
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOA SAN CIPRIÁN SMELTER

CERTIFICATE
NUMBER

39

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
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.

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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

Alcoa San Ciprián Smelting (Spain), including baking
furnace and administrative facilities.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa San Ciprián Smelter
CERTIFICATION SCOPE	Alcoa San Ciprián Smelting (Spain), including baking furnace and administrative facilities.
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 (6 – 10 May 2019)Re-Certification Audit (23 – 26 May 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">6 – 10 May 2019 (Certification Audit)23 – 26 May 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">2 July 2019 (Certification Audit)1 July 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (6 – 10 May 2019)</u> Alcoa San Ciprián Smelting, including baking furnace and administrative Facilities.</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><u>Re-Certification Audit (23 – 26 May 2022)</u> Alcoa San Ciprián Smelting, including baking furnace and administrative Facilities.</p>

Supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Casthouses

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

18 July 2022 – 17 July 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

17 July 2025

CERTIFICATE
NUMBER

39

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a system to ensure legal compliance with defined Policies and procedures to ensure risk identification and compliance with applicable legislation. The Policy is available at: https://www.alcoa.com/spain/es/pdf/Politica-de-Calidad-Aluminio.pdf
1.2 Anti-Corruption	Conformance	The Entity has defined Policies and procedures to identify and manage risks against Corruption in all its forms, including Extortion and Bribery, in accordance with Applicable Laws and international standards. The Anti-Corruption Policy is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption.asp
1.3 Code of Conduct	Conformance	The Entity has a Code of Conduct covering all key aspects of the business, business activities, conflicts of interest, customer and supplier relations and Human Rights compliance has been defined and communicated to all Stakeholders. The Code of Conduct is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established a Policy consistent with the environmental, social and governance (ESG) practices included in the ASI Performance Standard. The Entity has ISO 14001 and ISO 45001 certification. The Alcoa Corporate Policies and documents related to ESG aspects are available at: https://www.alcoa.com/sustainability/en/environment-health-safety.asp https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management supports the environmental, social and governance Policies through the provision of resources and periodic reviews.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates internally and externally its environmental, social and governance Policies.

CRITERION	RATING	COMMENT
		<p>The Alcoa Corporate Policies are communicated via the Alcoa website:</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/human-rights-policy.asp</p>
2.2 Leadership	Conformance	The Entity has nominated senior Management Representatives as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has a social responsibility Management System that involves and promotes the participation of internal and external Stakeholders.
2.4 Responsible Sourcing	Conformance	<p>The Entity has a responsible sourcing programme as part of its procurement process. The programme identifies and monitors suppliers, promoting improvement action plans when high-risk levels are identified. The Entity integrates environmental, health and safety assessment criteria into its supplier selection process. The Policies are available at:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp</p>
2.5 Impact Assessments	Conformance	The Entity has conducted Impact Assessments, including assessments of Human Rights and environmental and social impacts. There have been no New Projects or important changes since the Entity joined ASI.
2.6 Emergency Response Plan	Conformance	<p>The Entity has valid ISO 14001:2015 and ISO 45001 certificates. The Entity has developed and implemented Emergency Response Plans, including the participation of internal and external Stakeholders. The Plans are regularly tested through drills in coordination with external agencies, suppliers, and subcontractors. The Emergency Response Plans are available at:</p> <p>https://ficheiros-web.xunta.gal/emexencias/plans/PEE_SanCibrao_gal.pdf</p>
2.7 Mergers and Acquisitions	Conformance	Alcoa Corporate has adequate procedures and resources for mergers and acquisitions (M&A) that

