
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOA MASSENA

CERTIFICATE
NUMBER

186

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

2 MARCH 2022

DATE OF EXPIRY

1 MARCH 2023

CERTIFIED SINCE

2 MARCH 2022

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

Aluminum Smelting, Casthouse and administrative
associated facilities at Alcoa Massena (USA).

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa Massena
CERTIFICATION SCOPE	Aluminum Smelting, Casthouse and administrative associated facilities at Alcoa Massena (USA).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	24 – 25 January 2022
AUDIT REPORT SUBMISSION	5 February 2022
AUDIT SCOPE	<p>The audit scope covered the Aluminum Smelting, Casthouse and administrative associated facilities at Alcoa Massena (USA).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (January 2022), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional 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

2 March 2022 – 1 March 2023

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

1 September 2022

CERTIFICATE
NUMBER

186

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Standard Operating Procedures to ensure the identification of applicable regulatory requirements and evaluation of compliance to the applicable regulatory requirements. It was observed there is a robust governance framework in place for Business Ethics and Compliance. Training is delivered to relevant personnel on a regular basis. A regulatory compliance audit is periodically performed by the corporate functions. Compliance status is reviewed by the facility senior management during the annual management review.
1.2 Anti-Corruption	Conformance	The Entity has defined and implemented policies and procedures against Corruption in various forms, consistent with Applicable Laws and prevailing international standards. Training was provided to all identified employees. An Integrity Line is established for reporting any concerns related to Corruption. Alcoa Corporate monitor any concerns and take necessary actions. No Corruption cases were found for the site for the recent years.
1.3 Code of Conduct	Unable to Rate	The Entity has developed policies, standards, and relevant documents to clearly communicate its requirements related to the Code of Conduct. Training is provided annually and during the new employee on-boarding process to ensure proper understanding of the policies and standards. An Integrity Line was established for reporting any concerns related to conduct. Alcoa Corporate functions monitor any concerns and take necessary actions. Whilst records are confirmed, the effective implementation of the relevant policies and standards could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has defined documented Policies at the Alcoa Corporate and site level, which cover human rights, Environment, Health and Safety (EHS), social, security, corporate governance, and international trade compliance. The Corporate Safety, Sustainability and Public Issues Committee has responsibilities and authority

CRITERION	RATING	COMMENT
		<p>to review the appropriateness of the Policies and oversee implementation.</p> <p>The facility EHS Policies are reviewed annually by the site management team. The Policies are communicated to all employees and contractors through training and the plant policy boards.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has defined documented Policies at the Alcoa Corporate and site level, which cover human rights, Environment, Health and Safety (EHS), social, security, corporate governance, and international trade compliance.</p> <p>The Corporate Safety, Sustainability and Public Issues Committee has responsibilities and authority to review the appropriateness of the Policies and oversee implementation.</p> <p>The site EHS Policies are reviewed annually by the site management team. The Policies were communicated to all employees and contractors through training and the plant policy boards.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Unable to Rate	<p>The Entity publishes EHS Policies on the intranet and the site EHS Policies are also communicated through the plant policy boards.</p> <p>The Alcoa Corporate policies and documents related to Environmental, Social and Governance aspects are mainly communicated externally through Alcoa's website:</p> <p>http://investors.alcoa.com/corporate-governance/governance-documents</p> <p>https://www.alcoa.com/global/en/who-we-are/values/default.asp</p> <p>https://www.alcoa.com/sustainability/en/environment-health-safety.asp</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp</p> <p>Whilst records are confirmed, the effective implementation of the policies communication could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
2.2 Leadership	Conformance	<p>The site EHS Manager has been assigned as the Management Representative for the implementation of the ASI Performance Standard at the Entity. The role of the Management Representative has been communicated internally to all employees through the alignment meeting for the ASI Certification process.</p>

