
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOA

CERTIFICATE
NUMBER

32

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

18 JULY 2019

DATE OF EXPIRY

17 JULY 2022

CERTIFIED SINCE

17 JULY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a white background.

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

CERTIFICATION SCOPE

Alcoa World Alumina (AWA) Juruti Mine including
the port, ore beneficiation and administrative
facilities.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa
ENTITY NAME	Alcoa World Alumina (AWA) Juruti Mine
CERTIFICATION SCOPE	Alcoa World Alumina (AWA) Juruti Mine including the port, ore beneficiation and administrative facilities.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite mining
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	23 – 25 April 2019
AUDIT REPORT SUBMISSION	17 May 2019
AUDIT SCOPE	<p>Alcoa World Alumina (AWA) Juruti Mine including the port, ore beneficiation and administrative facilities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Bauxite mining <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

18 July 2019 – 17 July 2022

NEXT AUDIT
TYPE

Recertification Audit

NEXT AUDIT
DUE DATE

17 July 2022

CERTIFICATE
NUMBER

32

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has established an appropriate compliance system through the formal processes of the "Foreign Corrupt Practices Act" (FCPA), leading to business enforcement as defined in the Anti-Corruption Policy revised in November 2016. As part of EHS (Environment, Health and Safety), the Entity has a system called LEGAL, from the company Scope - Sustainable Business, for the management of environment, health and safety regulatory requirements.
1.2 Anti-Corruption	Conformance	The Entity established a revised Anti-Corruption policy in 2017 approved by the CEO (Chief Executive Officer). The Anti-Corruption Policy is available at https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption.asp
1.3 Code of Conduct	Conformance	The Code of Conduct is communicated during the induction of new workers and annually through the communication platform on the company's online portal. The employees then undergo an evaluation on learnings. https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity implements and maintains environmental, social, and governance policies consistent with the practices included in the ASI standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's environmental, social, and governance policies are approved by the plant General Manager.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has established an Management System Policy, published and communicated to employees and contractors: (Juruti Integrated Management System Policy). This Policy includes Quality, Productivity and EHS aspects. For other social and governance issues, we may refer to the Global Human Rights Policy (https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp) and the Code of conduct

CRITERION	RATING	COMMENT
		<p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct.asp). The Entity's Integrated Management System Policy is also printed and publicly displayed on the main gate (which the external people can access freely) and handed to local stakeholders.</p>
2.2 Leadership	Conformance	It was evidenced that the manager of the Entity is responsible for ensuring that all ASI requirements are met at the location.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity implements a Socio-Environmental Management Program (PGSA), which was approved by the environmental licensing body, taking into account the impacts of the installation and operation, through the Environmental Impact Study and Report (EIA / RIMA) for the site.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity implements a Socio-Environmental Management Program (PGSA), which was approved by the environmental licensing body, taking into account the impacts of the installation and operation, through the Environmental Impact Study and Report (EIA / RIMA) for the site.
2.4 Responsible Sourcing	Conformance	<p>The Entity has established an adequate Responsible Sourcing Policy (Alcoa Suppliers Standards) for the evaluation of suppliers and subcontractors. The Entity's suppliers are qualified through the Due Diligence processes of TRACE and ECOVADIS, and the purchasing team have been trained on the policy of sustainable procurement and anti-corruption.</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier_Standards.pdf</p>
2.5 Impact Assessments	Conformance	The Entity conducted Impact Assessments in the area of bauxite waste, including assessments of human rights, Environmental and Social Impact. However, Significant changes have not been evidenced since Entity became a member of ASI.
2.6 Emergency Response Plan	Conformance	The Entity demonstrated the implementation of emergency response plans, including the participation of external stakeholders, performing monthly based simulations.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	The Entity has adequately defined the corporate process for mergers, acquisitions and divestitures and a strategy for entering into a new country.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has adequately defined the site closure plan containing all phases and investment required to close the site.
Principle 3 Transparency		
3.1 Sustainability Reporting	Conformance	It was evidenced that the Entity has developed and publicly communicated the Alcoa Sustainability Report for the year 2017. https://www.alcoa.com/brasil/pt/pdf/relatorios-sustentabilidade/Alcoa_RS2017.pdf https://www.alcoa.com/sustainability/en/sustainability-reports-archive.asp .
3.2 Non-compliance and liabilities	Conformance	The Entity has received no warnings or penalties regarding violations of laws, regulations or significant fines for non-compliance with applicable law.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity is subject to annual corporate audits ensuring compliance. The Entity also has provisions regarding the communication of financial results in its internal policies.
3.3b Payments to governments (disclosure – bauxite mining)	Conformance	It was evidenced that the Entity made payments to the government related to the required taxes, as demonstrated by the certificates and other federal, municipal and social security documentation, showing that the Entity is making the payments in an appropriate way. https://www.alcoa.com/brasil/pt/pdf/relatorios-sustentabilidade/Alcoa_RS2017.pdf https://investors.alcoa.com/financial-reports/annual-reports-and-proxy-statements
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity adequately implements a complaints mechanism to respond to stakeholder requests in an accessible, transparent and understandable way. Complaints and requests received from interested parties are recorded through the "Integrity line" and the Ombudsman process.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major product lines for which aluminium is

