
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

UACJ CORPORATION

CERTIFICATE
NUMBER

178

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

ERM
CERTIFICATION
AND
VERIFICATION
SERVICES

DATE OF ISSUE

5 JANUARY 2023

DATE OF EXPIRY

4 JANUARY 2026

CERTIFIED SINCE

14 FEBRUARY 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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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

Manufacture of aluminium plate products at Fukui Works, Japan and UACJ (Thailand) Co., Ltd., Thailand.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	UACJ Corporation
ENTITY NAME	UACJ Corporation
CERTIFICATION SCOPE	Manufacture of aluminium plate products at Fukui Works, Japan and UACJ (Thailand) Co., Ltd., Thailand.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (25 October – 5 November 2021)Re-Certification Audit (3 – 16 August 2022)
AUDIT FIRM	ERM Certification and Verification Services
AUDIT DATE	<ul style="list-style-type: none">25 October – 5 November 2021 (Initial Certification Audit)3 – 16 August 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">19 January 2022 (Initial Certification Audit)20 December 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (25 October – 5 November 2021)</u></p> <p>The audit scope covers the manufacture of aluminium plate products at Fukui Works, Japan and UACJ (Thailand) Co., Ltd., Thailand.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (October – November 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been</p>

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.

Re-Certification Audit (3 – 16 August 2022)

The audit scope covers the manufacture of aluminium plate products at Fukui Works, Japan and UACJ (Thailand) Co., Ltd., Thailand.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion (Production and Transformation)

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

AUDIT
OUTCOME

Full 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

5 January 2023 – 4 January 2026

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

4 January 2026

CERTIFICATE
NUMBER

178

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has established departmental responsibility to comply with related laws and regulations. Legal requirements and required qualification lists are systematically maintained and updated for environment and safety and health. For the Fukui Works site the social requirements are being finalised and will be implemented by early 2023.</p> <p>External contracts exist to ensure health, safety and environmental (HSE) legal changes are identified and UACJ Thailand similarly keeps up to date with changes in social and human rights law. The Entity plans to introduce its Law Management Rules that establish responsibilities and a renewal period for updating of new requirements across HSE, labour and human rights and business integrity from January 2022.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established a Group Code of Conduct, a Group Anti-Bribery Regulations, and Global Guidelines on Bribery. Training on the Code of Conduct and Anti-Bribery is provided to new employees and annual refresher training is provided to all employees (although delayed during 2021 due to COVID restrictions). Relevant records are maintained. The Entity has established a third party list register to record gifts for charitable contributions.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has established a Group Code of Conduct, a Group Anti-Bribery Regulations, and Global Guidelines on Bribery. Training on the Code of Conduct and Anti-Bribery is provided to new employees and annual refresher training to all employees (although delayed during 2021 due to COVID restrictions). Relevant records are maintained.</p> <p>The Entity has established a third party list register to record gifts for charitable contributions.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented Policies consistent with environmental, social, and governance practices included in the ASI Performance Standard. Group-wide regulation is adhered to at both sites with links on respective websites to governance requirements. The stand-alone policies and Group Code of Conduct are endorsed and responsibilities assigned at site</p>