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Unable to Rate	<p>The Entity has implemented an ISO 14001 and ISO 45001 aligned EHS Management System, based on the Corporate EHS Management System Standard, which provides an overview of the Corporate Integrated EHS Management System and also sets the minimum expectation for EHS Management Systems for the Entity. All the key elements of ISO 14001 have been properly implemented. Whilst records are confirmed, the effective implementation of the EHS Management System could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
2.3b Environmental and Social Management Systems (social)	Unable to Rate	<p>Corporate policies, management system and standards regarding social management have been developed and implemented. An Alcoa Material Assessment was performed in 2020 to determine material issues at the global level. The Entity has conducted a self-assessment of implementation of the Social Management System. The Entity also conducted a Stakeholder Engagement Dashboard Review in 2021. Whilst records are confirmed, the effective implementation of the Social Management System could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
2.4 Responsible Sourcing	Unable to Rate	<p>The Corporate function has overall responsibility for responsible sourcing. Alcoa's Corporate Supplier Sustainability Program, which is conducted in partnership with EcoVadis and defines its processes for managing suppliers' sustainability and corporate social responsibility performance, including, 1) communicate expectations through Supplier Standards document, 2) assess suppliers for all in-scope suppliers, 3) develop and educate by providing guidance to suppliers on improvement opportunities, and 4) monitor suppliers for compliance and development of action plans if needed. Location buyers assist with the identification and management of suppliers in these programs.</p> <p>Note: In-scope suppliers for the Program are those with the highest materiality of spend and in supplying categories that pose the greatest sustainability risk to Alcoa.</p> <p>Alcoa Supplier Standards are available from the website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier_Standards.pdf</p>

CRITERION	RATING	COMMENT
		<p>Interview demonstrated that the corporate responsible and the site buyer were highly aware of the requirements and their application of the Supplier Sustainability Program.</p> <p>Whilst records are confirmed, the effective implementation of the responsible sourcing program could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
2.5 Impact Assessments	Conformance	<p>The Entity's project delivery process requires the evaluation of environmental, energy, safety, cultural and human rights impacts when performing major projects, by using the Project, Environmental, Health & Safety Review (PEHSR) Form. The PEHSR needs to be completed prior to the approval of a project and grant of project funding. Review of a recently completed PEHSR form demonstrated the correct use of the form for performing environmental, social, cultural and Human Rights Impact Assessments.</p>
2.6 Emergency Response Plan	Unable to Rate	<p>The Entity has developed an Emergency Response Action plan (ERAP) as per the Alcoa Corporate standard.</p> <p>The Entity has an in-house fire brigade team consisting of 25 members. Training was provided to the emergency response team as per Emergency Response Team Training Schedule. Local Fire Department officers are invited to the site to familiarize with the site's emergency-related arrangements approximately every three years.</p> <p>Whilst records are confirmed, the effective implementation of the ERAP could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
2.7 Mergers and Acquisitions	Conformance	<p>Alcoa reviews environmental, social and governance issues as part of the Due Diligence process for mergers and acquisitions. These elements are governed centrally by Alcoa Corporation. There were no local examples of mergers and acquisitions at the Entity.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>Alcoa Corporate implements a standard on Environment, Health and Safety Assessments of Prospective Acquisitions and Divestitures, and financial accounting standards on Asset Retirement Obligations and Environmental Tax Only Assets. These standards define how environmental, social and governance issues are reviewed in the</p>

CRITERION	RATING	COMMENT
		<p>processes for closure, decommissioning and divestment, as well as how to addresses individual liabilities at the relevant locations.</p> <p>The Entity follows procedures instructed by Alcoa Corporate functions in such events.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity prepares the annual Sustainability Report in line with GRI G4 Sustainability Reporting Guidelines and makes the information publicly available on the company website: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p> <p>The Entity also provides its Annual Report and Proxy Statement on the company website: https://investors.alcoa.com/financials/annual-reports-and-proxy-statements/default.aspx</p> <p>The Entity holds regular Community Advisory Board Meetings to present information on governance, material environmental, social and economic impacts.</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in the Alcoa Annual Report on page 108 under Note S - Contingencies and Commitments: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p> <p>The Entity holds regular Community Advisory Board Meetings to present information on governance, material environmental, social and economic impacts.</p> <p>The Entity uses the Sphera system for incidents and non-conformance reporting, corrective action determination, and action status tracking. The Entity's Monthly EHS Dashboard tracks performance including potential and known non-compliances, which confirms no non-compliances of high and major categories have occurred for the last two years.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Alcoa Corporate Anti-Corruption Policy and Procedures define requirements related to payments to governments.</p> <p>Payments to governments, including taxes or tributes are reported in Alcoa's Annual Report 2021, page 48: https://investors.alcoa.com/financials/annual-reports-and-proxy-statements/default.aspx</p>

