

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# UC RUSAL

CERTIFICATE  
NUMBER

34

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

DNV  
BUSINESS  
ASSURANCE  
SERVICES  
UK LTD.

DATE OF ISSUE

20 JUNE 2019

DATE OF EXPIRY

19 JUNE 2022

CERTIFIED SINCE

20 JUNE 2019

AUTHORISED BY

A stylized, handwritten signature in black ink, appearing to be 'J. H.' followed by a long horizontal stroke.

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

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at*

**[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)**

## CERTIFICATION SCOPE

Headquarters (Moscow, Russia) manages the following facilities: Boksit Timana (Bauxite mining, Russia); RUSAL Kamensk-Uralskiy (UAZ) (Alumina refining, Russia); Branch of RUSAL Bratsk in Shelekhov (IrkAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); RUSAL Sayanogorsk (SAZ) (Aluminium smelting and casthouse which consists of two production units SAZ and KhAZ, Russia); Kubikenborg Aluminium AB (KUBAL) (Aluminium smelting, casthouse, Sweden); Boguchansk Aluminium Smelter (BoAZ) (Aluminium smelting, casthouse, Russia); RUSAL Krasnoyarsk (KrAZ) (Aluminium smelting and casthouse which consists of three production units KrAZ-1, KrAZ-2, KrAZ-3, Russia); RUSAL Bratsk (BrAZ) (Aluminium smelting and casthouse which consist of three production units BrAZ-1, BrAZ-2, BrAZ-3 and semi-fabrication, Russia).

# SUMMARY AUDIT REPORT

## PERFORMANCE

## STANDARD

### OVERVIEW

MEMBER NAME	UC Rusal
ENTITY NAME	UC Rusal
CERTIFICATION SCOPE	Headquarters (Moscow, Russia) manages the following facilities: Boksit Timana (Bauxite mining, Russia); RUSAL Kamensk-Uralskiy (UAZ) (Alumina refining, Russia); Branch of RUSAL Bratsk in Shelekhov (IrkAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); RUSAL Sayanogorsk (SAZ) (Aluminium smelting and casthouse which consists of two production units SAZ and KhAZ, Russia); Kubikenborg Aluminium AB (KUBAL) (Aluminium smelting, casthouse, Sweden); Boguchansk Aluminium Smelter (BoAZ) (Aluminium smelting, casthouse, Russia); RUSAL Krasnoyarsk (KrAZ) (Aluminium smelting and casthouse which consists of three production units KrAZ-1, KrAZ-2, KrAZ-3, Russia); RUSAL Bratsk (BrAZ) (Aluminium smelting and casthouse which consists of three production units BrAZ-1, BrAZ-2, BrAZ-3 and semi-fabrication).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Semi-Fabrication</li><li>• Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Certification Audit (20 February – 28 March 2019)</li><li>• Scope Change Audit (desktop: 20 April – 15 July 2020; on-site 21 September – 1 October 2020)</li><li>• Surveillance Audit (desktop: 14 – 23 April 2021; on-site: 20 May 2021)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 20 February – 28 March 2019 (Certification Audit)</li><li>• 20 April – 15 July 2020 (desktop) and 21 September – 1 October 2020 (on-site) (Scope Change Audit)</li><li>• 14 – 23 April 2021 (desktop) and 20 May 2021 (on-site) (Surveillance Audit)</li></ul>

- 21 May 2019 (Certification Audit)
- 11 November 2020 (Scope Change Audit)
- 8 June 2021 (Surveillance Audit)

AUDIT SCOPE

Certification Audit (20 February – 28 March 2019)

Included UC Rusal Headquarters (Moscow, Russia) and the following facilities: JSC Boksit Timana (bauxite mining, Russia); RUSAL Kamensk-Uralskiy (alumina refining, Russia); Branch of PJSC RUSAL Bratsk in Shelekhov (aluminium smelting, casthouse, semi-fabrication, Russia).

