

ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

ALCOA
ALUMINERIE DE
BAIE-COMEAU

CERTIFICATE
NUMBER

45

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

20 SEPTEMBER 2022

DATE OF EXPIRY

19 SEPTEMBER 2025

CERTIFIED SINCE

20 SEPTEMBER 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', written over a white background.

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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 Aluminerie de Baie-Comeau in Canada,
aluminum smelting, casthouse and administrative
associated facilities.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa
ENTITY NAME	Alcoa Aluminerie de Baie-Comeau
CERTIFICATION SCOPE	Alcoa Aluminerie de Baie-Comeau in Canada, aluminum smelting, casthouse and administrative associated facilities.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium smeltingCasthouse
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">9 – 11 July 2019 (Initial Certification Audit)4 – 8 July 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">16 August 2019 (Initial Certification Audit)5 August 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 – 11 July 2019)</u></p> <p>Aluminerie Alcoa de Baie-Comeau Smelting, including baking furnace, administrative facilities, and the Casthouse as part of Smelting.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium smeltingCasthouse <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit (10 -12 May 2022)</u></p> <p>Aluminerie Alcoa de Baie-Comeau Smelting, including baking furnace, administrative facilities, and the Casthouse as part of Smelting.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium smelting

-
- Casthouse

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

20 September 2022 – 19 September 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

19 September 2025

CERTIFICATE
NUMBER

45

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 the appointment of a competent legal team across organisational functions at corporate, regional, and local levels. The Entity has defined Policies and procedures to ensure the identification and communication of risks and compliance with applicable legislation.
1.2 Anti-Corruption	Conformance	The Entity has defined Policies and procedures to identify and manage risks against Corruption consistent with Applicable Law and prevailing international standards. The defined processes affect all employees in the Entity and subcontractors. There have been no violations within the last five years related to Anti-Bribery and Corruption or anti-competitive behaviour. https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption.asp
1.3 Code of Conduct	Conformance	The Entity has developed a Code of Conduct, a corporate Policy covering business integrity, Business Activities, conflicts of interest, Anti-Corruption, relations with customers and suppliers, and compliance with Human Rights. The Code of Conduct is available in English and French: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_French_Canadian.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented Policies consistent with Environmental, Social, and Governance (ESG) practices included in the ASI Performance Standard. Global EHS Policy: https://www.alcoa.com/sustainability/en/environment-health-safety.asp Alcoa Human Rights Policy: 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 endorses and provides support through the provision of resources and regularly reviews the range of applicable

CRITERION	RATING	COMMENT
		Policies. The Policies are well-communicated on site.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has published the Alcoa Policies on the intranet and printed copies are on boards throughout the site's main entrance in the local language. The Policies are all available on the Alcoa website:</p> <p>http://investors.alcoa.com/corporate-governance/governance-documents https://www.alcoa.com/global/en/who-we-are/values/default.asp https://www.alcoa.com/sustainability/en/environment-health-safety.asp https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp</p>
2.2 Leadership	Conformance	The Entity's Site Manager is responsible for the implementation of the ASI Performance Standard and each area has a designated owner (Single-Point Accountability or SPA).
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity holds an ISO 14001:2015 certificate, has implemented a Management System manual and utilises the SharePoint system to control and document environmental management non-compliances or findings.
2.3b Environmental and Social Management Systems (social)	Conformance	<p>Alcoa Corporate has developed and implemented social management Policies, procedures, standards, and guidelines.</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p>
2.4 Responsible Sourcing	Conformance	<p>Alcoa Corporate has implemented a Responsible Sourcing Policy and procedures covering ESG issues. The Alcoa Supplier Standards are publicly available at:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier_Standards.pdf</p>
2.5 Impact Assessments	Conformance	The Entity developed social and environmental Impact Assessments that cover changes on site, such as the Anse Du Moulin Bay remediation project located within the Entity's Area of Influence. More significant projects will be subject to a regulatory assessment process.
2.6 Emergency Response Plan	Conformance	The Entity has developed an Emergency Response Plan which was developed in conjunction with