CRITERION	RATING	COMMENT
		The Entity's financial and business processes were audited by the Corporate function and external party. The Audit Report for 2018 does not find any issues related to payments to government.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>Approaches for the reporting and filing of complaints and concerns are defined in the standards for Handling of Public Community Complaints or Concerns and Integrity Line Card via email, postal mail, internet and telephone.</p> <p>For employees, contact information is also posted on notice boards and reviewed during the onboarding process. For external stakeholders, contact information is made aware to stakeholders at the Entity's Community Advisory Board Meetings. Complaint Tracker is used for documenting any complaints or concerns with information on the responsible department and action plan. No complaints or concerns were received in 2021.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Alcoa Corporate procedure 'Life Cycle Assessment' defines the requirements for conducting, reporting and sharing information related to Life Cycle Assessment studies. The procedure requires that "Life Cycle Assessment studies must conform to the principles and practices defined in the International Organization for Standardization documents for life cycle assessments, specifically ISO standards 14040/44."</p> <p>An Environmental Product Declaration (EPD) was issued to Alcoa by UL Environment in June 2017 which covers the company product "Ecolum Cast Aluminum Products". The Entity is one of Alcoa's sites manufacturing this product.</p> <p>This EPD is issued in accordance with ISO 14025, with a system boundary of cradle-to-gate, which includes raw material supply, transport to the manufacturer and manufacturing. The EPD is publicly available from the UL Environment website: https://spot.ul.com/main-app/products/detail/5ad1f04355b0e82d946abb93?page_type=Products%20Catalog</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Alcoa Corporate procedure 'Life Cycle Assessment' defines requirements for conducting, reporting and sharing information related to Life

CRITERION	RATING	COMMENT
		<p>Cycle Assessment studies. The procedure requires that "Life Cycle Assessment studies must conform to the principles and practices defined in the International Organization for Standardization documents for life cycle assessments, specifically ISO standards 14040/44."</p> <p>An Environmental Product Declaration (EPD) was issued to Alcoa by UL Environment in June 2017 which covers the company product "Ecolum Cast Aluminum Products". The Entity is one of Alcoa's sites manufacturing this product.</p> <p>This EPD is issued in accordance with ISO 14025, with a system boundary of cradle-to-gate, which includes raw material supply, transport to the manufacturer and manufacturing. The EPD is publicly available from the UL website: https://spot.ul.com/main-app/products/detail/5ad1f04355b0e82d946abb93?page_type=Products%20Catalog</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>An Environmental Product Declaration (EPD) is publicly available from the website of UL Environment: https://spot.ul.com/main-app/products/detail/5ad1f04355b0e82d946abb93?page_type=Products%20Catalog</p>
4.2 Product design	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Unable to Rate	We have assessed this Criterion as 'Unable to Rate', until the facility can be assessed during an on-site audit.
4.3b Aluminium Process Scrap (alloy separation)	Unable to Rate	We have assessed this Criterion as 'Unable to Rate', until the facility can be assessed during an on-site audit.
4.4a Collection and recycling of products at end-of-life (strategy)	Unable to Rate	We have assessed this Criterion as 'Unable to Rate', until the facility can be assessed during an on-site audit.
4.4b Collection and recycling of products at end-of-life (engagement)	Unable to Rate	We have assessed this Criterion as 'Unable to Rate', until the facility can be assessed during an on-site audit.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	According to the US EPA (United States Environmental Protection Agency) Greenhouse Gas (GHG) Reporting Program, the Entity reports its GHG emissions annually by using EPA's electronic

