

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Ulsan Aluminum Ltd

CERTIFICATE NUMBER
401

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

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

DATE OF ISSUE
26 OCTOBER 2024

DATE OF EXPIRY
25 OCTOBER 2027

CERTIFIED SINCE
26 OCTOBER 2021

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
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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

The Certification Scope covers all activities at Ulsan Aluminum Ltd in Ulsan, South Korea, including the manufacture of Aluminium and Aluminium coil and sheet specifically for automotive, can and specialty products.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc. and Kobe Steel, Ltd.
ENTITY NAME	Ulsan Aluminum Ltd
CERTIFICATION SCOPE	The Certification Scope covers all activities at Ulsan Aluminum Ltd in Ulsan, South Korea, including the manufacture of Aluminium and Aluminium coil and sheet specifically for automotive, can and specialty products.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (13 – 17 September 2021)Surveillance Audit (3 – 5 April 2023)Re-Certification Audit and Scope Change (23 – 27 September 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">13 – 17 September 2021 (Initial Certification Audit)3 – 5 April 2023 (Surveillance Audit)23 – 27 September 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">30 September 2021 (Initial Certification Audit)19 April 2023 (Surveillance Audit)16 October 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (13 – 17 September 2021)</u></p> <p>The audit scope includes all activities at Ulsan Aluminum Ltd. in Ulsan, South Korea, including the manufacture of Aluminium and Aluminium coil and sheet specifically for automotive, can and specialty products.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (3 – 5 April 2023)</u></p> <p>The audit scope includes all activities at Ulsan Aluminum Ltd. in Ulsan, South Korea, including the manufacture of Aluminium and Aluminium coil and sheet specifically for automotive, can and specialty products.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/Refining

-
- Casthouses
 - Material Conversion (Production and Transformation)

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

Re-Certification Audit and Scope Change (23 – 27 September 2024)

The audit scope includes all activities at Ulsan Aluminum Ltd. in Ulsan, South Korea, including the manufacture of Aluminium and Aluminium coil and sheet specifically for automotive, can and specialty products.

Supply chain activities included in the Audit Scope:

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

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

AUDIT OUTCOME

- 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

26 October 2024 – 25 October 2027

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

25 May 2026

CERTIFICATE NUMBER

159



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

Ulsan Aluminum (the 'Entity') was established in September 2017 as a joint venture between Novelis and Kobe Steel.

The Entity's operations – casting, hot and cold rolling, and finishing – produce flat-rolled Aluminium products used primarily in automotive, building and construction, beverage can market, and multiple other industrial applications. In 2023, the Entity produced 283,200 tons of Aluminium flat-rolled products.

The Ulsan facility covers approximately 37 hectares and has approximately 620 employees, 27 of whom are women. The facility is settled in an industrial area and includes an administration office, vehicle parking (car, motorcycle, and industrial vehicle), a warehouse, a workshop, laboratories, raw material storage, fuel and chemical storage, a cafeteria, utilities (water treatment plant and compressor), a wastewater treatment plant, and sports facilities. The Entity is currently not engaged with any new projects.

Key external stakeholders include Korea's Government/regulatory agencies, society, customers, and suppliers.

