

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Indonesia Asahan Aluminium (Persero)

CERTIFICATE
NUMBER

246

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

DATE OF ISSUE
5 JANUARY 2023

CERTIFICATION LEVEL
FULL
CERTIFICATION

DATE OF EXPIRY
4 JANUARY 2026

ASI ACCREDITED
AUDITING FIRM

TÜV RHEINLAND
CERT GmbH

CERTIFIED SINCE
5 JANUARY 2023

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

Indonesia Asahan Aluminium
(INALUM)'s Smelting plant Kuala
Tanjung (Indonesia).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Indonesia Asahan Aluminium (INALUM) Persero
ENTITY NAME	PT Indonesia Asahan Aluminium (Persero)
CERTIFICATION SCOPE	Indonesia Asahan Aluminium (INALUM)'s Smelting plant Kuala Tanjung (Indonesia).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (17 - 25 October 2022)Surveillance Audit (29 January - 2 February 2024)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">17 - 25 October 2022 (Initial Certification Audit)29 January - 2 February 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">4 December 2022 (Initial Certification Audit)1 April 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (17 - 25 October 2022)</u></p> <p>All the facilities at the INALUM Primary Aluminium Smelting plant located in Kuala Tanjung.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (29 January - 2 February 2024)</u></p> <p>All the facilities at the INALUM Primary Aluminium Smelting plant located in Kuala Tanjung.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that:

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- ☑ 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.
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CERTIFICATION PERIOD 5 January 2023 – 4 January 2026

NEXT AUDIT TYPE Re-Certification Audit

NEXT AUDIT DATE 4 January 2026

CERTIFICATE NUMBER 246



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

The INALUM Facility (the 'Entity') commenced operation in 1982. Primary activities include receiving main material via the Entity-owned port and conveying to silo and warehouse, producing carbon anode blocks in the green plant, producing molten Aluminium in the reduction plant and producing Aluminium ingot, Aluminium billet and Aluminium alloy in the casting plant. The area under management is approximately 255 hectares and has approximately 1,800 employees. It produces 250,000 tonnes per annum.

The Entity includes the administration office, port facilities, access roads, vehicle parking (bus, car, motorcycle and operating vehicle), warehouse, workshop, substation (power station), laboratories, raw material storage, fuel and chemical storage, cafeteria or canteen, utilities (water treatment plant & compressor), wastewater treatment plant, religious (prayer) facility, and sports facility.

The nearest townships are the Kuala Tanjung village and Kuala Indah village, and nearby sensitive receptors include the Tanjung River and the ocean. Key external stakeholders include Government/regulatory agencies of Indonesia, society, customers and suppliers.

A Pot Upgrading Technology project continues on site in order to increase the capacity of the Aluminium to 300,000 tonnes by 2025.

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	Medium	Medium	HIGH
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established a procedure to review changes in laws and regulations to manage awareness and compliance within the organization. The Section Legal Administration (SLA) is responsible for the annual collection and assessment of Applicable Law related to labour, ethics, health and safety and environment.
1.2 Anti-Corruption	Conformance	The Entity has implemented an Anti-Corruption Guideline and communicated it internally and externally, refer to: https://inalum.id/id/esg/tata-kelola/tata-kelola-perusahaan The Entity has a valid certification to ISO 37001:2016, valid until August 2026.
1.3a-e Code of Conduct	Conformance	The Entity has implemented and communicated a Code of Ethics and an Anti-Corruption Guideline, including principles relevant to environmental, social and governance performance. The documents are subject to an annual review. The Code of Ethics is available at: https://inalum.id/id/esg/tata-kelola/tata-kelola-perusahaan
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued and published a Policy in the local language (Bahasa Indonesia) that addresses Occupational Safety and Health, environment and energy, Human Rights and environmental social responsibility. All policies are reviewed annually through management review. New employees receive induction training on the policies. The policies are displayed at the Entity including on the HSE noticeboards, and can be accessed at: https://inalum.id/id/esg/tata-kelola/kebijakan-perusahaan
2.2a-c Leadership	Conformance	The Entity's Director of Operations and Portfolio has the ultimate responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources for implementation. This role is supported by the Head of Safety, Quality and Environment Department as the ASI representative for INALUM.
2.3a Environmental and Social Management Systems - Environmental	Conformance	An Environmental Management System has been established and implemented. The Entity has obtained ISO 14001:2015 certification from an accredited certification body.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established an integrated Environmental, Social and Governance (ESG) Management System, which includes their Social Management System. An internal audit and management review is conducted annually to ensure the effectiveness of the ESG Management System. For identified non-conformances, the Entity has conducted root cause analysis and taken corrective and preventive action.
2.4a-e Responsible Sourcing	Conformance	The Entity is committed to responsible sourcing. Responsible sourcing is implemented in the Entity through signed integrity pacts, business partner (suppliers/vendor/contractors) assessments and

