

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Qatar Aluminium Limited (QATALUM)

CERTIFICATE NUMBER  
195

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION  
LEVEL  
FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM  
DNV BUSINESS  
ASSURANCE SERVICES  
UK LTD.

DATE OF ISSUE  
28 MARCH 2024

DATE OF EXPIRY  
27 MARCH 2027

CERTIFIED SINCE  
11 APRIL 2022

## AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

Aluminium smelting and casthouse  
operations for the manufacture of  
extrusion ingots and primary  
foundry alloy in Mesaieed Industrial  
City (MIC), Qatar.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Qatalum
ENTITY NAME	Qatar Aluminium Limited (QATALUM)
CERTIFICATION SCOPE	Aluminium smelting and casthouse operations for the manufacture of extrusion ingots and primary foundry alloy in Mesaieed Industrial City (MIC), Qatar.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (28 November – 16 December 2021)</li><li>Re-Certification Audit and Scope Change (22 – 26 October 2023)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>28 November – 16 December 2021 (Initial Certification Audit)</li><li>22 – 26 October 2023 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>1 March 2022 (Initial Certification Audit)</li><li>19 February 2024 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (28 November – 16 December 2021)</u></p> <p>The audit scope included the smelter and casthouse operations, carbon plant, power plant, port and storage facilities and Head Office functions such as human resources, supply chain, health and safety, security, environment and sustainability, emergency/ fire, marketing and sales, internal audit, medical first aid, finance and legal.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (22 – 26 October 2023)</u></p> <p>The audit scope included the smelting and casthouse operations for the manufacture of extrusion ingots and primary foundry alloy.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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AUDIT OUTCOME

- Certification

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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.

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CERTIFICATION PERIOD

28 March 2024 – 27 March 2027

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NEXT AUDIT TYPE

Surveillance Audit

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NEXT AUDIT DATE

27 September 2025

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CERTIFICATE NUMBER

195



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.

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## ENTITY OVERVIEW

Qatalum (the 'Entity') operates an Aluminium Smelter in Mesaieed Industrial City, Qatar, approximately 40 kilometres south of Doha. The facilities at the Entity include a carbon plant, a reduction plant, a Casthouse, port and storage facilities as well as a captive power plant. Qatalum produces more than 650,000 tonnes of high-quality Primary Aluminium Products per annum. The operations commenced in 2009. The Potline and Rectifier is 1.2 km in length, there are 704 pots in total, 352 cells in two pot lined potrooms and 14 pot tending machines.

The market for the Entity's Extrusion Ingots includes Asia, Europe/Türkiye and the US, which are converted into residential and commercial building and construction products mainly door and window frames, curtain walling, and some automotive applications in HVAC systems, crush systems and battery pack cells. The market for the Entity's Primary Foundry alloys is similar and mainly used for alloy wheel production and other automotive applications.

The Entity is currently implementing an Electrolysis Process Optimisation Project to increase Aluminium production at the plant. Beyond the routine relining of pots, and with the possible exception of its rectifiers, no other modifications are required to the plant to achieve this production increase. There is no change to the layout of the plant.

## 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
<b>SYSTEMS</b>	High	High	Medium	HIGH
<b>RISKS</b>	Medium	High	Medium	MEDIUM
<b>PERFORMANCE</b>	Medium	Medium	Medium	MEDIUM
<b>OVERALL</b>		<b>MEDIUM</b>		

