
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOA MASSENA

CERTIFICATE
NUMBER

186

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

27 JULY 2022

DATE OF EXPIRY

26 JULY 2025

CERTIFIED SINCE

2 MARCH 2022

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
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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	<ul style="list-style-type: none">24 – 25 January 2022 (Initial Certification Audit)4 – 6 May 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">5 February 2022 (Initial Certification Audit)21 June 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 25 January 2022)</u></p> <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>

Surveillance Audit (4 – 6 May 2022)

The audit scope covered the Aluminum Smelting, Casthouse and administrative associated facilities at Alcoa Massena (USA).

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

27 July 2022 – 26 July 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

26 July 2025

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. A governance framework for Business Ethics and Compliance is established. Training is delivered to relevant personnel on a regular basis. A regulatory compliance audit is periodically performed by the Alcoa Corporate functions and the 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 takes necessary actions. There have been no Corruption cases found over recent years.
1.3 Code of Conduct	Conformance	The Entity has developed policies, standards, and relevant documents to communicate requirements related to the Alcoa Code of Conduct. Training is provided annually and during the new employee onboarding process to ensure proper understanding of the policies and standards. An Integrity Line has been established for reporting concerns related to conduct. Alcoa Corporate functions monitor concerns and take necessary actions.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented the Alcoa Corporate Policies and defined site level Policies, 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 the responsibility and authority to review the appropriateness of the Policies and oversee implementation. The Entity's site level EHS Policies are reviewed annually by the site management team. The Policies are communicated to all employees and contractors through training and on policy boards.

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has implemented the Alcoa Corporate Policies and defined site level Policies, 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 the responsibility and authority to review the appropriateness of the Policies and oversee implementation. The Entity's site level EHS Policies are reviewed annually by the site management team. The Policies are communicated to all employees and contractors through training and on policy boards.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has published the Alcoa Policies on the intranet and the site Policies are also communicated on policy boards. The distributed Weekly Safety Communication Update covers reminders for corporate initiatives and required training including the Policies. The Alcoa Corporate Policies and documents related to Environmental, Social and Governance (ESG) aspects are communicated via the Alcoa 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>
2.2 Leadership	Conformance	<p>The Entity's site EHS Manager has been assigned as the Management Representative for the implementation of the ASI Performance Standard. This role has been communicated internally to all employees.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has implemented an ISO 14001 and ISO 45001 aligned Environmental, Health and Safety (EHS) Management System, based on the Corporate EHS Management System Standard, which provides an overview of the Corporate Integrated EHS Management System and sets the minimum expectation for the Entity's EHS Management Systems. All the key elements of ISO 14001 have been properly implemented.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Alcoa Corporate Policies, Management System and standards regarding social management have been developed and implemented. An Alcoa Material</p>

CRITERION	RATING	COMMENT
		<p>Assessment was performed in 2020 to determine material issues at the global level.</p> <p>The Entity has conducted a self-assessment of the implementation of the Social Management System. The Entity also conducted a Stakeholder Engagement Dashboard Review in 2021.</p>
2.4 Responsible Sourcing	Conformance	<p>Alcoa Corporate has overall responsibility for responsible sourcing. The Supplier Sustainability Program, conducted in partnership with EcoVadis, defines the process for managing suppliers' sustainability and corporate social responsibility performance. The program communicates expectations through a Supplier Standards document, assesses suppliers (for in-scope suppliers), provides guidance to suppliers on improvement opportunities, and monitors suppliers for compliance and development of action plans if needed. Site buyers assist with the identification and management of suppliers in these programs.</p> <p>The Alcoa Supplier Standards are available: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier_Standards.pdf</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 and Safety Review (PEHSR) Form. The PEHSR Form is completed prior to the approval of a project and grant of project funding. A review of a recently completed PEHSR Form demonstrated its correct use for performing environmental, social, cultural and Human Rights Impact Assessments.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has developed an Emergency Response Action Plan (ERAP) as per the Alcoa Corporate standard. The Entity has an in-house fire brigade team consisting of 25 members. Training was provided to the emergency response team as per the training schedule. Local Fire Department officers are invited to the site to familiarise themselves with the site's emergency-related arrangements approximately every three years.</p>
2.7 Mergers and Acquisitions	Conformance	<p>Environmental, social and governance (ESG) issues are reviewed 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>

