
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOA SAN CIPRIÁN

CERTIFICATE
NUMBER

93

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

25 AUGUST 2020

DATE OF EXPIRY

24 AUGUST 2023

CERTIFIED SINCE

25 AUGUST 2020

AUTHORISED BY

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

Alcoa San Ciprián Refinery, Residue Storage Area
and Port operations.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa
ENTITY NAME	Alcoa San Ciprián
CERTIFICATION SCOPE	Alcoa San Ciprián Refinery, Residue Storage Area and Port operations.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Alumina Refining
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">First Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none">16 - 18 June 2020 (initial desktop audit)14 July 2020 (follow up on-site audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">12 August 2020
AUDIT SCOPE	<p>Alcoa San Ciprián Refinery, Residue Storage Area and Port operations.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Alumina Refining <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p>At the commencement of the audit, access to the site was not possible, due to COVID-19 related travel restrictions. The audit was initially undertaken as a desktop exercise in mid-June 2020, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation. The audit was later completed on-site on 14 July 2020.</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

25 August 2020 - 24 August 2023

NEXT AUDIT
TYPE

Re-certification Audit

NEXT AUDIT
DUE DATE

24 August 2023

CERTIFICATE
NUMBER

93

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a system to ensure legal compliance, with the appointment of a competent legal team across organisational functions. The Entity has defined policies and procedures to ensure the identification of risks and compliance with the applicable legislation.
1.2 Anti-Corruption	Conformance	The Entity has defined policies and procedures to identify and manage risks against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. The defined processes affect all employees in the Entity and subcontractors. It was evidenced that the Entity has not received any notification or penalty related to violations of laws in the last 5 years specifically related to anti-bribery and corruption or anti-competitive behaviour. The Entity has published its anti-corruption policy on the web: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption.asp .
1.3 Code of Conduct	Conformance	The Entity has defined a Code of Conduct. The Code of Conduct is communicated to all interested parties, covering all the key aspects of the business, business activities, conflicts of interest, relations with customers and suppliers, and compliance with Human Rights. The Code of Conduct is reviewed regularly. The Entity publishes externally its Code of Conduct on the web: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct.asp .
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has defined and maintains different policies aligned with the ASI standard principles. The development, approval and review of policies are part of the Entity's management processes, such as the ISO 14001, ISO 45001, ISO 50001 systems. The defined policies are consistent with the Entity's scope, activities and risks.

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management supports the Environmental, Social, and Governance policies through the provision of resources and periodic reviews of the policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has a process in place to communicate policies internally and externally. The policies are communicated to all Entity's employees and to stakeholders, suppliers and subcontractors through the appropriate channels.</p> <p>The Entity externally publishes the Environmental, Health and Safety (EHS) Policy on the web: https://www.alcoa.com/sustainability/en/environment-health-safety.asp and the Human Rights Policy on the web: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp.</p>
2.2 Leadership	Conformance	In accordance with the Aluminium Stewardship Initiative Performance Standard as well as their Environmental and Health & Safety Management System, the Entity has nominated Senior Management Representatives as having overall responsibility and authority for ensuring conformance with this Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an environmental management system and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has implemented an Occupational Health and Safety Management System certified according to ISO 45001:2018 standard. The scope and operations included in the ISO 45001 certificate are aligned with the risks and areas in which the Entity operates.</p> <p>The Entity has implemented a social responsibility management system aligned with the needs of the stakeholders.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has a policy for responsible sourcing as part of its purchasing process. The Entity integrates environmental, social and governance criteria in their supplier selection process.</p> <p>The Entity has a process to identify, evaluate the risks in responsible sourcing and establish actions and controls to monitor their effectiveness.</p> <p>The Entity's standards for suppliers with</p>

