entity is an ASI Member and is committed to comply with ASI's membership obligations and the ASI Complaints Mechanism. The evidence provided by the Entity shows that it is an ASI Production and Transformation member and that it has committed to ASI's membership obligations. Rio Tinto appears in the Production and Transformation Member Class in the ASI Website.
1.2 Management system	Conformance	The Entity has a Management System that addresses all applicable requirements of the Chain of Custody (CoC) Standard, in all facilities under its control related to the Management of the CoC Material. The evidence provided shows that there is an effective Management System in place. The evidence also shows that Rio Tinto Aluminium (RTA) provides adequate resources to maintain the effectiveness of its Management System. It has procedures in place to support the CoC Management System. As well, the Management System includes a robust material accounting system.
1.3 Management system reviews	Conformance	The Entity ensures that the Management System are periodically reviewed and updated. The evidence provided shows that the Management System in place is reviewed annually (RTA ASI CoC Procedure section 6.1.3). The ASI CoC Management System Procedure has been displayed, implemented and upgraded for improvement purposes. The Entity encourages its staff to provide suggestions for improvements.
1.4 Management representative	Conformance	The Entity has nominated a Management Representative having overall responsibility and authority for the Entity's conformance with all applicable requirements of the CoC Standard. Based on the evidence provided, the Entity has a designated responsible manager who oversees ASI conformance: The GM Project, Energy and Climate Change, Atlantic.
1.5 Training	Conformance	The Entity has established and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities under the CoC

CRITERION	RATING	COMMENT
		Standard. The Entity has developed and implemented policies, systems, procedures and processes that conform to the communications and training measures requirement. The Entity has implemented processes that allow efficient communications. As well, relevant personnel are competent and adequately aware and trained.
1.6 Record keeping	Conformance	The Entity maintains up-to-date records (Management System) covering all applicable requirements of the CoC Standard. The Entity has adequate record management practices. Their procedures comply with ASI CoC requirements as well as the 5-year record retainer policy.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	This criterion is not applicable for an initial certification or a scope extension audit which is equivalent to an initial certification audit for a new site. It will be systematically audited by the BNQ in the first upcoming surveillance audit.
1.7b Reporting to ASI (Input Percentage)	Not Applicable	This criterion is not applicable for an initial certification or a scope extension audit which is equivalent to an initial certification audit for a new site. It will be systematically audited by the BNQ in the first upcoming surveillance audit.
1.7c Reporting to ASI (Positive Balance)	Not Applicable	This criterion is not applicable for an initial certification or a scope extension audit which is equivalent to an initial certification audit for a new site. It will be systematically audited by the BNQ in the first upcoming surveillance audit.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	This criterion is not applicable for an initial certification or a scope extension audit which is equivalent to an initial certification audit for a new site. It will be systematically audited by the BNQ in the first upcoming surveillance audit.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	This criterion is not applicable for an initial certification or a scope extension audit which is equivalent to an initial certification audit for a new site. It will be systematically audited by the BNQ in the first upcoming surveillance audit.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This criterion is not applicable for an initial certification or a scope extension audit which is equivalent to an initial certification audit for a new site. It will be systematically audited by the BNQ in the first upcoming surveillance audit.

CRITERION	RATING	COMMENT
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	This criterion is not applicable for an initial certification or a scope extension audit which is equivalent to an initial certification audit for a new site. It will be systematically audited by the BNQ in the first upcoming surveillance audit.
<b>2 OUTSOURCING CONTRACTORS</b>		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	There are no outsourcing contractors involved in the RTA ASI CoC. This criterion is not applicable to the Entity's certification scope. The only outsourcing contractors are the ones that treat scraps, which are out of scope.
2.2a Control of CoC Material	Not Applicable	There are no outsourcing contractors involved in the RTA ASI CoC. This criterion is not applicable to the Entity's certification scope. The only outsourcing contractors are the ones that treat scraps, which are out of scope.
2.2b No further outsourcing	Not Applicable	There are no outsourcing contractors involved in the RTA ASI CoC. This criterion is not applicable to the Entity's certification scope. The only outsourcing contractors are the ones that treat scraps, which are out of scope.
2.2c Risk assessment	Not Applicable	There are no outsourcing contractors involved in the RTA ASI CoC. This criterion is not applicable to the Entity's certification scope. The only outsourcing contractors are the ones that treat scraps, which are out of scope.
2.3 Output Quantity	Not Applicable	There are no outsourcing contractors involved in the RTA ASI CoC. This criterion is not applicable to the Entity's certification scope. The only outsourcing contractors are the ones that treat scraps, which are out of scope.
2.4 Verification and record-keeping	Not Applicable	There are no outsourcing contractors involved in the RTA ASI CoC. This criterion is not applicable to the Entity's certification scope. The only outsourcing contractors are the ones that treat scraps, which are out of scope.
2.5 Error management	Not Applicable	This criterion is not applicable for an initial certification or a scope extension audit which is equivalent to an initial certification audit for a new site. It will be systematically audited by the BNQ in the first upcoming surveillance audit.
<b>3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL</b>		