CRITERION	RATING	COMMENT
		considered or used, based on ISO 14040:2006 and ISO 14044:2006.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed the LCA for bauxite and alumina considering a cradle-to-gate approach and this is made available to customers upon request. https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity demonstrated that the information on LCAs for bauxite and alumina are available upon request; the publicly shared reports include underlying assumptions and system boundaries: https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf
4.2 Product design	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.3a Aluminium Process Scrap (targets)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	It was evidenced that the Entity publishes the report or documentation containing the Entity's annual material GHG emissions and energy use by source. https://www.registropublicodeemissoes.com.br/participantes/990
5.2 GHG emissions reductions	Conformance	The Entity is committed to addressing global climate change actions, has adequate systems for target-setting covering its material sources on an annual basis for its GHG emissions, and implements action plans to achieve these targets. Carbon dioxide represents most of Alcoa's GHG emissions, with smelters being the largest emitters. As such, Alcoa's long-term goal is to reduce the intensity of its GHG footprint (direct and indirect emissions) from smelting

CRITERION	RATING	COMMENT
		operations by 15 percent by 2025 and 20 percent by 2030 from a 2015 baseline. Alcoa achieved an 8.1 percent reduction from the baseline through 2018. Further information about Alcoa's GHG emission reduction targets and independent third-party assurance statement are available from: https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity monitors and takes actions to minimize emissions into the atmosphere that have adverse effects on humans or the environment, as reported in the company's Environmental Impact Study at Golden Associates in 2018.
6.2 Discharges to Water	Conformance	It was evidenced that the Entity evaluated all potential effluent / water reuse disposal points of the plant are mapped and periodically updated. Evidenced project to reduce effluent discharges and modernize existing treatment systems.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has appropriately conducted an assessment of the major risk areas of operations where spills and leakage may contaminate air, water and soil, according to Annex 03 to Procedure PGI-PAE-996X-0013 (Emergency Action Plan - PAE) including the Inventory of Potentially Hazardous Substances.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has defined the internal and external communication plan through Procedure PGI-PAE-996X-0013 (Emergency Action Plan - PAE).
6.4a Reporting of Spills (immediate disclosure)	Conformance	It was evidenced in the Investigation of environmental incidents procedure that objectives for establishing norms, and parameters for the investigation and correction of the causes of actual and potential

