
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOA PORTLAND ALUMINIUM

CERTIFICATE
NUMBER

273

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

17 APRIL 2023

DATE OF EXPIRY

16 APRIL 2026

CERTIFIED SINCE

17 APRIL 2023

AUTHORISED BY

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

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

CERTIFICATION SCOPE

The Alcoa Portland aluminium smelter in south-western Victoria, Australia. Facilities and activities include aluminium smelting, casthouse and administration.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

| | |
|-------------------------|---|
| MEMBER NAME | Alcoa Corporation |
| ENTITY NAME | Alcoa Portland Aluminium |
| CERTIFICATION SCOPE | The Alcoa Portland aluminium smelter in south-western Victoria, Australia. Facilities and activities include aluminium smelting, casthouse and administration. |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none">Aluminium SmeltingCasthouses |
| ASI STANDARD | <ul style="list-style-type: none">Performance Standard V2 |
| AUDIT TYPE | <ul style="list-style-type: none">Certification Audit |
| AUDIT FIRM | DNV Business Assurance Services UK Ltd. |
| AUDIT DATE | <ul style="list-style-type: none">14 – 17 November 2022 |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">14 March 2023 |
| AUDIT SCOPE | <p>The audit scope includes the Alcoa Portland aluminium smelter in south-western Victoria, Australia. Facilities include aluminium smelting, casthouse and administrative associated facilities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant criteria in the ASI Performance Standard were included in the audit scope</p> |
| AUDIT OUTCOME | <ul style="list-style-type: none">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

17 April 2023 – 16 April 2026

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

16 October 2024

CERTIFICATE
NUMBER

273

SUMMARY OF FINDINGS

| CRITERION | RATING | COMMENT |
|--|-------------|---|
| PRINCIPLE 1 BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | The Entity has implemented the appropriate systems required to maintain awareness, ensure compliance with Applicable Laws, and maintain a context-sensitive commitment to customary and/or traditional practices. |
| 1.2 Anti-Corruption | Conformance | The Entity has shown a commitment to working against Corruption in all its forms, including Extortion and Bribery. Furthermore, it has ensured that anti-corruption is tackled in ways consistent with applicable laws and prevailing/relevant international standards. Employees, suppliers, and contractors are expected to follow all Alcoa global policies and procedures and receive regular online training on the Anti-Corruption and Bribery Policy. |
| 1.3 Code of Conduct | Conformance | The Entity has a comprehensive approach to maintaining its own integrity and that of its respective stakeholders. Its Code of Conduct provides a standardized framework to guide business and operational practices. |
| PRINCIPLE 2 POLICY & MANAGEMENT | | |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | The Entity's comprehensive policies have been endorsed by senior management, have provided support to allocate adequate resources, and have undergone regular policy reviews. |
| 2.1b Environmental, Social, and Governance Policy (senior management) | Conformance | The EHS Policy is endorsed by the Plant Manager with the support of other senior managers. Checks and balances are ensured through regular conduct of both corporate and internal audits (ASAT) |
| 2.1c Environmental, Social, and Governance Policy (communication) | Conformance | The Entity communicates its EHS Policy to employees, contractors, and other stakeholders through various means such as training, document control systems, and by displaying copies in prominent locations. The policy is also available upon request to interested parties and is communicated through mandatory training with assessments among employees and contractors. The EHS policy is also available on the company website https://www.alcoa.com/australia/en/pdf/portland-aluminium-environment-health-and-safety-policy.pdf |

