ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

RIO TINTO ALUMINIUM (RTA) ISAL

CERTIFICATE NUMBER 131 ASI STANDARD PERFORMANCE STANDARD (V2 2017) CERTIFICATION LEVEL PROVISIONAL CERTIFICATION ASI ACCREDITED AUDITOR ERM CVS

DATE OF ISSUE

DATE OF EXPIRY
22 APRIL 2022

CERTIFIED SINCE 23 APRIL 2021

AUTHORISED BY

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

CERTIFICATION SCOPE

Aluminium smelting at the Rio Tinto Iceland Smelter (ISAL).

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Rio Tinto Aluminium Division
ENTITY NAME	Rio Tinto Aluminium (RTA) ISAL
CERTIFICATION SCOPE	Aluminium smelting at the Rio Tinto Iceland Smelter (ISAL).
SUPPLY CHAIN ACTIVITIES	Aluminium SmeltingCasthouses
ASI STANDARD	Performance Standard V2
AUDIT TYPE	Certification Audit
AUDIT FIRM	ERM CVS
AUDIT DATE	• 5 – 26 February 2021
AUDIT REPORT SUBMISSION	• 30 March 2021
AUDIT SCOPE	The audit scope includes aluminium smelting activities at the Rio Tinto Iceland Smelter (ISAL).
	Supply chain activities included in the Audit Scope:
	Aluminium Smelting
	Casthouses
	All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.
	At the time of the Audit (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	Provisional Certification

AUDIT METHODOLOGY	The Auditors confirm that:				
DECLARATION	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	23 April 2021 – 22 April 2022				
NEXT AUDIT TYPE	Surveillance Audit				
NEXT AUDIT DUE DATE	22 October 2021				
CERTIFICATE NUMBER	131				

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT	
PRINCIPLE 1 BUSINESS INTEGRITY			
1.1 Legal Compliance	Conformance	The Entity has in place work procedures to review issued laws and regulations and ensure compliance with applicable law and regulation.	
1.2 Anti-Corruption	Conformance	The Entity has established adequate anti-corruption measures that are approved by the highest management level and are implemented at all relevant corporate levels. In conclusion, a documented and mature program is established to mitigate the risks of anti-corruption, including providing training, formal approval procedures and procedures for increased monitoring of reported situations.	
1.3 Code of Conduct	Conformance	The Entity has implemented an organisational Code of Conduct, 'The Way We Work' that includes relevant principles for ESG performance. The Ethics and Integrity Group is the primary contact for providing advice and receiving complaints or concerns regarding the Code of Conduct. A reporting and 'whistle blower' mechanism is available to provide an avenue for individuals who choose to share their concerns relative to alleged wrongdoing anonymously and confidentially. The Code of Conduct can be found by searching for "the way we work" at: <u>https://www.riotinto.com/sustainability/policies</u> Multiple languages are available.	
PRINCIPLE 2 POLICY & MANAC	G E M E N T		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an integrated Health, Safety, Environment and Communities Policy that is supported by developed and implemented systems, procedures and processes that conform to the environmental, social, and governance policy requirements. This Policy is reviewed annually and available on the Entity's website: https://www.riotinto.is/lisalib/getfile.aspx?itemid=13 19	
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has endorsement and support from senior management, in order to provide sufficient resources for regular review of policies. Senior management endorses, supports through provision of resources and regularly reviews the Policy. The Health, Safety, Environment & Communities Policy can be found at:	