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	High	High	High	High
RISKS	Medium	Medium	Medium	Medium
PERFORMANCE	Medium	High	Medium	Medium
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, procedures, and processes to maintain awareness and ensure Compliance with Applicable Laws and respect for Customary Laws. The legal compliance registers of social, labour, ethics, environment, and Health and Safety are established to identify and maintain relevant legal regulations. Compliance audits are conducted annually, and audit results are reviewed and reported during management reviews.
1.2 Anti-Corruption	Conformance	The Entity has established policies and procedures on Anti-Corruption. Anti-Corruption is addressed in the Entity's Code of Conduct, Anti-Corruption Policy, and Supplier Code of Conduct. Annual training on the Entity's policies is provided to employees and Workers, and the Supplier Code of Conduct is signed and acknowledged by suppliers (internal and external suppliers). The Entity's Anti-Corruption Policy, Code of Conduct, Supplier Code of Conduct, Anti-Trust Policy, and Anti-Corruption Policy are accessible at: https://ulsanaluminum.com/home/vision/vision03.jsp
1.3a-e Code of Conduct	Conformance	The Entity has established and implemented its Code of Conduct and Supplier Code of Conduct, which includes principles related to environmental, social, governance, and commitment to Local Communities. Periodic review of the Entity's Code of Conduct and Supplier Code of Conduct is stated in the Entity's Code of Conduct and Supplier Code of Conduct. The Entity provides Workers with training on the Entity's Code of Conduct: https://ulsanaluminum.com/home/vision/vision03.jsp .
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established Policies, systems, procedures and processes on Environment, Social and Governance (ESG) principles reviewed periodically. The Entity has endorsement and support from Senior Management to provide sufficient resources for the regular review of the Policies consistent with the ESG practices.
2.2a-c Leadership	Conformance	The Entity has appointed Senior Management Representatives with responsibilities defined to ensure conformance with the ASI Performance Standard and the communication of relevant Environmental, Social, and Governance (ESG) Policies internally and externally. The Entity has identified and provided resources to establish, implement, maintain, and improve its ESG Management Systems.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established and implemented an Environmental Management System and holds a valid ISO 14001:2015 Environmental Management System certification.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established and maintained an integrated Social Management System Manual and Occupational Health and Safety Management System certified to ISO 45001.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented policies that are reviewed periodically and processes to address Responsible Sourcing requirements. The Entity identifies its major next-tier suppliers and conducts Due Diligence Audits with follow-up improvement actions, as required. Major suppliers must comply with the Supplier Code of Conduct, which is accessible at: https://ulsanaluminum.com/home/vision/vision03.jsp
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable, as the Entity has no New Projects or 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	This Criterion is not applicable, as the Entity has no New Projects or Major Changes to existing Facilities. However, the Entity has developed a procedure to implement and periodically review the Human Rights impacts of New Projects or Major Changes to Existing Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity has established and maintained Emergency Response Plans, collaborating with potentially affected Stakeholder groups such as communities and governmental departments. Workers, including in-house sub-contractors, are provided with relevant emergency training, and emergency drills are conducted periodically. The latest version of the Emergency Response Plans (Crisis Response) is disclosed in the Sustainability Report, Pages 18-20 and is accessible at: https://ulsanaluminum.com/home/vision/vision01.jsp
2.8a-d Suspended Operations	Conformance	As per the Entity's ASI Performance Standard Manual, business recovery/continuity programs are established to prevent situations that may lead to suspending or significantly altering operations. Periodic reviews of the emergency response plan, and business continuity programs are also established.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a documented management procedure for Mergers and Acquisitions requirements. No such activity has occurred or is planned since the Entity adopted the ASI Performance Standard.
2.10a-b Closure, Decommissioning and Divestment	Conformance	No closures, decommissioning, or divestments are planned for the Entity nor in the near future. Should such an event occur, the Entity will conduct a formal review of the environmental, social, and governance consequences of activities around closure, decommissioning, or divestment and consult, where possible, with the participation of Affected Populations and Organisations.
3.1a-b Sustainability Reporting	Conformance	The Entity's Annual Sustainability Report is issued by Novelis Global and is based on the Global Reporting Initiative (GRI) Standards and is verified by an external third-party verification body in August 2023 and includes the Entity's sustainability data. It is available at: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability

CRITERION	RATING	COMMENT
		<p>Additional disclosure information (UAL Sustainability Report) to support the Annual Sustainability Report is available at: https://ulsanaluminum.com/home/vision/vision01.jsp</p> <p>Key performance indicators and Material environmental, social, governance, and economic impacts and activities are disclosed in the reports, including its performances, interactions with the Local Community and legal compliance information.</p>
3.2 Non-Compliance and Liabilities	Conformance	<p>The Entity publicly discloses information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Laws and regulations. No cases of fines raised by the relevant government agencies are addressed in the UAL Sustainability Report (Page 29 of 37 Other Environment Information section, Page 30 of 37 Health and Safety Target and Performance section, Page 35 of 37 Compliance and Human Right section) accessible at: https://ulsanaluminum.com/home/vision/vision01.jsp</p>
3.3a-c Payments to Governments	Conformance	<p>A third-party accounting firm verifies the Entity's Financial Report, and financial results are disclosed at http://dart.fss.or.kr. Certificates of full national and local tax payments to Governments are issued and verified. The summary statement of payments to the Government and information on direct or indirect value and beneficiaries of financial and in-kind political contributions are publicly disclosed in the Entity's UAL Sustainability Report, Page 35 of 37 Compliance and Human Rights section, accessible at: https://ulsanaluminum.com/home/vision/vision01.jsp</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity's internal and external complaints or grievance reporting mechanisms (e.g. hotlines, grievance handling council, public website, anonymous grievance box installed at the Entity) are established, and relevant information is accessible at: https://ulsanaluminum.com/home/vision/vision06.jsp.</p> <p>A register of reported cases of grievance/whistleblowing is maintained.</p>
4. Material Stewardship		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has conducted a 'cradle-to-grave' LCA report that is based on ISO 14040:2006 Environmental Management, Life Cycle Assessment, Principles and Framework Standard. An external third party completed the LCA which addresses the Entity's final products (industrial products, automotive, and can)..</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The LCA report can be provided upon request. However, there have been no requests for LCA data to date. The Entity's LCA report has been prepared in Korean and is publicly available at: https://ulsanaluminum.com/home/vision/vision01.jsp</p>
4.2 Product Design	Conformance	<p>The Entity does not directly design its products. However, relevant objectives and activities in the design and development phase of the production process to enhance Circular Economy (CE) outcomes are established and controlled based on the Entity's ASI Performance Standard Manual and Objective and Program Management Procedure.</p>

CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	The Entity's Aluminium Process Scrap is 100% collected and reused, as detailed in the Entity's Scrap Collection Standard and Sustainability Report. Process Scrap is collected from production facilities and reused in the Entity. The Entity has established a 100% Scrap collection, recycling, and reuse target. It separates Aluminium alloys per the Entity's Scrap Collection Standard and Scrapyard Operation Procedure.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>The Entity is committed to increasing the use of Recycled Scrap and decreasing the use of primary ingot and slab, as stated in the Entity's Recycling Strategy Plan.</p> <p>https://www.novelis.com/novelis-3x30/</p> <p>The Entity has established a recycling target for Scrap material production, and targets are monitored periodically. The detailed project strategy is addressed in the Entity's Green Bond Report, 5 of 12:</p> <p>https://ulsanaluminum.com/home/intro/intro04.jsp?bdMode=view&datald=BDATA000000010000039&retUrl=&pageIndex=1&searchCondition=&searchKeyword=&searchCategory=</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	There is no mandated local or national collection or use of Aluminium Scrap in Korea. As per the Entity's Recycling Strategy, the Entity has its recycling systems and plans to increase and implement recycling rates by expanding its recycling centre, which is planned to start in 2025. The Entity also plans to use more Scrap material and engage with Scrap suppliers (e.g. a plan to produce 100,000 tonnes of recycled Scrap ingot).
5. GHG Emissions		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity is incorporated into the Greenhouse Gas (GHG) Emission Trading Scheme regulated by the Korean Government. Direct and Indirect GHG Emissions and Energy used by the source are tracked, calculated and documented. The Entity's GHG Emissions and Energy use are verified annually by an accredited third party, and independent verification reports are available. Material Energy use and GHG Emissions by source (Scope 1, 2 and Scope 3 Category 1) are disclosed in the Sustainability Report, Page 24:</p> <p>https://ulsanaluminum.com/home/vision/vision01.jsp</p> <p>Material Energy use and GHG Emissions are also disclosed in the Novelis Global Sustainability Report, Page 72:</p> <p>https://www.novelis.com/sustainability/</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.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity's Low Carbon Strategy is aligned with a 1.5°C warming scenario (Net Zero by 2050), Greenhouse Gas (GHG) Emissions Reduction Plans (i.e. 30% reduction by 2022 to 2026 based on 2016 baseline year) and reduction pathways for Scope 1, 2 and 3 (Category 1) are established and controlled. An annual GHG Emissions reduction target plan and reduction pathway are reviewed, monitored and disclosed via the use of the ASI Calculation Tool. The Entity's latest GHG Emission Reduction Plan, including the Net Zero Policy by 2050, are disclosed in its Sustainability Report, Page 24.</p> <p>https://ulsanaluminum.com/home/vision/vision01.jsp</p> <p>However, the Entity's reduction pathway has no established plan beyond 2025 and there are currently no short, intermediate and long-term targets to conform.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has developed and maintained a GHG Management Procedure associated with GHG Emissions and Energy use, controls, and monthly monitoring to achieve performance aligned with the plan. Periodic internal audits against the Entity's GHG Management System are conducted, and relevant improvement actions are taken. Progress on achieving reduction targets is monitored annually, and further improvement plans are established and monitored.</p>
6. Emissions, Effluents and Waste		
6.1a-f Emissions to Air	Conformance	<p>The Entity's Environmental Impact Assessment identifies and quantifies Air Emission pollutants. The re-melting process is a major source of fugitive dust, and scrubbers are used to mitigate air pollutants. Qualified, responsible persons record the daily operation of air emission facilities. Emission reduction plans are reviewed annually. Air Emissions have not exceeded legal emission limits since 2001. Annual Air Emissions targets and volumes by pollutants and management plans are disclosed in the Entity's Sustainability Report, Page 25:</p> <p>https://ulsanaluminum.com/home/vision/vision01.jsp</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity operates a wastewater treatment plant on its premises. It has established water reduction targets and plans that are reviewed periodically to minimise adverse environmental impacts. Since 2001, no cases of wastewater exceeding legal limits or environmental accidents related to water discharge have been reported. The Entity's water discharge targets, performance, and the latest plans are accessible in the Entity's Sustainability Report, Page 26:</p> <p>https://ulsanaluminum.com/home/vision/vision01.jsp/</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has conducted an Environmental Impact Assessment and an Off-Site Risk Assessment where Spills and Leakages may contaminate air, water, and soil. Following the Environmental Impact Assessment and Off-site Risk Assessment, the Entity has established control plans reviewed periodically to prevent Spills and Leakages. The Entity's control plans are disclosed in the Entity's Sustainability Report, Page 27:</p> <p>https://ulsanaluminum.com/home/vision/vision01.jsp</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity's Procedure for Emergency Response discloses information to Affected Populations and Organisations and informs them of the spill's impact and the incident's leakages. The Impact Assessments of</p>

