
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

ALCOA CORPORATION

CERTIFICATE
NUMBER

30

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASURANCE
SERVICES UK
LTD.

DATE OF ISSUE

18 JULY 2022

DATE OF EXPIRY

17 JULY 2025

CERTIFIED SINCE

18 JULY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Alumar's Refining facilities (Brazil), including refining processes, port and administrative facilities, residue storage areas and landfill.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME Alcoa Corporation

ENTITY NAME Consórcio de Alumínio do Maranhão – ALUMAR

CERTIFICATION SCOPE Alumar's Refining facilities (Brazil), including refining processes, port and administrative facilities, residue storage areas and landfill.

SUPPLY CHAIN ACTIVITIES

- Alumina Refining

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Initial Certification Audit (1 - 5 April 2019)
- Re-Certification Audit (2 - 5 May 2022)

AUDIT FIRM DNV Business Assurance Services UK Ltd.

AUDIT DATE

- 1 - 5 April 2019 (Initial Certification Audit)
- 2 - 5 May 2022 (Re-Certification Audit)

AUDIT REPORT SUBMISSION

- 13 May 2019 (Initial Certification Audit)
- 22 June 2022 (Re-Certification Audit)

AUDIT SCOPE Certification Audit (1 - 5 April 2019)
Alumar's Refining facilities (Brazil), including refining processes, port and administrative facilities, residue storage areas and landfill.

Supply chain activities included in the audit scope:

- Alumina Refining

Please note that the audit scope does not include smelting facilities which have been decommissioned since 2015.

All relevant criteria in the ASI Performance Standard were included in the audit scope.

Re-Certification Audit (2 - 5 May 2022)

Alumar's Refining facilities (Brazil), including refining processes, port and administrative facilities, residue storage areas and landfill.

Supply chain activities included in the audit scope:

- Alumina Refining

Please note that the audit scope does not include smelting facilities which have been decommissioned since 2015.

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.
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CERTIFICATION
PERIOD

18 July 2022 – 17 July 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

17 July 2025

CERTIFICATE
NUMBER

30

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has a local department and a global corporate structure to manage the Legal requirements applicable to its operations. The ethical conduct and compliance Policies are available at:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption https://www.alcoa.com/global/en/who-we-are/ethics-compliance/international-trade-compliance-policy https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established an Anti-Corruption Policy approved by the Chief Executive Officer (CEO):</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption</p>
1.3 Code of Conduct	Conformance	<p>The Entity has a documented Code of Conduct that is communicated to all Stakeholders. The Code of Conduct is available at:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity implements and maintains environmental, social and governance Policies consistent with the practices included in the ASI Performance Standard. The Policies are available at:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/ehs-vision-values-mission-and-policy</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity's environmental, social, and governance Policies are approved by the plant General Manager.</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy https://www.alcoa.com/global/en/who-we-are/ethics-compliance/ehs-vision-values-mission-and-policy https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has established a Management System Policy, published and communicated to employees and contractors. This Policy includes Quality, Productivity and EHS aspects. For other social and</p>

CRITERION	RATING	COMMENT
		governance issues, refer to the Global Human Rights Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp and the Code of Conduct: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct.asp The Entity's Integrated Management System Policy is also printed and publicly displayed on the main gate (which the external people can access freely) and provided to local Stakeholders.
2.2 Leadership	Conformance	The Entity has global and local managers to ensure that ASI Performance Standard requirements are met.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an integrated Environmental Management System and holds a valid certificate to ISO 14001:2015.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity maintains implemented and documented Environmental and Social Management Systems.
2.4 Responsible Sourcing	Conformance	The Entity has established an adequate Responsible Sourcing Policy (Alcoa Suppliers Standards) for the evaluation of suppliers and subcontractors: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards
2.5 Impact Assessments	Conformance	The Entity has conducted Impact Assessments in the area of Bauxite waste, including assessments on Human Rights, environmental and social impact. However, there have been no New Projects or Major Changes since the Entity became a member of ASI.
2.6 Emergency Response Plan	Conformance	The Entity demonstrated the implementation of Emergency Response Plans, including the participation of internal and external stakeholders. Simulations and drills are conducted at periodic intervals to evaluate the effectiveness of these plans.
2.7 Mergers and Acquisitions	Conformance	The Entity has adequately defined the corporate process for Mergers and Acquisitions, divestitures and a strategy for entering into a new country.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has adequately defined the site closure plan containing all phases and investment required to close the site.

