

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# UC Rusal

CERTIFICATE NUMBER

34

ASI STANDARD

**PERFORMANCE  
STANDARD  
(V3.1 2023)**

CERTIFICATION LEVEL

**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM

**BUREAU VERITAS  
CERTIFICATION**

DATE OF ISSUE

**20 DECEMBER 2023**

DATE OF EXPIRY

**19 DECEMBER 2026**

CERTIFIED SINCE

**20 JUNE 2019**

## AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by a long horizontal line.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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

Headquarters (Moscow, Russia) manages the following facilities: JSC Bauxite Timana (Bauxite mining, Russia); JSC United Company RUSAL Ural Aluminum Smelter, Kamensk-Uralsky Branch of RUSAL Ural (UAZ) (Alumina refining, Russia); Affiliate of PJSC "RUSAL Bratsk" in Shelekhov (IrkAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); JSC RUSAL Sayanogorsk (SAZ) (Aluminium smelting and casthouse which consists of two production units SAZ and KhAZ, Russia); Kubikenborg Aluminium AB (KUBAL) (Aluminium smelting, casthouse, Sweden); JSC Boguchany Aluminium Smelter (BoAZ) (Aluminium smelting, casthouse, Russia); JSC RUSAL Krasnoyarsk (KrAZ) (Aluminium smelting and casthouse which consists of three production units KrAZ-1, KrAZ-2, KrAZ-3, Russia); PJSC RUSAL Bratsk (BrAZ) (Aluminium smelting and casthouse which consists of three production units BrAZ-1, BrAZ-2, BrAZ-3 and semi-fabrication, Russia); Aughinish Alumina (AAL) (Alumina refining, Ireland); United Company RUSAL Kandalaksha Aluminium Smelter (KAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); JSC RUSAL Sayanal (Semi-fabrication, Russia); CJSC RUSAL Armenal (Semi-fabrication, Armenia); JSC RUSAL Novokuznetsk (NkAZ) (Aluminium smelting, casthouse, Russia); United Company RUSAL Volgograd Aluminium Smelter (VgAZ) (Aluminium smelting, casthouse, Russia); LLC RUSAL Taishet (TaAZ) (Aluminium smelting, casthouse, Russia); Aluminium Rheinfelden Alloys (casthouse, Germany); Rheinfelden Semis (semi-fabrication, Germany).

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	UC Rusal
ENTITY NAME	UC Rusal
CERTIFICATION SCOPE	<p>Headquarters (Moscow, Russia) manages the following facilities: JSC Bauxite Timana (Bauxite mining, Russia); JSC United Company RUSAL Ural Aluminum Smelter, Kamensk-Uralsky Branch of RUSAL Ural (UAZ) (Alumina refining, Russia); Affiliate of PJSC "RUSAL Bratsk" in Shelekhov (IrkAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); JSC RUSAL Sayanogorsk (SAZ) (Aluminium smelting and casthouse which consists of two production units SAZ and KhAZ, Russia); Kubikenborg Aluminium AB (KUBAL) (Aluminium smelting, casthouse, Sweden); JSC Boguchany Aluminium Smelter (BoAZ) (Aluminium smelting, casthouse, Russia); JSC RUSAL Krasnoyarsk (KrAZ) (Aluminium smelting and casthouse which consists of three production units KrAZ-1, KrAZ-2, KrAZ-3, Russia); PJSC RUSAL Bratsk (BrAZ) (Aluminium smelting and casthouse which consists of three production units BrAZ-1, BrAZ-2, BrAZ-3 and semi-fabrication, Russia); Aughinish Alumina (AAL) (Alumina refining, Ireland); United Company RUSAL Kandalaksha Aluminium Smelter (KAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); JSC RUSAL Sayanal (Semi-fabrication, Russia); CJSC RUSAL Armenal (Semi-fabrication, Armenia); JSC RUSAL Novokuznetsk (NkAZ) (Aluminium smelting, casthouse, Russia); United Company RUSAL Volgograd Aluminium Smelter (VgAZ) (Aluminium smelting, casthouse, Russia); LLC RUSAL Taishet (TaAZ) (Aluminium smelting, casthouse, Russia); Aluminium Rheinfelden Alloys (casthouse, Germany); Rheinfelden Semis (semi-fabrication, Germany).</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li><li>• Semi-Fabrication</li></ul>
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (20 February – 28 March 2019)</li><li>• Scope Change Audit (desktop: 20 April – 15 July 2020; on-site: 21 September – 1 October 2020)</li><li>• Surveillance Audit (desktop: 14 – 23 April 2021; on-site: 20 May 2021)</li><li>• Scope Change Audit (on-site: 26 October – 19 November 2021; desktop: 29 November – 1 December 2021)</li><li>• Re-Certification and Scope Change Audit (24 March – 26 May 2022)</li><li>• Re-Certification and Scope Change Audit (8 August – 24 November 2023)</li><li>• Surveillance Audit (7 April – 27 June 2025)</li></ul>
AUDIT FIRM	Bureau Veritas Certification