CRITERION	RATING	COMMENT
		<p>principles of responsible sourcing are available on the web: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier_Standards.pdf.</p>
2.5 Impact Assessments	Conformance	<p>The Entity conducted impact assessments in the area, including assessments of human rights, environmental and social impacts.</p> <p>The Entity has implemented a process for important changes or new projects that identifies and evaluates the risks and impacts in the Area of Influence, including consultation with stakeholders.</p> <p>There were no new projects or important changes in the installation since the Entity joined ASI.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has implemented exterior and interior emergency plans in accordance with current regulations and laws. The emergency plans have been communicated to the authorities, subcontractors and to all employees.</p> <p>The Entity has implemented several action protocols for different emergency scenarios, which are regularly trained.</p> <p>The Entity's external emergency plans are published on the web: https://cpapx.xunta.gal/c/document_library/get_file?file_path=/portal-cpapx/DXEmergenciasInterior/PlansEmergencia/PEE_SanCibrao_cas.pdf.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity has implemented a due diligence process that includes environmental, social and governance issues in Mergers and Acquisitions (M&A). There have been no Mergers and Acquisitions (M&A) in the area since the Entity joined ASI.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity has implemented a closure, dismantling and divestment process in which the responsibilities for legal compliance and the evaluation of stakeholder interests are defined.</p> <p>The Entity also has an asset management procedure/policy, which covers the entire facility life cycle, including planning for end-of-life. This procedure includes provisions for awareness and prevention of negative social, environmental, and governance impacts and promoting of positive outcomes.</p>

CRITERION	RATING	COMMENT
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity publishes periodically its financial performance in the annual report and the proxy statement, and makes the information publicly available on the company website: https://investors.alcoa.com/financial-reports/annual-reports-and-proxy-statements.</p> <p>The Entity prepares the annual sustainability report in line with GRI (Global Reporting Initiative) guidelines and makes the information publicly available on the company website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf. Throughout the sustainability report, the Entity provides a reference of the Entity's contribution to the UN Sustainable Development Goals.</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity has implemented a process to identify and report legal non-compliance and liabilities, internally and externally.</p> <p>The Entity did not receive significant fines, judgments, monetary sanctions or non-monetary sanctions for non-compliance with regulations or laws.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity demonstrated it has policies and processes to ensure compliance with the requirements of ASI and the legal requirements applicable to payments to governments.</p>
3.3b Payments to governments (disclosure . bauxite mining)	Not Applicable	<p>This criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has adequate mechanisms for receiving stakeholder complaints, grievances and requests. This mechanism is available to the public through various channels. The Entity has an integrity line: phone +34 900-95-1247 and on the web: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line.asp.</p> <p>There have been no relevant complaints or requests since the Entity joined ASI.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has implemented a process for performing the LCA (Life Cycle Assessment). The scope of the LCA study is cradle-to-gate and includes raw material sourcing and extraction, transportation of raw materials to</p>

CRITERION	RATING	COMMENT
		produce alumina for primary aluminium production. The LCA has been carried out in accordance with ISO 21930 and identifies environmental impacts and indicators.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity has developed an Environmental Product Declaration (EPD) in accordance with ISO 14025 and relies on Life Cycle Assessment (LCA) to provide information on a number of environmental impacts of products over their life cycle.</p> <p>The Entity has implemented a process by which customers can request Life Cycle Assessment (LCA) or Environmental Product Declarations (EPD) and the Entity provides these to them. EPDs are also available online through the website and also linked through the sustainability report.</p> <p>The Entity externally publishes EPD on its website: https://www.alcoa.com/global/en/what-we-do/aluminum/cast-products/pdfs/Alcoa-EPD-Cast-Products.pdf.</p> <p>Also, the Entity externally publishes the results of its LCA and EPD in its sustainability report, page 26: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity has implemented a process for performing the LCA (Life Cycle Assessment). The scope of the LCA study is cradle-to-gate and includes raw material sourcing and extraction, transportation of raw materials to produce alumina for primary aluminium production. The LCA has been carried out in accordance with ISO 21930 and identifies the scope of the study, results, sensitivity analysis and conclusions.</p> <p>The Entity externally publishes the results of its LCA in its sustainability report, page 26: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p>
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.

CRITERION	RATING	COMMENT
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	<p>The Entity prepares an annual sustainability report, which is prepared in accordance with Global Reporting Initiative (GRI) principles. The sustainability report includes the time-bound Greenhouse Gases (GHG) emissions reduction targets and a plan to achieve them. The targets cover the reduction of GHG footprint (direct and indirect emissions).</p> <p>The Entity publishes its targets and action plans externally in the sustainability report, page 61, which is made available to the public on the web: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p> <p>The Entity holds valid ISO 14001:2015 and ISO 50001:2011 certificates.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity prepares an annual sustainability report, which is prepared in accordance with GRI principles. The sustainability report includes the time-bound Greenhouse Gases (GHG) emissions reduction targets and a plan to achieve them. The targets cover the reduction of GHG footprint (direct and indirect emissions).</p> <p>The Entity publishes its targets and action plans externally in the sustainability report, page 61, which is made available to the public on the web: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p> <p>The Entity holds valid ISO 14001:2015 and ISO 50001:2011 certificates.</p>
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.