CRITERION	RATING	COMMENT
3.1a CoC Certification Scope – Bauxite Mining	Conformance	Bauxite mining activities are ASI Performance Standard (PS) certified and are within the Entity's CoC certification scope. The PS certification shows that the Entity respects ASI requirements applicable for bauxite mining activities. The Weipa bauxite mine and the Gove bauxite mine are owned and controlled by the ASI Member Rio Tinto Aluminium (RTA).
3.1b ASI Performance Standard – Bauxite Mining	Conformance	The Entity has systems in place to ensure that ASI Bauxite is produced only from bauxite mines that are certified against the ASI Performance Standard. The Weipa and Gove bauxite mining activities are ASI PS certified. The PS certification mine shows that the Entity respects ASI applicable requirements for bauxite mining activities. See the ASI website for valid RTA ASI-PS certificates for Canadian (No.1), Australian and New Zealand (Pacific) facilities (No.2).
3.2a CoC Certification Scope – Alumina Refining	Conformance	The Entity has systems in place to ensure that ASI Alumina is produced only from certified alumina refiners or that are within the Entity's CoC Certification Scope or in another Certified Entity. The Yarwun Alumina Refinery is legally owned and controlled by the ASI Entity (RTA). Alumina Refining is part of the Entity's CoC certification scope. The PS certification including the Yarwun Alumina Refinery shows that the Entity respects ASI applicable requirements for Alumina Refining activities. The Yarwun Alumina Refinery is PS Certified and is within the CoC certification scope. See the ASI website for valid RTA ASI-PS certificates for Canadian (No.1), Australian and New Zealand (Pacific) facilities (No.2)
3.2b ASI Performance Standard – Alumina Refining	Conformance	The Entity has systems in place to ensure that ASI Alumina is produced only from alumina refiners that are certified against the ASI Performance Standard. Alumina is produced from the RTA Yarwun (Australia) which are certified against the ASI Performance Standard supporting responsible production. See the ASI website for valid RTA ASI-PS certificates for Canadian (No.1), Australian and New Zealand (Pacific) facilities (No.2)
3.3a CoC Certification Scope – Aluminium Smelting	Conformance	Both the Bell Bay Smelter and the New Zealand Aluminium Smelter (NZAS) are legally owned



CRITERION	RATING	COMMENT
		and controlled by the ASI Entity RTA. Aluminium smelting activities are ASI PS certified and are within the Entity's CoC certification scope. The PS certification shows that the Entity respects ASI applicable requirements for Aluminium Smelting activities. See the ASI website for valid RTA ASI-PS certificates for Canadian (No.1), Australian and New Zealand (Pacific) facilities (No.2)
3.3b ASI Performance Standard – Aluminium Smelting	Conformance	The Entity has systems in place to ensure that ASI Liquid Metal is produced only from aluminium smelters that are certified against the ASI Performance Standard. Aluminium smelting activities are ASI PS certified and are within the Entity's CoC certification scope. The PS certification shows that the Entity respects ASI applicable requirements for Aluminium Smelting activities. See the ASI website for valid RTA ASI-PS certificates for Canadian (No.1), Australian and New Zealand (Pacific) facilities (No.2)
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, since the scope refers to a primary aluminium chain of custody. Hence, the starting point of the chain is a bauxite mine, not a re-melter/refiner as would be expected for a recycled aluminium chain. Moreover, pre-consumer scraps are not considered in casthouse inputs nor in smelter/casthouse outputs for mass balance purposes.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Not Applicable	This criterion is not applicable to the Entity's certification scope, since the scope refers to a primary aluminium chain of custody. Hence, the starting point of the chain is a bauxite mine, not a re-melter/refiner as would be expected for a recycled aluminium chain. Moreover, pre-consumer scraps are not considered in casthouse inputs nor in smelter/casthouse outputs for mass balance purposes.
4.2a Pre-Consumer Scrap and Dross	Not Applicable	This criterion is not applicable to the Entity's certification scope, since the scope refers to a primary aluminium chain of custody. Hence, the starting point of the chain is a bauxite mine, not a re-melter/refiner as would be expected for a recycled aluminium chain. Moreover, pre-