AUDIT DATE	<ul style="list-style-type: none"> <li>• 20 February – 28 March 2019 (Initial Certification Audit)</li> <li>• Desktop: 20 April – 15 July 2020; on-site: 21 September – 1 October 2020 (Scope Change Audit)</li> <li>• Desktop: 14 – 23 April 2021; on-site: 20 May 2021 (Surveillance Audit)</li> <li>• On-site: 26 October – 19 November 2021; Desktop: 29 November – 1 December 2021 (Scope Change Audit)</li> <li>• 24 March – 26 May 2022 (Re-Certification and Scope Change Audit)</li> <li>• 8 August – 24 November 2023 (Re-Certification and Scope Change Audit)</li> <li>• 7 April – 27 June 2025 (Surveillance Audit)</li> </ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"> <li>• 21 May 2019 (Certification Audit)</li> <li>• 11 November 2020 (Scope Change Audit)</li> <li>• 8 June 2021 (Surveillance Audit)</li> <li>• 15 December 2021 (Scope Change Audit)</li> <li>• 11 June 2022 (Re-Certification and Scope Change Audit)</li> <li>• 1 December 2023 (Re-Certification t and Scope Change Audit)</li> <li>• 19 July 2025 (Surveillance Audit)</li> </ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (20 February – 28 March 2019)</u></p> <p>The Audit Scope included UC Rusal Headquarters (Moscow, Russia) and the following facilities: JSC Timana (Bauxite mining, Russia); RUSAL Kamensk-Uralskiy (Alumina refining, Russia); Branch of PJSC RUSAL Bratsk in Shelekhov (Aluminium smelting, casthouse, semi-fabrication, Russia).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"> <li>• Bauxite Mining</li> <li>• Alumina Refining</li> <li>• Aluminium Smelting</li> <li>• Casthouses</li> <li>• Semi-Fabrication</li> </ul> <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Scope Change Audit (desktop: 20 April – 15 July 2020; on-site 21 September – 1 October 2020)</u></p> <p>The Audit Scope included PJSC RUSAL Bratsk (Aluminium smelting, casthouse and semi-fabrication, Russia), JSC Boguchansk Aluminium Smelter (Aluminium smelting, casthouse, Russia), JSC RUSAL Krasnoyarsk (Aluminium smelting, casthouse, Russia), JSC RUSAL Sayanogorsk (Aluminium smelting, casthouse, Russia) and Kubikenborg Aluminium AB (Aluminium smelting, casthouse, Sweden).</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>Due to COVID-19 related travel restrictions and in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), the scope change audits included two stages: 1. A desktop exercise, including a remote review of relevant documentation and, 2. On-site Audits.</p> <p><u>Surveillance Audit (desktop: 14 – 23 April 2021; on-site: 20 May 2021)</u></p> <p>Included UC Rusal Headquarters (Moscow, Russia) and the following facilities: JSC Timana (Bauxite mining, Russia); RUSAL Kamensk-Uralskiy (Alumina refining, Russia); Branch of PJSC RUSAL Bratsk in Shelekhov (Aluminium smelting, casthouse, semi-fabrication, Russia).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"> <li>• Bauxite Mining</li> </ul>

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- Alumina Refining
  - Aluminium Smelting
  - Casthouses

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

At the time of the Audit (April – May 2021), access to all the sites was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a combined ‘desktop’ and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and an on-site audit at UC Rusal Headquarters.

Scope Change Audit (on-site: 26 October – 19 November 2021; desktop 29 November – 1 December 2021)

The Audit Scope included Aughinish Alumina (AAL) (Alumina refining, Ireland); RUSAL Kandalaksha (KAZ) (Aluminium smelting, casthouse and semi-fabrication, Russia); Sayanal (Semi-fabrication, Russia); Armenal (Semi-fabrication, Armenia).

Supply chain activities included in the Audit Scope:

- Alumina Refining
- Aluminium Smelting
- Casthouses
- Semi-Fabrication

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

At the time of the audit (October – December 2021), access to the Aughinish Alumina (AAL) site was not possible, due to COVID-19 related travel restrictions. The audit of this site has been undertaken as a ‘desktop’ exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation, interviews and site observations using teleconferencing capabilities. It is proposed that the Aughinish Alumina (AAL) site will be audited on site as part of the Re-Certification Audit Scope.

Re-Certification Audit and Scope Change Audit (24 March – 26 May 2022)

The audit scope included UC Rusal Headquarters (Moscow, Russia) and the following facilities: JSC Timana (Moscow, Russia); PJSC RUSAL Bratsk (BrAZ) (Russia); Kubikenborg Aluminium AB (Sweden); Boguchansk Aluminium Smelter (Russia); Aughinish Alumina (Ireland); and Sayanal (Russia).

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

The Audit of the Aughinish Alumina and Kubikenborg Aluminium AB were undertaken as a ‘desktop’ exercise using remote audit techniques, consistent with the ASI multi-site sampling approach.

Re-Certification and Scope Change Audit (8 August – 24 November 2023)

The Audit Scope included the Headquarters (Moscow, Russia), JSC RUSAL Sayanogorsk (SAZ) including the two production units SAZ and KhAZ, Russia, JSC United Company RUSAL Ural Aluminum Smelter, Kamensk-Uralsky Branch of RUSAL Ural (UAZ) (Alumina refining, Russia), C.JSC RUSAL Armenal (Semi-fabrication, Armenia, JSC Bauxite Timana (Bauxite mining, Russia), Aluminium Rheinfelden Alloys (casthouse, Germany), Rheinfelden Semis (semi-fabrication, Germany), United

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Company RUSAL Volgograd Aluminium Smelter (VgAZ) (Aluminium smelting) and LLC RUSAL Taishet (TaAZ) (Aluminium smelting, casthouse, Russia).

The ASI multi-site sampling approach was undertaken on ten out of eighteen facilities included within the Certification Scope.

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All applicable criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (7 April – 27 June 2025)

The Audit Scope included JSC Bauxite Timana (Bauxite mining), JSC United Company RUSAL Ural Aluminium Smelter, Kamensk-Uralsky Branch of RUSAL Ural (UAZ) (Alumina refining), JSC RUSAL Krasnoyarsk (KrAZ) (Aluminium smelting, Casthouse), United Company RUSAL Kandalaksha Aluminium Smelter (KAZ) (Aluminium smelting, Casthouse, Semi-Fabrication), and JSC RUSAL Sayanal (Foil and packaging production).

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All applicable criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li><li><input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the company's defined Certification Scope.</li><li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li></ul>
CERTIFICATION PERIOD	20 December 2023 – 19 December 2026
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	19 December 2026
CERTIFICATE NUMBER	34

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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

The Entity, UC Rusal is one of the leading companies in the global Aluminium industry, considered to be the second largest in the world currently, producing nearly six per cent of the world's Primary Aluminium. It produces metal with a low carbon footprint. Approximately 90 per cent of the Entity's Aluminium is produced from innovative and energy-saving technologies, including renewable electricity. The Entity has demonstrated its ability to reduce greenhouse gas emissions at all production stages and the RUSAL ALLOW brand metal can be viewed as one of 'green' metal. The Entity's Certification Scope currently includes 18 Facilities of all main types of production cycles in the Aluminium supply chain (Bauxite Mining, Alumina production, Aluminium Smelting, re-melting/refining, casting and semi-fabrication). The Entity employs nearly 29,000 personnel across their Certification Scope in Armenia, Germany, Ireland, Russia and Sweden.