CRITERION	RATING	COMMENT
		<p>Greenhouse Gas Reporting Tool (eGGRT). The Entity's facility information and reported GHG emissions are publicly available from the US EPA website: https://ghgdata.epa.gov/ghgp/service/facilityDetail/2020?id=1012517&ds=E&et=&popup=true</p> <p>The US EPA eGGRT requires the reporting company's management to certify reported information prior to the submission.</p> <p>The Entity also reports its energy consumption and GHG emissions to the Alcoa Corporate system, which is used for the preparation of the Alcoa annual Sustainability Report. The Alcoa Sustainability Report 2020 with a third-party assurance statement is available from the company website. Relevant sections include page 106 Climate Protection; page 110 Energy and pages 133-134 Assurance Statement: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity's emissions reduction target is included in the Alcoa 10 year plan for GHG emissions reductions over 2021 - 2030. In this document, the GHG emissions reduction targets are determined for each year of the 10 years' period at each Alcoa site. The Entity also developed action plans and initiatives to achieve its reduction targets. GHG and energy monitoring records are maintained at the Entity to monitor the progress towards achieving the reduction targets.</p> <p>In the corporate annual Sustainability Report 2020, overall GHG emissions reduction targets are publicly disclosed, with strategic actions to achieve the reduction targets presented in more detail on pages 108-109 Decarbonization Strategy: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p>
5.3a Aluminium Smelting (management system)	Unable to Rate	<p>Standard Operating Procedures (SOPs) incorporate requirements for operations, safety, and environment, including controls related to direct GHG emissions from the processes. The SOPs also define training requirements.</p> <p>Whilst records are confirmed, the effective implementation of the management system for Aluminium smelting could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>

CRITERION	RATING	COMMENT
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity's GHG emission intensity for 2020 was 2.21 tonnes of CO ₂ equivalent per tonne of aluminium and 2.30 tonnes of CO ₂ equivalent per tonne of aluminium for 2019.
5.3c Aluminium Smelting (after 2020)	Not Applicable	The Entity has no plans to commence a new Aluminium Smelter after 2020.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Unable to Rate	<p>The Entity annually reports its emission inventory as required by the Air Permit issued by New York State Department of Environmental Conservation (NYSDEC).</p> <p>The Entity is currently in non-attainment status for SO₂ (sulfur dioxide) per the 2010 National Ambient Air Quality Standards (NAAQS). As per the meetings with the NYSDEC and US EPA, the Entity has commenced the process to implement a capital project by the end of 2024 which upon completion is expected to bring the facility back into the attainment status by 2026, which is the deadline for the Entity to achieve attainment status.</p> <p>Alcoa's aggregated performance regarding emissions is presented in the Sustainability Report 2020, which is available at the company's website, page 114-115 Emissions: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p> <p>Whilst records are confirmed, the appropriateness of emissions monitoring and reporting could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
6.2 Discharges to Water	Unable to Rate	<p>The Entity leases property from Arconic Corporation (Arconic) and is legally bound by the lease to comply with Arconic's State Pollutant Discharge Elimination System (SPDES) Permit. Discharges to Water are managed, quantified, and reported by Arconic as required by the SPDES permit.</p> <p>A Memorandum of Understanding between Arconic and the Entity describes processes and procedures by which the Entity complies with the Arconic SPDES permit. The Entity has also implemented "Massena Operations Water Management Plan" to define requirements related to waste water discharge.</p> <p>Alcoa's aggregated performance regarding water outputs is presented in the Sustainability Report 2020, which is available at the company's website, page 95-97 Water:</p>

CRITERION	RATING	COMMENT
		<p>https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p> <p>Whilst records are confirmed, the appropriateness of processes related to wastewater management could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Facility is obliged to develop, implement, and maintain a Spill Prevention, Control and Countermeasure (SPCC) Plan, to be prepared by a professional engineering service provider. The Plan identifies inventory of materials, as well as the areas of the operation with the potential for Spills and Leakages. The plan also includes a risk assessment of Spills and Leakages occurring, and defines containment measures, requirements for inspection and monitoring, incident response and reporting, training, and record keeping.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Unable to Rate	<p>The Spill Prevention Control and Countermeasure (SPCC) Plan defines containment measures, requirements for inspection and monitoring, incident response and reporting, training, and record keeping. Training and guidance were provided to all the employees regarding the Plan's requirements. Regular inspections were performed as per the Plan's requirements. Self-assessment is made annually to review the implementation status of the Plan.</p> <p>Whilst records are confirmed, the appropriateness of the SPCC Plan could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>Specific requirements for reporting, including when to report and how to report, are defined in the Emergency Response Action Plan (ERAP) and the Spill Prevention Control and Countermeasure (SPCC) Plan.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>All reportable Spills (greater than five gallons or reach land or reach water) are entered into the Entity's on-line system and are consolidated in the corporate Sustainability Report on pages 100-101: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p>
6.5a Waste management and reporting (strategy)	Unable to Rate	<p>The Entity has developed, implemented, and maintained a Waste Management Plan, which</p>