CRITERION	RATING	COMMENT
		https://www.riotinto.is/lisalib/getfile.aspx?itemid=13 19
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Based on objective evidence the Entity communicates its relevant policies internally and externally which conforms to the requirement of this Criterion. The Entity's Policy is available to external and internal stakeholders to raise awareness of the company's commitments. The Policy is publicly available via the Rio Tinto website and can be found on the ISAL website: <u>https://www.riotinto.is/lisalib/getfile.aspx?itemid=13</u> <u>19</u>
2.2 Leadership	Conformance	The Entity has nominated a senior management representative at the site with overall responsibility and authority for conformance with the ASI Performance Standard, and with identified support to ensure implementation and ongoing achievement.
2.3a Environmental and Social Management Systems (environmental)	Conformance	 ISAL has an integrated Health, Safety, Environment and Communities Management System. Rio Tinto undertakes Business Conformance Audits of ISAL against the requirements of the Rio Tinto Management System Standard. ISAL has certified Management Systems aligned to a number of international standards, including: ISO 9001 Quality Management ISO 14001 Environmental Management ISO 45001 Occupational Health & Safety, that are certified by independent accredited certification bodies.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has an integrated Health, Safety, Environment and Communities (HSEC) system that supports developed and implemented processes to conform to national legislative and company social policy requirements. The Entity has endorsement and support from senior management through provision of resources and regular review at the corporate level. The systemised approach that exists to enforce social and human rights related policies is well established as part of the overall HSEC approach.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing Policy that adequately covers environmental, social and governance issues. ISAL procurement is a part of the Rio Tinto central procurement framework, further defined in the corporate Code of Conduct,

CRITERION	RATING	COMMENT
		and procurement policies for goods and services must be followed. Due diligence checks are completed as part of the supplier assessment process.
2.5 Impact Assessments	Conformance	The Entity has conducted extensive environmental, social, cultural and human rights impact assessments in the past, when last subject to new projects or major change. There is a good level of awareness of what would be required in the event of such change in the future, including for gender balance, and there are policies and processes in place that address environmental, social and economic needs in this regard.
2.6 Emergency Response Plan	Conformance	The Entity has site specific, emergency response plans developed in collaboration with potentially affected stakeholder groups such as workers representatives, and relevant agencies. The Emergency Response Team is trained and conducts exercises against the scenarios identified in the plan. Debriefing from training, exercises and real events helps improve the effectiveness of the emergency management processes.
2.7 Mergers and Acquisitions	Conformance	Rio Tinto utilises a group Project Evaluation Standard and associated due diligence processes to manage mergers and acquisitions. Environmental, social and governance issues are covered in this process as documented in the standard and due diligence procedure. The Investment Committee assesses all mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has implemented group policies, processes and procedures that conform to Rio Tinto's closure, decommissioning and divestment requirements. These are documented in the Rio Tinto Closure / Projects Definitions Guidance Note which sets out requirements to be met at various stages of project and operational closure planning.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and economic impacts both on its website and via annual Rio Tinto corporate sustainability reporting. All such information is publicly available. The link for the Rio Tinto Annual Sustainability Report is at: https://www.riotinto.com/sustainability/sustainability- reporting

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		ISAL also publicly reports its environmental, social and economic impacts through a local Sustainability Report, which can be found at: <u>https://www.riotinto.is/lisalib/getfile.aspx?itemid=13</u> 07
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses incidents and non- compliances with applicable law in its public sustainability reporting. Government regulations, environmental regulations and individual site environmental licenses determine what is a breach and what is significant to report. All breaches are ranked using a standard severity matrix and escalated if major or catastrophic. Rio Tinto corporate entity also publicly discloses information on significant fines, judgments, penalties and other sanctions in the Annual Reports and Sustainability Reports.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes to ensure that payments are made only on a legal or contractual basis. Evidence of payments made to government for taxes and royalties are transparent and publicly disclosed in the Entity's Annual Reporting. Reporting includes the Rio Tinto Taxes Paid Report, which can be found at: <u>https://www.riotinto.com/invest/reports/taxes-paid- report</u> ISAL also publicly reports on taxes and payments to the local municipality in the Annual Sustainability Report, available at: <u>https://www.riotinto.is/lisalib/getfile.aspx?itemid=13</u> <u>07</u>
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has in place an accessible, transparent, understandable and culturally and gender sensitive, complaints resolution mechanisms to address any stakeholder complaints, grievances and requests for information that arise. External complaints and comments are flagged directly to the Communications Manager, the Health, Safety, Environment and Quality (HSEQ) Manager and the ISAL reception. What is in place is adequate for the number and nature of the complaints/ grievances received to date.

