

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 handwritten signature in black ink, appearing to be 'J. H.', followed by a horizontal line extending to the right.

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

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); Aughinish Alumina (AAL) (Alumina refining, Ireland); RUSAL Kandalaksha (KAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); Sayanal (Semi-fabrication, Russia); Armenal (Semi-fabrication, Armenia).

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); Aughinish Alumina (AAL) (Alumina refining, Ireland); RUSAL Kandalaksha (KAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); Sayanal (Semi-fabrication, Russia); Armenal (Semi-fabrication, Armenia).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Casthouses• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit (20 February – 28 March 2019)• Scope Change Audit (desktop: 20 April – 15 July 2020; on-site 21 September – 1 October 2020)• Surveillance Audit (desktop: 14 – 23 April 2021; on-site: 20 May 2021)• Scope Change Audit (on-site: 26 October – 19 November 2021; desktop 29 November – 1 December 2021)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 20 February – 28 March 2019 (Certification Audit)

-
- 20 April – 15 July 2020 (desktop) and 21 September – 1 October 2020 (on-site) (Scope Change Audit)
 - 14 – 23 April 2021 (desktop) and 20 May 2021 (on-site) (Surveillance Audit)
 - 26 October – 19 November 2021 (on-site) and 29 November – 1 December 2021 (desktop) (Scope Change Audit)

AUDIT REPORT
SUBMISSION

- 21 May 2019 (Certification Audit)
- 11 November 2020 (Scope Change Audit)
- 8 June 2021 (Surveillance Audit)
- 15 December 2021 (Scope Change 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
- Casthouses
- Semi-Fabrication

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
- Casthouses
- Semi-Fabrication

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
- Casthouses
- Semi-Fabrication

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.

Scope Change Audit (on-site: 26 October – 19 November 2021; desktop 29 November – 1 December 2021)

The audit scope included Aughinish Alumina (AAL) (Alumina refining, Ireland); RUSAL Kandalaksha (KAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); Sayanal (Semi-fabrication, Russia); and, Armenal (Semi-fabrication, Armenia).

Supply chain activities included in the audit scope:

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

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

At the time of the audit (October - December 2021), access to the Aughinish Alumina (AAL) site was not possible, due to COVID-19 related travel restrictions. The audit of this site 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, interviews and site observations using teleconferencing capabilities. It is proposed that the Aughinish Alumina (AAL) site will be audited on site as part of the Re-Certification Audit scope.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

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 compliance with Applicable Law. Compliance with Applicable Law is ensured via electronic legal services available for employees, internal audits, 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:</p> <p>https://rusal.ru/en/contacts/#signal</p> <p>The mechanism of Legal Compliance evaluation is also based on the Entity's Management Systems (in accordance with ISO 14001 and 45001). Certificates of these Management Systems can be viewed on a Rusal web-portal:</p> <p>https://rusal.ru/en/clients/product-quality</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 or at the link:</p> <p>https://rusal.ru/en/sustainability/approaches https://rusal.ru/upload/policy/AntiCorruptionENG.pdf</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:</p> <p>https://rusal.ru/sustainability/approaches/corporate-code-of-ethics</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:</p> <p>https://rusal.ru/en/sustainability/approaches</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. Senior Management endorsement is provided via implemented Management Systems in accordance with Standards ISO 9001:2015, 14001:2015 and ISO 45001:2018.</p>

CRITERION	RATING	COMMENT
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: https://rusal.ru/en/sustainability/approaches
2.2 Leadership	Conformance	Senior Management Representatives with overall responsibility and authority to ensure compliance with the requirements of the ASI Performance Standard, are the heads of appropriate Entity's departments.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented the Environmental Management System. The certificates are accessible on the Entity's website: https://rusal.ru/en/clients/product-quality and on the Boguchansk Aluminium Smelter website: https://www.boaz-zavod.ru/about/certificates
2.3b Environmental and Social Management Systems (social)	Conformance	A Social Management System has been established and implemented: https://rusal.ru/en/sustainability/approaches
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 silver medal for the EcoVadis Sustainability Rating 2021 in the Corporate Social Responsibility (CSR) Assessment Report of December 2021.
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	Minor Non-Conformance	The Entity has developed Emergency Response Plans in accordance with Applicable Law and in collaboration with potentially affected Stakeholders groups. The Entity's facilities undertake emergency training on a permanent basis in accordance with legal requirements and risks assessment. For hazardous industrial materials and hydro-technical facilities, special exercises are conducted in cooperation with authorized external bodies. It was revealed during the scope extension audit at one the Entity's facilities that a fire exit in the administrative building does not comply with the requirements of the Russian Federation Fire Safety