CRITERION	RATING	COMMENT
		consumer scraps are not considered in casthouse inputs nor in smelter/casthouse outputs for mass balance purposes.
4.2b Post-Consumer Scrap	Not Applicable	This criterion is not applicable to the Entity's certification scope, since the scope refers to a primary aluminium chain of custody. Hence, the starting point of the chain is a bauxite mine, not a re-melter/refiner as would be expected for a recycled aluminium chain. Moreover, pre-consumer scraps are not considered in casthouse inputs nor in smelter/casthouse outputs for mass balance purposes.
4.3a Supplier records	Not Applicable	This criterion is not applicable to the Entity's certification scope, since the scope refers to a primary aluminium chain of custody. Hence, the starting point of the chain is a bauxite mine, not a re-melter/refiner as would be expected for a recycled aluminium chain. Moreover, pre-consumer scraps are not considered in casthouse inputs nor in smelter/casthouse outputs for mass balance purposes.
4.3b Cash payments	Not Applicable	This criterion is not applicable to the Entity's certification scope, since the scope refers to a primary aluminium chain of custody. Hence, the starting point of the chain is a bauxite mine, not a re-melter/refiner as would be expected for a recycled aluminium chain. Moreover, pre-consumer scraps are not considered in casthouse inputs nor in smelter/casthouse outputs for mass balance purposes.

#### 5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a CoC Certification Scope – Casthouses	Conformance	Both the Bell Bay Smelter and the New Zealand Aluminium Smelter (NZAS) and their casthouses are legally owned and controlled by the ASI Entity RTA. Casthouse products are part of the Entity's CoC certification scope. The Entity's procedures allow for adequate traceability of material. The targeted RTA casthouses are ASI-PS certified. See the ASI website for valid RTA ASI-PS certificates for Canadian (No.1), Australian and New Zealand (Pacific) facilities (No.2).
5.1b ASI Performance Standard – Casthouses	Conformance	Casthouse products are part of the Entity's CoC certification scope. The Entity's procedures allow for adequate traceability of material. The targeted RTA casthouses are ASI-PS certified.