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has a system in place that includes a formal process to determine Applicable Laws and legal requirements and to raise awareness among all relevant personnel. The Entity ensures continuing Compliance through a formal annual compliance review.
1.2 Anti-Corruption	Conformance	The Entity has Anti-Bribery, Corruption and Anti-Fraud Policies that are communicated throughout the Entity to work against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. These Policies are reviewed annually.
1.3a-e Code of Conduct	Conformance	<p>The Entity has a documented and regularly reviewed Code of Conduct, which is widely communicated and made aware to all as a minimum expectation for working in the Entity. It includes principles relevant to environmental, social and governance (ESG) related performance expectations.</p> <p>The process for updating the Code of Conduct includes a review by the Legal Department on suggestions for edits and updates, distribution to shareholders (Hydro Aluminium and QatarEnergy) for policy experts' feedback, and presentation to the Qatalum Board of Directors for approval. The same review and approval process is followed for all documentation that requires Board approval. The Code is available at:</p> <p><a href="https://www.qatalum.com/AboutUs/Sustainability/Documents/QTLM_Code%20of%20Conduct%20Booklet%20V3.pdf">https://www.qatalum.com/AboutUs/Sustainability/Documents/QTLM_Code%20of%20Conduct%20Booklet%20V3.pdf</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity ensures the implementation and upkeep of a corporate Health, Safety, and Environment (HSE) Policy and a Corporate Social Responsibility (CSR) Directive in alignment with relevant industry standards. The senior management has approved the HSE and CSR Policies and consistently evaluates them to facilitate the allocation of resources for their effective implementation. Internally, the Entity communicates these Policies, while external communication is tailored to the type and scope of Stakeholders associated with the Entity's activities.
2.2a-c Leadership	Conformance	The Entity has appointed the Environment and Sustainability Manager as having overall responsibility and authority for ensuring Conformance with the ASI Performance Standard as stated in the issued job description.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented, implemented and is maintaining a HSE Management System as per ISO 14001 and ISO 45001 standards, which is certified by an external third party auditor.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established a Worker Welfare Management System to ensure it is managing Human Rights risks. The Entity has committed to establish, implement, maintain, and continually improve its Worker Welfare System to promote respect for the Human Rights of employees, consumers, and communities and to perform Due

CRITERION	RATING	COMMENT
		Diligence on Human Rights impacts of its operations, as guided by the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established a Supply Chain Directive aimed at mitigating risks related to Human Rights violations, Labour Rights infringements, and environmental impacts within its supply chain. The Entity has implemented systems aligned with international guidelines such as the OECD Guidance and UN Guiding Principles. They have initiated a process to screen and assess suppliers, including a commitment to responsible sourcing principles, ESG risk assessment, ESG questionnaires, and third party supplier audits. This framework applies to all the Entity's vendors and adopts a risk-based approach. The Responsible Sourcing Policy, developed in 2023, aligns with the publicly available Supplier Code of Conduct:</p> <p><a href="https://eprocurement.qatalum.com/Suppliers/Documents/Supplier%20Code%20of%20Conduct%20Final%20April%202023.pdf">https://eprocurement.qatalum.com/Suppliers/Documents/Supplier%20Code%20of%20Conduct%20Final%20April%202023.pdf</a></p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has conducted a detailed Environmental Impact Assessment (EIA) which covers environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis prior to the construction process. In addition, the Entity has implemented effective controls based on a mitigation hierarchy for all impacts related to environmental, social, cultural and Human Rights aspects identified.</p> <p>Whilst not considered a Major Change, the Entity underwent an EIA process in 2023 associated with the current project to increase production (via line amperage). The EIA was submitted to the Ministry of Environment and Climate Change for approval.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has conducted a detailed Environmental Impact Assessment (EIA) which covers environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis prior to the construction process. In addition, the Entity has implemented effective controls based on a mitigation hierarchy for all impacts related to environmental, social, cultural and Human Rights aspects identified.</p> <p>Whilst not considered a Major Change, the Entity underwent an EIA process in 2023 associated with the current project to increase production (via line amperage). The EIA was submitted to the Ministry of Environment and Climate Change for approval.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has emergency response and evacuation plans developed in collaboration with potentially affected Stakeholder groups such as the Meseaieed Industrial City (MIC), nearby industries, Workers and their representatives. The Entity's Emergency Response Plan is disclosed in the Sustainability Report 2021, pages 81-83:</p> <p><a href="https://www.qatalum.com/Lists/Publications/2022/QTLM_Sustainability%20Report_2021_Vs%2073.pdf">https://www.qatalum.com/Lists/Publications/2022/QTLM_Sustainability%20Report_2021_Vs%2073.pdf</a></p>

