
ASI CERTIFICATION
PERFORMANCE
STANDARD



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 2021

DATE OF EXPIRY

15 MARCH 2024

CERTIFIED SINCE

16 MARCH 2018

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a light green background.

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

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Rio Tinto Aluminium's activities across Canada including the production of alumina (Vaudreuil Refinery, Québec); aluminium smelting and casting (Alma, AP-60, Arvida, Grande-Baie and Laterrière Smelter's in Québec and Kitimat Smelter in British-Columbia); aluminium casting (Beauharnois and Dubuc/PLS in Québec); unloading, storage, loading and ground transportation of raw materials and goods (Port and Rails, Québec); electrical power generation and distribution (Power Operations in Québec and British-Columbia); treatment of spent pot lining (SPL Treatment Plant, Québec) and; head office support and research and development (Headquarters in Montréal and Saguenay, Québec).

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME Rio Tinto

ENTITY NAME Rio Tinto Aluminium (RTA) Canada

CERTIFICATION SCOPE Rio Tinto Aluminium's activities across Canada including the production of alumina (Vaudreuil Refinery, Québec); aluminium smelting and casting (Alma, AP-60, Arvida, Grande-Baie and Laterrière Smelter's in Québec and Kitimat Smelter in British-Columbia); aluminium casting (Beauharnois and Dubuc/PLS in Québec); unloading, storage, loading and ground transportation of raw materials and goods (Port and Rails, Québec); electrical power generation and distribution (Power Operations in Québec and British-Columbia); treatment of spent pot lining (SPL Treatment Plant, Québec) and; head office support and research and development (Headquarters in Montréal and Saguenay, Québec).

SUPPLY CHAIN ACTIVITIES

- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting / Refining
- Casthouses
- Semi-Fabrication

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Initial Certification Audit (9 – 26 January 2018)
- Scope Change Audit (4 September – 4 October 2018)
- Surveillance Audit (30 September – 28 February 2020)
- Re-Certification Audit (6 October 2020 – 16 February 2021)

AUDIT FIRM BNQ

AUDIT DATE

- 9 – 26 January 2018 (Initial Certification Audit)
- 4 September – 4 October 2018 (Scope Change Audit)
- 30 September 2019 – 28 February 2020 (Surveillance Audit)
- 6 October 2020 – 16 February 2021 (Re-Certification Audit)

AUDIT REPORT SUBMISSION

- 7 March 2018 (Initial Certification Audit)
- 26 November 2018 (Scope Change Audit)

-
- 21 August 2020 (Surveillance Audit)
 - 28 February 2021 (Re-Certification Audit)
-

AUDIT SCOPE

Initial Certification Audit (9 - 26 January 2018)

- 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)
- Laterrière Smelter (Saguenay QC, Canada)
- Dubuc / PLS (Saguenay QC, Canada)
- Spent Pot Lining Treatment Plant (Saguenay QC, Canada)
- Québec 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 ASI Performance Standard were included in the Audit Scope.

Scope Change Audit (4 September – 4 October 2018)

- 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 ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (30 September – 28 February 2020)

- 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)
- Laterrière Smelter (Saguenay QC, Canada)
- Québec 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 ASI Performance Standard were included in the Audit Scope.

Re-Certification Audit (6 October 2020 – 16 February 2021)

The audit scope included operations in Canada including the production of alumina (Vaudreuil Refinery, Québec); aluminium smelting and casting (Alma, AP-60, Arvida, Grande-Baie and Laterrière Smelter's in Québec and Kitimat Smelter in British-Columbia); aluminium casting (Beauharnois and

Dubuc/PLS in Québec); unloading, storage, loading and ground transportation of raw materials and goods (Port and Rails, Québec); electrical power generation and distribution (Power Operations in Québec and British-Columbia); treatment of spent pot lining (SPL Treatment Plant, Québec) and; head office support and research and development (Headquarters in Montréal and Saguenay, Québec)..

Supply chain activities included in the Audit Scope:

- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting / Refining
- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the audit (October 2020 - February 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

15 March 2021 – 14 March 2024

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DATE

14 September 2022

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. To ensure legal compliance, the Entity deploys the following processes:</p> <ul style="list-style-type: none"> - Rio Tinto Management System and Performance Standards for Health, Safety, Environment and Communities (HSEC)*. - Ethics & Compliance Business Integrity Standards*. - Company Code of Conduct (The Way We Work)*. - Legal Register, Legal watch and regulatory compliance checks in HSE for the operations. - ISO 14001 certification for smelters, refinery and power operations and ISO 9001 in the casting centres. - Tax Service for tax requirements. - Human Resources Service and Labour Law. - Legal Service for any other law/ regulation. <p>(* information publicly available at https://www.riotinto.com)</p>
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"> - Anti-Corruption Policies* and systems are in place and officially approved by the highest level of the company. These provide an awareness of the corruption, bribery, fraud and economic crimes risks and the basis for integrating an overall anti-corruption culture into the organization. - These Policies are communicated appropriately to all employees and stakeholders. The penalties that apply in case of non-compliance are mentioned. - Ethics and Compliance Team* is the primary contact for providing advice on business integrity matters and the Business Conduct Office is responsible for managing the confidential reporting program and responding to allegation of misconduct or breach of policies or law. This confidential reporting program* is available to all employees, contractors, suppliers, clients and community members. - Periodic training on anti-corruption is mandatory for employees. - Policies and procedures* appropriately address donations, charitable contributions and sponsorships. - 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.

CRITERION	RATING	COMMENT
		<p>- The risk assessments to identify the parts of the company that are exposed to the risk of corruption is made on a case-by-case basis and are reviewed regularly.</p> <p>In conclusion, a documented and mature program is established to mitigate the risks of anti-corruption, including providing training, formal approval procedures and increased monitoring of reported situations.</p> <p>(* information publicly available at https://www.riotinto.com)</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"> - Existence of an Organizational Code of Conduct - The Way We Work* in which commitments regarding: <ol style="list-style-type: none"> 1) Business integrity, including the areas of environmental, social and governance performance covered by ASI. 2) The inclusion of a commitment to respect the rights of indigenous peoples. 3) Safety and health, human rights, communities, employment and inclusion commitments. - 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. - Awareness sessions are planned and implemented to inform employees and company partners, service providers and suppliers about the principles and values of the organization. - Ethics and Compliance Team* is the primary contact for providing advice on business integrity matters and the Business Conduct Office is responsible for managing the confidential reporting program and responding to allegation of misconduct or breach of policies or law. This confidential reporting program* is available to all employees, contractors, suppliers, clients and community members. <p>(* information publicly available at https://www.riotinto.com)</p>
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 Performance Standard. A set of environmental, social and governance policies*, comply with the ASI Performance Standard. Evidence of implementation is available. Based on the provided objective evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> - Policies include statements of principles and intention which support achievement of the requirements in the ASI Performance Standard. - Policies are relevant to activities and their potential impacts.