CRITERION	RATING	COMMENT
		level. The HSE policies are incorporated within the HSE Management System, signed and up to date.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented Policies consistent with environmental, social, and governance practices included in the ASI Performance Standard. Group-wide regulation is adhered to at both sites with links on respective websites to governance requirements. The stand-alone policies and Group Code of Conduct are endorsed at Senior Management level and responsibilities assigned at site level. The HSE policies are incorporated within the HSE Management System, signed and up to date.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates its relevant Occupational Health and Safety (OHS) Policy, Environmental Policy and President Policy on Information Boards in offices and production areas and are made available on the website: https://uath.uacj-group.com/policy.html#safety_policy New employees undertake induction training that includes this Policy. The President Policy sets out the Entity's philosophy for production and is available on the homepage and external website.
2.2 Leadership	Conformance	The Entity has established the organizational structure and nominates roles for senior Management Representative with responsibility and authority for conformance with the requirements of the ASI Performance Standard. ASI Certification Management Rules have been developed and internal training has been conducted.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented an Environmental Management System that is certified to ISO 14001 and there are current plans for ISO 45001 certification. At both sites there are open non-conformities from the latest external ISO 14001:2015 Surveillance Audits, for which acceptable corrective and preventive actions have been defined.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Corporate Governance, Human Resources and General Affairs Departments are working individually for social risk management. Labour Rights fall under the Human Resources Department and detail is described in Collective Agreements and work regulations, based on the Entity's Group Code of Conduct.</p> <p>A Social Management Committee is established at the Fukui Works site and procedures are being defined for implementation and integration over time. The UACJ Thailand site has in place a labour protection MBO (Management By Order) and a PDCA (Plan Do Check Act) framework that addresses Code of Conduct compliance, MBO, OHS, Welfare Committee, Employment rules, Working hours and Retention rate.</p> <p>The Entity is currently formalising its existing Social Management System.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has developed and implemented a responsible sourcing Policy covering environmental, social and governance issues through its CSR Deployment Guideline for Suppliers, publicly available on the website (last reviewed in June 2021). Suppliers must sign the document and follow its guidance. Major suppliers are assessed against criteria via a self-assessment.</p> <p>For the UACJ Thailand site, a CSR Guideline was introduced from September 2021 which is shared with suppliers and signed as part of procurement. An additional supplier questionnaire process is deployed that addresses the CSR Guideline criteria.</p> <p>The Entity conducts supplier evaluations annually with its main suppliers and any non-conformance with the Entity's requirements are actioned.</p>
2.5 Impact Assessments	Conformance	<p>There have been no major projects requiring Impact Assessment at the Fukui Works and UACJ Thailand sites since 2012 and 2017 respectively. A Management of Change Procedure determines the need for environmental Impact Assessment and provides an opportunity to include Human Rights assessment in this process. Due Diligence includes Human Rights assessment and community need in the event of significant change. A Human Rights assessment is undertaken every three years across operations/activities and more specifically if required however no such examples for specific needs exist to date.</p>

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	<p>Emergency Response Plans are available for fire/explosion, earthquake/tsunami, natural disasters (typhoons, floods, etc.) and chemical substance leakage scenarios. Periodical response training has been conducted. For chemical substance leakage, the impacts were assessed based on significant environmental impacts, following ISO 14001 and operational controls are implemented. The impacts have been assessed, from an occupational safety (i.e. exposure of operator) or process safety (i.e. fire/explosion) point of view and the risks of personnel exposure and fire/explosion are systematically addressed.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity's Group procedure for Mergers, Closure and Commissioning, together with the EHS Assessments of Prospective Mergers, Acquisitions and Divestitures Procedure outlines criteria to be followed and the Due Diligence process to be applied.</p> <p>Mergers and acquisitions, closure and decommissioning activity is managed by the Corporate Strategic Department and adheres to an undocumented process that considers the reported risk levels and summarises information for Board decision making. A summary document is prepared with different departmental approvals of due diligence results and an associated action plan to be followed to mitigate risks.</p> <p>There are no immediate plans for further merger and acquisition activity at Fukui Works. There has been no merger and acquisition or closure/other activity for UACJ Thailand since it opened in 2014.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity's Group procedure for Mergers, Closure and Commissioning, together with the EHS Assessments of Prospective Mergers, Acquisitions and Divestitures Procedure outlines criteria to be followed and the Due Diligence process to be applied.</p> <p>Mergers and acquisitions, closure and decommissioning activity is managed by the Corporate Strategic Department and adheres to a process that considers the reported risk levels and summarises information for Board decision making. A summary document is prepared with different departmental approvals of due diligence results and an associated action plan to be followed to mitigate risks, in support of a decision to proceed.</p> <p>There are no immediate plans for further merger and acquisition activity at Fukui Works. There has been</p>

