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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# ALCOA INC.

CERTIFICATE  
NUMBER

218

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

23 AUGUST 2022

DATE OF EXPIRY

22 AUGUST 2025

CERTIFIED SINCE

23 AUGUST 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall'.

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

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

Corporate programs, policies and procedures at  
Alcoa Corporate Head Office in Pittsburgh, USA.

# SUMMARY AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME Alcoa Corporation

ENTITY NAME Alcoa Inc.

CERTIFICATION SCOPE Corporate programs, policies and procedures at Alcoa Corporate Head Office in Pittsburgh, USA.

SUPPLY CHAIN ACTIVITIES

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Initial Certification Audit

AUDIT FIRM DNV Business Assurance Services UK Ltd.

AUDIT DATE 19 – 22 April 2022

AUDIT REPORT SUBMISSION 30 June 2022

AUDIT SCOPE The audit scope included the corporate programs, policies and procedures at Alcoa Corporate Head Office.

Supply chain activities included in the audit scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

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AUDIT  
OUTCOME

- Certification
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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
  - The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
  - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
  - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION  
PERIOD

23 August 2022 – 22 August 2025

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

22 August 2025

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CERTIFICATE  
NUMBER

218

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## SUMMARY OF FINDINGS

| CRITERION                      | RATING      | COMMENT   |
|--------------------------------|-------------|---|
| PRINCIPLE 1 BUSINESS INTEGRITY |             |   |
| 1.1 Legal Compliance           | Conformance | <p>The Alcoa Ethics and Compliance (E&amp;C) organization manages the corporate policy and procedure governance process. The Legal Department consists of in-house counsel with qualified lawyers in the main jurisdictions where Alcoa has operations (US, Australia, Brazil, EU) and are responsible for maintaining awareness of and, together with the E&amp;C organization, ensuring compliance with Applicable Law.</p> <p>The effectiveness of this Criterion is further assessed at location-level during ASI periodic audits where local conformance and legal compliance is reviewed. For further information, refer to the Alcoa 2021 Sustainability Report, in the Governance, Ethics and Compliance section, pages 16-19:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/2/index.html">https://www.alcoa.com/sustainability/en/flipbook/2/index.html</a></p> |
| 1.2 Anti-Corruption            | Conformance | <p>The Entity has implemented processes to prevent Bribery and help ensure compliance with anti-bribery laws in the countries where they operate. The Anti-Corruption Policy and related procedures (Due Diligence and Contracting Procedure for Intermediaries; Charitable Contributions Procedure; and Gifts, Hospitalities and Travel Procedure) are designed to address Corruption risk. The Policy and corresponding procedures are addressed in annual mandatory training for employees. For further information, refer to the Alcoa 2021 Sustainability Report, in the Governance, Ethics and Compliance section, pages 19-21:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/2/index.html">https://www.alcoa.com/sustainability/en/flipbook/2/index.html</a></p>  |
| 1.3 Code of Conduct            | Conformance | <p>The Entity has revised and implemented its Code of Conduct and Ethics:<br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</a></p> <p>The Code of Conduct and Ethics is included in employee onboarding training and ongoing training requirements.</p> <p>Alcoa's Supplier Standards are communicated to suppliers and are included in Alcoa's standard Terms and Conditions for suppliers:</p>  |

| CRITERION  | RATING      | COMMENT   |
|--|-------------|---|
|  |             | <p><a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf</a></p> <p>Alcoa conducts regular supplier Due Diligence and Human Rights Due Diligence to evaluate the implementation of the Code.</p>  |
| PRINCIPLE 2 POLICY & MANAGEMENT  |             |   |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | <p>Alcoa has implemented and maintains both integrated and stand-alone Policies consistent with the environmental, social, and governance practices included in the ASI Performance Standard. Recently adopted Policies address areas including social performance, Indigenous Peoples, cultural heritage and Human Rights, and each are supported with an Alcoa standard which includes guidance notes and the expectations of the ASI Performance Standard. Alcoa operates a Sustainability Governance Board, which is a subset of the Executive Team and responsible for the oversight of Alcoa's environmental, social and governance strategy, evaluation of results/performance against targets and management of risks.</p>  |
| 2.1b Environmental, Social, and Governance Policy (senior management)      | Conformance | <p>Alcoa has created a Sustainability Committee, comprised of Executive Team members to ensure Alcoa appropriately integrates sustainability priorities within the enterprise strategy. In addition to the Sustainability Committee, the Sustainability Governance Board approves sustainability strategies, evaluates results against targets and manages sustainability risks.</p> <p>The Safety, Sustainability and Public Issues Committee Charter is available via:<br/> <a href="https://s29.q4cdn.com/945634774/files/doc_govs/2021/Safety-Sustainability-and-Public-Issues-Committee-Charter-September-2021-(Final).pdf">https://s29.q4cdn.com/945634774/files/doc_govs/2021/Safety-Sustainability-and-Public-Issues-Committee-Charter-September-2021-(Final).pdf</a></p> <p>For further information on Alcoa's Governance approach to environmental, social and governance (ESG) topics, refer to the Alcoa 2021 Sustainability Report, pages 6-17 and 166:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/2/index.html">https://www.alcoa.com/sustainability/en/flipbook/2/index.html</a></p> |
| 2.1c Environmental, Social, and Governance Policy (communication)          | Conformance | <p>Alcoa has communicated its policies and procedures related to environmental, social and governance (ESG) aspects externally through the website and through contracts, and internally through the hiring processes, intranet and specific trainings and</p>  |