## 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	High	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	High	Medium	High	HIGH
OVERALL	MEDIUM			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented and maintained systems to ensure Compliance with Applicable Law. Compliance with Applicable Law is ensured via an electronic legal service which is made available for employees, internal audits, specific training and briefings focused on employees' legal awareness. 'SignAL' hotline is a tool that has been implemented by the Entity to report potential non-compliances identified against Applicable Law: <a href="https://rusal.ru/en/contacts/#signal">https://rusal.ru/en/contacts/#signal</a></p> <p>Legal compliance evaluation is also managed via the Entity's Management Systems, developed in accordance with ISO 14001 and 45001. Certificates of these Management Systems can be viewed at: <a href="https://rusal.ru/en/clients/product-quality">https://rusal.ru/en/clients/product-quality</a></p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established and maintains Anti-Corruption Policies and procedures in all its forms, including Extortion and Bribery. The Entity's Anti-Corruption Policy is accessible at: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct which includes principles that meet the specified level of environmental, social and governance performance. The Code of Conduct is reviewed in accordance with the Entity's internal documentation requirements. The Code of Conduct is publicly accessible in three languages at: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented and maintains up-to-date Policies for environmental, social and governance issues, which are available at: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p> <p>For the implementation of the Policies, Senior Management endorse these Policies and provides the necessary resources and regularly reviews the Policies. Policies are communicated both internally and externally using multiple methods of communication.</p>
2.2a-c Leadership	Conformance	<p>Senior Management Representatives from the Entity have been appointed with the overall responsibility and authority to ensure conformance with the requirements of the ASI Performance Standard and include the relevant Departmental Heads.</p> <p>Appropriate resources needed to establish, implement, maintain and improve the Management Systems have been provided.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity has a formalised, documented and implemented Environmental Management System across their Facilities. The certificates are available at: <a href="https://rusal.ru/en/clients/product-quality">https://rusal.ru/en/clients/product-quality</a></p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has developed and implemented an advanced Responsible Social Management System. The system includes both extended social programs within local areas surrounding the Entity's Facilities and internal programs aimed at improving working and safety</p>



CRITERION	RATING	COMMENT
		<p>conditions. The Management System of social responsibility is described in more detail at:  <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Responsible Sourcing Policy that addresses environmental, social and governance aspects, which is available at:  <a href="https://rusal.ru/upload/Responsible%20Sourcing%20policy.pdf">https://rusal.ru/upload/Responsible%20Sourcing%20policy.pdf</a></p> <p>This Policy is formally reviewed and updated. Results of second party audits of suppliers of goods and services are available. Each contractor or supplier for all Facilities within the Entity must sign a declaration on joining the Business Partner Code of UC RUSAL and the implementation of its requirements. The Entity periodically undertakes audits of suppliers by documenting results in a control card of suppliers covering environmental, social and governance issues.</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for New Projects or Major Changes at existing Facilities. The Entity publicly disclose the summary of findings of the Environmental and Social Impact Assessment as well as the Human Rights Impact Assessment for New Projects at:  <a href="https://rusal.ru/sustainability/environmental-protection/slushaniya">https://rusal.ru/sustainability/environmental-protection/slushaniya</a></p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity conducts Human Rights Impact Assessments, including a gender analysis, for New Projects or Major Changes at existing facilities. For each public hearing, there is a list of Stakeholders who participated in the Consultation process, available at:  <a href="https://rusal.ru/sustainability/environmental-protection/slushaniya">https://rusal.ru/sustainability/environmental-protection/slushaniya</a></p> <p>Moreover, the Entity has established a Public Expert Council that consists of different parties including scientists, public representatives of citizens and authorities where the Entity's Facilities are present. The Council assists in communicating the potential impacts posed by the Entity's Facilities. Further information on this Council is available at:  <a href="https://rusal.ru/sustainability/obshchestvenno-ekspertnyy-sovet-po-ustoychivomu-razvitiyu">https://rusal.ru/sustainability/obshchestvenno-ekspertnyy-sovet-po-ustoychivomu-razvitiyu</a></p> <p>The Entity publicly discloses the Environmental and Social Impact Assessment as well as the Human Rights Impact Assessment at:  <a href="https://rusal.ru/sustainability/environmental-protection/slushaniya">https://rusal.ru/sustainability/environmental-protection/slushaniya</a></p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed Emergency Response Plans for each of its Facilities in accordance with Applicable Law and in collaboration with potentially affected Stakeholder groups. The Entity's Facilities undertake emergency training on a permanent basis in accordance with legal requirements and risk assessments such as hazardous industrial and hydro-technical Facilities.</p> <p>In addition, special exercises are conducted in cooperation with authorised external agencies. The Emergency Response Plans are publicly disclosed through mandatory coordination with local departments of the Ministry of Emergency Situations and of the Federal Service of Environmental, Technological and Nuclear Supervision.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has implemented an ASUR risk Management System for use by employees. This system involves the identification of risks, including</p>

CRITERION	RATING	COMMENT
		risks leading to the suspension of activities. This system is regulated centrally by the Entity's Headquarters. The Business Resilience Plan is developed in the case of risks leading to the suspension or significantly alter operations due to factors outside the Entity's control.
2.9a-b Mergers and Acquisitions	Conformance	Mergers and Acquisitions are undertaken by the Entity in accordance with the Entity's internal procedure to review environmental, social and governance issues in the Due Diligence process. The Due Diligence process considers quantitative and financial data, qualitative indicators, implemented Management Systems, internal processes and procedures, environmental, social and governance practices, including those associated with Historical Aluminium Operations.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed and implemented internal regulations in the case of closure and decommissioning of its Facilities. These regulations presume possible environmental, social and governance consequences. The Entity has demonstrated that it reviews environmental, social and governance issues when planning the closure, decommissioning and divestment of some objects at its sites. In the foreseeable future, the closure, decommissioning and divestment of any facilities are not planned.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The UC RUSAL Sustainability Report is published annually. The reporting boundaries include all production sites of the Entity. The Sustainability Report is a detailed document that provides reliable, verified information, which discloses the governance approach and all Material environmental, social and economic impacts: <a href="https://rusal.ru/sustainability/report/">https://rusal.ru/sustainability/report/</a>
3.2 Non-compliance and Liabilities	Conformance	Information on significant fines, court judgments, and penalties, including non-monetary sanctions for failure to comply with Applicable Laws, may be disclosed as required by law. Any non-monetary penalties imposed by the Local authorities are publicly accessible in accordance with Applicable Law. Information on significant fines, court decisions and penalties are publicly disclosed in the Entity's Sustainability Report and the Annual Report.
3.3a-c Payments to Governments	Conformance	The Entity facilitates or has made on its behalf, payments to governments on a legal and contractual basis. All payments are recorded via several levels of verification in accordance with the procedures and standards of the Entity, including cashless payments to Government authorities. The Entity discloses payments to Governments in the Annual Report, which is accessible at: <a href="https://rusal.ru/en/investors/financial-stat/presentations">https://rusal.ru/en/investors/financial-stat/presentations</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented an effective Complaints Resolution Mechanism for the tracking and management of all Stakeholder (external and internal) complaints, grievances and requests. The 'Signal' hotline is a tool implemented by the Entity to report Stakeholders' complaints, grievances and requests for information: <a href="https://rusal.ru/en/contacts/#signal">https://rusal.ru/en/contacts/#signal</a>