CRITERION	RATING	COMMENT
		Spills and/or Leakages and remediation actions taken are published, and there have been no reported cases of Spills and/or Leakages within the last three years. Related information is available on Pages 27 and 28: https://ulsanaluminum.com/home/vision/vision01.jsp
6.5a-c Waste Management and Reporting	Conformance	The Entity has established a landfill reduction target and implemented plans based on the Waste Mitigation Hierarchy. General and Hazardous Wastes are transferred and disposed of by qualified external vendors which are monitored by the Entity. The quantities and disposal of Hazardous Waste generated by the Entity are reported to the government websites at www.env-info.kr and https://allbaro.or.kr . Information on landfill reduction targets of Hazardous and Non-Hazardous Waste with associated disposal methods is available in the Entity's Sustainability Report, Page 29: https://ulsanaluminum.com/home/vision/vision01.jsp .
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	Conformance	The Entity has established a Dross Handling Procedure, including targets to minimise Dross generation set and controlled, the Entity's generated Dross is sold to an external Dross processor recovery and recovered Aluminium is used in the Entity for recycling. The recovery rate from the external Dross processor is monitored periodically to maximise Aluminium recovery. Periodic meetings are held with the external Dross processor to increase the recycling rate from Dross residues and identify alternative options for recycling Dross that have not been recovered. Currently, the residual from recovered Dross becomes raw materials of deoxidiser and construction materials.
7. Water Stewardship		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity uses raw water (from the nearby Daeam dam) for production, canteen, and office administration. A water flow diagram is in place, including withdrawal and use by source and type. The Entity monitors and controls the water balance analysis. Based on the water risk assessments, the Entity's operational, internal, and external risks in their Area of Influence are considered in the Water Risk Assessment. Due to the nature of the production processes and the existing water management systems, the water-related risk has been determined as low in the local water environment. This is disclosed in the Entity's Sustainability Report, Page 25: https://ulsanaluminum.com/home/vision/vision01.jsp
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		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has developed an Environmental Aspect Analysis Procedure to assess risks and impacts on biodiversity and the ecosystem. An Off-site Risk Assessment and Environmental Aspect Assessment address biodiversity and ecosystem risks. The risks and effects of the Entity's operation within its Area of Influence were assessed as low and are reported in the Sustainability Report, Page 28: https://ulsanaluminum.com/home/vision/vision01.jsp
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 are rated low, and no Priority Ecosystem Services are identified.
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 assessed the risk to Biodiversity and Ecosystem Services as low, and no Priority Ecosystem Services were identified as it is located in an industrial complex.
8.4 Alien Species	Conformance	The Entity takes action to prevent the introduction of Alien Species that may have material adverse impacts on Biodiversity and Ecosystem Services. Wooden materials used are heat-treated to avoid the introduction of Alien Species into the Entity's premises, and the relevant heat-treatment certificates are maintained.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity has committed to a 'no go' in World Heritage Properties in its ASI Performance Standard Manual and its Risk Assessment on Labour, Human Rights, and Ethics.
8.6a-d Protected Areas	Conformance	The Entity is located within an industrial complex, and therefore the Risk Assessment for Protected Areas is rated low.
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 conducts an annual Risk Assessment on Labour, Human Rights, and Ethics, including a compliance assessment. This process involves identifying and assessing potential risks, evaluating conformity against them, implementing control measures and targets on Human Rights, and conducting periodic reviews. As a result, no adverse Human Rights impacts have been found. The Entity has mapped Affected Populations and Organisations within their supply chains. The Entity commits to respect Human Rights in the Code of Conduct and Diversity Standard, which is accessible at: https://ulsanaluminum.com/home/vision/vision03.jsp The Entity's Diversity Standard includes respect to diversity, including the provision of gender-responsive commitments regarding human rights: https://ulsanaluminum.com/home/vision/vision03.jsp