CRITERION	RATING	COMMENT
		(* information publicly available at https://www.riotinto.com)
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>Senior management endorse, support through provision of resources and regularly review the policies. 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"> - Business activities are in accordance with the policies. - Environmental, social and governance policies* are updated regularly. - Policies commitments are incorporated into operational policies and appropriate procedures. - Ethics and Compliance Team * is the primary contact for providing advice on business integrity matters and the Business Conduct Office is responsible for managing the confidential reporting program and responding to allegation of misconduct or breach of policies or law. This confidential reporting program* is available to all employees, contractors, suppliers, clients and community members for 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. - Problems and progress monitoring is undertaken by senior management. <p>(* information publicly available at https://www.riotinto.com)</p>
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"> - Policies are communicated internally to all workers (awareness - intranet - website - posting, etc.). - Senior management ensures that staff are aware of the social and governance policies relevant to the specific responsibilities and tasks they perform. - Employees are aware of policies that are directly related to their position. - Awareness and reinforcement help employees and management to integrate policies into their work and procedures. - Policies are available to external stakeholders to raise awareness of the company's commitments (website - posting - etc.): https://www.riotinto.com/sustainability/policies#policy-results_q=HSE%20policy&policy-results_e=0
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"> - The Executive Director - Operation - Atlantic, has renewed the General Manager (GM), Environment and Sustainability, as ASI Manager for the Canadian facilities which together constitute the Entity. - The GM Environment and Sustainability is on the RTA ASI Steering Committee and is in control of the ASI Program for the Atlantic Operations.

CRITERION	RATING	COMMENT
		<p>- The Principal Advisor, ASI & Climate Change - Atlantic, operationalises ASI for the Entity and helps orientate the operations through the ASI way.</p>
<p>2.3a Environmental and Social Management Systems (environmental)</p>	<p>Conformance</p>	<p>All Canadian facilities targeted by the ASI Performance Standard 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: https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=&noCertificat=50650-1-06</p>
<p>2.3b Environmental and Social Management Systems (social)</p>	<p>Conformance</p>	<p>The Internet Portal provides information related to this Criterion. The Health, Safety, Environment and Communities (HSEC) Standards* are implemented and meets these requirements. The Rio Tinto Management System* includes a community component in its HSEC Standards* as well as a "Community and Social Performance" 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. Locally, facilities maintain Good Neighbour 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 (OHS) parts, see Principle 11 of this document.</p> <p>(* information publicly available at https://www.riotinto.com)</p>
<p>2.4 Responsible Sourcing</p>	<p>Conformance</p>	<p>The Entity has implemented a Supplier Code of Conduct* that meets the 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"> - The Procurement Group Standard. - The Procurement Group Website* allows access to the responsible procurement tools, for example the following: - The Code of Ethics "The Way We Work"*. - Rio Tinto's Global Supplier Code of Conduct*. - Business Integrity Standard*. - Human Rights Policy*. <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> <p>(* information publicly available at https://www.riotinto.com)</p>

CRITERION	RATING	COMMENT
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"> - a Risk Management Standard*. - a Risk management policy*. - an Inclusion & Diversity Policy*. - the "Why human rights matter" Guide*. - the "Why agreements matter" Guide*. - the Employment Policy*. - the Communities and Social Performance standard*. - Rio Tinto's major projects are audited by a dedicated corporate RT team in this area. <p>Québec'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"> - expansion of the Vaudreuil plant's Bauxite residue disposal site (the VB 2022 Project Phase 2). - expansion and redevelopment of docks at port facilities IPSF. <p>All audited projects have been analysed with environmental, social, cultural and human rights risk impacts and has identified mitigation measures accordingly.</p> <p>(* information publicly available at https://www.riotinto.com)</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 drills and training is in place to track and document the exercises. Drills are performed and debriefing from drills and real events helps improve the effectiveness of the BRRP for the Entity and for Rio Tinto.</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"> - A merger and acquisition process is deployed by Rio Tinto (project evaluation standard). - There is a merger and acquisition department in the corporate offices. - Any major merger and acquisition project is subject to a social, environmental and governance due diligence process in accordance with established guidance. <p>Corporate processes are in place if ever there are mergers and acquisitions projects.</p>

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	<p>Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following processes/ means:</p> <ul style="list-style-type: none"> - The HSEC site closure standards deployed by the Closure Working Group (under revision). - The Closure Guidance Note. - The Closure Working Group Charter. - The Rio Tinto Closure Steering Committee (CSC) Terms of Reference. - The Closure Steering Committee Dashboard. <p>In the Province of Québec, the management process for the environmental, social and governance issues related to site closure was verified through the partial decommissioning project in Arvida, Valorisation Arvida Asset (VAA). The following processes/ means have been audited:</p> <ul style="list-style-type: none"> - Pre-Feasibility study is completed at 90% (social, environmental, economic, feasibility, etc.). - Risk assessments were undertaken and are reviewed quarterly. - Organisation chart deployed, with leaders identified on all sections, based on Rio Tinto Guidance Note. - Integration of the decommissioning team with the operations team, to ensure smooth transition. - No impacts assessment required, Arvida current permit valid through 2025. <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 aligned with the Global Reporting Initiative (GRI) G4 Guidelines: https://www.riotinto.com/sustainability/sustainability-reporting</p> <p>The Entity publicly disclosed a satisfactory Sustainable Development Report for the Province of Québec where it mainly operates and was sent to all employees (content available only in French): https://console.virtualpaper.com/le-lingot-archives/no8-septembre-2019/#10/</p> <p>British-Colombia (BC) Works has published annual Sustainability report and was sent to all employees: https://www.riotinto.com/canada/bc-works</p> <p>In addition, BC Works has also produced an Annual Environmental Report since 2008 to share environmental performance with the stakeholders. The Report is submitted to the provincial government and made available to the public through the Rio Tinto website:</p>

CRITERION	RATING	COMMENT
		https://www.riotinto.com/canada/bc-works and the Kitimat Public Advisory Committee (KPAC).
3.2 Non-Compliance and liabilities	Minor Non-Conformance	<p>The Entity deploys the following processes:</p> <ul style="list-style-type: none"> - Non-compliances and liabilities are published in the Entity's Sustainability Reports. <p>For the province of Québec, non-compliance and liabilities are publicly disclosed through the Sustainable Development Report at the following link (the content is available only in French): https://console.virtualpaper.com/le-lingot-autres/rapport-de-developpement-durable-pour-le-quebec-2019/#2/</p> <p>However, two environmental fines issued in 2019 in the province of Québec were not publicly disclosed by the Entity in the 2019 Sustainable Development Report.</p> <p>For British-Colombia (BC), non-compliance and liabilities are publicly disclosed through the Rio Tinto website at: https://www.riotinto.com/can/canada-operations/bc-works</p> <p>Non-compliances and liabilities are published in the BC Works Sustainability Report 2019. For example, the environmental non-compliances identified during the compliance audit are mentioned in the report. The BC Works Annual Environmental Report 2019 details all the non-compliances issued in 2019, with the corrective actions.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>This requirement is covered through Transparency Statement, Business Integrity Standard and Procedure deployment. Based on interviews and evidence observed, this Criterion is met. The Entity deploys the following processes:</p> <ul style="list-style-type: none"> - Québec's and BC laws and regulations for taxes, permit and other official authorisations are strict and prescriptive. - Payments to governments are independently verified by independent accounting firms. - The federal (Canada) and provincial governments carry out certain audits directly. - Rio Tinto has a Tax Department strictly supervised by continuous training and by the following processes: <ul style="list-style-type: none"> - Rio Tinto Business Integrity Standard. - Transparency Statement. - Application of procedural control requirements in relation to payments to governments. - Code of Conduct (The Way We Work). - Rio Tinto Tax Manual. - Rio Tinto Taxes Paid report 2019 that disclose publicly payment to authorities.
3.3b Payments to governments (disclosure – Bauxite Mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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"> - For First Nations requests, see Principle 9. - Each major facility deploys a Good Neighbourhood Committee to interact with relevant stakeholders. - Rio Tinto Regional Security Department allows to receive any complaints or relevant request. - Different websites provide information to relevant stakeholders. - 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. - The Rio Tinto Business Solution (RTBS) enables the tracking of all relevant requests or complaints from stakeholders. - Efficient process to address and close complaints, with KPI follow-up. - Rio Tinto's ISO 14001 certification enables the BNQ to track the handling of environmental complaints and the management of the Lac-Saint-Jean riverbanks (related to RTA hydroelectric facilities). - First Nations affected by the Lac-Saint-Jean project participated actively in the Authorisation renewal consultation. <p>For the province of British-Colombia (BC):</p> <ul style="list-style-type: none"> - BC Works received complaints or requests through e-mails, phone calls, Facebook. - Complaints are usually addressed right away and all actions have been closed. - A new system was 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. - Analytics are included in this system, which are shared with stakeholders and Kitimat Public Advisory Committee (KPAC) - KPAC and the Community Office advise regularly about the means for the communities to provide questions, comments or concerns to BC Works. - Training was provided in 2018 to all communication team members about the differences regarding incidents, complaints, disputes and grievances and how to deal with them. - 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.
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"> - An environmental Life Cycle Assessment (LCA) of aluminium ingot produced by Rio Tinto Alcan was conducted in 2014 (study undertaken by an internationally renowned firm in LCA) "Screening Life Cycle Assessment of Pechiney Aluminium technologies".