CRITERION	RATING	COMMENT
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has assessed the impact of life cycle changes for the main types of products for which Aluminium is planned to be used or is already being used. The 'cradle to gate' Life Cycle Assessment (LCA) was prepared based on criteria developed by the International Aluminium Institute (IAI). The following types of production were identified in the LCA: Bauxite and nepheline ores, Metallurgical alumina, Anode mass and anodes, Aluminium and, Ingots, tape, wire and granules.
4.1b-c Environmental Life Cycle Assessment – Disclosure	Conformance	Upon customer request, the Entity provides adequate 'cradle-to-gate' LCA information on its Aluminium (containing) Product(s). The Entity demonstrates existing public access to the LCA information and its underlying assumptions including system boundaries. General information about the LCA is disclosed in the Sustainability Report 2023: <a href="https://rusal.ru/en/sustainability/report">https://rusal.ru/en/sustainability/report</a>
4.2 Product Design	Conformance	The Entity's Facilities aim to improve the efficiency of resource use, reduce waste generation, and meet the needs of consumers. For this purpose, manufacturing semi-finished products containing Aluminium (including wire rod and tape) is undertaken in accordance with internal documents regulating the production process of semi-finished products that meet the specified parameters and properties, including requirements regarding the possibility of recycling products, if any. These documents specify clear objectives in the design and development process for products or components to enhance sustainability.
4.3a-b Aluminium Process Scrap	Conformance	The Entity recycles 100% of Aluminium Scrap, including the Scrap from Aluminium alloys generated within its operations. The Entity has implemented an effective system for separating Aluminium alloys and grades and following recycling.
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	The Entity is a member and cooperates with the Russian Aluminum Association, an association of producers, suppliers and consumers of Aluminium and Aluminium-based Products. The Entity is involved in the activity of association intended for improving the system for collecting and recycling Aluminium Products at End of Life.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity publicly discloses information about its Energy use data and Greenhouse Gases (GHG) emissions (Scopes 1, 2, and 3) on an annual basis in its Sustainability Report 2023, pages 50 and 66-70: <a href="https://rusal.ru/en/sustainability/report">https://rusal.ru/en/sustainability/report</a>

CRITERION	RATING	COMMENT
		Calculations of the Entity's GHG emissions and the carbon footprint of Aluminium are verified by independent auditing firms. Information on GHG emissions is also provided via Annual reports to the Carbon Disclosure Project (CDP), the European Union Emission Trading System (EU ETS), and the Monitoring and Reporting Regulation (MMR) – General guidance for installations.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Conformance	All Aluminium Smelting sites of the Entity commenced production before 2020, with only one exception – Taishet Aluminium Plant, which started production in 2021. This new Aluminium Smelting site produces Primary Aluminium using hydropower energy, ensuring a specific level of GHG emissions per tonne of Aluminium well below 11 tCO <sub>2</sub> e/t, which has been confirmed by Third Party verification.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	All Aluminium Smelting sites of the Entity commenced production before 2020, with only one exception – Taishet Aluminium Plant, which started production in 2021. The specific level of GHG emissions per tonne of Aluminium for each of the Aluminium Smelter facilities are well below 11 tCO <sub>2</sub> e/t, which has been confirmed by Third Party verification.
5.3a GHG Emissions Reduction Plans		<p>In accordance with its Environmental Policy, the Entity undertakes an obligation to reduce contaminant emissions into the atmosphere, including GHG emissions. The Entity sets strategic goals to reduce climate impact. The objectives are communicated in the Sustainability Report 2023, pages 66 – 71: <a href="https://rusal.ru/en/sustainability/report/">https://rusal.ru/en/sustainability/report/</a> and in a document entitled 'Pathways for Reduction of Specific GHG Emission from Aluminium and Foil Production at RUSAL's Aluminium Plants in Accordance with ASI Requirements', which is available at: <a href="https://rusal.ru/sustainability/documents/">https://rusal.ru/sustainability/documents/</a></p> <p>The objectives address the most significant sources of GHG emissions: emissions from Aluminium production, Alumina production and indirect emissions associated with the production of electricity purchased from the network by Aluminium smelters.</p> <p>The Entity annually develops plans for reducing GHG emissions in Aluminium and Alumina plants. These plans are annually reviewed and updated if necessary. The Entity annually sets short-term goals on GHG emissions for Aluminium and Alumina Facilities, defining related indicators as goals for achievement. Individual Key Performance Indicators (KPIs) have been established for Alumina and Aluminium production sites on GHG and energy consumption.</p> <p>The Entity's Energy Efficiency Opportunities Road Map identifies a potential list of 26 projects addressing both GHG and energy reduction. The GHG Emissions Reduction Pathway is available in the Sustainability Report 2023 in the sections 'Climate strategy', and 'Pathway to Net Zero 2050'.</p>
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	In accordance with its Environmental Policy, the Entity undertakes an obligation to reduce contaminant emissions into the atmosphere, including GHG emissions. The Entity sets strategic goals to reduce climate impact. The objectives are communicated in the Sustainability Report 2023, pages 66 – 71: <a href="https://rusal.ru/en/sustainability/report/">https://rusal.ru/en/sustainability/report/</a> and in a document entitled 'Pathways for Reduction of Specific GHG Emission from Aluminium and Foil Production at RUSAL's Aluminium