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity has established and implemented strategies and actions to increase gender diversity. Relevant key performance indicators to promote gender equity have been established, monitored and are reviewed by Senior Management annually. The Entity's Employment Regulations identify and address the legal requirements for Women's Rights, including maternity protection. Grievances received on Women's Rights are reviewed, and further actions are taken. The effectiveness of the Entity's measures to promote gender equity are disclosed in the Entity's Sustainability Report, Page 35:</p> <p>https://ulsanaluminum.com/home/vision/vision01.jsp</p> <p>However, the Entity has not disclosed the effectiveness of the gender equity measures mentioned. The Gender Equity Program indicates gaps in training opportunities and contract awarding. Additionally, there is also no reference as to how the Entity addresses gender-related professional development barriers.</p>
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 occurred 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	Not Applicable	This Criterion is not applicable, as 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 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, and no displacement or resettlement activities are necessary.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has a Policy on respecting relevant legal and customary rights and interests of Affected Populations and Organisations, including Local Communities. The Entity has conducted the relevant risk assessment and established plans that have been implemented and reviewed periodically. The Entity undertakes various activities, including charity or support activities with Affected Populations and Organisations, which are addressed in the Entity's Sustainability Report, Page 36:</p> <p>https://ulsanaluminum.com/home/vision/vision01.jsp</p>

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	Novelis Korea controls Conflict Mineral Management, and the Entity has established Policies on conflict minerals as addressed in the Conflict Minerals Declaration, Supplier Code of Conduct, and Conflict Minerals Report. The Entity's suppliers must comply with the requirements of conflict minerals (Novelis Procurement Terms and Conditions). Roles, responsibilities, and the Due Diligence process for suppliers, including a risk assessment, are established. The Supplier Code of Conduct is available at: https://www.novelis.com/suppliers and the Conflict Mineral Declaration is accessible at: https://ulsanaluminum.com/home/intro/intro04.jsp?bdMode=view&datald=BDATA000000010000041&retUrl=&pageIndex=1&searchCondition=&searchKeyword=&searchCategory=
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has assessed the risk of conflict minerals in the relevant supply chains. The risk assessment includes potential risks of involvement in armed conflict or Human Rights abuses, and relevant risks are identified, assessed and rated. Risks identified of participation in armed conflict or Human Rights abuses have been rated as low.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a strategy to respond to the identified risks against conflict minerals included in the Conflict Minerals Report. 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 summarised in the Entity's Conflict Minerals Management Report.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices are audited and verified as part of the ASI Performance Standard audit process, and Due Diligence results are recorded and stated in the Entity's Conflict Minerals Management Report. This ASI Audit also satisfies this requirement of the Standard.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity's Due Diligence process and declaration of non-involvement in armed conflict or Human Rights abuses are reported in the Entity's Conflict Minerals Management Report accessible at: https://ulsanaluminum.com/home/vision/vision03.jsp
9.9 Security practice	Conformance	The Entity's security services are outsourced, and the contractor agrees to comply with the Entity's Supplier Code of Conduct. A compliance audit against the security provider was conducted, and no negative findings were issued. The security provider does not undertake direct and indirect physical searches, and does not restrict freedom of movement.
10. Labour Rights		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity is committed to respecting Freedom of Association. A Labour Union is present on site, and Union leaders and representatives are elected by Workers anonymously and directly. Workers have a right to join or not join the Labour Union. The Entity is committed to respecting Collective Bargaining Rights, and the Collective Bargaining Agreement is in place and declared to the Government within the required timeframe.