Supply chain activities included in the audit scope:

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

All relevant criteria in the ASI Performance Standard were included in the audit scope.

Scope Change Audit (desktop: 20 April – 15 July 2020; on-site 21 September – 1 October 2020)

Included PJSC RUSAL Bratsk (Aluminium smelting, casthouse and semi-fabrication, Russia), JSC Boguchansk Aluminium Smelter (Aluminium smelting, casthouse, Russia), JSC RUSAL Krasnoyarsk (Aluminium smelting, casthouse, Russia), JSC RUSAL Sayanogorsk (Aluminium smelting, casthouse, Russia) and Kubikenborg Aluminium AB (Aluminium smelting, casthouse, Sweden).

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Semi-Fabrication
- Casthouses

All relevant criteria in the ASI Performance Standard were included in the audit scope.

Due to COVID-19 related travel restrictions and in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), the scope change audits included two stages: 1. A desktop exercise, including a remote review of relevant documentation and, 2. On-site audits.

Surveillance Audit (desktop: 14 – 23 April 2021; on-site: 20 May 2021)

Included UC Rusal Headquarters (Moscow, Russia) and the following facilities: JSC Boksit Timana (bauxite mining, Russia); RUSAL Kamensk-Uralskiy (alumina refining, Russia); Branch of PJSC RUSAL Bratsk in Shelekhov (aluminium smelting, casthouse, semi-fabrication, Russia).

Supply chain activities included in the audit scope:

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

- Casthouses

All relevant criteria in the ASI Performance Standard were included in the audit scope.

At the time of the Audit (April - May 2021), access to all the sites was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and an on-site audit at UC Rusal Headquarters.

#### 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

20 June 2019 – 19 June 2022

#### NEXT AUDIT TYPE

Re-Certification Audit

#### NEXT AUDIT DUE DATE

19 June 2022

#### CERTIFICATE NUMBER

34

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented and maintained systems to ensure awareness and compliance with Applicable Law. Compliance with Applicable Law is ensured via electronic legal services available for employees, internal audits undertaken, special training and briefings focused on employees' legal awareness. "SignAL" hotline is a tool also implemented to report potential non-conformances identified against Applicable Law, accessible at: <a href="https://rusal.ru/en/contacts/#signal">https://rusal.ru/en/contacts/#signal</a></p> <p>The mechanism of Legal Compliance evaluation is also based on implemented Management Systems of the Entity (in accordance with ISO 14001 and 45001). Certificates of these Management Systems can be viewed on a RUSAL web-portal: <a href="https://rusal.ru/en/clients/product-quality/">https://rusal.ru/en/clients/product-quality/</a></p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established and maintains Anti-Corruption policies and procedures in all its forms, including extortion and bribery. The Entity's Anti-Corruption Policy is accessible on the website: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a> or: <a href="https://rusal.ru/upload/policy/AntiCorruptionENG.pdf">https://rusal.ru/upload/policy/AntiCorruptionENG.pdf</a></p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct that includes principles that meet the specified level of environmental, social and governance performance. RUSAL's Code of Conduct is accessible via the link below in three languages: <a href="https://rusal.ru/sustainability/approaches/corporate-code-of-ethics/">https://rusal.ru/sustainability/approaches/corporate-code-of-ethics/</a>.</p> <p>The company is one of the leaders in business ethics practices and was a facilitator and organizer of Business Ethics Day conference in Russia.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented and maintains up-to-date policies in accordance with the environmental, social and governance practices included in the ASI Performance Standard: <a href="https://rusal.ru/en/sustainability/approaches/">https://rusal.ru/en/sustainability/approaches/</a></p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>For implementation obligations of policies, the senior management provides necessary resources and regularly reviews the policies. The top management's endorsement is provided in the frame of implemented</p>

