

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Lotte Aluminium Co., Ltd. Ansan Plant

CERTIFICATE NUMBER
75

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION
LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE
18 FEBRUARY 2023

DATE OF EXPIRY
17 FEBRUARY 2026

CERTIFIED SINCE
18 FEBRUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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

Manufacturing of rolled products of
aluminium foil at the Lotte
Aluminium Co., Ltd. Ansan Plant in
South Korea.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Lotte Aluminium Co, Ltd
ENTITY NAME	Lotte Aluminium Co, Ltd. Ansan Plant
CERTIFICATION SCOPE	Manufacturing of rolled products of aluminium foil at the Lotte Aluminium Co, Ltd. Ansan Plant in South Korea.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (13 January 2020 – 15 January 2020)Surveillance Audit (10 November 2021 – 11 November 2021)Re-Certification and Scope Change Audit (9 May 2023 – 11 May 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">13 January 2020 – 15 January 2020 (Initial Certification Audit)10 November 2021 – 11 November 2021 (Surveillance Audit)9 May 2023 – 11 May 2023 (Re-Certification and Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">1 February 2020 (Initial Certification Audit)23 November 2021 (Surveillance Audit)26 May 2023 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (13 January 2020 – 15 January 2020)</u></p> <p>Manufacturing of rolled products of aluminium foil at the Lotte Aluminium Co, Ltd. Ansan Plant in South Korea.</p> <p>Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (10 November 2021 – 11 November 2021)</u></p> <p>Manufacturing of rolled products of aluminium foil at the Lotte Aluminium Co, Ltd. Ansan Plant in South Korea.</p> <p>Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

Re-Certification and Scope Change Audit (9 May 2023 - 11 May 2023)

Manufacturing of rolled products of aluminium foil at the Lotte Aluminium Co., Ltd. Ansan Plant in South Korea.

Supply Chain Activities included in the audit scope:

- Material Conversion

All relevant criteria in the ASI Performance Standard were included in the 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

18 February 2023 – 17 February 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

18 August 2024

CERTIFICATE NUMBER

75



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Lotte Aluminium produces diverse products including Aluminium foil, printed packaging materials, corrugated cardboard boxes, and cans and PET bottles. Founded in 1966, the aluminium foil business has been supplying diverse aluminium foil products such as various medicine and food packaging materials and electronic industrial materials with the best technology and high-tech facilities that have been accumulated over the last 50 years.

The Lotte Aluminium Ansan Plant is located near Seoul in Haean-ro 201, Danwon-gu, Ansan, Gyeonggi-do in South Korea and commenced its operation in 1985 with a size of 4.62 hectares and produces rolled products of aluminium foil for food or pharmaceutical packaging. The annual production of the facility is approx. 32,000 tonnes, and the facility is equipped with rolling mills with Automatic Flatness Control (AFC), separators, slitters, and annealing furnaces.

The facility is located in an industrial complex on the outskirts of the city. There are no nearest sensitive receptors to the facility and the facility's key stakeholders include workers, labour unions, government agencies, the local community, and clients.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	High	Medium	Medium
RISKS	Medium	High	Medium	Medium
PERFORMANCE	Medium	Medium	Medium	Medium
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes that conform with legal requirements related to the ASI Performance Standard. The process states if there are conflicts between law and Customary Law, Applicable Laws will prevail. The Entity has systems in place to maintain awareness of and ensure Compliance with Applicable Laws and to understand Customary Laws. The information on legal compliance is addressed in the Sustainability Report 2021, Compliance section. page 62: https://www.lotteal.co.kr/manage/sustainability.asp</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established, implemented and communicated Policies and processes including the Code of Conduct and Management Procedure of Anti-Corruption to identify and prevent Corruption. All management and employees are provided with training on those processes and committed compliance with the Anti-Corruption Policies. The Entity prohibits Corruption in all its forms including Extortion and Bribery consistent with Applicable Laws and prevailing international standards. The Policy on Anti-Corruption and Business Ethics is available at: https://www.lotteal.co.kr/manage/ethicsManage_ethics.asp</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles related to Environmental, Social and Governance (ESG) performance. The Entity has implemented adequate measures including training and communication to raise awareness of the code among business partners and suppliers. An annual risk assessment for the Code of Conduct and business ethics is conducted and it states a periodic review of the Code.</p> <p>The Code of Conduct, Code of Conduct Guideline and the reporting mechanism are available at: https://www.lotteal.co.kr/manage/ethicsManage_ethics.asp (Korean) http://www.lotteal.co.kr/eng/manage/ethicsManage_ethics.asp (English)</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has endorsement and support from senior management to provide sufficient resources for regular review of the Policies consistent with the ESG practices in the ASI Performance Standard requirements. The Policies are accessible through the internal intranet for communication with Workers and available at: https://www.lotteal.co.kr/manage/safeManage_envir.asp</p> <p>and the Sustainability Report 2021 and Sustainability Management Strategy section, page 20 (Korean and English): https://www.lotteal.co.kr/manage/sustainability.asp</p>
2.2a-c Leadership	Conformance	<p>The Entity has appointed senior Management Representatives with responsibilities defined to ensure conformance with the ASI Performance Standard and to ensure communication of relevant Environmental, social, and governance (ESG) Policies internally and</p>