CRITERION	RATING	COMMENT
		Stakeholder Consultation and meets regulatory requirements.
2.7 Mergers and Acquisitions	Conformance	Alcoa Corporate is responsible for the management and review of ESG issues in the Due Diligence process for Mergers and Acquisitions. This Entity provides regional and local inputs as required.
2.8 Closure, Decommissioning and Divestment	Conformance	Alcoa Corporate has developed a documented procedure to review ESG issues in the planning process for closure, decommissioning and divestment. There has been no Closure, Decommissioning or Divestment in the last seven years.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social, and economic impacts at a corporate level at: https://www.alcoa.com/sustainability/en/default.asp
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses through regulatory filings ongoing legal action that has the potential to result in fines, information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law. The disclosures are available at: https://investors.alcoa.com/sec-filings
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has implemented Anti-Corruption procedures and Policies. All payments to Governments are taxes or tributes made on a legal or contractual basis and are collated and reported in the Annual Report: https://investors.alcoa.com/sec-filings
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 implemented an accessible, transparent, understandable, culturally and gender-sensitive Complaints Resolution Mechanism to address stakeholder complaints, grievances and requests for information relating to its operations. https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line.asp
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. The Life-Cycle Assessment

CRITERION	RATING	COMMENT
		(LCA) is cradle to gate as the Entity does not sell finished Products and only primary Products (A1 to A3) verification statement for Greenhouse Gases (GHG) used and UL (an independent consultancy) verified the LCA.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity provides a cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium (containing) Product(s) in the 2021 Sustainability Report. https://www.alcoa.com/sustainability/en/default.asp
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Alcoa 2021 Sustainability Report includes a reference to the Environmental Product Declaration (EPD) based on the verified Life cycle Analysis. https://www.alcoa.com/sustainability/en/flipbook/index.html
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 targets and collects 100% of its Process Scrap for Collection, recycling and/or re-use. The Scrap inventory is kept updated and the Scrap target levels are defined. The Entity monitors its Process Scrap production and Product mixes with quantities and types of Scrap that can be used.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established a system to separate and record Aluminium alloys and grades for reuse. Dross is reintroduced after being processed by an external supplier who provides it back in sow form. Information on Product attributes is recorded within an operational and technical database.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity manufactures only primary Products and has implemented processes and actions for handling Scrap. The Entity's strategy includes a goal to increase recycling on an ongoing basis and is tracked.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity manufactures only primary Products and has implemented processes and actions for handling Scrap. The Entity promotes end-of-life recycling through local and national activities such as being a member of "The Recycling Partnership" the largest Aluminium recycling organisation in North America.

CRITERION	RATING	COMMENT
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has reported its GHG Emissions to Quebec Province under the Quebec Regulatory Requirement for the calendar years 2021 and 2022. Alcoa Corporate has publicly reported its energy consumption and GHG Emissions at the organisational level in the 2021 Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
5.2 GHG emissions reductions	Conformance	The Entity has published its time bound GHG Emissions reduction targets and has implemented a plan to achieve the targets. The targets address the material sources of Direct and Indirect GHG Emissions. More information is available at: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
5.3a Aluminium Smelting (management system)	Conformance	The Entity has implemented a GHG reporting and calculation system that complies with relevant Emissions Planning Regulations, an external auditor conducts an annual emissions audit.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The Entity has demonstrated that the Scope 1 and Scope 2 GHG Emissions from the production of Aluminium are below 8 tonnes CO ₂ -eq per metric tonne in the years 2019, 2020 and 2021.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable as 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	The Entity monitors, samples, quantifies, and reports air emissions monthly to the Quebec Ministry of Environment to comply with authorisations and permits. The Entity has established targets for these emissions according to its risks. These objectives, supported by action plans that are monitored regularly, and are assessed during an annual management review.
6.2 Discharges to Water	Conformance	The Entity monitors and reports Discharges to Water under its operating permit. The Entity is required to maintain an inventory of water discharge by source, the methodology for determining the discharge and monitoring records. When there are overruns of standards or criteria the government authorities are informed. The Entity