CRITERION	RATING	COMMENT
		See the ASI website for valid RTA ASI-PS certificates for Canadian (No.1), Australian and New Zealand (Pacific) facilities (No.2).
5.2 Casthouse Products	Conformance	The Entity's material accounting system provides for traceability of material of its CoC. The Entity uses unique identification numbers. The system in place conforms the ASI CoC requirement.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.1b ASI Performance Standard – Post-Casthouse	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.1c Sourcing ASI Aluminium	Not Applicable	This criterion is not applicable to the Entity's certification scope.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Minor Non-Conformance	<p><u>RTA Pacific sites finding:</u> This open Minor Non-conformance (NC) only applies to RTA Atlantic (Canadian) sites and was raised at the first initial certification audit of this CoC. RTA Pacific Sites are in conformance with this criterion for this scope extension audit. According to the supplied evidence and all relevant testimonials, the BNQ can conclude the following about the targeted Pacific Sites: The responsible sourcing policy of RTA has been communicated by email to all external alumina and bauxite suppliers in 2018-2019. That policy takes account of the required Performance Standard criteria.</p> <p><u>RTA Atlantic finding and Non-Conformance:</u> Context: The Entity has long-standing and sustainable procurement processes for bauxite and alumina in line with international best practices in the areas of anti-corruption, responsible sourcing and the protection of human rights while considering conflict affected areas or at high risk of conflict. The Entity's requirements in these areas have long been communicated to relevant suppliers through a variety of means including:</p> <ul style="list-style-type: none"> <li>• long-term supply contracts signed before RTA initiated its ASI certification process;</li> <li>• statutory and exhaustive visits of the production facilities concerned;</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>active participation on the board of directors and/or technical committees of suppliers partially owned by the ASI member Rio Tinto (the Entity's corporation).</li> </ul> <p>The Entity therefore maintains sustainable sourcing partnerships and primarily with other corporations that also have high standards of sustainable management of international calibre. Rio Tinto also has a due diligence review process when it has to qualify a new supplier or renew an existing supply contract.</p> <p>Minor Non-Conformance: With the exception of suppliers that are Rio Tinto's Joint-Ventures, the demonstration of conformity of due diligence processes with respect to ASI's requirements is difficult to achieve for RTA's long-term suppliers regarding recent communication of a Responsible sourcing policy compliant with the ASI Chain of Custody (CoC).</p>
7.1b Responsible sourcing policy (responsible sourcing)		<p><u>RTA Pacific sites finding:</u> This open Minor Non-conformance (NC) only applies to RTA Atlantic (Canadian) sites and was raised at the first initial certification audit of this CoC. RTA Pacific Sites are in conformance with this criterion for this scope extension audit. According to the supplied evidence and all relevant testimonials, the BNQ can conclude the following about the targeted Pacific Sites: The responsible sourcing policy of RTA has been communicated by email to all external alumina and bauxite suppliers in 2018-2019. That policy takes account of the required Performance Standard criteria.</p> <p><u>RTA Atlantic finding and Non-Conformance:</u> Context: The Entity has long-standing and sustainable procurement processes for bauxite and alumina in line with international best practices in the areas of anti-corruption, responsible sourcing and the protection of human rights while considering conflict affected areas or at high risk of conflict. The Entity's requirements in these areas have long been communicated to relevant suppliers through a variety of means including:</p> <ul style="list-style-type: none"> <li>long-term supply contracts signed before RTA initiated its ASI certification process;</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>• statutory and exhaustive visits of the production facilities concerned;</li> <li>• active participation on the board of directors and/or technical committees of suppliers partially owned by the ASI member Rio Tinto (the Entity's corporation).</li> </ul> <p>The Entity therefore maintains sustainable sourcing partnerships and primarily with other corporations that also have high standards of sustainable management of international calibre. Rio Tinto also has a due diligence review process when it has to qualify a new supplier or renew an existing supply contract.</p> <p>Minor Non-Conformance: With the exception of suppliers that are Rio Tinto's Joint-Ventures, the demonstration of conformity of due diligence processes with respect to ASI's requirements is difficult to achieve for RTA's long-term suppliers regarding recent communication of a Responsible sourcing policy compliant with the ASI Chain of Custody (CoC).</p>
7.1c Responsible sourcing policy (human rights due diligence)		<p><u>RTA Pacific sites finding:</u> This open Minor Non-conformance (NC) only applies to RTA Atlantic (Canadian) sites and was raised at the first initial certification audit of this CoC. RTA Pacific Sites are in conformance with this criterion for this scope extension audit. According to the supplied evidence and all relevant testimonials, the BNQ can conclude the following about the targeted Pacific Sites: The responsible sourcing policy of RTA has been communicated by email to all external alumina and bauxite suppliers in 2018-2019. That policy takes account of the required Performance Standard criteria.</p> <p><u>RTA Atlantic finding and Non-Conformance:</u> Context: The Entity has long-standing and sustainable procurement processes for bauxite and alumina in line with international best practices in the areas of anti-corruption, responsible sourcing and the protection of human rights while considering conflict affected areas or at high risk of conflict. The Entity's requirements in these areas have long been communicated to relevant suppliers through a variety of means including:</p>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>• long-term supply contracts signed before RTA initiated its ASI certification process;</li> <li>• statutory and exhaustive visits of the production facilities concerned;</li> <li>• active participation on the board of directors and/or technical committees of suppliers partially owned by the ASI member Rio Tinto (the Entity's corporation).</li> </ul> <p>The Entity therefore maintains sustainable sourcing partnerships and primarily with other corporations that also have high standards of sustainable management of international calibre. Rio Tinto also has a due diligence review process when it has to qualify a new supplier or renew an existing supply contract.</p> <p>Minor Non-Conformance: With the exception of suppliers that are Rio Tinto's Joint-Ventures, the demonstration of conformity of due diligence processes with respect to ASI's requirements is difficult to achieve for RTA's long-term suppliers regarding recent communication of a Responsible sourcing policy compliant with the ASI Chain of Custody (CoC).</p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)		<p><u>RTA Pacific sites finding:</u> This open Minor Non-conformance (NC) only applies to RTA Atlantic (Canadian) sites and was raised at the first initial certification audit of this CoC. RTA Pacific Sites are in conformance with this criterion for this scope extension audit. According to the supplied evidence and all relevant testimonials, the BNQ can conclude the following about the targeted Pacific Sites: The responsible sourcing policy of RTA has been communicated by email to all external alumina and bauxite suppliers in 2018-2019. That policy takes account of the required Performance Standard criteria.</p> <p><u>RTA Atlantic finding and Non-Conformance:</u> Context: The Entity has long-standing and sustainable procurement processes for bauxite and alumina in line with international best practices in the areas of anti-corruption, responsible sourcing and the protection of human rights while considering conflict affected areas or at high risk of conflict. The Entity's requirements in these areas have long been</p>