CRITERION	RATING	COMMENT
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 (ESG) issues are reviewed in the processes for closure, decommissioning, and divestment, as well as how to address individual liabilities at the relevant locations.</p> <p>The Entity follows the procedures instructed by Alcoa Corporate functions in such events.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The annual Alcoa Sustainability Report, prepared in line with GRI G4 Sustainability Reporting Guidelines, is publicly available: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p> <p>The Alcoa Annual Report and Proxy Statement are available on the 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, refer to page 108, Note S - Contingencies and Commitment: https://investors.alcoa.com/sec-filings/default.aspx</p> <p>The Entity holds regular Community Advisory Board Meetings to present information on governance, material environmental, social and economic impacts. 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. Payments to governments, including</p>

CRITERION	RATING	COMMENT
		<p>taxes or tributes are reported in the Alcoa Annual Report 2021, page 48: https://investors.alcoa.com/financials/annual-reports-and-proxy-statements/default.aspx</p> <p>The Entity's financial and business processes are audited by the Alcoa Corporate function and external party.</p>
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.</p> <p>The Complaint Tracker is used for documenting complaints or concerns with information on the responsible department and action plan. There were no complaints or concerns received in 2021.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Alcoa Corporate Life Cycle Assessment (LCA) procedure defines the requirements for conducting, reporting and sharing information related to LCA 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 for the Ecolum™ product. The Entity is one of Alcoa's sites manufacturing this product. 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: 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 Life Cycle Assessment (LCA) procedure defines the requirements for conducting, reporting and sharing information related to LCA

CRITERION	RATING	COMMENT
		<p>studies.</p> <p>An Environmental Product Declaration (EPD) was issued to Alcoa for the Ecolum™ product. The Entity is one of Alcoa's sites manufacturing this product. 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:</p> <p>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) was issued to Alcoa for the Ecolum™ product and is publicly available from the website of UL Environment:</p> <p>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)	Conformance	The Entity has established weekly and monthly monitoring and controls for the recovery rate of Billet, Rod, and Sow. The Entity also defined scrap collection and recycling mechanisms based on the properties of the scrap produced. 100% of scrap is recycled internally.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented a process for collecting, storing and using scraps based on scrap type. Training has been provided for the process. 100% of scrap is recycled internally, and weekly and monthly monitoring records for recovery rates are maintained.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has no control of the end-of-life of its products from the Casthouse. However, as a Member of The Recycling Partnership, the biggest Aluminum recycling organization in North America, Alcoa corporation is involved, engaged and supporting activities promoting collecting and recycling systems to increase recycling rates.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has no control of the end-of-life of its products from the Casthouse. However, as a Member of The Recycling Partnership, the biggest Aluminum recycling organisation in North America, Alcoa corporation is involved, engaged and supporting activities promoting collecting and recycling systems to increase recycling rates.

CRITERION	RATING	COMMENT
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity reports its GHG Emissions annually to the US EPA (United States Environmental Protection Agency) Greenhouse Gas (GHG) Reporting Program, using EPA's electronic 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 management to certify the reported information prior to 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 annual Sustainability Report. The Sustainability Report includes a third party assurance statement and is available from the company website, refer to pages 125-130, Climate Protection: https://www.alcoa.com/sustainability/en/pdf/2021</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity's GHG 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 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 annual Alcoa Sustainability Report 2021, overall GHG Emissions reduction targets are publicly disclosed, with strategic actions to achieve the reduction targets, refer to pages 125-130, Climate Protection: https://www.alcoa.com/sustainability/en/pdf/2021</p>
5.3a Aluminium Smelting (management system)	Conformance	<p>The Entity has implemented Standard Operating Procedures (SOPs) to incorporate requirements for operations, safety, and environment, including controls related to Direct GHG Emissions from the processes. The SOPs also define training requirements.</p>
5.3b Aluminium Smelting (up to and including 2020)	Conformance	<p>The Entity's GHG Emission intensity for 2020 was 2.21 tonnes of CO₂ equivalent per tonne of Aluminium and 2.30 tonnes of CO₂ equivalent per tonne of Aluminium for 2019.</p>