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4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity evaluates life cycle impacts which covers all major product lines across the group including bauxite from the mines, alumina from the refinery, aluminium and cast products from the smelters. An environmental Life Cycle Analysis (LCA) of aluminium ingots produced by Rio Tinto Alcan was conducted by Quantis in 2014 (Quantis is an internationally renowned firm in LCA). This is a benchmark LCA and was last updated in 2018 by Groupe AGECO and was in the process of being updated at the time of the audit.	
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity's cradle-to-gate Life Cycle Assessment (LCA) data is available upon request by customers.	
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	The Entity evaluates life cycle impacts of its major product lines; the LCA data are available upon request.	
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity minimises the generation of Process Scrap and achieves the target 100% collection, recycling and re-use of this scrap within its own operations.	
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity recovers 100% of aluminium alloys and grades within its own operations for reuse.	
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity processes 100% for reuse of aluminium Process Scrap generated within its own operations and the metal reclaimed from the dross processor. There is no purchasing of external recycled metal so all recycling activity is internal only in a closed loop.	
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity engages on promoting collection and recycling of aluminium through its membership of Samaal, the Aluminium Producers Association of Iceland, and its share in Endurvinnslan, which has a collection system in place for beverage cans, achieving high rates of recovery.	
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS			
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses GHG emissions by source and energy use in its Annual Sustainability Report, see: <u>https://www.riotinto.is/lisalib/getfile.aspx?itemid=13</u> 07	

CRITERION	RATING	COMMENT
5.2 GHG emissions reductions	Conformance	The Entity discloses time-bound GHG goals in their Annual Sustainability Report, see: <u>https://www.riotinto.is/lisalib/getfile.aspx?itemid=13</u> 07
5.3a Aluminium Smelting (management system)	Conformance	The Entity has a certified Environmental Management System to ensure operation controls to limit direct GHG emissions.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity showed that average Scope 1 and Scope 2 GHG emissions are far below the 8 tonnes CO ² -eq per metric tonnes aluminium target.
5.3c Aluminium Smelting (after 2020)	Not Applicable	The Entity has no production from smelters that started from 2020. The existing smelter has been operating since 1969 and has emissions below 8 tonnes CO ² -eq per metric tonnes aluminium.
PRINCIPLE 6 EMISSIONS, EFF	LUENTS AND W	ASTE
6.1 Emissions to Air	Conformance	The Entity has work procedures in place to quantify air emissions and their effect on the environment. The annual quantity and summary of main effects are in the Annual Sustainability Report and more detailed reporting is available to the public online.
6.2 Discharges to Water	Conformance	The Entity has work procedures in place to quantify water use, discharges into the sea and the effect of these discharges on the environment. The annual quantity and summary of main effects are in the Annual Sustainability Report.
6.3a Assessment and Management of Spills and Leakage (assessment)	Unable to Rate	The Entity regularly assesses major and minor risks related to environmental aspects, potential spills and leakage from the production as prescribed in its internal risk assessment and aspects processes and managed via its ISO 14001 certified management system. This will be confirmed during the on-site audit.
6.3b Assessment and Management of Spills and Leakage (management)	Unable to Rate	The Entity has an ISO 14001 certified management system to manage the prevention, detection and minimisation of spills and leakages. For major incidents there is a response team that has been resourced and fully trained to work alongside the local emergency response service.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has procedures and a system in place to report internally and externally about significant spills and potential impact.

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6.4b Reporting of Spills (regular reporting)	Conformance	Evidence supports the conclusion that the Entity has in place processes to publicly disclose information on spills if these were of a significant nature, including their impact and remedial action taken.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a Waste Management Plan and system in place focusing on waste reduction, recycling and reuse.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity discloses in its sustainability reporting on an annual basis, the quantity of hazardous and non-hazardous waste generated by the Entity, and associated waste disposal methods: <u>https://www.riotinto.is/lisalib/getfile.aspx?itemid=13</u> <u>07</u>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Minor Non- Conformance	SPL is placed in a coastal landfill and covered in layers of shell sand. The use of coastal landfill for SPL treated with calcium carbonated is approved as acceptable practice in certain locations in Iceland. However, leachate from the SPL in the coastal landfill can enter the environment and therefore the Entity is not in full compliance with this clause. The method in use is in compliance with the existing operating license issue by the Environment Agency.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has been optimizing processes for the recovery and recycling of carbon and refractory materials from SPL, although such options are not currently available nationally.