CRITERION	RATING	COMMENT
		address environmental, social and governance issues in its Due Diligence process.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has an asset management procedure and policy which covers the entire Facility life cycle, including planning for the end of life. The Entity reviews relevant environmental, social and governance issues in the planning process for closure, decommissioning, and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The annual Alcoa Sustainability Report, prepared in accordance with Global Reporting Initiative (GRI) Guidelines, is publicly available: https://www.alcoa.com/sustainability/en/flipbook/index.html
3.2 Non-compliance and liabilities	Conformance	The Entity has not received significant fines, judgments, penalties, or non-monetary sanctions for non-compliance. The Entity has procedures to report non-compliances internally and publicly in Annual and Quarterly Reports: http://investors.alcoa.com/sec-filings
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has policies and processes to ensure payments to governments are in accordance with applicable legal requirements.
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 mechanisms to receive complaints, claims and requests from Stakeholders, including via the contact section on the website and the integrity line: https://www.alcoa.com/global/en/contact https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line The Entity's certified ISO 14001 and ISO 45001 Management Systems cover the management of complaints, claims and requests for information from Stakeholders.
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 and developed a Life Cycle Assessment (LCA) which includes the impacts from the raw material supply, transportation to the manufacturer and manufacturing stages.

CRITERION	RATING	COMMENT
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity provides cradle-to-gate LCA information on its Aluminium Products. The LCAs are available upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has published information related to its environmental impacts on the website: https://www.alcoa.com/global/en/what-we-do/aluminum/smelting/default.asp
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has an Aluminium Process Scrap recycling plan and controls to minimise scrap generation are in place. Scrap is 100% recycled, minus the process Slag.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has a waste management system that separates Aluminium alloys and grades for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented a recycling strategy that includes specific timelines, activities and targets for the collection and recycling of End of Life products. The strategy includes the objective to increase recycling on an ongoing basis.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has the relevant licence to facilitate a closed-loop process with customers and other external agents to return Aluminium scrap, non-ferrous metal filings and anode fragments from its operations to be reused.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity discloses Greenhouse Gas (GHG) emissions and energy use data in the Annual Declaration to the authorities: https://www.miteco.gob.es/es/cambio-climatico/temas/comercio-de-derechos-de-emision The Entity has published GHG emissions and energy use by source in the annual Sustainability Report: https://www.alcoa.com/sustainability/en/flipbook/index.html A GHG emissions verification statement is included in the Sustainability Report.
5.2 GHG emissions reductions	Conformance	The Entity has established systems for setting GHG emissions reduction targets and implementing action plans to achieve the targets.

CRITERION	RATING	COMMENT
		<p>GHG and energy data are reported to Alcoa Corporate on a monthly basis.</p> <p>The Entity's targets align with those defined at Alcoa Corporate level and published in the Sustainability Report, page 126: https://www.alcoa.com/sustainability/en/flipbook/126/index.html</p>
5.3a Aluminium Smelting (management system)	Conformance	The Entity has an ISO 14001 certified Management System, which covers aspects related to GHG Emissions and controls. Emissions are monitored and reported as part of the monthly environmental report. The Alcoa management team is updated on the status of GHG Emissions through review meetings. At the operational level, GHG Emissions are measured and monitored by the operational departments.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity is an Aluminium Smelter that was in production prior to 2020 and emissions are below 8 tonnes CO ₂ -eq per metric tonne of Aluminium.
5.3c Aluminium Smelting (after 2020)	Not Applicable	Not applicable. There are no plans for starting new smelters in the near future.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>The Entity has procedures and a methodology to determine its emission sources. Emissions sampling is performed by an external company. The Entity has an emissions permit and complies with the limits set by the authorities. The Entity continuously reports its Emissions to Air: https://www.meteogalicia.gal/Caire/datos.action?request_locale=es</p>
6.2 Discharges to Water	Conformance	The Entity has implemented an Environmental Management System in accordance with ISO 14001 and has implemented a procedure for the Control of Potential Contamination in Soil and Groundwater. The Entity has quantified and reported on Discharges to Water. The Entity has identified its water and wastewater flows.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has procedures for the prevention and control of Spills and the management of environmental risks and incidents. The Entity has conducted a risk analysis of operations in which Spills and Leakage may contaminate the air, water and/or soil.