CRITERION	RATING	COMMENT
		no merger and acquisition or closure/other activity for UACJ Thailand since it opened in 2014.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity's Group Integrated Report for 2020 was published in September 2021 with an April 2020 to March 2021 reporting period in line with its financial accounting period. The Report discloses the Entity's governance approach and its material environmental, social and economic impacts. It also includes a statement regarding any breaches that might result in significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law: https://www.uacj.co.jp/english/ir/library/pdf/2021/full_2021uacjr.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity's Group Integrated Report for 2020 was published in September 2021 with an April 2020 to March 2021 reporting period in line with its financial accounting period. The Report discloses the Entity's governance approach and its material environmental, social and economic impacts. It also includes a statement regarding any breaches that might result in significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law.
3.3a Payments to governments (legal and contractual)	Conformance	National laws prohibit payments to government officials with reviews undertaken by an independent body. The independent financial accounting audit includes payments to governments in its annual audit scope. The Entity's Group Anti-Corruption Policy is reviewed twice per year and signed off at Board level.
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 established accessible, transparent, understandable and culturally and gender sensitive, Complaints Resolution Mechanisms to address stakeholder complaints, grievances and requests for information relating to its operations. There is a contact point for receiving complaints from interested parties on the Entity's website. The General Affairs Department responds to received complaints and maintains a grievance register.
PRINCIPLE 4 MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Fukui Works site has participated with the Japan Aluminum Association (JAA) in development of a Life Cycle Assessment (LCA) across six aluminium companies in Japan, using data from the production processes (published on the JAA website). The defined boundary excludes ingots, scrap and sheet product, however more than 80% of product falls within the Life Cycle Inventory (LCI) boundary. The LCA, published in 2000 and revised in 2006, includes consolidated average energy data as the baseline and this baseline data reflects current processes. Also, the LCI approach has taken an End of Life or Recycled Content approach.</p> <p>The UACJ Thailand site designs a number of products and has completed an LCA on its stock. The LCA takes a cradle-to-gate approach.</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>Adequate cradle-to-gate Life Cycle Assessment (LCA) information on the Entity's Aluminium (containing) products is available.</p> <p>The LCA report published by the Japan Aluminum Association (JAA) to provide consolidated energy data based on the production processes of six aluminium companies in Japan is made available and does include a cradle-to-gate approach.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The LCA report published by the Japan Aluminum Association (JAA) to provide consolidated energy data based on the production processes of six aluminium companies in Japan, including the Fukui Works site is made available.</p> <p>A cradle-to-gate LCA for a number of products at the UACJ Thailand site is currently being completed and whilst at this stage information is confidential, limited customer responses are available upon request.</p>
4.2 Product design	Conformance	<p>The Entity establishes objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the end product. The Fukui Works site has an objective to increase the ratio of recycled material in product with monthly improvement targets, backed up by corporate level KPIs. The Aluminium Promotion Working Group and the Recycle Promotion Group have implemented objectives to develop SMART branded products, generate new demand through materials replacement and create a recycling system for customer waste. The UACJ Thailand site has established product design goals to quantify potential environmental impacts of aluminium alloy coil.</p>

CRITERION	RATING	COMMENT
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity's Environmental Policy outlines that waste is to be reduced across all activity areas. The material flow diagrams quantify the separate streams for collection and recycling/reuse, which is supported by monitoring data against strategy targets. Aluminium Process Scrap collection, recycling and/or reuse is targeted at 100% and there is also an external scrap supply, forming part of the raw material as well as prime ingot. The Entity's 2021-23 action plan establishes an overall target of 85% recycled content by 2030.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity's material flow diagrams quantify the separate streams for collection and recycling/reuse, which is supported by monitoring data against strategy targets. Aluminium Process Scrap collection, recycling and/or re-use is targeted at 100% and this relies on effective separation of aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity implements a recycling strategy, including specific timelines, activities and targets. The recycling strategy is based on best available information as there are a number of external variables applicable, primarily the availability of external scrap. The 2021-23 action plan for the UACJ Thailand site has established a goal to increase the recycled content to 85% for can products by 2030. An overall objective for the Entity is to increase the ratio of recycled material in product, for which monthly targets are set, towards 88% by 2030.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity engages with local, regional and national collection and recycling systems to support accurate measurement and efforts to increase recycling rates for products containing Aluminium. The Entity is a member of, and provides a secondee to, the 'Can to Can' initiative, a multi-stakeholder group to further understanding in the recyclability of aluminium cans for closed loop systems. The Entity works closely with high profile customers on closed loop recycle systems, to return aluminium waste to the processing chain. The UACJ Thailand site implements a packaging action plan where it engages with partners and suppliers to improve the market approach and customer-specific recycling and collection capacity in Thailand, including support for local authorities in reducing packaging waste.

