ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Ulsan Aluminum Ltd

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
159	**PERFORMANCE STANDARD (V3.1 2023)**	**FULL CERTIFICATION**	**DNV BUSINESS ASSURANCE SERVICES UK LTD.**
	DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE
	26 OCTOBER 2024	**25 OCTOBER 2027**	**26 OCTOBER 2021**

AUTHORISED BY

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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	• Aluminium Re-melting/Refining • Casthouses • Material Conversion
ASI STANDARD	• Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (13 – 17 September 2021) • Surveillance Audit (3 – 5 April 2023) • Re-Certification Audit and Scope Change (23 – 27 September 2024) • Surveillance Audit (19 – 22 May 2026)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	• 13 – 17 September 2021 (Initial Certification Audit) • 3 – 5 April 2023 (Surveillance Audit) • 23 – 27 September 2024 (Re-Certification Audit and Scope Change) • 19 – 22 May 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 30 September 2021 (Initial Certification Audit) • 19 April 2023 (Surveillance Audit) • 16 October 2024 (Re-Certification Audit and Scope Change) • 10 June 2026 (Surveillance Audit)
AUDIT SCOPE	Initial Certification Audit (13 – 17 September 2021) 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.

	Surveillance Audit (3 – 5 April 2023) 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. 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. Surveillance Audit (19 – 22 May 2026) 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	Re-Certification Audit
NEXT AUDIT DATE	25 October 2027
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. The Entity currently produces approximately 285,000 tonnes of Aluminium flat-rolled Products.

The Entity covers approximately 37 hectares and currently has 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 in the development of 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. Legal compliance registers of Human Rights, labour, ethics, environment, and Health and Safety have been established to identify and maintain relevant legal requirements. Compliance audits are conducted annually, and audit results are reviewed and reported during annual management review.
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 these Policies is provided to employees and Workers, and suppliers (internal Contractors and external suppliers) are required to sign and acknowledge the Supplier Code of Conduct. The Entity's Anti-Corruption Policy, Code of Conduct, Supplier Code of Conduct, Anti-Trust Policy are all available 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 set out its commitments and principles related to Environmental, Social, and Governance (ESG). Both documents include provisions for periodic review. The Entity provides Workers with training on the Code of Conduct, available at: 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, which are reviewed periodically. Senior management has endorsed and supported these Policies by providing sufficient resources to ensure their regular review and consistency with ESG practices.
2.2a-c Leadership	Conformance	The Entity has appointed Senior Management Representatives with defined responsibilities to ensure Conformance with the ASI Performance Standard and the effective communication of relevant Environmental, Social, and Governance (ESG) Policies internally and externally. The Entity has identified and allocated the resources necessary to establish, implement, maintain, and continually 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, available at: https://ulsanaluminum.com/home/vision/vision02.jsp
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established and maintained a Social Management System Manual and an Occupational Health and Safety (OH&S) Management System certified to ISO 45001. The Entity's ISO 45001 Certificate, Health and Safety Policy, and related activities are available at: https://ulsanaluminum.com/home/vision/vision02.jsp