CRITERION	RATING	COMMENT
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	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: <ul style="list-style-type: none"> - An interactive Excel matrix presenting RTA lifecycle was provided to the BNQ. RTA provide Carbon Footprint data to the Canadian Aluminium Association (AAC) and collaborates with the Intergovernmental Panel on Climate Change (IPCC) and the International Aluminium Institute (IAI) about it.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	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: <ul style="list-style-type: none"> - 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 Aluminium - North America and Europe, 2013. The summary has been provided upon request to the BNQ and presents the system's boundaries, data sources and corresponding assumptions.
4.2 Product design	Not Applicable	This Criterion is no longer applicable in the Certification Scope as product design is now completely realised by specific clients.
4.3a Aluminium Process Scrap (targets)	Conformance	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: <ul style="list-style-type: none"> - Planning and implementation of optimised Aluminium residues reuse is performed, followed and integrated centrally for all RTA-Atlantic production sites at the Aluminium Operations Centre. - Minimum (safety stock) and maximum aluminium residues inventory targets for each production site are set, monitored, and reviewed periodically based on the established metallurgist requirement and reuse capacity requirements. - The casthouses are ISO 9001:2015 certified. - The RTA Control Tower helps optimize scrap recycling for the overall Entities in Canada.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has an aluminium recycling strategy. Based on the provided objective evidence, we conclude to the implementation of the following elements: <ul style="list-style-type: none"> - All aluminium alloys scrap are separated and recycled by family and grade based on the production needs planned by the metallurgists at each production site. - The RTA Control Tower helps optimize scrap recycling for the overall Entity in Canada.
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	The Entity has an aluminium recycling strategy. The Criterion does not directly apply to the Entity Products: <ul style="list-style-type: none"> - All primary aluminium is internally recycled when not transferred to the next transformation step.

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - All Aluminium sold by the remelting/ refining or semi-fabrication facilities is pre-consumer scrap and is 100% recyclable in these facilities. - The Entity does not sell aluminium products for end uses but to material conversion or other manufacturing facilities that produce end use products. - 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.
4.4b Collection and recycling of Products at end-of-life (engagement)	Conformance	<p>The Entity has an aluminium 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"> - RTA presented examples of achievement to promote the recycling of aluminium in communities, made by the Aluminium Association of Canada (AAC). It is the AAC that is mandated by RTA (and the other aluminium producers in Québec) to carry out this type of mission and activity, which does not directly concern RTA's operations. <p>Some initiatives undertaken by the AAC on the subject:</p> <ul style="list-style-type: none"> - Co-founder of the Québec Pole in Circular Economy - works with the Sustainability, Environment and Circular Economy Institute (EDDEC). - 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 - 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 Québec - Members of the residual materials management committee of the Provincial Minister of Environment - Participation in the gathering table of recovery out of home which aims among others the recovery of containers in public spaces
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>Globally, Rio Tinto publishes its global greenhouse gas (GHG) emissions on its website in their annual Climate Change Report. The following hyperlink presents the results of 2019 for the metal and mineral produced including alumina and aluminium: https://www.riotinto.com/sustainability/sustainability-reporting</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 aluminium smelters and their sources have been disclosed publicly in the 2019 Provincial Sustainability Report. The following link presents the 2019 results (content available only in French): https://console.virtualpaper.com/le-lingot-autres/rapport-de-developpement-durable-pour-le-quebec-2019/</p>

CRITERION	RATING	COMMENT
		<p>Province of British-Colombia (BC): BC Works accounts for and publicly discloses material GHG emissions and energy use by source on an annual basis through the 2019 BC Works Environmental Performance Report. Chapter 5 covers the global emissions of the plant including the GHG: https://www.riotinto.com/operations/canada/bc-works</p>
5.2 GHG emissions reductions	Minor Non-Conformance	<p>Globally, Rio Tinto has made public its greenhouse gas reduction targets for 2030 and 2050 in its 2019 Climate Change Report. The company will track its performances against those targets annually in its Climate Change Report. Rio Tinto Aluminium contributes to 70% of the emissions of Rio Tinto and will therefore be a major participant in these reductions.</p> <p>Province of Québec: The Entity published its consolidated time-bound GHG emissions reduction targets for the Province of Québec (Canada) in the 2019 Provincial Sustainability Report through the following hyperlink (content available only in French): https://console.virtualpaper.com/le-lingot-autres/rapport-de-developpement-durable-pour-le-quebec-2019/</p> <p>Province of British Columbia (BC): 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 CO₂ eq. target was published in 2013 as Post-KMP targets that was met and even surpassed in 2017 (after a completed ramp-up). Since 2018, and up to now, there is no public evidence available to demonstrate the specific and time bound effort of Kitimat smelter in Rio Tinto's emissions reduction targets following the post ramp-up of the site. A corrective action plan is currently in implementation at the corporative level of Rio Tinto and is targeting time-bound GHG reduction targets for all Rio Tinto facilities in the upcoming years. However, a specific time-bound GHG reduction target has not yet been published for the Kitimat Smelter consistently to corporative targets. A few additional months of data studies will be required to reach and publish an adequate target.</p>
5.3a Aluminium Smelting (Management System)	Conformance	<p>The Entity's direct GHG emissions are annually verified under the Québec and British-Columbia regulations. GHG emissions are lower than 8 tonnes of CO₂ eq. Based on interviews and evidences observed, this Criterion is met. The Entity deploys the following processes:</p> <ul style="list-style-type: none"> - 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 - Process controls to reduce net carbon consumption (anodes and cathodes) are optimized continuously