| CRITERION | RATING | COMMENT |
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| 2.2 Leadership | Conformance | The Entity has nominated the Plant Manager as having overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard. |
| 2.3a Environmental and Social Management Systems (environmental) | Conformance | The Entity has documented and implemented integrated environmental and social Management Systems and is ISO 14001:2015 certified. |
| 2.3b Environmental and Social Management Systems (social) | Conformance | The Entity has documented, implemented, and maintained a Social Management System. The Entity is following Alcoa's new Social Performance Management Standard and System which includes four standards (Social Performance Management Standard, Cultural Heritage Standard, Indigenous Peoples Standard and Human Rights Policy). |
| 2.4 Responsible Sourcing | Conformance | The Entity has implemented a responsible sourcing policy through their Supplier Sustainability Program that covers all environmental, social and governance issues. The intent and commitment to sourcing responsibly is apparent and the company is in the process of codifying the same in the form of a Global Supplier Sustainability Program. The Alcoa Group has implemented a comprehensive approach to ESG Due Diligence and advancement in its supply chain, which includes the use of various frameworks, policies, and procedures such as the OECD Guidelines, Human Rights Management Framework, Social Management Framework, Conflict Minerals Procedure, Ethics and Compliance Process, Regional Local Supplier Policies, and Supplier Standards. |
| 2.5 Impact Assessments | Conformance | The Entity consistently conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for New Projects or Major Changes to existing Facilities. Aside from minor capital improvements like re-instatement of a potline section, the Entity has made no changes in its operations for several years. Internal procedures are in place to ensure environmental and social risk assessments relating to any new projects or major changes to existing facilities are undertaken. |
| 2.6 Emergency Response Plan | Conformance | The Entity has a documented Emergency Response Plan developed in consultation with the community. There are emergency drills in each area with the frequency depending on risk. There is |

| CRITERION | RATING | COMMENT |
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| | | also training on the emergency response in high risk areas. |
| 2.7 Mergers and Acquisitions | Conformance | The Entity reviews all environmental, social, and governance issues in the corporate Due Diligence process as prescribed by its parent company for mergers and acquisitions. |
| 2.8 Closure, Decommissioning and Divestment | Conformance | The Entity reviews all environmental, social and governance issues in the planning process for any closure, decommissioning and divestment within their Facilities. |
| PRINCIPLE 3 TRANSPARENCY | | |
| 3.1 Sustainability Reporting | Conformance | The Entity publicly discloses its governance approach and its material environmental, social and economic impacts in the published annual and sustainability reports of the Entity's parent company Alcoa. The 2021 Sustainability Report is available at: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf |
| 3.2 Non-compliance and liabilities | Conformance | The Entity publicly discloses information on any significant fines, judgments, penalties and non-monetary sanctions for any non-compliance with Applicable Law. |
| 3.3a Payments to governments (legal and contractual) | Conformance | Consistent with its compliance to Anti-Corruption criterion, the Entity has a sound framework through which to ensure all relevant customs fees and legal payments are made to the government. Payments to all government agencies and officials are covered by corporate policies and monitored by an external solutions provider. |
| 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 | Community complaints and grievances are recorded and managed through the Entity's Community Consultation System. When necessary, information about community complaints and grievances are reported to the Entity's Lead Team through the site lead team or other channels. The Entity also has regular meetings across departments to address environmental, health and safety related grievances and issues, with the aim of finding solutions. |
| PRINCIPLE 4 MATERIAL STEWARDSHIP | | |

| CRITERION | RATING | COMMENT |
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| 4.1a Environmental Life Cycle Assessment (life cycle impacts) | Minor Non-Conformance | The Entity currently evaluates the life cycle impacts of its major product lines using the International Aluminium Institute's Life Cycle Assessment (LCA) program, however it has yet to complete the LCA for its own Product(s). This is currently being finalised by a third-party consultant. |
| 4.1b Environmental Life Cycle Assessment (cradle to gate) | Minor Non-Conformance | The Entity currently evaluates the life cycle impacts of its major product lines using the International Aluminium Institute's Life Cycle Assessment (LCA) program, however it has yet to complete the LCA for its own Product. This is currently being finalised by a third-party consultant. |
| 4.1c Environmental Life Cycle Assessment (public communication) | Conformance | Customers and other stakeholders may access IAI-LCA publications for the time being, while the Entity's own LCA is being completed. |
| 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 processes/work instructions are designed to ensure that all Aluminium, including that found in Dross, is recovered and remelted, maximizing resource efficiency and reducing waste. These processes/work instructions pertain to daily management and scrap tracking system and monitoring and actioning of equipment reliability to minimize scrap generation. |
| 4.3b Aluminium Process Scrap (alloy separation) | Conformance | The Entity has established strict safeguards to limit external Aluminium scrap from entering the plant. All Aluminium Process Scrap that are being recycled are generated internally. |
| 4.4a Collection and recycling of products at end-of-life (strategy) | Conformance | The Entity initiates strategies to advance recycling activities with specific targets and timelines. At a corporate level, Alcoa encourages End of Life recycling through global recycling activities since they have very little influence on End of Life consumer scrap as all their Facilities are very far from end consumers of Aluminium. Aside from regular financial contribution to recycling initiatives, the Entity has patented a technology to purify low-value automotive scrap to encourage more intensified recycling and more efficient use of energy. |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance | The Entity facilitates engagement activities with stakeholders that advance collection and recycling |