CRITERION	RATING	COMMENT
		rules. The fire exits all other facilities, buildings and premises at this site are equipped properly.
2.7 Mergers and Acquisitions	Conformance	Mergers and acquisitions are undertaken in accordance 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 that provides reliable, verified information, which discloses the governance approach and all material environmental, social and economic impacts. The Report is accessible on the website: https://rusal.ru/en/sustainability/report
3.2 Non-compliance and liabilities	Conformance	Where Applicable Law requires or allows, information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law, is publicly disclosed. Information on any non-monetary penalties imposed by the Russian state authorities is publicly accessible in accordance with Russian Federation law.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity facilitates, or has made on its behalf, payments to governments on a legal and contractual basis. All payments are recorded via 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 Governments in the Company Annual Report, which is accessible on the website: https://rusal.ru/en/investors/financial-stat/annual-reports
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented an effective Complaints Resolution Mechanism for the tracking and management of all Stakeholder (external and internal) complaints, grievances and requests.
PRINCIPLE 4 MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The 'cradle-to-gate' assessment includes consideration of the products life cycle from bauxite ore extraction through to the 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 demonstrates existing public access to the Life Cycle Assessment (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 end products.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity recycles 100% of Aluminium Scrap, including scrap of aluminium alloys generated within its own operations.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented 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. The strategy includes a 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 of the 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 the Sustainability Report: https://rusal.ru/en/sustainability/report

CRITERION	RATING	COMMENT
		Calculations of the Entity's GHG emissions and the carbon footprint of Aluminium are verified by independent auditing firms.
5.2 GHG emissions reductions	Conformance	The Entity sets strategic goals to reduce climate impacts. The goals are communicated to the general public via Annual Reports accessible on the Entity's website: https://rusal.ru/en/sustainability/report
5.3a Aluminium Smelting (management system)	Conformance	The Entity demonstrates the implementation of a Management System, evaluation procedures, and operating controls to limit the Direct GHG Emissions. The greenhouse gas (GHG) emissions calculations are undertaken on an annual basis and verified by independent auditing firms. The common information about the system is in the UC Rusal Sustainability Report, section titled 'Climate Change': https://rusal.ru/en/sustainability/report
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity demonstrates average Direct and Indirect GHG Emissions (Scope 1 and Scope 2) from each smelter within the Certification Scope, are below 8 tonnes CO ₂ -eq per metric tonne of Aluminium. The majority 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: https://rusal.ru/en/press-center/press-releases/rusal_is_recognized_as_global_leader_by_carbon_disclosure_project_cdp/?sphrase_id=9357
5.3c Aluminium Smelting (after 2020)	Not Applicable	Within the Certification Scope, there are no plans to construct and commission 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 as required. 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, as required. Information is disclosed in the Sustainability Report. However, at one of the smelters, the action plan to minimize adverse impacts to water, has not been documented. However, the issue is being managed and is under control.

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The assessment of major risk areas of operations with potential Spills and Leakages with a contamination of air, water and/or soil, are undertaken.
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: https://rusal.ru/en/sustainability/report
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, as required.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated Waste disposal methods in the Sustainability Report: https://rusal.ru/en/sustainability/report
6.6a Bauxite Residue (storage construction)	Conformance	Water circulation drainage systems are implemented and in operation at 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 technical specialists.
6.6c Bauxite Residue (water discharge)	Conformance	At Bauxite Residue storages, the water circulation drainage systems (with zero discharge) are implemented and operational.
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	The Entity does not discharge Bauxite Residue to marine and aquatic environments.

CRITERION	RATING	COMMENT
6.6e Bauxite Residue (state 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.
6.6f Bauxite Residue (remediation)	Conformance	In case of Bauxite Residue area closure planning processes, 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 aims to minimize volume of SPL generation by increasing service life of SPL (period between pot relining). Carbon materials from SPL is transferred to specialized licensed organizations for recycling. Refractory materials from SPL are partially 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. Refractory from SPL is partially transferred to specialized organizations, but predominantly 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 however, Dross is stored outside and in volumes in contravention of the environmental permit. The issue is under control and the Facility has implemented actions to transfer the

CRITERION	RATING	COMMENT
		entire 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).
PRINCIPLE 7 WATER STEWARDSHIP		
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	<p>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 implemented via 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.</p>
7.2b Water management (monitoring)	Not Applicable	<p>This Criterion is not applicable, because there were no material Water-related Risks in Watersheds in the Entity's Area of Influence. 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.</p>

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	As part of its annual Sustainability Reporting, the Entity discloses the information on water withdrawal and use: https://rusal.ru/en/sustainability/report
PRINCIPLE 8 BIODIVERSITY		
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 research activities and biodiversity monitoring in cooperation with research organizations. The activities 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 has undertaken a risk assessment, which is a part of the risk assessment of biodiversity and materiality of the impact on biodiversity. Packaging timber 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 undertake activities, including exploration activities in the locations of World Heritage sites.
8.5a Mine rehabilitation (best available techniques)	Conformance	Mine closure is not planned in the near future. If and when a decision to close a mining operation, 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.