CRITERION	RATING	COMMENT
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.
10.2a Child Labour	Conformance	The Entity is committed to the prohibition of Child Labour. Any young Workers under 18 years old are managed under special protection as specified in the law, and they are not allowed to work in hazardous conditions. There is no history or current use of child Workers under 15 or younger Workers under 18 years old.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity is committed to the prohibition of Forced Labour as addressed in the Code of Conduct and Supplier Code of Conduct. Workers are not required to pay any deposit, savings, or recruitment fee. There are no foreign migrant Workers, including in-house sub-contractors. Labour contracts are agreed upon and signed between the Entity and Workers, and no terms of debt bondage labour are found. Workers' original documents are not retained and can terminate their employment with a specific notice period in advance.</p> <p>The Entity's Slavery and Human Trafficking Statement (Modern Slavery Statement) has been endorsed by Senior Management, including the Policy and the Due Diligence process: https://ulsanaluminum.com/home/vision/vision03.jsp</p> <p>However, one of the sampled labour contracts for the in-house subcontractor includes a penalty clause for workers during the probationary period, however no penalties are given in practice.</p>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to prohibiting any type of Discrimination. Its recruitment process, job advertisements and job application template indicate that decisions are solely based on the candidates' ability to meet the job requirements rather than other personal characteristics. The Entity has implemented various projects to promote Non-Discrimination, workplace diversity, and inclusion.
10.5 Communication and engagement	Conformance	Workers can freely express their concerns or complaints regarding working conditions and the resolution of workplace and compensation issues without the threat of reprisal, intimidation, Violence, or Harassment. Direct and periodic communication between the Entity and Workers and their representatives is established and implemented. Workers are aware of how to lodge complaints or report concerns.
10.6a-g Violence and Harassment	Conformance	<p>The Entity's Policy on the prohibition of Violence and Harassment is addressed in the Code of Conduct and Supplier Code of Conduct, accessible at: https://ulsanaluminum.com/home/vision/vision03.jsp</p> <p>Relevant regulations, including disciplinary regulations, are established and maintained. Policies are implemented in consultation with Workers' representatives, including quarterly labour management council meetings. 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>

CRITERION	RATING	COMMENT
10.7a-d Remuneration	Conformance	The Entity's Employment Rules and other supporting regulations regulate policies related to payments. Workers are paid at least the same as or higher than the legal minimum wage, and 150% of the ordinary wage is paid for overtime, night-time shifts, and holiday work. Workers are provided with pay slips that include details of their pay, including their base wage, Overtime wages, other allowances, calculation method, and deductions. Payments are made directly to Workers via bank transfers each month.
10.8a-c Working Time	Conformance	The Entity has developed regulations on working hours, rest, and other leave entitlements and conducted a formal risk assessment on working hours rated as low. Workers do not exceed legal working hour limits, have an average of one day off every seven days, and can freely use their annual and other leave entitlements.
10.9a-b Informing Workers of Rights	Conformance	Workers are informed of their rights described in the Entity's Code of Conduct, Collective Bargaining Agreement, Employment Regulations, Labor Contracts, and other regulations or Policies through the Entity's intranet or bulletin board.
11. Occupational Health and Safety		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System applicable to Workers, employees and Visitors and is certified to ISO45001:2018. The legal register is updated, and periodic risk assessments, internal audits and management reviews are conducted. The Entity's Occupational Health and Safety (OH&S) Policy and Code of Conduct both include a commitment to comply with legal requirements.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity periodically reviews its OH&S Policy, targets, and Occupational Health and Safety Management System performance. Internal and external communications regarding Health and Safety aspects are regulated. The effectiveness of the OH&S Management System, including lagging indicators and comparative analysis of performances with peer businesses and leading practices, are disclosed in the Entity's Sustainability Report, Pages 30-34: https://ulsanaluminum.com/home/vision/vision01.jsp
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established procedures for Workers' consultation and participation in Health and Safety aspects. Periodic Health and Safety committee meetings with labour representatives and Contractors discuss and improve Health and Safety issues, and relevant results of the committee meetings are communicated to Workers. Workers can freely report on near-miss incidents and concerns, offer advice on Health and Safety concerns, and further review improvement actions are implemented as required.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	26 October 2021	Initial Certification Audit – Full Certification
1	22 June 2022	Revised to transfer certification from Ulsan Aluminum Limited to Joint Venture partners Novelis and Kobelco due to change with ASI membership.
2	9 May 2023	Surveillance Audit
3	18 November 2024	Re-Certification & Scope Change Audit (PS V2 to PS V3)