| CRITERION | RATING | COMMENT |
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| | | systems and increase recycling rates of products containing Aluminium. |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS | | |
| 5.1 Disclosure of GHG emissions and energy use | Conformance | <p>The Entity has taken the appropriate steps to ensure that organisational Greenhouse Gas (GHG) emissions are effectively accounted, reported, and disclosed. The National Greenhouse and Energy Reporting (NGER) scheme is the Australian Government's reporting scheme for monitoring GHG emissions and energy consumption. Emissions and energy data is reported to this regulator via the Emissions and Energy Reporting System (EERS) and some of this information is publicly available on the NGERs website: https://www.cleanenergyregulator.gov.au/NGER/National%20greenhouse%20and%20energy%20reporting%20data/Corporate%20emissions%20and%20energy%20data/corporate-emissions-and-energy-data-2021-22</p> |
| 5.2 GHG emissions reductions | Conformance | <p>The Entity intends to reduce GHG emissions and communicates specific plans to achieve this. Increasing renewable electricity will be an important mechanism to achieve these plans. The smelter also provides grid services which are important for stabilising Victoria's electricity grid with increasing renewables.</p> <p>Further discussions on the Entity's Decarbonization Strategy are found in the Alcoa Sustainability Report 2021 on page 128: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p> |
| 5.3a Aluminium Smelting (management system) | Conformance | <p>The Entity recognizes that Aluminium Smelting presents a carbon intensive process for the organization to abate emissions from. As a result, the Entity uses its ISO certified EMS and Environmental Improvement Plans to evaluate operational procedures and limit direct emissions where feasible, such as furnace operations, pot start up, and pot operating procedures.</p> |
| 5.3b Aluminium Smelting (up to and including 2020) | Conformance | <p>The Entity's forecasted Scope 1 and Scope 2 GHG emissions from the production of Aluminium is below 8 tonnes CO₂-eq per metric tonne Aluminium by 2030.</p> |
| 5.3c Aluminium Smelting (after 2020) | Not Applicable | <p>This Criterion is not applicable as the Entity has no plans to commission new Aluminium Smelting Facilities after 2020 at the Entity.</p> |

| CRITERION | RATING | COMMENT |
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| PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE | | |
| 6.1 Emissions to Air | Conformance | The Entity has established multiple procedures to quantify and report Emissions to Air that have adverse effects on humans or the environment and has implemented initiatives to minimize these adverse impacts. The Entity performs a health risk assessment to assess the potential impact of the emissions on public health. Monitoring is carried out in accordance with the requirements set by the National Association of Testing Authorities (NATA), and there is a schedule in place for conducting the monitoring, which is specified in the environmental monitoring manual. An environmental risk assessment relating to air emissions has been undertaken for the smelter site to enable the development of a risk-based air monitoring program and show compliance against license conditions. |
| 6.2 Discharges to Water | Conformance | The Entity has established multiple procedures to quantify and report Discharges to Water that have adverse effects on humans or the environment and has implemented initiatives to minimise these adverse impacts, as outlined in the Environmental Improvement Plans. |
| 6.3a Assessment and Management of Spills and Leakage (assessment) | Conformance | The Entity appropriately assesses, mitigates and manages its potential spills and leakages. The Entity understands its major risk areas and has ensured that all external communications plans, stakeholder guidelines, compliance controls and monitoring programs work in tandem to detect and mitigate spills and/or leakages. |
| 6.3b Assessment and Management of Spills and Leakage (management) | Conformance | The Entity appropriately assesses, mitigates and manages its potential spills and leakages. The Entity understands its major risk areas and has ensured that all external communications plans, stakeholder guidelines, compliance controls and monitoring programs work in tandem to detect and mitigate spills and/or leakages. |
| 6.4a Reporting of Spills (immediate disclosure) | Conformance | The Entity has taken appropriate measures to ensure that any spills are immediately and effectively reported and that an effective incident response plan is ready to be mobilised. Periodic incident reporting as mandated by regulators is used to communicate and publicly disclose spills and the remediation actions taken. |
| 6.4b Reporting of Spills (regular reporting) | Conformance | The Entity has taken the appropriate measures to ensure that any spills are immediately and |