| CRITERION  | RATING      | COMMENT  |
|--|-------------|--|
|  |             | <p>meetings.</p> <p>Governance documents are available via:<br/> <a href="http://investors.alcoa.com/corporate-governance/governance-documents">http://investors.alcoa.com/corporate-governance/governance-documents</a><br/> EHS Vision, Values, Mission, and Policy:<br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/ehs-vision-values-mission-and-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/ehs-vision-values-mission-and-policy</a><br/> Human Rights Policy:<br/> <a href="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/human-rights-policy</a><br/> Alcoa's Supplier Standards:<br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards</a><br/> For further information on Alcoa's ESG Policies, refer to the Alcoa sustainability webpage:<br/> <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></p> |
| 2.2 Leadership   | Conformance | <p>The Alcoa CEO has nominated the Executive Vice President and Chief Operations Officer as having overall responsibility and authority for ensuring conformance with ASI Performance Standard. The management representative has been communicated internally to all employees and posted on the Alcoa intranet site.</p>   |
| 2.3a Environmental and Social Management Systems (environmental) | Conformance | <p>Alcoa has implemented Environmental Management Systems aligned with ISO 14001 and Health and Safety Management Systems aligned with ISO 45001 at all Alcoa managed locations. The Management Systems describes aspects according to ISO 14001 requirements, including commitment and leadership, EHS risks, aspects and impacts, legal and other compliance obligations, EHS objectives, targets and action plans, training and communication. The effectiveness of the Environmental Management Systems are further reviewed during ASI Performance Standard Audits at location-level.</p>   |
| 2.3b Environmental and Social Management Systems (social)        | Conformance | <p>Alcoa has a Social Management System, introduced in 2021, and designed so policies and standards at all Alcoa managed locations support effective engagement with communities, manage social risks and maintain Alcoa's social license to operate. The Entity has a Social Performance Management Unit to support the implementation and integration of the Social Management System. For further information, refer to the Alcoa 2021 Sustainability Report, page 6:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/2/index.html">https://www.alcoa.com/sustainability/en/flipbook/2/index.html</a></p>  |

| CRITERION                   | RATING      | COMMENT   |
|-----------------------------|-------------|---|
| 2.4 Responsible Sourcing    | Conformance | <p>The Alcoa Supplier Standards were updated in January 2021:<br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf</a></p> <p>Alcoa has developed a Supplier Sustainability Program which has three key components: assessment of Alcoa's supply chain and supply chain source materials against ESG risks; audit to verify implementation, provide due diligence, and increase transparency, and; collaborate with supply chain partners through improvement plans.</p> <p>For further information on the Responsible Sourcing Policy and implementation, refer to the Alcoa 2021 Sustainability Report, page 100-109:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/2/index.html">https://www.alcoa.com/sustainability/en/flipbook/2/index.html</a></p> <p>Also refer to Alcoa of Australia Limited's Modern Slavery Statement:<br/> <a href="https://www.alcoa.com/australia/en/pdf/Alcoa-Modern-Slavery-Statement.pdf">https://www.alcoa.com/australia/en/pdf/Alcoa-Modern-Slavery-Statement.pdf</a></p> |
| 2.5 Impact Assessments      | Conformance | <p>Alcoa has implemented the processes and guidance to conduct environmental and social risk assessments, for New Projects or Major Changes to existing facilities, including the Project EHS Review (PEHSR) which addresses environmental and social aspects for capital projects and the Human Rights Impact Assessment (HRIA). Environmental and Social Impact Assessments follow recognised methodologies, such as International Council on Mining and Metals (ICMM) guidelines.</p> <p>A more extensive guidance document has been added for social impact assessment and the development of new tools for due diligence for new countries, or joint ventures.</p> <p>The effectiveness of these procedures is further reviewed at location-level in case of New Projects or Major Changes to existing facilities.</p>   |
| 2.6 Emergency Response Plan | Conformance | <p>All Alcoa locations are required to develop and implement Emergency Response Plans, which are tested and shared with Communities that could be potentially impacted. Testing and evaluations of these plans are mandated and regularly assessed by the Entity and independent third parties.</p> <p>The effectiveness of these policies and procedures is further reviewed during ASI Performance Standard Audits at location-level.</p>   |