CRITERION	RATING	COMMENT
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity publishes GHG data on their website and in the annual Integrated Report, Investor Relations section:</p> <p>https://www.uacj.co.jp/english/csr/index.htm https://www.uacj.co.jp/english/ir/library/factbook.htm</p> <p>The Entity submits carbon dioxide emission data to the Carbon Disclosure Project (CDP).</p> <p>The UACJ Thailand site certified its carbon footprint under the Thailand Greenhouse Gas Management Organization Guidance in 2021 and has a GHG emissions inventory to record Scope 1, Scope 2 and specific Scope 3 emissions, consolidated in the UACJ Group GHG (CO₂) emissions data and energy use reporting.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has a carbon dioxide emissions reduction target, described in the UACJ Vision 2030. The target is 22% reduction of carbon dioxide emission across the whole supply chain by 2030 compared with 2019. The Climate Change Countermeasures Promotion Committee creates an annual reduction plan including specific reduction actions and monitors energy consumption and direct and indirect carbon dioxide emission.</p> <p>The UACJ Thailand submits an annual energy management report to the Department of Energy Development and Efficiency (DEDE) as required under the national regulation. The report includes energy conservation policies, target, plans and measures.</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>The Entity has developed comprehensive procedures to quantify and report Emissions to Air with the potential to have adverse effects on humans or the environment. This includes process related emissions and ambient air quality parameters, usually based on initial impact assessment studies. Reporting of emissions monitoring data to regulatory bodies is specific and regular. Mitigation plans and measures are in place to minimise potentially</p>

CRITERION	RATING	COMMENT
		adverse impacts that could arise through elevated air emissions that exceed permitted threshold limits.
6.2 Discharges to Water	Conformance	The Entity quantifies and reports Discharges to Water with the potential to have adverse effects on humans or the environment. This includes process related water discharges and site and storm water run-off which are typically based on initial impact assessment studies. Reporting of water discharges monitoring data to regulatory bodies is specific and undertaken regularly. Mitigation plans and measures are in place to minimise potentially adverse impacts that could arise through elevated discharge levels of parameters of concern that exceed permitted threshold limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity conducts assessment of major risk areas where Spills and Leakage of hazardous substances including liquids and gases may contaminate air, water and/or soil. Monitoring procedures exist to prevent release and emergency scenarios for which an emergency response plan is in place to minimize resulting impact. Prevention and control measures for chemical storage includes the regular inspection of chemical storage areas for Spills and Leakage, floor condition, spill kits and chemical container integrity checking.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity conducts assessment of major risk areas where Spills and Leakage of hazardous substances including liquids and gases may contaminate air, water and/or soil. Monitoring procedures exist to prevent release and emergency scenarios for which an emergency response plan is in place to minimize resulting impact. Prevention and control measures for chemical storage includes the regular inspection of chemical storage areas for Spills and Leakage, floor condition, spill kits and chemical container integrity checking.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity implements a process to disclose to affected parties the volume, type and potential impact of any significant Spill following such an incident. Emergency Response Plans for Spills and Leakage of hazardous chemical substances are established and include the contact details of affected parties, including local authorities. In case of incidental release of hazardous chemical substances, it is regulated to report the released substance and quantity to the affected parties. It is currently a requirement in the Entity's established

CRITERION	RATING	COMMENT
		process to report on the potential impact of such a release.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity implements a process for disclosing to affected parties the event of any Spill and the remediation actions taken. This includes minor exceedances of agreed emissions threshold limits with regulatory authorities (which are published on the Sustainability pages of the Entity's website). The Entity has Emergency Management Plans with emergency contacts and response teams in place for communication as well as remediation activities (if required). Spill incident reporting includes the location and nature of the incident, type and volume of chemicals/hazardous substance, action taken and prevention measures.
6.5a Waste management and reporting (strategy)	Conformance	The Entity implements a waste management strategy with a '5R' Waste Mitigation Hierarchy, addressing waste classification, waste separation and handling, waste accumulation, transportation and disposal, and reporting. The Entity implements waste reduction policies and action plans at site level. The annual waste reduction target is one of the key performance indicators monitored monthly at environment management reviews and is monitored at monthly committee meetings.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has established a process to publicly disclose on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated and the associated Waste management options and disposal methods. Data on final waste for disposal is legally required to be reported to the relevant authority. This is undertaken by various means including electronic manifest system and conventional reporting. Consolidated waste information, including data on quantity and disposal methods (recycled and landfill) is disclosed on the Entity's Group webpage: https://www.uacj.co.jp/english/csr/environment/emission.htm Both Hazardous and Non-Hazardous waste types are reported.
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.