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6.7c Spent Pot Lining (SPL) (Untreated SPL)	Minor Non- Conformance	SPL is placed in a coastal landfill and covered in layers of shell sand. The use of coastal landfill for SPL treated with calcium carbonated is approved as acceptable practice in certain locations in lceland. The method is in compliance with the existing operating license issue by the Environment Agency. However, leachate from the SPL in the coastal landfill can enter the environment and therefore the Entity is not in full compliance with this clause.		
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity regularly reviews alternative options and methods in comparison to the current coastal landfill practice for SPL disposal.		
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Minor Non- Conformance	SPL is placed in a coastal landfill and covered in layers of shell sand. The use of coastal landfill for SPL treated with calcium carbonated is approved as acceptable practice in certain locations in lceland. The method is in compliance with the existing operating license issue by the Environment Agency. Although the Entity is not discharging SPL into the marine environment, the leachate from the SPL handled with calcium carbonate does go into the marine environment. Environmental monitoring shows low impact on the environment.		
6.8a Dross (recovery)	Unable to Rate	The Entity is processing dross both internally and externally and the aluminium recovered is recycled in the Entity's casthouse. This will be confirmed during the on-site audit.		
6.8b Dross (recycling)	Unable to Rate	The Entity is processing dross both internally and externally and the aluminium recovered is recycled in the Entity's casthouse. This will be confirmed during the on-site audit.		
6.8c Dross (review of alternatives)	Unable to Rate	The Entity is processing dross both internally and externally and no dross goes to landfill. This approach is kept under regular review. This will be confirmed during the on-site audit.		
PRINCIPLE 7 WATER STEWARDSHIP				
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water withdrawal and use by source and type. Operational water is from the Entity's groundwater wells at the site and is only a small fraction of the volume of the groundwater streams.		

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7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed water-related risks in watersheds in the Entity's area of Influence. The area of influence includes water withdrawal sources as well as receiving waterways and bodies. This includes groundwater and marine environments (harbours, oceans/seas). No significant water related risks have been identified in this assessment. Operational water is from the Entity groundwater wells at the site which use only a small fraction of the volume of the groundwater streams.
7.2a Water management (management plans)	Not Applicable	No significant water related risks have been identified, as observed in the Entity's Environmental Impact Assessment. There are 3 water related risks in the environment risk register, all ranked as low risk and therefore water use is not considered to be a material risk.
7.2b Water management (monitoring)	Conformance	Water use has been assessed and is considered not to be a significant or material risk (see 7.1 and 7.2a). Nevertheless, the Entity implements a water management plan and monitors its effectiveness.
7.3 Disclosure of water usage and risks	Conformance	Water withdrawal and return are tracked and reported to the environmental authority where required. In addition, the Entity discloses water use and possible risks in the Annual Sustainability Report: <u>https://www.riotinto.is/lisalib/getfile.aspx?itemid=13</u> 07
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity assesses the risk and materiality of the impacts on biodiversity from the land use and activities in its area of influence. For the purpose of biodiversity assessments, ISAL's area of influence includes all areas on the asset's lease and receiving environments. This is clearly marked in its environmental monitoring plan. The baseline Environmental Impact Assessment from 2002 concludes low sensitivity, no endangered flora/fauna in the area, and therefore limited impact of ISAL activities. The Environment Agency has deemed it unnecessary to update the baseline information due to the low sensitivity and status quo at the site.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The baseline Environmental Impact Assessment from 2002 concludes low sensitivity, no endangered flora/fauna in the area, and therefore limited

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		biodiversity impact of ISAL activities, or need for biodiversity planning.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The baseline Environmental Impact Assessment from 2002 concludes low sensitivity, no endangered flora/fauna in the area, and therefore limited biodiversity impact of ISAL activities, or need for biodiversity planning around a biodiversity hierarchy.
8.2c Biodiversity management (reporting)	Conformance	All studies are available to the public via the ISAL website: <u>https://www.riotinto.is/?PageID=292</u> The Environment Agency also puts up the same reports. The ISAL website includes seawater, sediment, air and vegetation monitoring information. The Environment Agency posts are not as regular or consistent.
8.3 Alien Species	Not Applicable	No Alien Species are identified as part of the biodiversity baselining and subsequent monitoring activities in the region of the Entity.
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	The Entity has developed and implemented policies, systems, procedures and processes that conform to the Human Rights Due Diligence requirements. Policies that include commitments to respect human rights are available, integrated into activities and implemented. The group approach to human rights and associated reporting can be found at: <u>https://www.riotinto.com/sustainability/human-rights</u> The ISAL Policy is available on the Entity's website: <u>https://www.riotinto.is/lisalib/getfile.aspx?itemid=13</u> <u>19</u>