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented Policies and processes, which are reviewed periodically, to address and manage its responsible sourcing requirements. The Entity has identified its major next-tier suppliers and conducts Due Diligence audits (online or onsite), with follow-up improvement actions implemented as required. Major suppliers are required to comply with the Entity's Supplier Code of Conduct, available at: https://ulsanaluminum.com/home/vision/vision03.jsp
2.5a-g Environmental and Social Impact Assessments	Not Applicable	The Criterion is not applicable to the Entity as the it currently has no New Projects or no Major Changes planned for existing Facilities. The Entity has however developed a procedure to implement and periodically review environmental and social impacts for New Projects or Major Changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable the Entity as it currently has no New Projects or Major Changes planned for existing Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity has established and maintained Emergency Response Plans in collaboration with potentially affected Stakeholder groups, including communities and government authorities. Workers, including in-house subcontractors, receive relevant emergency response training, and emergency drills are conducted periodically. The current Emergency Response Plans (Crisis Response) have been disclosed in the Entity's Sustainability Report (Contingency Plan, page 17–19), available at: https://ulsanaluminum.com/home/vision/vision01.jsp The Emergency Response Plans are also available in the Crisis Communication Resource Book, available at: https://ulsanaluminum.com/home/intro/intro04.jsp?bdMode=view&dataId=BDATA000000010000054&retUrl=&pageIndex=1&searchCondition=&searchKeyword=&searchCategory=
2.8a-d Suspended Operations	Conformance	The Entity's ASI Performance Standard Manual and Emergency Response Procedure indicate that Business recovery and continuity programmes have been established to prevent situations that may lead to the suspension or significant alteration of operations. Both the Emergency Response Plan and Business continuity programmes are reviewed periodically.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a documented management procedure for mergers and acquisitions requirements. No such activities have occurred or are planned since the Entity joined ASI.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has no currently planned closure, decommissioning, or divestment activities. Should any such event occur, the Entity will conduct a formal review of the Environmental, Social, and Governance (ESG) impacts associated with closure, decommissioning, or divestment activities and consult, where practicable, with Affected Populations and Organisations.
3.1a-b Sustainability Reporting	Conformance	Based on the Global Reporting Initiative (GRI) Standards, an Annual Sustainability Report is prepared by Novelis Global and verified by an independent third-party verification body has been issued and

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		included the Entity's Sustainability Data, available at: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf Additional disclosure information from the Entity's Sustainability Report, which is not included in the Annual Sustainability Report, is available at: https://ulsanaluminum.com/home/vision/vision01.jsp Key performance indicators, Material ESG topics, economic impacts, and related activities have been disclosed in the reports, including performance results, interactions with the Local Communities, and legal and ASI Standard compliance information.
3.2 Non-Compliance and Liabilities	Conformance	The Entity has disclosed information on significant fines, judgments, penalties, and non-monetary sanctions arising from non-compliance with Applicable Law and regulations. No fines issued by relevant government agencies have been reported in the Sustainability Report (Other Environmental Information, page 28; Health and Safety Targets and Performance, page 29; Compliance and Human Rights, page 44), available at: https://ulsanaluminum.com/home/vision/vision01.jsp
3.3a-c Payments to Governments	Conformance	The Entity's Financial Report, including its financial information and verification statement issued by a third-party accounting firm, is available at: http://dart.fss.or.kr Certificates confirming full national and local tax payments to governments have been issued and verified. The summary statement of payments to governments, along with information on the direct or indirect value and beneficiaries of financial and in-kind political contributions, has been disclosed in the Entity's Sustainability Report (Compliance and Human Rights, page 44; Social Responsibility, page 45), available at: https://ulsanaluminum.com/home/vision/vision01.jsp
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has established internal and external complaint and grievance reporting mechanisms (e.g., hotlines, grievance handling councils, website channels, and anonymous grievance boxes installed at the Entity). Relevant information is available at: https://ulsanaluminum.com/home/vision/vision06.jsp and in its Sustainability Report (Ethics Hotline, page 16; Contact, page 46) available at: https://ulsanaluminum.com/home/vision/vision01.jsp A register of reported grievance and whistleblowing cases is maintained.
4. Material Stewardship		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a 'cradle-to-grave' Life Cycle Assessment (LCA) based on the ISO 14040:2006 Standard. The LCA was completed by an independent third party and covers the Entity's final Products, including industrial Products, automotive Products, and cans.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The LCA report can be provided upon request; however, no requests for LCA data have been received to date. The Entity's LCA report has been developed in Korean, and a summary version is available at: https://ulsanaluminum.com/home/vision/vision01.jsp
4.2 Product Design	Conformance	The Entity does not directly design its Products. Relevant objectives and activities to enhance Circular Economy outcomes during the design and development phase of the production process have