CRITERION	RATING	COMMENT
		<p>includes a waste strategy and minimization plan, waste summary, Waste Management Hierarchy, inspections and record keeping. The Entity also submits to the New York State Department of Environmental Conservation (NYSDEC) a Hazardous Waste Reduction Plan biennially.</p> <p>The Entity performs a waste management self-assessment annually to monitor the implementation of its Waste Management Plan. NYSDEC also conducts hazardous waste inspections at the facility and the recent inspection indicated no violations observed.</p> <p>Whilst records are confirmed, the effective implementation of the Waste Management Plan could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>An Annual Hazardous Waste Generator Report is submitted to the United States Environmental Protection Agency (USEPA) and the New York State Department of Environmental Conservation. The reports cover quantities, treatment codes, hazardous codes for each waste, transporters and treatment facilities.</p> <p>Alcoa also publishes aggregated performance regarding waste generation in its annual Sustainability Report on page 98-100: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Unable to Rate	The Entity has developed, implemented and maintained a Spent Pot Lining (SPL) Management

CRITERION	RATING	COMMENT
		<p>Plan to prevent the release of SPL to the environment. The plan covers containment building management, SPL management, SPL pollution prevention and management, including training, inspection, and records retention.</p> <p>Whilst records are confirmed, the effective implementation of the Massena West Spent Pot Lining Management Plan could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Unable to Rate	<p>The Entity currently does not recover and recycle carbon or refractory material from its Spent Pot Lining (SPL). All the SPL generated at the Entity is loaded on water-tight railcar flats and transported to an external treatment facility. However, the Entity has implemented operational controls to reduce SPL waste generation by removing materials that are not SPL, as outlined in Appendix C - Operational Control Summary Table of the Massena West Lining Management Plan.</p> <p>Whilst records are confirmed, the effective implementation of the Massena West Spent Lining Management Plan could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Unable to Rate	<p>All the SPL generated at the Entity is loaded on water-tight railcar flats and transported to an external treatment facility, where the SPL is treated prior to landfill.</p> <p>Whilst records are confirmed, the effective implementation of the Massena West Spent Lining Management Plan could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	<p>All SPL generated at the Entity is loaded on water-tight railcar flats and transported to an external treatment facility, where the SPL is treated prior to landfill.</p> <p>Alcoa Corporate continually reviews alternative options to landfilling of treated SPL, for example, developing recycling relationships with cement kiln facilities to use SPL as an alternative fuel. In addition, Alcoa participates with the Aluminum Association and the EPA-Aluminum Industry SPL Voluntary Partnership toward development of</p>

CRITERION	RATING	COMMENT
		sustainable, next generation SPL management technologies. Alcoa also continues to focus on pot life extension hereby decreasing the number of pots relined per year.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	All SPL generated at the Entity is loaded on water-tight railcar flats and transported to an external treatment facility, where the SPL is treated prior to landfill. The Entity does not discharge any SPL to marine or aquatic environments.
6.8a Dross (recovery)	Unable to Rate	The Entity is ISO 9001 certified for its activities at the Casthouse. One of its objectives is recovery percentage within the casthouse. Dross percentage is also monitored in the Entity's KPI - Process Data. Training and competency level of operators are managed to maximize Dross and Dross residue treatment. The Alcoa Global Dross Reduction Initiative is deployed at the Entity, including following best Dross reducing practices, establishing year-over-year performance improvement targets, and use of increased data visibility to make informed process improvements. Whilst records are confirmed, the effective implementation of controls and relevant processes relating to the recovery and management of Dross could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.
6.8b Dross (recycling)	Conformance	The Entity sends all its recovered mixed Dross to a contracted company for metal recovery. The residue (salt cake) from the metal recovery process is sent to landfill. The Entity is planning to implement certain process improvements to reduce Dross formation thereby reducing dross salt cake to landfill.
6.8c Dross (review of alternatives)	Conformance	The Entity is planning to implement certain process improvements in 2022 to reduce Dross formation thereby reducing the amount of dross salt cake sent to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Massena Operations Water Management Plan defines approaches for determining the Entity's water balance. A water balance is prepared annually, which presents the water inputs and output flows, sources and destination. Water usage is monitored through