| CRITERION                                   | RATING      | COMMENT  |
|---|-------------|--|
| 2.7 Mergers and Acquisitions                | Conformance | <p>The consideration of ESG risks and opportunities is integrated into Alcoa's mergers and acquisitions (M&amp;A) transactions due diligence processes. The due diligence process comprises of a comprehensive evaluation tool on employee matters (e.g., corporate bargaining agreements and the extent to which these are adhere to), environmental matters (e.g., permitting), non-compliance issues, procurement, taxation, insurance and risk management, as well as other financial matters.</p>   |
| 2.8 Closure, Decommissioning and Divestment | Conformance | <p>The Entity has reviewed conditions at its operating locations and relevant environmental, social and governance (ESG) issues are addressed in line with planning processes for closure, decommissioning and divestment. The Corporate Transformation Team is responsible for overseeing project progress and delivery, working with Alcoa locations, and affected Stakeholders.</p> <p>Alcoa has improved its Stakeholder alignment on risk management of closures with the introduction of the Human Rights Council and Social Performance management.</p> <p>Alcoa's EHS Standard applies to the acquisition or divestiture of a business or real estate. The policy outlines roles and responsibilities for management for locations which are majority-owned or effectively controlled by Alcoa.</p>  |
| PRINCIPLE 3 TRANSPARENCY                    |             |  |
| 3.1 Sustainability Reporting                | Conformance | <p>Alcoa publicly discloses its governance approach and its material environmental, social and economic impacts in its Annual Report, Proxy Statement and Sustainability Report. Alcoa's 2021 Sustainability Report has been prepared according to the Global Reporting Initiative (GRI) guidelines and aligns with the Sustainability Accounting Standards Board Standards (SASB), United Nations Sustainable Development Goals (SDGs) and the International Council for Mining and Metals (ICMM) 10 Principles disclosure requirements:</p> <p><a href="https://www.alcoa.com/sustainability/en/flipbook/2/index.html">https://www.alcoa.com/sustainability/en/flipbook/2/index.html</a></p> <p>ERM Certification and Verification Services (ERM CVS) provides independent assurance over selected information in the Sustainability Report.</p> |
| 3.2 Non-compliance and liabilities          | Conformance | <p>Alcoa Corporation's annual and quarterly reports are publicly filed with the U.S. Securities and Exchange</p>   |



| CRITERION   | RATING             | COMMENT   |
|---|--------------------|---|
|   |                    | <p>Commission (SEC) and are available on the Entity's website:<br/> <a href="https://investors.alcoa.com/sec-filings/default.aspx">https://investors.alcoa.com/sec-filings/default.aspx</a>.<br/> Alcoa discloses information on any legal proceedings and environmental matters in the Annual Report (Form 10-K), on page 37-38. No significant fines were reported by Alcoa in the last reporting period.</p>   |
| <p>3.3a Payments to governments (legal and contractual)</p>       | <p>Conformance</p> | <p>Alcoa has disclosed information on the Alcoa Corporation and Subsidiaries consolidated balance sheet and current liabilities (e.g., taxes), in the Annual Report, page 68:<br/> <a href="https://investors.alcoa.com/sec-filings/sec-filings-details/default.aspx?FilingId=15600623">https://investors.alcoa.com/sec-filings/sec-filings-details/default.aspx?FilingId=15600623</a><br/> Alcoa's Anti-Corruption and Bribery Policy requires all payments to governments to be made on a legal and/or contractual basis. Alcoa has a due diligence and contracting procedure for Intermediaries which describes the due diligence measures to ensure compliance with applicable anti-corruption laws and regulations, including but not limited to those based upon the OECD Convention and the United States Foreign Corrupt Practices Act (FCPA).<br/> Alcoa operates multiple functions where any concerns can be anonymously reported in relation to Alcoa's ethics and compliance procedures.</p>   |
| <p>3.3b Payments to governments (disclosure - bauxite mining)</p> | <p>Conformance</p> | <p>Alcoa is a signatory to the Extractive Industries Transparency Initiative (EITI) which supports enhancing the transparency of mineral revenues. Alcoa has four active Bauxite Mining areas in Australia and Brazil. Currently, Australia and Brazil are not EITI-implementing countries.<br/> In Australia, Alcoa is a signatory to the government's Voluntary Tax Transparency Code and the Entity publicly discloses Alcoa of Australia's tax payments via an Annual Report:<br/> <a href="https://www.alcoa.com/australia/en/sustainability/reports-publications">https://www.alcoa.com/australia/en/sustainability/reports-publications</a><br/> In Brazil, mining rights are granted through mining concessions by the Federal Government, through the Agência Nacional de Mineração (National Mining Agency) or the Ministério de Minas e Energia (Ministry of Mines and Energy). Each mining area is subject to a mining concession.<br/> Further detail on payments to governments, including Bauxite Mining activities is available in the 2021 Sustainability Report, page 54-55:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
| 3.4 Stakeholder complaints, grievances and requests for information | Conformance    | The Entity is certified to ISO 14001:2015 which covers communication and Management System certificates are validated during ASI Audits at Alcoa locations. Alcoa operates multiple lines where concerns can be anonymously reported, including via the Integrity Line which is available globally in multiple languages.   |
| PRINCIPLE 4 MATERIAL STEWARDSHIP                                    |                |   |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts)       | Conformance    | Alcoa's EcoLum products represent a full suite of low carbon cast products which covers approximately 90% of Alcoa's products lines and produced at Alcoa Smelters predominantly operated with hydro-electric power. This Life Cycle Assessment (LCA) is independently verified according to ISO 14044, and the LCA is cradle-to-gate, covering raw material extraction, transportation and manufacturing stages: <a href="https://www.alcoa.com/sustainability/en/pdf/EcoLum.pdf">https://www.alcoa.com/sustainability/en/pdf/EcoLum.pdf</a>   |
| 4.1b Environmental Life Cycle Assessment (cradle to gate)           | Conformance    | Alcoa has established procedures for customers and other interested parties, such as investors to request cradle-to-gate environmental Life Cycle Assessments (LCA) for Alcoa products. The LCA information is independently verified by UL Environment according to ISO 14044. EcoLum products are produced with less than 4 metric tons of CO <sub>2</sub> e for every metric tonne of metal, including both direct and indirect emissions for Bauxite Mining, Alumina Refining, Smelting and Casting. For further information, refer to Alcoa's 2021 Sustainability Report, page 47: <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a> |
| 4.1c Environmental Life Cycle Assessment (public communication)     | Conformance    | An Environmental Product Declaration for Alcoa's EcoLum products is available: <a href="https://docplayer.net/199163597-Ecolum-cast-aluminum-products.html">https://docplayer.net/199163597-Ecolum-cast-aluminum-products.html</a><br>This link contains access to the LCA information and its underlying assumptions including system boundaries. The LCA information has been independently verified by UL Environment, a third-party assessor according to ISO 14044.  |
| 4.2 Product design  | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 4.3a Aluminium Process Scrap (targets)                              | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
| 4.3b Aluminium Process Scrap (alloy separation)                       | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.   |
| 4.4a Collection and recycling of products at end-of-life (strategy)   | Conformance    | Alcoa supports End of Life recycling through global external activities. Alcoa are founding members of The Recycling Partnership, supporting recycling programs focused on post-consumer recycling across the USA. Alcoa's ASTRAEA™ process converts Post-Consumer Scrap into high purity Aluminium. Alcoa is developing this process that can convert low-quality Aluminium scrap to quality levels that exceed the purity levels at commercial smelters.<br>For further information, please refer to the 2021 Sustainability Report, page 51:<br><a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a>                                     |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance    | Alcoa has established partnerships with recycling initiatives. In the United States, the Alcoa Foundation has engaged with The Recycling Partnership through financial support and representation as a corporate partner. The organization uses public-private partnerships to improve residents' access to recycling at the local level. The Alcoa Foundation's commitment to The Recycling Partnership helped support numerous projects across the United States. For further information on Alcoa's engagement efforts, please refer to the 2021 Sustainability Report, page 51:<br><a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a> |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS                                  |                |  |
| 5.1 Disclosure of GHG emissions and energy use                        | Conformance    | Alcoa discloses its Direct (Scope 1) GHG Emissions, Indirect (Scope 2 location based) GHG Emissions and other Indirect (Scope 3) emissions via its 2021 Sustainability Report, pages 125-129:<br><a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a><br>Alcoa's energy use by source is disclosed in the 2021 Sustainability Report, on page 131.<br>ERM CVS provided limited assurance over selected information as described in their statement in the 2021 Sustainability Report, on pages 180-181.   |
| 5.2 GHG emissions reductions  | Conformance    | The Entity has introduced short and mid-term goals to align Alcoa's GHG (Direct and Indirect) Emissions reduction targets with the below 2°C decarbonization path defined in the Paris Climate Accord. Alcoa has   |

