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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# RIO TINTO ALUMINIUM (RTA) CANADA

CERTIFICATE  
NUMBER

1

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

BNQ

DATE OF ISSUE

16 MARCH 2018

DATE OF EXPIRY

15 MARCH 2021

CERTIFIED SINCE

16 MARCH 2018

AUTHORISED BY

A stylized, handwritten signature in black ink, likely representing the authorized representative of the Aluminium Stewardship Initiative.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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)*

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CERTIFICATION SCOPE

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

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Rio Tinto
ENTITY NAME	Rio Tinto Aluminium (RTA) Canada
CERTIFICATION SCOPE	<ul style="list-style-type: none"><li>• Vaudreuil Alumina Refinery (Saguenay QC, Canada)</li><li>• Alma Smelter (Alma QC, Canada)</li><li>• AP-60 Smelter (Saguenay QC, Canada)</li><li>• Arvida Smelter (Saguenay QC, Canada)</li><li>• Grande-Baie Smelter (Saguenay QC, Canada)</li><li>• Laterriere Smelter (Saguenay QC, Canada)</li><li>• Beauharnois (Beauharnois QC, Canada)</li><li>• Dubuc / PLS (Saguenay QC, Canada)</li><li>• Spent Pot Lining Treatment Plant (Saguenay QC, Canada)</li><li>• Quebec Power Operations (Saguenay QC, Canada)</li><li>• IPSF (Port and Rails) (Saguenay QC, Canada)</li><li>• Kitimat Smelter (Kitimat BC, Canada)</li><li>• Kemano Power Operations (Kitimat BC, Canada)</li><li>• Headquarters (Saguenay and Montreal QC, Canada)</li></ul>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Casthouses</li><li>• Semi-Fabrication</li><li>• Aluminium Re-melting / Refining</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Certification Audit (9-26 January 2018)</li><li>• Audit . Scope Change (4 September 2018 . 4 October 2018)</li><li>• Surveillance Audit (30 September 2019 . 28 February 2020)</li></ul>
AUDIT FIRM	BNQ
AUDIT DATE	<ul style="list-style-type: none"><li>• 9-26 January 2018 (Certification Audit)</li><li>• 4 September 2018 . 4 October 2018 (Audit . Scope Change)</li><li>• 30 September 2019 . 28 February 2020 (Surveillance Audit)</li></ul>

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AUDIT REPORT  
SUBMISSION

- 7 March 2018 (Certification Audit)
  - 26 November 2018 (Audit . Scope Change)
  - 21 August 2020 (Surveillance Audit)
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AUDIT SCOPE

Initial Certification Audit

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

All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.

Audit . Scope Change

- Headquarters (Saguenay and Montreal QC, Canada)
- Kemano Power Operations (Kitimat BC, Canada)
- Kitimat Smelter (Kitimat BC, Canada)

All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.

Surveillance Audit

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

All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.

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AUDIT  
OUTCOME

- Certification

AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.</li> <li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li> <li><input checked="" type="checkbox"/> The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.</li> <li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul>
CERTIFICATION PERIOD	16 March 2018 . 15 March 2021
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	15 March 2021
CERTIFICATION NUMBER	1

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented Processes that allow adequate awareness of legal requirements and to ensure Compliance with Applicable Laws and regulations. Based on interviews and evidence observed, this Criterion is met.</p> <p>To ensure Legal Compliance, the Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>Rio Tinto Management System (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Management-System-Standard.pdf?rev=54090c6a94644a92acd1ca0b9e170d">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Management-System-Standard.pdf?rev=54090c6a94644a92acd1ca0b9e170d</a>) and Performance Standards for Health, Safety, Environment and Communities (HSEC).</li> <li>Ethics &amp; Integrity Standards (<a href="https://www.riotinto.com/sustainability/ethics-integrity">https://www.riotinto.com/sustainability/ethics-integrity</a>).</li> <li>Company Code of Conduct (The Way We Work - <a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-The-way-we-work-EN.pdf?rev=ccfe41c89a9341ba833ad483dda0ef8a">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-The-way-we-work-EN.pdf?rev=ccfe41c89a9341ba833ad483dda0ef8a</a>).</li> <li>Legal Register, Legal watch and regulatory Compliance checks in HSE for the operations.</li> <li>ISO 14001 Certification for smelters, refinery and power operations and ISO 9001 in the casting centers.</li> <li>Tax Service for tax requirements.</li> <li>Human Resources Service and Labour Law.</li> <li>Legal Service for any other law / regulation.</li> </ul>
1.2 Anti-Corruption	Conformance	<p>The Entity has established adequate Anti-Corruption measures which are approved by the highest management level and implemented at all relevant corporate levels. Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Anti-Corruption Policies (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-The-way-we-work-EN.pdf?rev=ccfe41c89a9341ba833ad483dda0ef8a">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-The-way-we-work-EN.pdf?rev=ccfe41c89a9341ba833ad483dda0ef8a</a>) and Systems officially approved by the highest level of the company are available. These provide an awareness of the problems and risks of Corruption, and provide the basis for integrating an Anti-Corruption culture into the organization.</li> <li>These Policies are communicated appropriately to all employees and Stakeholders. The penalties that apply in case of non-Compliance are mentioned.</li> <li>Ethics and Integrity Group (<a href="https://www.riotinto.com/sustainability/ethics-integrity">https://www.riotinto.com/sustainability/ethics-integrity</a>) is the primary contact for providing advice and receiving complaints or concerns regarding Compliance with Anti-Corruption Policies. A reporting and whistleblowing mechanism is available for all employees and Contractors (<a href="https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad">https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad</a>).</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>Periodic training on Anti-Corruption is mandatory for employees.</li> <li>Policies and Procedures appropriately address donations, charitable contributions and sponsorships.</li> <li>Criteria and documented Procedures are available for registration and approval of the offer and acceptance of third-party gifts, including hospitality and entertainment. A register is established to record them.</li> <li>The risk assessment to identify the parts of the company that are exposed to the risk of Corruption is made on a case-by-case basis are reviewed regularly.</li> </ul> <p>In conclusion, a documented and mature program is established to mitigate the risks of Anti-Corruption, including providing training, formal approval Procedures and increased monitoring of reported situations.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a written organizational Code of Conduct that includes relevant Principles for environmental, social and governance performance. Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Existence of an Organizational Code of Conduct - The Way We Work (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-The-way-we-work-EN.pdf?rev=ccfe41c89a9341ba833ad483dda0ef8a">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-The-way-we-work-EN.pdf?rev=ccfe41c89a9341ba833ad483dda0ef8a</a>) in which commitments regarding: <ol style="list-style-type: none"> <li>Business integrity, including the areas of environmental, social and governance performance covered by ASI.</li> <li>The inclusion of a commitment to respect the rights of Indigenous Peoples.</li> </ol> </li> <li>Employees and interested parties (including subcontractors) are made aware of the Code of Conduct. A demonstration of the Principles of the Code of Conduct are integrated into the Business Activities.</li> <li>Awareness sessions are planned and implemented to inform employees and company partners, service providers and suppliers about the Principles and values of the organization.</li> <li>Ethics and Integrity Group (<a href="https://www.riotinto.com/sustainability/ethics-integrity">https://www.riotinto.com/sustainability/ethics-integrity</a>) is the primary contact for providing advice and receiving complaints or concerns regarding the Code of Conduct. A reporting and denunciation mechanism is available for all (<a href="https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad">https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad</a>).</li> </ul>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has Policies that include statements of Principles and intention which support achievement of the requirements in the ASI Standard. A set of environmental, social and governance Policies (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-HSEC-Policy.pdf?rev=433bf114f20d403f83c995502503b1cb">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-HSEC-Policy.pdf?rev=433bf114f20d403f83c995502503b1cb</a>),</p>

CRITERION	RATING	COMMENT
		<p>comply with the ASI Performance Standard. Evidence of implementation is available.</p> <p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• Policies include statements of Principles and intention which support achievement of the requirements in the ASI Standard.</li> <li>• Policies are relevant to activities and their potential impacts.</li> </ul>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>Senior management endorses, support through provision of resources and regularly review the Policies (<a href="https://www.riotinto.com/sustainability/Policies#Policy-results_e=50">https://www.riotinto.com/sustainability/Policies#Policy-results_e=50</a>). Senior management has demonstrated its commitment to the implementation of the Policies. Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• Business Activities are in accordance with the Policies.</li> <li>• Environmental, social and governance Policies are updated regularly.</li> <li>• Policies commitments are incorporated into operational Policies and appropriate Procedures.</li> <li>• Ethics and Integrity Group (<a href="https://www.riotinto.com/sustainability/ethics-integrity">https://www.riotinto.com/sustainability/ethics-integrity</a>) is the primary contact for providing advice and receiving complaints or concerns regarding Compliance with Policies. A reporting and denunciation mechanism is available for all employees and Contractors and actions are planned when required (<a href="https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad">https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad</a>).</li> <li>• Problems and progress monitoring is done by senior management.</li> </ul>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• Policies are communicated internally to all Workers (awareness - intranet - website - posting, etc.).</li> <li>• Senior management ensures that staff are aware of the social and governance Policies relevant to the specific responsibilities and tasks they perform.</li> <li>• Employees are aware of Policies that are directly related to their position.</li> <li>• Awareness and reinforcement help employees and management to integrate Policies into their work and Procedures.</li> <li>• Policies (<a href="https://www.riotinto.com/sustainability/Policies#Policy-results_e=50">https://www.riotinto.com/sustainability/Policies#Policy-results_e=50</a>) are available to external Stakeholders to raise awareness of the company's commitments (website - posting - etc.).</li> </ul>
2.2 Leadership	Conformance	<p>Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following elements:</p> <ul style="list-style-type: none"> <li>• The Executive Director - Operation - Atlantic, has renewed the General Manager (GM) Energy and Climate Change - Atlantic, as ASI Manager for the Canadian Facilities which together constitute the Entity.</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>The GM Energy and Climate Change - Atlantic sits on the RTA ASI Steering Committee and is in Control of the ASI Program for the Atlantic Operations.</li> <li>The Principal Advisor, ASI &amp; Climate Change - Atlantic, operationalises ASI for the Entity and help orientate the operations through the ASI way.</li> </ul>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>All Canadian Facilities targeted by the ASI-PS Certification are already Certified to ISO 14001:2015 by the BNQ and ASI recognizes ISO 14001:2015 as responding to article 2.3a. Please see the following link to view the valid ISO 14001:2015 Certificate of the Entity: (<a href="https://www.bnq.qc.ca/en/Certified-clients.html?nomentreprise=&amp;noCertificat=50650-1-06">https://www.bnq.qc.ca/en/Certified-clients.html?nomentreprise=&amp;noCertificat=50650-1-06</a>).</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Internet Portal provides information related to this Criterion. The Health, Safety (<a href="https://www.riotinto.com/sustainability/health-safety-wellbeing">https://www.riotinto.com/sustainability/health-safety-wellbeing</a>), Environment (<a href="https://www.riotinto.com/sustainability/environment">https://www.riotinto.com/sustainability/environment</a>) and Communities (<a href="https://www.riotinto.com/sustainability/Communities">https://www.riotinto.com/sustainability/Communities</a>) (HSEC) Standards are implemented and meets these requirements. The Rio Tinto Management System (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Management-System-Standard.pdf?rev=54090c6a94644a92acd1ca0b9e170d">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Management-System-Standard.pdf?rev=54090c6a94644a92acd1ca0b9e170d</a>) includes a Community component in its Health, Safety, Environment and Community (HSEC) Standards as well as a "Community and Social Performance" (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Communities-social-performance-Standard.pdf?rev=d8e61c125b5748c88173b4272d6c1009">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Communities-social-performance-Standard.pdf?rev=d8e61c125b5748c88173b4272d6c1009</a>) Standard which is, among other things, based on the international Standard of the International Finance Corporation (IFC) Performance Standard ( PS) 4: Community Health, Safety, and Security. IFC is a sister organization of the World Bank and is a member of the World Bank Group.</p> <p>Social risks are managed using the specialised 5x5-matrix derived from Rio Tinto Risk Management Standards (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Risk-management-Standard.pdf?rev=0b5adb7ae0194852bcd55481e992f2fc">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Risk-management-Standard.pdf?rev=0b5adb7ae0194852bcd55481e992f2fc</a>). Locally, Facilities maintain Good Neighbor Committees where they interact, inform and consult with the Community. Public Consultation on the proposed "Vaudreuil - Beyond 2022" bauxite tailings project expands on the deployment of social management Processes and social risks management.</p> <p>For the Occupational Health and Safety (OH&amp;S) parts, see the evidence presented in Chapter 11 of this Document.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented a Supplier Code of Conduct (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Supplier-code-of-conduct-EN.pdf?rev=379f94a542884756b5ebd1133fb68f31">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Supplier-code-of-conduct-EN.pdf?rev=379f94a542884756b5ebd1133fb68f31</a>) that meets the</p>