CRITERION	RATING	COMMENT
3.1 Sustainability Reporting	Conformance	Entity developed its Sustainability Report and communicated it to the various stakeholders. https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity has not received notifications, warnings, economic or operational sanctions for non-compliance with legal requirements applicable to its operations.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity undergoes annual corporate audits to ensure compliance. The Entity also has provisions regarding the communication of financial results in its internal policies. The Entity has implemented the Anti-Corruption Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption
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	The Entity has a local department and a global corporate structure to manage the legal requirements applicable to its operations. The ethical conduct and compliance Policies, including the complaints hotline, are available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption https://www.alcoa.com/global/en/who-we-are/ethics-compliance/international-trade-compliance-policy https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major product lines for which Aluminium is considered or used, based on ISO 14040:2006 and ISO 14044:2006.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed the Life Cycle Assessment (LCA) for Bauxite and Alumina with a cradle-to-gate approach which is made available to customers upon request. For further information refer to the 2021 Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Information on LCAs for Bauxite and Alumina are available upon request. The publicly shared reports

CRITERION	RATING	COMMENT
		include underlying assumptions and system boundaries. For further information refer to the 2021 Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has published an annual technical report of Greenhouse Gas (GHG) emissions data. The report is available at: https://registropublicodeemissoes.fgv.br/participantes/1386
5.2 GHG emissions reductions	Conformance	Alcoa has long-term strategic sustainability objectives that are integrated into all its businesses. The Entity participates in the GHG Protocol program and annually reports the emission and energy usage data on the Public Register of Emissions: https://registropublicodeemissoes.fgv.br/participantes/1386 The GHG (direct and indirect) emissions reduction targets are aligned with the below 2° C decarbonization path, to reduce GHG emissions intensity by 30 percent by 2025 and 50 percent by 2030 from a 2015 baseline: https://www.alcoa.com/sustainability/en/sustainability-at-alcoa/strategic-long-term-goals The Entity implements the Climate Change Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/climate-change-policy Information about the Entity's corporate strategy on air emissions included in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf

CRITERION	RATING	COMMENT
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE

6.1 Emissions to Air	Conformance	<p>The Entity has a Policy on climate change: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/climate-change-policy/Climate-Change-Policy-EN.pdf</p> <p>The GHG emissions data are published annually in the technical report: https://registropublicodeemissoes.fgv.br/participantes/1386</p> <p>The Entity published a Sustainability Report demonstrating its commitment and action on climate change: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
6.2 Discharges to Water	Conformance	The Entity has quantified, monitored and reported on Discharges to Water that may have adverse effects on humans or the environment.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has maintained an updated evaluation process of the main risk areas of its operations where Spills and Leakages can contaminate the air, water and/or soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has developed an Emergency Response Plan with the use of risk analysis techniques with the coordination of the Environment and Labor Safety Department and in collaboration with technicians and operators from the industrial complex.</p> <p>Information on the Entity's environmental performance is included in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented the Individual Emergency Plan and documents the official institutions to be communicated with immediately, regardless of the volume spilled. The Entity also has a system to communicate to affected parties the volume, type, and potential impact of significant Spills immediately following an incident. The Entity has not recorded a significant Spill since the beginning of its