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9.1b Human Rights Due Diligence (process)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the Human Rights Due Diligence requirements. Policies that include commitments to respect human rights are available, integrated into activities and implemented. The group approach to human rights and associated reporting can be found at: <u>https://www.riotinto.com/sustainability/human-rights</u>
9.1c Human Rights Due Diligence (remediation)	Not Applicable	No cause or contribution to adverse human rights impacts has been reported, and therefore no remedial measures have been required by the Entity to date.
9.2 Women's Rights	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the Women's Rights requirements. Rio Tinto Corporate put in place many policies, tools and resources to ensure women's rights are respected which are utilised, adapted and implemented at the site. A wide range of initiatives are driven by an Equality Plan to ensure that no discrimination between genders exists on various matters. The Entity is subject to the IST 85 Standard that requires compliance with several laws regarding equality and human rights, for which it has external approval and acknowledgement by the Government Department of Equality.
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous Peoples established in the region of the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no Indigenous Peoples established in the region of the Entity.
9.5 Cultural and sacred heritage	Conformance	The Entity operates a site that does not occupy or influence any sacred or cultural heritage areas. Impact assessments of 2002 and later include issues to do with archaeology and heritage and makes no record of anything of significance.
9.6a Resettlements (avoid or minimise)	Not Applicable	Imagery from pre-1968 shows no settlement at the site and sporadic shoreline activity only. No expansion is planned.
9.6b Resettlements (where unavoidable)	Not Applicable	No physical displacement is planned.
9.7a Local Communities (rights and interests)	Conformance	The Entity has in place processes and procedures that respect the rights of local communities. ISAL

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		has completed a social risk assessment and stakeholder mapping process that includes a needs analysis. These form part of the site's Communities and Social Performance Plan.
9.7b Local Communities (impacts)	Conformance	ISAL has completed a stakeholder mapping process, which considers influence and support, as well as a needs analysis. In addition, the site has completed a social risk assessment. The site's engagement strategy is based on this mapping process. The assessment includes processes to establish ways to address adverse impacts or concerns arising from stakeholder meetings and forums. The site is surveyed in terms of reputation in the community. ISAL is considered to be making a positive impact on the immediate community and is an important part of the national economy.
9.7c Local Communities (livelihoods)	Conformance	ISAL has completed a stakeholder process, which considers influence and support, as well as a needs analysis. In addition, the site has completed a social risk assessment. The site's engagement strategy is based on this mapping process. The assessment includes processes to establish ways to address adverse impacts or concerns arising from stakeholder meetings and forums. The site is surveyed in terms of reputation in the community.
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	The Entity is not located in a conflict-affected or high-risk area.
9.9 Security practice	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the security practice requirements. All personnel involved in security, or who supervise security personnel, have completed the Rio Tinto Voluntary Principles on Security and Human Rights (VPSHR) Training.
PRINCIPLE 10 LABOUR RIGHTS	6	
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Unable to Rate	The Entity has developed and implemented policies, systems, procedures and processes that enable employees to join and associate freely in Labour Unions, seek representation and join Workers' Councils without interference; and that conform to the Freedom of Association and Right to Collective Bargaining requirements. This will be confirmed during the on-site audit.