| CRITERION | RATING | COMMENT |
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| | | effectively reported and that an effective incident response plan is ready to be mobilised. Periodic incident reporting as mandated by regulators is used to communicate and publicly disclose spills as well as the remediation actions taken. |
| 6.5a Waste management and reporting (strategy) | Conformance | The Entity has considered how best to implement a waste management strategy that integrates principles from the Waste Mitigation Hierarchy. This is reflected in the Entity's Waste Management Manual. |
| 6.5b Waste management and reporting (disclosure) | Conformance | The Entity has taken the appropriate steps to quantify the amount of both Hazardous and Non-Hazardous Waste generated across operations and publicly disclosed the information in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf |
| 6.6a Bauxite Residue (storage construction) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.6b Bauxite Residue (integrity checks and controls) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.6c Bauxite Residue (water discharge) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.6d Bauxite Residue (marine and aquatic environments) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.6e Bauxite Residue (start of the art technologies) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.6f Bauxite Residue (remediation) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7a Spent Pot Lining (SPL) (storage and management) | Conformance | The Entity has implemented a Spent Pot Lining (SPL) management plan as part of its operational standards, and this offers guidance on how SPL is expected to be stored and managed. Moreover, along with the Waste Management Manual, the Entity has initiated processes to recover and recycle carbon and refractory materials. It has also mitigated untreated SPL to landfill and/or water sources. |
| 6.7b Spent Pot Lining (SPL) (recovery and recycling) | Conformance | The Entity has optimised processes for the recovery and recycling of SPL. A contract is in place with an external recycler, and the Entity sends SPL for treatment. |

| CRITERION | RATING | COMMENT |
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| 6.7c Spent Pot Lining (SPL) (Untreated SPL) | Conformance | As per the Entity's SPL Management Guidelines and Standards (2020), the Worldwide SPL Lead Team reviews all proposed SPL treatment technologies against current acceptable performance standards and potential downstream adverse environmental impacts. Effective treatment processes may be utilised to render SPL safe for disposal in double or composite lined land disposal units. Treatment technologies are carefully reviewed to ensure proper management and minimize releases of hazardous constituents to the environment from air emissions, water discharge, and/or treatment residue. |
| 6.7d Spent Pot Lining (SPL) (review of alternatives) | Conformance | As per Entity's SPL Management Guidelines and Standards (2020), the Worldwide SPL Lead Team reviews all proposed SPL treatment technologies against current acceptable performance standards and potential downstream adverse environmental impacts. Effective treatment processes may be utilised to render SPL safe for disposal in double or composite lined land disposal units. Treatment technologies are carefully reviewed to ensure proper management and minimize releases of hazardous constituents to the environment from air emissions, water discharge, and/or treatment residue. |
| 6.7e Spent Pot Lining (SPL) (marine and aquatic environments) | Conformance | The Entity utilises onsite designated storage buildings/containers to store SPL prior to recycling. No discharge to marine or aquatic environments occurs. |
| 6.8a Dross (recovery) | Conformance | The Entity limits Dross residue exposure to the environment. Consistent with the Waste Management Manual, the Entity has established a framework that maximises the recycling of treated Dross and demonstrates a regular commitment to finding alternative options through which to treat, manage dross waste, and divert them from landfill. |
| 6.8b Dross (recycling) | Conformance | The Entity limits Dross residue exposure to the environment. Consistent with the Waste Management Manual, the Entity has established a framework that maximises the recycling of treated Dross and demonstrates a regular commitment to finding alternative options through which to treat, manage dross waste, and divert them from landfill. |
| 6.8c Dross (review of alternatives) | Conformance | Consistent with the Waste Management Manual, the Entity demonstrates a regular commitment to |

