
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

UC RUSAL

CERTIFICATE
NUMBER

34

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 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 black ink, appearing to be 'J. H.', written over a white background.

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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

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 PERFORMANCE 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

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Casthouse
- Semi-Fabrication

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Certification Audit

AUDIT FIRM DNV GL

AUDIT DATE 20 February – 28 March 2019

AUDIT REPORT SUBMISSION 21 May 2019

AUDIT SCOPE 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, semi-fabrication, Russia).

Supply chain activities included in the audit scope:

- 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

CERTIFICATE
NUMBER

34

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented and maintained systems to ensure awareness and compliance with the Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has established and maintains anti-Corruption policies and procedures in all its forms, including extortion and bribery.
1.3 Code of Conduct	Conformance	The organization has implemented a code of conduct that includes principles that meet the specified level of environmental, social and governance performance.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The organization has implemented and maintains up-to-date policies in accordance with the environmental, social and governance practices included in the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	For implementation obligations of policies, the senior management provides necessary resources and regularly reviews the policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Policies are available for the Entity's employees through an internal portal. Other stakeholders may obtain it on the Company's website.
2.2 Leadership	Conformance	Senior management representatives with overall responsibility and authority to ensure compliance with the requirements of the ASI Performance Standard are the heads of appropriate Entity's departments.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented the Environmental Management System.
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management Systems has been established and implemented.
2.4 Responsible Sourcing	Conformance	The organization has implemented a responsible sourcing Policy covering environmental, social and governance aspects, which is available on the Company's website.
2.5 Impact Assessments	Conformance	The Entity conducts environmental, social, cultural and human rights impact assessments,

CRITERION	RATING	COMMENT
		including a gender analysis, for new projects or major changes to existing facilities.
2.6 Emergency Response Plan	Minor Non-Conformance	The Entity has developed emergency response plans in accordance with Applicable Law. However, the stock of technical and material means necessary for the localization and liquidation of emergency situation at the pitch warehouse of one of the Entity's site did not fully match the list provided by written emergency plan.
2.7 Mergers and Acquisitions	Conformance	There were no mergers and acquisitions within the certification scope during the review period. The Entity has internal standards to review environmental, social and governance issues in the due diligence process for mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity reviews environmental, social and governance issues when planning closure, decommissioning and divestment objects.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Sustainability reports of RUSAL for 2016-2017 were qualified with the degree of the advanced compliance with the UN Global Compact requirements, and the Entity won "The Best" in ESG Award for its environmental, social and governance (ESG) practices described in the 2016 Sustainability report within the award competition among the HKEX (Hong Kong Exchanges and Clearing) listed companies: (https://sr.rusal.ru/upload/iblock/658/UC%20RUSAL%202017%20Sustainability%20report%20RUS.pdf).
3.2 Non-compliance and liabilities	Conformance	Where Applicable Law so requires or allows, information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law is publicly disclosed. Information about the non-monetary penalties imposed by the Russian state authorities is publicly available in accordance with the laws of the Russian Federation.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity makes, or has made on its behalf, payments to governments on a legal and contractual basis. All payments pass through several stages of verification in accordance with the procedures and standards of the Entity,

CRITERION	RATING	COMMENT
		including cashless payments to government authorities.
3.3b Payments to governments (disclosure – bauxite mining)	Conformance	The Entity discloses payments to the governments in the Company Annual report, which is available on the website: (https://rusal.ru/upload/iblock/327/LTN20180427141%20ar.pdf).
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented effective Complaints Resolution Mechanism for accounting of all stakeholder (external and internal) complaints, grievances and requests.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The “cradle-to-gate” assessment includes consideration of the production's life cycle from bauxite ore extraction to production of alloys, including the usage of the raw materials and other materials, energy use, air emissions, waste generation and other environmental aspects.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Upon customer request, the Entity provides adequate “cradle-to-gate” Life Cycle Assessment (LCA) information on its Aluminium (containing) product(s).
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity demonstrated existing public access to the LCA information and its underlying assumptions including system boundaries.
4.2 Product design	Conformance	The Entity integrates clear objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the end product.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity recycles 100% of aluminium scrap, including scrap of aluminium alloys, which was generated within own operations.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	All aluminium alloys and grades for recycling are stored separately, marked with tags indicating the weight and batch number.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has a recycling strategy with specific timelines, activities and targets. Considering the Entity's position in supply chain the Strategy includes target to recycle of 100% internally generated scrap as well as Entity's support in