CRITERION	RATING	COMMENT
		analyses the situation to find the cause and implements remedial corrective measures to minimise the adverse impacts.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has established a Management System to register and assess associated risks and impacts of major risk areas of its operations where Spills and Leakage may contaminate air, water and/or soil. The assessment is documented and updated on an annual basis.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has completed risk assessments of Spills and Leakage potential and has developed an inventory of chemical and Product storage with contamination potential. The Entity has an incident recording and monitoring procedure and training for prevention and control of Spills.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has established an emergency plan and communication protocol to manage potential Spills and Leakage including how and when to report a Spill to governmental authorities, external Stakeholders, and the community.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publicly discloses the Impact Assessments of Spills, remediation actions, and reports publicly on an annual basis within Sustainability Report on page 150: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy designed according to the Waste Mitigation Hierarchy. The objective is to minimise Waste to landfill by finding markets for valorisation when reintroducing or recycling within the process is not possible. The monitoring and audits of the Waste management plan are conducted at both the plant and suppliers' Facilities.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has annually disclosed to the Ministry of Environment the quantity of Hazardous and Non-Hazardous Waste generated and associated Waste disposal methods. The information is published at the Corporate level in the 2021 Sustainability Report: https://www.alcoa.com/sustainability/en/flipbook/150/index.html
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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 a designated SPL storage building where SPL is stored before shipment. The storage area is inspected quarterly in accordance to relevant legal requirements.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has implemented a continuous process of optimising the recovery and recycling of carbon and refractory materials. Currently, there are no identified alternative options for recycling pre-treated crushed SPL (refractory) in Quebec or alternatives for higher-value recycling. However, the Entity is continuously seeking alternative options for recycling.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity's SPL is pre-treated before it is discarded in an authorised landfill. There are no adverse impacts to the environment associated with the landfilling of the treated SPL.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity has conducted reviews and made several attempts in 2021 to identify SPL recycling options.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity's pre-treated SPL are landfilled, and it is not sent to marine or aquatic environments.
6.8a Dross (recovery)	Conformance	The Entity currently maximises the recovery of Aluminium by treatment of Dross and Dross residues. The Dross is sent to a recycling plant to recover Aluminium, the Dross residue is shipped back and is landfilled. 100% of the Aluminium is recovered from the Dross.
6.8b Dross (recycling)	Conformance	The Entity is in the process of maximising the recycling of treated Dross residues. All the Dross (i.e. from both the furnace and pig carousel) from the foundry is sent to a specialised external firm for

CRITERION	RATING	COMMENT
		treatment and recycling. All recycled material is reintroduced or reused at multiple levels in the production process.
6.8c Dross (review of alternatives)	Conformance	The Entity is regularly reviewing alternative options for the landfilling of Dross residue and exploring options for recycling.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped its water withdrawal and use by source and type by conducting a biennial survey of industrial water. This survey provides the following information: water source, treatment of water before use, initial use of water, recirculation or reuse of water, treatment of water before its evacuation, last evacuation points, a monthly distribution of the removal and the evacuation of the water, costs of acquisition, maintenance and operation of water networks and evacuation. The report is documented and supported by statistics from monitoring activities. The last survey was completed in 2022.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a documented Environmental Risk Assessment which includes water. Water used related to Watershed sources are not considered a risk. Documented topographic maps and Watersheds mapping allow an overview of the different Watersheds on the plant site.
7.2a Water management (management plans)	Conformance	The Entity has implemented a water management plan with actions and controls to mitigate adverse impacts. The water management plan considers the amount of water used and efforts to reduce use. Monthly consumption is monitored, and leak tests are conducted to identify potential leaks in the pipes. Statistics demonstrate that the consumption of water has diminished in recent years.
7.2b Water management (monitoring)	Conformance	The Entity has established goals and measurable targets to monitor and review the effectiveness of its water management plans. Water use and material water-related risks at a corporate level are published in the sustainability report, pages 150-156: https://www.alcoa.com/sustainability/en/flipbook/150/index.htm
7.3 Disclosure of water usage and risks	Conformance	Alcoa Corporate undertakes an annual survey (data collection) across all Facilities to get a detailed

CRITERION	RATING	COMMENT
		understanding of water use. The information collected is published at the corporate level in the Sustainability Report, pages 152-157: https://www.alcoa.com/sustainability/en/flipbook/150/index.htm
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has engaged with an external firm (WSP Global) to assess the risks and impacts on biodiversity for all its activities and the Entity's Area of Influence. The result is a report with a risk assessment of biodiversity impacts from the Entity's activities.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The report from the Biodiversity assessment provides an up-to-date risk assessment of biodiversity impacts from activities and includes a study of identified risks and a proposed action plan for mitigation.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity's Biodiversity Action Plan proposes developing controls using the 'mitigation hierarchy' to avoid, minimise, rehabilitate, or offset impacts on biodiversity.
8.2c Biodiversity management (reporting)	Conformance	Alcoa's corporate Policies, actions, and overall performance related to Biodiversity management and issues are available in the 2021 Sustainability Report, pages 118 – 124: https://www.alcoa.com/sustainability/en/flipbook/index.html
8.3 Alien Species	Conformance	The Entity has implemented a system to check incoming boats for invasive species. In addition, a Canadian program on ballast water management has been implemented in order to limit the introduction of Invasive Alien Species.
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.