CRITERION	RATING	COMMENT
		encouraging business partners to implement ESG management systems. The Responsible Sourcing Policy is publicly available on the website: https://inalum.id/id/esg/tata-kelola/responsible-sourcing
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as New Projects or Major Changes to existing Facilities did not take place since the Entity joined ASI. In accordance with Indonesian regulation, relevant projects and changes in the process must undergo a thorough analysis and authorization process and as a state-owned company, the Entity has established systems to manage this effectively.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as New Projects or Major Changes to existing Facilities did not take place since the Entity joined ASI. In accordance with Indonesian regulation, relevant projects and changes in the process must undergo a thorough analysis and authorization process and as a state-owned company, the Entity has established systems to manage this effectively.
2.7a-f Emergency Response Plan	Conformance	The Entity has developed and implemented Emergency Response Plans (ERP). The ERPs address emergency scenarios/crisis organization, communication guidelines and business continuity plans. The emergency response team has been established and undergo training annually in accordance with the established schedule.
2.8a-d Suspended Operations	Conformance	The Entity has developed a Business Continuity Plan Guidance. The Entity has established emergency response procedures and appointed an emergency response team and a business continuity management team to implement the Business Continuity Plan procedures.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a Business Development Activities procedure, which includes a Due Diligence process to be enacted prior to a merger or acquisition. The implementation of these procedures in the process of acquiring assets of subsidiaries in the previous year is in accordance with the ASI Performance Standard.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed a formal internal process for reviewing environmental, social and governance issues in the planning process for closure, decommissioning and divestment. No closure, decommissioning and divestment occurred in the previous three years and there are no known plans in the future.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has disclosed the Sustainability Report 2022, which addresses environmental, social and economic impacts: https://www.inalum.id/id/esg/hubungan-investor/laporan-berkelanjutan
3.2 Non-compliance and Liabilities	Conformance	The Entity has disclosed information on fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in its corporate sustainability reporting. There are no non-compliance or liabilities reported, please refer to the Sustainability Report:

CRITERION	RATING	COMMENT
		https://www.inalum.id/id/esg/hubungan-investor/laporan-berkelanjutan
3.3a-c Payments to Governments	Conformance	The Financial Audit Report 2022 is issued by a qualified Third Party and has identified that the Entity's payments to government are only those legally required and no other payments are reported. The Entity has disclosed the payments to governments in the Sustainability Report 2019, 2020, 2021, 2022: https://www.inalum.id/id/esg/hubungan-investor/laporan-berkelanjutan
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has developed and implemented Policies and documented processes that are appropriate to complaints, grievances and stakeholder requests for information. The Entity's integrated Management System receives, manages, processes and follows up on reports/disclosures regarding violations of laws and regulations, the Entity's code of ethics, generally accepted accounting principles, the Entity's operational policies and procedures or other fraudulent acts, anonymously and independently. The Entity has implemented several mediums to allow direct engagement by Stakeholders. The Complaints Resolution Mechanism can be accessed via the website: https://inalum.id/id/whistle-blowing-system
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a Life Cycle Assessment (LCA) to assess the impact of the Aluminium production process. The impact categories calculated in the study addressed global warming, acidification, eutrophication, ozone layer depletion, and the use of energy and renewable energy. The LCA study has been undertaken according to ISO 14040 and ISO 14044. The LCA reports can be accessed through the company portal: https://inalum.id/id/esg/lingkungan/lingkungan
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has made public the LCA Report and commits to communicating the results of the LCA: https://www.inalum.id/id/esg/hubungan-investor/laporan-berkelanjutan
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established Key Performance Indicators (KPI's) to minimise Aluminium Process Scrap generation through quality improvement and oversight and targets 100% of scrap generated to be recycled.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has a valid contract with a licensed collection and recycling management company. The Entity has monitored the recycled Aluminium rate in the products and there is a detailed program to improve the reuse rate of Aluminium for products at End of Life.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has published its Greenhouse Gas (GHG) Emissions data in the Sustainability Report 2022: https://www.inalum.id/id/esg/hubungan-investor/laporan-berkelanjutan</p> <p>The GHG emissions calculation is performed by a qualified Third Party and addressed Scope 1 GHG emissions generated by the Entity. The GHG emissions are verified by a qualified Third Party. The Entity's Management System is certified to ISO 50001, issued by an accredited certification body and is valid to 2025.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable, as the Entity was fully operational (started production) in January 1982.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Minor Non-Conformance	<p>The Entity's major GHG generation sources are electricity and natural gas. The source of the Entity's electricity is 100% renewable (owned hydroelectric power plant). The management team annually review the GHG Emissions Reduction Plan and performance. Energy data are monitored and reviewed monthly.</p> <p>The Entity's internal GHG emission intensity to December 2023 was 3.8 t CO₂e/t Al. However, the Entity has not developed a Mine to Metal Emissions intensity calculation (incorporating Scope 3 emissions).</p>
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established plans to reduce CO₂e emissions and has implemented improvement programs covering direct and indirect emission sources to achieve their target. The GHG Emissions Reduction Plan is consistent with a 1.5°C warming scenario. The GHG Emissions Reduction initiatives are disclosed in the Sustainability Report, page 64: https://www.inalum.id/storage/media/2023/10/sustainability-report-2022-update-jywvob.pdf</p> <p>However, it was noted at the time of the audit that the Entity had not publicly disclosed the progress towards the GHG Emission Reduction Plan on an annual basis.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established and implemented an Environmental Management System (EMS) that is ISO 14001:2015 certified. The EMS covers environmental aspects and impacts related to GHG emissions and their control. The Entity has documented and implemented several programs for reducing GHG emissions. The plan is outlined in the Sustainability Report, page 64: https://www.inalum.id/storage/media/2023/10/sustainability-report-2022-update-jywvob.pdf</p> <p>Quantitative data can also be found in the LCA Report: https://inalum.id/en/esg/environment/environment</p>

CRITERION	RATING	COMMENT
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	<p>The Entity has established an Air Emissions Management System that measures and reports on emissions with continual improvement to mitigation actions and controls and complies with local legislation. The Emissions to Air are substantially below regulatory limits. The Entity has installed air emission control devices that treat gases before release to the environment. Air emission information can be accessed in the Sustainability Report 2022, page 64: https://www.inalum.id/id/esg/hubungan-investor/laporan-berkelanjutan</p> <p>The Entity's Air Emission Strategic Plan is available on the website: https://www.inalum.id/en/esg/environment/air-emissions</p> <p>However, it was noted that the Entity has not publicly disclosed the amount of Material Emissions discharged to air.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has established a wastewater inventory to control discharges to sea. All the industrial wastewater is collected and treated at the wastewater treatment plant (WWTP). The Entity has monitored the wastewater monthly and no exceedance has been detected. The Entity has established a continual reduction plan for wastewater discharge and the implemented improvement programs are monitored. Wastewater management information is available in the Sustainability Report: https://www.inalum.id/id/esg/hubungan-investor/laporan-berkelanjutan</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has completed a Spills and Leakage risk assessment as defined in relevant procedures and work instructions. The Entity has publicly disclosed the latest version of the Spills and Leakage Management Plan at: https://www.inalum.id/id/esg/lingkungan/keberlanjutan-lingkungan.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has an environment protection procedure that defines how to dispose and report Spills, which is in accordance with the ISO 14001:2015 standard and applicable local legislation. Should a spill occur, the Emergency Response Team initiates the Emergency Response Plan procedure to deal with incidents. Spill drills have been conducted bi-annually to ensure the effectiveness of emergency actions taken and that the process is up to date. Specific information about spills and leakage disclosed at: https://www.inalum.id/id/esg/lingkungan/keberlanjutan-lingkungan</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has a Waste Management Procedure that defines the process for collecting and disposing of all waste. All Hazardous Waste is transferred to qualified and licensed third parties according to legal requirements. Inventory and disposal receipts are retained for review. The Entity has established a target for continuous improvement to reduce waste generation and this target is reviewed annually by senior management.</p> <p>The Entity has disclosed details on waste management including the amount of waste generated in the Sustainability Report 2022, page 74: https://www.inalum.id/storage/media/2023/10/sustainability-report-2022-update-jywvob.pdf</p>