CRITERION	RATING	COMMENT
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	Conformance	<p>The Entity annually reports its emission inventory as required by the Air Permit issued by the New York State Department of Environmental Conservation (NYSDEC).</p> <p>The Entity is currently in non-attainment status for SO₂ (sulphur 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 2021, on pages 158-160, Air Emissions: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
6.2 Discharges to Water	Conformance	<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 the Massena Operations Water Management Plan to define requirements related to wastewater discharge. Alcoa's aggregated performance regarding water outputs is presented in the Sustainability Report 2021, on pages 151-156, Water: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</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 the 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</p>

CRITERION	RATING	COMMENT
		and monitoring, incident response and reporting, training, and record keeping.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	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.
6.4a Reporting of Spills (immediate disclosure)	Conformance	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.
6.4b Reporting of Spills (regular reporting)	Conformance	All reportable Spills (greater than five gallons or reach land or reach water) are entered into the Entity's online system and are consolidated in the Sustainability Report on pages 143-150, Waste and Spills: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed, implemented, and maintained a Waste Management Plan, which includes a waste strategy and minimisation 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. 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.
6.5b Waste management and reporting (disclosure)	Conformance	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. Alcoa publishes aggregated performance regarding

CRITERION	RATING	COMMENT
		waste generation in the Sustainability Report 2021, on pages 143-150, Waste and Spills: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
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)	Conformance	The Entity has developed, implemented and maintained a Spent Pot Lining (SPL) Management Plan to prevent the release of SPL into the environment. The plan covers containment building management, SPL management, SPL pollution prevention and management, including training, inspection, and records retention.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	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.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	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.
6.7d Spent Pot Lining (SPL) (review of alternatives)	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. Alcoa Corporate continually reviews alternative

CRITERION	RATING	COMMENT
		<p>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 the development of sustainable, next generation SPL management technologies. Alcoa also continues to focus on pot life extension hereby decreasing the number of pots relined per year.</p>
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	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>The Entity does not discharge any SPL to marine or aquatic environments.</p>
6.8a Dross (recovery)	Conformance	<p>The Entity is ISO 9001 certified for its activities at the Casthouse. One of its objectives is the recovery percentage within the Casthouse. Dross percentage is also monitored in the Entity's KPI - Process Data. Training and competency levels of operators are managed to maximise Dross and Dross residue treatment.</p> <p>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.</p>
6.8b Dross (recycling)	Conformance	<p>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.</p>
6.8c Dross (review of alternatives)	Conformance	<p>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.</p>
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	<p>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 the Entity's utility system.</p>

CRITERION	RATING	COMMENT
		<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 a Water Withdrawal Reporting Form to the 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)	Conformance	<p>The Massena Operations Water Management Plan determines risks related to water management and defines requirements regarding water management.</p>
7.2b Water management (monitoring)	Conformance	<p>The Massena Operations Water Management Plan defines requirements related to review and monitoring activities to confirm the effectiveness of water management plans.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Water Withdrawal Permit was transferred from another company to the Entity in September 2021. The Entity is required to annually submit a Water Withdrawal Reporting Form to the New York State Department of Environmental Conservation from 2022, with a due date of 31 March each year. Alcoa's aggregated water usage is presented in the Sustainability Report 2021, on pages 152-156, Water:</p> <p>https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<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 spreadsheet of Alcoa Massena Biodiversity Risk Assessment and Action Plan.</p>

CRITERION	RATING	COMMENT
8.2a Biodiversity management (biodiversity action plans)	Conformance	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 assessments and actions are detailed in the Alcoa Massena Biodiversity Risk Assessment and Action Plan.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	In the Alcoa Massena Biodiversity Action Plan Procedure, the Entity provides background information related to Biodiversity and defines approaches and requirements for 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 within the current operational phase.
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 Sustainability Report 2021, on pages 117-124, Biodiversity and Mine Rehabilitation: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
8.3 Alien Species	Conformance	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 the use of properly treated wood pallets.
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.