CRITERION	RATING	COMMENT
		<p>operations. Information on the Entity's environmental performance is included in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity publicly discloses Spill Impact Assessments and remedial actions taken. However, the Entity has not recorded a significant Spill since the beginning of its operations. Alcoa has included information on significant Spills across its global operations in the annual Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. The Entity has established environmental targets for waste generation and disposal, including the reduction of landfilled waste by 15 percent by 2025 and 25 percent by 2030, from a 2015 baseline: https://www.alcoa.com/sustainability/en/sustainability-at-alcoa/strategic-long-term-goals</p> <p>The Inventory of Industrial Solid Waste is submitted annually to the Secretary of State for Environment and Natural Resources. Environmental performance on waste generation and disposal is published in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity has submitted the Inventory of Industrial Solid Waste to the Secretary of State for Environment and Natural Resources annually, in accordance with local law. Environmental performance on waste generation and disposal is published in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
6.6a Bauxite Residue (storage construction)	Conformance	<p>The Entity has Bauxite waste storage facilities and implemented appropriate controls to effectively prevent the release of Bauxite waste and leachates into the environment.</p>
6.6b Bauxite Residue (integrity checks and controls)	Conformance	<p>The Entity has issued an annual report on the stability inspection of Bauxite Residue storage systems following technical evaluation by a specialized company.</p>

CRITERION	RATING	COMMENT
6.6c Bauxite Residue (water discharge)	Conformance	The Entity has implemented operational procedures and monitoring to control and neutralize the discharge of Bauxite waste and water waste into the environment.
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	The Entity has implemented operational procedures and monitoring to control and neutralize the discharge of Bauxite waste and water waste into the environment. The Entity does not discharge bauxite waste to marine and aquatic environments.
6.6e Bauxite Residue (state of the art technologies)	Conformance	The Entity has developed and is implementing a 25 year Bauxite Residue Master Plan, which establishes the new constructions in accordance with new technologies.
6.6f Bauxite Residue (remediation)	Conformance	The Entity has defined a schedule that includes start time, closing time and closing rehabilitation concepts to be applied.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has prepared the Water Balance of the plant with inflows and outflows of water, Maps indicating all points of abstraction, Procedures for monitoring treated water, Procedure for monitoring groundwater abstraction.

CRITERION	RATING	COMMENT
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity evaluates and monitors the risks related to the abstraction, consumption, and destination of water and periodically reports its performance to the environmental agency.</p> <p>According to the published sustainability report, the entity communicates to the various stakeholders its performance and strategic actions for improvement regarding the management of water resources.</p> <p>https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
7.2a Water management (management plans)	Conformance	<p>The Entity has strategic objectives on Water Consumption from a 2015 baseline, reduce the intensity of our total water use from water-scarce locations by 5 percent by 2025 and 10 percent by 2030.</p> <p>The Entity communicates to the various stakeholders its performance and strategic actions for improvement regarding the management of water resources.</p> <p>https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
7.2b Water management (monitoring)	Conformance	<p>The Entity has a management and monitoring plan for water use.</p> <p>As published in the sustainability report the entity's performance on water resources management is communicated to the various stakeholders.</p> <p>https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity in the sustainability report presents its environmental performance regarding water withdrawal and use and discloses the related material risks and its improvement actions in water resources management.</p> <p>https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity has developed a Biodiversity Management Plan that includes the evaluation of risks and the materiality of the impacts to Biodiversity related to the activities and land use in its Area of Influence.</p> <p>The Entity has implemented a Biodiversity Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy</p> <p>The Entity presents its performance and actions on Biodiversity in the Sustainability Report:</p>

CRITERION	RATING	COMMENT
		https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>The Entity has developed a Biodiversity Management Plan. The Entity has a Biodiversity policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy</p> <p>The Entity presents its performance and actions on Biodiversity in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The Entity has developed a Biodiversity Management Plan that considers the Biodiversity Mitigation Hierarchy approach to avoid, minimise, rehabilitate or compensate Biodiversity impacts. The Entity has a Biodiversity policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy</p> <p>The Entity presents its performance and actions on Biodiversity in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
8.2c Biodiversity management (reporting)	Conformance	<p>The Entity has developed and publicly communicated the Biodiversity outcomes in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
8.3 Alien Species	Conformance	<p>The Entity has an inventory of invasive plant and animal species. The Biodiversity Management Plan includes specific technical assessments on the introduction of alien and invasive species. The Entity has periodically reported results of the monitoring of the fauna and flora, including exotic and/or invasive species to the regulatory environmental agency.</p>
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.