CRITERION	RATING	COMMENT
2.8a-d Suspended Operations	Conformance	The Entity has a comprehensive and systematic Enterprise Risk Management (ERM) system to protect its operations from unplanned disruptions. The ERM system includes a communication and consultation process, scope, context, and criteria establishment, risk assessment, risk treatment, and monitoring and review. The communication and consultation process ensures that different areas of expertise are brought together to consider different views during the risk assessment, and relevant interested parties are consulted at all stages of the risk management system. This helps in ensuring that potential risks are identified and understood, and that objectives are better understood and considered.
2.9a-b Mergers and Acquisitions	Conformance	While the Entity cannot engage in any scope of merger or acquisition being a Joint Venture smelter project, it has committed to a Due Diligence process including environmental, social and governance issues in case any mergers and acquisitions are undertaken under the control of the Entity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has addressed all requirements related to the management of closure, decommissioning and divestment needs as they arise from the business strategy. The Joint Venture Agreement also includes a review of environmental, social and governance issues in the planning process.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has publicly disclosed its 2021 Sustainability Report on its website, which discloses the governance approach and its Material environmental, social and economic impacts:  <a href="https://www.qatalum.com/Lists/Publications/2022/QTLM_Sustainability%20Report_2021_Vs%2073.pdf">https://www.qatalum.com/Lists/Publications/2022/QTLM_Sustainability%20Report_2021_Vs%2073.pdf</a></p> <p>Additionally, the updated Sustainability Report - Disclosures 2022 has recently been made publicly available to provide more current information on the Entity's disclosure of their ESG performance:  <a href="https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf">https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has publicly disclosed information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in its Sustainability Report 2022, page 14:  <a href="https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf">https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf</a></p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has captured all payments made to governments on a legal and/or contractual basis in the Annual Financial Report. The Entity's management is committed to complying with all Applicable Laws and ethical principles. In addition, the Entity has a General Payable Procedure for any permitted payments to other governments. The Entity pays legal and obligatory payments related to taxes and duties. More information on tax obligations and transactions can be found in the Sustainability Report.</p> <p>The Entity has implemented its Code of Conduct and explicitly prohibits financial or other contributions to political entities or political activities, refer to page 15:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.qatalum.com/AboutUs/Sustainability/Documents/QTLM_Code%20of%20Conduct%20Booklet%20V3.pdf">https://www.qatalum.com/AboutUs/Sustainability/Documents/QTLM_Code%20of%20Conduct%20Booklet%20V3.pdf</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented accessible, transparent, understandable and culturally and gender-sensitive Complaints Resolution Mechanisms that are adequate to address Stakeholder complaints, grievances and requests for information relating to its operations. Through the Code of Conduct, the Entity has shared the contact information for Stakeholders to report any concerns or complaints, refer to page 7:</p> <p><a href="https://www.qatalum.com/AboutUs/Sustainability/Documents/QTLM_Code%20of%20Conduct%20Booklet%20V3.pdf">https://www.qatalum.com/AboutUs/Sustainability/Documents/QTLM_Code%20of%20Conduct%20Booklet%20V3.pdf</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity utilises a Life Cycle Analysis diagram to illustrate the progression of raw materials such as Alumina, pitch, coke, and electricity as they move through the smelting process, Casting, and eventually culminate in the final Product.</p> <p>A more detailed LCA study is currently underway.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity's Customer Technical Service function fulfils all customer requests including provision of adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium (containing) product(s), when requested. The Entity has not made any public communication on LCA to date. The Entity has a process that would provide public access to the LCA information and its underlying assumptions including system boundaries where necessary.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity considers recovery targets on an annual basis for different grades of Products to minimise the generation of Process Scrap. The Entity re-uses/recycles 100% of the generated Scrap in a controlled manner. The Entity separates Scrap of different alloys and grades for recycling. The Scrap is kept in bins which are provided with a barcoded label that provides the alloy code.</p>
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.
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity has plans in place to engage with local collection and recycling systems in Qatar to support accurate measurement and efforts to increase recycling rates for their Products containing Aluminium.</p>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity has disclosed its Greenhouse Gas (GHG) emissions and energy use in the Sustainability Report – Disclosures 2022, pages 3–5:</p>