CRITERION	RATING	COMMENT
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has procedures for the prevention and control of Spills and the management of environmental risks and incidents.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has adequate systems for immediate notification and disclosure of major Spills. The Entity has implemented a Spill reporting procedure that includes spill volume and potential contamination.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has a system to record Spills and provides appropriate information to the agencies involved in accordance with legal and permit notification requirements. The Entity publishes Spills in its Sustainability Report, page 149: https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a strategy according to the Waste Mitigation Hierarchy. The Entity has a Non-Hazardous and Hazardous Waste minimisation plan and a Waste report that is submitted to the relevant authorities. All Waste types in tanks and containers are accumulated, stored, labelled, inspected, and permitted/licensed/authorized as required or according to best management practices.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has published its inventory of Hazardous and Non-Hazardous Waste generated and associated Waste disposal methods in the Sustainability Report, page 144: https://www.alcoa.com/sustainability/en/flipbook/144/index.html The Entity reports its site-specific Waste management results annually to the authorities.
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.

CRITERION	RATING	COMMENT
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)	Conformance	The Entity stores Spent Pot Lining (SPL) in a dedicated warehouse that complies with legal requirements. There has been no spillage of untreated or treated SPL. There is no stockpiling of SPL.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity sends 100% of the SPL to an external and authorised recycler to optimise the recovery of any carbon and refractory material.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	There's no untreated Spent Pot Lining landfill in Alcoa San Ciprián.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	There's no treated Spent Pot Lining being landfilled and/or stockpiled of Spent Pot Lining in Alcoa San Ciprián.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	There's no discharge of Spent Pot Lining to marine or aquatic environments in Alcoa San Ciprián.
6.8a Dross (recovery)	Conformance	The Dross produced is sent to an authorised external company to maximise the recovery of Aluminium from Dross and Dross residue. 100% of the Dross sent is recycled and recovered.
6.8b Dross (recycling)	Conformance	The Dross produced is sent to an authorised external company to maximise the recovery of Aluminium from Dross and Dross residue. 100% of the Dross sent is recycled and recovered.
6.8c Dross (review of alternatives)	Not Applicable	There's no landfilling of Dross residues in Alcoa San Ciprián.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified its water input and output flows, sources, and destination. The Entity maintains maps of its water streams. The Entity holds a valid ISO 14001 certificate.
7.1b Water assessment (risk assessment)	Conformance	The Entity's water assessment covered the Entity's Area of Influence and concluded that the Entity is not located within a water risk area.
7.2a Water management (management plans)	Conformance	The Entity's water assessment determined there were no material risks. However, the Entity has a Water Management Policy, where it has established a programme of measures to improve water use efficiency, following the Alcoa Corporate

CRITERION	RATING	COMMENT
		strategic objective to reduce the intensity of total water use in water-scarce locations by 5% by 2025 and 10% by 2030.
7.2b Water management (monitoring)	Conformance	The Entity's water assessment determined there were no material risks. However, the Entity monitors water consumption and quality and has defined a strategy of water consumption reduction, aligned with the Alcoa Corporate sustainability strategy. The effectiveness of the water management plan is monitored by internal water consumption controls, monitoring meetings and verifications by external agencies.
7.3 Disclosure of water usage and risks	Conformance	The Entity discloses its water use to the local municipality and authorities in an annual declaration. The Entity has published data on water abstraction and consumption, and its water-related risks in the Sustainability Report: https://www.alcoa.com/sustainability/en/flipbook/152/index.html
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted a Biodiversity study in accordance with the Biodiversity Mitigation Hierarchy and identified the main risks and impacts on biodiversity, including its defined Area of Influence.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity's Biodiversity study has defined objectives and an action plan. The Entity monitors the effectiveness of the Biodiversity Action Plan through Key Performance Indicators (KPIs) and the follow-up of planned actions.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity's Biodiversity study was informed in consultation with external and internal Stakeholders and identifies risks and impacts. The study uses the protection figures defined by current legislation and correlates them with the High Conservation Values (HCV) methodology.
8.2c Biodiversity management (reporting)	Conformance	The Entity monitors the effectiveness of the Biodiversity Action Plan through Key Performance Indicators (KPIs). Follow-up of planned actions and progress are communicated to Stakeholders. Relevant actions are analysed and communicated in the Alcoa Foundation Annual Report and on the website: https://www.alcoa.com/foundation/en https://www.alcoa.com/spain/es/community