CRITERION	RATING	COMMENT
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 (state 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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity has implemented processes aimed to maximise the recovery and reuse/recycling of Dross generated from melting furnaces and other equipment. The draw down ratio of the primary recovery is approximately 50% for one of the sites and 40% for the other site. Further secondary recovery both on site and by external providers delivers a recovery rate of 30 to 35%. Full records are kept and the Entity is investigating options to increase the on-site recovery rate and reduce the volume of Dross waste generated.
6.8b Dross (recycling)	Conformance	The Entity has implemented processes aimed to maximise the recovery and reuse/recycling of Dross generated from melting furnaces and other equipment. The draw down ratio of the primary recovery is approximately 50% for one of the sites and 40% for the other site. Further secondary recovery both on site and by external providers delivers a recovery rate of 30 to 35%. Full records are kept and the Entity is investigating options to increase the on-site recovery rate and reduce the volume of dross waste generated.

CRITERION	RATING	COMMENT
6.8c Dross (review of alternatives)	Conformance	The Entity is a member of the Dross Committee at the Japan Aluminum Association and the Up-Cycle Study Group on Aluminum Manufacturing By-products at the Institute of Light Metals, which has been investigating technical solutions to reduce the landfill quantity of Dross residues.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity identifies and maps its water source and withdrawals and use via a Water Inventory Map and water/wastewater flow diagrams, which identifies water sources and water consumption facilities, including both process and sanitary water.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed the water-related risks in Watersheds in its Area of Influence. At one site water use accounts for 10% of total industrial water supply and about 5% of total potable water supply. For the other site water use accounts for 1% of total industrial water use. Both locations are relatively water rich with no risks identified through water risk assessments.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable, as no material risks were identified in the water risk assessment. However, the Entity understands the importance of water management planning for sustainability and various initiatives have been implemented to measure and reduce water consumption.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, as no material risks were identified in the water risk assessment. However, the Entity understands the importance of water management planning for sustainability and various initiatives have been implemented to measure and reduce water consumption.
7.3 Disclosure of water usage and risks	Conformance	The Entity consolidates and reports its total water withdrawal and use, and its water-related risks as part of the Entity's Group Fiscal Year reporting and makes this available on the website, under the Resource Conservation and Waste Reduction section: https://www.uacj.co.jp/english/csr/environment/emission.htm
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in the Entity's Areas of Influence. External

CRITERION	RATING	COMMENT
		advisory companies have supported the biodiversity assessments with specialist knowledge. The Entity is not located in a key biodiversity area; negative impacts to the biodiversity were not identified by the assessments and negative impacts due to the activities at the Entity have not been identified.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable, as the Entity is not located in a key biodiversity area and does not pose a material risk to local biodiversity, as determined by the biodiversity assessment.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable, as the Entity is not located in a key biodiversity area and does not pose a material risk to local biodiversity, as determined by the biodiversity assessment
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable, as the Entity is not located in a key biodiversity area and does not pose a material risk to local biodiversity, as determined by the biodiversity assessment. However, the Entity publishes biodiversity outcomes on its website: https://www.uacj.co.jp/english/csr/environment/biodiversity.htm At Group level, the Environment Management Manual requires publication of biodiversity study outcomes and impacts. There has been localised reporting as a result of wider environmental impact assessment feedback to the community.
8.3 Alien Species	Conformance	The Entity has an Alien Species Damage Prevention Procedure to establish prevention measures for the accidental or deliberate introduction of Alien Species, by source and transferred materials. The highest invasion risk of Alien Species is recognised at both sites although no documented risk evaluation to identify potential vectors though the Entity's activities and operations exists for this.
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 mines)	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.