CRITERION	RATING	COMMENT
		<a href="https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf">https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf</a>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as it commenced Aluminium production before 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	The Entity has demonstrated that the average Direct and Indirect (Scopes 1 and 2) Emissions are below 8 tonnes CO <sub>2</sub> e per metric tonnes of Aluminium. With the inclusion of Scope 3 GHG emissions, the Entity's Mine to Metal emissions are below 11 t CO <sub>2</sub> e/t Al.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity has established, implemented and published time-bound GHG emissions reduction targets and implemented a GHG Emissions Reduction Plan to achieve these targets, which are in line with the Qatar National Vision 2030. The Entity's ESG Strategy was approved in December 2023 and Intermediate Targets were approved. The GHG emissions targets address major Material sources of Direct and Indirect GHG Emissions.</p> <p>However, the Entity has not demonstrated the methodology used to align its GHG Emissions Reduction Pathway, nor disclosed the Pathway.</p>
5.4 GHG Emissions Management	Conformance	The Entity operates its Environmental Management System in accordance with ISO 14001:2015 that has adequate evaluation procedures and operating controls to limit Direct GHG Emissions. Specifically, the Entity's carbon management is guided by their internal GHG Accounting and Reporting Plan.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	The Entity has quantified its Emissions to Air that have potential adverse effects on humans and/or the environment and has established programs for the reduction of these emissions in line with local regulations and their own standards. The Entity has reported the Emissions to Air in the Sustainability Report – Disclosures 2022, page 4: <a href="https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf">https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf</a>
6.2a-g Discharges to Water	Conformance	The Entity discharges cooling and scrubbing water used in the Power Plant and the Fume Treatment Plants to sea and has a system to quantify and report these discharges. The Entity's Environmental Management System addresses controls needed to minimise adverse effects and compliance with applicable regulatory requirements. The Entity publicly reports the Discharges to Water in the Sustainability Report – Disclosures 2022, page 6: <a href="https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf">https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf</a>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has assessed the areas where Spills or Leakages may potentially occur through a risk assessment and registry process. The Entity maintains an Environmental Management System that has adequate procedures to prevent and detect Spills and Leakages. Bore wells for groundwater monitoring are available and are being tested periodically as per legal requirements.

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity's Environmental Management System has adequate procedures for reporting of Spills internally and externally to Stakeholders and regulators. The Entity has publicly reported there were no significant Spills during 2022 in the Sustainability Report – Disclosures 2022, page 10:</p> <p><a href="https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf">https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf</a></p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste management strategy taking into consideration the Waste Mitigation Hierarchy. Ongoing projects the minimise Waste generation and improve Waste recycling are implemented. The Entity has published data on the quantity of Hazardous and Non-Hazardous Waste generated and its Waste management in the Sustainability Report – Disclosures 2022, page 10:</p> <p><a href="https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf">https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf</a></p>
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	<p>The Entity has developed a long term strategy to manage Spent Pot Lining (SPL) waste handling and recycling/disposal. The Entity has five year strategic plans for pot relining and SPL recycling that aim to optimise the processes for the recovery and recycling of carbon and refractory materials, segregating SPL materials and recycling in other industries as an energy supplement. The Entity does not landfill Untreated SPL and hence there is no potential for adverse environmental effects that may arise from landfilling.</p> <p>The Entity has both short term and long term strategies that are reviewed both monthly and annually for options to increase SPL recycling rates. The Entity does not landfill SPL as it does not undertake treatment of SPL. The Entity does not discharge SPL to marine and aquatic environments. This position is confirmed via Policies and procedures.</p>
6.8a-d Dross	Conformance	<p>The Entity treats its Dross produced from the Casthouse by sending it to an external recycling company and the recovered Aluminium is used in the Entity's Casthouse. The Entity has demonstrated that they have considered alternative plans and options to landfilling of Dross residues. While the current recycling partner operates abroad, a contract has been awarded to a local company to implement this processing facility project to serve as the long term solution for Dross management.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has mapped its water withdrawal and use by source and type. Seawater usage is monitored and reported in the Sea Water Balance Report. The freshwater usage is monitored and reported in the Utilities Water Balance Report. The Entity has assessed water-related risks in their Area of Influence as part of the EIA and technical and enterprise risk assessment processes. Sources of water withdrawal and manner of recycling or discharge are disclosed in the Sustainability Report – Disclosures 2022, page 6:</p> <p><a href="https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf">https://www.qatalum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf</a></p>