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		<p>Plants in Accordance with ASI Requirements', which is available at: <a href="https://rusal.ru/sustainability/documents/">https://rusal.ru/sustainability/documents/</a></p> <p>The Entity annually develop plans for reducing GHG emissions in Aluminium and Alumina plants, which are annually reviewed and updated as required. The Entity annually sets short-term (intermediate) goals for GHG emissions for Aluminium and Alumina Facilities, defining related indicators as goals for achievement. Individual key performance indicators have been established for Alumina and Aluminium production sites on GHG and energy consumption.</p> <p>The Energy Efficiency Opportunities Road Map identifies a potential 26 projects covering both GHG and energy reduction and is at its initial outset. The GHG Emissions Reduction Pathway is available in the Sustainability Report 2023 in the section 'Climate strategy'.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity demonstrates the implementation of a Management System, evaluation procedures, and operating controls to limit GHG emissions. The GHG emissions calculations are undertaken on an annual basis and verified by independent auditing firms. Information on the Management System is presented in the Sustainability Report 2023, in the section 'Climate Change', pages 42 – 51: <a href="https://rusal.ru/en/sustainability/report">https://rusal.ru/en/sustainability/report</a></p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity quantifies emissions to atmosphere, considering national legal requirements and other commitments as required. Information is disclosed in the Sustainability Report 2023, in the section 'Emissions into Air', pages 35-37: <a href="https://rusal.ru/en/sustainability/report">https://rusal.ru/en/sustainability/report</a></p> <p>All Entity's sites undertake a quantitative assessment of emissions of pollutants into the atmosphere, taking into account national legislative requirements and other commitments, if any.</p> <p>The control of pollutant emissions is carried out in accordance with the applicable legislation and other commitments as required such as the use of certified laboratories. The Entity's Facilities develop and implement measures to reduce emissions of pollutants, monitor their implementation and evaluate their effectiveness.</p> <p>Information on emissions of pollutants into the atmosphere is provided in accordance with legal requirements as well as disclosed in the reporting on the sustainable development of the Entity.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity quantifies Discharges to Water, taking into account national legal requirements and other commitments as required. This information is disclosed in the Sustainability Report 2023, in the section 'Water Resources', page 28: <a href="https://rusal.ru/en/sustainability/report">https://rusal.ru/en/sustainability/report</a></p> <p>The Entity conducts a quantitative assessment of contaminant discharges into water bodies. Calculations are made for each water outlet at the stage of preparation and approval permits for water discharges. Information on wastewater discharges is provided in accordance with legal requirements to Federal Supervision Bodies, as well as disclosed in the reporting on the sustainable development of the Entity. Many sites of the Entity have implemented a closed circuit system of water use.</p>

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6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The assessment of major risk areas of operations with potential Spills and Leakages with potential contamination of air, water and/or soil, are undertaken. The Entity has implemented management plans, compliance controls and a monitoring program to prevent and detect Spills and Leakages. These plans are updated regularly.</p> <p>The Emergency Response Plans (including Spills and Leakages) are publicly disclosed through mandatory coordination with local departments of the Ministry of Emergency Situations and of the Federal Service of Environmental, Technological and Nuclear Supervision.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented procedures for immediate notification by affected parties about the volume, type and potential impact of significant Spills. The Entity publicly discloses Impact Assessments of significant Spills (if any occur) and any remediation actions taken and reports publicly on an annual basis. Refer to the Sustainability Report 2023, in the section 'Emergency response', page 77:  <a href="https://rusal.ru/en/sustainability/report">https://rusal.ru/en/sustainability/report</a></p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has developed and implemented a waste management strategy in accordance with the Environmental Policy, considering national legal requirements and other commitments, as required. The Entity publicly discloses on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated Waste disposal methods in the Sustainability Report, in the section 'Waste Management', page 31: <a href="https://rusal.ru/en/sustainability/report">https://rusal.ru/en/sustainability/report</a></p>
6.6a-g Bauxite Residue	Conformance	<p>Bauxite Residue Storage areas are constructed in a manner that effectively prevents the release of Bauxite Residue and leachate into the environment. The efficiency and safety of Bauxite Residue storage during operation is ensured through maintenance, regular inspections and control checks, and monitoring of the condition of facilities, including those with the involvement of technical specialists.</p> <p>At each Bauxite Residue storage, the water circulation drainage systems (with zero discharge) are implemented and operational. The Entity does not discharge Bauxite Residue to marine and aquatic environments.</p> <p>The Entity has established a program (roadmap) for the prospective development of Bauxite Residue storage facilities or re-use of Bauxite Residue, taking into account the possibility of transition to the best available technologies. In the case of Bauxite Residue area closure planning processes, the Entity monitors its condition and environmental impacts, as well as rehabilitates disturbed areas in accordance with the Applicable Law.</p>
6.7a-f Spent Pot Lining (SPL)	Minor Non-Conformance	<p>The Entity ensures the storage and management of Spent Pot Lining (SPL) in a manner to prevent the release or leachate into the environment. For optimisation processes of recovery and recycling of carbon and refractory of SPL materials and in accordance with the Waste Mitigation Hierarchy, the Entity aims to minimise the volume of SPL generation by increasing the service life of SPL (the period between pot relining). Carbon materials from SPL are transferred to specialised licensed organisations for recycling. Refractory materials from SPL are partially transferred to specialised organisations and are partially landfilled at waste disposal sites.</p>