CRITERION	RATING	COMMENT
		Management Systems in accordance with Standards ISO 9001:2015, 14001:2015 and ISO 45001:2018.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Policies are communicated both internally and externally in accordance with the ASI Performance Standard's requirements using multiple methods of communication: <a href="https://rusal.ru/en/sustainability/approaches/">https://rusal.ru/en/sustainability/approaches/</a> .
2.2 Leadership	Conformance	The Senior Management Representatives with overall responsibility and authority to ensure compliance with the requirements of the ASI Performance Standard, are the heads of appropriate Entity's departments.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented the Environmental Management System. The certificates are accessible on the Entity's website: <a href="https://rusal.ru/en/clients/product-quality/">https://rusal.ru/en/clients/product-quality/</a> and on the Boguchansk Aluminium Smelter website: <a href="https://www.boaz-zavod.ru/about/certificates/">https://www.boaz-zavod.ru/about/certificates/</a> .
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management System has been established and implemented: <a href="https://rusal.ru/en/sustainability/approaches/">https://rusal.ru/en/sustainability/approaches/</a> .
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance aspects, which is available on the Company's website. The Entity is listed with a bronze medal for the EcoVadis Sustainability Rating 2020 in the Corporate Social Responsibility (CSR) Assessment Report of May 2020.
2.5 Impact Assessments	Conformance	The Entity conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for New Projects or major changes to existing facilities.
2.6 Emergency Response Plan	Conformance	The Entity has developed Emergency Response Plans in accordance with Applicable Law and in collaboration with potentially affected Stakeholders groups. Sites carry out emergency trainings on a permanent basis in accordance with legal requirements and risks. For hazardous industrial objects and hydro-technical facilities, special exercises are conducted in cooperation with authorized external bodies.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	Mergers and Acquisitions are carried out in line with the Entity's internal procedure to review environmental, social and governance issues in the due diligence process.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity reviews environmental, social and governance issues when planning Closure, Decommissioning and Divestment objects.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The UC RUSAL Sustainability Report is prepared and published annually. The reporting boundaries include all production sites. The Sustainability Report is a detailed document with reliable, verified information, which discloses the governance approach and all material environmental, social and economic impacts. The Report is accessible on the website: <a href="https://rusal.ru/en/sustainability/report/">https://rusal.ru/en/sustainability/report/</a> .
3.2 Non-compliance and liabilities	Conformance	Where Applicable Law so requires or allows, information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law, is publicly disclosed. Information about the non-monetary penalties imposed by the Russian state authorities is publicly accessible in accordance with the laws of the Russian Federation.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity makes, or has made on its behalf, payments to governments on a legal and contractual basis. All payments pass through several stages of verification in accordance with the procedures and Standards of the Entity, including cashless payments to government authorities.
3.3b Payments to governments (disclosure – bauxite mining)	Conformance	The Entity discloses payments to the governments in the Company Annual Report, which is accessible on the website: <a href="https://rusal.ru/en/investors/financial-stat/annual-reports/">https://rusal.ru/en/investors/financial-stat/annual-reports/</a>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented an effective Complaints Resolution Mechanism for accounting of all Stakeholder (external and internal) complaints, grievances and requests.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The “cradle-to-gate” assessment includes consideration of the production's life cycle from

CRITERION	RATING	COMMENT
		bauxite ore extraction to production of alloys, including the usage of the raw materials and other materials, energy use, air emissions, waste generation and other environmental aspects.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Upon customer request, the Entity provides adequate “cradle-to-gate” Life Cycle Assessment (LCA) information on its Aluminium (containing) Product(s).
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity demonstrated existing public access to the LCA information and its underlying assumptions including system boundaries.
4.2 Product design	Conformance	The Entity integrates clear objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the end product.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity recycles 100% of aluminium scrap, including scrap of aluminium alloys, which was generated within its own operations.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has in place an effective system for separating aluminium alloys and grades and following recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has a recycling strategy with specific timelines, activities and targets. Considering the Entity’s position in the supply chain, the Strategy includes the target to internally recycle 100% of the generated scrap, as well as to increase the recycling ratio of end-of life products containing aluminium via membership in national aluminium association.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity does not use aluminium scrap in its production activities except for recycling of its own scrap. The Entity is engaged with national collection and recycling systems to support efforts to increase recycling rates in their respective markets for their products containing Aluminium where it is possible.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity annually keeps records and publicly discloses information about its GHG emissions in their Sustainability Report: <a href="https://rusal.ru/en/sustainability/report/">https://rusal.ru/en/sustainability/report/</a> Calculations of the Entity’s GHG emissions and the carbon footprint of aluminium are verified by independent audit companies.