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10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Unable to Rate	The Entity has established and implemented policies and procedures that respect the rights of Workers to collective bargaining, and do not prevent them to participate in any collective bargaining process. This will be confirmed during the on-site audit.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Unable to Rate	Rights of association and workers are supported by national legislation with no restrictions; therefore, no alternative means of association for Workers are sought. This will be confirmed during the on-site audit.
10.2a Child Labour (minimum age)	Unable to Rate	Rio Tinto Human Rights Policy rejects any form of slavery, forced or child labour. Under the Employment Policy, Rio Tinto is committed to not employ forced, bonded or child labour. Rio Tinto's approach to human rights is based upon the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. Hazardous Child Labour or any form of Child Labour is banned. ISAL has in place systems and procedures to ensure that child labour is neither used nor supported. ISAL does not hire anyone under the age of 18 years. ISAL follows Iceland Iaw 46/1980 that covers Child or Forced Labour and European Convention on Human Rights as well as wider requirements for health, safety and workplace conditions. This will be confirmed during the on-site audit.
10.2b Child Labour (hazardous)	Unable to Rate	Under the Employment Policy, Rio Tinto is committed to not employ forced, bonded or child labour. Rio Tinto's approach to human rights is based upon the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. Hazardous Child Labour or any form of Child Labour is banned. ISAL has in place systems and procedures to ensure that it does not engage in nor support hazardous child labour in any form. ISAL does not hire anyone under the age of 18 years. This will be confirmed during the on-site audit.
10.2c Child Labour (worst forms)	Unable to Rate	Rio Tinto's Human Rights Policy rejects any form of slavery, forced or child labour. Under the Employment Policy, Rio Tinto is committed to not employ forced, bonded or child labour. Rio Tinto's approach to human rights is based upon the Universal Declaration of Human

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		Rights and the UN Guiding Principles on Business and Human Rights. Hazardous Child Labour or any form of Child Labour is banned. The Entity has in place systems and procedures to ensure that it does not engage in nor support worst forms of child labour. ISAL does not hire anyone under the age of 18 years. This will be confirmed during the on-site audit.
10.3a Forced Labour (human trafficking)	Unable to Rate	The Entity does not support any form of human trafficking related or not related to forced labour, deposits, debts or bonds for employment, any restriction to the freedom of movement or workers, or termination of employment with penalty and unreasonable notice. Policies and procedures are implemented and followed to prevent these situations. This will be confirmed during the on-site audit.
10.3b Forced Labour (deposits, fees, advances)	Unable to Rate	The Entity does not engage in or support any form of forced labour as defined in the relevant ILO Conventions related to forced labour, deposits, debts or bonds for employment, any restriction to the freedom of movement or workers, or termination of employment with penalty and unreasonable notice. Policies and procedures are implemented and followed to prevent these situations. This will be confirmed during the on-site audit.
10.3c Forced Labour (migrant workers)	Unable to Rate	The Entity does not support any form of forced labour related or not related to deposits, debts or bonds of another form for employment, any restriction to the freedom of movement or workers, or termination of employment with penalty and unreasonable notice. Policies and procedures are implemented and followed to prevent these situations. This will be confirmed during the on-site audit.
10.3d Forced Labour (debt bondage)	Unable to Rate	The Entity does not support any form of forced labour related or not related to deposits, debts or bonds for employment, any restriction to the freedom of movement or workers, or termination of employment with penalty and unreasonable notice. Policies and procedures are implemented and followed to prevent these situations. This will be confirmed during the on-site audit.
10.3e Forced Labour (freedom of movement)	Unable to Rate	The Entity does not support any restriction to the freedom of movement of workers, except where

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		health and safety precaution or training is needed. Policies and procedures are implemented and followed to prevent these situations. This will be confirmed during the on-site audit.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Unable to Rate	The Entity does not support any retention of original copies of identity papers, work permits, travel documents or other related bond for employment. Policies and procedures are implemented and followed to prevent these situations. This will be confirmed during the on-site audit.
10.3g Forced Labour (freedom to terminate employment)	Unable to Rate	Workers can terminate their employment at any time without penalty, given a standard notice period as identified in the collective agreement or employment contracts. Policies and procedures are implemented and followed to prevent any situation where workers are not given the freedom to terminate their employment. This will be confirmed during the on-site audit.
10.4 Non-Discrimination	Unable to Rate	The Entity has established and implemented processes and procedures to promote and to ensure equal opportunities and anti-discrimination in hiring, salary, promotion, training, advancement or termination of Workers on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other discriminatory condition. This is supported locally and by the Ethics and Integrity Group that provides a whistle blower mechanism for individuals to share their concerns anonymously and confidentially. This will be confirmed during the on-site audit.
10.5 Communication and engagement	Unable to Rate	The Entity has in place numerous communication forums and mechanisms to ensure direct engagement between management, workers and their representatives regarding working conditions and resolution of workplace and compensation issues. There are processes in place to manage fair treatment and grievance without threat of reprisal, intimidation or harassment. This will be confirmed during the on-site audit.
10.6 Disciplinary practices	Unable to Rate	The Entity has in place disciplinary practices and procedures that are fair, clearly communicated and do not entail or tolerate corporal punishment, mental or physical coercion, harassment, and gender-based violence or verbal abuse.