CRITERION	RATING	COMMENT
		increasing recycling ratio of end-of life products containing aluminium via membership in national aluminium association.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is engaged with local, regional or national collection and recycling systems to support efforts to increase recycling rates in their respective markets for their products containing Aluminium where it's possible.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity annually keeps records and publicly discloses information about its GHG emissions in their Sustainability Report (https://sr.rusal.ru/upload/iblock/658/UC%20RU%20SAL%202017%20Sustainability%20report%20RUS.pdf) and annual reporting in the CDP (Carbon Disclosure Project) (https://www.cdp.net/en).
5.2 GHG emissions reductions	Conformance	The Entity sets strategic goals to reduce climate impact. The goals are communicated to the general public in annual reports that are available on the Company's website: (https://sr.rusal.ru/upload/iblock/658/UC%20RU%20SAL%202017%20Sustainability%20report%20RUS.pdf).
5.3a Aluminium Smelting (management system)	Conformance	The Entity has established a Management System, assessment procedures and operational control methods to limit Direct GHG emissions.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	In the certification scope, direct and indirect GHG emissions from the production of Aluminium (Scope 1 and Scope 2) are at level 2.4 tons of CO ₂ -eq / ton Al.
5.3c Aluminium Smelting (after 2020)	Not Applicable	There are no official approved plans to open aluminium smelter plants after 2020.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity quantifies emissions to atmosphere, taking into account national legal requirements and other commitments, if any. Information is disclosed in the Sustainability Report.
6.2 Discharges to Water	Conformance	The Entity quantifies discharges to water, taking into account national legal requirements and

CRITERION	RATING	COMMENT
		other commitments, if any. Information is disclosed in the Sustainability Report.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity conducts the major risk assessment for spills and leakage with possible contamination of air, water and/or soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has a management and external communication plans, compliance controls and a monitoring program in place to prevent and detect spills and leakages.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity implemented procedures for immediate notification affected parties about volume, type and potential impact of significant spills.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publicly discloses impact assessments of significant spills (if any occur) and remediation actions taken, and reports publicly on an annual basis in the Sustainability Report: (https://sr.rusal.ru/upload/iblock/658/UC%20RU%20SAL%202017%20Sustainability%20report%20RUS.pdf).
6.5a Waste management and reporting (strategy)	Conformance	The Entity implements a waste management strategy in accordance with the Environmental Policy, taking into account national legal requirements and other commitments, if any.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses, on an annual basis, the quantity of hazardous and non-hazardous waste generated by the Entity, and associated waste disposal methods in the Sustainability Report (https://sr.rusal.ru/upload/iblock/658/UC%20RU%20SAL%202017%20Sustainability%20report%20RUS.pdf).
6.6a Bauxite Residue (storage construction)	Conformance	Water circulation drainage systems are implemented and in full function at the bauxite residue storage facilities. Storage areas are constructed in a manner that effectively prevents the release of bauxite residue and leachate to the environment.
6.6b Bauxite Residue (integrity checks and controls)	Conformance	The efficiency and safety of bauxite residue storages during operation is ensured through maintenance, regular inspections and control checks, monitoring of the condition of facilities,

CRITERION	RATING	COMMENT
		including those with the involvement of specialized organizations.
6.6c Bauxite Residue (water discharge)	Conformance	At bauxite residue storages the water circulation drainage systems with zero discharge is implemented and functioning.
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	The Entity does not discharge bauxite residue to marine and aquatic environments.
6.6e Bauxite Residue (start of the art technologies)	Conformance	The Entity has established a program (roadmap) for the residue facilities prospective development for the bauxite residue storage taking into account the possibility of transition to the best available technologies.
6.6f Bauxite Residue (remediation)	Conformance	In case of the bauxite residue area closure the Entity monitors its condition and environmental impacts as well as rehabilitates disturbed areas in accordance with the Applicable Law.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity ensures the storage and management of Spent Pot Lining (SPL) is carried out in an environmentally friendly manner.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	Carbon from SPL is transferred to specialized licensed organization for recycling purposes.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	Carbon from SPL is transferred to specialized licensed organization for recycling purposes Refractory from SPL is landfilled at the Facility's own waste disposal site. Untreated SPL is not landfilled where there is a potential for adverse environmental effects.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	Carbon from SPL is transferred to specialized licensed organization for recycling purposes. Alternative options to landfilling of treated SPL and/or stockpiling of refractory SPL are reviewed annually while looking for potential consumers.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity does not discharge SPL into the marine or aquatic environment.
6.8a Dross (recovery)	Conformance	100% of dross is transferred to the third parties for usage / recycling.
6.8b Dross (recycling)	Conformance	100% of dross is transferred to the third parties for usage / recycling.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Conformance	No dross is sent to land fill (100% is transferred for recycling or re-use).
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has developed water balance, which defines its water withdrawal, usage and consumption by source and type.
7.1b Water assessment (risk assessment)	Conformance	<p>Water-related risks in watersheds in the Entity's Area of Influence are assessed in:</p> <ul style="list-style-type: none"> • the Entity's risk management system, • the Entity's environmental management system. <p>The Entity's risks are assessed taking into account two key factors, which characterize materiality of the risks:</p> <ol style="list-style-type: none"> 1. Likelihood of risk realization 2. Evaluation of potential loss as a result of the risk realization. <p>The Entity's risk assessment process also considers applied control measures when determining level of significance and materiality.</p> <p>Based on this approach there are no material Water-related risks in watersheds in the Entity's Area of Influence.</p>
7.2a Water management (management plans)	Not Applicable	<p>This criterion is Not Applicable because there were no material Water-related Risks in Watersheds in the Entity's Area of Influence (see 7.1b).</p> <p>Notwithstanding, the Entity has adequate systems and controls in place for water management. The risk management system considers all existing risk-related control measures when risks are evaluated. However, there are effective water related monitoring and control measures (actions) applied (implemented) within the Entity's environmental management system (water quality monitoring, waste water treatment, water consumption measurement, water bodies control etc.). The Entity also has defined a Plan of water consumption reduction, aligned with the Rusal Environmental Policy. All information is reported regularly to the Environmental Agency.</p>