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - Direct GHG emissions are annually verified under the Québec and British Columbia regulations by an ISO 14065 accredited verification body - Verification reports on the 2019 direct emissions of aluminium smelters were obtained and reviewed to the satisfaction of the BNQ
5.3b Aluminium Smelting (up to and including 2020)	Conformance	<p>The Entity's direct GHG emissions are annually verified under the Québec and British Columbia regulations. Based on interviews and evidences observed, this Criterion is met. The Entity deploys the following processes:</p> <ul style="list-style-type: none"> - Scope 1 and Scope 2 GHG emissions from the Entity's aluminium smelters are below 8 tonnes CO₂-eq per metric tonne aluminium. - External audits reports make it possible to do this demonstration. - Québec and BC Works uses hydroelectricity which is very sober in greenhouse gas emissions.
5.3c Aluminium Smelting (after 2020)	Conformance	This Criterion was not relevant at the time of the audit as there are no new facilities to commence operation after 2020.
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"> - RTA holds 5 provincial environmental permits which detail the air emissions of all smelters. - Each site maintains a daily/monthly database, to measure and report air emissions. - This is supported by an exhaustive and regulatory monitoring program. - Detailed calendars for sampling and monitoring programs are prepared annually. - Monthly performance is reported to the Québec Ministry of Environment for the Depollution Attestations purposes. - Capex projects and actions plans are prepared and implemented to reduce air emissions, mostly particulates, at different sites. - A summary of air emissions is included in the Annual Report on Sustainable Development. <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - RTA Kitimat Smelter and Kemano Hydropower facilities (together known as BC Works) produce many air emissions reporting through the Provincial Pollution Prevention Multimedia Environmental Permit (P2 Permit) that allows them to operate. - Reporting is mandatory to keep this right to operate. All reporting on air emissions are based on the Permit. - All official air emission surveys are performed by external specialized firms.

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - Lots of energy is spent to improve stats that are already better than targeted by the authorities. - All air emission is publicly disclosed in the Annual Report. - 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. - Most air emissions have decreased with the implementation and ramp-up of the new Kitimat Smelter except for Sulphur Dioxide (SO₂). A specific and exhaustive SO₂ environmental monitoring plan is implemented and the monitoring results are reported, amongst others.
6.2 Discharges to Water	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements: The Entity is ISO 14001 certified and carries out environment, health and safety (EHS) legal/ regulatory compliance monitoring for this Criterion.</p> <p>Province of Québec:</p> <ul style="list-style-type: none"> - Discharges to Water are defined through the Depollution Attestation (concentration limits, sampling frequency, methodology, etc.). - Daily, weekly and monthly effluent samples provide a very complete and efficient monitoring program. The results are communicated monthly to the government. - Projects and action plans are performed to reduce effluents or contamination at different sites. - The annual provincial Report on Sustainable Development includes a section on the water consumption by smelters (m³/ ton of aluminium) and total particulate matters discharged (in kg). <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - RTA Kitimat-Kemano plants produce many water discharge reporting through the Provincial "P2 Permit" that allows them to operate. - Reporting is mandatory to keep this right to operate. All reporting on water discharge are based on the Permit. - There is only one effluent discharge to the ocean where water of all plant watershed is concentrated in a final contained lagoon and is settled before final discharge to the ocean. - By the Permit, BC Works produces and transmits to the Authorities monthly reporting on discharged water parameters measurements.
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: The Entity has an exhaustive spill and leakage action plan in place.</p> <ul style="list-style-type: none"> - Scenarios of spills have been assessed and evaluated throughout the sites. - This is undertaken with the new Risk Management tool. - Sites use separated files to manage locally, with critical checklists and specific controls.

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - Exhaustive action plan and corrective actions have been put in place. - Training and awareness on spill prevention have been integrated in training materials for all employees and contractors.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements: The Entity has an exhaustive spill and leakage action plan in place:</p> <ul style="list-style-type: none"> - Communication plan and procedures are in place to manage spill, from site level to the regional level. - For significant spills, the information is raised up to Rio Tinto HSE Group. - Since 2010, the Zero-Spill Objective has released projects and initiatives to prevent, mitigate or reduce the spills at different sites. - All spills are reported internally and investigated to identify and implement relevant corrective actions.
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"> - For any significant spill, a close follow-up is undertaken internally and by the Québec government inspectors. - Spills and environmental incidents are investigated, documented in the Rio Tinto Business Solution (RTBS) and corrective actions are taken. - The impacts and the actions are recorded on the spill report. - Any concerned external party is informed and advised of the impacts and actions taken. - If any significant spill had occurs in 2019, it would have been publish in the annual provincial Sustainability Report (content available only in French): https://console.virtualpaper.com/le-lingot-autres/rapport-de-developpement-durable-pour-le-quebec-2019/#2/ <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - By the P2 Permit, declaring any spill to the authorities is mandatory. - RTA publicly discloses number of spills, notice of violations, prosecutions and number of penalties in its Annual Environmental Report for BC Works. - Annual Environmental Report for BC Works states the spills occurred during the previous year. The Report is available on RTA website (see Chapter 11 in the 2019 version): https://www.riotinto.com/-/media/Content/Documents/Operations/BC-Works/RT-BC-Works-Environmental-report-2019.pdf
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>

CRITERION	RATING	COMMENT
		<p>- RTA publicly discloses number of spills, notice of violations, prosecutions and amount of penalties in its annual 2019 provincial Sustainability Report (content available only in French): https://console.virtualpaper.com/le-lingot-autres/rapport-de-developpement-durable-pour-le-quebec-2019/#2/</p> <p>- Partial information on significant spills can also be found on the Provincial Ministry of Environment (MELCC) website. For 2019 and 2020, there was no information to disclose publicly on the spills and remediation actions. A formal process has been put in place to review all relevant information included in the annual Report on Sustainable Development, and would include adverse spills, if this happens.</p> <p>Province of British-Columbia (BC):</p> <p>- By the P2 Permit, declaring any spill to the authorities is mandatory.</p> <p>- RTA publicly discloses number of spills, notice of violations, prosecutions and number of penalties in its Annual Environmental Report for BC Works.</p> <p>- Annual Environmental Report for BC Works states the spills occurred during the previous year. The Report is available on RTA website (see Chapter 11 in this 2019 version): https://www.riotinto.com/-/media/Content/Documents/Operations/BC-Works/RT-BC-Works-Environmental-report-2019.pdf</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements: The Entity has developed and implemented policies, systems, procedures and processes that conform to these waste management and reporting requirements.</p> <p>- Hazardous and non-hazardous wastes have been characterized, classified and are managed based on priority to prevention, reduction, re-use, recycling and disposal.</p> <p>- Action plans to increase the reduction/ recovery/ recycling and reduce the disposal are in place and tracked, with targets, economic gains and timeframe.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>Globally, Rio Tinto publishes annually a global Sustainable Development Report: https://www.riotinto.com/sustainability/sustainability-reporting</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 publishes information on the volume of hazardous and non-hazardous wastes, the treatment method and their improvement/reduction in the 2019 provincial Sustainability Report (content available only in French): https://console.virtualpaper.com/le-lingot-autres/rapport-de-developpement-durable-pour-le-quebec-2019/#2/</p>