CRITERION	RATING	COMMENT
5.2 GHG emissions reductions	Conformance	The Entity sets strategic goals to reduce climate impact. The goals are communicated to the general public in Annual Reports that are accessible on the Company's website: <a href="https://rusal.ru/en/sustainability/report/">https://rusal.ru/en/sustainability/report/</a>
5.3a Aluminium Smelting (management system)	Conformance	The Entity has demonstrated that it has put in place a Management System, evaluation procedures, and operating controls to limit the Direct GHG Emissions. The greenhouse gas (GHG) emissions calculations are carried out on an annual basis and are verified by independent audit companies. The common information about the system is in the UC RUSAL Sustainability Report, section Climate Change: <a href="https://rusal.ru/en/sustainability/report/">https://rusal.ru/en/sustainability/report/</a>
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has demonstrated that the average Direct and Indirect GHG Emissions (Scope 1 and Scope 2) from each smelter within the Certification Scope, are well below 8 tonnes CO2-eq per metric tonne of Aluminium. Most of the Entity's sites use electricity from hydropower plants. According to the Carbon Disclosure Project in 2020, RUSAL was recognized as one of the global leaders in GHG management of its supply chain for 2018: <a href="https://rusal.ru/en/press-center/press-releases/rusal_is_recognized_as_global_leader_by_carbon_disclosure_project_cdp/?sphrase_id=9357">https://rusal.ru/en/press-center/press-releases/rusal_is_recognized_as_global_leader_by_carbon_disclosure_project_cdp/?sphrase_id=9357</a>
5.3c Aluminium Smelting (after 2020)	Not Applicable	Within the Certification Scope, there are no plans to start up Aluminium Smelters after 2020.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity quantifies emissions to atmosphere, taking into account national legal requirements and other commitments, if any. Information is disclosed in the Sustainability Report.
6.2 Discharges to Water	Minor Non-Conformance	The Entity quantifies Discharges to Water, taking into account national legal requirements and other commitments, if any. Information is disclosed in the Sustainability Report. At one smelter, the action plan to minimize adverse impacts to water, has not been documented. However, the issue is being managed and is under control.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The assessment of major risk areas of operations with possible Spills and Leakages with a possible contamination of air, water and/or soil, are carried out.

CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has management and external communications plans, compliance controls and a monitoring program in place to prevent and detect spills and leakages. The plans are updated regularly.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity implemented procedures for an immediate notification by affected parties about volume, type and potential impact of significant spills.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publicly discloses impact assessments of significant spills (if any occur) and remediation actions taken, and reports publicly on an annual basis in the Sustainability Report: <a href="https://rusal.ru/en/sustainability/report/">https://rusal.ru/en/sustainability/report/</a>
6.5a Waste management and reporting (strategy)	Conformance	The Entity implements a waste management strategy in accordance with the Environmental Policy, taking into account national legal requirements and other commitments, if any.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses, on an annual basis, the quantity of Hazardous and non-Hazardous Waste generated by the Entity, and associated Waste disposal methods in the Sustainability Report: <a href="https://rusal.ru/en/sustainability/report/">https://rusal.ru/en/sustainability/report/</a>
6.6a Bauxite Residue (storage construction)	Conformance	Water circulation drainage systems are implemented and in full function at the Bauxite Residue storage facilities. Storage areas are constructed in a manner that effectively prevent the release of Bauxite Residue and leachate to the environment.
6.6b Bauxite Residue (integrity checks and controls)	Conformance	The efficiency and safety of Bauxite Residue storages during operation are ensured through maintenance, regular inspections and control checks, monitoring of the condition of facilities, including those with involvement of specialized organizations.
6.6c Bauxite Residue (water discharge)	Conformance	At Bauxite Residue storages, the water circulation drainage systems with zero discharge are implemented and are functioning.
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	The Entity does not discharge Bauxite Residue to marine and aquatic environments.
6.6e Bauxite Residue (start of the art technologies)	Conformance	The Entity has established a program (roadmap) for the residue facilities prospective development for Bauxite Residue storage, taking into account the possibility of transition to the best available technologies.