CRITERION	RATING	COMMENT
		<p>communicated to relevant suppliers through a variety of means including:</p> <ul style="list-style-type: none"> <li>• long-term supply contracts signed before RTA initiated its ASI certification process;</li> <li>• statutory and exhaustive visits of the production facilities concerned;</li> <li>• active participation on the board of directors and/or technical committees of suppliers partially owned by the ASI member Rio Tinto (the Entity's corporation).</li> </ul> <p>The Entity therefore maintains sustainable sourcing partnerships and primarily with other corporations that also have high standards of sustainable management of international calibre. Rio Tinto also has a due diligence review process when it has to qualify a new supplier or renew an existing supply contract.</p> <p>Minor Non-Conformance: With the exception of suppliers that are Rio Tinto's Joint-Ventures, the demonstration of conformity of due diligence processes with respect to ASI's requirements is difficult to achieve for RTA's long-term suppliers regarding recent communication of a Responsible sourcing policy compliant with the ASI Chain of Custody (CoC).</p>
7.2 Risk assessment	Minor Non-Conformance	<p><u>RTA Pacific sites finding:</u> This open NC only applies to RTA Atlantic (Canadian) sites and was raised at the first initial certification audit of this CoC. RTA Pacific Sites are in conformance with this criterion for this scope extension audit. According to the supplied evidence and all relevant testimonials, the BNQ can conclude the following about the targeted Pacific Sites: All external suppliers of Bauxite and Alumina have been assessed through the Know Your Supplier process. The Know Your Supplier process involves determination of risk and mitigation measures relevant to the level of risk. The responsible sourcing policy has been communicated to all external Bauxite and Alumina suppliers.</p> <p><u>RTA Atlantic finding and Non-Conformance:</u> Context: The Entity maintains sustainable sourcing partnerships and primarily with other corporations that also have high standards of sustainable management of international calibre.</p>

CRITERION	RATING	COMMENT
		<p>Rio Tinto also has a due diligence review process when it has to qualify a new supplier or sign a new supply agreement with a former supplier.</p> <p>Minor Non-Conformance: With the exception of suppliers that are Rio Tinto's Joint-Ventures, the long-term relationship with the major suppliers of bauxite and alumina and the fact that they have not yet been subject to a recent due diligence review makes it more difficult to demonstrate:</p> <ul style="list-style-type: none"> <li>• the assessment of non-compliance risk of its targeted suppliers of bauxite and alumina with the Responsible Procurement Policy for the ASI chain of custody (CoC);</li> <li>• documentation of findings from these risk analyses and,</li> <li>• the implementation of measurable risk mitigation plans (if applicable).</li> </ul>
7.3 Complaints mechanism	Conformance	<p>The Entity has 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 Aluminum supply chain. The Entity has a documented complaints mechanism in place. Such process is available to personnel, interested parties, as well as stakeholders. RT has a monthly due diligence report. Also, the ASI PS Management System provides information on non-compliances and liabilities in RTA's annual sustainability report. The Entity has thus developed and implemented policies, systems, procedures and processes that conform to the standard. The Entity is ASI PS certified. See the ASI website for valid ASI PS certificates.</p>
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	<p>RTA's CoC mass balance process provides input quantity as well as output quantity of CoC material and non-CoC material, by mass for each of the aluminium value chain element included in the Entity's CoC certification scope. The Mass Balance System has been tested with simulated material and these tests were conclusive and helped demonstrate the adequate functionalities of this matrix.</p>