CRITERION	RATING	COMMENT
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 respects Human Rights and has implemented a Human Rights Policy and has provided training. The Entity's Human Rights position and commitments are made and referred to in the Group Code of Conduct.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Human Rights Due Diligence process that is supported by an internal due diligence procedure which ensures consistency across sites. To date, the Entity has not identified adverse Human Rights impacts that it may have caused or contributed to.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has implemented a Human Rights Due Diligence process that is supported by an internal due diligence procedure which ensures consistency across sites. To date, the Entity has not identified adverse Human Rights impacts that it may have caused or contributed to.
9.2 Women's Rights	Conformance	The Entity recognises and respects the rights and interests of women, consistent with international standards, and has implemented a Policy with specific process on women's rights.
9.3 Indigenous Peoples	Not Applicable	The Entity is located within industrial areas or on the city fringe where Indigenous populations are not present. As such, it is not necessary for the Entity to develop policies or processes to ensure respect for the rights and interests of Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	The Entity is located within industrial areas or on the city fringe where Indigenous populations are not present. As such, it is not necessary for the Entity to develop policies or processes to address impacts on the Indigenous Peoples associated culturally with or living on those relevant lands.
9.5 Cultural and sacred heritage	Not Applicable	The Entity is located within industrial areas or on the city fringe where Indigenous populations are not present. As such, it is not necessary for the Entity to develop policies or processes to address impacts on the Indigenous Peoples associated culturally with or living on those relevant lands, or to cooperatively identify sacred or cultural heritage sites and values within the Entity's Area of Influence.

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9.6a Resettlements (avoid or minimise)	Not Applicable	The Entity does not occupy locations where relocation or Resettlement has been necessary in the establishment of operations. There are no Indigenous Peoples or Indigenous Peoples' lands, territories or resources to the extent that the Entity's business activities affect it.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity does not occupy locations where relocation or Resettlement has been necessary in the establishment of operations. There are no Indigenous Peoples or Indigenous Peoples' lands, territories or resources to the extent that the Entity's business activities affect it.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the rights and concerns of the Local Communities and identifies these as part of its Human Rights Due Diligence process and in its use of the evaluation tool. No significant issues or risks have been currently identified.
9.7b Local Communities (impacts)	Conformance	The Entity respects the rights and concerns of the Local Communities and identifies these as part of its Human Rights Due Diligence process and in its use of the evaluation tool. No significant issues or risks are currently identified.
9.7c Local Communities (livelihoods)	Conformance	The Entity respects the rights and the concerns of the Local Communities and identifies these as part of its Human Rights Due Diligence process and in its use of the evaluation tool. No significant issues or risks are currently identified. Dialogue with the Community has led to local initiatives such as environment clean up and tree planting events, and support for disabled persons.
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	High-risk areas are identified and summarized in a risk table and the Entity does not operate in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity in its involvement with public and private security providers, respects Human Rights according to recognised standards and good practices.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference. At the Fukui Works site, a Union exists for which there is both a voluntary and high level of membership. At the UACJ Thailand site, no Labour

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		Union exists however a welfare committee is established as a legal requirement.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to Collective Bargaining and the bargaining agreements that result. At the Fukui Works site, a Union exists for which there is a voluntary and high level of membership. At the UACJ Thailand site, no Labour Union exists however a welfare committee is established as a legal requirement.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity is not located in countries where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity does not use or support the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law, stipulating in both locations that children under 15 years will not be employed. The Entity's Working Regulation stipulates that no hiring below 18 years of age can take place.
10.2b Child Labour (hazardous)	Conformance	The Entity does not use or support the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law, stipulating in both locations that children under 15 years will not be employed. The Entity's Working Regulation stipulates that no hiring below 18 years of age can take place.
10.2c Child Labour (worst forms)	Conformance	The Entity does not use or support the use of Child Labour as defined in ILO Conventions C138 and C182, and complies with related national and international law, stipulating in both locations that children under 15 years will not be employed. The Entity's Working Regulation stipulates that no hiring below 18 years of age can take place.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not engage in nor support Human Trafficking in any way, require deposits, bonds or identity papers for employment in return, restrict freedom of movement or the right to terminate employment.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention,

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		and C105. The Entity does not engage in nor support Human Trafficking in any way, require deposits, bonds or identity papers for employment in return, restrict freedom of movement or the right to terminate employment.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not engage in nor support Human Trafficking in any way, require deposits, bonds or identity papers for employment in return, restrict freedom of movement or the right to terminate employment.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not engage in nor support Human Trafficking in any way, require deposits, bonds or identity papers for employment in return, restrict freedom of movement or the right to terminate employment.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not engage in nor support Human Trafficking in any way, require deposits, bonds or identity papers for employment in return, restrict freedom of movement or the right to terminate employment.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not engage in nor support Human Trafficking in any way, require deposits, bonds or identity papers for employment in return, restrict freedom of movement or the right to terminate employment.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not engage in nor support Human Trafficking in any way, require deposits, bonds or identity papers for employment in return, restrict freedom of movement or the right to terminate employment.