CRITERION	RATING	COMMENT
6.6f Bauxite Residue (remediation)	Conformance	In case of Bauxite Residue area closure, the Entity monitors its condition and environmental impacts, as well as rehabilitates disturbed areas in accordance with the Applicable Law.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity ensures the storage and management of Spent Pot Lining (SPL) in a manner to prevent the release or leachate to the environment.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	For optimization processes of recovery and recycling of carbon and refractory of SPL materials and in accordance with Waste Mitigation Hierarchy, the Entity strives to minimize volume of SPL generation by increasing service life of PL (period between pot relining). Carbon from SPL is transferred to specialized licensed organizations for recycling purposes. Refractory materials from SPL are partly transferred to specialized organizations for recycling.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	Carbon from SPL is transferred to specialized licensed organizations for recycling purposes. Refractory from SPL is partly transferred to specialized organizations, but is mainly landfilled at waste disposal sites. Untreated SPL is not landfilled where there is a potential for adverse environmental effects.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	Carbon from SPL is transferred to specialized licensed organizations for recycling purposes. Alternative options to landfilling of treated SPL and/or stockpiling of refractory SPL, are reviewed annually while looking for potential consumers.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity does not discharge SPL into the marine or aquatic environment.
6.8a Dross (recovery)	Conformance	100% of Dross is transferred to third parties for usage/recycling.
6.8b Dross (recycling)	Minor Non-Conformance	100% of Dross is transferred to third parties for usage/recycling. At one of the facilities the Dross was stored outside, and in volumes in contravention of the environmental permit. However, the issue is under control and the Facility implemented actions to transfer the whole Dross amount to specialized organizations for recycling purposes.
6.8c Dross (review of alternatives)	Conformance	No Dross is sent to landfill (100% is transferred for recycling or re-use).

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity has developed a water balance, which defines its water withdrawal, usage and consumption by source and type.
7.1b Water assessment (risk assessment)	Conformance	<p>Water-related risks in Watersheds in the Entity's Area of Influence are assessed in the Entity's Risk Management System and the Entity's Environmental Management System.</p> <p>The Entity's risks are assessed taking into account two key factors, which characterize materiality of the risks, including the likelihood of risk realization and evaluation of potential loss as a result of the risk realization. The Entity's risk assessment process also considers applied control measures when determining level of significance and materiality. Based on this approach there are no material Water-related risks in Watersheds in the Entity's Area of Influence.</p>
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable, because there were no material Water-related Risks in Watersheds in the Entity's Area of Influence. Notwithstanding, the Entity has adequate systems and controls in place for water management. The Risk Management System considers all existing risk-related control measures when risks are evaluated. However, there are effective water related monitoring and control measures (actions) applied (implemented) within the Entity's Environmental Management System (including water quality monitoring, waste water treatment, water consumption measurement, water bodies control). The Entity also has defined a plan of water consumption reduction, aligned with the RUSAL Environmental Policy. All information is reported regularly to the Environmental Agency.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, because there were no material Water-related Risks in Watersheds in the Entity's Area of Influence. However, the Entity monitors effectiveness of taken actions through regular water consumption measurements, water quality measurements, water bodies quality and levels control. The effectiveness of water management plans is also monitored.
7.3 Disclosure of water usage and risks	Conformance	<p>As part of its annual Sustainability Reporting, the Entity discloses the information on water withdrawal and use:</p> <p><a href="https://rusal.ru/en/sustainability/report/">https://rusal.ru/en/sustainability/report/</a></p>