CRITERION	RATING	COMMENT
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	<p>The Entity complies with Alcoa's Human Rights Policy which defines the commitment to support the United Nations Guiding Principles for Business and Human Rights and the International Labour Organization Core Conventions. The Policy is available via the link: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</p> <p>The Policy is part of the Entity's employee and contractor onboarding training.</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has undertaken a Human Rights Impact Assessment based on a methodology developed by the Dutch Institute for Human Rights and published in the Human Rights Impact Assessment Guidance and Toolbox (2016). The self-assessment identified Rightsholders in the local context. External Stakeholders were consulted during the assessment through Massena Community Advisory Board Meeting. The assessment identified no gaps, and hence no actions were developed.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity has not caused or contributed to adverse Human Rights impacts. Alcoa has developed corporate procedures to address remediation processes where such a situation occurs.</p>
9.2 Women's Rights	Conformance	<p>The Entity implements the Alcoa Equal Employment Opportunity (EEO) Policy, which is made available through various approaches including job description and training, and on the Alcoa website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/equal-employment-opportunity</p> <p>The local Alcoa Women's Network group was active and met regularly to discuss ideas to educate and promote an inclusive environment. The Alcoa Sustainability Report 2021 provides further detail on the promotion of gender equity, refer pages 81-90, Our People: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
9.3 Indigenous Peoples	Conformance	<p>Alcoa has developed an Indigenous Peoples Statement and Indigenous Peoples Policy, available on the website:</p>

CRITERION	RATING	COMMENT
		<p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy</p> <p>The Entity recognises the presence of the nearby St. Regis Mohawk Tribe. The Entity, being a tenant of the land, and based on the lease agreement with the landowner, does its part to ensure its operations do not have an adverse effect on the tribal lands or people. The Entity communicates employment opportunities, grants opportunities and community surveys, when relevant. The Tribal council were also invited to the Entity's Massena Community Advisory Board meeting.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>The Entity is a long-term operation and does not involve a New Project or Major Change. Alcoa Corporate is committed to being responsible in dealing with Communities, including Indigenous Communities, and is developing a formal engagement approach aligned with the International Council on Mining and Metals (ICMM) Position Statement on Indigenous Peoples and Mining, which includes performing the Free, Prior, and Informed Consent (FPIC) where is required.</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity recognises the presence of the nearby St. Regis Mohawk Tribe. The Entity, being a tenant of the land, and based on the lease agreement with the landowner, does its part to ensure its operations do not have an adverse effect on the tribal lands or people, including sacred or cultural heritage sites. The Entity's regulatory permit requires a detailed impact assessment prior to any construction work, in which cultural and sacred heritage sites would be covered in the future.</p>
9.6a Resettlements (avoid or minimise)	Not Applicable	<p>This Criterion is not applicable as there are no projects where physical and/or economic displacements of people were required.</p>
9.6b Resettlements (where unavoidable)	Not Applicable	<p>This Criterion is not applicable as there are no projects where physical and/or economic displacements of people were required or relevant.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>Alcoa Corporate has a Stakeholder engagement process that all locations are required to follow to ensure positive Stakeholder relationships and effective means for resolving Community concerns. Annually, locations must complete a Dashboard to indicate adherence to the plan and complete an annual Stakeholder Engagement Plan. The Entity prepares a Stakeholder Engagement Plan</p>