| CRITERION | RATING | COMMENT |
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| | | finding alternative options through which to treat, manage dross waste, and divert them from landfill. |
| PRINCIPLE 7 WATER STEWARDSHIP | | |
| 7.1a Water assessment (mapping) | Conformance | The Entity has mapped and quantified its water withdrawal and use by source and type. |
| 7.1b Water assessment (risk assessment) | Conformance | A water discharge risk assessment has been completed for the Entity, with an active water monitoring program in place. A water scarcity risk assessment has been completed for the Entity and they are not considered as a water scarcity site. |
| 7.2a Water management (management plans) | Conformance | The Entity has a functioning water management plan with time-bound targets that address the material risks identified in the water risk assessment. |
| 7.2b Water management (monitoring) | Conformance | The Entity monitors the effectiveness of their water stewardship plan annually around key water use reduction and discharge water quality targets. |
| 7.3 Disclosure of water usage and risks | Conformance | The Entity discloses water withdrawal and use and material water-related risks in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf |
| PRINCIPLE 8 BIODIVERSITY | | |
| 8.1 Biodiversity assessment | Conformance | To assess the environmental risk, the Entity uses the aspects and impacts approach per ISO 14001 certification requirements. There is a specific Biodiversity risk assessment in the Entity's 'Biodiversity Action Plan Land Management 2022'. |
| 8.2a Biodiversity management (biodiversity action plans) | Conformance | The Entity's 'Biodiversity Action Plan Land Management 2022' considers issues within the smelters sphere of influence. Including but not limited to feral animals, biodiversity knowledge/information, fauna and flora management for species of significance. koala, spider orchid, emu wren and macropods, and other values, heathland and cultural heritage. A key issue is koala management and a specific Koala Management Plan to develop more plantations further away and log the trees that are too close to the plant and impacted by fluoride from the plant. The plan acknowledges that the Relocation of koalas is a notoriously difficult task |

| CRITERION | RATING | COMMENT |
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| | | (approval is required by the regulator) and there is wide and ongoing consultations with stakeholders on the proposed approach. More information is available at: https://www.alcoa.com/australia/en/news/releases?id=2022/06/portland-aluminium-to-plant-trees-for-koala-habitat&year=y2022 |
| 8.2b Biodiversity management (consultation and mitigation hierarchy) | Conformance | The 'Biodiversity Action Plan Land Management 2022' emphasises the Biodiversity Mitigation hierarchy. As an example, there is a complex three point plan to mitigate the impacts of fluoride on local koala populations. |
| 8.2c Biodiversity management (reporting) | Conformance | The most significant biodiversity issue is koala management. The operations have conducted extensive consultation on the matter, sharing key outcomes of the plan's actions. This was confirmed through stakeholder interviews. |
| 8.3 Alien Species | Conformance | The 'Biodiversity Action Plan Land Management 2022' considers issues of feral animals and weed management. The emphasis of the approach is on treatment and control of weeds that are already established in the area. |
| 8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines) | Not Applicable | This Criterion is not applicable to the Entity's certification scope. |
| 8.4b Commitment to "No Go" in World Heritage properties (existing operations) | Not Applicable | This Criterion is not applicable to the Entity's certification scope. |
| 8.5a Mine rehabilitation (best available techniques) | Not Applicable | This Criterion is not applicable to the Entity's certification scope. |
| 8.5b Mine rehabilitation (financial provisions) | Not Applicable | This Criterion is not applicable to the Entity's certification scope. |
| PRINCIPLE 9 HUMAN RIGHTS | | |
| 9.1a Human Rights Due Diligence (policy) | Conformance | The Entity has implemented the Alcoa Global Human Rights Policy, available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf |
| 9.1b Human Rights Due Diligence (process) | Conformance | A Human Rights Due Diligence Process was implemented to identify potential risks and implement actions to eliminate or minimize risks. The scope involved the identification of risks and |

| CRITERION | RATING | COMMENT |
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| | | impacts, remediation, grievance mechanism, reporting and feedback, on the following topics: working and labour conditions, safety, land management, integrity, health, safety and environment, relationships with communities, suppliers and customers. The Human Rights Impact Assessment contains action plans in a number of areas. |
| 9.1c Human Rights Due Diligence (remediation) | Conformance | In the Human Rights Due Diligence completed in 2022, no adverse impacts have been identified by the Entity. |
| 9.2 Women's Rights | Conformance | Policies and processes to ensure respect for the rights and interests of women are place. Targets for gender diversity have been exceeded. Worker interviews with female workers confirmed there is no Discrimination. |
| 9.3 Indigenous Peoples | Conformance | Indigenous rights and culture are well established in the Portland area and recognised as having retained unbroken connections unlike other Victorian Aboriginal groups. Respecting Indigenous rights and culture are outlined in the Entity's Indigenous Peoples Policy (V1 February 2021). Policies are implemented as part of the Reconciliation Action Plan July 2022 to July 2024. There are action plans in the area of relationships, respect, opportunities and governance. Interviews with local Indigenous Representatives confirmed the relationship is very respectful between Entity staff and Traditional Owners. |
| 9.4 Free, Prior, and Informed Consent (FPIC) | Conformance | There is no new development planned by the Entity, however it has an established process to consult and cooperate in good faith with the Indigenous Peoples on a wide range of issues. This was confirmed by interviews with Traditional Owners. |
| 9.5 Cultural and sacred heritage | Conformance | The Entity has been in operation since the 1980s and the site has a static operational 'footprint'. There are no known cultural values within the Entity's Area of Influence. The Entity has an established process to consult and cooperate in good faith with the Indigenous Peoples should sites or artefacts be identified in future. |