CRITERION	RATING	COMMENT
		externally. The Entity has provided resources to establish, implement, maintain and improve ESG Management Systems.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity's Environmental Management System is established and maintained. The Entity holds a valid ISO 14001:2015 Environmental Management System certificate. The ISO 14001:2015 certificate is available at: https://www.lotteal.co.kr/manage/safeManage_envir.asp
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity's Social Management System is established and implemented. Social and Occupational Health and Safety (OH&S) impacts are identified and assessed, and the associated management provisions for mitigating these impacts are established and implemented. The Entity holds a valid ISO 45001:2018 Occupational Health and Safety Management System certificate. The ISO 45001:2018 certificate is available at: https://www.lotteal.co.kr/manage/safeManage_security.asp
2.4a-e Responsible Sourcing	Conformance	The Purchasing Policy is published in the Sustainability Report 2021, Sustainable Supply Chain section, page 56 (Korean and English): https://www.lotteal.co.kr/manage/sustainability.asp The Entity identifies its major next-tier suppliers and conducts second party Due Diligence audits. Corrective actions upon the audit findings to improve the performance against the ASI Performance Standard are requested of suppliers. The Entity's ASI Purchasing Process requires periodic review of the Purchasing Policy.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Criterion is not applicable, as the Entity currently has no New Projects or no Major Changes to existing Facilities. However, the Entity has developed a procedure to implement and periodically review environmental and social impacts for New Projects or Major Changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable, as the Entity has no New Projects or no Major Changes to existing Facilities. However, the Entity has developed a procedure to implement and periodically review Human Rights impacts for New Projects or Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity has established and maintains Emergency Response Plans covering fire, hazardous chemical leaks, breakdown of the environmental protection Facilities, extreme weather, electrical loss, safety accidents, labour shortage, pandemics, and cyber-attack. The Entity's Emergency Response Plans are developed considering potentially affected Stakeholder groups such as communities, Workers, government agencies, and Labour Unions. The employees are provided with the relevant training and evacuation drills are conducted periodically. Information on emergency response plans is publicly disclosed in the ASI Information Disclosure, Policy and Management section, page 4: https://www.lotteal.co.kr/down/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf
2.8a-d Suspended Operations	Conformance	The Entity has established and maintained a Management Regulation Operation Process Policy, and business continuity programs for situations that may lead to suspension of, or significantly alter