CRITERION	RATING	COMMENT
		however been established and are managed in accordance with the Entity's ASI Performance Standard Manual and Objective and Programme Management Procedure.
4.3a-b Aluminium Process Scrap	Conformance	All (100%) of the Entity’s Aluminium Process Scrap is collected and reused, as detailed in the Entity’s Scrap Collection Standard and Sustainability Report. Process Scrap generated from production Facilities is collected and reused within the Entity. The Entity has established a 100% Scrap collection, recycling, and reuse target and separates Aluminium alloys in accordance with 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	The Entity has established a recycling strategy and annual targets to increase the use of Recycled Scrap materials in production, as stated in the Entity’s Recycling Strategy Plan, available at: https://www.novelis.com/novelis-3x30/ The Entity has established recycling targets for Scrap materials used in its production, which are monitored periodically. The detailed project strategy has been disclosed in the Sustainability Report (Global Progress Dashboard, page 16; Lever 2: Maximising Circularity, page 25–35), available at: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf
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. The Entity's recycling strategy is available at: https://www.novelis.com/novelis-3x30/ The Entity has established recycling systems to increase the use of Scrap materials by expanding its recycling capabilities and engaging with Scrap suppliers. The Entity has established and maintained recycling plans to increase recycling content rates and implement accurate measurement of recycling rates in production. Efforts to communicate the economic, environmental, and social benefits of Aluminium collection have been disclosed in the Entity's Sustainability Report (page 10–13), available at: https://novelis.com/wp-content/uploads/2026/06/Novelis_Sustainability_2025_V26_compressed.pdf
5. GHG Emissions		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity participates in the Government-regulated Greenhouse Gas (GHG) Emissions Trading Scheme. Direct and indirect GHG emissions and energy use by source are tracked, calculated, and documented. As legally required, 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: Gas and Scope 2: Electricity) have been disclosed in the Entity’s Sustainability Report (Greenhouse Gas, p. 23), available at: https://ulsanaluminum.com/home/vision/vision01.jsp Scope 1, Scope 2, and Scope 3 GHG emissions have been disclosed at a Corporate-wide level in the Sustainability Report (CO_2e Emissions, page 18) and verified by an external verification firm. The Report is available at: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf

CRITERION	RATING	COMMENT
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity's decarbonization strategy aligned with a 1.5°C warming scenario (Net Zero by 2050), is available at: https://www.novelis.com/novelis-3x30/ Greenhouse Gas (GHG) Emissions Reduction Plans and Pathways have been established and are managed. The Entity's GHG Emissions Reduction Plans and Pathways, including its Net Zero Policy by 2050, have been disclosed in the Entity's Sustainability Report (Greenhouse Gas, page 23), available at: https://ulsanaluminum.com/home/vision/vision01.jsp The Entity's progress against the reduction plans has also been disclosed in the Corporate Sustainability Report (Progress toward Goals, Page 15-18), available at: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	The Entity has established a programme to monitor, control, and review its GHG emissions against its GHG emissions reduction goals, plans, and pathways. The Entity's GHG Emissions Reduction Plans and progress have been disclosed in the Entity's Sustainability Report (Greenhouse Gas, page 23), available at: https://ulsanaluminum.com/home/vision/vision01.jsp The Entity's progress against the reduction plans has also been disclosed in the Corporate Sustainability Report (Progress toward Goals, Page 15-18), available at: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf GHG Emissions Reduction Pathways compliance with the ASI Performance Standard have been established and disclosed in the ASI Decarbonisation Pathway, available at: https://novelis.com/wp-content/uploads/2026/03/ASI-Decarbonization-Pathway.pdf
5.4 GHG Emissions Management	Conformance	The Entity has developed and maintained a GHG Management Procedure addressing GHG emissions and energy use, operational controls, monthly monitoring, internal compliance audits, and management review. Periodic internal audits and management reviews of the Entity's GHG Management System, performance, and progress are conducted, and improvement actions are implemented where applicable.
6. Emissions, Effluents and Waste		
6.1a-f Emissions to Air	Conformance	The Entity's Environmental Impact Assessment has identified and quantified air emission pollutants. The remelting process is a major source of fugitive dust, and scrubbers are used to mitigate air