CRITERION	RATING	COMMENT
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has developed and implemented Policies that reflect commitments to respect Human Rights in accordance with the UN Guiding Principles on Business and Human Rights: https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf
9.1b Human Rights Due Diligence (process)	Conformance	A Human Rights Due Diligence process addresses actual and potential impacts on the rights. The Human Rights Due Diligence process includes a Human Rights Impact Assessment and considers complaints, grievances and requests received via the Complaints Resolution Mechanisms. The Entity has a process in place to address identified Human Rights-related inconsistencies.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has implemented processes for remediation of adverse Human Rights impacts as required: https://rusal.ru/en/contacts/#signal
9.2 Women's Rights	Conformance	The Entity has developed and implemented a Human Rights Policy based on the recommendations of international Standards, including the Committee on the Elimination of Discrimination against Women (CEDAW), which is accessible on the website: https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf 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	A review of available 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	A review of available 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	A review of available 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	During project development activities, the Entity takes into consideration the issues of resettlement in

CRITERION	RATING	COMMENT
		<p>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.</p>
9.6b Resettlements (where unavoidable)	Not Applicable	<p>During project development activities, the Entity takes into consideration the issues of resettlements in accordance with Applicable Law requirements. No relocations or resettlements are planned for the foreseeable future. There have been no resettlements for the Entity's Certification Scope, since its ASI Membership.</p>
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: https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</p> <p>No issues affecting Local Communities have been identified during the Human Rights Due Diligence assessment. The Entity's activities do not impact interests of local Communities on their lands and livelihoods. The Entity has a process for engaging with Local Communities, explore opportunities to support local Communities' livelihoods and interests even if no adverse impact has been identified. One example includes the building of infrastructure for the local Community such as medical centres (including for patients with COVID-19), kindergartens and houses.</p>
9.7b Local Communities (impacts)	Conformance	<p>No issues affecting local Communities were identified during the Human Rights Due Diligence. 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.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>No issues affecting local Communities were identified during the Human Rights Due Diligence. 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</p>

CRITERION	RATING	COMMENT
		Communities' livelihoods and interests even if no adverse impacts were identified.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity does not contribute to nor does not promote armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The Entity also 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 finance violence in countries where such minerals are extracted.
9.9 Security practice	Conformance	The Entity ensures respect for Human Rights when engaging 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 Freedom of Association via the Right to Collective Bargaining. The Entity's Human Rights Policy is accessible on the website: https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf
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, nor support Human Trafficking either directly, or through any employment or recruitment agencies. These documents are available at the following links: https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics
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,

CRITERION	RATING	COMMENT
		<p>or through employment or recruitment agencies. These documents are available at: https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics</p>
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: https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics</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: https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics</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: https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics</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: https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics</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</p>

CRITERION	RATING	COMMENT
		<p>accordance with the legislation requirements. These documents are available at:</p> <p>https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</p> <p>https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics</p>
10.4 Non-Discrimination	Conformance	<p>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:</p> <p>https://rusal.ru/upload/policy/Human_Rights_Policy_ENG.pdf</p> <p>https://rusal.ru/en/sustainability/approaches/corporate-code-of-ethics</p>
10.5 Communication and engagement	Conformance	<p>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.</p>
10.6 Disciplinary practices	Conformance	<p>No cases of corporal punishment use, mental or physical coercion, harassment, and gender-based violence, including sexual harassment, or verbal abuse of Workers have been identified.</p>
10.7a Remuneration (living wage)	Conformance	<p>Remuneration throughout 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.</p>
10.7b Remuneration (method of payment)	Conformance	<p>Wage payments are undertaken in a timely manner, in legal tender and are fully documented.</p>
10.8 Working Time	Conformance	<p>Working Time (including Overtime working hours), public holidays and paid annual leave are provided for in compliance with Applicable local Law and industry Standards.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The OH&S Policy is implemented, communicated, and regularly reviewed:</p> <p>https://rusal.ru/upload/policy/OccupationalSafetyENG.pdf</p> <p>The implemented Occupational Health and Safety Management System provides the Policy's</p>

CRITERION	RATING	COMMENT
		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 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 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	<p>The Entity provides Workers with a range of mechanisms, such as: Joint Health and Safety Committees, Labor Dispute Commissions, Working Councils, and First Stage of Control System by which they can raise, discuss, and participate in the resolution of Occupational Health and Safety issues with management.</p> <p>The program 'Look Around' has been implemented in the Rusal Downstream Division in 2020 (CJSK RUSAL Sayanal and JSK RUSAL Armenal). The program provides more effective employee engagement on health and safety by an easier interface and availability and addressing of findings directly to a responsible authority. This program complements other similar RUSAL mechanisms, mentioned above, and increases their total effectiveness.</p>

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	The Entity has implemented lagging and leading indicators for evaluating its Occupational Health and Safety performance: https://rusal.ru/en/sustainability/report/ 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
4	17 January 2022	Scope Change Audit - Certification Scope updated to include sites Aughinish Alumina (AAL), RUSAL Kandalaksha (KAZ), Sayanal and Armenal.