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		<p>Alternative options for landfilling of treated SPL and/or stockpiling of refractory SPL, are reviewed annually whilst investigating potential consumers. The Entity does not discharge SPL into the marine or aquatic environment.</p> <p>During the Audit, it was observed that at JSC RUSAL Krasnoyarsk (KrAZ) the main amount of SPL is stored in a special hangar (a warehouse for temporary storage of SPL with a roof and a waterproof base). However, a part of the carbon SPL was being stored in an open premises with a damaged roof and walls.</p>
6.8a-d Dross	Conformance	At each of the Entity's facilities, 100 per cent of Dross is transferred to third parties for use and/or recycling. The amount of Dross and Dross residues, which was transferred for use and/or recycling is annually claimed in the State Statistical Form 2-TP (waste, data on formation, treatment, utilisation, neutralisation, transportation and disposal of waste production and consumption) and provided to state environmental protection supervision agencies.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has developed a water balance for its Facilities, which defines its water withdrawal, usage and consumption by source and type. Water-related risks in Watersheds in the Entity's Area of Influence are assessed in the Entity's Risk Management System and Environmental Management System.</p> <p>The Entity's risks are assessed considering two key factors, which characterise the Materiality of the risks, including the likelihood of risk realisation and evaluation of potential loss because of the risk realisation.</p> <p>The Entity's risk assessment process also considers applied control measures when determining the level of significance and Materiality. Based on this approach, there are no Material water-related risks in any Watersheds in the Entity's Area of Influence. Water data are disclosed in the Entity's Sustainability Report, in the section 'Water Resources', page 26: <a href="https://rusal.ru/en/sustainability/report">https://rusal.ru/en/sustainability/report</a></p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the Entity's water balance, Risk Management System and Environmental Management System did not identify any Material water-based risks in the Entity's Area of Influence.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>Each of the Entity's Facilities assesses the risks and Materiality of impacts on Biodiversity and Ecosystem Services resulting from land use and activities within the Entity's Area of Influence. Facilities organise and conduct Biodiversity research activities and Biodiversity monitoring in cooperation with research organisations. The activities revealed no Significant Risks and impacts on Biodiversity and Ecosystem Services in the Entity's Area of Influence. The Entity has established and maintains the Biodiversity Policy and is accessible at: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p> <p>In the case of construction of new Facilities or after substantial changes in existing Facilities. An assessment is conducted during the Environmental Impact Assessment which is a mandatory part of</p>

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		design documentation. For existing Facilities, in accordance with the Entity's Matrix, the Entity's sites annually conduct voluntary investigations in the field of Biodiversity and Ecosystem Services assessment in cooperation with related scientific organisations.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, the risks and potential impacts on Biodiversity and Ecosystem Services are identified, assessed and documented as low. However, the Entity has in place a system for the management of Biodiversity and Ecosystem Services impacts in accordance with the Biodiversity Mitigation Hierarchy to protect ecosystems, habitats and species.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as the risks and potential impacts identified in the Biodiversity and Ecosystem Services Risk and Impact Assessment have been assessed and documented as low. However, the Entity has implemented a system for management of its Biodiversity and Ecosystem Services impacts in accordance with the Biodiversity Mitigation Hierarchy to protect ecosystems, habitats and species.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as the risks and potential impacts identified in the Biodiversity and Ecosystem Services Risk and Impact Assessment have been assessed and documented as low. However, the Entity has implemented a system for management of its Biodiversity and Ecosystem Services impacts in accordance with the Biodiversity Mitigation Hierarchy to protect ecosystems, habitats and species.
8.4 Alien Species	Conformance	<p>To prevent the accidental or deliberate introduction of Alien Species, the Entity has undertaken a risk assessment on Biodiversity and the Material impact. Packaging timber has been identified as the most likely way of introducing Alien Species. To prevent the introduction of Alien Species, all packing wood is controlled and, when required, treated.</p> <p>The Entity has established and maintains the Biodiversity Policy, available at: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	<p>The Entity does not undertake activities, including survey work, in the locations of World Heritage sites. Commitment to "No Go" in World Heritage Properties is included in the Human Rights Policy and Biodiversity Policy, available at: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p>
8.6a-d Protected Areas	Conformance	The Entity has conducted investigations to define Protected Areas within its Area of Influence. However, it has been concluded that there are no Protected Areas in the Entity's Area of Influence. Within the framework of the conducted assessment of risks to Biodiversity, specially protected natural territories within the sphere of influence of the sites have not been identified. According to the results of monitoring, no significant negative impact from the activities of the Entity's sites was found.
8.6e Protected Areas - Bauxite Mining	Conformance	The Entity has conducted investigations to define Protected Areas within its Area of Influence, which includes Bauxite Mining areas. Protected Areas are absent in the Area of Influence. Within the framework of the conducted assessment of risks to Biodiversity,



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		<p>specially protected natural territories within the sphere of influence of sites have not been identified. According to the results of monitoring, no significant negative impact from the activities of the Entity's sites was found.</p>
8.7a-I Mine Rehabilitation	Conformance	<p>Approaches and requirements for the assessment of obligations for the decommissioning of assets and environment rehabilitation are required by the Entity, under the regulation 'Decommissioning of Objects and Environment Restoration: Requirements of Work Organization and Assessment of Obligation'.</p> <p>Mine closure is not planned in the near future, and if and when there is a decision to close a mining operation, the Entity will rehabilitate environments disturbed or occupied by mining activities using the best available techniques.</p> <p>The Entity provides financial provisions to ensure the availability of adequate resources to achieve progressive rehabilitation and mine closure requirements. The latest version of the Mine Rehabilitation and Closure Plan is available upon request. General information on activities in this area is publicly available in the Sustainability Report 2023, in the section 'Land Resources', page 37:  <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p>
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has developed and implemented Policies that reflect commitments to respect Human Rights in accordance with the UN Guiding Principles on Business and Human Rights:  <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p> <p>The Human Rights Due Diligence process addresses actual and potential impacts on the rights including a Human Rights Impact Assessment that considers complaints, grievances and requests received via the Complaints Resolution Mechanism. The Entity has a process in place to address identified Human Rights-related inconsistencies. The Entity has implemented processes for remediation of adverse Human Rights impacts as required:  <a href="https://rusal.ru/en/contacts/#signal">https://rusal.ru/en/contacts/#signal</a></p> <p>No adverse Human Rights related risks were identified for any of the Entity's sites. As part of the preparation of Environmental reporting, each of the Entity's sites can register complaints and requests on environmental issues which can have the potential to lead to Human Rights violations.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has developed and implemented a Human Rights Policy based on the recommendations of International Standards, including the Committee on the Elimination of Discrimination against Women (CEDAW), which is available at:  <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p> <p>The Entity's Remuneration system ensures the right of employees to fair Remuneration, as well as the right to equal pay for equal work, while taking into consideration the specific regional context. The Remuneration system also ensures equal Remuneration for men and women for work of equal value, considering their experience and skills. The rights and interests of women are protected by the Labour Code of the Russian Federation (section 41) including the prohibition of any form of Discrimination (section 3). At foreign Entity's sites, the Russian</p>