CRITERION	RATING	COMMENT
7.2a-e Water Management	Conformance	The Entity has implemented suitable water management plans, with time-bound targets that address Material risks identified through the enterprise risk assessment process.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact 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 Area of Influence through a specialist third party consultant. The scope of the study included setting a terrestrial and marine Biodiversity baseline, critical habitat assessment, the consideration of necessary mitigation efforts and opportunities for enhancements. The Entity has submitted an Environment Impact Assessment (EIA), undertaken in 2023 by a third party, to the Ministry of Environment and Climate Change for approval. The site visit to various facilities within the plant revealed no visible impacts on Biodiversity.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	<p>The Entity's Biodiversity risk assessment included thorough surveys of terrestrial and marine ecosystems, evaluating potential impacts on flora, fauna, endangered species, and sensitive ecosystems. It addressed habitat loss from construction activities, as well as noise, dust, and sedimentation effects on marine life. Proposed mitigation measures and monitoring plans aim to minimise impacts and protect Biodiversity. Legal protection and conservation status of habitats and species are taken into account, with the overarching goal of carefully evaluating and mitigating the project's environmental impact on Biodiversity to ensure minimal adverse effects.</p> <p>The EIA determined that there are no Priority Ecosystem Services.</p>
8.2a-g Biodiversity Management	Minor Non-Conformance	<p>The Entity's Biodiversity Action Plan involves proactive measures to minimise the impact of its operations on terrestrial and marine ecosystems, as well as a commitment to supporting Biodiversity conservation efforts through financial contributions and collaboration with relevant ecological conservation bodies. The Entity has already established a constructive Biodiversity Action Plan designed in accordance with the Biodiversity Mitigation Hierarchy.</p> <p>However, a time-bounded implementation plan remains underdeveloped.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the EIA determined that there are no Priority Ecosystem Services. The Qatalum plant site and port are located in an existing heavily industrialised area with, for the most part, little reported vegetation or areas of ecological significance.
8.4 Alien Species	Conformance	The Entity has conducted an EIA through a specialised third party consultant. The scope included an assessment of accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. The existing controls were considered sufficient to mitigate the risk of the introduction of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	While the Entity does not operate in World Heritage Properties and has no short-term or medium-term plans to explore more areas for operation expansion, the Entity respects the universal value for which