CRITERION	RATING	COMMENT
		operations. Annual reviews of the Emergency Response Plan and business continuity programs are conducted.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established and maintains a documented Due Diligence Procedure for Mergers and Acquisitions to review its ESG practices. No such activities have occurred since 2017 or are currently planned.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established and maintains a documented procedure for closure, decommissioning and divestment to review its ESG practices. No such activities have occurred since 2010 or are currently planned.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity's annual Sustainability Report was verified by an external third party verification body in September 2022 and is published at the Entity's official website (Korean and English): https://www.lotteal.co.kr/manage/sustainability.asp</p> <p>The report is based on global reporting schemes including the Global Reporting Initiative (GRI), Task Force on Climate-Related Financial Disclosure (TCFD) and Sustainability Accounting Standards Board (SASB).</p> <p>Key performance indicators, and Material environmental, social, and economic impacts and activities are disclosed in the report including ESG performances, interactions with the Local Community and legal compliance information.</p> <p>Additional disclosure information required by the ASI Performance Standard but not included in the Sustainability Report 2021 is available at the Entity's website in Korean: https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf</p>
3.2 Non-compliance and Liabilities	Conformance	<p>Any Significant fines, judgments, penalties and non-monetary sanctions for failure to comply with the Applicable Laws imposed on the Entity for the last three years are publicly disclosed in the ASI Information Disclosure, Governance section, page 5: https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity's annual Finance Report published on the public website (http://dart.fss.or.kr), the payments to government including tax information are addressed. The annual Finance Report was audited by an external third party accounting firm. Payments to government and information on direct or indirect value and beneficiaries of financial and in-kind political contributions are publicly disclosed in the ASI Information Disclosure, Governance section, page 5: https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf</p> <p>Tax payment information is stated in the Entity's Sustainability Report 2021, Tax Strategy section, page 58 (Korean and English): https://www.lotteal.co.kr/manage/sustainability.asp</p>

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity maintains a list of complaints or concerns received from Stakeholders and relevant investigation reports with actions taken. Anonymous whistleblowing or complaint channels are in place on the Entity's premises and through the Entity's website:</p> <p>https://www.lotteal.co.kr/manage/ethicsManage_sinmungo.asp (Korean)</p> <p>http://www.lotteal.co.kr/eng/manage/ethicsManage_sinmungo.asp (English)</p> <p>Information on the complaint reporting system and its operational activities are available in the Sustainability Report 2021, Business section, page 61 (Korean and English):</p> <p>https://www.lotteal.co.kr/manage/sustainability.asp</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) and its report is documented. The Entity's LCA has been developed as a 'cradle-to-gate' assessment and the LCA is conducted in the format defined by the Entity.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The LCA report can be provided for external communication if required and the Entity's communication process includes detailed methods for communication. There have been no requests for LCA data to date. The Entity's LCA report in Korean is publicly available at: https://www.lotteal.co.kr/manage/sustainability.asp
4.2 Product Design	Conformance	The Entity integrates relevant objectives in the design and development process for Products to enhance sustainability, including the environmental life cycle impacts of the end Product. As per the Entity's Development Management Process and Product Service Impact Assessment Process, the Entity integrates relevant objectives in the design and development process for Products to enhance Circular Economy (CE) outcomes in the supply chain.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a target to minimise the generation of Aluminium Process Scrap within its operations, and the Entity collects all process scrap, and it is sold externally for recycling. Due to the nature of the Products of the Entity, alloy separation for Aluminium Process Scrap is not required.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Minor Non-Conformance	<p>The Entity's Product is used for food or pharmaceutical packaging purposes, therefore Recycled Aluminium cannot be used in the Entity's production and the end Product cannot be reused. For this reason, the Entity has a strategy to reduce process scrap in the production process and to contribute less to the generation of aluminium to be recycled that is sold to external collectors.</p> <p>However, it was identified the Entity's strategy to contribute to the recycling of Products has not been publicly disclosed.</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	There is no mandated local or national collection and use of aluminium scrap in Korea and the Entity does not use Recycled Aluminium in the production process considering the nature and use of the Product. For this reason, activities in the Entity to reduce Process Scrap have been implemented to reduce the generation of Recycled