CRITERION	RATING	COMMENT
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 Alcoa Policy states the Entity's commitment to respect Human Rights according to the UN Guiding Principles on Business and Human Rights. The Policy is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has undertaken a Human Rights Due Diligence process that seeks to identify, prevent, mitigate, and account for how it addresses its actual and potential impacts on Human Rights. The Entity's Human Rights Due Diligence process was conducted and was updated in 2022 following the Alcoa corporate guides and is aligned with the UN Guiding Principles on Business and Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has implemented a process for the remediation of Human Rights Policy breaches. Human Rights is included in the Code of Conduct and is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_French_Canadian.pdf
9.2 Women's Rights	Conformance	The Entity has implemented Policies and processes regarding the rights of Women, such as a diversity action plan and an Equal Employment Opportunity Policy: https://www.alcoa.com/global/en/careers/pdf/Alcoa-EEO.pdf
9.3 Indigenous Peoples	Conformance	The Entity has implemented Policies and processes to ensure respect for the rights and interests of Indigenous Peoples. The Entity's Impact Assessment on Anse Du Moulin found that there were no impacts by the Entity's activities on Indigenous Peoples who live in Pessimet, approximately sixty-five kilometres from the site. They were invited to participate in the Biodiversity assessment.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	The Entity has consulted and cooperated with the Indigenous Peoples to obtain their Free, Prior and Informed Consent for any New Projects or major changes that may have significant impacts.

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Conformance	The Entity's Impact Assessments confirm that there is no impact from the Entity's activities on sacred or cultural heritage sites. This has been verified through interviews with Stakeholders.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as the Entity strictly operates within the boundaries of its property where no people live, therefore there are no projects where physical and/or economic displacements of people were required.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as the Entity strictly operates within the boundaries of its property where no people live, therefore there are no projects where physical and/or economic displacements of people were required.
9.7a Local Communities (rights and interests)	Conformance	The Entity meets Canadian local regulations, and the community partnership in place has been cited as Best Practice by UNESCO.
9.7b Local Communities (impacts)	Conformance	The Entity has conducted its Human Rights Due Diligence, the outcome identified there are no issues affecting Local Communities in terms of Human Rights. However, if projects have an impact on the environment, they are evaluated using the concept 'Perform concept and start-up projects, Environmental Safety and Health Review (PESHR).
9.7c Local Communities (livelihoods)	Conformance	The Entity's Baie Comeau employees and the community have partnership projects which are financially supported by the Alcoa Foundation. More information is available at: http://mavillemavoix.com
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented a third-party supplier Due Diligence program to manage supply chain risks in the following areas: Anti-Bribery and Bribery, trade compliance, Child Labour and slavery, criminal history, Human Trafficking, and conflict minerals. This Due Diligence program is managed at the corporate level.
9.9 Security practice	Conformance	The Entity has engaged a private security Contractor. They are contractually required to respect and apply all Alcoa local and corporate Policies and rules, including the Human Rights Policy and the Code of Conduct. They are also trained by Entity on the Policies and rules.