CRITERION	RATING	COMMENT
		<p>annually, which includes community outreach and communication. The Entity collaborates with Stakeholders on grant projects using Alcoa Foundation funding to enhance and support the Community. The Entity completes a dashboard to indicate adherence to the Stakeholder Engagement Plan at the end of each year.</p>
9.7b Local Communities (impacts)	Conformance	<p>Alcoa Corporate has a Stakeholder engagement process that all locations are required to follow to ensure positive Stakeholder relationships and effective means for resolving Community concerns. Annually, locations must complete a Dashboard to indicate adherence to the plan and complete an annual Stakeholder Engagement Plan. The Entity prepares a Stakeholder Engagement Plan annually, which includes community outreach and communication. This plan includes Community Advisory Board meetings, which allow Stakeholders from the Community to communicate any issues. The Entity has a complaint process in which external Stakeholders can file a complaint or concern.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity drafts an annual Stakeholder Engagement Plan which includes community outreach and communication. The Entity collaborates with Stakeholders on grant projects using Alcoa Foundation funding to enhance and support the Community. The Entity's employees regularly participate in volunteer activities to benefit local organisations and schools. All external Stakeholders interviewed recognise The Entity's contribution to the local economy, environmental improvement (tree planting), and support to various community activities.</p>
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	<p>The Entity is located in the USA, a country where armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas is not relevant. At a corporate level, Alcoa implemented a supply chain Due Diligence programme to further manage risk from the supply chain related to the areas of anti-Bribery and Corruption, trade compliance, child and slave labour, criminal history, human trafficking, and conflict minerals.</p>
9.9 Security practice	Conformance	<p>The Entity has contracted New York State licensed security officers. They are contractually obliged to follow Alcoa Security Standards and expectations. Permissions are granted by this security for visitors and contractors to access the site. Security officers</p>

CRITERION	RATING	COMMENT
		cannot use physical force. Training records on the Alcoa Code of Conduct and the expectation to respect Human Rights when carrying out security tasks have been maintained.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The majority of the Entity's employees are unionised under an active Collective Bargaining agreement. The most recent agreement was put into effect in September 2019. The Employee Rights Under the National Labor Relations Act Policy is posted on all plant policy boards and reviewed with all employees during onboarding.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The majority of the Entity's employees are unionised under an active Collective Bargaining agreement. The most recent agreement was put into effect in September 2019. The Employee Rights Under the National Labor Relations Act Policy is posted on all plant policy boards and reviewed with all employees during onboarding.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as USA laws allow the Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Alcoa Code of Conduct prohibits the use of Child Labour, and the Entity does not allow the employment of individuals under 18 years of age, as per the New York State law which stipulates individuals cannot work in a hazardous facility until 18 years. An individual's age, identity and citizenship are verified by the US Department of Homeland Security during onboarding through the e-verify process.
10.2b Child Labour (hazardous)	Conformance	The Alcoa Code of Conduct prohibits the use of Child Labour, and the Entity does not allow the employment of individuals under 18 years of age, as per the New York State law which stipulates individuals cannot work in a hazardous facility until 18 years. An individual's age, identity and citizenship are verified by the US Department of Homeland Security during onboarding through the e-verify process.
10.2c Child Labour (worst forms)	Conformance	The Alcoa Code of Conduct prohibits the use of Child Labour, and the Entity does not allow the employment of individuals under 18 years of age, as per the New York State law which stipulates individuals cannot work in a hazardous facility until

CRITERION	RATING	COMMENT
		18 years. An individual's age, identity and citizenship are verified by the US Department of Homeland Security during onboarding through the e-verify process.
10.3a Forced Labour (human trafficking)	Conformance	The Entity complies with the Alcoa Human Rights Policy and Code of Conduct and does not use or support the use of Forced Labour, slave labour or Human Trafficking. An individual's age, identity and citizenship are verified by the US Department of Homeland Security during onboarding through the e-verify process. There were no issues of Human Trafficking identified at the Entity during the review of Human Resources records or interviews with employees and stakeholders.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity complies with the Alcoa Human Rights Policy and Code of Conduct and does not support Forced Labour including requiring any form of deposit, Recruitment Fee or equipment advance from Workers either directly or through employment or recruitment agencies. There were no issues related to deposits, fees or advances identified at the Entity during the audit.
10.3c Forced Labour (migrant workers)	Conformance	The Entity complies with the Alcoa Human Rights Policy and Code of Conduct and does not support Forced Labour including requiring Migrant Workers to lodge deposits or security payments at any time. There were no Migrant Workers identified at the Entity during the audit.
10.3d Forced Labour (debt bondage)	Conformance	The Entity complies with the Alcoa 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 a debt. There were no issues related to Debt Bondage identified at the Entity during the audit.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity complies with the Alcoa Human Rights Policy and Code of Conduct, which supports the freedom of movement of all employees.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity complies with the Alcoa Human Rights Policy and Code of Conduct, which does not allow the retention of identity papers, permits, or certificates of any employee.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity complies with the Alcoa Human Rights Policy and Code of Conduct to allow employees to freely terminate their employment.