CRITERION	RATING	COMMENT
		Aluminium, and the Entity is in ongoing discussions with main clients to use materials containing Recycled Aluminium in the Entity's Product.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity participates in a Greenhouse Gases (GHG) Emission Trading Scheme regulated by the government. The major Scope 1 and 2 GHG Emissions and Energy use by source are tracked, calculated, and documented annually. As legally required, the Entity's GHG emissions and energy consumption is verified annually by an external accredited third party, and a further conformity check is made by the government. Yearly GHG emissions and energy consumption from 2019 to 2021 are included in the Sustainability Report 2021, ESG Related Indicators section, pages 68-69 (Korean and English):</p> <p>https://www.lotteal.co.kr/manage/sustainability.asp and in the ASI Information Disclosure, Environment section, page 7: https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity's 2020 Carbon Neutral Roadmap includes GHG emissions reduction targets, GHG Emissions Reduction Plans, which includes a reduction plan from 2022 to 2025 based on 2018 Business as Usual (BAU), a reduction plan from 2026 to 2030 based on 2018 BAU and a reduction pathway addressing Direct and Indirect GHG Emissions. Yearly review of GHG emissions reduction targets, plan and reduction pathway is developed. The Entity's reduction plan and pathway are accessible in the Sustainability Report 2021, Climate Action and GHG Emission sections, pages, 28 and 39 -40 (Korean and English)</p> <p>https://www.lotteal.co.kr/manage/sustainability.asp</p> <p>The Entity's annual GHG reduction and energy use plan, pathway and its progress are disclosed in the ASI Information Disclosure, Environment section, page 7: https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf</p>
5.4 GHG Emissions Management	Conformance	The Entity has developed and maintained a GHG Management Regulation and GHG Emission Trading Scheme Management Procedure with aspects associated with GHG emissions, its controls, monthly monitoring, and yearly internal compliance audit against the Entity's GHG Management System. The Entity has documented action plans after yearly internal audits and relevant improvement actions were completed.

CRITERION	RATING	COMMENT
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The operation of air emission facilities is approved by the Government. Air emission pollutants are identified and quantified in the Environmental Impact Assessment. The emission from the tempering process is the major source of Emissions to Air, and a scrubber is used for the treatment. Waste air is collected and treated before discharge to mitigate adverse impacts. The Entity's Environmental Impact Assessment Management Procedure requires a periodic review of the air emission plans. Air emissions have not exceeded legal emission limits since 2001. Annual air emissions volumes by pollutant and management plans are disclosed in the ASI Information Disclosure, Environment section, page 8:</p> <p>https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>Discharges to Water are addressed and managed through the Entity's Environmental Management System. Wastewater generated is collected and transferred to the contracted disposal vendors and the information on the transfer is registered on the official website (https://www.mulbaro.or.kr/web) of the governmental agency. The Entity has established wastewater reduction targets and has developed related plans to achieve targets and minimise adverse impacts. The Entity's Environmental Impact Assessment Management Procedure requires a periodic review of the wastewater management plans. Wastewater volumes from 2020 to 2022 and its management plans are disclosed in the ASI Information Disclosure, Environment section, page 8:</p> <p>https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has established an Environmental Impact Assessment Management Procedure and has conducted an Environmental Impact Assessment and Off-site Risk Assessment on Spills and Leakages, risk areas and its management plans where Spills and Leakages may contaminate air, water and soil. Periodic review of the Spills and Leakages management plans are planned. Volumes for Spills and Leakages from 2020 to 2022 and its management plans are disclosed in the ASI Information Disclosure, Environment section, page 9:</p> <p>https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity's Emergency Response Reporting Procedure requires them to disclose to Affected Populations and Organisations and to inform them of the impact of the Spills and Leakages of the incident. No Spills and Leakages have occurred within the last three years 2020 to 2022 and information on disclosure to Affected Populations and Organisations in case of an incident is disclosed in the ASI Information Disclosure, Environment section, page 9:</p> <p>https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity publicly discloses its waste generation and methods of disposal and reports to the governmental system (https://allbaro.or.kr). The quantities of Non-Hazardous and Hazardous Waste generated in the operation and its management plans are</p>

CRITERION	RATING	COMMENT
		disclosed in the ASI Information Disclosure, Environment section, page 9: https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf The Entity has established a waste management strategy as per the Waste Mitigation Hierarchy and a waste reduction target is established to minimise the negative impact and the achievement status is monitored monthly.
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has conducted a Water Risk Assessment and Water Map which includes operational, internal, and external risks in the Entity's Area of Influence. Due to the Entity's location within an industrial complex, it only uses municipal water and all wastewater generated in processes is undertaken by an external contractor. The results of the water risk assessment are rated as low and are published in the Sustainability Report 2021, Closed-Loop Recycling section, page 42 (Korean and English): https://www.lotteal.co.kr/manage/sustainability.asp The water usage and risk assessment results are published in the ASI Information Disclosure, Environment section, page 11: https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity's water risk assessment is rated and documented as low.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity is located in a large industrial complex, and the biodiversity and ecosystem risk and impact by the operation of the Entity in its Area of Influence was assessed as low. The biodiversity and ecosystem risk assessment has been conducted and is published in the Sustainability Report 2021, Closed-Loop Recycling section, page 43 (Korean and English): https://www.lotteal.co.kr/manage/sustainability.asp The biodiversity and ecosystem assessment results are published in the ASI Information Disclosure, Environment section, page 12: https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity has identified biodiversity and Ecosystem Services risks as low, and no Priority Ecosystem Services have been identified.