CRITERION	RATING	COMMENT
		<p>Criteria. The interviews and evidence reviewed demonstrated that, at the international level, Rio Tinto deploys several Processes to ensure Responsible Sourcing:</p> <ul style="list-style-type: none"> <li>• The Procurement Group Standard.</li> <li>• The Procurement Group Website (<a href="https://www.riotinto.com/footer/suppliers/working-with-us">https://www.riotinto.com/footer/suppliers/working-with-us</a>) allows access to the responsible procurement tools, for example the following: <ul style="list-style-type: none"> <li>• The Code of Ethics "The Way We Work"</li> <li>• Rio Tinto's Global Supplier Code of Conduct</li> <li>• Business Integrity Standard</li> <li>• Human Rights Policy</li> </ul> </li> </ul> <p>Locally, Contractors working in Rio Tinto's Facilities or providing Rio Tinto are regularly monitored and communicated through the deployment of the Contractor Management System. The Contractor Management Team is dedicated to deploying the Contractor Management System.</p>
2.5 Impact Assessments	Conformance	<p>Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following elements:</p> <ul style="list-style-type: none"> <li>• a Risk Management Standard (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Risk-management-Standard.pdf?rev=0b5adb7ae0194852bcd55481e992f2fc">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Risk-management-Standard.pdf?rev=0b5adb7ae0194852bcd55481e992f2fc</a>),</li> <li>• a Risk management Policy (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Risk-Policy.pdf?rev=448437a825ba45e6afa27d66f32f8e69">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Risk-Policy.pdf?rev=448437a825ba45e6afa27d66f32f8e69</a>),</li> <li>• an Inclusion &amp; Diversity Policy (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Inclusion-and-diversity-Policy.pdf?rev=d4ab50759cb543d1b7a97f31f02102e4">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Inclusion-and-diversity-Policy.pdf?rev=d4ab50759cb543d1b7a97f31f02102e4</a>),</li> <li>• the "Why Human Rights matter" Guide (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Why-human-rights-matter-EN.pdf?rev=ff7b1377899441a9b4deadaaac6a48f3">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Why-human-rights-matter-EN.pdf?rev=ff7b1377899441a9b4deadaaac6a48f3</a>),</li> <li>• the "Why Agreements matter" Guide (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Why-Agreements-matter.pdf?rev=260e7043b750470382c6e7a90167434b">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Why-Agreements-matter.pdf?rev=260e7043b750470382c6e7a90167434b</a>),</li> <li>• the Employment Policy (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Employment-Policy.pdf?rev=37a7cd5c0e84433f8972e2837bd863b6">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Employment-Policy.pdf?rev=37a7cd5c0e84433f8972e2837bd863b6</a>),</li> <li>• the Communities and Social Performance Standard (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Communities-social-performance-Standard.pdf?rev=d8e61c125b5748c88173b4272d6c1009">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Communities-social-performance-Standard.pdf?rev=d8e61c125b5748c88173b4272d6c1009</a>),</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>Rio Tinto's major projects are audited by a dedicated corporate RT team in this area.</li> </ul> <p>Quebec's and British-Colombia (BC) laws and regulations for Impact Assessment are strict, and this Audit, together with RTA's ISO 14001 Certification in Canada, makes it possible to verify their deployment. In Canada, laws also protect Human Rights and gender equality.</p> <p>Two major projects were audited to the BNQ's satisfaction:</p> <ul style="list-style-type: none"> <li>the expansion of the Vaudreuil plant's Bauxite Residue disposal site (the VB 2022 Project).</li> <li>the management of the Lac-Saint-Jean riverbanks (related to RTA hydroelectric Facilities).</li> </ul> <p>First Nations and Communities impacted by the Lac-Saint-Jean project participated actively in the Authorisation renewal Consultation. First Nations affected by the BC Works projects participated actively in the authorization Consultation. All audited projects have been analysed with environmental, social, cultural and Human Rights risk impacts and has identified mitigation measures accordingly.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity is currently Certified to ISO 14001:2015. The Business Resilience and Recovery Plan (BRRP) is the main Document covering emergency responses, contingencies and business continuity. Section 2 of Business Resilience Management Plan (BRMP) deals with Emergency Responses and defines the emergency scenarios, response plan, equipment, communication, responsibilities and specific Procedures.</p> <p>A calendar for drill and training is in place to track and Document the exercises.</p> <p>Drills are performed and debriefing from drills and real events helps improve the effectiveness of the BRRP for the Entity and for RT.</p>
2.7 Mergers and Acquisitions	Conformance	<p>Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>A Merger and Acquisition Process is deployed by RTA (Project evaluation Standard).</li> <li>There is a Merger and Acquisition department in the corporate offices.</li> <li>Any major merger and acquisition project is subject to a social, environmental and governance Due Diligence Process.</li> </ul> <p>Corporate Processes are in place if ever there is mergers and acquisitions projects.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>The Closure approach (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Closure-approach.pdf?rev=bc321129cbc74e78903e604c387a74b7">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Closure-approach.pdf?rev=bc321129cbc74e78903e604c387a74b7</a>).</li> <li>The HSEC site Closure Standards deployed by the Closure Group.</li> <li>The Closure Guidance Note.</li> <li>The Closure Working Group Charter.</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>The Rio Tinto Closure Steering Committee (CSC) Terms of Reference.</li> <li>The Closure Steering Committee Dashboard.</li> </ul> <p>In the province of Quebec, the management Process for the environmental, social and governance issues related to site Closure was verified through the Closure program of the Shawinigan Aluminum Smelter. The following Processes have been audited by the BNQ:</p> <ul style="list-style-type: none"> <li>Feasibility study (social, environmental, economic, feasibility, etc.).</li> <li>The deployment of the project for the Closure, demolition, environmental rehabilitation and social compensation.</li> <li>The site decontamination notice.</li> <li>Deployment of a psychological support program for the concerned employees.</li> </ul> <p>In the province of British Columbia, BC Works put in place a complete Closure, Decommissioning and Divestment Process. Furthermore, all Decommissioning plans must be approved by the provincial authorities. Projects are managed by a dedicated Project Team that Report evolution of works to the management team during periodic meetings.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>Globally, Rio Tinto publishes annually a global sustainable development Report (<a href="https://www.riotinto.com/sustainability/sustainability-reporting">https://www.riotinto.com/sustainability/sustainability-reporting</a>).</p> <p>The Entity publicly disclosed a satisfactory sustainable development Report for the provinces of Quebec (<a href="https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/">https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/</a>), where it mainly operates (content available only in French) and was sent to all employees.</p> <p>British-Colombia (BC) Works has published annual Sustainability Report (<a href="https://www.riotinto.com/canada/bc-works-4818.aspx">https://www.riotinto.com/canada/bc-works-4818.aspx</a>) and was sent to all employees.</p> <p>In addition, BC Works also produces an Annual Environmental Report since 2008 to share environmental performance with the Stakeholders. The Report is submitted to the provincial government and made available to the public through the RT website (<a href="https://www.riotinto.com/canada/bc-works-4818.aspx">https://www.riotinto.com/canada/bc-works-4818.aspx</a>) and the Kitimat Public Advisory Committee (KPAC).</p>
3.2 Non-Compliance and liabilities	Conformance	<p>Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>Non-Compliances and liabilities are published in the Entity's Sustainability Reports.</li> </ul> <p>For the provinces of Quebec, please see the following link (<a href="https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/">https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/</a> - see pages 10 and 11, the content is available only in French).</p> <p>For British-Colombia (BC) Works through this link (<a href="https://www.riotinto.com/canada/bc-works-4818.aspx">https://www.riotinto.com/canada/bc-works-4818.aspx</a>):</p> <ul style="list-style-type: none"> <li>Non-Compliances and liabilities are published in the BC Works 2018 Sustainability Report. For example, the environmental Non-Compliances identified during the Compliance Audit are mentioned in the Report.</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>The BC Works 2018 Annual Environmental Report details all the non-Compliance issued in 2018, with the Corrective Actions.</li> </ul>
3.3a Payments to governments (legal and contractual)	Conformance	<p>This requirement is covered, through Transparency Statement (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Transparency-statement.pdf?rev=55ee4233d11549a38436de9f0db78900">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Transparency-statement.pdf?rev=55ee4233d11549a38436de9f0db78900</a>) and Business Integrity Standard (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Business-integrity-Standard-EN.pdf?rev=80b9f43890f84e2e89acb91bbf2f0339">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Business-integrity-Standard-EN.pdf?rev=80b9f43890f84e2e89acb91bbf2f0339</a>) deployment. Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>Quebec's and BC laws and regulations for taxes, permit and other official authorisations are strict and prescriptive.</li> <li>Payments to governments are independently verified by independent accounting firms.</li> <li>The federal (Canada) and provincial governments carry out certain Audits directly.</li> <li>Rio Tinto has a Tax Department strictly supervised by continuous training and by the following Processes: <ul style="list-style-type: none"> <li>The RT Business Integrity Standard and transparency statement.</li> <li>The Code of Conduct (The Way We Work).</li> <li>The Rio Tinto Tax Manual.</li> </ul> </li> </ul>
3.3b Payments to governments (disclosure . Bauxite Mining)	Not Applicable	This Criterion is Not Applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <p>For the province of Québec:</p> <ul style="list-style-type: none"> <li>For First Nations requests, see Chapter 9 of this Report.</li> <li>Each major Facility deploys a Good Neighborhood Committee to interact with relevant Stakeholders.</li> <li>Rio Tinto Regional Security Department allows to receive any complaints or relevant request.</li> <li>Different websites provide information to relevant Stakeholders.</li> <li>RTA Electric Power deploys a georeferenced System for monitoring complaints or requests from Stakeholders on the shores of Lake St-Jean which is a hydroelectric reservoir for Rio Tinto.</li> <li>The Rio Tinto Business Solution (RTBS) enables the tracking of all relevant requests or complaints from Stakeholders.</li> <li>Efficient Process to address and close complaints, with KPI follow-up.</li> <li>Rio Tinto's ISO 14001 Certification enables the BNQ to track the handling of environmental complaints and the management</li> </ul>