| CRITERION  | RATING         | COMMENT  |
|--|----------------|--|
|  |                | <p>established a commitment to reduce its GHG Emissions intensity by 30 percent by 2025 and 50 percent by 2030 from a 2015 baseline. Alcoa achieved a 23.9 percent reduction from the baseline through 2021. Alcoa's GHG Emissions are independently assured by ERM CVS. Please refer to the 2021 Sustainability Report, page 125:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> <p>Alcoa has disclosed its climate-related risks according to the Taskforce on Climate-Related Financial Disclosures (TCFD) requirements in the Sustainability Report, on page 121, and its decarbonisation strategy on pages 127-128.</p>   |
| 5.3a Aluminium Smelting (management system)        | Conformance    | <p>The Entity has implemented a Management System to monitor Direct and Indirect GHG (Scope 1 and Scope 2) Emissions from Alcoa's smelting operations. Monthly and quarterly monitoring processes are established to limit Scope 1 and 2 GHG Emissions from smelting operations. A technology roadmap to further reduce emissions has been established, which includes the ELYSIS™ joint venture technology that eliminates all Greenhouse Gases from the traditional smelting process. Further information on the technology is available at:<br/> <a href="https://news.alcoa.com/press-releases/press-release-details/2021/Alcoa-Announces-Technology-Roadmap-to-Support-Its-Vision-to-Reinvent-the-Aluminum-Industry-for-a-Sustainable-Future/default.aspx">https://news.alcoa.com/press-releases/press-release-details/2021/Alcoa-Announces-Technology-Roadmap-to-Support-Its-Vision-to-Reinvent-the-Aluminum-Industry-for-a-Sustainable-Future/default.aspx</a></p> <p>The effectiveness of Alcoa's Management Systems is further reviewed during ASI Performance Standard Audits at location-level.</p> |
| 5.3b Aluminium Smelting (up to and including 2020) | Conformance    | <p>In 2021, Alcoa's carbon emissions intensity in smelting operations was 4.43 tonnes of CO<sub>2e</sub> per tonne of production. The underlying assumptions and methodology are described in the Alcoa 2021 Sustainability Report, page 125:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> <p>The data is independently assured by ERM CVS in the Statement on pages 180-181.</p>  |
| 5.3c Aluminium Smelting (after 2020)               | Not Applicable | This Criterion is not applicable as there are no smelters planned to start production after 2020.  |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
| 6.1 Emissions to Air  | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.2 Discharges to Water   | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.3a Assessment and Management of Spills and Leakage (assessment) | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.3b Assessment and Management of Spills and Leakage (management) | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.4a Reporting of Spills (immediate disclosure)                   | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.4b Reporting of Spills (regular reporting)                      | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.5a Waste management and reporting (strategy)                    | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.5b Waste management and reporting (disclosure)                  | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.6a Bauxite Residue (storage construction)                       | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.6b Bauxite Residue (integrity checks and controls)              | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.6c Bauxite Residue (water discharge)                            | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.6d Bauxite Residue (marine and aquatic environments)            | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.6e Bauxite Residue (state of the art technologies)              | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
| 6.6f Bauxite Residue (remediation)                            | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.7a Spent Pot Lining (SPL) (storage and management)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7b Spent Pot Lining (SPL) (recovery and recycling)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7c Spent Pot Lining (SPL) (Untreated SPL)                   | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7d Spent Pot Lining (SPL) (review of alternatives)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.7e Spent Pot Lining (SPL) (marine and aquatic environments) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 6.8a Dross (recovery)   | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.8b Dross (recycling)  | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 6.8c Dross (review of alternatives)                           | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |

#### PRINCIPLE 7 WATER STEWARDSHIP

|  |                |  |
|--|----------------|--|
| 7.1a Water assessment (mapping)          | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 7.1b Water assessment (risk assessment)  | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 7.2a Water management (management plans) | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 7.2b Water management (monitoring)       | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 7.3 Disclosure of water usage and risks  | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
| PRINCIPLE 8 BIODIVERSITY  |                |   |
| 8.1 Biodiversity assessment   | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 8.2a Biodiversity management (biodiversity action plans)                            | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 8.2b Biodiversity management (consultation and mitigation hierarchy)                | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 8.2c Biodiversity management (reporting)  | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 8.3 Alien Species   | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines) | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 8.4b Commitment to “No Go” in World Heritage properties (existing operations)       | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 8.5a Mine rehabilitation (best available techniques)                                | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 8.5b Mine rehabilitation (financial provisions)                                     | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| PRINCIPLE 9 HUMAN RIGHTS  |                |   |
| 9.1a Human Rights Due Diligence (policy)  | Conformance    | <p>Alcoa has incorporated a commitment to support the United Nations Guiding Principles for Business and Human Rights and the International Labour Organization Core Conventions in its Human Rights Policy:</p> <p><a href="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/human-rights-policy</a></p> <p>The Human Rights Policy operates in conjunction with the following:</p> <ul style="list-style-type: none"> <li>• Alcoa Code of Conduct and employee training, both of which cover Human Rights</li> <li>• Indigenous Peoples Policy</li> </ul> |

| CRITERION                                     | RATING      | COMMENT  |
|---|-------------|--|
|   |             | <ul style="list-style-type: none"> <li>• Social Policy</li> <li>• Supplier Standards, which explicitly indicate respect of Human Rights</li> <li>• Internal and third-party supplier assessment programs for new and existing suppliers</li> <li>• Equal Employment Opportunity Policy</li> <li>• Harassment and Bullying Free Workplace Policy</li> <li>• Integrity Line for employees, suppliers and the general public to report potential violations or concerns.</li> </ul> <p>The Alcoa Human Rights Council is sponsored at the executive level of Alcoa and includes representatives from each key resource unit and each region where it operates. The Council meets monthly and provides feedback to the sponsors twice a year to keep the Executive Team informed on Human Rights activities.</p> |
| 9.1b Human Rights Due Diligence (process)     | Conformance | <p>Alcoa has a Human Rights Council which developed a Human Rights Management Standard to operationalize the Human Rights Policy and define clear roles and responsibilities for different parts of the organization. A Human Rights Due Diligence Assessment has been developed for each Alcoa locations certified to the ASI Performance Standard, following the model established by the Danish Institute for Human Rights.</p> <p>For further information on Alcoa's Human Rights Due Diligence efforts, refer to the Alcoa 2021 Sustainability Report, pages 73-77:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p>  |
| 9.1c Human Rights Due Diligence (remediation) | Conformance | <p>Alcoa has an anti-retaliation policy which expressly prohibits retaliation against anyone who reports any issue in good faith. All employees and external Stakeholders can report concerns through Alcoa's Integrity Line without fear of retaliation.</p> <p>Alcoa has identified cases of having caused or contributed to Human Rights impacts. The effectiveness of Alcoa's systems and remediation actions are further reviewed during location level ASI Performance Standard audits and interviews with affected Communities.</p>   |
| 9.2 Women's Rights                            | Conformance | <p>Alcoa has implemented the Equal Employment Opportunity Policy, Human Rights Policy and Code of Conduct which prohibits Discrimination based on gender. Alcoa has most recently developed its Inclusion, Diversity and Equity Policy which is due to</p>   |