CRITERION	RATING	COMMENT
		<p>environmental incidents are implemented. The Emergency Plan lists the official institutions, affected personnel and other stakeholders around the area of influence of the Entity that must be communicated immediately, regardless of volume, at any time of the day or night and on any day of the week, by telephone and / or fax, on the pollution incident.</p> <p>https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Emergency Plan lists the official institutions, affected personnel, and other stakeholders around the area of influence of the Entity that must be reported immediately, regardless of the volume shed, at any time of day or night and any day of the week, by telephone and / or fax, on the pollution incident.</p> <p>https://www.alcoa.com/sustainability/en/pdf/2018-Sustainability-Report.pdf</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has implemented a waste management strategy in accordance with the Waste Mitigation Hierarchy. The Inventory of Industrial Solid Waste is submitted annually to the Secretary of State for Environment and Natural Resources, in accordance with CONAMA Resolution 313/2002. The Entity publicly developed and released the Alcoa Sustainability Report for the year 2017.</p> <p>https://www.alcoa.com/en/pdf/relations-sustainability/Alcoa_RS2017.pdf</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity publicly disclose, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated waste disposal methods, to the environmental agency, and also in the Alcoa Sustainability report.</p> <p>(https://www.alcoa.com/sustainability/en/pdf/2017-Sustainability-Report.pdf and local (Brazil) - https://www.alcoa.com/brasil/pt/pdf/relatorios-sustentabilidade/Alcoa_RS2017.pdf)</p>
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.

CRITERION	RATING	COMMENT
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)	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's certification scope.
6.8b Dross (recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8c Dross (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	It was evidenced that the Entity adequately mapped the use and withdrawal of water and demonstrated the appropriate water use permits.
7.1b Water assessment (risk assessment)	Conformance	The Entity assesses and monitors the risks related to water in the hydrographical basin with superficial and underground abstraction and has periodically informed the environmental agency SEMA - (Secretaria de Meio Ambiente do Pará).
7.2a Water management (management plans)	Conformance	It was evidenced that the Entity has adequately implemented a plan of hydrogeological and environmental quality studies showing that there

CRITERION	RATING	COMMENT
		is water availability to meet the consumption demands of the Entity.
7.2b Water management (monitoring)	Conformance	It was evidenced that the Entity adequately monitors the effectiveness of its water management plans.
7.3 Disclosure of water usage and risks	Conformance	That Entity reports water withdrawal from underground wells to the State Secretariat for the Environment. Water withdrawal, consumption and water related risks are also reported in the Annual Sustainability report. https://www.alcoa.com/brasil/pt/pdf/relatorios-sustentabilidade/Alcoa_RS2017.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has developed a Biodiversity Management Plan that includes the evaluation of risks and the materiality of the impacts to the biodiversity related to the activities and land use in the area of influence of the Entity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	It was evidenced that the Entity has developed an Action Plan for Biodiversity that included the evaluation of risks and the materiality of the impacts to biodiversity related to the activities and land use in the area of influence of the Entity, with the definition of goals, actions, responsibilities and a 2019 timeline.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	It was evidenced that affected personnel and external stakeholders have been consulted, informed and trained about the management plans and controls. It was evidenced that the Biodiversity Action Plan is consultative and has controls developed based on the 'mitigation hierarchy' to avoid, minimize, rehabilitate or compensate for impacts on biodiversity.
8.2c Biodiversity management (reporting)	Conformance	The Entity has developed and publicly communicated biodiversity outcomes in the Alcoa Sustainability Report for the year 2017. https://www.alcoa.com/en/pdf/relations-sustainability/Alcoa_RS2017.pdf
8.3 Alien Species	Conformance	It was evidenced that, prior to the implementation of the Mine, the Entity carried out a study to diagnose and assess the fauna and flora species within the area of direct and indirect influence. Since then, the Entity has developed Environmental Control Plans to