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		Federation Labor Code requirements supplement local legislation, if required.
9.3a-I Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there were no Indigenous Peoples, or their lands identified. The process of identifying and mapping of Indigenous Peoples is integrated in internal documents. The Entity's activities do not affect the interests of Indigenous Peoples and their livelihoods. However, if actual or potential adverse impacts were to arise from the Entity's activities, the Entity has a process for addressing these adverse impacts on the Indigenous Peoples and their lands.
9.4a Free, Prior, and Informed Consent (FPIC)-- New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have been initiated since becoming an ASI member, and secondly, no Indigenous Peoples or their lands have been identified in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC)-- Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have been initiated relating to Bauxite Mining since becoming an ASI member, and secondly, no Indigenous Peoples or their lands have been identified in the Entity's Area of Influence.
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 identified in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage-- Identification	Conformance	A review of available information supports the absence of cultural and sacred heritage sites in the Areas of Influence of the Entity. However, in accordance with the Entity's Human Rights Policy, in the case of identification such as places within the Entity's Area of Influence, the Entity takes appropriate actions to avoid or remedy impacts in Consultation with and, where possible, with the participation of Affected Populations and Organisations. <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a>
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	The Criterion is not applicable to the Entity, as the identification exercise confirmed the absence of cultural and sacred heritage sites within the Areas of Influence of the Entity.
9.6a-i Displacement	Not Applicable	The Criterion is not applicable to the Entity as there have been no resettlements related to the Entity's Certification Scope since it has become an ASI Member and there are no planned relocations or resettlements for the foreseeable future.  However, the Entity does consider the issues of resettlements in accordance with Applicable Law. Any project design documentation is to include the Environmental and Social Impact Assessments and an analysis of feasible alternatives to avoid or minimise physical and/or economic displacement.
9.7a-h Affected Populations and Organisations	Conformance	In accordance with the Entity's Human Rights Policy, the Entity recognises the impact on Affected Populations and Organisations in the regions and countries of its operation: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a>  The Entity's Human Rights Due Diligence assessment did not identify any issues or activities that could affect communities and other

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		organisations. The Entity has implemented a process for engaging with Affected Populations and Organisations and exploring opportunities to support their interests even if no adverse impact has been identified.
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	<p>The Entity does not contribute to nor promote armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity also does not allow or facilitate the extraction, supply or use of minerals from conflict areas where the proceeds may be used to finance Violence in countries where such minerals are extracted. The Entity's current Declaration of Conflict Minerals Free Manufacturer is available at:  <a href="https://rusal.ru/upload/iblock/2e2/2e21dc1128f1486eb50624e660d96f23.pdf">https://rusal.ru/upload/iblock/2e2/2e21dc1128f1486eb50624e660d96f23.pdf</a></p> <p>An effective Management System was implemented based on the mentioned above Policies (including the Entity's Responsible Sourcing Policy and Compliance Policy) with appropriate responsibilities and resources, information gathering and supplier engagement. The Compliance Management System has been certified under the requirements of ISO 37301:2021 standard which addresses sanctions regulations and anti-Corruption.</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>Supply chain risks are determined by the Entity for every specific case based on the implementation of compliance accreditation. The system allows a change to the lists of countries and territories depending on changing conditions and legislative acts in reviewed countries (i.e. databases or lists of the Russian Federation, UN, EU and USA).</p> <p>A risk assessment is undertaken in accordance with the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance) considering anti-Corruption, control of transactions, counterparties and tenders.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>As part of the Human Rights risk assessment, the Entity's tool in Excel format, supports the Entity's Facilities to periodically undertake a risk assessment regarding Conflict Areas and High-Risk Areas. Bauxite contracts are controlled by RUSAL RAAL who source Bauxite from Guinea and Brazil. The strategy to respond to risks is provided in the 'Regulations on Functioning of Company Compliance System' document and extended in the Sanctions Policy and Anti-Corruption and Anti-Bribery Policy: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>The Entity has established a special directorate for control, internal audit and business coordination. In addition, the Entity's Compliance Directorate itself monitors all local compliance officers and keeps statistics and records of detected inconsistencies in the compliance process. The Entity's system of Due Diligence is undertaken annually. The Entity's Compliance Management System is certified under ISO 37301:2021 which also facilitates annual internal and external audits of the Due Diligence system. This ASI Audit also satisfies this Criterion requirement.</p>
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity reports on Due Diligence directly to the Board of Directors quarterly and then annually aggregated. Annual reporting on supply chain Due Diligence is provided in the annual Sustainability Reports: <a href="https://rusal.ru/en/sustainability/report">https://rusal.ru/en/sustainability/report</a></p>

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9.9 Security practice	Conformance	The Entity ensures respect for Human Rights when engaging with private or public security services. All employees of security contractors at the Entity's sites undergo mandatory training in accordance with the Entity's approved rules for access to sites and on-site security procedures, as well as periodic briefings. The Entity's Human Rights Policy ensures that the safety and security of the employees and contractors is provided in compliance with the rights, freedoms and personal safety of all persons (see cl.5.1 of the Human Rights Policy).
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>A Mining and Metallurgical Trade Union is present at the Entity's sites. Approximately 60% of employees of the Entity are involved in the Trade Union. All important issues in areas of social relations, Human Rights, and occupational safety are resolved by the management of the Entity in cooperation with the leaders of the Trade Union. The Entity provides Freedom of Association via the right to Collective Bargaining. The Entity's Human Rights Policy is accessible on the website: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p> <p>In accordance with applicable legislation which is in compliance with the ILO Conventions C87 and C98, employees have the right to form and join Trade Unions. Representatives of Trade Unions maintain compliance with applicable legislation, including such issues as working hours and rest periods, occupational safety of employees, Remuneration, social guarantees and benefits. Participation in the Collective Bargaining process is conducted in good faith and with adherence to Collective Bargaining Agreements.</p>
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as Freedom of Association and the Right to Collective Bargaining are permitted in the countries where the Entity's sites operate.
10.2a-c Child Labour	Conformance	In accordance with the Entity's Policy Human Rights Policy, Child Labour is prohibited not only in its sites but also within its business partners' operations. All conducted interviews during the audit confirmed that Child Labour in any form is not used or supported by the Entity.
10.3a-c Forced Labour	Conformance	<p>The Entity does not participate in any form of Forced Labour use. In accordance with the Entity's Statement on the Prevention of Labour Practices Qualifying as 'Modern Slavery', Human Rights Policy and Code of Corporate Ethics, the Entity is not involved in Forced Labour for any of its associated activities.</p> <p>The Entity does not support Human Trafficking and does not require bond payments or other forms of payments from employees for acceptance of work or advance payment for equipment. A Statement on the Prevention of Labour Practices Qualifying as 'Modern Slavery' is available at: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p>
10.4a-c Non-Discrimination	Conformance	In accordance with the Entity's Statement on the Prevention of Labour Practices Qualifying as 'Modern Slavery', Human Rights Policy and the Code of Corporate Ethics, any Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any