| CRITERION                                    | RATING      | COMMENT  |
|--|-------------|--|
|  |             | <p>be rolled out later this year. The policy puts strategic emphasis on the equity perspective.</p> <p>In 2021, Alcoa conducted a gender pay equity analysis, the third year to complete a study supervised by a third-party consultant using commonly used methodology.</p> <p>For further information, please refer to the Alcoa 2021 Sustainability Report, pages 81-84:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p>   |
| 9.3 Indigenous Peoples                       | Conformance | <p>Alcoa has implemented policies and processes to ensure respect for the rights and interests of Indigenous Peoples, consistent with international standards, including ILO Convention 169 and UN Declaration on the Rights of Indigenous Peoples. Alcoa has an Indigenous Peoples Policy:<br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy</a></p> <p>Alcoa's 2021 Sustainability Report provides further information on Alcoa's engagement approach and standards, refer to page 74:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> <p>The effectiveness of these policies and procedures are further reviewed during ASI Performance Standards Audits at location-level.</p> |
| 9.4 Free, Prior, and Informed Consent (FPIC) | Conformance | <p>Where Indigenous and other peoples with connections to land are acknowledged by governments, Alcoa's policy requires the Entity to act in accordance with all Applicable Laws as well as the principle of Free, Prior, and Informed Consent and other tenets of the International Labour Organisation (ILO) Convention No. 169 on Indigenous and Tribal Peoples, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Please refer to the Indigenous Peoples Policy:<br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy</a></p> <p>The effectiveness of these policies and procedures related to Free, Prior, and Informed Consent are further reviewed during ASI Performance Standard Audits at location-level.</p>                               |
| 9.5 Cultural and sacred heritage             | Conformance | <p>Alcoa has developed and maintains a Cultural Heritage Management Standard. This requires Alcoa locations to identify cultural heritage values and potential impacts and risks with Communities, develop a cultural heritage management plan and</p>   |

| CRITERION                                     | RATING      | COMMENT   |
|---|-------------|---|
|   |             | <p>ensure the Community can access places of significance so traditions can be maintained. For further information, please refer to the Alcoa 2021 Sustainability Report, page 74:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> <p>Alcoa's locations with the most direct impact on Indigenous and land-connected peoples are operations in Australia, the Juruti mine in Brazil, and Alcoa's former mining and refining operations in Suriname which is outside of the scope of Alcoa's Performance Standard certification.</p>  |
| 9.6a Resettlements (avoid or minimise)        | Conformance | <p>Alcoa has disclosed in the 2021 Sustainability Report, against GRI disclosure MM9, on page 176 that no Resettlements took place during 2020:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p>  |
| 9.6b Resettlements (where unavoidable)        | Conformance | <p>Alcoa has disclosed in the 2021 Sustainability Report, against GRI disclosure MM9, on page 176 that no Resettlements took place during 2020:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p>  |
| 9.7a Local Communities (rights and interests) | Conformance | <p>Alcoa has implemented the Social Policy and updated the Indigenous Peoples Statement to an Indigenous Peoples Policy, to incorporate Community rights and interests. Refer to the following links:<br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/social-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/social-policy</a><br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy</a></p> <p>Alcoa is implementing Policies via its social performance management system, covering social performance, Human Rights, Indigenous and land-connected Peoples, and cultural heritage management.</p> <p>For a summary of Alcoa's location-specific Stakeholder issues and actions, please refer to the 2021 Sustainability Report, pages 60-70:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> |
| 9.7b Local Communities (impacts)              | Conformance | <p>Alcoa has a Stakeholder Engagement Process that requires all locations to conduct assessments on issues of concerns to Local Communities. Stakeholder engagement is part of Alcoa's Human Rights Due Diligence process, where individuals are</p>  |

| CRITERION                                 | RATING      | COMMENT   |
|---|-------------|---|
|   |             | <p>given the opportunity to provide input on their relationship with the company and the functioning of established grievance mechanisms. Any Stakeholder may raise issues or lodge a grievance using Alcoa's confidential Integrity Line. For further information on issues raised during the 2020-21 period and Alcoa's mitigation actions, please refer to the 2021 Sustainability Report, pages 60-70:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p>   |
| 9.7c Local Communities (livelihoods)      | Conformance | <p>The Entity has developed a Strategic Social Investment Guidance Note and a Community Development Guidance Note to help Alcoa locations identify opportunities with the Communities to support their own goals.</p> <p>The Alcoa Foundation supports Communities through investments in environmental and social/educational initiatives. For further information, refer to the 2021 Sustainability Report, page 70:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> <p>Investments via the Alcoa Foundation are disclosed on page 54. The Alcoa Foundation 2021 Annual Report is available:<br/> <a href="https://www.alcoa.com/foundation/en">https://www.alcoa.com/foundation/en</a></p>  |
| 9.8 Conflict-Affected and High-Risk Areas | Conformance | <p>Alcoa has implemented Trace International's TRAC Program and engages with Trace International to support their due diligence program and further manage risk in the supply chain related to Bribery and Corruption, trade compliance, Child and Slave Labour, criminal history, human trafficking and conflict minerals. This program assesses suppliers with an Alcoa spend greater than USD50,000 per annum where they are based in a high-risk country, as well as those with an Alcoa spend above US\$1 million per year in any location. .</p> <p>Alcoa's Supplier Standards and Standard Terms and Conditions further describe Alcoa's expectations from suppliers. Please refer to the 2021 Sustainability Report, page 102:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> <p>Alcoa currently has no operations in areas of active conflict.</p> |
| 9.9 Security practice                     | Conformance | <p>Alcoa joined the Voluntary Principles on Security and Human Rights in March 2022. Alcoa continues to further enhance human rights practices through</p>  |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
|  |                | <p>implementation of its Human Rights Standard. For further information, refer to Alcoa Australia's Modern Slavery Statement:<br/> <a href="https://www.alcoa.com/australia/en/pdf/Alcoa-Modern-Slavery-Statement.pdf">https://www.alcoa.com/australia/en/pdf/Alcoa-Modern-Slavery-Statement.pdf</a><br/> and the 2021 Sustainability Report, page 74:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p>   |
| PRINCIPLE 10 LABOUR RIGHTS   |                |   |
| 10.1a Freedom of Association and Right to Collective Bargaining (freedom of association) | Conformance    | <p>Alcoa has implemented a Human Rights Policy which includes respect of an employees' right to join and to form or not to join a Labour Union without fear of reprisal, intimidation or harassment:<br/> <a href="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/human-rights-policy</a><br/> Where employees are represented by a legally recognised union, Alcoa is committed to establishing a constructive dialogue with their freely chosen representatives. Alcoa is committed to bargaining in good faith with such representatives.<br/> The implementation of the Policy is further reviewed during ASI Performance Standard Audits at location-level.</p>  |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)  | Conformance    | <p>Alcoa has implemented a Human Rights Policy which includes respect of an employees' right to join and to form or not to join a Labour Union without fear of reprisal, intimidation or harassment:<br/> <a href="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/human-rights-policy</a><br/> Where employees are represented by a legally recognised union, Alcoa is committed to establishing a constructive dialogue with their freely chosen representatives. Alcoa is committed to bargaining in good faith with such representatives.<br/> Labour and Collective Bargaining agreements define the process at each Alcoa location where applicable. The implementation of this policy is further reviewed during ASI Performance Standard Audits at location-level.</p> |
| 10.1c Freedom of Association and Right to Collective Bargaining (alternative means)      | Not Applicable | <p>This Criterion is not applicable as Alcoa's ASI Performance Standard Certified locations are not in countries where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.</p>  |
| 10.2a Child Labour (minimum age)   | Conformance    | <p>Alcoa has implemented hiring practices that conform with the International Labour Organization (ILO) conventions for minimum age and Child Labour as</p>   |