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Not Applicable	<p>This criterion is Not Applicable because there were no material Water-related Risks in Watersheds in the Entity's Area of Influence (see 7.1b).</p> <p>However, the Entity monitors effectiveness of taken actions through regular water consumption measurements, water quality measurements, water bodies quality and levels control. The effectiveness of the water management plans is also monitored.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>As part of its annual sustainability reporting, the Entity discloses the information on water withdrawal and use: https://rusal.ru/upload/iblock/521/LTN201807271059.pdf).</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity's facilities assess risks and materiality of the impacts on biodiversity from the land use and activities in the Entity's area of influence. There are revealed no significant risks and impacts on biodiversity in the Entity's area of influence.</p>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	<p>There were revealed no significant risks and impacts on biodiversity in the Entity's Area of Influence.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	<p>There were revealed no significant risks and impacts on biodiversity in the Entity's Area of Influence.</p>
8.2c Biodiversity management (reporting)	Not Applicable	<p>There were revealed no significant risks and impacts on biodiversity in the Entity's Area of Influence.</p>
8.3 Alien Species	Conformance	<p>The Entity proactively prevents accidental or deliberate introduction of alien species that could have significant adverse impacts on biodiversity. Packing wood has been identified as the most likely way of introducing alien species. To prevent introduction, all packing wood is controlled and, when required, treated.</p>
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Conformance	<p>The Entity does not explore or develop new mines in World Heritage properties.</p>

CRITERION	RATING	COMMENT
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	The Entity does not carry out activities, including exploration work, in the locations of World Heritage sites.
8.5a Mine rehabilitation (best available techniques)	Conformance	Mine closure is not planned in the nearest future. As soon as the decision to close is made, the Entity will rehabilitate environments disturbed or occupied by mining activities, using best available techniques.
8.5b Mine rehabilitation (financial provisions)	Conformance	The Entity provides financial provisions to ensure availability of adequate resources to meet rehabilitation and mine closure requirements.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity implemented the policies that reflect commitments to respect human rights in accordance with the UN Guiding Principles on Business and Human Rights.
9.1b Human Rights Due Diligence (process)	Conformance	A Human Rights Due Diligence process provides addressing actual and potential impacts on the Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has implemented processes for remediation of adverse human rights impacts, if any.
9.2 Women’s Rights	Conformance	The Entity implemented an effective system of women rights observation.
9.3 Indigenous Peoples	Not Applicable	Analysed information supports that there are no indigenous peoples in the places of business and the zone of influence of the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Analysed information supports that there are no indigenous peoples in the places of business and the zone of influence of the Entity.
9.5 Cultural and sacred heritage	Not Applicable	Analysed information supports that there are cultural and sacred heritage sites in the places of business and the zone of influence of the Entity.
9.6a Resettlements (avoid or minimise)	Not Applicable	When making the project design the Entity takes into consideration the issues of resettlements in accordance with Applicable Law requirements. No relocations or resettlements are planned for the foreseeable future. There have been no