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		Worker on any grounds, is prohibited. These documents are available at: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a>
10.5 Communication and engagement	Conformance	<p>The Entity's Management Systems ensure open communication and direct interaction with Workers and their representatives, regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment. Communication and direct engagement with Workers and their representatives regarding working conditions and issues related to the workplace and compensation is undertaken through communications through the line Manager; the HR Director, the Hotline (Signal), the Ethics officers, appeals through Trade Union organisations and with Health and Safety representatives.</p> <p>The Entity does not apply any measures of Harassment or other reprisals on employees who have used the complaints and appeals mechanisms.</p>
10.6a-g Violence and Harassment	Conformance	<p>There are no cases of corporal punishment use, mental or physical coercion, Harassment, or gender-based Violence, including sexual Harassment, or verbal abuse of Workers have been identified or reported at the Entity's sites.</p> <p>In accordance with the Entity's Human Rights Policy, it is prohibited to use any corporal punishment, mental or physical coercion, Harassment and gender-based Violence, including sexual Harassment, or verbal abuse. This prohibition applies also to disciplinary measures. The Human Rights Policy is available at: <a href="https://rusal.ru/en/sustainability/approaches">https://rusal.ru/en/sustainability/approaches</a></p>
10.7a-d Remuneration	Conformance	<p>Remuneration provided by the Entity is considered one of the highest across the industry and meets legal and industry standards, the basic needs of employees, and provides some discretionary income. Wage payments are undertaken in a timely manner, in legal tender and are fully documented.</p> <p>In accordance with applicable legislation, Remuneration is paid at least twice a month. The procedure for Remuneration is regulated in the 'Standard Regulations on Remuneration and Bonuses of Employees of RUSAL's Enterprises Located in Russian Federation Territory'.</p> <p>Remuneration is also addressed in the Collective Bargaining Agreements between Workers, Trade Unions and employers' representatives.</p>
10.8a-c Working Time	Conformance	<p>Working Time including Overtime, public holidays and paid annual leave are in compliance with applicable local law and industry standards.</p> <p>In accordance with the Entity's Human Rights Policy, the Entity complies with national and international law and industry standards regarding working hours, holidays and payments for annual leave. The Personnel Directorate develops a standard employment contract, which contains a section on 'working and rest hours' in accordance with applicable legislation. Leave is granted in accordance with the vacation schedule approved by the Employer with consideration from the Trade Union organisation, as required.</p>

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		The Entity's Human Resources Directorate conducts internal audits to ensure that leave is granted on time and that the holiday schedule is observed.
10.9a-b Informing Workers of Rights	Conformance	The Entity provides employees with information on their rights through an internal portal. Each employee has a personal account where they can access information about their salary, vacations and social benefits. The Entity has implemented a team of Corporate Ethics Officers who inform Workers of their Rights and resolve issues or disputes.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented and documented an Occupational Health and Safety (OH&S) Management System that is in conformance with applicable national and international Standards. The OH&S Management System uses the risk-oriented approach to eliminate or minimise OH&S risks.
11.1b-e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure	Conformance	<p>In accordance with the Entity's Occupational Safety Policy, the implemented OH&amp;S Management System is reviewed annually or in case of any changes to the Business that alter Material OH&amp;S risk(s) and on any indication of a control gap. Information on the Management System's effectiveness is publicly disclosed annually in the Sustainability Report and includes leading and lagging indicators and comparative analyses of performance with peer Businesses and leading practices: <a href="https://rusal.ru/en/sustainability/report">https://rusal.ru/en/sustainability/report</a></p> <p>As part of the Entity's OH&amp;S safety report, the Entity's Disability Injury Frequency Rate is compared with national and international statistics. The average injury rates within the Aluminium industry are compared and the trend is analysed in comparison with the Aluminium industry in general.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity provides Workers with a range of mechanisms to engage in health and safety, such as Joint Health and Safety Committees, Labour Dispute Commissions, Working Councils, and the First Stage of Control System by which they can raise, discuss, and participate in the resolution of OH&S issues with management.

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## DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	20 June 2019	Initial Certification Audit – Full Certification
1	7 November 2019	Updated to comments in Criteria 7.1b, 7.2a and 7.2b
2	8 December 2020	Updated to reflect Certification Scope Change with addition of PJSC RUSAL Bratsk, JSC Boguchansk Aluminium Smelter, JSC RUSAL Krasnoyarsk, JSC RUSAL Sayanogorsk and Kubikenborg Aluminium AB.
3	15 July 2021	Surveillance Audit
4	17 January 2022	Scope Change Audit – Certification Scope updated to include sites Aughinish Alumina (AAL), RUSAL Kandalaksha (KAZ), Sayanal and Armenal.
5	4 July 2022	Re-Certification Audit and Scope Change – Full Certification. Scope Change to include the supply chain activity of ‘Aluminium Re-melting/Refining’.
6	28 February 2023	Text amendment – Corrected the Audit Scope for the Re-Certification Audit and Scope Change to include PJSC RUSAL Bratsk (BrAZ).
7	20 December 2023	Re-Certification and Scope Change Audit from Performance Standard V2 to V3. Change of Accredited Auditing Firm from DNV Business Assurance Services UK Ltd. to Bureau Veritas Certification. Certification Scope updated to include sites at: Aluminium Rheinfelden Alloys, Rheinfelden Semis, RUSAL Novokuznetsk, RUSAL Taishet and RUSAL Volgograd.
8	8 August 2025	Surveillance Audit