CRITERION	RATING	COMMENT
		<p>the Entity's utility system.</p> <p>The Entity's Water Withdrawal Permit was transferred from another company to Alcoa Massena Facility in September 2021. As the permit holder, the Entity must annually submit an Water Withdrawal Reporting Form to New York State Department of Environmental Conservation, commencing in 2022.</p>
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity has determined that water-related risks are low due to impacts arising from water use as it relates to the source watershed. This is supported by the estimates that the Entity's average outflow is relatively small (less than one percent per year) in comparison to the total volume of water contained in the water source system.</p> <p>The Entity is obliged to meet the conditions defined in the Water Withdraw Permit.</p>
7.2a Water management (management plans)	Unable to Rate	<p>The Massena Operations Water Management Plan determines risks related to water management and defines requirements regarding water management. Whilst records are confirmed, the effective implementation of the Water Management Plan and compliance with applicable law could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
7.2b Water management (monitoring)	Unable to Rate	<p>The Massena Operations Water Management Plan defines requirements related to review and monitoring activities to confirm effectiveness of water management plans.</p> <p>Whilst records are confirmed, the effective implementation of controls and relevant processes relating to the recovery and management of Dross could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Water Withdrawal Permit was transferred from Arconic Corporation to the Entity in September 2021. The permit holder must annually submit a Water Withdrawal Reporting Form to New York State Department of Environmental Conservation. The Entity will commence reporting in 2022.</p> <p>Alcoa's aggregated water usage is presented in the Alcoa Sustainability Report 2020 on page 95-96: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p>

CRITERION	RATING	COMMENT
8.1 Biodiversity assessment	Unable to Rate	<p>In the Alcoa Massena Biodiversity Action Plan Procedure, the Entity provides background information related to biodiversity and defines approaches and requirements to protect biodiversity values, including areas of influence, legal and related requirements regarding biodiversity, biodiversity values, biodiversity risk analysis, biodiversity management (monitoring program, biodiversity action plan, and stakeholder communication). An updated risk assessment and actions are detailed in the spreadsheet of Alcoa Massena Biodiversity Risk Assessment and Action Plan.</p> <p>Whilst records are confirmed, the effective implementation of the Biodiversity Action Plan could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
8.2a Biodiversity management (biodiversity action plans)	Unable to Rate	<p>In the Alcoa Massena Biodiversity Action Plan Procedure the Entity provides background information related to biodiversity and defines approaches and requirements to protect biodiversity values, including areas of influence, legal and related requirements regarding biodiversity, biodiversity values, biodiversity risk analysis, biodiversity management (monitoring program, biodiversity action plan, and stakeholder communication). Up to date risk assessment and actions are detailed in the Alcoa Massena Biodiversity Risk Assessment and Action Plan.</p> <p>Whilst records are confirmed, the effective implementation of the Biodiversity Action Plan could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Unable to Rate	<p>In the Alcoa Massena Biodiversity Action Plan Procedure the Entity provides background information related to biodiversity and defines approaches and requirements to biodiversity management. The biodiversity management section of the Procedure specifies that biodiversity management at the Entity has followed the hierarchy of mitigation both in the planning, design phase and in the current operational phase.</p> <p>Whilst records are confirmed, the effective implementation of the Biodiversity Action Plan could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Conformance	In the Alcoa Massena Biodiversity Action Plan Procedure the Entity details its requirements for stakeholder communication, including monitoring reports with relevant government agencies and meetings with the Local Community Advisory Board. Alcoa's corporate policies, actions, and overall performance related to biodiversity is presented in the Alcoa Sustainability Report 2020 on page 89-92: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf
8.3 Alien Species	Unable to Rate	In the Alcoa Massena Biodiversity Action Plan Procedure the Entity identifies the risks and controls related to Alien Species control. Wood pallets used for raw material import and product export are identified as the relevant risk. International Standards for Phytosanitary Measures #15 (ISPM 15) are followed to ensure use of properly treated wood pallets. Whilst records are confirmed, the effective implementation of requirements related to the management of Alien Species could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is Not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.1b Human Rights Due Diligence (process)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.