CRITERION	RATING	COMMENT
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	RTA's CoC mass balance process respects the maximum 12 months accounting period, since the chosen accounting period is one (1) year.
8.4 Input Percentage	Conformance	The Entity calculates and records the Input Percentage for a given Material Accounting Period. The Entity's input percentage calculations respect ASI CoC requirements. The Entity uses consistent units and adequate material conversion rates in its calculations. RTA's CoC mass balance process provides input quantity as well as output quantity of CoC material and non-CoC material, by mass for each of the aluminium chain value included in the Entity's CoC certification scope. The Mass Balance System has been tested with simulated material and these tests were conclusive and helped demonstrate the adequate functionalities of this matrix.
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 uses the Input Percentage for the given Material Accounting Period to determine the Output Quantity of CoC Material, by mass. Entity's input quantity is determined using the input percentage as required in 8.4. The Entity's input percentage calculations respect ASI CoC requirements. The Entity uses consistent units and adequate material conversion rates in its calculations. RTA's CoC mass balance process provides input quantity as well as output quantity of CoC material and non-CoC material, by mass for each of the aluminium chain value included in the Entity's CoC certification scope. The Mass Balance System has been tested with simulated material and these tests were conclusive and helped demonstrate the adequate functionalities of this matrix.

CRITERION	RATING	COMMENT
8.7 Output Quantity designation	Conformance	Entity's output quantity is designated as 100% CoC material. The Mass Balance System is designed to do so. RTA processes in place allow for adequate traceability of CoC material. The Entity's input percentage calculations respect ASI CoC requirements. The Entity uses consistent units and adequate material conversion rates in its calculations. RTA's CoC mass balance process provides input quantity as well as output quantity of CoC material and non-CoC material, by mass for each of the aluminium chain value included in the Entity's CoC certification scope. The Mass Balance System has been tested with simulated material and these tests were conclusive and helped demonstrate the adequate functionalities of this matrix.
8.8 Output Quantity – Pre-Consumer Scrap	Not Applicable	This indicator is not applicable to the Entity's certification scope. Eligible Scrap is not included in the Certification Scope.
8.9 Outputs not exceed inputs	Conformance	The Entity's Material Accounting System ensures that the total output of CoC Material does not proportionally exceed the Input Percentage as applied to total input of CoC Material over the Material Accounting Period. The Entity's efficient mass balance process allows for adequate traceability of process material. The Entity's process allows for appropriate CoC output control. As well, verification (tests and simulations) have shown that the output does not proportionally exceed inputs of CoC Material.
8.10a Internal Overdraws (not exceed 20%)	Conformance	RTA's ASI CoC mass balance process allows for an internal overdraw not exceeding 20% of total input. The mass balance matrix has been tested.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	Processes also ensure that the internal overdraw does not exceed the amount of CoC material that is needed by the force majeure. The mass balance matrix has been tested.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity's process includes the verification that the overdraw is made up within the subsequent accounting period. The mass balance matrix has been tested.