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		pollutant emissions. Qualified personnel monitor and record the daily operation of air emission control Facilities. Air emission reduction plans are reviewed annually. Air emissions have not exceeded the applicable legal limits since 2001. Annual air emissions targets, pollutant emission volumes, and management plans have been disclosed in the Entity's Sustainability Report (Air Pollutants Management, page 25), available at: https://www.env-info.kr and https://ulsanaluminum.com/home/vision/vision01.jsp
6.2a-g Discharges to Water	Conformance	The Entity operates on-site wastewater treatment Facilities and has established water reduction targets and plans, which are reviewed periodically to minimise adverse environmental impacts. Since 2001, there have been no reported cases of wastewater discharges exceeding legal limits or environmental incidents related to water discharge. The Entity's water discharge targets, performance, and latest management plans have been disclosed in the Entity's Sustainability Report (Water Management, page 24), available at: https://ulsanaluminum.com/home/vision/vision01.jsp
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted an Environmental Impact Assessment and an Off-Site Risk Assessment to identify the potential for Spills and Leakages that may contaminate air, water, and soil. The findings of this assessment indicate that the Entity has established control plans, which are reviewed periodically to prevent Spills and Leakages. The Entity's control plans have been disclosed in the Entity's Sustainability Report (Leakage Management, page 26), available at: https://ulsanaluminum.com/home/vision/vision01.jsp
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity's Emergency Response Procedure includes requirements for informing Affected Populations and Organisations of the impacts of Spills and Leakages. Impact assessments and remediation actions relating to Spills and/or Leakages have been disclosed, and no such incidents have been reported since 2001. Relevant information has been disclosed in the Entity's Sustainability Report (Leakage Management, page 26; Waste Management and Other Environmental Information, page 28), available at: 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 Waste has been transferred and disposed of by qualified external vendors, which are monitored by the Entity. The quantities and disposal methods of Hazardous and Non-Hazardous Waste generated by the Entity are reported on 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 also available in the Entity's Sustainability Report (Waste Management and Other Environment, page 28), available at: 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.

CRITERION	RATING	COMMENT
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 and set targets to minimise Dross generation. The Entity's generated Dross has been transferred to an external Dross processor for recovery, and the recovered Aluminium is recycled and reused by the Entity. The recovery rate achieved by the external Dross processor is monitored periodically to maximise Aluminium recovery. Periodic meetings are conducted with the external Dross processor to discuss options to improve Dross residue recycling rates and to identify alternative recycling options for unrecovered Dross. Residual materials from recovered Dross are currently used as raw materials for deoxidisers and construction material.
7. Water Stewardship		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity utilises only freshwater supplied by the Government agency from the nearby Daeam Dam for production, canteen, and office administration purposes. A water flow diagram has been developed, detailing water withdrawal and use by source and type. The Entity monitors, controls, and sets targets for water usage and balance. The Entity's water risk assessment determined that the Entity's operational, internal, and external risks within its Area of Influence have been considered. Due to the nature of the production processes and existing water Management Systems, water-related risks have been assessed as low in the local water environment. Relevant information has been disclosed in the Entity's Sustainability Report (Water Management, page 24), available at: https://ulsanaluminum.com/home/vision/vision01.jsp There have been no reported instances of water shortage to date.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as its water risk assessment rated and documented water impacts as low.
8. Biodiversity and Ecosystem Services		
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 Ecosystem Services. The Entity's Off-Site Risk Assessment and Environmental Aspect Assessment has addressed Biodiversity and ecosystem-related risks and impacts. The risks and impacts associated with the Entity's operations within its Area of Influence have been assessed as low and have been reported in the Sustainability Report (Biodiversity Assessment, page 27), available at: 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 to the Entity, as the risks to Biodiversity and Ecosystem Services have been assessed as low, and no Priority Ecosystem Services have been identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as the risk to Biodiversity and Ecosystem Services has been assessed and documented as low.