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8.3 Alien Species	Conformance	The Entity monitors the effectiveness of the Biodiversity Action Plan through KPIs and the follow-up of planned actions, including actions for the elimination and non-proliferation of Alien Species and protection of native species. Relevant actions are analysed and communicated in the Alcoa Foundation Annual Report and on the website: https://www.alcoa.com/foundation/en https://www.alcoa.com/spain/es/community
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)	Conformance	The Entity has a Human Rights Policy covering Child Labour, freedom of engagement, equal opportunity, compensation, Freedom of Association, and relationships with Indigenous Peoples. It is aligned with the United Nations (UN) Guiding Principles on Business and Human Rights. The Human Rights Policy is available at: 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/pdf/human-rights-policy/human-rights-policy-es.pdf The Entity has a Code of Conduct that includes Human Rights compliance issues: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct
9.1b Human Rights Due Diligence (process)	Conformance	Alcoa Corporate has implemented a Human Rights compliance assessment process following the model established by the Danish Institute for Human Rights. The results of the assessment are published in the Sustainability Report, page 74: https://www.alcoa.com/sustainability/en/flipbook/74/index.html

CRITERION	RATING	COMMENT
		<p>The Entity's Due Diligence process is consistent with corporate guidelines and the Entity has a Human Rights risk assessment tool and has developed an associated action plan. The results of the action plan are published in the annual report of the non-financial information statement, which concludes there are no Human Rights risks.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity's Due Diligence process is consistent with corporate guidelines and the Entity has a Human Rights risk assessment tool and has developed an associated action plan. The results of the action plan are published in the annual report of the non-financial information statement, which concludes there are no Human Rights risks.</p>
9.2 Women's Rights	Conformance	<p>The Entity has an Equal Employment Opportunity Policy which includes a commitment that employees, contractors, and applicants should not be discriminated against based on gender: https://www.alcoa.com/global/en/careers/pdf/Alcoa-EEO.pdf</p> <p>The Entity has a Code of Conduct that sets out a commitment to combat harassment of women. https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p> <p>The Entity has a Collective Bargaining Agreement that sets out the conditions for effective equality between people, including women's rights. The Entity has an equality plan that includes an ordered set of measures aimed to achieve equal treatment and opportunities between women and men and eliminate Discrimination based on sex.</p>
9.3 Indigenous Peoples	Not Applicable	<p>There are no qualified people as indigenous in the Area of Influence of Alcoa San Ciprián.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	<p>There are no people considered indigenous in the Area of Influence of Alcoa San Ciprián.</p>
9.5 Cultural and sacred heritage	Not Applicable	<p>There are no places classified as cultural or sacred in location or vicinity where Alcoa San Ciprián operates. Nor were there at the time of construction of the plant in the 70s. Alcoa San Ciprián has as its area of influence the coast of Galicia, between the municipalities of Cervo and Xove. Geographically, the municipalities of Xove and Cervo are located north of the province of Lugo, also north of Galicia, within the area known as the Mariña Lucense.</p>