| CRITERION | RATING | COMMENT |
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| 9.6a Resettlements (avoid or minimise) | Not Applicable | This Criterion is not applicable as there are no projects where physical displacement of Communities or people are necessary or relevant. |
| 9.6b Resettlements (where unavoidable) | Not Applicable | This Criterion is not applicable as there are no projects where physical displacement of Communities or people are necessary or relevant |
| 9.7a Local Communities (rights and interests) | Conformance | <p>Social Management Plans and a social performance scorecard are in place to address community and stakeholder engagement. The plan includes a baseline measurement via a 'Community Perception and Reputation Survey'. From this there is a scorecard for 'Key Social Performance Indicators'.</p> <p>Community stakeholder interviews confirmed that the Entity demonstrated that they respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources.</p> |
| 9.7b Local Communities (impacts) | Conformance | The Entity's Social Management Plans include appropriate steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities. Local Council stakeholders revealed that the Entity actively works with Councils and have adopted Council priorities for education and especially Indigenous education. |
| 9.7c Local Communities (livelihoods) | Conformance | The Entity's Social Management Plans include opportunities to respect and support livelihoods in the Local Community. Interviews with Council officials revealed that the Entity is held in high regard especially recently for increased employment and efforts to improve gender balance. |
| 9.8 Conflict-Affected and High-Risk Areas | Conformance | There was no evidence found of contribution to armed conflict or human rights abuses. Companies traded with are not listed as within a Conflict-Affected and High-Risk Areas (CAHRA). The Supplier approval programme included a third party check which involved a variety of metrics related to CAHRA and a corrective action strategy if these are not met. |
| 9.9 Security practice | Conformance | Public and private security providers respect Human Rights in line with recognised standards and good practices. All contractors are provided regular training on security practices including training on respecting Human Rights. |

| CRITERION | RATING | COMMENT |
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| 10.1a Freedom of Association and Right to Collective Bargaining (freedom of association) | Conformance | <p>The Entity's Human Rights Policy and Code of Conduct both demonstrate the Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and allow for joining Workers' councils. Refer to:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p> <p>Employee interviews confirmed that there is complete Freedom of Association on site.</p> |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining) | Conformance | Interviews with workers and managers on site confirm that the Entity respects the rights of Workers to Collective Bargaining, and participate in any Collective Bargaining process. |
| 10.1c Freedom of Association and Right to Collective Bargaining (alternative means) | Not Applicable | This Criterion is not applicable as Applicable Law in Australia does not restrict the right to Freedom of Association and Collective Bargaining. |
| 10.2a Child Labour (minimum age) | Conformance | Whilst there are employees under 18 on site, there are none under 16. The Entity's Policy only allows this for apprentices under the Vocational Training Act. There is an age validation process kept on the employee file. |
| 10.2b Child Labour (hazardous) | Conformance | The Entity's Human Rights Policy confirms that the hiring practices conform to the International Labour Organization (ILO) conventions for minimum age and Child Labour and applicable local laws. In Victoria the restrictions for child labour are set by the Child Employment Act. |
| 10.2c Child Labour (worst forms) | Conformance | The Entity's Human Rights Policy confirms that the hiring practices conform to the International Labour Organization (ILO) conventions for minimum age and Child Labour and applicable local laws. In Victoria the restrictions for child labour are set by the Child Employment Act. |
| 10.3a Forced Labour (human trafficking) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators for forced Labour. Visa checks are also undertaken by the Entity as required. |