CRITERION	RATING	COMMENT
		<p>Province of British-Columbia (BC):</p> <p>The Entity reports on waste management in its Annual Sustainability Report.</p> <p>Waste management is reported (summarized) in the 2019 Annual BC Works Environmental Report (see Chapter 8 for waste management):</p> <p>https://www.riotinto.com/-/media/Content/Documents/Operations/BC-Works/RT-BC-Works-Environmental-report-2019.pdf</p>
6.6a Bauxite Residue (storage construction)	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements:</p> <ul style="list-style-type: none"> - Contaminated discharge waters from the bauxite residues disposal site are all reintroduced into the manufacturing process as wash water, and in other process steps.
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"> - Regular inspections are carried out internally and by specialized external firms to ensure the integrity of the bauxite residue disposal sites.
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"> - Contaminated discharge waters from the bauxite residues disposal site are all reintroduced into the manufacturing process as wash water, and in other process steps.
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"> - Contaminated discharge waters from the bauxite residues disposal site are all reintroduced into the manufacturing process as wash water, and in other process steps.
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"> - A new filtration plant for bauxite residue is in operation. - Environmental certificates required by governmental authorities are obtained.
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"> - The disposal site for bauxite residues is currently in operation. - Plans are in place for rehabilitation of the site when it closes. - Environmental risks are considered in the rehabilitation plan.
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>

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - Closed and identified warehouses are exclusively used for the storage of Spent Pot Lining (SPL) prior to processing. - Periodic inventories of the contents of each warehouse are made and up-to-date reports are available. - 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. - The treatment plan for all inventories is several years ahead of the zeroing schedule on the storage permit. <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - SPL produced at BC Works is sent to the UTB plant in Saguenay (Québec), 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. - Prior to 1989, untreated SPL was landfilled on-site. The site is now closed and extensive groundwater monitoring is deployed monthly. - The P2 multimedia permit limits are monitored and reported in the BC Works Environmental Annual Report.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	Based on the provided objective evidence, we conclude to the implementation of the following elements: All carbon and refractory material generated are processed at the SPL processing plant (UTB).
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"> - 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. <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - SPL produced at BC Works is sent to the UTB plant in Saguenay (Québec), which is a specialized SPL treatment Plant.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	Based on the provided objective evidence, we conclude to the implementation of the following elements: The SPL and dross treatment process is reviewed annually, and research projects are underway at the Aluminium Research and Development Centre (CRDA) to continually improve the performance of the process.
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"> - 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.

CRITERION	RATING	COMMENT
		<p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - SPL produced at BC Works is sent to the UTB plant in Saguenay (Québec), 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.
6.8a Dross (recovery)	Conformance	<p>Dross management is undertaken at a 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> <ul style="list-style-type: none"> - All dross generated by the production centres is processed by a specialized external company. - All metal (aluminium and alloys) is internally recovered.
6.8b Dross (recycling)	Conformance	<p>Dross management is undertaken at a 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"> - All dross generated by the electrolysis process of all production units are treated. - 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 is made. - 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
6.8c Dross (review of alternatives)	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements: The treatment process for Spent Pot Lining is reviewed annually and research projects are underway at the Aluminium Research and Development Centre (CRDA) to continually improve the performance of the process.</p>
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 British-Columbia, 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 is tracked annually on Social and Environmental (S&E) Survey at Rio Tinto level. A summary of a water mass balance is elaborated.</p>

CRITERION	RATING	COMMENT
		<p>Province of Québec:</p> <ul style="list-style-type: none"> - RTA Québec Power Operations did numerous studies to identify the water uses, intakes, withdraws of Lac St-Jean and its basin. - The management of the lake levels is undertaken in accordance with the requirements of a provincial decree. <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - The Nechako Reservoir for the Kemano Power Operation is also closely monitored, mapped, and managed. - The Nechako Reservoir Management Plan summary is published. - The Hydrology Team of the RTA Québec Power Operation also supports the Kemano Power Operation for the Nechako Reservoir level monitoring management. - The Kemano and watershed water balance is documented and monitored.
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"> - Extensive studies have been performed over the last 20 years on RTA impacts over the Lac St-Jean. - 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. - As part of the decree, RTA commits to reduce the bank erosion, in one sensitive area of Lac St-Jean. The Belle-Riviere project was completed in 2019 and a follow-up report was issued. Report will continue for the coming years. - 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 - The water-related risks are also addressed at the plant level of the Entity. <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - There is a Nechako Reservoir Dam Emergency Plan in case of dam overflow/failure. - The Kemano and watershed water balance and level is documented and monitored. - Local operators help mitigate flood risks in time of water surplus to ensure public safety with the help of the Hydrology Team of the Québec Power Operation. - The area of influence of the Nechako Reservoir and the watershed are mapped in detail. - The water-related risks are also addressed at the Kitimat smelter level.

CRITERION	RATING	COMMENT
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"> - A water management plan is in place and regularly monitored for the Lac St-Jean reservoir. - The water management plan is updated periodically by Québec 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 Criterion 7.1. - 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. <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - Water management plans are updated periodically. - 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. - Material elements and monitoring results of the Watershed Management Plan are available on RTA's website. - A Water Management Plan is in place and applied for the entire Kitimat smelter site.
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"> - The Dams Emergency Plans effectiveness are monitored throughout water surplus period and through drills. - The Reservoirs and Watersheds Monitoring Plans are continuously monitored through systems and diagnostic/expertise from Québec Hydrology Team to help optimise effectiveness. - Material elements and monitoring results of the Watershed Management Plans are available. - For the smelters, the alumina refinery and the other facilities, regular periodic monitoring of groundwater and surface water quality are performed and reports are undertaken internally and externally at specified frequencies and adjustments are made continuously to ensure that the water returned to environment meets the required specifications (most of the time required in a Depollution Attestation in Québec or in the P2 Multimedia Permit in BC).
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 (websites are available only in French):</p> <ul style="list-style-type: none"> - The stabilisation of the bank of Lac St-Jean: https://energie.riotinto.com/donnees/fichiers/Actualite/2020/Rapport%20de%20suivi%202019.pdf and hydrological management are reported: https://energie.riotinto.com/index.php?id=1

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - All documents related to Lac St-Jean Stabilisation program (impacts assessments, consultation, decree...) are available on the provincial Ministry of Environment website. - Summaries of projects and reports are also available at: https://www.lelingot.com/ - 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 at https://energie.riotinto.com/ <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - Annual BC Works Environmental Reports disclose water usage, effluent monitoring results and related risks. - The Nechako Reservoir and Watershed Management Plan is disclosed, amongst others, in the "RT-Reservoir 101" presentation. - The Water Engagement Initiative (WEI) of BC Works helps inform stakeholders about the Reservoir/ Watershed material risks and maintain dialogue to receive requests/grievances. - Material element and monitoring results of the Watershed Management Plan are available on RTA's website: https://www.riotinto.com/canada/bc-works-4818.aspx
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"> - In 2009, risk assessments have been conducted on RTA properties to identify impacts on biodiversity (Management Plan Environmental properties). - Since 2009, potential impacts from major changes are captured as part of project assessment and risk evaluation. - RTA uses the "5x5" Risk Matrix to evaluate each risk. - 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. <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - Exhaustive biodiversity risk assessments have been realised by BC Works for the Kemano Power operations in 2011 and for the smelter facilities in 2015 with the help of a specialised consultant firm. - 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. - The two (2) BAPs are covering BC Works area of influence.
8.2a Biodiversity management	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements:</p>