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10.4 Non-Discrimination	Conformance	The Entity has implemented measures to ensure that equal opportunities are made available and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement or termination of Workers on the basis of common discrimination criteria.
10.5 Communication and engagement	Conformance	The Entity has implemented mechanisms for direct engagement with Workers and their representatives regarding workplace and labour conditions and resolution of such issues, including anonymous whistleblowing.
10.6 Disciplinary practices	Conformance	The use of corporal punishment, mental or physical coercion, harassment and gender-based violence is not supported in any way and is addressed in the Entity's Code of Conduct and Work Rules.
10.7a Remuneration (living wage)	Conformance	The Entity has implemented systems for calculating remuneration that respects the rights of Workers to a living wage. Workers are paid for a normal working week that meets or exceeds the legal and industry minimum standard, that meets basic needs plus some discretionary income. Wage payments are fully documented and paid directly via bank transfer on a monthly basis.
10.7b Remuneration (method of payment)	Conformance	The Entity has implemented systems for calculating remuneration that respects the rights of Workers to a living wage. Workers are paid for a normal working week that meets or exceeds the legal and industry minimum standard, that meets basic needs plus some discretionary income. Wage payments are fully documented and paid directly via bank transfer on a monthly basis.
10.8 Working Time	Conformance	The Entity has implemented for each Worker an employee contract and employee letter of engagement that collectively includes the Labour Rights afforded to the individual and employment conditions addressing the working week, overtime salary, annual leave, public holidays and notice period, according to the Applicable Law in each country.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has an Occupational Health and Safety (OH&S) Philosophy and Policy, signed at Executive level and published on both its public and site-specific web locations. The Policy is subject to

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		regular review and following a change at Corporate/Group or Management System level.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Occupational Health and Safety Policy applies to all Workers and Visitors who must apply the Entity's OH&S rules and relevant procedures for suppliers or contractors, developed based on the site OH&S Policy. The OH&S rules are described in the Safety Handbook which is provided to all Workers and Safety and Environmental Rules are provided to suppliers for acknowledgement during procurement. Other Visitors to the Entity are instructed in OH&S rules upon arrival.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's OH&S Policy includes a statement to comply with Applicable Law and other obligations regarding OHS. The Entity has developed an OHS legal register for each of the sites which is updated and legal requirements are incorporated into Standard Operational Procedures.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The safety of employees is emphasised in the Group Code of Conduct and the OH&S Policy. Risk assessment and chemical safety assessments are conducted for all work activities and a Permit to Work system is implemented to ensure safe deployment.
11.2 OH&S Management System	Conformance	The Entity has developed and implemented a documented Occupational Health and Safety (OH&S) Management System that aligns in structure and content with applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	The Entity has provided Workers with a mechanism by which they can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. An Occupational Health and Safety (OHS) Committee is present at each site which includes broad employee representation. OHS Committee meetings are conducted monthly with an agenda that includes all OHS incidents, trends and issues of concern. The Entity also has other processes for Workers to raise health and safety risk issues such as a safety group and a Safety Concern Form. All issues are subject to investigation by the OHS Department.
11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance using a range of metrics including Group-wide lagging and leading indicators, and compares this across UACJ sites globally and

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		best practices generally. The OH&S Management System is not certified to ISO 45001 but continuous improvement is a working ethos. Safety performance is reviewed monthly during the OHS Committee meetings and biannually during the UACJ Group OHS management review.

Document Control and Version History

Revision	Date	Notes
0	14 February 2022	Initial Certification Audit - Provisional Certification
1	16 March 2022	Text amendment to correct facility name to UACJ (Thailand) Co., Ltd.
2	5 January 2022	Re-Certification Audit – Full Certification Criterion 9.7a, 9.7b and 10.8 in Revision 1 included an incorrect conformance rating of 'Conformance' instead of 'Unable to Rate'. The Surveillance Audit determined a Conformance rating for these criteria.