CRITERION	RATING	COMMENT
		these properties are listed, and the Entity's future operations will not put the integrity of these properties at risk.
8.6a-d Protected Areas	Conformance	Based on the Entity's EIA report, none of the habitats or areas within the site or in the vicinity of the site are legally protected, nor have they been nominated for inclusion as Biosphere Reserves according to studies by UNESCO for the Supreme Council for the Environment and Natural Reserves (SCENR).
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.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has established and implemented a Corporate Social Responsibility (CSR) Directive including a Policy commitment to respect Human Rights. The Entity has a Worker Welfare Program comprising various documents and programs. The CSR Directive is well supported by the Human Rights Policy, Supply Chain Directive, Supplier Code of Conduct and supporting documents in terms of the implementation of processes needed to protect Human Rights. The Human Rights Policy is publicly disclosed, available at: <a href="https://www.qatalum.com/AboutUs/Sustainability/Documents/Human%20Rights%20Policy.pdf">https://www.qatalum.com/AboutUs/Sustainability/Documents/Human%20Rights%20Policy.pdf</a>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a Gender Equity and Women's Empowerment Program, which is designed to promote gender equality, protect Human Rights, and empower women within the organisation and the broader community. The program includes but is not limited to the following principles: Non-Discrimination; Gender Equity; Gender Equality Promotion; Violence and Harassment Free Workplace; Access to Education and Training; Externally Evaluated Job Grading; Salary Band Based Compensation; Community Engagement; and Raising Awareness. The Entity internally tracks the effectiveness of the program and is establishing how it can align the disclosure of the program with the agreement of its government shareholder. Women employee data are disclosed in the Sustainability Report: <a href="https://www.qatalum.com/Lists/Publications/2022/OTLM_Sustainability%20Report_2021_Vs%2073.pdf">https://www.qatalum.com/Lists/Publications/2022/OTLM_Sustainability%20Report_2021_Vs%2073.pdf</a>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, territories or resources identified.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, territories or resources identified.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples or their lands, territories or resources identified.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence and there are no Indigenous Peoples or their lands, territories or resources identified. The Entity is based in a dedicated industrial area.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence and there are no Indigenous Peoples or their lands, territories or resources identified. The Entity is based in a dedicated industrial area.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the Entity joined ASI nor social impacts that required Resettlement at the time of plant construction.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has participated in local industrial community meetings and operates in accordance with local obligations to respect the legal and customary rights and interests of Local Communities. The Entity participates in the Mesaieed Industrial City (MIC) Environment Sub-Committee meeting together with other organisations in the industrial city as a collaborative mechanism to discuss and address any concerns.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has Policies and controls in place for not contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Responsible Sourcing Policy, developed in 2023, aligns with the publicly available Supplier Code of Conduct: <a href="https://eprocurement.qatatum.com/Suppliers/Documents/Supplier%20Code%20of%20Conduct%20Final%20April%202023.pdf">https://eprocurement.qatatum.com/Suppliers/Documents/Supplier%20Code%20of%20Conduct%20Final%20April%202023.pdf</a>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Entity has established a Code of Conduct and Sponsorship Donation and Supply Chain Directives that are well communicated and implemented to prevent contributing to armed conflict or Human Rights abuses in CAHRAs either directly or through the supply chain.</p> <p>The Entity maintains a register for Sanctions and Conflict-Affected High-Risk Areas and any procurement from these areas receives additional Due Diligence through the Legal Department. Without limiting the foregoing, the Entity's general policy is that it does not source from CAHRAs.</p> <p>With the support of an external agency that specialises in assessments of the supply chains, the Entity has completed key strategic supply chain assessments and is in the process of completing its supply chain mapping and a materiality and risk assessment.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>The Entity has established a Code of Conduct and Sponsorship Donation and Supply Chain Directives that are well communicated and implemented to prevent contributing to armed conflict or Human Rights abuses in CAHRAs either directly or through the supply chain.</p> <p>The established management procedures comprise: 1. Supply chain risk screening; 2. A phased supplier Due Diligence approach (both desk-based and, where necessary, site-based); 3. Risk identification</p>