CRITERION	RATING	COMMENT
10.7a Remuneration (living wage)	Unable to Rate	The Entity has in place policies and processes that respect the right of workers to a living wage that meets and often exceeds the industry minimum standard, being sufficient to meet the basic and discretionary needs of Workers. This is governed predominantly by the Collective Agreements in place between the Entity and respective unions. Rio Tinto conduct an annual pay health check and market position review (salary survey) to ensure wages continue to provide the appropriate purchasing power for employees. This will be confirmed during the on-site audit.
10.7b Remuneration (method of payment)	Unable to Rate	A method is in place that makes wage payments on a timely basis, in legal tender and provides full payment information to employees without delay. Payments are made electronically direct to the employee. This will be confirmed during the on-site audit.
10.8 Working Time	Unable to Rate	The Entity has developed and implemented policies and procedures to ensure compliance with applicable law and industry standards on working time and overtime via the Collective Agreement(s) There is not a mandatory requirement for employees to work beyond the number of hours of the Agreement. This will be confirmed during the on-site audit.
PRINCIPLE 11 OCCUPATIONAL	HEALTH AND	SAFETY
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has an integrated Health, Safety, Environment and Communities Policy (HSEC) that is supported by developed and implemented systems and processes that conform to national legislative and scheme specific occupational health and safety policies requirements. The Entity has endorsement and support from senior management of the HSEC Policy. The Entity communicates policies internally and externally which conforms to the requirement of this criterion. The Policy is publicly available via the ISAL website and its sustainability reporting.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has an integrated Health, Safety, Environment and Communities Policy (HSEC) that is supported by developed and implemented systems and processes that conform to national legislative and scheme specific occupational health and safety policies requirements. The HSEC Policy is communicated around the site, posted online and

CRITERION	RATING	COMMENT
		communicated via new starter and contractor inductions.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has an integrated Health, Safety, Environment and Communities Policy (HSEC) that is supported by developed and implemented systems and processes that conform to national legislative and scheme specific occupational health and safety policies requirements. Whilst there is no direct reference to the ILO Conventions on Occupational Health and Safety within the HSEC Policy, this Criterion is met through the implementation of the integrated HSE Management System.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has an integrated Health, Safety, Environment and Communities Policy (HSEC) that is supported by developed and implemented systems and processes that conform to national legislative and scheme specific occupational health and safety policies requirements. It is not currently explicit in the ISAL HSEC Policy that workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. However, the Policy refers directly to employees empowered to create a safe workplace. This clearly infers the right of workers to understand the hazards and the safe practices for their work, including the duty to refuse or stop any unsafe work implemented through its STOP operational program.
11.2 OH&S Management System	Conformance	The Entity has developed and implemented health and safety policies, systems, procedures and processes that conform to the Rio Tinto Management System requirements. ISAL has an integrated Health, Safety, Environment and Communities Management System that is independently certified against a number of international standards, including: - ISO 9001 Quality Management - ISO 14001 Environmental Management - ISO 45001 Occupational Health & Safety.
11.3 Employee engagement on health and safety	Unable to Rate	The Entity has developed and implemented policies, systems, procedures and processes that conform to the employee engagement on health and safety requirements. Regular Lean meetings convene all employees across shifts and monthly Health, Safety, Environment (HSE) meetings involve all employees for performance summary

CRITERION	RATING	COMMENT
		and exchange. The Occupational Health and Safety (OHS) Committee is well represented at Union and staff level with consistent attendance and resultant action planning. This will be confirmed during the on-site audit.
11.4 OH&S performance	Conformance	The Entity has developed and implemented OHS objectives and targets to comply with internal and group policy and legislative requirements, and to drive occupational health and safety (OHS) performance improvement. There is regular daily, weekly, and monthly reporting at site and group level against main lagging and leading indicators, and best practice within the group is drawn upon for system and process improvement.

Document Control and Version History

Revision	Date	Notes
0	23 April 2021	Initial Certification Audit – Provisional Certification