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity's Workers are represented by two Labour Unions with significant representation and engagement.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to collectively bargain and adheres to Collective Bargaining agreements. The most recent collective agreement came into effect in May 2019 and is valid until 2025.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as Canadian laws allow the Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity's Human Rights Policy and Code of Conduct both prohibit the use of Child Labour as defined in defined by ILO Conventions C138 and C182 and Canadian law. The youngest employee identified was 19 years old.
10.2b Child Labour (hazardous)	Conformance	The Entity's Human Rights Policy, Code of Conduct and implemented procedures prohibit the use of Child Labour and therefore there is no opportunity for Hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Entity's Human Rights Policy, Code of Conduct and implemented procedures prohibit the use of Child Labour and therefore there is no opportunity for the Worst Forms of Child Labour to occur.
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Human Rights Policy and Code of Conduct are implemented in the Entity's procedures (e.g., procurement procedures and third-party checks).
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity's Human Rights Policy and Code of Conduct are implemented in the Entity's procedures. It does not require recruitment or other Fees to be paid by the Worker.
10.3c Forced Labour (migrant workers)	Conformance	The Entity's Human Rights Policy and Code of Conduct are implemented in the Entity's procedures. It does not require recruitment or other Fees to be paid by Workers. No deposits or security payments are required at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity's Human Rights Policy and Code of Conduct are implemented in the Entity's procedures. It does not require recruitment or other Fees to be paid by Workers.

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	The Entity's Human Rights Policy and Code of Conduct are implemented in the Entity's procedures. There is no unreasonable restriction on the freedom of movement of Workers in the workplace. There is no on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity's Human Rights Policy and Code of Conduct are implemented in the Entity's procedures. There is no retention of original copies of Workers' identity papers, work permits or travel documents. Worker's training records are kept in a system that they can access with no restrictions.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's Human Rights Policy and Code of Conduct are implemented in the Entity's procedures. Workers have the freedom to terminate their employment by informing their supervisor, Human Resources Manager or other Manager including confirmation in writing.
10.4 Non-Discrimination	Conformance	The Entity has Policies, a Code of Conduct, and procedures to ensure equal opportunities for all Workers. Alcoa has diversity support and network groups such as EAGLE (Employees at Alcoa for Gays, Lesbians by sexual and transgender Equality) and AWN (Alcoa Woman Network). The Entity has a representative for EAGLE on site.
10.5 Communication and engagement	Conformance	The Collective Bargaining agreement between Workers, the Union, and the Entity ensures open communication and direct engagement with Workers and their representatives. Staff meetings are held twice a year.
10.6 Disciplinary practices	Conformance	The Entity has implemented Policies, a Code of Conduct, and procedures relating to disciplinary practices such as a complaint process. The implemented bargaining agreement includes a grievance procedure.
10.7a Remuneration (living wage)	Conformance	Wages are paid according to the Collective Bargaining agreement, which are higher than alternatives in the area and more than enough to meet basic needs. This was verified through interviews with Union representatives.
10.7b Remuneration (method of payment)	Conformance	The Entity has demonstrated the payment of wages is in line with the collective agreement, paid on time, in legal tender and documented.

CRITERION	RATING	COMMENT
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time and has implemented a procedure regarding Working Time regulations such as the approval of Overtime or if people are working over the allowed hours.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an OH&S Policy at the corporate and local levels. And is communicated through several channels such as committees, pre-task meetings, and training. The Alcoa corporate OH&S Policy is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-EN.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity requires that all employees and Visitors complete safety training and acknowledge the OH&S Policy before accessing the site or during their first visit. The commitment to respect OH&S Policy and rules is documented for each Visitor.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented a Local Health and Safety Policy, it includes a commitment to meet all legislation and international norms, including ILO Conventions on Occupational Health and Safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Local Health and Safety Policy includes Workers right to understand the hazards and safe practices for their work and the authority to refuse or stop unsafe work. Prevention activities to remind Workers of this right were confirmed by Workers who feel they can stop processes with no risk of retribution.
11.2 OH&S Management System	Conformance	Alcoa Corporate has a documented Corporate Occupational Health and Safety Management System and Environment Health and Safety (EHS) Alcoa standard that complies with applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	The Entity has implemented multiple mechanisms where Workers can raise OH&S issues with management. Members of the Union for prevention and committee are elected within the Union. Employees can raise issues with managers, SPAs (Single-Point Accountability), supervisors, and Union H&S representatives. Weekly Joint Commission meetings with prevention representatives present to reinforce the incident reporting process.

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	The Entity has implemented a dedicated Reporting platform to record and show lagging Key Performance Indicators (KPIs) results of incidents and leading indicators (potential incidents). Benchmarking activities are undertaken for all Alcoa sites. The Entity documents near misses and real incidents to see trends and to act, if necessary, with action plans.

Document Control and Version History

Revision	Date	Notes
0	20 September 2019	Initial Certification Audit - Full Certification
1	20 September 2022	Re-Certification Audit