CRITERION	RATING	COMMENT
8.11a Positive Balance (carry over)	Conformance	The Entity's CoC mass balance process can clearly identify any carry over of a Positive Balance. The mass balance matrix has been tested.
8.11b Positive Balance (expiry)	Conformance	Positive Balances from the Entity's CoC mass balance process expires at the end of the subsequent Material Accounting Period if not drawn down. The mass balance process includes the documentation of drawn down and/or expiry of a carried over Positive Balance.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity's CoC process covers the appropriate documentation of shipment or transfer material. Documents are prepared from standard templates. The following elements were already audited, in both Pacific and Atlantic Operations: <ul style="list-style-type: none"> <li>• Real Non-CoC Shipments' Expedition Documents without CoC claims (to see how they worked)</li> <li>• Blank Specimen of ASI CoC Expedition Documents (to see how ASI CoC Material will be shipped once certified).</li> </ul>
9.2a Date of issue	Conformance	The Entity's CoC process covers the appropriate documentation of shipment or transfer material including the date of issue. The following elements were already audited, in both Pacific and Atlantic Operations: <ul style="list-style-type: none"> <li>• Real Non-CoC Shipments' Expedition Documents without CoC claims (to see how they worked)</li> <li>• Blank Specimen of ASI CoC Expedition Documents (to see how ASI CoC Material will be shipped once certified).</li> </ul>
9.2b Reference number	Conformance	The Entity ensures that CoC Documents include a reference number for the CoC Document, which is linked to the Entity's Material Accounting System for verification purposes. The Entity's CoC documentation includes the required information. The following elements were already audited, in both Pacific and Atlantic Operations: <ul style="list-style-type: none"> <li>• Real Non-CoC Shipments' Expedition Documents without CoC claims (to see how they worked)</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>Blank Specimen of ASI CoC Expedition Documents (to see how ASI CoC Material will be shipped once certified).</li> </ul>
9.2c Issuing Entity	Conformance	<p>The Entity ensures that CoC Documents include the Entity's identity, address and CoC Certification number. The identity, address and CoC Certification number of the Entity issuing the CoC Document, are included in RTA's CoC documents. The following elements were already audited, in both Pacific and Atlantic Operations:</p> <ul style="list-style-type: none"> <li>Real Non-CoC Shipments' Expedition Documents without CoC claims (to see how they worked)</li> <li>Blank Specimen of ASI CoC Expedition Documents (to see how ASI CoC Material will be shipped once certified).</li> </ul>
9.2d Receiving customer	Conformance	<p>The Entity 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. The identity and address of the customer receiving the CoC Material are included on the specimen CoC document. The following elements were already audited, in both Pacific and Atlantic Operations:</p> <ul style="list-style-type: none"> <li>Real Non-CoC Shipments' Expedition Documents without CoC claims (to see how they worked)</li> <li>Blank Specimen of ASI CoC Expedition Documents (to see how ASI CoC Material will be shipped once certified).</li> </ul>
9.2e Responsible employee	Conformance	<p>The Entity ensures that CoC Documents include the responsible employee who can verify information in the CoC Document. The following elements were already audited, in both Pacific and Atlantic Operations:</p> <ul style="list-style-type: none"> <li>Real Non-CoC Shipments' Expedition Documents without CoC claims (to see how they worked)</li> <li>Blank Specimen of ASI CoC Expedition Documents (to see how ASI CoC Material will be shipped once certified).</li> </ul>
9.2f Conformance statement	Conformance	<p>The statement confirming that "The information provided in the CoC Document is in conformance with the ASI CoC Standard" appears on RTA's CoC specimens. The</p>

CRITERION	RATING	COMMENT
		<p>following elements were already audited, in both Pacific and Atlantic Operations:</p> <ul style="list-style-type: none"> <li>• Real Non-CoC Shipments' Expedition Documents without CoC claims (to see how they worked)</li> <li>• Blank Specimen of ASI CoC Expedition Documents (to see how ASI CoC Material will be shipped once certified).</li> </ul>
9.2g Type of CoC Material	Conformance	<p>The type of CoC Material in the shipment is detailed in RTA's CoC specimen documents. The following elements were already audited, in both Pacific and Atlantic Operations:</p> <ul style="list-style-type: none"> <li>• Real Non-CoC Shipments' Expedition Documents without CoC claims (to see how they worked)</li> <li>• Blank Specimen of ASI CoC Expedition Documents (to see how ASI CoC Material will be shipped once certified).</li> </ul>
9.2h Mass of CoC Material	Conformance	<p>The mass of CoC Material in the shipment is detailed in RTA's CoC specimen Documents. The following elements were already audited, in both Pacific and Atlantic Operations:</p> <ul style="list-style-type: none"> <li>• Real Non-CoC Shipments' Expedition Documents without CoC claims (to see how they worked)</li> <li>• Blank Specimen of ASI CoC Expedition Documents (to see how ASI CoC Material will be shipped once certified).</li> </ul>
9.2i Mass of total material	Conformance	<p>The Entity ensures that CoC Documents include the mass of total material in the shipment. The mass of total material in the shipment is detailed in RTA's CoC specimen Documents. The following elements were already audited, in both Pacific and Atlantic Operations:</p> <ul style="list-style-type: none"> <li>• Real Non-CoC Shipments' Expedition Documents without CoC claims (to see how they worked)</li> <li>• Blank Specimen of ASI CoC Expedition Documents (to see how ASI CoC Material will be shipped once certified).</li> </ul>
9.3a Sustainability Data (optional)	Not Applicable	RTA will not include sustainability data in their CoC documents. This optional criterion does not apply.
9.3b Sustainability Data (passing on)	Not Applicable	This criterion is not applicable to the Entity's certification scope (no post-casthouse activity in the scope).