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		monitor possible changes in fauna and flora populations, including alien species. Every six months there are campaigns to monitor fauna and flora and reports are prepared and presented to the environmental agency.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Conformance	The Entity is not located in an area considered a World Heritage property. It is possible to access the last published report on: https://www.alcoa.com/sustainability/en/pdf/2017-Sustainability-Report.pdf
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	The Entity is not located in an area considered a World Heritage property. It is possible to access the last published report on: https://www.alcoa.com/sustainability/en/pdf/2017-Sustainability-Report.pdf
8.5a Mine rehabilitation (best available techniques)	Conformance	The Entity has prepared its Degraded Areas Recovery Plan (PRAD) and the Mine Closure Plan, which describe the procedures for closing the mine, rehabilitation, monitoring and associated processes using best available technologies.
8.5b Mine rehabilitation (financial provisions)	Conformance	The Entity has a document with cost estimates for the closure of its first mine area to be rehabilitated (Capiranga Plateau) and monthly resources are provided to support the closing activities, as well as the monitoring of this area.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	It was evidenced that the Entity has a Human Rights Policy with commitments related to Health and Safety, Forced Labour, Human Trafficking, Working Time, Trusting Workplace and Equal Opportunity, Children and Young Workers, Freedom of Association and Collective Bargaining, a work environment free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats, Suppliers, Contractors, Joint Ventures and Relationships with Communities.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has a defined Due Diligence process for Human Rights, including the identification, prevention and mitigation of potential and actual human rights risks.

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9.1c Human Rights Due Diligence (remediation)	Conformance	It was evidenced that the Entity has defined a Due Diligence process of human rights, demonstrating the identification, prevention and mitigation of potential and actual human rights risks and has defined the procedure of communication and consultation about the remediation actions and controls to personnel and other affected stakeholders in the area influence of the Entity.
9.2 Women's Rights	Conformance	The Entity has a strategy and affirmative action on gender equity, strengthened on the locations in Brazil through the actions of the ANN (Alcoa Women's Network).
9.3 Indigenous Peoples	Not Applicable	It was evidenced that, according to an interview with the Human Rights Manager and through internet searches, newspapers and a human rights declaration, there are no indigenous peoples in the region and no direct impacts from the Entity on the surrounding community.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	It was evidenced that, according to an interview with the Human Rights Manager and through internet searches, newspapers and a human rights declaration, there are no indigenous peoples in the region and no direct impacts between the company and the surrounding community.
9.5 Cultural and sacred heritage	Conformance	The Entity has procedures outlining the identification of sacred and/or cultural heritage sites and values within the Entity's Area of Influence, and, according to its operating licence, it was also evidenced that the Entity implements the technical requirement for communication and mandatory preservation when identifying archaeological sites in its area of influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	It was evidenced that, in the last 10 years, the Entity did not relocate communities and does not plan any relocation in the future. If re-allocations are necessary, measures are defined in the operating licence.
9.6b Resettlements (where unavoidable)	Not Applicable	It was evidenced that, in the last 10 years, the Entity did not relocate communities and does not plan any relocation in the future. If re-allocations are necessary, measures are defined in the operating licence.

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9.7a Local Communities (rights and interests)	Conformance	It was evidenced that the Entity has defined documented policies and procedures for identifying and assessing the legal and customary rights of local communities. The human rights due diligence process identified impacts to land and livelihoods of stakeholders, including natural resources resulting from operations.
9.7b Local Communities (impacts)	Conformance	It was evidenced that the Entity conducted a risk assessment to update the impacts of resettlement and / or displacement on stakeholders. Action plans and controls were developed and implemented to prevent and mitigate adverse impacts on the livelihoods of local communities.
9.7c Local Communities (livelihoods)	Conformance	It was evidenced that the Entity conducted engagement with local communities, particularly regarding the development of actions and plans to prevent and / or mitigate adverse impacts to their livelihood.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity follows the Human Rights Policy to not contribute to armed conflicts, and business activities are located in an area that may be characterized as "Social Welfare" (as defined by "International Alert, Human rights due diligence in conflict affected settings, 2018").
9.9 Security practice	Conformance	The Entity has a private security process that respects the national laws of Federal Policy and Human Rights in line with recognized standards.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	It was evidenced that the Entity, as defined in the Freedom of Association Policy, ensures all employees have the right to union membership and to initiate an Internal Union process.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	It was evidenced that the Entity respects the rights of workers, maintains records of negotiations between the Entity and the union or workers' association, including collective bargaining agreements, in compliance with national laws.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	It was evidenced that the Entity, as defined in the Freedom Policy, ensures that all employees have the right to union membership and to initiate an Internal Union process, and that the