CRITERION	RATING	COMMENT
		measures and controls in a form of initial assessment based on supplier activity and geographical location; 4. Requests for further information for potential high risks suppliers through the use of a bespoke ESG questionnaire; 5. Qatalum, Hydro and a third party to lead Due Diligence investigations of potential or existing supply chain partners to enable Qatalum's further understanding of potential degree of risk; 6. Internal management accountabilities with clear roles assigned; 7. Requirement for new and existing suppliers to conduct their business in a manner commensurate with Qatalum's responsible sourcing policies' priorities; 8. Provision of a grievance reporting mechanism available to Qatalum's business partners.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity follows risk-based Due Diligence over its supply chain in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). Risks related to CAHRAs are mapped including functions, relevant business units, risk descriptions, likelihood, and description and effectiveness of existing controls.</p> <p>The Entity's Due Diligence practices have been audited as part of this ASI Audit.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity has been conducting its CSR screening and regular audits of its contractors and suppliers to ensure that they uphold the local legislations on Human Rights and the rules outlined in the Universal Declaration of Human Rights. A general outlook of the results of these audits is disclosed in the Entity's Sustainability Report 2021: <a href="https://www.qatalum.com/Lists/Publications/2022/QTLM_Sustainability%20Report_2021_Vs%2073.pdf">https://www.qatalum.com/Lists/Publications/2022/QTLM_Sustainability%20Report_2021_Vs%2073.pdf</a></p>
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity has engaged a private security service provider and ensures that security practices including the Voluntary Principles on Security and Human Rights, are adhered to.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	<p>This Criterion is not applicable to the Entity as it currently respects Freedom of Association and the right to Collective Bargaining in accordance with Applicable Law in Qatar.</p> <p>However, the Entity neither promotes nor rejects the rights of Workers to associate freely in Labour Unions, seek representation and join Workers' councils without interference to the extent possible under Applicable Law. ILO Conventions are not ratified by the State and hence not considered. There are no agreements for Collective Bargaining at the Entity. Though the Applicable Law has provisions for such agreements, this has not been practiced by Workers as a choice. The Entity has a commitment to respect the rights of Workers to Collective Bargaining, participate in any Collective Bargaining process in good faith, and adhere to collective bargaining agreements where they exist.</p>
10.1d Freedom of Association and Right to Collective Bargaining -	Conformance	The Entity supports alternative means of association for Workers such as HSE Committees and employs a range of mechanisms, including town hall meetings, hazard and incident reporting, grievance reporting

CRITERION	RATING	COMMENT
Alternative means in context of Applicable Law		mechanisms for both employees and contractors, as well as HSE forums for gathering feedback and suggestions from Stakeholders.
10.2a Child Labour	Conformance	The Entity has implemented Policies and employment regulations to prevent the hiring of Child Labour. The Entity ensures the enforcement of this Policy throughout its supply chain by requiring suppliers to declare their commitment to these principles. The Policies neither use nor support the use of Child Labour, including the Worst Forms of Child Labour, as defined in ILO Conventions C138 and C182, and comply with related national and international law. The minimum age of employment is 21.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity has robust Policies and controls in place to prevent Human Trafficking, whether it occurs directly or through recruitment agencies. The Entity maintains well-established Policies, including a Supplier Code of Conduct, that prohibit collecting any form of Deposit or Recruitment Fee from its employees, whether through direct means or via recruitment agencies; holding Workers in Debt Bondage; restricting Workers' freedom of movement in the workplace or housing; retaining passport or other personal documents; and denying Workers the freedom to terminate their employment. The Supplier Code of Conduct is available at:  <a href="https://eprocurement.qatalum.com/Suppliers/Documents/Supplier%20Code%20of%20Conduct%20Final%20April%202023.pdf">https://eprocurement.qatalum.com/Suppliers/Documents/Supplier%20Code%20of%20Conduct%20Final%20April%202023.pdf</a></p> <p>The Entity has established an Accommodation Standard for Workers based in Qatar that includes the provision of housing, food, laundry, recreational facilities, transportation to shopping areas, internet access and other elements to ensure the health, safety, and welfare of employees. Contractor compliance with these standards is monitored by the Entity and supported by contractual provisions.</p> <p>The Entity has included a statement in the Sustainability Report on its commitment to safeguarding Human Rights, including Forced Labour and Human Trafficking, and prepared a Human Rights Statement available on its website. These are disclosed at:  <a href="https://www.qatalum.com/Lists/Publications/2022/QTLM_Sustainability%20Report_2021_Vs%2073.pdf">https://www.qatalum.com/Lists/Publications/2022/QTLM_Sustainability%20Report_2021_Vs%2073.pdf</a> and  <a href="https://www.qatalum.com/AboutUs/Sustainability/Pages/Social.aspx">https://www.qatalum.com/AboutUs/Sustainability/Pages/Social.aspx</a></p> <p>However, the Entity has not provided an annual Modern Slavery Statement that includes how the Entity has addressed its risks of modern slavery, the actions taken and actions proposed in future.</p>
10.4a-c Non-Discrimination	Conformance	The Entity has committed in its Code of Conduct to the fair treatment of employees and to creating a workplace free from any form of Harassment. Non-Discrimination is addressed in the Entity's Code of Conduct and training is provided to all employees. In addition to annual reviews, the Compliance Manager delivers periodic refresher training to all employees.
10.5 Communication and engagement	Conformance	The Entity has adequate processes and mechanisms governed by its Code of Conduct to ensure open communication and direct engagement with Workers regarding working conditions and the resolution of workplace and compensation issues. An open dialogue culture is visible where Workers can express their concerns without threat of reprisal, intimidation or harassment supported by grievance management procedure.