CRITERION	RATING	COMMENT
(Biodiversity Action Plans)		<p>Province of Québec:</p> <ul style="list-style-type: none"> - RTA Power has developed a specific Workbook detailing the inventory of flora and fauna, with a risk assessment and action plan to address biodiversity risks in the areas of Québec Power Operation's Facilities (dams, Lac St-Jean, reservoirs, electrical lines, etc.). - Actions have been implemented and the plan is revised, when a trigger is raised (eg: additional information, external request, project, legal requirements, etc...). - A vegetation study is conducted every 3 years, by an external firm, in RTA properties to assess the state and condition of the flora. <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - The Kitimat and Kemano Biodiversity plans address material impacts, have time-bound targets, and are monitored for effectiveness. - More specifically, the reservoir and the Kemano Operations affect the Nechako River which is a regulated salmon river. The Nechako Fisheries Conservation Program (NFCP) is jointly monitored with Rio Tinto, Fisheries and Ocean Canada and, BC Ministry of Environment.
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> <p>Province of Québec:</p> <ul style="list-style-type: none"> - 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. <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - 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. - For the Kitimat Smelter BAP, most of the consultation with local communities/stakeholders are realised with the Kitimat Public Advisory Committee (KPAC). - For the Kemano Power Operation and the management of the Nechako Reservoir, regular meetings were realised in the recent past with multiple groups of stakeholders. - More recently, Rio Tinto implemented a focussed Water Engagement Initiative (WEI) to group together most of the Nechako Watershed communities to exchange interests, needs and advice between stakeholders and facilitate dialogue. The WEI may help identify measures that BC Works can implement voluntarily to enhance operations (including to enhance BAP).

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements: The Entity's biodiversity management outcomes are shared.</p> <p>Province of Québec (websites are available only in French):</p> <ul style="list-style-type: none"> - The results of the Lac St-Jean stabilisation program were regularly published. Regular progress and achievements are also posted on the RTA website: https://energie.riotinto.com/ - The communication bulletin "Le Lingot" includes information regarding the protection of biodiversity and projects or initiatives on-going - Periodic fact sheets on the stabilization project are also posted. - 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 Québec Power Operation website at: https://energie.riotinto.com/ <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - The achieved BAPs outcomes are published through the annual Sustainability Reports and progress also posted on the website: https://www.riotinto.com/canada/bc-works-4818.aspx - 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.
8.3 Alien Species	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements: The Entity's 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> <ul style="list-style-type: none"> - The prevention of alien species is strictly regulated under Transport Canada regulations, on which RTA complies. - 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. A sample of these ships confirms the Transport Canada approval. - In addition, during the months of April to November, ships coming from Asia-Pacific require a certificate for the Asian Gypsy Moth (AGM), delivered by Canadian Food Inspection Agency (CIAF). - International domestic garbage are secured in specific plastic bags and picked-up by "Urgence Maritime" (a specialised firm), for safe disposal in a Saint-Bruno waste disposal site. - RTA requires that ships have anti rat guard system, with metal disc, to prevent rat intrusion on a ship moored in port. <p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - Since the regulation on alien species is federal, the Kitimat Port Facility managers apply the same processes as in Quebec. Other

CRITERION	RATING	COMMENT
		<p>examples of sample ships also help demonstrate that they had their AGM certificates.</p> <ul style="list-style-type: none"> - 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.
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: Policies, guidance and ethics codes that include commitments to respect human rights are available, integrated and implemented through the Entity’s activities (See also 2.1). These documents include, amongst others, the following:</p> <ul style="list-style-type: none"> - A Human Rights Policy*. - An Employment Policy*. - An Inclusion and Diversity Policy* - The why human rights matter guidance*. - The Way We Work Code of Ethics*. <p>(* information publicly available at https://www.riotinto.com)</p>
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"> - 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).
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"> - 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.

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - The Business Conduct Office is responsible for managing the confidential reporting program and responding to complaints or concerns regarding compliance with human rights policies. - A confidential reporting program* is available to all employees, contractors, suppliers, clients and community members and actions are planned to fill gaps. - Problems (if any), action plans and progress monitoring is undertaken by senior management. <p>(* information publicly available at https://www.riotinto.com)</p>
9.2 Women's Rights	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements:</p> <p>A due diligence process for women's rights is set out in the Rio Tinto policies and guidance and is based on risk management (low risk in Canada). This process ensures that:</p> <ul style="list-style-type: none"> - Women are not underrepresented in decision-making roles. - Pay equity is met. - All incidents are investigated where women have been the target of physical and sexual abuse. - The Business Conduct Office is responsible for managing the confidential reporting program and responding to complaints or concerns regarding compliance with human rights policies. - A confidential reporting program* is available to all employees, contractors, suppliers, clients and community members and actions are planned to fill gaps. - Problems (if any), action plans and progress monitoring is undertaken by senior management. <p>(* information publicly available at https://www.riotinto.com)</p>
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): RT globally 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: All the Entity's Area of influence in Québec is included in the larger territory of the Nitassinan, the traditional territory of the Pekuakamiulnuatsh, the Innu (Inuatsh) First Nation community of the village of Mashteuiatsh located on the shores of the Lac-St-Jean (St-Jean Lake, Pekuakami). 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</p>

CRITERION	RATING	COMMENT
		<p>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"> - 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; - Another elected official from Pekuakamiulnuatsh Takuhikan is an official member of the Council; - 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; - Pekuakamiulnuatsh Takuhikan is also represented on the Stakeholders Committee, the Scientific Committee and the Technical Committee that all support the Council. <p>The Council was established to foster an informed public participation. It is a participatory management model which is independently managed from the Entity. The Entity recognised and salute the contribution and expertise from Pekuakamiulnuatsh Takuhikan for the renewal of the Decree.</p> <p>Province of British-Columbia (BC): 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. 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. As an example, the Kitimat 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. (* information publicly available at https://www.riotinto.com)</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 the Free, Prior and Informed Consent requirements.</p> <p>Province of Québec: RTA's footprint on Quebec's territory has not changed significantly in decades. Any project or works are the subject of consultation, accommodation and assent, i.e. a declaration of non-opposition from Pekuakamiulnuatsh Takuhikan. 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.</p> <p>Province of British-Columbia (BC):</p>

CRITERION	RATING	COMMENT
		<p>In BC, communications between First Nations and Rio Tinto is ongoing. The process is in constant evolution and improvement. The “Kemano T2 Project” (the completion of the Power Operation’s 2nd tunnel) has been the object of vast permitting process through various provincial agencies that included, amongst others, an extensive consultation with concerned First Nations of the Watershed. The Cheslatta Carrier Nation and the Haisla Nation are participating in the Kemano T2 project with the Entity, ensuring that their cultures and traditions are respected as the construction of the project and associated facilities have been undertaken in 2018. 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 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>
9.5 Cultural and sacred heritage	Conformance	<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 considering 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 has deployed archaeological 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.</p> <p>The Pekuakamiulnuatsh’s cultural and sacred heritage sites, identified through the new or updated archaeological research, are</p>