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9.6a Resettlements (avoid or minimise)	Not Applicable	There have been no projects or activities by the Entity that required resettlement.
9.6b Resettlements (where unavoidable)	Not Applicable	No projects have been carried out that include displacement, resettlement or land acquisition.
9.7a Local Communities (rights and interests)	Conformance	Alcoa Corporate has a Stakeholder Engagement Process to ensure positive Stakeholder relationships and effective means for resolving Community concerns. The Entity has implemented the corporate requirements and has developed an annual Stakeholder Engagement Plan. The Entity's commitment to meeting the rights and interests of Local Communities is further included in the Human Rights Policy and Code of Conduct.
9.7b Local Communities (impacts)	Conformance	The Entity has implemented a Stakeholder Engagement Process to ensure positive Stakeholder relationships and effective means for resolving Community concerns. The Entity has a complaints handling procedure to receive complaints from external bodies, including the Local Community, and there have been no complaints received.
9.7c Local Communities (livelihoods)	Conformance	The Entity has explored opportunities with the Local Communities to respect and support their livelihoods. Numerous social and environmental actions and projects were delivered by the Entity to support the livelihoods of Local Communities, with Stakeholders providing a positive evaluation.
9.8 Conflict-Affected and High-Risk Areas	Conformance	It was evidenced, in alignment with the Human Rights Policy and Human Rights Program, that the Entity does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity maintains a contract with a specialised security company, in accordance with the Alcoa Corporate standards and Spanish legislation. The Entity has adequate procedures for compliance with Human Rights, including monitoring of security activities.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has a Works Council made up of internal members and trade union delegates. Trade union elections are held in accordance with applicable legislation and Workers can and have the right to

CRITERION	RATING	COMMENT
		freely associate with trade unions and vote in elections.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has a Collective Bargaining Agreement which is negotiated and agreed upon with the Works Council. The current agreement is effective from 1 January 2020 to 31 December 2025.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	In Spain there is no legislation that restricts the right to freedom of association and collective bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented the corporate Human Rights Policy and does not employ Workers under 18 years of age: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy The Entity does not support the use of Child Labour in the supply chain and implements general conditions of procurement and the Code of Conduct: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct
10.2b Child Labour (hazardous)	Conformance	The Entity's Corporate Human Rights Policy prohibits the use of Child Labour and the Environmental, Health and Safety Policy requires employees to work safely. The Entity does not support the use of Child Labour in the supply chain and implements general conditions of procurement and the Code of Conduct.
10.2c Child Labour (worst forms)	Conformance	The Entity's Corporate Human Rights Policy prohibits the use of Child Labour and the Environmental, Health and Safety Policy requires employees to work safely. The Entity does not support the use of Child Labour in the supply chain and implements general conditions of procurement and the Code of Conduct.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has implemented a Corporate Human Rights Policy that prohibits Forced Labour and Human Trafficking: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy The Entity locally complies with all corporate Policies on Human Rights and has a process in place to ensure the monitoring and follow-up of compliance with the Human Rights Policy, Code of Conduct and the general purchasing conditions by its suppliers and subcontractors.

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10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity's Human Rights Policy and Code of Conduct prohibit Forced Labour. The Entity does not require any deposits, Recruitment Fees or equipment advances from Workers directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to submit security deposits or payments at any time. All employees have the right to work in a respectful and safe environment and employees have trade union representation and are covered by the law and Collective Bargaining Agreement. All employees have legal contracts and are registered with social security.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold employees in Debt Bondage or force them to work to pay off a debt. In no case is any Worker obliged to pay any debt outside of what is defined in the Collective Bargaining Agreement.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not unreasonably restrict employees' freedom of movement in the workplace or on-site housing. Contractors working in the Entity have freedom of movement, according to the general conditions of procurement.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not unlawfully retain the documents of any employee. There are no policies or practices that require these documents to be retained for any purpose.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Employees are covered by the terms of the employment contract and are free to terminate their contract at any time. For the termination of employment, employees must follow the provisions of the employment contract and current Spanish legislation (Estatuto de los trabajadores Article 53).
10.4 Non-Discrimination	Conformance	The Entity has in its Collective Bargaining Agreement specific measures to ensure fairness at work. The Entity has a committee (Equality Commission) inclusive of trade union representatives, that holds regular meetings to review information on Discrimination and as a place to raise potential breaches of the Code of Conduct. The Entity reports its equality performance to the authorities in its non-financial reporting statement.
10.5 Communication and engagement	Conformance	The Entity has implemented relevant policies and has held frequent meetings established under the