CRITERION	RATING	COMMENT
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as the risks to Biodiversity and Ecosystem Services have been assessed as low. No Priority Ecosystem Services have been identified, as the Entity is located within an industrial complex.
8.4 Alien Species	Conformance	The Entity has taken measures to prevent the introduction of Alien Species that may have Material adverse impacts on Biodiversity and Ecosystem Services. Periodic pest control activities have been conducted across the Entity's premises. Wooden material used by the Entity is heat-treated to prevent the introduction of Alien Species, and 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' approach for World Heritage Properties in accordance with the ASI Performance Standard Manual. The list of World Heritage Properties in Korea has been identified through the official website at: https://unesco.or.kr/ Considering the Entity's location within an industrial complex, the Entity's risk identification and assessment has demonstrated that there are no World Heritage Properties within its Area of Influence, and the associated risk has been assessed as low.
8.6a-d Protected Areas	Conformance	The Entity is located within an industrial complex and the Risk Assessment for Protected Areas has confirmed a risk rating of low. The Entity's risk assessment results and identification of Protected Areas have been disclosed in the Entity's Sustainability Report (Cultural Heritage and Protected Areas, page 39), available at: https://ulsanaluminum.com/home/vision/vision01.jsp
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 annual risk assessments addressing labour, Human Rights, and ethics, including a compliance assessment. The process involves mapping Affected Populations and Organisations within its supply chain and identifying, assessing, and evaluating potential risks. Control measures and targets have been implemented, and periodic reviews of Human Rights performance have been conducted. As a result, no adverse Human Rights impacts have been identified. The Entity commits to respecting Human Rights in its Code of Conduct, available at: https://ulsanaluminum.com/home/vision/vision03.jsp The Entity's Diversity Standard includes commitments to respecting diversity, including gender-responsive commitments regarding Human Rights, available at: https://ulsanaluminum.com/home/vision/vision03.jsp
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established and implemented strategies and actions to promote gender diversity and women's empowerment. Relevant key performance indicators for promoting gender equity have been established, monitored, and reviewed annually by Senior Management. The Entity's Employment Regulations have identified

CRITERION	RATING	COMMENT
		and addressed legal requirements related to women's rights, including maternity protection. Grievances related to women's rights have been reviewed, and appropriate actions have been taken. The Entity's measures, programmes, and effectiveness in promoting gender equity have been disclosed in the Entity's Sustainability Report (Gender Equity and Female Rights Improvement, page 41–43), available at: https://ulsanaluminum.com/home/vision/vision01.jsp
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity 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 to the Entity 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 to the Entity as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity's review of official government websites, including the Land Use and Development Information Service (www.eum.go.kr) and the Korea Heritage Service (http://www.khs.go.kr), as well as the Entity's Labour, Human Rights, and Ethics Risk Assessment indicate that no sacred or cultural heritage sites and values have been identified within the Entity's Area of Influence. Relevant information is disclosed in the Entity's Sustainability Report (Cultural Heritage and Protected Areas, page 39), available at: https://ulsanaluminum.com/home/vision/vision01.jsp
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as no New Projects or Major Changes have occurred since the Entity joined ASI, and no displacement or resettlement activities have been required.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established a Policy to respect the relevant legal and customary rights and interests of Affected Populations and Organisations, including Local Communities. The Entity has conducted relevant risk assessments and established plans that are implemented and reviewed periodically. In accordance with the Entity's ASI Performance Standard Manual, the results of the identification and risk assessment of Affected Populations and Organisations, together with key Stakeholder contact information, have been disclosed in the Entity's Sustainability Report (Indigenous Peoples and Local Community, page 40), available at: https://ulsanaluminum.com/home/vision/vision01.jsp The Entity also conducts various activities, including charity and support initiatives for Affected Populations and Organisations, which