CRITERION	RATING	COMMENT
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity has assessed and documented the risk of biodiversity and Ecosystem Services as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the Entity has no Priority Ecosystem Services identified in its Area of Influence and is located in an industrial complex area.
8.4 Alien Species	Conformance	The Entity's Risk Assessment and control plan for Alien Species has identified the wood pallets used for raw material and Product packaging as a controlled risk. Wooden pallets are fumigated to prevent the introduction of Alien Species and the relevant heat-treatment certificate is maintained.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	Based on the Entity's World Heritage Risk Identification and Risk Assessment and business plans, the Entity has a commitment to 'No Go' in World Heritage Properties and does not plan to expand existing or new Facilities.
8.6a-d Protected Areas	Conformance	Due to the Entity's location in an industrial complex area, the Entity's Protected Area Risk Assessment for relevant risks is rated as low. There is a low potential for contamination of Protected Areas as there are no direct Discharges to Water systems. The Entity's risk assessment result and identification of Protected Areas are disclosed in the ASI Information Disclosure, Environment section, page 12: https://www.lotteal.co.kr/down/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has developed Human Rights Policy which is reviewed every year. The Policy is publicly accessible in the Sustainability Report 2021, Lotte Aluminium Human Rights Declaration, page 80 (Korean and English): https://www.lotteal.co.kr/manage/sustainability.asp and available at the Entity's website (English): http://www.lotteal.co.kr/eng/manage/winwinGrowth_intro.asp The Human Rights Risk Assessment including Due Diligence processes is conducted annually which includes risk assessment, conformity assessment, and targets on Human Rights with periodic reviews. The mapping of Affected Populations and Organisations is completed by the Entity and as the location of the Entity is within the industrial complex area, no Material populations and organisations are located or identified within the Entity's Area of Influence.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity commits to respect Gender Equity and Women's Empowerment. Relevant legal requirements are addressed in the Entity's Employment Regulation and the Entity's control programs include objectives and targets to foster Gender Equity and the program is reviewed annually. No complaints or grievances on Gender

CRITERION	RATING	COMMENT
		Equity have been reported. The effectiveness of the program is available in the ASI Information Disclosure, Social section, page 14: https://www.lotteal.co.kr/download/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence and no New Projects or Major Changes have taken place since the Entity joined ASI.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The official government website of Land Use and Development Information Service (www.eum.go.kr), Land Registration Map, and the Entity's Protected Area Risk Assessment has demonstrated there are no sacred or cultural heritage sites and values, and no Indigenous Peoples are present within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as no New Projects or Major Changes have taken place since the Entity joined ASI and no displacement or no resettlement activities are necessary.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established a Policy for respecting the legal and customary rights and interests of Local Communities and Affected Populations and Organisations. The Entity has conducted a risk assessment and implemented actions including consultation for developing programs and their regular review. The Entity's risk assessment of Affected Populations and Organisations demonstrated any negative impacts from the Entity's activities are limited due to its location within an industrial area. The Entity delivers charity and donation activities to foster involvement and support the livelihoods of Local Communities. Further information is included in the Sustainability Report 2021, CSR Activities section, page 52 (Korean and English): https://www.lotteal.co.kr/manage/sustainability.asp
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established a Purchasing Policy on the avoidance of involvement in armed conflict or Human Rights abuses. They have implemented and maintained a Due Diligence process for its Aluminium supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs). The Purchasing Policy is accessible through the Entity's Sustainability Report 2021, Sustainable Supply Chain section, page 56