| CRITERION | RATING | COMMENT |
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| 10.3b Forced Labour (deposits, fees, advances) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators for forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3c Forced Labour (migrant workers) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators for forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3d Forced Labour (debt bondage) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators for forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3e Forced Labour (freedom of movement) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators for forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators for forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3g Forced Labour (freedom to terminate employment) | Conformance | The Freedom of Association requirements of the Fair Work Act.2009 (Commonwealth) means that the Clauses relating to termination of employment are binding for Migrant Workers. Employee interviews confirmed that there is complete freedom of association and that there is no Forced Labour. |
| 10.4 Non-Discrimination | Conformance | The Entity has implemented the Alcoa global Equal Opportunity Policy: https://www.alcoa.com/global/en/who-we- |

| CRITERION | RATING | COMMENT |
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| | | <p>are/ethics-compliance/equal-employment-opportunity#:~:text=Individuals%20must%20be%20treated%20fairly,policies%20and%20code%20of%20conduct</p> <p>There are three Entity-wide employee resource groups: the Alcoa Women's Network, AWARE (Alcoas Working Actively for Racial-Ethnic Equality) and EAGLE (Employees at Alcoa for Gay, Lesbian [Bisexual and Transgender] Equality). Each group provides information and resources, a support network and organises group activities. Worker interviews confirmed there is no discrimination.</p> |
| 10.5 Communication and engagement | Conformance | The Entity demonstrates open communication and direct engagement with Workers and their representatives. There are numerous mechanisms for Workers to raise issues. Worker interviews confirmed that Workers are aware of these processes and were comfortable with raising issues to management. |
| 10.6 Disciplinary practices | Conformance | The Entity's Code of Conduct includes nil tolerance to bullying and harassment, and gender-based issues like sexual harassment. This is reinforced by numerous policies and information posters in the plant. Worker interviews confirmed that there were no workplace issues corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. |
| 10.7a Remuneration (living wage) | Conformance | Workers interview confirmed that salaries are above award rates which are well above a living wage including labour hire and contract staff. Some labour hire arrangements are in place and these meet the requirements of the Victorian Labour Hire Act 2018. |
| 10.7b Remuneration (method of payment) | Conformance | Documentation and Workers interview confirmed that the Entity makes salary payments promptly by internet transfer, including labour hire staff and contract staff. |
| 10.8 Working Time | Conformance | Workers interviews confirms the Entity complies with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave. |

| CRITERION | RATING | COMMENT |
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| 11.1a Occupational Health and Safety (OH&S) Policy (policy) | Conformance | The Entity has its own OH&S Policy available online which has been signed and endorsed by the Smelter Manager, available at: http://alcoa.com/australia/en/pdf/portland/environmental-health-and-safety-policy |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors) | Conformance | The Entity's OH&S Policy is applied to both Workers and visitors. This was confirmed by worker interviews. The audit team was inducted in the OH&S Policy and systems at Portland. |
| 11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards) | Conformance | The Entity's OH&S Policy commits to comply with local laws, which meets or exceeds ILO Conventions 155 and 176, available at: https://www.worksafe.vic.gov.au/all-acts-and-regulations |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work) | Conformance | It was noted in worker interviews that Workers understood that they have the right to stop work for safety reasons and some had done this. Compliance with Applicable Laws is mentioned which also inter alia covers ILO requirements to which Australia is a signatory. |
| 11.2 OH&S Management System | Conformance | The Entity has developed and implemented a OH&S Management System which is independently certified to 45001:2018. |
| 11.3 Employee engagement on health and safety | Conformance | The Entity has various levels of engagement with Workers. Crews meet monthly and have a crew action plan with leading and lagging indicators, training and checks, 'Top 5' issues and crew safety projects. Each team is visited on a monthly basis. The OH&S Committee and area management meets with the OH&S representatives as a series of rolling meetings to discuss projects and issues. The health and safety representatives from each area meet to share issues that they are having to identify common issues and concerns. |
| 11.4 OH&S performance | Conformance | The Entity evaluates its Occupational Health and Safety and leading and lagging indicators are part of a weekly distribution to senior managers, a quarterly online report and regulatory reports for Worksafe Victoria. |

Document Control and Version History

| Revision | Date | Notes |
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| 0 | 17 April 2023 | Initial Certification Audit - Full Certification |