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		have been disclosed in the Entity's Sustainability Report (Indigenous Peoples and Local Community, page 40; Social Responsibility, page 45), available at: https://ulsanaluminum.com/home/vision/vision01.jsp
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	Novelis Korea oversees conflict mineral management, and the Entity has established Policies on conflict minerals as outlined in the Conflict Minerals Declaration, Novelis Mineral Sourcing Policy, Supplier Code of Conduct, and Conflict Mineral Management Report. The Entity's suppliers have been required to comply with conflict mineral requirements as specified in the Novelis Procurement Terms and Conditions. Roles, responsibilities, and supplier Due Diligence processes, including risk assessments, have been established. The Novelis Responsible Sourcing Policy is available at: https://novelis.com/wp-content/uploads/2026/03/Responsible-Sourcing-Policy.pdf The Conflict Mineral Management Report is available at: https://ulsanaluminum.com/home/vision/vision03.jsp
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has assessed the risks associated with conflict minerals in its relevant supply chains. The risk assessment has considered potential involvement in armed conflicts or Human Rights abuses, with relevant risks identified, assessed, and rated. Risks related to potential participation in armed conflicts or Human Rights abuses have been assessed as low.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a strategy to address identified conflict mineral risks, as outlined in the Entity's Conflict Minerals Report. The Entity's supply chain risk assessment has demonstrated no involvement in armed conflicts or Human Rights abuses. To maintain conformance, the Entity conducts regular supply chain Due Diligence and addresses 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 processes were included in the scope of this ASI Performance Standard Certification Audit and addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity's Due Diligence process and declaration of non-involvement in armed conflicts or Human Rights abuses have been reported in the Entity's Conflict Minerals Management Report, available at: https://ulsanaluminum.com/home/vision/vision03.jsp
9.9 Security practice	Conformance	The Entity's security services are outsourced, with the Contractor required to comply with the Entity's Supplier Code of Conduct. The risk assessment and compliance audit of security practices indicate that the relevant risk has been assessed as low, with no negative findings identified. The security provider does not conduct direct or indirect physical searches or restrict freedom of movement. No grievances or complaints related to security practices have been received to date.
10. Labour Rights		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity has committed to respecting Freedom of Association, as stated in its Code of Conduct, available at: https://ulsanaluminum.com/home/vision/vision03.jsp

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		The Entity has a Labour Union on-site, and Union leaders and representatives have been elected anonymously and directly by Workers. Workers have the right to either join or not join the Labour Union. The Entity is committed to respecting Collective Bargaining rights, and a formal Collective Bargaining Agreement has been developed.
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 there are no restrictions on the rights to Freedom of Association and Collective Bargaining under the Constitution of the Republic of Korea.
10.2a Child Labour	Conformance	The Entity commits to prohibiting Child Labour under 15 years of age. Young Workers under 18 years of age have been provided with special protection in accordance with legal requirements and are not permitted to work in hazardous conditions. There is no history or current use of Child Labour or young Workers under 18 years of age in any hazardous work activities.
10.3a-c Forced Labour	Conformance	The Entity commits to prohibiting Forced Labour, as addressed in its Code of Conduct and Supplier Code of Conduct. Workers have not been required to pay any deposits, savings, or recruitment fees. There are no foreign migrant Workers, including in-house sub-contractors. Labour contracts have been agreed upon and signed between the Entity and Workers, with no evidence of debt-bonded labour identified. Workers' original documents have not been retained, and Workers may terminate their employment by providing a required notice period without penalties. The Entity's Slavery and Human Trafficking Statement (Modern Slavery Statement), endorsed by Senior Management and including its Policy and Due Diligence process, is available at: https://ulsanaluminum.com/home/vision/vision03.jsp
10.4a-c Non-Discrimination	Conformance	The Entity has committed to prohibiting all forms of Discrimination, and relevant risk assessments have been conducted. The Entity's recruitment process, job advertisements, and job application templates indicate that employment decisions are based solely on candidates' ability to meet job requirements rather than personal characteristics. The Entity has implemented various initiatives to promote non-Discrimination, workplace diversity, and inclusion.
10.5 Communication and engagement	Conformance	Workers can freely raise concerns or complaints regarding working conditions, workplace issues, and compensation matters without the threat of reprisal, intimidation, Violence or Harassment. Direct and periodic communication between the Entity, Workers and their representatives has been established and implemented. Workers are aware of the available channels to lodge complaints or report concerns.
10.6a-g Violence and Harassment	Conformance	The Entity's Policy prohibiting Violence and Harassment has been addressed in the Code of Conduct and Supplier Code of Conduct, available at: https://ulsanaluminum.com/home/vision/vision03.jsp Relevant regulations, including disciplinary regulations, have been established and maintained. Policies have been implemented in