CRITERION	RATING	COMMENT
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity has a Human Rights Policy published and a Policy dedicated to the rights of Indigenous Peoples available to Stakeholders: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/indigenous-peoples-policy/Indigenous-Peoples-Policy-English.pdf</p> <p>The Sustainability Report describes the Entity's actions on Due Diligence regarding Human Rights: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has defined a Human Rights Due Diligence process, demonstrating the identification, prevention and mitigation of actual and potential impacts on Human Rights. The Human Rights Policy is published and available to Stakeholders: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>The Sustainability Report describes the Entity's actions on Due Diligence regarding Human Rights: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity has defined a Due Diligence process for Human Rights, demonstrating the identification, prevention, and mitigation of actual and potential impact on Human Rights and has defined the procedure for communication and consultation on remediation actions and controls. The Human Rights Policy is published and available to Stakeholders: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>The Sustainability Report describes the Entity's actions on Due Diligence regarding Human Rights: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
9.2 Women's Rights	Conformance	<p>The Entity has implemented policies on Human Rights and Equal Employment Opportunity: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p>

CRITERION	RATING	COMMENT
		<p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/equal-employment-opportunity/equal-employment-opportunity-policy-en.pdf</p> <p>The Sustainability Report details the Entity's actions on diversity, inclusion, and gender equity:</p> <p>https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
9.3 Indigenous Peoples	Conformance	<p>There are no Indigenous People in the region and there is no direct impact on Indigenous communities near the Entity. The Entity has implemented policies and processes to ensure respect for the rights and interests of Indigenous Peoples in accordance with international standards, including the International Labour Organisation (ILO) Convention C169 and the UN Declaration on the Rights of Indigenous Peoples. The Entity's Human Rights Policy is available to Stakeholders:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>The Entity's Indigenous Peoples Policy is available to Stakeholders:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/indigenous-peoples-policy/Indigenous-Peoples-Policy-English.pdf</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>There are no Indigenous People in the region and there is no direct impact on Indigenous communities near the Entity. The Entity's Human Rights Policy is available to Stakeholders:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>The Entity has an Indigenous Peoples Policy available to Stakeholders:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/indigenous-peoples-policy/Indigenous-Peoples-Policy-English.pdf</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has implemented procedures for the identification of sacred and/or cultural heritage sites and values within the Entity's Area of Influence. According to its operating licence, the Entity implements the technical requirement for the communication and mandatory preservation of identified archaeological sites in its Area of Influence.</p>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity has not relocated communities and does not plan any relocation in the future. If relocation is</p>

CRITERION	RATING	COMMENT
		necessary, the appropriate measures will be defined and communicated to the local authorities.
9.6b Resettlements (where unavoidable)	Conformance	The Entity has not relocated communities and does not plan any relocation in the future. If relocation is necessary, the measures are defined in the Operation License.
9.7a Local Communities (rights and interests)	Conformance	The Entity has defined documented policies and procedures to identify and assess the legal and customary rights of Local Communities. The Human Rights Due Diligence process identified impacts to the lands and livelihoods of Stakeholders.
9.7b Local Communities (impacts)	Conformance	The Entity has conducted a risk assessment to include the impacts of Resettlement and/or displacement on Local Communities. Action plans and controls have been developed and implemented to prevent and mitigate adverse impacts on the livelihoods of Local Communities. The Sustainability Report describes the Entity's action taken: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
9.7c Local Communities (livelihoods)	Conformance	The Entity has engaged with Local Communities regarding the development of actions and plans to prevent and/or mitigate adverse impacts on their livelihoods.
9.8 Conflict-Affected and High-Risk Areas	Conformance	In accordance with its Human Rights Policy, the Entity does not contribute to armed conflicts or Human Rights abuses. The Entity is located in an area that may be characterised as being in a conflict affected setting, as defined by the International Alert report 'Human rights due diligence in conflict-affected settings, 2018'. The Entity has standards for its supply chain clearly defining rules and the expectations for suppliers, contractors, and others with whom they do business. The Entity implements a supplier evaluation and qualification process.
9.9 Security practice	Conformance	The Entity has a private security process that respects the national laws of Federal Policy and Human Rights in line with recognised standards.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has a Human Rights Policy which describes the commitment to respecting Workers' freedom to join Labour Unions and Associations:

CRITERION	RATING	COMMENT
		https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy The Entity's Sustainability Report describes the scope of the Union's action: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects Workers' rights to Collective Bargaining and their participation in any collective bargaining process and has a Human Right Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy . The Entity's Sustainability Report describes the scope of the Union's action: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as local legislation does not restrict the right to Freedom of Association and Collective Bargaining, thus not requiring alternative means of Association for Workers
10.2a Child Labour (minimum age)	Conformance	The Entity does not use or support the use of Child Labour and only employs Workers over the legal minimum age and in accordance with its Code of Conduct: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct The Entity only employs Workers over 18 years, as described in the Human Rights Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy
10.2b Child Labour (hazardous)	Conformance	The Entity does not use or support the use of Child Labour and only employs Workers over 18 years.
10.2c Child Labour (worst forms)	Conformance	The Entity does not use or support the use of Child Labour and only employs Workers over 18 years.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not use or support the use of Forced Labour, slave labour or Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to lodge deposits or security payments at any time. The Entity complies with the requirements for hiring Workers as

CRITERION	RATING	COMMENT
		<p>defined in its Code of Conduct and Human Rights Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</p>
10.3d Forced Labour (debt bondage)	Conformance	The Entity complies with its Human Rights Policy and Code of Conduct and does not support Forced Labour including holding Workers in Debt Bondage or forcing them to work to pay off debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity complies with its Human Rights Policy and Code of Conduct and does not support Forced Labour and does not unreasonably restrict the freedom of movement of Workers in the workplace or in on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not keep the original documents of employees, according to interviews and verification records of Workers. The Entity does not use agencies to hire employees.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not engage in or support the use of Forced Labour, including denying Workers the freedom to terminate their employment.
10.4 Non-Discrimination	Conformance	<p>The Entity ensures gender equality and does not allow Discrimination. For further information refer to the following website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp</p>
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or harassment.
10.6 Disciplinary practices	Conformance	<p>The Entity ensures open communication with Workers and on the working conditions and there is no threat of retaliation, intimidation, harassment and no deduction of wages used as disciplinary practices. The Entity implements the Code of Conduct: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct The Entity has a Human Rights Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</p>

CRITERION	RATING	COMMENT
10.7a Remuneration (living wage)	Conformance	The Entity has a Remuneration Policy that ensures Workers receive adequate remuneration paid as a monthly salary.
10.7b Remuneration (method of payment)	Conformance	The Entity pays salaries monthly as defined by local legislation.
10.8 Working Time	Conformance	The Entity complies with local legislation regarding Working Time, including Overtime, holidays and paid annual leave.

PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has defined and communicated the Occupational Health and Safety Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-EN.pdf The Entity has an Occupational Health and Safety (OH&S) Management System certified to ISO 45001:2018.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has defined and communicated the Occupational Health and Safety Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-EN.pdf The Policy is available to visitors and internal service providers.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has defined and communicated the Occupational Health and Safety Policy which includes a commitment to comply with Applicable Law.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has defined and communicated its Occupational Health and Safety (OH&S) Policy. The OH&S Policies and procedures include the right of Workers to understand hazards and safe practices and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has defined and communicated the Occupational Health and Safety (OH&S) Policy and has appropriate procedures to sustain its OH&S Management System: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-EN.pdf The Entity's OH&S Management System is certified to ISO 45001:2018.

CRITERION	RATING	COMMENT
11.3 Employee engagement on health and safety	Conformance	The Entity has various engagement initiatives for its safety programs, such as the 'Autonomous Groups', an internal commission for the prevention of mining accidents.
11.4 OH&S performance	Conformance	The Entity has tools for the evaluation and continuous improvement of its Occupational Health and Safety performance.

Document Control and Version History

Revision	Date	Notes
0	18 July 2019	Initial Certification Audit – Full Certification
1	7 July 2022	Re-Certification Audit – Full Certification