CRITERION	RATING	COMMENT
		<p>of the Lac-Saint-Jean riverbanks (related to RTA hydroelectric Facilities).</p> <ul style="list-style-type: none"> <li>First Nations affected by the Lac-Saint-Jean project participated actively in the Authorisation renewal Consultation.</li> </ul> <p>For the province of BC:</p> <ul style="list-style-type: none"> <li>BC Works received complaints or requests through e-mails, phone calls, Facebook.</li> <li>Complaints are usually addressed right away and all actions have been closed.</li> <li>A new System has been launched in August 2018, replacing the excel file, to track all complaints and actions follow-up. This System is also used to record requests of information.</li> <li>Analytics are included in this System, which are shared with Stakeholders and Kitimat Public Advisory Committee (KPAC).</li> <li>KPAC and the Community Office advise regularly about the means for the Communities to provide questions, comments or concerns to BC Works.</li> <li>Training has been provided in 2018 to all communication team members about the differences regarding incidents, complaints, disputes and grievances and how to deal with them.</li> <li>The Water Engagement Initiative (WEI) provides a formal forum for every concerned Stakeholders of the Nechako Watershed/Reservoir (Kemano Power Operations) to communicate and monitor complaints, grievances and requests for information.</li> </ul>

#### PRINCIPLE 4 MATERIAL STEWARDSHIP

4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity evaluates life cycle impacts of its major Product line. Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>An environmental Life Cycle Assessment (LCA) of aluminum ingot produced by Rio Tinto Alcan was conducted in 2014 (study done by an internationally renowned firm in LCA) "Screening Life Cycle Assessment of Pechiney Aluminum technologies".</li> </ul>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity's cradle-to-gate LCA data are available upon request. Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>An interactive Excel matrix presenting RTA lifecycle was provided to the BNQ. RTA provide Carbon Footprint data to the Canadian Aluminum Association (AAC) and collaborates with the Intergovernmental Panel on Climate Change (IPCC) and the International Aluminium Institute (IAI) about it.</li> </ul>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity's LCA data are available upon request. Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>The carbon footprint analysis of the North American and European ingot has been made and is available upon request: Carbon footprint of Rio Tinto Alcan ingot aluminum - North America and Europe, 2013. The summary has been provided</li> </ul>

CRITERION	RATING	COMMENT
		upon request to the BNQ and presents the System's boundaries, data sources and corresponding assumptions.
4.2 Product design	Conformance	<p>Documentation related to Product design includes resource efficiency, optimization of utilization phase, recyclability and life cycle impacts of the end Product. This Criterion is particularly applicable for Product design and development activities at RT Dubuc Works, which is involved in the definition of design objectives and specifications in collaboration with its customers. All other business units are not covered by this Criterion as they are involved in the manufacture of standardized semi-finished Products that do not necessarily have a design and development Process but are inputs for more specialized manufacturing for their customers (e.g. aluminum cans, etc.).</p> <p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• Systems documentation related to Product design includes objectives covering resource efficiency, optimization of utilization phase, recyclability, scrap tolerance and life cycle impacts of the end Product.</li> <li>• Objectives to reduce the environmental impacts of Products at the beginning of the development Process are developed.</li> <li>• The main design parameters that may affect the environmental footprint of the Product are developed, such as alloys, weight, percentage of expected processing Waste and recyclability.</li> <li>• The requirements of element 8.3 of ISO 9001: 2015 described in a design and development Process, are implemented and were clearly demonstrated during the Audit conducted by the BNQ.</li> <li>• Scrap aluminum Products are 100% recyclable (aluminum, spot, Dross, etc.).</li> </ul>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has developed and implemented Policies, Systems, Procedures and Processes that conform to these Material stewardship requirements. Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• Planning and implementation of optimised aluminum residues reuse is performed, followed and integrated centrally for all RTA-Atlantic production sites at the Aluminum Operations Centre.</li> <li>• Minimum (safety stock) and maximum aluminum residues inventory targets for each production site are set, monitored, and reviewed periodically based on the established metallurgist requirement and reuse capacity requirements.</li> <li>• The Casthouses are ISO 9001:2015 Certified.</li> <li>• The RTA Control Tower helps optimize scrap recycling for the overall Entities in Canada.</li> </ul>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has an aluminum recycling strategy. Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• All aluminum alloys scrap are separated and recycled by family and grade based on the production needs planned by the metallurgists at each production site.</li> </ul>



CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>The RTA Control Tower helps optimize scrap recycling for the overall Entity in Canada.</li> </ul>
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	<p>The Entity has an aluminum recycling strategy. The Criterion does not directly apply to the Entity Products:</p> <ul style="list-style-type: none"> <li>All primary aluminum is internally recycled when not transferred to the next transformation step.</li> <li>All aluminum sold by the remelting /Refining or Semi-Fabrication Facilities is Pre-Consumer Scrap and is 100% recyclable in these Facilities.</li> <li>The Entity does not sell aluminum Products for end uses but to Material Conversion or Other manufacturing Facilities that produce end use Products.</li> <li>Even if the end-use Products are not coming from the Entity, the Entity is involved in recycling activities at the local, regional and national levels.</li> </ul>
4.4b Collection and recycling of Products at end-of-life (engagement)	Conformance	<p>The Entity has an aluminum recycling strategy. Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>RTA presented examples of achievement to promote the recycling of aluminum in Communities, made by the Aluminium Association of Canada (AAC). It is the AAC that is mandated by RTA (and the other aluminum producers in Quebec) to carry out this type of mission and activity, which does not directly concern RTA's operations.</li> </ul> <p>Here are some initiatives that have been done by the AAC on the subject:</p> <ul style="list-style-type: none"> <li>Co-founder of the Quebec Pole in Circular Economy - works with the Sustainability, Environment and Circular Economy Institute (EDDEC).</li> <li>Founding members of a group called "Pro-Consigne" working to develop mechanisms to promote the recovery of cans and ensure the sustainability of this recovery route to the provincial elected officials.</li> <li>Conducting a study in partnership with the Association des Brasseurs du Québec to evaluate the critical mass of equipment and the potential to implement can recycling operations in Quebec.</li> <li>Members of the residual Materials management committee of the Provincial Minister of Environment.</li> <li>Participation in the gathering Table of recovery out of home which aims among others the recovery of containers in the public spaces.</li> </ul>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>Globally, Rio Tinto publishes annually a global sustainable development Report (<a href="https://www.riotinto.com/sustainability/sustainability-reporting">https://www.riotinto.com/sustainability/sustainability-reporting</a>).</p> <p>Province of Québec: The consolidated greenhouse gas (GHG) Material emissions by source for alumina and aluminium production as well as the energy intensity consumed by aluminum smelters and their sources have been disclosed publicly in the 2018 Provincial Sustainability Report</p>

CRITERION	RATING	COMMENT
		<p>through the monthly «Le Lingot» of September 2019 at the following link (<a href="https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/">https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/</a> - content available only in French):</p> <p>This publication helps close the Minor Non-Conformity raised in 2018 in the First Original Certification Report (ASI-PS Audit Report 1122, ASI-PS original Certificate No. 1).</p> <p>Province of BC: BC Works accounts for and publicly discloses Material Greenhouse Gas (GHG) emissions and energy use by source on an annual basis through the 2018 BC Work Environmental Performance Report (<a href="https://www.riotinto.com/canada/bc-works-4818.aspx">https://www.riotinto.com/canada/bc-works-4818.aspx</a>).</p>
5.2 GHG emissions reductions	Minor Non-Conformance	<p>Globally, Rio Tinto publishes annually a global sustainable development Report (<a href="https://www.riotinto.com/sustainability/sustainability-reporting">https://www.riotinto.com/sustainability/sustainability-reporting</a>).</p> <p>Province of Québec: The Entity did publish its consolidated time-bound GHG emissions reduction targets (in absolute) for the Province of Québec (Canada) in the 2018 Provincial Sustainability Report through the monthly «Le Lingot» of September 2019 at the following link (<a href="https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/">https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/</a> - content available only in French).</p> <p>The plan and the Management System to reduce the GHG emission are described in section 5.3 of this Report (below). This objective is also indirectly known at provincial Scale for all Aluminium smelters (in intensity) from the Quebec Cap-and-trade-System for emission allowances.</p> <p>This publication helps close the Minor Non-Conformity B 2018 raised in the First Original Certification Report (ASI-PS Audit Report 1122, ASI-PS original Certificate No. 1).</p> <p>Province of BC (the NC remains open): MIN NC D 2018 RTA CAN . Criterion 5.2 . GHG emissions reductions: The implementation of the Kitimat Modernization Project (KMP) helped build a state-of-the-art smelter that reduced GHG emissions by more than 36%. That 36% or 898,800 t CO<sub>2</sub> eq. target was published in 2013 as Post-KMP targets that was met and even surpassed in 2017 (after a completed ramp-up). In 2018, there is no evidence available to demonstrate that the Kitimat Smelter published its time-bound post ramp-up GHG emissions reduction targets for the upcoming years.</p>
5.3a Aluminium Smelting (Management System)	Conformance	<p>The Entity's Direct GHG Emissions are annually verified under the Quebec Carbon Trade and British Columbia regulations. GHG Emissions are lower than 8 tonnes of CO<sub>2</sub> eq. Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>• Process controls are continuously optimized to reduce the frequency and duration of anode effects, which is a direct and Material source of GHG from aluminium smelters.</li> <li>• Process controls to reduce net carbon consumption (anodes and cathodes) are optimized continuously.</li> </ul>



CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>Direct GHG Emissions are annually verified under the Quebec Carbon Trade and British Columbia regulations by an ISO 14065 accredited verification body.</li> <li>Verification Reports on the 2018 direct emissions of aluminum smelters were obtained and reviewed to the satisfaction of the BNQ.</li> </ul>
5.3b Aluminium Smelting (up to and including 2020)	Conformance	<p>The Entity's Direct GHG Emissions are annually verified under the Quebec Carbon Trade and British Columbia regulations. Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following Processes:</p> <ul style="list-style-type: none"> <li>Scope 1 and Scope 2 GHG Emissions from the Entity aluminium smelters are below 8 t of GHGs per t Al.</li> <li>External Audits Reports make it possible to do this demonstration.</li> <li>Quebec and BC Work uses Hydroelectricity which are very sober in Carbon.</li> </ul>
5.3c Aluminium Smelting (after 2020)	Conformance	<p>This Criterion was not relevant at the time of the Audit, as there are no new Facilities to commence operation after 2020.</p>

#### PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE

6.1 Emissions to Air	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>RTA holds 5 provincial environmental permits which detail the air emissions of all smelters.</li> <li>Each site maintains a daily/monthly database, to measure and Report air emissions.</li> <li>This is supported by an exhaustive and regulatory monitoring program.</li> <li>Monthly performance is reported to the Québec Ministry of Environment for the Depollution Attestations purposes.</li> <li>A 2017-2018 Improvement Plan was on-going to reduce air emissions, mostly particulates, at different sites.</li> <li>A summary of air emissions is included in the Annual Report on Sustainable Development.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>RTA Kitimat-Kemano plants produce many air emissions reporting through the Provincial Pollution Prevention Multimedia Environmental Permit (P2 Permit) that allows them to operate.</li> <li>Reporting is mandatory to keep this right to operate. All reporting on air emissions are based on the Permit.</li> <li>All official air emission surveys are performed by an external specialized firm.</li> <li>Lots of energy is spent to improve stats that are already better than targeted by the authorities.</li> <li>All air emission is publicly disclosed in the Annual Report.</li> <li>A specific environment effect monitoring (EEM) Plan has been implemented to monitor Material air emissions. The results are regularly reported to environmental authorities and in BC Works' Annual Environmental Report.</li> </ul>
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CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>Most air emissions have decreased with the implementation and ramp-up of the new Kitimat Smelter except for Sulfur Dioxide (SO<sub>2</sub>). A specific and exhaustive SO<sub>2</sub> environmental monitoring plan is implemented and the monitoring results are reported, amongst others.</li> </ul>
6.2 Discharges to Water	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>The Entity is ISO 14001 Certified and carries out EHS legal / regulatory Compliance monitoring for this Criterion.</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>Discharges to Water are defined through the Depollution Attestation (concentration limits, sampling frequency, methodology, etc.).</li> <li>Daily, weekly and monthly effluent samples provide a very complete and efficient monitoring program. The results are communicated monthly to the government.</li> <li>Several projects and action plans are on track to reduce effluents or contamination at Arvida smelter, Vaudreuil refinery, SPL treatment plant (UTB) and Port and Rail Facilities (IPSF).</li> <li>The Annual Report on Sustainable Development includes a section on the water consumption by smelters and Reports total particulate matters.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>RTA Kitimat-Kemano plants produce many water discharge reporting through the Provincial "P2 Permit" that allows them to operate.</li> <li>Reporting is mandatory to keep this right to operate. All reporting on water discharge are based on the Permit.</li> <li>There is only one effluent discharge to the ocean where water of all plant Watershed is concentrated in a final contained lagoon where water is treated depending on monitoring results before final discharge to the ocean.</li> <li>By the Permit, BC Works produces and transmits to the Authorities monthly reporting on discharged water parameters measurements.</li> </ul>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>The Entity has an exhaustive spill and leakage action plan in place.</p> <ul style="list-style-type: none"> <li>Scenarios of spills have been assessed and evaluated throughout the sites.</li> <li>This was done with the RT specialised "5x5" risk matrix.</li> <li>An exhaustive action plan and Corrective Actions have been put in place.</li> <li>Training and awareness on spill prevention have been integrated in training Materials for all employees and Contractors.</li> </ul>
6.3b Assessment and Management of	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>The Entity has an exhaustive spill and leakage action plan in place.</p>

CRITERION	RATING	COMMENT
Spills and Leakage (management)		<p>Province of Québec and BC:</p> <ul style="list-style-type: none"> <li>• Communication plan and Procedures are in place to manage spill, from site level to the regional level.</li> <li>• For significant spills, the information is raised up to Rio Tinto HSE Group.</li> <li>• The Zero-Spill Objective was launched in 2010 and over 275 projects and initiatives have been implemented to mitigate or reduce those spills.</li> <li>• All spills are reported internally and investigated to identify and implement Corrective Actions.</li> </ul>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements: The Entity Reports spills.</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>• For any significant spill, a close follow-up is done internally and by the Quebec government inspectors.</li> <li>• Spills and environmental incidents are investigated, documented in the Rio Tinto Business Solution (RTBS) and Corrective Actions are taken.</li> <li>• The impacts and the actions are recorded on the spill Report.</li> <li>• Any External Party is informed and advised of the impacts and actions taken.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>• By the P2 Permit, declaring any spill to the authorities is mandatory.</li> <li>• RTA publicly discloses number of spills, notice of violations, prosecutions and number of penalties in its Annual Environmental Report for BC Works.</li> </ul>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>• RTA publicly discloses number of spills, notice of violations, prosecutions and amount of penalties in its annual sustainability Report (<a href="https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/">https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/</a>).</li> <li>• Partial information on significant spills can also be found on the Provincial Ministry of Environment (MELCC) website.</li> </ul> <p>For 2019, there were no information to disclose publicly on the spills and remediation actions, but a Process is in place to do that if required. This helps close the Minor Non-Conformity C raised in 2018 in the First Original Certification Report (ASI-PS Audit Report 1122, ASI-PS original Certificate No. 1).</p> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>• By the P2 Permit, declaring any spill to the authorities is mandatory.</li> <li>• RTA publicly discloses number of spills, notice of violations, prosecutions and number of penalties in its Annual</li> </ul>

CRITERION	RATING	COMMENT
		Environmental Report for BC Works ( <a href="https://www.riotinto.com/operations/canada/bc-works">https://www.riotinto.com/operations/canada/bc-works</a> ).
6.5a Waste management and reporting (strategy)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>The Entity has developed and implemented Policies, Systems, Procedures and Processes that conform to these Waste management and reporting requirements.</p> <p>Province of Québec and BC:</p> <ul style="list-style-type: none"> <li>Hazardous and non-Hazardous Wastes have been characterized, classified and are managed based on priority to prevention, reduction, re-use, recycling and disposal.</li> <li>Action plans to increase the reduction/ recovery/recycling and reduce the disposal are in place and tracked, with targets, economic gains and timeframe.</li> </ul>
6.5b Waste management and reporting (disclosure)	Conformance	<p>Globally, Rio Tinto publishes annually a global sustainable development Report (<a href="https://www.riotinto.com/sustainability/sustainability-reporting">https://www.riotinto.com/sustainability/sustainability-reporting</a>).</p> <p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements: The Entity Reports on Waste management in its annual sustainability Reports.</p> <p>Province of Québec:</p> <p>The Entity publish the information on the volume of hazardous and non-Hazardous Wastes, the treatment method and their improvement/reduction in the 2018 Provincial Sustainability Report through the monthly «Le Lingot» of September 2019 (content available only in French: <a href="https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/">https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/</a>).</p> <p>Province of BC:</p> <p>The Entity Reports on Waste management in its annual sustainability Report. Waste management is reported (summarized) in the Annual BC Works Environmental Report (<a href="https://www.riotinto.com/canada/bc-works-4818.aspx">https://www.riotinto.com/canada/bc-works-4818.aspx</a>).</p>
6.6a Bauxite Residue (storage construction)	Conformance	<p>The Entity's Bauxite Residue storage sites are operated in accordance with legal and regulatory guidelines. Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Bauxite Residue disposal sites are in accordance with a sanitation Certificate issued by the government authorities. The sanitation Certificate subjects RTA to multiple periodic follow-ups and to specific maintenance actions in order to make the sites more watertight and prevent spills of Bauxite Residues into the environment.</li> <li>Bauxite Residue disposal sites are managed in accordance with legal and regulatory guidelines for the mining industry.</li> </ul>

CRITERION	RATING	COMMENT
6.6b Bauxite Residue (integrity checks and controls)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Regular inspections are carried out internally and by specialized external firms to ensure the integrity of the Bauxite Residue disposal sites.</li> </ul>
6.6c Bauxite Residue (water discharge)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Contaminated discharge waters from the Bauxite Residues disposal site are all reintroduced into the manufacturing Process as wash water, and in other Process steps.</li> </ul>
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Contaminated discharge waters from the Bauxite Residues disposal site are all reintroduced into the manufacturing Process as wash water, and in other Process steps.</li> </ul>
6.6e Bauxite Residue (start of the art technologies)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>A new filtration plant for Bauxite Residue is about to be built.</li> <li>The start-up is planned for Q2 2020.</li> <li>Environmental Certificates required by governmental authorities are obtained.</li> </ul>
6.6f Bauxite Residue (remediation)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>The disposal site for Bauxite Residues is currently in operation.</li> <li>Plans are in place for the rehabilitation of the site when it will close.</li> <li>Environmental risks are considered in the rehabilitation plan.</li> </ul>
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>Closed and identified warehouses are exclusively used for the storage of Spent Pot Lining (SPL) prior to processing.</li> <li>Periodic inventories of the contents of each warehouse are made and up-to-date Reports are available.</li> <li>The quantity of SPL in inventory at the time of the Audit complies with the current storage permit issued by the Ministry of the Environment.</li> <li>The treatment plan for all inventories is several years ahead of the zeroing schedule on the storage permit.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>SPL produced at BC Works is sent to the UTB plant in Saguenay (Quebec), which is a specialized SPL treatment Plant.</li> <li>SPL is sent by rail in sealed bin straight after the cleaning of the former smelter. No SPL is sent to landfill.</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>Prior to 1989, untreated SPL were landfilled on-site. The site is now closed and extensive groundwater monitoring is deployed monthly.</li> <li>The P2 multimedia permit limits are monitored and reported in the BC Works Environmental Annual Report.</li> </ul>
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>All carbon and refractory Material generated are processed at the SPL processing plant (UTB).</li> </ul>
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>No untreated SPL is sent to a disposal site. Some of the processing residues are returned to the alumina production Process. Some non-hazardous components from the treatment are sent to an internal disposal site. The atmospheric emissions are treated before by chemical destruction Systems.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>SPL produced at BC Works is sent to the UTB plant in Saguenay (Quebec), which is a specialized SPL treatment Plant.</li> </ul>
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>The SPL and Dross treatment Process is reviewed annually and research projects are underway at the Aluminum Research and Development Center (CRDA) to continually improve the performance of the Process.</li> </ul>
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>Untreated SPL warehouses are closed and have a closed surface water drainage System which is sampled on a regular basis and the results are available.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>SPL produced at BC Works is sent to the UTB plant in Saguenay (Quebec), which is a specialized SPL treatment Plant. SPL is sent by rail in sealed bin straight after the cleaning of the former smelter. No SPL is sent to landfill.</li> </ul>
6.8a Dross (recovery)	Conformance	<p>Dross management is managed at Corporate Level</p> <p>Province of Québec and British Columbia: Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>All Dross generated by the production centers is processed by a specialized external company.</li> <li>All metal (aluminum and alloys) is internally recovered.</li> </ul>
6.8b Dross (recycling)	Conformance	<p>Dross management is managed at Corporate Level</p> <p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>All Dross generated by the electrolysis Process of all production units are treated.</li> <li>The majority of the non-metallic solid part of the treated residues is valued in areas such as cement and steel. A periodic monitoring of shipments are made.</li> <li>A minor proportion is shipped and buried in a standardized landfill for receiving this type of residue. An accounting of the volumes shipped is made and RTA keeps track of them on a periodic basis.</li> </ul>
6.8c Dross (review of alternatives)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>The treatment Process for Spent Pot Lining is reviewed annually and research projects are underway at the Aluminum Research and Development Center (CRDA) to continually improve the performance of the Process.</li> </ul>

#### PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>The main source of water use in Canada is, and by far, to produce hydroelectricity.</p> <p>In Québec, the main reservoir is the Lac St-Jean (a massive lake in the heart of the province) and in BC, it's the Nechako Reservoir a man-made reservoir.</p> <p>Numerous maps are available, amongst others for the purposes of water balance in the watersheds of these reservoirs and a world class hydrology team is intensively working to manage acceptable water levels.</p> <p>For the rest of the Facilities in Canada, the Entity tracks water consumption annually.</p> <p>The data on water consumption are tracked annually on Social and Environmental (S&amp;E) Survey at Rio Tinto level. A summary of a water mass balance is elaborated.</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>Numerous studies were done by RTA Quebec Power Operations to identify the water uses, intakes, withdraws of Lac St-Jean and its basin.</li> <li>The management of the lake levels is done accordingly with the requirements of a provincial decree.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>The Nechako Reservoir for the Kemano Power Operation is also closely monitored, mapped, and managed.</li> </ul>
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CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>The Nechako Reservoir Management Plan summary is published.</li> <li>The Hydrology Team of the RTA Quebec Power Operation also supports the Kemano Power Operation for the Nechako Reservoir level monitoring management.</li> <li>The Kemano and Watershed water balance is documented and monitored.</li> </ul>
7.1b Water assessment (risk assessment)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>Extensive studies have been performed over the last 20 years on RTA impacts over the Lac St-Jean.</li> <li>Several formal impacts assessment studies were conducted and the mitigation controls have been defined in a provincial governmental decree. The decree is reviewed and renewed periodically, with new studies to support the conditions of the Watershed.</li> <li>Extensive and independent regulatory Consultations have been deployed for the purposes of the decree renewal with the affected Communities (including the first nations). These Stakeholders were consulted to the satisfaction of the provincial government.</li> <li>The water-related risks are also addressed at the plant level of the Entity.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>There is a Nechako Reservoir Dam Emergency Plan in case of dam overflow/failure.</li> <li>The Kemano and Watershed water balance and level is documented and monitored.</li> <li>Local operators help mitigate flood risks in time of water surplus to ensure public safety with the help of the Hydrology Team of the Quebec Power Operation.</li> <li>The Area of Influence of the Nechako Reservoir and the Watershed are mapped in detail.</li> <li>The water-related risks are also addressed at the Kitimat smelter level.</li> </ul>
7.2a Water management (management plans)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>A water management plan is in place and regularly monitored for the basin of Lac St-Jean.</li> <li>The water management plan is updated periodically by Quebec Power Operations and is consistent with the current authority Depollution Attestation (a provincial Environmental Permit) and the requirements of the provincial governmental decree presented in 7.1 of this Report.</li> <li>A water management plan is in place and applied for the entire Vaudreuil Alumina Refinery and its Bauxite Residue disposal site and also for the smelters and other plants / sites.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>The water management plans are updated periodically.</li> </ul>



CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>The Nechako Reservoir and Watershed Management Plan is, at least, annually revised. It is continuously monitored and monthly Reports on Material risk are produced for BC Works managers.</li> <li>Material elements and monitoring results of the Watershed Management Plan are available on RTA's Website.</li> <li>A water management plan is in place and applied for the entire Kitimat smelter site.</li> </ul>
7.2b Water management (monitoring)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>The Dams Emergency Plans effectiveness are monitored throughout water surplus period and through drills.</li> <li>The Reservoirs and watersheds monitoring plans are continuously monitored through Systems and diagnostic/expertise from Quebec hydrology team to help optimise effectiveness.</li> <li>Material elements and monitoring results of the Watershed Management Plans are available.</li> <li>For the smelters, the alumina refinery and the other Facilities, regular periodic monitoring of groundwater and surface water quality are performed and Reports are done internally and externally at specified frequencies and adjustments are made continuously to ensure that the water returned to environment meet the required specifications (most of the time required in a Depollution Attestation in Québec or in the P2 Multimedia Permit in BC).</li> </ul>
7.3 Disclosure of water usage and risks	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>The stabilisation of the banks of Lac St-Jean (<a href="https://energie.riotinto.com/index.php?id=1">https://energie.riotinto.com/index.php?id=1</a>) and Hydrological management are reported.</li> <li>All Documents related to Lac St-jean Stabilisation (impacts assessments, Consultation, decree ) are, amongst others, available on the provincial Ministry of environment website. <ul style="list-style-type: none"> <li>Summaries of projects and Reports are also available on the website <a href="http://www.Lelingot.com">www.Lelingot.com</a>, a monthly publication (content available only in French).</li> </ul> </li> <li>The RTA websites are the main tool to provide direct and quick information. In addition, everyone can ask to receive periodic bulletins on water management regarding the Stabilisation Program of the banks of Lac St-Jean.</li> </ul> <p>Province BC:</p> <ul style="list-style-type: none"> <li>Annual BC Works Environmental Reports disclosed water usage, effluent monitoring results and related risks.</li> <li>The Nechako Reservoir/Watershed management plan is disclosed, amongst others, in the "RT-Reservoir 101" presentation.</li> <li>The Water Engagement Initiative of BC Works helps inform Stakeholders about the Reservoir/Watershed Material risks and maintain dialogue to receive requests/grievances.</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>Material element and monitoring results of the Watershed Management Plan are available on RTA's Website (<a href="https://www.riotinto.com/canada/bc-works-4818.aspx">https://www.riotinto.com/canada/bc-works-4818.aspx</a>).</li> </ul>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>In 2009, risk assessments have been conducted on RTA properties to identify impacts on biodiversity (Management Plan Environmental properties).</li> <li>Since 2009, potential impacts from Major Changes are captured as part of project assessment and risk evaluation.</li> <li>All RTA sites have been assessed, including the related hydroelectricity production Facilities (reservoirs, centrals, dams, power lines, communication lines, etc.) and the corresponding watersheds that cover by far the major part of the Entity's Area of Influence in the province of Québec.</li> <li>The RTA specialised "5x5" Risk Matrix is used to evaluate each risk.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>Exhaustive biodiversity risk assessments have been realised by BC Works for the Kemano Power operations in 2011 and for the Kitimat smelter Facilities in 2015 with the help of a specialised consultant firm.</li> <li>These two (2) risks assessments and the corresponding Biodiversity Action Plan (BAP) are regularly reviewed to make sure they are still relevant and up-to-date.</li> <li>The two (2) BAPs are covering BC Works Area of Influence.</li> </ul>
8.2a Biodiversity management (Biodiversity Action Plans)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>RTA has developed and implemented an action plan in 2014 to address biodiversity risks in the areas of Quebec Power Operations Facilities (dams, Lac St-Jean, reservoirs, electrical lines, etc.).</li> <li>Actions have been implemented or are on-going and effective.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>The Kitimat and Kemano Biodiversity plans address Material impacts, have time-bound targets, and are monitored for effectiveness.</li> <li>More specifically, the reservoir and the Kemano Operations affect the Nechako River which is a regulated salmon river. The Nechako Fisheries Conservation Program (NFCP) is jointly monitored with Rio Tinto, Fisheries and Ocean Canada and, BC ministry of Environment.</li> </ul>
8.2b Biodiversity management (Consultation and mitigation hierarchy)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>The Entity's Biodiversity Action Plans (BAPs) are designed in accordance with the Biodiversity Mitigation Hierarchy.</p>

CRITERION	RATING	COMMENT
		<p>Province of Québec:</p> <ul style="list-style-type: none"> <li>Stakeholders and the Communities were involved in the preparation of the BAP through meeting with the towns within formal municipal authorisation Process. Also, the two (2) levels of government (Federal and Provincial) and the Corporation Rivière de Mars were consulted during the Process.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>Stakeholders and the Communities were involved in the preparation of the BAPs through meetings. Also, the two (2) levels of government were consulted during the Process.</li> <li>For the Kitimat Smelter BAP, most of the Consultation with Local Communities/Stakeholders are realised with the Kitimat Public Advisory Committee (KPAC).</li> <li>For the Kemano Power Operation and the Management of the Nechako Reservoir a lot of meetings were realised in the recent past with multiple Groups of Stakeholders.</li> <li>More recently, RT implemented a focussed Water Engagement Initiative (WEI) to group together most of the Nechako Watershed Communities to exchange interests, needs and advice between Stakeholders and facilitate dialogue. The WEI may help identify measures that BC Works can implement voluntarily to enhance operations (including to enhance BAP).</li> </ul>
8.2c Biodiversity management (reporting)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements: Entity's Biodiversity management outcomes are shared.</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>The results of the Lac St-Jean Stabilisation project were regularly published. Regular progress and achievements are also posted on the RTA website <a href="http://www.Energie.RioTinto.com">www.Energie.RioTinto.com</a>. The March 2017 communication bulletin "Le Lingot" includes a review of the spawning development. Periodic fact sheets on the Stabilization project are also posted.</li> <li>The results of the major projects are presented in the Annual Report on Sustainable Development. Regular progress and achievements are also posted on the RTA Quebec Power Operation website at: <a href="http://www.Energie.RioTinto.com">www.Energie.RioTinto.com</a>.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>The achieved BAPs outcomes are published through the Annual Sustainability Reports and progress are also posted: <a href="https://www.riotinto.com/canada/bc-works-4818.aspx">https://www.riotinto.com/canada/bc-works-4818.aspx</a>.</li> <li>Annual Report of the Nechako Fisheries Conservation Program (NFCP) are available on request on the NFCP Website. It includes monitoring of stock and habitat performance and remedial measures.</li> </ul>
8.3 Alien Species	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements: The Entity preventive action plans comply with the national strict regulations and are mainly managed through a risk approach that mainly focusses on oceanic ships and goods packaging.</p> <p>Province of Québec:</p>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>The prevention of Alien Species is strictly regulated under Transport Canada regulations, on which RTA complies.</li> <li>Before entering the Canadian territorial waters, the ballast waters have to be purged and recorded. Once the application is completed and verified, Transport Canada issues an authorization to the ship. Multiple ships were authorised in recent years and a sampling of these ships confirms the Transport Canada approval.</li> <li>In addition, during the summer months, each ship coming from Asia-Pacific requires a Certificate for the Asian Gypsy Moth (AGM), delivered by Transport Canada. On a BNQ sampling of five (5) ships, all ships had their AGM Certificates.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>Since the regulation on Alien Species is federal, the Kitimat Port Facility managers apply the same Processes as in Quebec. Other examples of sample ships also help demonstrate that they had their AGM Certificates.</li> <li>The Kemano T2 Project (the second tunnel) Environmental Management Plan also had provision for the flora and the fauna, including weeds and invasive species prevention and mitigation.</li> </ul>
8.4a Commitment to No Go+in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is Not Applicable to the Entity's Certification Scope.
8.4b Commitment to No Go+in World Heritage properties (existing operations)	Not Applicable	This Criterion is Not Applicable to the Entity's Certification Scope.
8.5a Mine Rehabilitation (best available techniques)	Not Applicable	This Criterion is Not Applicable to the Entity's Certification Scope.
8.5b Mine Rehabilitation (financial provisions)	Not Applicable	This Criterion is Not Applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (Policy)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Policies, guidance and Ethic Codes that include commitments to respect Human Rights are available, integrated and implemented through the Entity activities (See also 2.1). These Documents include, amongst others, the following:</p> <ul style="list-style-type: none"> <li>A Human Rights Policy (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Human-rights-Policy.pdf?rev=a2c618aa39494f25a1f846b2445d9c08">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Human-rights-Policy.pdf?rev=a2c618aa39494f25a1f846b2445d9c08</a>).</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>An Employment Policy (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Employment-Policy.pdf?rev=37a7cd5c0e84433f8972e2837bd863b6">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Employment-Policy.pdf?rev=37a7cd5c0e84433f8972e2837bd863b6</a>).</li> <li>An Inclusion and Diversity Policy (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Inclusion-and-diversity-Policy.pdf?rev=d4ab50759cb543d1b7a97f31f02102e4">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Inclusion-and-diversity-Policy.pdf?rev=d4ab50759cb543d1b7a97f31f02102e4</a>).</li> <li>The Why Human Rights matter guidance (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Why-human-rights-matter-EN.pdf?rev=ff7b1377899441a9b4deadaaac6a48f3">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Why-human-rights-matter-EN.pdf?rev=ff7b1377899441a9b4deadaaac6a48f3</a>).</li> <li>The Way We Work Code of Ethics (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-The-way-we-work-EN.pdf?rev=ccfe41c89a9341ba833ad483dda0ef8a">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-The-way-we-work-EN.pdf?rev=ccfe41c89a9341ba833ad483dda0ef8a</a>).</li> <li>The Why Agreements Matter guidance (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Why-Agreements-matter.pdf?rev=260e7043b750470382c6e7a90167434b">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Why-Agreements-matter.pdf?rev=260e7043b750470382c6e7a90167434b</a>).</li> <li>The Why Cultural Heritage Matters guidance (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Why-cultural-heritage-matters.pdf?rev=cf46a63414e84401aa1642ae6b7fe181">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-Why-cultural-heritage-matters.pdf?rev=cf46a63414e84401aa1642ae6b7fe181</a>).</li> </ul>
9.1b Human Rights Due Diligence (Process)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>A Human Rights Due Diligence Process is set out in the RT Policies and Guidance (presented above in 9.1a) and is based on risk management (which is low risk in Canada).</li> </ul>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Regular meetings and training on Ethics and Integrity (where Human Rights Due Diligence is covered) are conducted for all staff to ensure awareness and Compliance with the Policies.</li> <li>The Ethics and Integrity Group (<a href="https://www.riotinto.com/sustainability/ethics-integrity">https://www.riotinto.com/sustainability/ethics-integrity</a>) is the primary contact for providing advice and receiving complaints or concerns regarding Compliance with Human Rights Policies.</li> <li>A reporting and whistleblowing mechanism (<a href="https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad">https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad</a>) is available for all employees and action plans to fill gaps.</li> <li>Problems (if any), action plans and progress monitoring is done by senior management.</li> </ul>
9.2 Women's Rights	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p>