CRITERION	RATING	COMMENT
		(Korean and English): https://www.lotteal.co.kr/manage/sustainability.asp To implement the Policy, the Entity's Conflict Mineral Management Regulation includes roles and responsibilities, and the Due Diligence process for each supplier risk assessment is maintained.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity's risk assessment includes potential risks of involvement in armed conflict or Human Rights abuses and further risks are identified and assessed through supplier audits. The rated risk level is low and identified risks have not occurred.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity's supply chain risk assessment has demonstrated no involvement in armed conflict or Human Rights abuses. To maintain conformance, the Entity conducts regular supply chain Due Diligence and responds to identified risks as regulated in the Entity's Conflict Mineral Management Procedure.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The ASI Performance Standard Audit itself addresses this Criterion. The Entity uses a due diligence mechanism based on OECD guidelines for minerals from conflict-affected and high-risk areas, along with a checklist of approved brands from the London Metal Exchange. This helps the Entity assess the risk of each supplier's involvement in armed conflict or human rights abuses in their supply chain. The results of this assessment are recorded and maintained.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The results of the Due Diligence process and declaration of non-involvement in armed conflict or Human Rights abuses are disclosed in the Sustainability Report 2021, Closed-Loop Recycling section, page 43 (Korean and English): https://www.lotteal.co.kr/manage/sustainability.asp
9.9 Security practice	Conformance	The Entity's commitment and approach to security activities that respect Human Rights are in place. No direct or indirect body searches by security are allowed. Interviews with Workers confirm they do not have any concerns about security practices. There are no grievances or complaints against security activities to date.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity's commitment to respect Freedom of Association and Collective Bargaining is addressed in the Lotte Aluminium Human Rights Declaration: https://www.lotteal.co.kr/manage/sustainability.asp Union leaders and representatives are elected by Workers in an anonymous, direct, and confidential manner. There is a formal Collective Bargaining Agreement (CBA) that is agreed between the Labour Union and the Entity. No complaints or negligence of Collective Bargaining rights have been received to date.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as there are no restrictions on the right to Freedom of Association and Collective Bargaining as per the Constitution of the Republic of Korea.

CRITERION	RATING	COMMENT
10.2a Child Labour	Conformance	<p>The Entity's commitment to the prohibition of Child Labour is addressed in the Lotte Aluminium Human Rights Declaration: https://www.lotteal.co.kr/manage/sustainability.asp</p> <p>The Entity has conducted a Human Rights and Labour Risk Assessment regarding the risks of using Child Labour or hazardous works undertaken by young Workers. The relevant assessed risk level is low (or none). Review of the Worker register and interviews with management and Workers, there is no child under 15 years or young Workers under 18 years present. The youngest Worker is at the time of the audit was 22 years old.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity's commitment to the prohibition of any type of Forced Labour is addressed in the Lotte Aluminium Human Rights Declaration: https://www.lotteal.co.kr/manage/sustainability.asp</p> <p>The Entity has conducted a risk assessment on Forced Labour and the relevant risk assessment is low. Workers are hired directly, and the Entity does not request savings, deposits, original copies of Workers' identification documents, Recruitment Fees or have a loan scheme. Workers have a right to resign without penalty and the Entity does not restrict Workers' freedom of movement.</p> <p>The Modern Slavery Statement including the Entity's Policy, Due Diligence process, results, and endorsement by senior management is available at: https://www.lotteal.co.kr/manage/sustainability.asp</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity's commitment to the prohibition of any type of Discrimination is addressed in the Lotte Aluminium Human Rights Declaration: https://www.lotteal.co.kr/manage/sustainability.asp</p> <p>The Entity has established a Human Rights and Labour Risk and Target Management Program. Decisions in hiring, during employment (such as compensation, promotion, access to training, and equitable payment) or terminating Workers are based on their ability to perform job requirements rather than other personal characteristics. No complaints of Discrimination have been received to date.</p>
10.5 Communication and engagement	Conformance	<p>Workers can freely express their concerns or grievances to the Facility and the grievance process is established in the Entity's Labour Management Council Regulation. Direct and periodic communication between the Entity and Workers or their representatives is established and implemented. Workers can engage with their union representatives to report any complaints or concerns. All interviewed Workers stated that they know where to lodge complaints or report concerns.</p>
10.6a-g Violence and Harassment	Minor Non-Conformance	<p>The Entity's commitment to the prohibition of violence, abuse and sexual harassment is addressed in the Lotte Aluminium Human Rights Declaration which is reviewed annually.</p> <p>https://www.lotteal.co.kr/manage/sustainability.asp</p> <p>The risk assessment and its control measures on the prohibition of abuse, harassment and sexual harassment are developed and conducted. Workers are provided with training and communication on the regulations and control measures.</p> <p>However, it was identified that Workers and their representatives did not participate in, nor were consulted as part of the risk assessment to</p>