CRITERION	RATING	COMMENT
8.1 Biodiversity assessment	Conformance	The Entity's facilities assess risks and materiality of the impacts on biodiversity from land use and activities in the Entity's Area of Influence. Facilities organize and conduct biodiversity researches and biodiversity monitoring in cooperation with research-scientific organizations. These revealed no significant risks and impacts on biodiversity in the Entity's Area of Influence.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	There were no significant risks and impacts on biodiversity in the Entity's Area of Influence.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	There were no significant risks and impacts on biodiversity in the Entity's Area of Influence.
8.2c Biodiversity management (reporting)	Not Applicable	There were no significant risks and impacts on biodiversity in the Entity's Area of Influence.
8.3 Alien Species	Conformance	In order to prevent accidental or deliberate introduction of Alien Species, the Entity carries out a risk assessment, which is a part of the risk assessment of biodiversity and materiality of the impact on biodiversity. Packaging wood has been identified as the most likely way of introducing Alien Species. To prevent introduction, all packing wood is controlled and, when required, treated.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Conformance	The Entity does not explore or develop new mines in World Heritage properties.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	The Entity does not carry out activities, including exploration work, in the locations of World Heritage sites.
8.5a Mine rehabilitation (best available techniques)	Conformance	Mine closure is not planned in the near future. As soon as the decision to close is made, the Entity will rehabilitate environments disturbed or occupied by mining activities, using the best available techniques.
8.5b Mine rehabilitation (financial provisions)	Conformance	The Entity provides financial provisions to ensure availability of adequate resources to meet rehabilitation and mine closure requirements.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity implemented the policies that reflect commitments to respect Human Rights in accordance with the UN Guiding Principles on Business and Human Rights:

CRITERION	RATING	COMMENT
		<a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a>
9.1b Human Rights Due Diligence (process)	Conformance	A Human Rights Due Diligence Process provides addressing actual and potential impacts on the Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has implemented processes for remediation of adverse Human Rights impacts, if any: <a href="https://rusal.ru/en/contacts/#signal">https://rusal.ru/en/contacts/#signal</a>
9.2 Women's Rights	Conformance	The Entity has implemented the Human Rights Policy based on the recommendations of international Standards, including the CEDAW, accessible on the website: <a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a> This ensures a practice of respecting rights and interests of women. Also, the rights and interests of women are protected by Labour Code of the Russian Federation (section 41) including prohibiting any form of discrimination (section 3).
9.3 Indigenous Peoples	Not Applicable	Analyzed information supports absence of Indigenous Peoples or their lands, territories and resources in the places of business and the Areas of Influence of the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Analyzed information supports absence of Indigenous Peoples or their lands, territories and resources in the places of business and the Areas of Influence of the Entity.
9.5 Cultural and sacred heritage	Not Applicable	Analyzed information supports absence of cultural and sacred heritage sites in the places of business and the Areas of Influence of the Entity.
9.6a Resettlements (avoid or minimise)	Not Applicable	When making the project design, the Entity takes into consideration the issues of resettlements in accordance with Applicable Law requirements. Any project design documentation should include the volume with environmental and social impact assessments and an analysis of feasible alternatives to avoid or minimize physical and/or economic displacement. No relocations or resettlements are planned for the foreseeable future.
9.6b Resettlements (where unavoidable)	Not Applicable	When making the project design, the Entity takes into consideration the issues of resettlements in accordance with Applicable Law requirements. No