CRITERION	RATING	COMMENT
		resettlements for the Entity's Certification Scope, since it has become an ASI Member.
9.6b Resettlements (where unavoidable)	Not Applicable	When making the project design the Entity takes into consideration the issues of resettlements in accordance with Applicable Law requirements. No relocations or resettlements are planned for the foreseeable future. There have been no resettlements for the Entity's Certification Scope, since it has become an ASI Member.
9.7a Local Communities (rights and interests)	Conformance	No issues affecting local communities have been identified during the Human Rights Due Diligence along the criterion 9.1. The Entity's activities do not impact interests of local communities on their lands and livelihoods.
9.7b Local Communities (impacts)	Conformance	No issues affecting local communities have been identified during the Human Rights Due Diligence along the criterion 9.1. The Entity's activities do not impact interests of local communities on their lands and livelihoods. If actual or potential adverse impacts were to arise from the Entity's activities, the Entity has a process for addressing these adverse impacts on the local community livelihoods.
9.7c Local Communities (livelihoods)	Conformance	No issues affecting local communities have been identified during the Human Rights Due Diligence along the criterion 9.1. The Entity's activities do not impact interests of local communities on their lands and livelihoods. The Entity has a process for engaging with the local communities, explore opportunities to support local communities' livelihoods and interests even if there was no adverse impact identified.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity does not contribute to and does not promote armed conflict or human rights abuses in conflict-affected and high-risk areas, and does not allow and does not facilitate the production, supply and does not use a production of conflict minerals, the funds from the sale of which can be used to finance violence.
9.9 Security practice	Conformance	The Entity ensures respect for the human rights when involving with private or public security services.

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity provides the freedom of association and Right to collective bargaining.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Participation in collective bargaining process is conducted in good faith and with adherence to collective bargaining agreements.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity operates in Russia where Applicable Law does not restrict the right to the freedom of association and collective bargaining.
10.2a Child Labour (minimum age)	Conformance	Child labour isn't used or supported by the Entity.
10.2b Child Labour (hazardous)	Conformance	Child labour isn't used or supported by the Entity.
10.2c Child Labour (worst forms)	Conformance	Child labour isn't used or supported by the Entity.
10.3a Forced Labour (human trafficking)	Conformance	The Entity doesn't engage in or support human trafficking either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity doesn't require any form of deposit, recruitment fee or equipment advance from workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require migrant workers to lodge deposits or security payments.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold workers in debt bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not restrict the freedom of movement of workers in the workplace or in on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain original copies of workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Workers are free to terminate employment without penalty in accordance with the legislation requirements.
10.4 Non-Discrimination	Conformance	Any discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any worker on any grounds is

CRITERION	RATING	COMMENT
		prohibited by Labour Code of Russian Federation. The same requirements are implemented by internal procedures of the Entity.
10.5 Communication and engagement	Conformance	Communication and direct interaction with workers and their representatives ensure open communication and direct interaction with workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	No cases of corporal punishment use, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of workers were revealed.
10.7a Remuneration (living wage)	Conformance	Remuneration in the Entity is one of the highest across the industry of the Russian Federation, meets legal and industry standards, the basic needs of employees and provides some discretionary income.
10.7b Remuneration (method of payment)	Conformance	Wage payments are carried out timely, in legal tender and fully documented.
10.8 Working Time	Conformance	Working time (including Overtime working hours), public holidays and paid annual leave are in compliance with Applicable Law and industry standards.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The OH&S Policy is implemented, communicated, and regularly reviewed. RUSAL Global Management B.V. (Headquarter) has been certified along OHSAS 18001:2007.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OH&S Policy is applied to all workers and visitors. RUSAL Global Management B.V. (Headquarter) has been certified along OHSAS 18001:2007.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The acting revision of the Policy Statement includes a commitment to comply with all applicable laws and regulations of the countries in which the Entity operates as well as with accepted obligations in occupational safety. RUSAL Global Management B.V. (Headquarter) has been certified along OHSAS 18001:2007.

CRITERION	RATING	COMMENT
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The right of workers to know of the hazards and safe practices for their work, and the authority to refuse or stop unsafe work is included in the Policy. RUSAL Global Management B.V. (Headquarter) has been certified along OHSAS 18001:2007.
11.2 OH&S Management System	Conformance	The Entity has a documented Occupational Health and Safety Management System that is in conformance with applicable national and international standards. RUSAL Global Management B.V. (Headquarter) has been certified along OHSAS 18001:2007.
11.3 Employee engagement on health and safety	Conformance	Existing mechanism for engagement employees in the discussion and solving of health and safety issues includes joint health and safety committees.
11.4 OH&S performance	Minor Non-Conformance	The Entity has implemented lagging and leading indicators for evaluating its occupational health and safety performance, however in transport safety the indicators were not always sufficiently effective.

Document Control and Version History

Revision	Date	Notes
0	20 June 2019	Issued
1	7 November 2019	Update to comments in criteria 7.1b, 7.2a and 7.2b