CRITERION	RATING	COMMENT
		<p>georeferenced and mapped and the resulting maps are cooperatively shared with Pekuakamiulnuatsh Takuhikan and their rights and protection of the territory department.</p> <p>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.</p> <p>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 British-Columbia (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>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Community and Social Performance (CSP) Standard* of the Entity consider any feasible alternatives to avoid or minimise displacement during project or regular activities.</p> <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 in decades.</p> <p>Province of British-Columbia (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 was signed with RTA and the Cheslatta Carrier Nation in February 2020.</p> <p>(* information publicly available at https://www.riotinto.com)</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>The Community and Social Performance (CSP) Standard* of the Entity states criteria and requirements when displacement is unavoidable during project or regular activities.</p> <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 in decades.</p>

CRITERION	RATING	COMMENT
		<p>No physical or economical displacement occurs in the Certification Scope. No Resettlements was required in the Certification Scope for the PekuakamiInuatsh,</p> <p>Province of British-Columbia (BC): The Kemano T2 Project will not significantly modify RTA footprint in BC. Consultation with concerned stakeholders were made through the permitting process. All feasible means/ alternatives have been considered to avoid and minimise physical/ economical displacement while balancing environmental, social and financial costs and benefits. According to the project summary presentation document, the Haisla Nation and Cheslatta Carrier Nation are participating with Rio Tinto on the project, including ensuring their cultures and traditions are respected as Rio Tinto undertakes construction of the project.</p> <p>More generally, the recent BC Works major projects, the Kitimat Modernisation Plan (KMP: 2012-2015) and The Kemano T2 Project (2018-2020) did not involve physical displacements as they did not significantly modify RTA footprint in BC. A Resettlement Action Plan, according to the applicable requirements of IFC Performance Standard 5, has not been required yet. (* information publicly available at https://www.riotinto.com)</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 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: The Entity is maintaining Good Neighbourhood Committees for its main facilities to exchange information, opinions and develop opportunities to respect and support their livelihoods with a constructive approach.</p> <p>The Entity also participate in the Counsel for Sustainable Management of the Lake to assess and address any impacts of its power generation operations.</p> <p>The Vaudreuil Beyond (VB) 2022 Impact Assessment processes demonstrate how public consultation was deployed, how concerned local community will be treated in this project and the corresponding Entity's engagement.</p> <p>Province of British-Columbia (BC): 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 stakeholder of the Nechako Watershed/ Reservoir (Kemano Power Operations) to communicate and monitor complaints, grievances and requests for information.</p>

CRITERION	RATING	COMMENT
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 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: The Entity is maintaining Good Neighbourhood Committees for its main facilities to exchange information, opinions and develop opportunities to respect and support their livelihoods with a constructive approach. The Entity also participate in the Counsel for Sustainable Management of the Lake to assess and address any impacts of its power generation operations.</p> <p>The Vaudreuil Beyond (VB) 2022 Impact Assessment processes demonstrate how public consultation was deployed, how concerned local community will be treated in this project and the corresponding Entity's engagement.</p> <p>Province of British-Columbia (BC): 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>The Kitimat Public Advisory Committee (KPAC) consists of 18 + members from community organizations. 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>
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.</p> <p>The Entity deploys 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: The Entity is maintaining Good Neighbourhood Committees for its main facilities to exchange information, opinions and develop opportunities to respect and support their livelihoods with a constructive approach. A website is in place to ensure information communication, transparency and feedback from and to</p>

CRITERION	RATING	COMMENT
		<p>stakeholders. The Entity also participate in the Counsel for Sustainable Management of the Lake to assess and address any impacts of its power generation operations.</p> <p>The Vaudreuil Beyond (VB) 2022 Impact Assessment processes demonstrate how public consultation was deployed, how concerned local community will be treated in this project and the corresponding Entity's Engagement.</p> <p>Province of British-Columbia (BC): A new website has been implemented in 2018 to communicate with stakeholders. This communication tool tracks requests and exchanges with the local community. Mechanisms were in place to have the communities involved in flood mitigation & water management considerations.</p> <p>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.</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>
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> <ul style="list-style-type: none"> - A robust Security and Human Rights Program is in place, supported by Group Security Standards. Rio Tinto Security Standard requires a security risk assessment and a management plan for each location. The risk assessment covers over 40 different risks and are reviewed annually. - Canada is classified as a Low-Risk Country Class 1. There is no conflict or high-risk areas. - The classification is reviewed annually, or when serious national incidents occur. No security incidents in RTA over the last few years.
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"> - Rio Tinto Security & Human Rights and Security Risk Analysis & Management are the main guidance documents, on which RTA sites follow. - Canada has been assessed as a Low Risk country. - There are no armed personnel on RTA sites. - Security management and supervisory staff have been trained in 2017 on Rio Tinto Risk Management Plan and all security guards have been scheduled for training on this specific plan.

CRITERION	RATING	COMMENT
		<p>Province of British-Columbia (BC):</p> <ul style="list-style-type: none"> - Canada has been assessed as a Low Risk country. - The site has an unarmed security team. Only safety firearms are used against wildlife and predators, if required. - All guards have been trained and continuous training is on-going.
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"> - Rights of association and Workers are supported by Rio Tinto Policies and the legislation in Canada. - Unions or Workers can organise in council without interference by the employer. - Activities that may interfere with Freedom of Association and the right to bargain collectively are covered by laws, regulations and Collective Agreements. - Unions are established or supported to ensure legitimate representation of workers. - There is evidence that there is no interference to union or organizing efforts.
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"> - Rights of association and Workers are supported by Rio Tinto Policies and the legislation. - 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. - Once a Collective Agreement is concluded, there is evidence that it is implemented in the company. - Concluded Collective Agreements are implemented by the Entity.
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"> - Rights of association and Workers are supported by the Rio Tinto Policies, Codes of Ethics and the Canadian legislation.
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"> - Rio Tinto Policies are in place to avoid children under 15 years old being hired by the company. - Children's rights are supported by legislation in Canada - A Supplier Code is applied for the Subcontractors and also covers the minimum age of their employees.
10.2b Child Labour (hazardous)	Conformance	<p>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"> - In the context of hazardous work, the minimum age is considered to be 18 years old (according to Rio Tinto Policies). - Unsafe work is usually determined under applicable laws. - Hazardous work prevention and mitigation are covered in Principle 11 of this report.
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 Business Conduct Office is responsible for managing the confidential reporting program and responding to complaints or concerns regarding compliance with child labour policies and laws. This confidential reporting program* is available to all employees, contractors, suppliers, clients and community members. Action plans mechanisms to fill gaps (if any) would be put in place. (* information publicly available at https://www.riotinto.com)</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>Rio Tinto Policies*, Codes of Ethics* and laws are in place to avoid human trafficking that can lead to forced labour, and that, in any of its forms, at the level of the company (including the Entity) and its Subcontractors. (* information publicly available at https://www.riotinto.com)</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>Rio Tinto Policies* and local regulations are in place to avoid any form of deposit or recruitment fees through employment or recruitment. Prohibitions related to forced labour are supported by numerous legislations. (* information publicly available at https://www.riotinto.com)</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>Rio Tinto Policies* and local regulations are in place to avoid any form of deposit or guarantee payments from migrant workers. Prohibitions related to migrant workers are supported by numerous legislations. (* information publicly available at https://www.riotinto.com)</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>Rio Tinto Policies* and local regulations are in place to avoid that workers are held in debt bondage to pay off a debt. Prohibitions related to hold workers are supported by numerous legislations. (* information publicly available at https://www.riotinto.com)</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 (OHS) special precaution or training is required.</p> <p>Other than for OHS risks prevention or mitigation, Rio Tinto 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>Rio Tinto 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>Rio Tinto 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> <p>(* information publicly available at https://www.riotinto.com)</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"> - Rio Tinto Policies* are communicated internally to all workers (awareness session, intranet site, website, posting, etc.). - Senior management ensures that staff are aware of Non-Discrimination Policies. - Staff are aware of company policies* that are directly related to their position. - Awareness and reinforcement help employees to integrate policies into their work and procedures. - Policies* are available to external stakeholders to raise awareness of company commitments (website, posting, etc.) - 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). <p>(* information publicly available at https://www.riotinto.com)</p>
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"> - 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.