CRITERION	RATING	COMMENT
10.4 Non-Discrimination	Conformance	<p>The Entity implements the Alcoa Equal Employment Opportunity Policy which prohibits all types of Discrimination. A process for the reporting and investigation of allegations of Discrimination, outlined in the Discrimination, Harassment and Bullying Free Workplace Policy, is implemented.</p> <p>Alcoa has engagement practices for and to support diversity groups such as AWN (Alcoa Woman Network) and EAGLE (Employees at Alcoa for Gay, Lesbian, Bisexual and Transgender Equality), and the Code of Conduct ensures this practice. During the hiring process, there is a team of individuals that each perform a portion of the process, and the choice to hire is made jointly to avoid Discrimination. There were no issues related to Discrimination identified during the employee interviews.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented a grievance process under the applicable labour agreements to resolve various disputes. The Entity has established a structure to ensure open communication and direct engagement with Workers regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.</p>
10.6 Disciplinary practices	Conformance	<p>The Entity has implemented the Alcoa Corporate Code of Conduct relating to disciplinary practice which complies with international and best practice in this subject. The Entity's disciplinary policy is reflected in the Agreement and Working Rules. Employee Disciplinary Records are maintained. There were no issues related to disciplinary practices identified during the employee interviews.</p>
10.7a Remuneration (living wage)	Conformance	<p>The wages for unionised employees are negotiated and there is a process for determining fair and competitive wages for non-union employees. Salary employees are paid based on the market and consideration of internal salaries at the Entity. There were no issues identified during the review of the payroll system and employee interviews.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity provides the payment of wages in accordance with the direction of the Agreement and Working Rules for unionised employees. All other Workers are paid timely, in accordance with New York State law. There were no issues identified during the review of the payroll system and employee interviews.</p>

CRITERION	RATING	COMMENT
10.8 Working Time	Conformance	The Entity has implemented the Alcoa Corporate guidelines regarding Working Time (including Overtime working hours), public holidays and paid annual leave, which requires following the applicable local laws in determining working time and holidays. The Entity also follows the direction outlined in the Agreement and Working Rules for unionised employees.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	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.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	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.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	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". The relevant requirements are also reflected in the Entity's standard operating procedures. Training has been provided to all employees regarding the procedure requirements. Regular inspections were conducted to ensure compliance with the procedures.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	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". Interviews, training records and document review confirmed the communication, understanding and effective implementation of the right to stop unsafe work.
11.2 OH&S Management System	Conformance	The Alcoa Corporate Environmental, Health and Safety (EHS) 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. The process for hazard identification, risk assessment, and risk controls related to Occupational Health and Safety are implemented,

CRITERION	RATING	COMMENT
		including task observation, safety walk, daily meeting, Safety Committee meeting, and training.
11.3 Employee engagement on health and safety	Conformance	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.
11.4 OH&S performance	Conformance	The process related to Occupational Health and Safety (OH&S) performance has been developed and implemented, including determination of OH&S lagging indicators and leading indicators, action planning to achieve the OH&S objectives, weekly and monthly monitoring and review of these indicators, trend analysis, and identification of top issues with corrective actions.

Document Control and Version History

Revision	Date	Notes
0	2 March 2022	Initial Certification Audit - Provisional Certification
1	27 July 2022	Surveillance Audit – Full Certification