CRITERION	RATING	COMMENT
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)	Conformance	The Entity has a licensed hazardous waste temporary storage area, where the Spent Pot Lining (SPL) is stored in a manner that prevents the release of leachate to the environment. The SPL is packed into bags, labelled according to local legislation as Hazardous Waste and is not stacked. The Entity has established an SPL management procedure which includes optimizing the recovery and recycling of carbon and refractory materials. The Entity delivers SPL to an approved cement industry for co-processing to become alternative raw material for cement manufacturing. The Entity's SPL management is in accordance with the requirements and no SPL is landfilled or discharged to marine or aquatic environments.
6.8a-d Dross	Conformance	The Entity works continually to maximize the recovery of Aluminium by treatment of Dross and Dross residues. The Entity ships all recovered Dross to a licensed recycling facility. As the Entity does send all recovered dross to licensed recycling companies, there are no Dross residues on site and therefore no landfilling of Dross.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has conducted a risk assessment, and the results indicate water-related risks are low. The Entity is located within a low water risk area. Whilst the Entity has no Material water-related risks, it has disclosed its water usage and risks in the Sustainability Report 2022, page 63: https://www.inalum.id/id/esg/hubungan-investor/laporan-berkelanjutan
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity has no material water-related risks. However, the Entity has established annual targets to continually reduce water consumption and has implemented programs to achieve the targets. The Entity has established eight programs for water efficiency. The targets and progress of these programs are reviewed quarterly. Water action plans can be downloaded at: https://www.inalum.id/en/esg/environment/water
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Biodiversity assessment has been included in the Environmental Impact Assessment (EIA) report conducted by a qualified Third Party and approved by the government. The EIA report indicates that the potential impact is assessed as low, and this is validated by on-site observations and community interviews. Biodiversity action plans can be downloaded at: https://www.inalum.id/id/esg/lingkungan/keanekaragaman-hayati
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the impact to Biodiversity and Ecosystem Services has been assessed as low. However, the Entity has established action plans for biodiversity management and the plans are approved by the local environment department. The Entity has undertaken consultation with communities and stakeholders regarding the identification of Priority Ecosystem Services as part of the EIA.

CRITERION	RATING	COMMENT
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the impact to Biodiversity and Ecosystem Services has been assessed as low. However, the Entity has established action plans for biodiversity management and the plans, which are consultative and designed in accordance with the Biodiversity Mitigation Hierarchy, are approved by the Regional Environment Department. Biodiversity action plans can be viewed at: https://www.inalum.id/id/esg/lingkungan/keanekaragaman-hayati
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the impact to Biodiversity and Ecosystem Services has been assessed as low. However, the Entity consumes surface water (river) as a Priority Ecosystem Service. The Entity has established an action plan for biodiversity management and the plan of the activity is included in the EIA, which is consultative in nature and designed in accordance with the Biodiversity Mitigation Hierarchy.
8.4 Alien Species	Conformance	The Entity has assessed the Alien Species and no high risk has been identified. One of the preventive measures taken by the Entity is the requirement for the fumigation of wooden pallets used to import goods.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity does not have a new business development plan such as opening a new facility or expanding the Facility area. The Entity is committed to "No Go" in World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity has been established for 43 years in an area approved by the Government and this area is currently being transformed into an industrial precinct. The Entity's operation and production area, including its Area of Influence (port, road, housing complex and supporting facilities) is not within a Protected Area based on the Social Mapping Report issued by an independent and competent consultant.
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 established a Human Rights Policy which references the UN Guiding Principles on Business and Human Rights: https://www.inalum.id/id/esg/sosial/hak-asasi-manusia The Entity's gender-responsive Human Rights Due Diligence and Social Mapping of Affected Populations and Organization reports have been prepared by an independent and competent Third Party. No salient issues were reported.
9.2a-e Gender Equity and Women's Empowerment	Conformance	Women's legal rights and interests, such as gender equality, the ability to vote and hold public office, access to education and training, employment opportunities, advancement opportunities, and maternal health, are upheld and respected by the Entity. No complaints from female employees were made during the interview or evident in site observations, and there was no evidence of Discrimination against women. The Entity publishes publicly on gender diversity metrics, such as the proportion of male and female employees, in the Sustainability