CRITERION	RATING	COMMENT
		employees' rights are respected. However, the criterion is not applicable because freedom of association and collective bargaining are not restricted by applicable law in Brazil.
10.2a Child Labour (minimum age)	Conformance	It was evidenced that the Entity respects the law and hires only employees of legal minimum age.
10.2b Child Labour (hazardous)	Conformance	It was evidenced that the Entity does not use or support the use of child labour.
10.2c Child Labour (worst forms)	Conformance	It was evidenced that the Entity does not use or support the use of child labour.
10.3a Forced Labour (human trafficking)	Conformance	It was evidenced that the Entity does not use or support the use of child labour, slave labour and human trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	It was evidenced that the Entity does not require any form of deposit, recruitment fee or equipment advance from workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to lodge deposits or security payments at any time. The Entity follows the requirements on hiring workers as defined in the Code of Conduct and Human Rights Policy.
10.3d Forced Labour (debt bondage)	Conformance	It was evidenced that the Entity complies with the Human Rights Policy and its Code of Conduct, does not support forced labour and the Workers' Debt Bondage or force them to work in order to pay off debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity complies with its Human Rights Policy and its Code of Conduct, does not support forced labour and does not unreasonably restrict the freedom of movement of workers in the workplace or in on-site housing which was verified in worker interviews.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	It was evidenced that the Entity does not keep the original documents of workers.
10.3g Forced Labour (freedom to terminate employment)	Conformance	It was evidenced that the Entity assures the freedom of workers to terminate employment without penalty.
10.4 Non-Discrimination	Conformance	It was evidenced that the Entity ensures gender equality and does not allow discrimination.

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		https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp
10.5 Communication and engagement	Conformance	It was evidenced that the Entity ensures open communication with workers and representatives regarding the working conditions.
10.6 Disciplinary practices	Conformance	It was evidenced that the Entity ensures open communication with workers and on the working conditions and that there is no threat of retaliation, intimidation, harassment and no deduction of wages used as disciplinary practices.
10.7a Remuneration (living wage)	Conformance	It was evidenced that the Entity has a remuneration policy, ensuring the payment of a decent monthly salary for workers.
10.7b Remuneration (method of payment)	Conformance	It was evidenced that the Entity ensures the payment of monthly wages as defined by local legislation.
10.8 Working Time	Conformance	It was evidenced that the Entity ensures adequate working time for all employees, including overtime, public holidays and paid annual leave in accordance with local legislation.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	It was evidenced that the Entity has defined and communicated the Health & Safety Policy adequately.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	It was evidenced that the Entity has defined and communicated the Health & Safety Policy adequately, and that it is approved by the General Manager. It was also evidenced that the policy is made available to visitors and internal contractors during briefing at the site.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	It was evidenced that the Entity has defined and communicated the Health & Safety Policy adequately, and that this is approved by the General Manager. The process includes circulating the policy in the site and to external stakeholders.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's EHS Policy (Environment, Health and Safety) demonstrates that workers have the right to understand the hazards and safe

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		practices for their work, and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Minor Non-Conformance	The Entity has systems in place for Occupational Health and Safety. However minor non-conformances were found related to the renewal of the Fire Department licence and the luminance levels.
11.3 Employee engagement on health and safety	Conformance	It was evidenced that the Entity has several initiatives of engagement for occupational health and safety programs.
11.4 OH&S performance	Conformance	It was evidenced that the Entity has tools for evaluation and continuous improvement of occupational health and safety performance.