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - These communication channels operate without threat of reprisal, intimidation or harassment for participation or problem identification (e.g. Talk to Peggy, Yammer, etc.) <p>See also the findings for the following criteria:</p> <ul style="list-style-type: none"> - 10.1 on freedom of association and the right to collective bargaining - 11.3 Employee engagement in health and safety.
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"> - Rio Tinto Policies* and local regulations are in place to avoid unreasonable practices in the workplace to apply disciplinary measures. - Supervisors and subcontractors are trained in the proper management of any disciplinary matter. - 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. - 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. - Grievance procedures and resolution mechanism are a means for employees to raise concerns about management practices or disciplinary decisions. - There are processes in place to allow Workers to report unfair treatment to someone other than their supervisor. (See also 10.5). (* information publicly available at https://www.riotinto.com)
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"> - There are several policies, processes and procedures that are supporting the wages and benefits. - 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. - Workers receive higher wages for work beyond normal. The rate of these hours is fixed by contract or collective agreement. - 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.
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"> - Workers receive their wages regularly as stipulated in their employment contracts by bank wire transfer. - The correct rate is paid for regular hours and overtime worked at night, weekly rest days and statutory holidays. - Payments are made regularly directly to the workers, in accordance with the legislation in force. Policies and local

CRITERION	RATING	COMMENT
		<p>regulations are in place to avoid that payments are delayed, deferred or withheld.</p> <ul style="list-style-type: none"> - Only deductions authorized by national and provincial legislation are allowed and when they are completed, actions are taken with the full consent and understanding of Workers. - 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. - 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 part of Workers' wages. - Any amount deducted from the salary is determined according to a regular procedure. Legitimate deductions include income taxes, pension contributions, union membership, etc. - Workers are informed of the conditions and extent of all deductions made in their pay slip.
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"> - There are several applicable laws relating to working time. - Collective Agreements deal with hours of work, overtime, breaks and holidays. - Applicable laws and conventions provide processes to ensure Workers are not forced to work beyond the hours allowed. - Overtime is voluntary unless it is part of a legally recognized Collective Agreement. Workers are not forced to work overtime under threat or dismissal. - Timesheets are used to record the number of hours worked by each worker and to track overtime and leave.
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"> - Rio Tinto (RT) has released Health, Safety, Environment (HSE) and Communities (HSEC) Policy* which applies to all Rio Tinto locations. - The Policy*, has been presented to all employees and is part of the HSE induction for new employees and refresher for others. <p>(* information publicly available at https://www.riotinto.com)</p>
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"> - The principles of the HSEC Policy are explained in a document "The Way We Work"*, which is read and reviewed annually by all Rio Tinto staff. - The HSEC Policy* is posted in different areas of the sites and on the intranet. - The HSEC Policy* is presented to the visitors and the contractors. <p>(* information publicly available at https://www.riotinto.com)</p>

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and Standards)	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements:</p> <p>The Rio Tinto HSEC Policy* includes a commitment to the prevention of injuries and illnesses, compliance with legal requirements and beyond, achieving world class performance, thus creating a strong safety culture. Legal watch and regulatory monitoring and verification are implemented. Please also see Criterion 1.1 about legal compliance.</p> <p>(* information publicly available at https://www.riotinto.com)</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 Rio Tinto HSEC Policy* does refer to the right of Workers to understand the hazards and the safe practices for their work, and also includes the duty to refuse or stop any unsafe work. HSE risk prevention and mitigation are regularly monitored and communicated and Workers are invited to share any inputs that may help continuous improvements.</p> <p>(* information publicly available at https://www.riotinto.com)</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"> - Rio Tinto HSEC Management System* is fully implemented at all RTA sites. - The HSEC Management System* includes 17 elements, aligned with the OHSAS 18001 standard requirements. - Risks are evaluated at three (3) levels, with a Critical Risk Management (CRM) Program, to manage and control critical risk. - Legal obligations are defined and verified, through compliance audits. A five (5) year calendar has been implemented to cover all facilities and all obligations. - OHS objectives, targets and action plans are prepared yearly, implemented and monitored to track the achievement. - The management system is regularly audited and the findings and results are presented at the annual management review. <p>Over the years, the following observations have been made during the BNQ audit tours and Lean Management meetings (onsite in 2018 and 2019 and videoconference in 2020):</p> <ul style="list-style-type: none"> - The OHS Management System is well implemented at the level of production operations in each sector of a given plant. - 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). - Critical Risk Management and critical control checklist (CCC) exercises are rigorously performed at all levels. <p>(* information publicly available at https://www.riotinto.com)</p>

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"> - 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. - 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. - 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. - Internal noise and respiratory protection programs are being reviewed. The Management and H&S Coordinators are involved at the beginning of the review and a draft version is presented at the CSS. - Health programs have been approved by the local public health agencies and are implemented and are ongoing. Each site has a specific health program. Medical surveillance is ongoing and each year, exhaustive health sampling is conducted. - The critical health risks are exposure to fluorides, PAH and noise exposure. Operational controls (air extraction, venting, PPE, training) are in place to protect the Workers.
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"> - The OH&S performance is tracked continuously and reported on a monthly basis. - Lagging indicators include frequency and severity on lost time and recordable accidents, all injuries, near-misses and occupational illnesses. - Leading indicators include Critical Risk Management (CRM), maturity level, investigation of maximum reasonable outcome (MRO) and closure of actions. - Health and Industrial Hygiene (IH) lagging indicators include the number of IH cases reported and the number of employees with loss hearing, on a site basis. - Health and Industrial Hygiene leading indicators include the progress on the annual monitoring programs and the 5-year plan, on a site basis. - Similar Exposure Group (SEG) are used to monitor the exposure to a specific contaminant, based on specific tasks and risk exposure. - Health and Industrial Hygiene monitoring results are entered and monitored in specialized medical software. - Data are monitored at site level, entered in the Rio Tinto Business System (RTBS) and consolidated at the RTA/ Rio Tinto levels. The report presents the comparison site by site. The Rio Tinto reports

CRITERION	RATING	COMMENT
		gather all Rio Tinto businesses and provides a benchmark comparison. - Benchmark comparisons of peers are also undertaken with primary aluminium companies' that are members of: <ul style="list-style-type: none"> • The Aluminium Association of Canada (AAC); • The International Aluminium Institute (IAI).

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	29 January 2019	Updated to include revised hyperlinks and document names for external publications
4	10 September 2020	Surveillance Audit including an update of a reference to Montreal Headquarters in the Certification and Scope.
5	15 March 2021	Updated to include the 29 January 2019 revision as Rev 3 and amend 10 September 2020 revision from Rev 3 to Rev 4; Re-Certification Audit (Full Certification Issued)