| CRITERION                               | RATING      | COMMENT   |
|---|-------------|---|
|   |             | <p>described in the Human Rights Policy and the Code of Conduct and Ethics:<br/> <a href="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/human-rights-policy</a><br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</a></p>   |
| 10.2b Child Labour (hazardous)          | Conformance | <p>Alcoa has implemented the Code of Conduct and Ethics which prohibits the use of Child Labour. The Entity requires compliance with all local Applicable Laws relating to hiring children at all of its locations and does not employ children or support the use of Child Labour. Alcoa encourages the creation of educational, training or apprenticeship programs tied to formal education for young people.</p>  |
| 10.2c Child Labour (worst forms)        | Conformance | <p>Alcoa has implemented the Code of Conduct and Ethics which prohibits the use of Child Labour. Alcoa does not engage in or support the Worst Forms of Child Labour. The Entity requires compliance with all local Applicable Laws relating to hiring children at all of its locations. Alcoa encourages the creation of educational, training or apprenticeship programs tied to formal education for young people.</p>   |
| 10.3a Forced Labour (human trafficking) | Conformance | <p>Alcoa is committed to abiding by international Human Rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights. Where local law conflicts with the principles contained in Alcoa's Human Rights Policy, Alcoa complies with local requirements while, at the same time, seeking ways to uphold the principles set forth in the Human Rights Policy.</p> <p>Alcoa's Human Rights Policy sets out the prohibition of Forced Labour and Human Trafficking.</p> <p>Alcoa of Australia Limited has published a Modern Slavery Report:<br/> <a href="https://www.alcoa.com/australia/en/pdf/Alcoa-Modern-Slavery-Statement.pdf">https://www.alcoa.com/australia/en/pdf/Alcoa-Modern-Slavery-Statement.pdf</a></p> <p>No incidents of modern slavery were identified in Alcoa's Australian operations or supply chains in the reporting period.</p> <p>Alcoa's Supplier Standards require suppliers to meet Alcoa's expectations on Forced Labour:</p> |

| CRITERION   | RATING      | COMMENT   |
|---|-------------|---|
|   |             | <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards</a>   |
| 10.3b Forced Labour (deposits, fees, advances)                            | Conformance | <p>Alcoa does not require any form of deposit, Recruitment Fee or equipment advance from Workers either directly or through employment or recruitment agencies. Suppliers and agencies providing temporary Workers are subject to Alcoa's Supply Chain Due Diligence procedure. A sample of EcoVadis assessments for temporary worker agencies were reviewed during the audit.</p>  |
| 10.3c Forced Labour (migrant workers)                                     | Conformance | <p>Alcoa does not require Migrant Workers to lodge deposits or security payments at any time and requires its suppliers to maintain the same standard as per its Supplier Standards. Alcoa regularly conducts supply chain assessments to ensure Alcoa is not directly or indirectly (through subcontractors) contributing to modern slavery and other human rights violations. Information on its Supplier Sustainability Program is disclosed in the 2021 Sustainability Report, page 108:</p> <p><a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> |
| 10.3d Forced Labour (debt bondage)  | Conformance | <p>Alcoa does not hold Workers in Debt Bondage or force them to work in order to pay off a debt and requires its suppliers to maintain the same standard as per its Supplier Standards. There is no requirement in any Alcoa collective labour agreement or employee handbook that requires employees to work to pay off debt.</p> <p>Alcoa regularly conducts supply chain assessments to ensure Alcoa is not directly or indirectly (through subcontractors) contributing to modern slavery and other human rights violations.</p>  |
| 10.3e Forced Labour (freedom of movement)                                 | Conformance | <p>The Alcoa Human Rights Policy and Code of Conduct both prohibit the use of Forced Labour. There is no prohibition in any collective bargaining and labour agreement or employee handbook that restricts the movement of employees in any manner. Alcoa regularly conducts supply chain assessments to ensure Alcoa is not directly or indirectly (through subcontractors) contributing to modern slavery and other human rights violations.</p>  |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | <p>Alcoa does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates and has set expectations to its suppliers to require the same in its Supplier</p>   |