CRITERION	RATING	COMMENT
		Report, page 109: https://www.inalum.id/id/esg/hubungan-investor/laporan-berkelanjutan
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as based on the Social Mapping Report undertaken by a competent Third Party, there is no presence of Indigenous Peoples or their lands, territories and resources at the Facility.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as no New Projects or Major Changes have taken place since the Entity joined ASI. There is no presence of Indigenous Peoples or their lands, territories and resources at, or adjacent to the Facility.
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 Free, Prior, and Informed Consent (FPIC) is not required as there is no presence of Indigenous Peoples or their lands, territories and resources at, or adjacent to the Facility..
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable, as based on the Social Mapping Report, there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as based on the Social Mapping Report there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable, as no New Projects or Major Changes have taken place since the Entity joined ASI.
9.7a-h Affected Populations and Organisations	Conformance	The Entity respects the legal and customary rights and interests of Affected Peoples and Organisations in their lands, livelihoods and use of natural resources. The Entity's Corporate Social Responsibility (CSR) programs include reference to the consultation undertaken in developing the programs and the regularity of review of the programs. Information on the CSR programs is available at: https://www.inalum.id/id/esg/sosial/tanggung-jawab-sosial
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity is committed to responsible sourcing including a commitment to not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The Responsible Sourcing Policy has been issued and communicated to all related parties. Responsible sourcing is implemented in the Entity through the signed integrity pacts, business partner (suppliers/vendor/contractors) assessments and encouraging business partners to implement ESG management systems. The Policy is available on the website: https://inalum.id/id/esg/tata-kelola/responsible-sourcing

CRITERION	RATING	COMMENT
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented a process to ensure that the Alumina used as the main material does not originate from armed conflict or Human Rights abuses areas. All potential suppliers are systematically screened by the procurement system: https://ipro.inalum.id/app/index/home
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable, as the Entity's assessment did not identify any actual or potential risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has established an ASI Standards Manual, which includes the procedure that ensures the Entity does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The Entity has implemented Management System processes and plans for improvement. Through internal investigations from Due Diligence investigation reports, as well as the supplier signed commitments, no material has been sourced from Conflict-Affected and High-Risk Areas.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has publicly disclosed its Due Diligence system and practices at: https://www.inalum.id/id/esg/tata-kelola/responsible-sourcing
9.9 Security practice	Conformance	There are no armed security forces working for the Entity. In order to address security procedures, the Entity has established a due diligence procedure and Human Rights Risk Assessment. There are training and certification programs for security personnel, as well as written contracts between businesses and security agencies that comply with local laws. Safety practice records are legitimate and adhere to ASI Standards.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity has established and implemented the rights of Workers to Freedom of Association and Collective Bargaining in its Human Rights Policy: https://inalum.id/en/human-rights The Collective Labour Agreement is discussed between the union and management in good faith and mutual respect.
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 Indonesian legislation does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	The Entity has established and implemented a recruitment procedure to ensure the minimum age for hiring Workers is 18 years. The Human Resources Department checks and verifies Worker's documentation, such as a family tree, school diploma, or national identity card, during the employment application process. The Policy is also applicable to subcontractors working at the Entity. For subcontractors the Entity is committed to the sourcing procedure, which includes the minimum age of 18 years.

CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Minor Non-Conformance	<p>All Workers are directly employed by the Entity. The Entity does not engage in nor support the use of Forced Labour as defined in Indonesian labour laws and ILO Conventions C29 and C105. The Human Rights Policy outlines this commitment and applies to all Workers including subcontractors. The Entity publicly discloses its commitment against the use of Modern Slavery at: https://www.inalum.id/id/esg/sosial/hak-asasi-manusia</p> <p>However, The Entity has not publicly disclosed a specific Modern Slavery Statement which details organisational actions to address Modern Slavery.</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity follows Human Rights principles in terms of employee remuneration, welfare, social security, working conditions, education and training, as well as other matters related to the sector. The Entity ensures all employees receive equal opportunity to participate in education and training programs in accordance with their needs and the business development plans. No complaints on Discrimination were received during the audit. The Entity documents its policy on Discrimination as part of its Human Rights Policy: https://www.inalum.id/id/esg/sosial/hak-asasi-manusia</p>
10.5 Communication and engagement	Conformance	<p>A communication procedure has been established by the Entity. The Entity surveys its workforce and holds monthly meetings to interact directly with employees and their representatives. All communication and engagement records are current and compliant with the ASI Standard.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established a Workplace Policy on Violence and Harassment as regulated by the Collective Labor Agreement, which is in accordance with Indonesian legislation. Policies are reviewed annually through management review and updated to reflect any change in business process, standard and legal obligation. New employees receive induction training, and all employees receive refresher training every three years on the Entity's policies. The Violence and Harassment Policy is publicly disclosed at: https://www.inalum.id/id/esg/sosial/hak-asasi-manusia</p>
10.7a-d Remuneration	Conformance	<p>The Entity's lowest employee remuneration is above the minimum standard set by the Government and is above the average of similar companies. Employee remuneration components consist of basic salary, allowances, incentives, and fringe benefits. The compensation for Overtime meets the legal requirements. Records relating to remuneration are maintained and up to date.</p>
10.8a-c Working Time	Conformance	<p>Working time is recorded electronically (face scan) by the Entity, with working hours in compliance with local laws. Records relating to working time are maintained and are up to date.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity communicates the Human Rights Policy which includes informing employees of their rights through mechanisms including: induction of new employee training, email, posting in strategic places, and meeting agenda items. The Collective Labor Agreement (CLA) regulates the rights and obligations of employees, all employees are able to access this CLA through the Entity's internal portal.</p>

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has a documented Occupational Health and Safety (OH&S) Management System and holds an ISO 45001:2018 certification recommendation letter issued by an accredited certification body. The Entity's OH&S objectives and targets are established and documented in the Entity's Occupational Health and Safety Program. The implementation plans are established and implemented. The Entity's OH&S performance is monitored monthly, and the management review is conducted annually.</p> <p>However, during the Surveillance Audit, several non-conformances were found. These include:</p> <ol style="list-style-type: none"> 1. In the Hazard Identification, Risk Assessment and Control Procedure (no: SSM-PMI3-002/5), it is stated that if the risk category is medium (grade= 5-12) then mitigation action is taken if the benefit value > mitigation costs. However, the Entity has not determined the amount of benefit value (Cost Benefit Analysis). 2. Two food handlers were using accessories (watches and bracelets) in the kitchen area, which could cause a source of contamination in the food that was being served. 3. Two WWTP operators' competence is not fulfilled (WWTP Operator Training Certificate unavailable).
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's OH&S objectives and targets are established and documented in the Entity's Occupational Health and Safety Program. The implementation plans are established and implemented. The Entity's OH&S performance is monitored monthly, and the management review is conducted annually. The Entity publicly discloses the effectiveness of the OH&S Management System in the Sustainability Report page 97:</p> <p>https://www.inalum.id/storage/media/2023/10/sustainability-report-2022-update-jywvob.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has a system of Workers' consultation and participation in health and safety in accordance with the requirements of ISO 45001:2018. Workers are encouraged to report their concerns or advice on OH&S issues by themselves or via the Worker representative, and management responds to the concerns and advice provided by Workers. Each employee has a target to undertake safety observations with these targets set by management.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	5 January 2023	Initial Certification Audit – Full Certification
1	3 May 2024	Surveillance Audit