CRITERION	RATING	COMMENT
		identify, assess, and take proper control measures of workplace Violence and Harassment.
10.7a-c Remuneration	Conformance	<p>The Entity's commitment to correct payment is addressed in the Entity's Human Rights Declaration: https://www.lotteal.co.kr/manage/sustainability.asp</p> <p>Based on the review of payslips, Workers are paid higher than the legal minimum wage and 150% of the ordinary wage for Overtime, night-time shifts (22:00 to 06:00) and holiday work is paid correctly. Workers are provided with payslips including details of payment including base wage, Overtime wages, other allowances, and deduction details. Payments are made directly to Workers via bank transfers each month. Monthly payments are made on time and there has been no delay in payment.</p>
10.8a-c Working Time	Conformance	<p>The Entity's commitment to compliance with working hours regulations is addressed in the Entity's Human Rights Declaration: https://www.lotteal.co.kr/manage/sustainability.asp</p> <p>The Entity has developed regulations on working hours, rest, and other leave entitlements, and conducted a risk assessment on working hours which is rated as low. Based on a review of records of working hours and interviews, Workers do not exceed legal working hours (52 hours per week) and take an average of one day off per seven days. Workers interviewed confirm they do not work exceed legal working hours and can use their leave entitlements.</p>
10.9a-b Informing Workers of Rights	Conformance	Workers are informed of their rights described in the Entity's Human Rights Declaration, Collective Bargaining Agreement, Employment Regulation, Labour Contract, and other regulations through the Entity's intranet or bulletin board.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity's Occupational Health and Safety (OH&S) Policy commits to comply with relevant legal requirements, to continually improve performance. The Policy is reviewed periodically. It is communicated with Stakeholders at the Entity's premises and in the Sustainability Report 2021, OH&S Management section, pages 46-47: https://www.lotteal.co.kr/manage/sustainability.asp</p> <p>The Entity has established and implemented OH&S System applicable to Workers, employees and Visitors, and holds a valid ISO 45001:2018 certificate: https://www.lotteal.co.kr/manage/safeManage_security.asp</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>Through an annual management review, the Entity has reviewed its OH&S Policy and OH&S Management System, and safety orientation is provided to Visitors when entering the sites.</p> <p>The effectiveness of the Entity's OH&S Management System including lagging indicators and comparative analysis of performances with peer Businesses and leading practices is disclosed in the ASI Information Disclosure, Social section, page 15: https://www.lotteal.co.kr/down/%E2%91%A2ASI%EC%A0%95%EB%B3%B4%EA%B3%B5%EA%B0%9C.pdf</p> <p>It was identified however that the effectiveness of the Entity's leading indicators is not included in the public disclosure.</p>

CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established formal documented procedures for Workers' consultation and participation in Health and Safety aspects. There are periodic health and safety committee meetings with Workers and contractors to discuss and improve Health and Safety issues and relevant results of the committee meetings are communicated. Workers can freely report on near-miss incidents, concerns and/or offer advice on health and safety issues and further review improvement actions undertaken by the Entity.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 February 2020	Issued (Full Certification)
1	29 March 2021	Revised criterion 10.3 to 'not applicable' to reflect what was initially reported in the elementAI audit report.
2	16 December 2021	Surveillance Audit
3	23 June 2023	Re-Certification Audit and Scope Change – Full Certification; Scope Change to apply PS V3 which includes supply chain activity change from 'Material Conversion (Production and Transformation)' to 'Material Conversion'.