CRITERION	RATING	COMMENT
		relocations or resettlements are planned for the foreseeable future. There have been no resettlements for the Entity's Certification Scope, since it has become an ASI Member.
9.7a Local Communities (rights and interests)	Conformance	<p>In accordance with the Entity's Human Rights Policy the Entity recognizes the impact on Local Communities in the regions and countries of its operation:  <a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a></p> <p>No issues affecting Local Communities have been identified during the Human Rights Due Diligence along Criterion 9.1. The Entity's activities do not impact interests of Local Communities on their lands and livelihoods. The Entity has a process for engaging with the Local Communities, explore opportunities to support Local Communities' livelihoods and interests even if there was no adverse impact identified. E.g. the Company has built objects of infrastructure for the Local Community such as medical centres (incl. for patients with COVID-19), kindergartens, houses, and associated infrastructure.</p>
9.7b Local Communities (impacts)	Conformance	No issues affecting Local Communities have been identified during the Human Rights Due Diligence along Criterion 9.1. The Entity's activities do not impact interests of Local Communities on their lands and livelihoods. If actual or potential adverse impacts were to arise from the Entity's activities, the Entity has a process for addressing these adverse impacts on the Local Community's livelihoods.
9.7c Local Communities (livelihoods)	Conformance	No issues affecting Local Communities have been identified during the Human Rights Due Diligence along Criterion 9.1. The Entity's activities do not impact interests of Local Communities on their lands and livelihoods. The Entity has a process for engaging with the Local Communities, explore opportunities to support Local Communities' livelihoods and interests even if there was no adverse impact identified.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity does not contribute to and does not promote armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. Also, the Entity does not allow or facilitate extraction, supply or use in manufacturing of the conflict areas' originated minerals, the proceeds of which may be used to



CRITERION	RATING	COMMENT
		finance violence in countries where such minerals are extracted.
9.9 Security practice	Conformance	The Entity ensures respect for Human Rights when involving with private or public security services.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity provides the Freedom of Association and the Right to Collective Bargaining. The Entity's Human Rights Policy is accessible on the website: <a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Participation in a Collective Bargaining Process is conducted in good faith and with adherence to Collective Bargaining Agreements.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity operates in countries where Applicable Law does not restrict the right to the Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	Child Labour is not used or supported by the Entity.
10.2b Child Labour (hazardous)	Conformance	Child Labour is not used or supported by the Entity.
10.2c Child Labour (worst forms)	Conformance	Child Labour is not used or supported by the Entity.
10.3a Forced Labour (human trafficking)	Conformance	In accordance with the Entity's Human Rights Policy and the Code of Corporate Ethics, the Entity does not engage in, or support human trafficking either directly, or through any employment or recruitment agencies. These documents are available at; <a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a> and <a href="https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/">https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/</a> The implemented Management System provides legislation compliance in this area.
10.3b Forced Labour (deposits, fees, advances)	Conformance	In accordance with the Entity's Human Rights Policy: and the Code of Corporate Ethics, the Entity does not require any form of deposit, recruitment fee or equipment in advance from Workers, either directly, or through employment or recruitment agencies. These documents are available at; <a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a> and <a href="https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/">https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/</a> The implemented Management System provides legislation compliance in this area.



CRITERION	RATING	COMMENT
10.3c Forced Labour (migrant workers)	Conformance	<p>In accordance with the Entity's Human Rights Policy: and the Code of Corporate Ethics, the Entity does not require migrant workers to lodge deposits or security payments. These documents are available at;</p> <p><a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a> and</p> <p><a href="https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/">https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/</a></p> <p>The implemented Management System provides legislation compliance in this area.</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>In accordance with the Entity's Human Rights Policy: and the Code of Corporate Ethics, the Entity does not hold workers in debt bondage or force them to work in order to pay off a debt. These documents are available at;</p> <p><a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a> and</p> <p><a href="https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/">https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/</a></p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>In accordance with the Entity's Human Rights Policy: and the Code of Corporate Ethics, the Entity does not restrict the freedom of movement of Workers in the workplace or in on-site housing. These documents are available at;</p> <p><a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a> and</p> <p><a href="https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/">https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/</a></p> <p>The Entity's implemented Management Systems provide legislation compliance in this area.</p>
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>In accordance with the Entity's Human Rights Policy: and the Code of Corporate Ethics, the Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates. These documents are available at;</p> <p><a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a> and</p> <p><a href="https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/">https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/</a></p> <p>The Entity's implemented Management Systems provides legislation compliance in this area.</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>In accordance with the Entity's Human Rights Policy: and the Code of Corporate Ethics, Workers are free to terminate employment without penalty in accordance with the legislation requirements. These documents are available at;</p>