CRITERION	RATING	COMMENT
9.3c Post-Casthouse ASI Certification status	Not Applicable	This criterion is not applicable to the Entity's certification scope (no post-casthouse activity in the scope).
9.4 Supplementary Information (optional)	Not Applicable	RTA will not include supplementary information in their CoC documents. This optional criterion does not apply.
9.5 Response to verification requests	Conformance	The Entity's CoC process includes a possibility to respond to client's requests regarding the information present on the CoC documents.
9.6 Error management	Not Applicable	This criterion is not applicable for an initial certification. It will be systematically audited in the first upcoming surveillance audit.

#### 10 RECEIVING CoC DOCUMENTS

10.1 Verify required information included	Conformance	The Entity verifies that all required information in received CoC Documents have been included. The Entity's ASI procedure includes the verification of incoming CoC documents.
10.2 Verify consistency with shipments	Conformance	The Entity verifies the consistency of received CoC Documents with the accompanying CoC Material before recording information in their Material Accounting System. The Entity's ASI procedure includes the verification of incoming CoC documents.
10.3 Verify supplier CoC Certification status	Conformance	The Entity checks the ASI website on a regular basis 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. The Entity's ASI procedure includes the verification of ASI's website for ASI certification status of suppliers.
10.4 Error management	Conformance	If an error is discovered after CoC Material has been received, the Entity and the supplying party document the error and steps are taken to correct it and implement actions to avoid a recurrence. The Entity's ASI procedure includes the steps required in case of an error in CoC documentation.

#### 11 MARKET CREDITS SYSTEM: ASI CREDITS

CRITERION	RATING	COMMENT
11.1a Material Accounting System – allocation	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.1b Link to Casthouse Products	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.1c No double counting	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.1d No Positive Balance for ASI Credits	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.2a Date of issue	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.2b Reference number	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.2c Issuing Entity	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.2d Receiving Entity	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.2e Conformance statement	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.2f ASI Credits statement	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.2g Quantity	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.3b Material Accounting System – purchasing	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.

CRITERION	RATING	COMMENT
11.3c Expiry	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.3d No re-trading	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.3e No allocation to physical products	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.3f Verify supplier CoC Certification status	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This criterion is not applicable to the Entity's certification scope. The Entity has chosen not to use the market credit system.
<b>12 CLAIMS AND COMMUNICATIONS</b>		
12.1a ASI Claims Guide	Not Applicable	This criterion is not applicable for an initial certification. It will be systematically audited in the first upcoming surveillance audit.
12.1b Verifiable evidence	Conformance	The Entity has a declaration guide respecting ASI guidelines related to claims and declaration communications.
12.1c Employee training	Conformance	The Entity provides appropriate training related to claims and representation communications. The Entity has a declaration guide respecting ASI guidelines related to claims and declaration communications. Evidence presented indicate appropriate training of employees.

#### **Document Control and Version History**

Revision	Date	Notes
0	12 July 2018	Issued
1	20 September 2019	Updated to reflect Certification Scope change with addition of Kitimat Smelter (BC, Canada).
2	7 December 2019	Updated to reflect Certification Scope change with addition of Weipa Bauxite Mines and related port facilities and power stations (Weipa, Queensland, Australia), Yarwun Alumina Refinery (Yarwun, QLD, Australia), Bell Bay Aluminium Smelter (George Town, Tasmania, Australia), New Zealand Aluminium Smelter (Invercargill, New Zealand) and Headquarters (Brisbane, QLD, Australia)