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		consultation with Workers' representatives through mechanisms such as quarterly Labour Management Council meetings. Risk assessments and control measures addressing the prohibition of abuse, Harassment and sexual Harassment have been developed and implemented. Workers have been provided with training and communication on relevant regulations and control measures.
10.7a-d Remuneration	Conformance	The Entity's Employment Rules and supporting regulations have established requirements related to remuneration. Workers are paid at least the legal minimum wage, with 150% of the ordinary wage paid for Overtime, night shifts, and holiday work. Workers have received payslips detailing their remuneration, including base wages, Overtime wages, allowances, calculation methods, and deductions. Payments are made directly to Workers through monthly bank transfers.
10.8a-c Working Time	Minor Non-Conformance	The Entity has established regulations on working hours, rest periods, and leave entitlements, and conducted formal risk assessments on these aspects. Based on a sample review of working hour records undertaken during the Audit, Workers receive an average of one day off every seven days. In-house subcontractor working hours, however, exceeded the legal limit of 52 hours per week in one percent of sampled workweeks, with one maximum recorded working time of 57 hours in a single week.
10.9a-b Informing Workers of Rights	Conformance	Workers have been informed of their rights as described in the Entity's Code of Conduct, Collective Bargaining Agreement, Employment Regulations, Labour Contracts, and other relevant regulations or Policies through the Entity's intranet, notice boards, and training programmes.
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 ISO 45001:2018. The legal register has been maintained and updated, and periodic risk assessments, internal audits, and management reviews have been conducted. The Entity's Occupational Health and Safety (OH&S) Policy is available at: https://ulsanaluminum.com/home/vision/vision02.jsp The Entity's Code of Conduct includes commitments to comply with relevant legal requirements and pursue continuous improvement, and is available at: https://ulsanaluminum.com/home/vision/vision03.jsp
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 OH&S Management System performance. Internal and external communications related to OH&S aspects have been regulated. The effectiveness of the OH&S Management System, including leading and lagging indicators and comparative analysis of performance against peer Businesses and leading practices, has been disclosed in the Entity's Sustainability Report (Health and Safety Indicators, page 29), available at: https://ulsanaluminum.com/home/vision/vision01.jsp
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established procedures for Worker consultation and participation in OH&S matters. Periodic Health and Safety Committee meetings involving labour representatives and Contractors have been

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		conducted to discuss and improve OH&S issues, with relevant outcomes communicated to Workers. Workers can freely report 'near-miss' incidents and concerns, provide input on Health and Safety matters, and participate in the implementation of improvement actions where 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)
4	29 October 2025	Corrected 'Certification Number' from '401' to '159'.
5	10 August 2026	Surveillance Audit