CRITERION	RATING	COMMENT
9.1c Human Rights Due Diligence (remediation)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.2 Women's Rights	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.3 Indigenous Peoples	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.4 Free, Prior, and Informed Consent (FPIC)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.5 Cultural and sacred heritage	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.6a Resettlements (avoid or minimise)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.6b Resettlements (where unavoidable)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.7a Local Communities (rights and interests)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.7b Local Communities (impacts)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.7c Local Communities (livelihoods)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.8 Conflict-Affected and High-Risk Areas	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
9.9 Security practice	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
PRINCIPLE 10 LABOUR RIGHTS		

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.2a Child Labour (minimum age)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.2b Child Labour (hazardous)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.2c Child Labour (worst forms)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.3a Forced Labour (human trafficking)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.3b Forced Labour (deposits, fees, advances)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.3c Forced Labour (migrant workers)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.3d Forced Labour (debt bondage)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.3e Forced Labour (freedom of movement)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.3g Forced Labour (freedom to terminate employment)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.

CRITERION	RATING	COMMENT
10.4 Non-Discrimination	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.5 Communication and engagement	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.6 Disciplinary practices	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.7a Remuneration (living wage)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.7b Remuneration (method of payment)	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
10.8 Working Time	Unable to Rate	This Criterion has been assessed as 'Unable to Rate' until the Entity can be assessed during an on-site component of the audit.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Unable to Rate	The Entity's Health and Safety Policy is endorsed by the Location Manager. The Policy is communicated to employees through the employee onboarding process and contractor orientation process respectively. Whilst records are confirmed, the effective implementation of requirements related to Policy review could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Unable to Rate	The Entity's Health and Safety Policy is signed by the Location Manager. The Policy is communicated to employees through the employee onboarding process and contractor orientation process respectively. Whilst records are confirmed, the effective implementation of requirements related to Policy review, communication, understanding and implementation could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Unable to Rate	<p>The Entity's Health and Safety Policy includes the statement "We comply with all laws and set higher standards for ourselves and our suppliers where unacceptable risks are identified".</p> <p>Whilst records are confirmed, the effective implementation of requirements related to Policy review, communication, understanding and implementation could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Unable to Rate	<p>The Entity's Health and Safety Policy includes the statements 'We have adopted and encourage the right to shut down or refuse unsafe work' and 'We encourage employee participation and promote awareness of EHS threats and opportunities'.</p> <p>Whilst records are confirmed, the effective implementation of requirements related to Policy review, communication, understanding and implementation could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
11.2 OH&S Management System	Unable to Rate	<p>The Corporate EHS (Environmental, Health and Safety) Management System Standard provides an overview of the Corporate Integrated EHS Management System and sets the minimum expectation for EHS Management Systems for the Entity.</p> <p>Whilst records are confirmed, the effective implementation of requirements related to Policy review, communication, understanding and continual improvement of the OHS component of the EHS Management System could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>
11.3 Employee engagement on health and safety	Unable to Rate	<p>The Entity's joint health and safety meeting is deployed for employee engagement, which encompasses numerous management individuals and is open to all union employees for participation.</p> <p>Whilst records are confirmed, the effective implementation of requirements related to employee engagement could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.</p>

CRITERION	RATING	COMMENT
11.4 OH&S performance	Unable to Rate	By using an OHS (occupational health and safety) Weekly Dashboard, the Entity monitors and weekly evaluates its OHS performance, including leading and lagging indicators. Whilst records are confirmed, the effective evaluation of OHS performance could not be assessed and therefore this Criterion is assessed as 'Unable to Rate', until the Entity can be further assessed during an on-site audit.

Document Control and Version History

Revision	Date	Notes
0	2 March 2022	Initial Certification Audit - Provisional Certification