| CRITERION   | RATING      | COMMENT  |
|---|-------------|--|
|   |             | Standards. Alcoa regularly conducts supply chain assessments to ensure Alcoa is not directly or indirectly (through subcontractors) contributing to modern slavery and other human rights violations.  |
| 10.3g Forced Labour (freedom to terminate employment) | Conformance | Alcoa does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length and requires suppliers to commit to the same in its Supplier Standards. Alcoa regularly conducts supply chain assessments to ensure Alcoa is not directly or indirectly (through subcontractors) contributing to modern slavery and other human rights violations.  |
| 10.4 Non-Discrimination                               | Conformance | <p>The Entity has established and implemented global Policies including the Equal Employment Opportunity Policy, Code of Conduct and Ethics, and Human Rights Policy which state the commitment and approach to Non-Discrimination and the expectations for all businesses Alcoa operates. Additional policies may exist at the country or location level to comply with their legal requirements.</p> <p>Equal Employment Opportunity Policy:<br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/equal-employment-opportunity">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/equal-employment-opportunity</a></p> <p>Code of Conduct and Ethics:<br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</a></p> <p>Human Rights Policy:<br/> <a href="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/human-rights-policy</a></p> <p>Employees can use the confidential Integrity Help Chain, which includes: reporting issues to a supervisor, team leader or another member of management, Human Resources, the Legal Department, Alcoa Integrity Champion, Ethics and Compliance, the Integrity Line, or the Alcoa Global Crisis Hotline.</p> <p>Alcoa has implemented engagement practices to support diversity groups such as the Alcoa Woman's Network (AWN) and 'Alcoans' Working Actively for Racial-Ethnic Equality (AWARE). For further detail, refer to the 2021 Sustainability Report, page 81-84:<br/> <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> |
| 10.5 Communication and engagement                     | Conformance | Grievance processes and communication procedures are regulated in local collective bargaining agreements.  |

| CRITERION                              | RATING      | COMMENT   |
|--|-------------|---|
|  |             | <p>Alcoa has established structures and procedures to freely communicate about issues or requests for information regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment, in line with Alcoa's Values. Alcoa has implemented a global employee survey to establish a baseline to monitor for progress. For further detail, refer to the 2021 Sustainability Report, page 85.</p> <p>Employees can use the confidential Integrity Help Chain, which includes: reporting issues to a supervisor, team leader or another member of management, Human Resources, the Legal Department, Alcoa Integrity Champion, Ethics and Compliance, the Integrity Line, or the Alcoa Global Crisis Hotline.</p> |
| 10.6 Disciplinary practices            | Conformance | <p>Alcoa has implemented the Code of Conduct and Ethics which has established the expectation for workplaces to be free from harassment, bullying, and offensive or disrespectful conduct. The Code established processes for speaking up and reporting issues:</p> <p><a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</a></p> <p>Alcoa conducts face-to-face training for hourly employees and online training for salaried employees.</p>   |
| 10.7a Remuneration (living wage)       | Conformance | <p>Collective Bargaining Agreements establish the Remuneration policies for unionised Workers and there is a process implemented for fair and competitive wages for non-unionised employees. Each Entity conducts benchmarking of payments to ensure wages are in line with market rates. The effectiveness of these policies is further reviewed during ASI Performance Standard Audits at location-level.</p>   |
| 10.7b Remuneration (method of payment) | Conformance | <p>Alcoa has implemented a Human Rights Policy which establishes the compensation of employees relative to the industry and local labour market and the commitment to paying employees a living wage. Alcoa's compensation philosophy is communicated to employees and each Entity operates in compliance with applicable wage, work hours, Overtime and benefits laws. The effectiveness of these policies is further reviewed during ASI Performance Standard Audits at location-level.</p>   |



| CRITERION         | RATING      | COMMENT  |
|-------------------|-------------|--|
| 10.8 Working Time | Conformance | <p>Alcoa's Working Time practices comply with national law and applicable collective agreements, as provided in Alcoa's Human Rights Policy: <a href="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/human-rights-policy</a></p> <p>The effectiveness of these policies is reviewed at ASI Performance Standard Audits at Alcoa locations. Alcoa has implemented the Flexibility First Initiative which allows for hybrid and flexible working arrangements. For further detail, refer to the 2021 Sustainability Report, page 85: <a href="https://www.alcoa.com/sustainability/en/flipbook/index.html">https://www.alcoa.com/sustainability/en/flipbook/index.html</a></p> |

PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

|   |                |  |
|---|----------------|--|
| 11.1a Occupational Health and Safety (OH&S) Policy (policy)                       | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)         | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards) | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)    | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 11.2 OH&S Management System   | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 11.3 Employee engagement on health and safety                                     | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |
| 11.4 OH&S performance   | Not Applicable | This Criterion is not applicable to the Entity as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. |

**Document Control and Version History**

| Revision | Date           | Notes  |
|----------|----------------|--|
| 0        | 23 August 2022 | Initial Certification Audit - Full Certification |