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	The Entity maintains transparent disciplinary procedures that are aligned with national labour laws. Disciplinary actions are carried out impartially through the employee relations process. The Entity has a documented and formal disciplinary process that neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual Harassment, or verbal abuse of Workers. Disciplinary action is provided in a uniform and fair manner. Violence and Harassment are addressed in the Entity's Code of Conduct and training is provided to all employees: <a href="https://www.qatatum.com/AboutUs/Sustainability/Documents/QTLM_Code%20of%20Conduct%20Booklet%20V3.pdf">https://www.qatatum.com/AboutUs/Sustainability/Documents/QTLM_Code%20of%20Conduct%20Booklet%20V3.pdf</a>
10.7a-c Remuneration	Conformance	The Entity performs periodic compensation benchmarking analysis and reviews its compensation respecting the rights of Workers to a living wage and ensuring that wages paid for a normal working month are consistent with or above the industry standard. Monetary compensation includes salary and other discretionary allowances. The Entity has adequate processes and controls to make wage payments that are timely, in legal tender and fully documented and shared with employees in payslips.
10.8a-c Working Time	Conformance	The Entity provides its employees with access to the Human Resources Policy Manual through the Entity's intranet. This Policy outlines details such as normal working hours (40 hours per week), Overtime regulations, days off, public holidays, annual leave entitlements, and other relevant information, all in accordance with local laws. The Entity implements effective processes and controls to ensure Compliance with Applicable Law and the Entity's standard on Working Time (including Overtime working hours), public holidays, paid annual leave and other leave entitlements as per the Human Resources Policy Manual.
10.9a-b Informing Workers of Rights	Conformance	The Entity, through its Human Resources department, informs new Workers about their rights and how the organisational Policies provide protection of their rights and assistance to assert their rights.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity is ISO 45001:2018 certified. The Entity has documented and implemented an Environmental, Health and Safety (EHS) Management System that is in conformance with applicable national and international standards including ISO 14001 and ISO 45001.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity's EHS Management System is ISO 45001 certified and conforms with requirements for review. The Entity's Occupational Health and Safety (OH&S) performance data and information are disclosed in the Sustainability Report – Disclosure 2022, pages 13-14: <a href="https://www.qatatum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf">https://www.qatatum.com/SiteCollectionDocuments/QTLM_2022_Sustainability_Report_Environment%20Disclosure%201.pdf</a>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has provided employees with various mechanisms such as joint health and safety committees, by which they can raise, discuss, and participate in the resolution of OH&S issues with management.



### ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 April 2022	Initial Certification Audit – Full Certification
1	28 March 2024	Re-Certification and Scope Change Audit – Full Certification Scope Change to apply ASI PS V3

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