CRITERION	RATING	COMMENT
		<p>Collective Bargaining Agreement to deal with any labour issues. Numerous committees have been established to ensure communication and engagement, including the Interpretation and Surveillance Committee, Training and Evaluation Committee, Sustainability Committee, Equality Committee and Social Care Committee. Employees can directly approach Human Resources or their union representatives to discuss any issues. The Entity has implemented spaces and systems to promote communication and engagement with employees.</p>
10.6 Disciplinary practices	Conformance	<p>The Entity has established policies and procedures on disciplinary practices in accordance with the Metal Sector Workplace Code of Conduct and in line with the Collective Bargaining Agreement. Sanctions or disciplinary measures are applied in accordance with the Collective Bargaining Agreement and Spanish law.</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity has a Collective Bargaining Agreement for staff Remuneration. Remuneration conditions exceed those established in the sectoral agreement (Metal Sector Agreement) and the minimum salary established in Spain.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity pays wages monthly. Workers receive documentation of their payroll receipt in accordance with the law.</p>
10.8 Working Time	Conformance	<p>The Entity has established through the Collective Bargaining Agreement, the number of annual working hours, rest hours, shift schedules and the legal limit of Overtime for each employee. The Entity has implemented processes to control working hours and ensure compliance with the Collective Bargaining Agreement and Spanish legislation.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has a certified ISO 45001 Occupational Health and Safety (OH&S) Management System inclusive of an Occupational Health and Safety Policy. The Policy is communicated to employees, subcontractors, and visitors. The Policy is periodically reviewed to ensure that it remains relevant and appropriate to the needs of the Entity. The Policy is available at:</p>

CRITERION	RATING	COMMENT
		https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-ES.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Occupational Health and Safety Policy are communicated to employees, subcontractors, and visitors via induction of new employees, communication boards at the plant and provision to subcontractors.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Occupational Health and Safety Policy include an explicit commitment to "Comply with all laws and establish levels for the Entity and its suppliers by which unacceptable risks are identified".
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The Entity's Health and Safety Policy includes an explicit commitment to "Value human life above all else and manage risks accordingly" and "Encourage employee involvement and promote employee awareness of Environmental, Health and Safety threats and opportunities".</p> <p>Employees, their representatives, and subcontractors understand the risks and their authority to refuse and stop any unsafe practice.</p>
11.2 OH&S Management System	Conformance	The Entity has a certified ISO 45001 Occupational Health and Safety (OH&S) Management System, which is audited internally and externally on an annual basis. The Entity has a Joint Prevention Service that includes senior occupational risk prevention technicians. The Entity has an emergency plan and conducts annual drills. The OH&S Management System includes various tools to assess the risks of its Workers and subcontractors, in addition to coordinating business activities.
11.3 Employee engagement on health and safety	Conformance	The Entity has a certified ISO 45001 Occupational Health and Safety (OH&S) Management System and has various committees and subcommittees for engagement on Occupational Health and Safety issues. All meetings are documented, and action plans are established. Workers can freely report risks through an internal platform which are tracked. The Entity has implemented and monitors specific indicators and targets for participation and commitment to health and safety by employees and subcontractors.

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	The Entity has established Occupational Health and Safety indicators and targets and monitors performance during weekly meetings with the Leadership Team. Annual targets are defined and included in the planning of preventive activities which are available to employee representatives. The lagging indicators are included in the annual report of the Joint Prevention Service which compares previous years to analyse the trend.

Document Control and Version History

Revision	Date	Notes
0	18 July 2019	Initial Certification Audit – Full Certification
1	25 July 2022	Surveillance Audit