CRITERION	RATING	COMMENT
		<p>A Due Diligence Process for women's rights is set out in the RT Policies AND Guidance and is based on risk management (low risk in Canada). This Process ensures that:</p> <ul style="list-style-type: none"> <li>• Women are not underrepresented in decision-making roles.</li> <li>• Pay equity is met.</li> <li>• All incidents are investigated where women have been the target of physical and sexual abuse.</li> <li>• The Ethics and Integrity Group (<a href="https://www.riotinto.com/sustainability/ethics-integrity">https://www.riotinto.com/sustainability/ethics-integrity</a>) is the primary contact for providing advice and receiving complaints or concerns regarding Compliance with women's rights Policies.</li> <li>• A reporting and whistleblowing (<a href="https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad">https://app.convercent.com/en-us/LandingPage/60732c5c-fb3c-e811-80e2-000d3ab6ebad</a>) mechanism is available for all employees and action plans to fill gaps.</li> <li>• Problems (if any), action plans and progress monitoring is done by senior management.</li> </ul>
9.3 Indigenous Peoples	Conformance	<p>Based on evidence observed and on interviews with the Entity respondents and with the concerned First Nation Communities, the Entity deploys the following Processes:</p> <p>Rio Tinto (RT) Globally (The ASI Member - <a href="https://www.riotinto.com/sustainability/Communities/cultural-heritage">https://www.riotinto.com/sustainability/Communities/cultural-heritage</a>):</p> <p>Rio Tinto Applies its Code of Conduct (The Way We Work) and Community Management Guides (Why Human Rights Matters, Why Agreement Matters and Why cultural heritage matters). The Rio Tinto Management System includes a Community component in its Health, Safety, Environment and Communities (HSEC) Standards as well as a "Community and Social Performance" Standard.</p> <p>Province of Québec:</p> <p>The Entity maintains a Joint Committee with the Pekuakamiulnuatsh where the issues, concerns and opportunities are directly addressed on a bipartite model. The Lac St-Jean (Lake) Sustainable Management Council was established in 2017 following a vast public Consultation Process for the re-conduction of the Provincial Decree and the corresponding Certificate of Authorisation for the Entity's Lac-St-Jean (Lake) Shores Stabilisation Program.</p> <ul style="list-style-type: none"> <li>• An elected official from Pekuakamiulnuatsh Takuhikan, the political and administrative organisation of the First Nation signed the Agreement in Principle for this participative management model.</li> <li>• Another elected official from Pekuakamiulnuatsh Takuhikan is an official member of the Council.</li> <li>• A representative from the Rights and Protection of the Territory department of Pekuakamiulnuatsh Takuhikan is an active member of the Coordination Team under the Council.</li> <li>• Pekuakamiulnuatsh Takuhikan is also represented on the Stakeholders Committee, the Scientific Committee and the Technical Committee that all support the Council. The Council was established to foster an informed public participation. It is a participatory management model which is independently managed from the Entity. In 2018-2019, the Council hired an</li> </ul>



CRITERION	RATING	COMMENT
		<p>independent HR firm to select the best candidate to become Sustainable Development Committee Coordinator. According to the Council members, the chosen candidate is a person of trust who knows pretty well the Pekuakamiulnuatsh culture and who is able to seek consensus amongst the Stakeholders. The Entity recognised and salute the contribution and expertise from Pekuakamiulnuatsh Takuhikan for the renewal of the Decree.</p> <p>Province of BC:</p> <p>The BC Works footprint is mapped and spans over 500 km and crossed known (mapped) traditional territories of different First Nations. The First Nations engagement is based on openness, respectful and mutually beneficial interests.</p> <p>The Watershed First Nations include many indigenous Communities including those who are not directly adjacent to it. Impact and Benefit Agreements have been signed with the Haisla and Cheslatta Carrier Nations.</p> <p>As an example, the Kitamaat Valley Institute is a 50% partnership between Rio Tinto and the Haisla Nation and Rio Tinto supported the establishment of the Cheslatta training centre that supports the Cheslatta Carrier Nation and other First Nations in the Watershed.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>The Entity has developed and implemented Policies, Systems, Procedures and Processes that is in line with to the Free Prior and Informed Consent requirements.</p> <p>Province of Québec:</p> <p>RTA's footprint on Quebec's territory has not changed significantly since decades. Any project or works are the subject of Consultation, accommodation and assent, i.e. a declaration of non-opposition from Pekuakamiulnuatsh Takuhikan.</p> <p>From the point of view of Consultations with regard to certain sensitive areas, projects which affect a different footprint in the territory of Nitassinan, the traditional territory of the Pekuakamiulnuatsh, are the subject of Consultation. The latest to date is that of dredging in the Baie des Ha! Ha! (the main bay in the Saguenay River) which was presented at a Joint Committee meeting.</p> <p>Province of BC:</p> <p>In BC, communications between First Nations and RT is ongoing. The Process is in constant evolution and improvement. The Kemano T2 Project+(the completion of the Power Operations, 2nd tunnel) has been the object of vast permitting Process through various provincial agencies that included, amongst others, an extensive Consultation with concerned First Nations of the Watershed. The Cheslatta Carrier Nation and the Haisla Nation are participating in the Kemano T2 project with the Entity, ensuring that their cultures and traditions are respected as the construction of the project and Associated Facilities have been undertaken in 2018.</p> <p>More generally, the recent BC Works major projects, e.g. the Kitimat Modernization Plan (KMP: 2012. 2015) and the Kemano T2 Project (2018. 2020), did not significantly modify RTA's footprint in BC and received the proper federal/provincial authorizations/permits. These authorization/permitting Processes involved Due Diligence demonstrations from the promoter regarding the FPIC amongst others with the concerned First</p>

CRITERION	RATING	COMMENT
		<p>Nations whose occupied territories are located within or close to the footprint of the projects. The obtained permits/authorizations from the governments help demonstrate that RTA strive to reach FPIC from the concerned First Nations bands.</p>
<p>9.5 Cultural and sacred heritage</p>	<p>Conformance</p>	<p>The Entity's footprint in the provinces of Québec and BC has not changed significantly since decades.</p> <p>Province of Québec:</p> <p>The Joint Committee and the Lac St-Jean Sustainable Management Council serve to exchange relevant information and Consultations in a participative way about, amongst others, the cultural and sacred heritage of the Pekuakamiulnuatsh. Introduced above, the Lac St-Jean Shoreline Stabilisation Program helps to counter erosion by taking into account the key elements of sustainable development, namely the technical, environmental, social and economic elements with the help of the Lac St-Jean Sustainable Management Council. The concerted approaches and accommodations resulting from this have, amongst other things, enabled the Entity to obtain the approval of the Government of Quebec for the renewal of the Decree and the Certificate of Authorisation for its Lac St-Jean (Lake) Shoreline Stabilization Program (which is a hydroelectric reservoir).</p> <p>Regarding the Lac-St-Jean Shoreline Stabilisation Program, the Entity deploys archeological research for years with the help and expertise of the University of Quebec at Chicoutimi to identify the Pekuakamiulnuatsh's cultural and sacred heritage sites before any intervention is deployed on-site or near these sites for the purposes of the Stabilisation Program. The objective is to prevent or mitigate any negative impacts that may result from the stabilisation works that help prevent or mitigate the erosion of the lake shores. The Pekuakamiulnuatsh's cultural and sacred heritage sites identified through the new or updated archeological research are georeferenced and mapped and the resulting maps are cooperatively shared with Pekuakamiulnuatsh Takuhikan and their Rights and protection of the territory department. Erosion mapping is also updated and shared with this Community with the help of the provincial Ministry of Natural Resources. The expertise of the professional of the Stabilisation Program is also sometimes shared with other Stakeholders like the provincial government or other non-indigenous Communities for the erosion mitigation prevention or mitigation of other sites that are not specifically targeted by the Stabilisation Program. The Audit findings previously made for Criteria 9.3 and 9.4 presented above also support Compliance with this Criterion 9.5.</p> <p>Province of BC:</p> <p>In BC, the Cultural and Sacred Heritage of the impacted First Nations is studied and known by BC Works managers and Community team members.</p> <p>In BC, the "Kemano T2 Project" (the completion of the Hydro Power Operation 2nd tunnel) has been the object of vast permitting Process through various provincial agencies that included, amongst others, extensive Consultation with concerned First Nations of the Watershed. The Cheslatta Carrier Nation and Haisla Nation are participating in the Kemano T2 project with RT, including ensuring their cultures and traditions are respected as the construction of the project and Associated Facilities were undertaken in 2018 and is still ongoing.</p>



CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Conformance	<p>Province of Quebec:</p> <p>The Entity's footprint on Quebec's territory or on the Nitassinan, the traditional territory of the Pekuakamiulnuatsh, has not changed significantly since decades.</p> <p>Province of BC:</p> <p>The Kemano T2 Project will not significantly modify RTA footprint in BC. Consultation with concerned Stakeholders were made through the permitting Process. All feasible means / alternatives have been considered to avoid and minimise physical/economical displacement while balancing environmental, social and financial costs and benefits.</p> <p>A New Day Agreement(<a href="https://www.riotinto.com/news/releases/2020/Cheslatta-Carrier-Nation-and-Rio-Tinto-sign-New-Day-Agreement">https://www.riotinto.com/news/releases/2020/Cheslatta-Carrier-Nation-and-Rio-Tinto-sign-New-Day-Agreement</a>) was signed with RTA and the Cheslatta Carrier Nation in February 2020.</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>Province of Québec:</p> <p>The Entity's footprint on Quebec's territory or on the Nitassinan, the traditional territory of the Pekuakamiulnuatsh, has not changed significantly since decades.</p> <p>No physical or economical displacement occurs in the Certification Scope. No Resettlements was required in the Certification Scope for the Pekuakamiulnuatsh,</p> <p>Province of BC:</p> <p>The Kemano T2 Project will not significantly modify RTA footprint in BC. Consultation with concerned Stakeholders were made through the permitting Process. All feasible means / alternatives have been considered to avoid and minimise physical/economical displacement while balancing environmental, social and financial costs and benefits. According to the project summary presentation Document, the Haisla Nation and Cheslatta Carrier Nation are participating with RT on the project, including ensuring their cultures and traditions are respected as RT undertakes construction of the project.</p> <p>More generally, the recent BC Works major projects, the Kitimat Modernisation Plan (KMP: 2012-2015) and The Kemano T2 Project (2018-2020) did not involve physical displacements as they did not significantly modify RTA footprint in BC. A Resettlement Action Plan according to the applicable requirements of IFC Performance Standard 5 have not been necessarily required yet.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Audit findings previously made for Criteria 9.3, 9.4 and 9.5 presented above support Compliance with this Criterion 9.7 for the First Nations.</p> <p>The Entity deploys his Community and Social Performance Processes previously presented in this Report. Impacts Assessment Processes of the Entity and Provincial Laws are governing Local Communities rights and customs.</p> <p>Province of Québec:</p> <p>The Entity is maintaining Good neighborhood Committees for its main Facilities to exchange information, opinions and develop opportunities to respect and support their livelihoods with a</p>

CRITERION	RATING	COMMENT
		<p>constructive approach.</p> <p>The Vaudreuil Beyond (VB) 2022 Impact Assessment Processes demonstrate how public Consultation was deployed, how the concern Local Community will be treated in this project and the corresponding Entity's Engagement. Please see the VB 2022 Website at (only available in French):  <a href="https://www.consultationsvaudreuil.com/avenir-vaudreuil">https://www.consultationsvaudreuil.com/avenir-vaudreuil</a>.</p> <p>Province of BC:</p> <p>The Kitimat Public Advisory Committee (KPAC) consists of 18 members from the main Stakeholders. The committee met regularly. The Water Engagement Initiative (WEI) provides a formal forum for every concerned Stakeholders of the Nechako Watershed/Reservoir (Kemano Power Operations) to communicate and monitor complaints, grievances and requests for information.</p>
9.7b Local Communities (impacts)	Conformance	<p>The Audit findings previously made for Criteria 9.3, 9.4 and 9.5 presented above support Compliance with this Criterion 9.7 for the First Nations.</p> <p>The Entity deploys his Community and Social Performance Processes previously presented in this Report. Impacts Assessment Processes of the Entity and Provincial Laws are governing Local Communities rights and customs.</p> <p>Province of Québec:</p> <p>The Entity is maintaining Good neighborhood Comities for its main Facilities to exchange information, opinions and develop opportunities to respect and support their livelihoods with a constructive approach.</p> <p>The Vaudreuil Beyond (VB) 2022 Impact Assessment Processes demonstrate how public Consultation was deployed, how the concern Local Community will be treated in this project and the corresponding Entity's Engagement. Please see the VB 2022 Website at (only available in French):  <a href="https://www.consultationsvaudreuil.com/avenir-vaudreuil">https://www.consultationsvaudreuil.com/avenir-vaudreuil</a>.</p> <p>Province of BC:</p> <p>An Environmental Effects Monitoring (EEM) program was developed and implemented for the Kitimat Modernization Project. The results, improvements and recommendations are shared with the Community.</p> <p>In the Province of British Columbia, The Kitimat Public Advisory Committee (KPAC) consists of 18 + members from Community organizations.</p> <p>The KPAC meets regularly to communicate permits, operational information, business updates and shares complaints, grievances and requests for information.</p> <p>In the Watershed area Rio Tinto has established a Water Engagement Initiative (WEI) that provides an opportunity for the Community members, Stakeholders and organizations of the Nechako Watershed/Reservoir (Kemano Power Operations) to share interests, concerns and priorities with Rio Tinto. It is also an avenue to monitor complaints, grievances and requests for information.</p>

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Conformance	<p>For the Firsts Nations of Canada: The Audit findings previously made for Criteria 9.3, 9.4 and 9.5 presented above also support Compliance with this Criterion 9.7 for the Firsts Nations. The Entity deploys his Community and Social Performance Processes previously presented in this Report. Impacts Assessment Processes of the Entity and Provincial Laws are governing Local Communities rights and customs. The Entity is maintaining Good neighborhood Committees for its main Facilities to exchange information, opinions and develop opportunities to respect and support their livelihoods with a constructive approach.</p> <p>Province of Québec:</p> <p>The Vaudreuil Beyond (VB) 2022 Impact Assessment Processes demonstrate how public Consultation was deployed, how the concern Local Community will be treated in this project and the corresponding Entity's Engagement. Please see the VB 2022 Website at (only available in French): <a href="https://www.consultationsvaudreuil.com/avenir-vaudreuil">https://www.consultationsvaudreuil.com/avenir-vaudreuil</a>.</p> <p>Province of BC:</p> <p>A new website has been implemented in 2018 to communicate with Stakeholders. This communication tool tracks requests and exchanges with the Local Community.</p> <p>Mechanisms were in place to have the Communities involved in flood mitigation &amp; water management considerations. The KPAC consists of 18 + members from Community organizations. The KPAC meets quarterly to communicate permits, operational information, business updates and shares complaints, grievances and requests for information. In the Watershed area Rio Tinto has established a Water Engagement Initiative (WEI) that provides an opportunity for the Community members, Stakeholders and organizations of the Nechako Watershed/Reservoir (Kemano Power Operations) to share interests, concerns and priorities with Rio Tinto. It is also an avenue to monitor complaints, grievances and requests for information.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Globally, Rio Tinto Security Standard requires a security risk assessment and a management plan for each location. RTA has performed the risk assessment in 2017 on all sites and assesses over 40 different risks.</p> <p>Controls are in place on all sites and their efficiency have been verified in 2018, as part of a formal internal corporate Audit. There is no conflict or High-Risk areas.</p>
9.9 Security practice	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> <li>• Rio Tinto Security &amp; Human Rights and Security Risk Analysis &amp; Management are the main guidance Documents, on which RTA sites follow.</li> <li>• Canada has been assessed as a Low Risk country.</li> <li>• There is no armed personnel on RTA sites.</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>Security management and supervisory staff have been trained in 2017 on RT Risk Management Plan and all security guards have been scheduled for training on this specific plan.</li> </ul> <p>Province of BC:</p> <ul style="list-style-type: none"> <li>Canada has been assessed as a Low Risk country.</li> <li>The site has an unarmed security team. Only safety firearms are used against wildlife and predators, if required.</li> <li>All guards have been trained and continuous training is on-going.</li> </ul>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Rights of association and Workers are supported by RT Policies and the legislation in Canada.</li> <li>Unions or Workers can organise in council without interference by the employer.</li> <li>Activities that may interfere with Freedom of Association and the right to bargain collectively are covered by laws, regulations and collective's Agreements.</li> <li>Unions are established or supported to ensure legitimate representation of Workers.</li> <li>There is evidence that there is no interference to union or organizing efforts.</li> </ul>
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Rights of association and Workers are supported by RT Policies and the legislation.</li> <li>Collective Bargaining is a voluntary Process that takes place between Workers' representatives and employer representatives. It usually focuses on negotiating terms and conditions of employment, such as wages, hours of work, conditions, grievance Procedures, and the rights and responsibilities of each party.</li> <li>Once a collective Agreement is concluded, there is evidence that it is implemented in the company.</li> <li>Concluded collective Agreements are implemented by the Entity.</li> </ul>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Rights of association and Workers are supported by the RT Policies, Codes of Ethics and the Canadian legislation.</li> </ul>
10.2a Child Labour (minimum age)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>RT Policies are in place to avoid that children under 15 years old are hired by the company.</li> <li>Children's rights are supported by legislation in Canada.</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>A Supplier Code is applied for the subcontractors and also cover the minimum age of their employees.</li> </ul>
10.2b Child Labour (hazardous)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>In the context of hazardous work, the minimum age is considered to be 18 years old (according to RT Policies).</li> <li>Unsafe work is usually determined under Applicable Laws.</li> <li>Hazardous work prevention and mitigation are covered in Chapter 11 of this Report.</li> </ul>
10.2c Child Labour (worst forms)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>In the event that Child Labour cases are identified in the supply chain, the Ethics and Integrity Group is the primary contact for providing advice and receiving complaints or concerns regarding Compliance with Child Labour Policies and laws. A reporting and whistleblowing mechanism is available for all employees and Contractors. Action plans mechanisms to fill gaps (if any) will be put in place.</p>
10.3a Forced Labour (Human trafficking)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>RT Policies, Codes of Ethics and laws are in place to avoid that there is Human trafficking that can lead to Forced labour, and that, in any of its forms, at the level of the company (including the Entity) and its subcontractors.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>RT Policies and local regulations are in place to avoid that there are any form of deposit, recruitment fees through employment or recruitment.</p> <p>Prohibitions related to forced labor are supported by numerous legislations.</p>
10.3c Forced Labour (Migrant Workers)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>RT Policies and local regulations are in place to avoid that there are any form of deposit or guarantee payments from Migrant Workers.</p> <p>Prohibitions related to Migrant Workers are supported by numerous legislations. Policies and laws are in place to avoid any form of deposit or guarantee payments from Migrant Workers.</p>
10.3d Forced Labour (Debt Bondage)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>RT Policies and local regulations are in place to avoid that Workers are held in Debt Bondage to pay off a debt.</p> <p>Prohibitions related to hold Workers are supported by numerous legislations.</p>