CRITERION	RATING	COMMENT
		<a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a> and <a href="https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/">https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/</a> The Entity's implemented Management Systems provide legislation compliance in this area.
10.4 Non-Discrimination	Conformance	In accordance with the Entity's Human Rights Policy: and the Code of Corporate Ethics, any discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on any grounds, is prohibited. These documents are available at; <a href="https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf">https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</a> and <a href="https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/">https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics/</a> The same requirements are implemented by internal procedures at sites of the Entity.
10.5 Communication and engagement	Conformance	The Entity's Management Systems ensure open communication and direct interaction with Workers and their representatives, regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	No cases of corporal punishment use, mental or physical coercion, harassment, and gender-based violence, including sexual harassment, or verbal abuse of Workers were revealed.
10.7a Remuneration (living wage)	Conformance	Remuneration in the Entity is one of the highest across the industry and meets legal and industry Standards, the basic needs of employees, and provides some discretionary income.
10.7b Remuneration (method of payment)	Conformance	Wage payments are carried out timely, in legal tender and fully documented.
10.8 Working Time	Conformance	Working Time (including Overtime working hours), public holidays and paid annual leave are in compliance with Applicable local Law and industry Standards.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The OH&S Policy is implemented, communicated, and regularly reviewed: <a href="https://rusal.ru/upload/policy/OccupationalSafetyENG.pdf">https://rusal.ru/upload/policy/OccupationalSafetyENG.pdf</a>

CRITERION	RATING	COMMENT
		The implemented Occupational Health and Safety Management System provides the Policy's compliance with the requirements of ISO 45001:2018 Standard.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Policy is applicable to all Workers and Visitors present in any area or activities under the Entity's control. The implemented Occupational Health and Safety Management System provides the Policy's compliance with the requirements of ISO 45001:2018 Standard.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The acting revision of the Policy Statement includes a commitment to comply with all Applicable Laws and regulations of the countries in which the Entity operates, as well as with accepted obligations in occupational safety. The implemented Occupational Health and Safety Management System provides the Policy's compliance with the requirements of ISO 45001:2018 Standard.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The acting revision of the Policy Statement includes a commitment to comply with all Applicable Laws and regulations of the countries in which the Entity operates, as well as with accepted obligations in occupational safety. The implemented Occupational Health and Safety Management System provides the Policy's compliance with the requirements of ISO 45001:2018 Standard.
11.2 OH&S Management System	Conformance	The Entity has a documented Occupational Health and Safety Management System that is in conformance with applicable national and international Standards.
11.3 Employee engagement on health and safety	Conformance	The Entity provides Workers with a range of mechanisms at sites, such as: Joint Health and Safety Committees, the Labour Dispute Commissions, Working Councils, First Stage of Control System by which they can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management.
11.4 OH&S performance	Conformance	The Entity implemented lagging and leading indicators for evaluating its Occupational Health and Safety performance: <a href="https://rusal.ru/en/sustainability/report/">https://rusal.ru/en/sustainability/report/</a> The Entity compares it's OH&S Performance with the OH&S industry data.

**Document Control and Version History**

Revision	Date	Notes
0	20 June 2019	Issued
1	7 November 2019	Update to comments in Criteria 7.1b, 7.2a and 7.2b
2	8 December 2020	Updated to reflect Certification Scope Change with addition of PJSC RUSAL Bratsk, JSC Boguchansk Aluminium Smelter, JSC RUSAL Krasnoyarsk, JSC RUSAL Sayanogorsk and Kubikenborg Aluminium AB.
3	15 July 2021	Surveillance Audit