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>Workers have freedom of movement in the workplace or on the sites except where Occupational Health and Safety (OH&amp;S) special precaution or training is required.</p> <p>Other than for OH&amp;S risks prevention or mitigation, RT Policies protect the freedom of free movement of Workers in the workplace or on and between the Entity's sites.</p>
10.3f Forced Labour (retention of identity papers, permits, Certificates)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>RT Policies and laws are in place to avoid that the company keeps original copies of Workers' IDs, work permits, travel Documents or training Certificates.</p> <p>Prohibitions relating to retaining Documents for obtaining Forced labour are supported by legislation.</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>RT's Policies and local regulations are in place to protect the rights of Workers to leave their jobs without penalty when they give a notice of a reasonable length to their employer.</p>
10.4 Non-Discrimination	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>In Canada, laws protect Human Rights and gender equality. Prohibitions related to Discrimination are supported by legislation.</p> <ul style="list-style-type: none"> <li>• RT's Policies are communicated internally to all Workers (awareness session - intranet site - website - posting, etc.).</li> <li>• Senior management ensures that staff are aware of Non-Discrimination Policies.</li> <li>• Staff are aware of company Policies that are directly related to their position.</li> <li>• Awareness and reinforcement help employees to integrate Policies into their work and Procedures.</li> <li>• Policies are available to external Stakeholders to raise awareness of company commitments (website - posting - etc.).</li> <li>• In the event that cases of Discrimination are identified, the Ethics and Integrity Group is the primary contact for providing advice and receiving complaints or concerns about Discrimination. A reporting and whistleblowing mechanism is available for all employees and action plans mechanisms to fill gaps (if any).</li> </ul>
10.5 Communication and engagement	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• Several means and channels of communication are established to ensure open communication with Workers and their representatives (e.g. unions, delegates), regarding working conditions and any problems related to the workplace.</li> <li>• These communication channels operate without threat of reprisal, intimidation or harassment for participation or problem identification (e.g. Speak Out - Yammer- etc.).</li> <li>• See as well the findings for the following Criteria in this Report: <ul style="list-style-type: none"> <li>• 10.1 on Freedom of Association and the right to Collective Bargaining.</li> </ul> </li> </ul>



CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>11.3 Employee Engagement in Health and Safety.</li> </ul>
10.6 Disciplinary practices	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>RT's Policies and local regulations are in place to avoid unreasonable practices in the workplace to apply disciplinary measures.</li> <li>Supervisors and subcontractors are trained in the proper management of any disciplinary matter.</li> <li>Security guards are not allowed to take part in the personal discipline. Their role is clearly limited to the security of the Facilities and the safety of the personnel and Products located on the premises.</li> <li>Disciplinary Procedures in place and described in collective Agreements provide a fair way to deal with Workers who do not meet the company's Standards of work conduct and performance.</li> <li>Grievance Procedures and resolution mechanism are a means for employees to raise concerns about management practices or disciplinary decisions.</li> <li>There are Processes in place to allow Workers to Report unfair treatment to someone other than their supervisor. (See also 10.5 on that subject).</li> </ul>
10.7a Remuneration (living wage)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>There are several Policies, Processes and Procedures that are supporting the wages and benefits.</li> <li>Salary scales are established which demonstrate that wages are sufficient to meet the needs of employees to maintain a decent and safe Standard of living in the Community.</li> <li>Workers receive higher wages for work beyond normal. The rate of these hours is fixed by contract or collective Agreement.</li> <li>Different rates are applied for regular Overtime and Overtime worked at night, statutory holidays and weekly rest days. All Workers have access to discretionary income.</li> </ul>
10.7b Remuneration (method of payment)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>Workers receive their wages regularly as stipulated in their employment contracts by bank wire transfer.</li> <li>The correct rate is paid for regular hours and Overtime worked at night, weekly rest days and statutory holidays.</li> <li>Payments are made regularly directly to the Workers, in accordance with the legislation in force. Policies and local regulations are in place to avoid that payments are delayed, deferred or withheld.</li> <li>Only deductions authorized by national and provincial legislation are allowed and when they are done, actions are taken with the full consent and understanding of the Workers.</li> <li>Clear and transparent information is provided to Workers on hours worked, rates of pay and the calculation of statutory deductions, so that they have complete monitoring of their income.</li> </ul>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> <li>• Payment in the form of goods or services (e.g. moving, etc.) is not used to create a state of dependence of the Worker on the employer and does not constitute a part of Workers' wages.</li> <li>• Any amount deducted from the salary is determined according to a regular Procedure. Legitimate deductions include income taxes, pension contributions, union membership, etc.</li> <li>• Workers are informed of the conditions and extent of all deductions made in their pay slip.</li> </ul>
10.8 Working Time	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• There are several Applicable Laws relating to Working Time.</li> <li>• Collective Agreements deal with hours of work, Overtime, breaks and holidays.</li> <li>• Applicable Laws and conventions provide Processes to ensure that Workers are not forced to work beyond the number of hours allowed.</li> <li>• Overtime is voluntary unless it is part of a legally recognized collective Agreement. Workers are not forced to work Overtime under threat or dismissal.</li> <li>• Timesheets are used to record the number of hours worked by each Worker and to track Overtime and leave.</li> </ul>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• Rio Tinto (RT) has released Health, Safety, Environment (HSE) and Communities (HSEC) Policy (<a href="https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-HSEC-Policy.pdf?rev=433bf114f20d403f83c995502503b1cb">https://mc-56397411-4872-452d-b48e-428890-cdn-endpoint.azureedge.net/-/media/Content/Documents/Sustainability/Corporate-Policies/RT-HSEC-Policy.pdf?rev=433bf114f20d403f83c995502503b1cb</a>), which applies to all RT locations.</li> <li>• The Policy, has been presented to all employees and is part of the HSE induction for new employees and refresher for the others.</li> <li>• Please also see Criterion 1.1 of this Report about Legal Compliance.</li> </ul>
11.1b Occupational Health and Safety (OH&S) Policy (Workers and Visitors)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• The Principles of the HSEC Policy are explained in a Document "The Way We Work", which is read and reviewed annually by all RT staff.</li> <li>• The Policy is posted in different areas of the sites and on the intranet.</li> <li>• The Policy is also presented to the Visitors and the Contractors.</li> </ul>
11.1c Occupational Health and Safety (OH&S) Policy	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>The RT HSEC Policy includes a commitment to the prevention of accidents, Compliance with legal requirements and beyond, achieving world class performance, thus creating a strong safety</p>



CRITERION	RATING	COMMENT
(Applicable Law and Standards)		<p>culture. Legal watch and regulatory monitoring and verification are implemented.</p> <p>Province of BC:</p> <p>In Q3 2018, a Minor NC was raised about this Criterion: "The Occupational Health and Safety (OH&amp;S) Policy Commitment to comply with applicable OH&amp;S Laws and Regulation has not been regularly or recently reviewed at BC Works. The verified evidence demonstrates that the last OH&amp;S Laws and Regulation Compliance Audit was officially deployed in 2013 at BC Works."</p> <p>As a Corrective Action, an OH&amp;S Laws and Regulation Compliance Audit have been deployed by the Entity in Q2 2019, a Corrective Action Plan is currently in implementation to correct the raised gaps and an extensive Audit program has been reconducted for the upcoming years to prevent the re-occurrence of that kind of gap. The RT HSEC Policy is then more deeply implemented and this BNQ's Minor NC is now closed.</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <p>The RT HSEC Policy does refer to the right of Workers to understand the hazards and the safe practices for their work, and also included the duty to refuse or stop any unsafe work. HSE Risk prevention and mitigation are regularly monitored and communicated and Workers are invited to share any inputs that may help continuous improvements.</p>
11.2 OH&S Management System	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• Rio Tinto HSEC Management System is fully implemented at all RTA sites.</li> <li>• The HSEC Management System includes 17 elements, aligned with the OHSAS 18001 Standard requirements.</li> <li>• Risks are evaluated at three (3) levels, with a Critical Risk Management (CRM) Program, to manage and Control critical risk.</li> <li>• Legal obligations are defined and verified, through Compliance Audits. A five (5) year calendar has been implemented to cover all Facilities and all obligations.</li> <li>• OHS objectives, targets and action plans are prepared yearly, implemented and monitored to track the achievement.</li> <li>• The Management System is regularly audited and the findings and results are presented at the annual management review.</li> </ul> <p>Observations made during the BNQ Audit tour and Lean Management meetings N1 to N3:</p> <ul style="list-style-type: none"> <li>• The OHS Management System is well implemented at the level of production operations in each sector of a given plant.</li> <li>• During the Lean Management daily follow-up meetings (held from level N1 - Management to N3 - Operation), there is a strong emphasis on OHS risk management according to the activities of the day (it is the top priority).</li> <li>• Critical Risk Management and critical Control checklist (CCC) exercises are rigorously performed at all levels.</li> </ul>

CRITERION	RATING	COMMENT
11.3 Employee engagement on health and safety	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• Joint Health and Safety committees (CSS) are in place at each site to improve the OHS performance and address issues, including Worker's concerns and suggestions.</li> <li>• Each committee meets regularly, with an agenda. Minutes of the meetings are recorded and posted on HSE billboards. Actions arisen from the meetings are tracked in the minutes or in a separated excel file and are also posted.</li> <li>• In addition, larger Facilities such as Kitimat, Alma, Grande-Baie and Laterrière smelters or the Jonquière Complex (where the Arvida and AP-60 smelters are grouped together with the Vaudreuil Alumina Refinery) have Prevention Safety Teams (departmental teams), which Report to the site Safety committee and address local specific issues.</li> </ul>
11.4 OH&S performance	Conformance	<p>Based on the provided Objective Evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> <li>• The OH&amp;S performance is tracked continuously and reported on a monthly basis.</li> <li>• Lagging indicators include frequency and severity on lost time and recordable accidents, all injuries, near-misses and occupational illnesses.</li> <li>• Leading indicators include Critical Risk Management (CRM), Maturity level, investigation of maximum reasonable outcome (MRO) and Closure of actions.</li> <li>• Data are monitored at site level, entered in the Rio Tinto Business System (RTBS) and consolidated at the RTA/RT levels. The Report presents the comparison site by site. The Rio Tinto Reports gather all RT businesses and provides a benchmark comparisons.</li> <li>• Benchmark comparisons are also done with the other peer Primary aluminium companies members from: <ul style="list-style-type: none"> <li>• The Aluminium Association of Canada (AAC).</li> <li>• The International Aluminium Institute (IAI).</li> </ul> </li> </ul>

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

Revision	Date	Notes
0	16 March 2018	Issued
1	13 April 2018	Comments section updated by Audit firm
2	18 January 2019	Updated to reflect Certification Scope change
3	10 September 2020	Surveillance Audit including an update of a reference to Montreal Headquarters in the Certification and Scope.