CRITERION	RATING	COMMENT
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	<p>The Entity has implemented a process to identify and monitor emissions to air. The Entity verifies emissions to air through an independent accredited body.</p> <p>The Entity has an environmental authorization for emissions to air and complies with the laws and regulations requested by environmental authorities. The Entity communicates to the authorities the results of emissions to air and any anomaly that is identified, including the actions for its control.</p> <p>The Entity publishes the emissions to air data, targets and plans in its sustainability report, page 85, which can be found on its website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p> <p>The Entity holds a valid ISO 14001:2015 certificate.</p>
6.2 Discharges to Water	Conformance	<p>The Entity has a process for the control of discharges to water and has defined the risk points and takes measures for their control and improvement. The Entity carries out controls by an accredited and independent external body regarding discharges to water.</p> <p>The Entity has an environmental authorization for discharges to water and complies with the rules and application regulations requested by environmental authorities.</p> <p>The sustainability report includes data of discharges to water. The Entity publishes the data, objectives and action plans on discharges to water in its sustainability report, page 81, which can be found on its website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p> <p>The Entity holds a valid ISO 14001:2015 certificate.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has implemented a procedure for the prevention and control of spills and leakage. The Entity has identified the risk points of spills or leakage. The Entity carries out inspections according to the regulations by an accredited external company independent of the risk points of spills or leakage.</p>

CRITERION	RATING	COMMENT
		<p>The Entity has an environmental authorization that defines the legal requirements regarding spills and leakages such as: frequency of controls, parameters to analyse, limits of control and communication of incidents. The Entity externally publishes its environmental authorization on the website of the Galician authority (Xunta de Galicia): https://www.xunta.gal/dog/Publicados/2019/20190723/AnuncioG0532-250619-0004_es.html.</p> <p>The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certificates.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has implemented a procedure for the prevention and control of spills and leakage to prevent and detect the spills and leakage. The Entity has identified the risk points of spills or leakage. The Entity carries out inspections according to the regulations by an accredited external company independent of the risk points of spills or leakage.</p> <p>The Entity has an environmental authorization that defines the legal requirements regarding spills and leakages such as: frequency of controls, parameters to analyse, limits of control and communication of incidents. The Entity externally publishes its environmental authorization on the website of the Galician authority (Xunta de Galicia): https://www.xunta.gal/dog/Publicados/2019/20190723/AnuncioG0532-250619-0004_es.html.</p> <p>The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certificates.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has implemented procedures for the prevention and control of spills and leakage to prevent and detect the spills and leakage. The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certificates.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has implemented procedures for internal and external communications on environmental matters that includes the volume, type and potential impact of significant incidents and remediation actions taken. The Entity has an environmental authorization that defines the legal requirements regarding communication of incidents.</p> <p>The sustainability report includes spills and leakage data.</p> <p>The Entity publishes the spills data, objectives</p>

CRITERION	RATING	COMMENT
		<p>and action plans in its sustainability report, page 79, which can be found on its website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p> <p>The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certificates.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. The strategy covers all waste generated within the relevant scope of operations.</p> <p>The Entity has implemented procedures to describe the requirements to manage waste to comply with applicable regulations, support the Environment, Health and Safety Management System, and further long term goals for a clean and healthy environment.</p> <p>The Entity holds a valid ISO 14001:2015 certificate.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity, in accordance with the regulations, has defined a plan to minimize the generation of hazardous and non-hazardous waste, this plan is presented to the Authorities. The Entity, to comply with the regulations, prepares an annual waste management report that is communicated to the Authorities. Most of the waste generated by the Entity is beneficially reused in an environmentally responsible way.</p> <p>The Entity communicates the results, objectives and plans in waste management in its sustainability report, page 77, which is published on its website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p> <p>The Entity holds a valid ISO 14001:2015 certificate.</p>
6.6a Bauxite Residue (storage construction)	Conformance	<p>The Entity has built a red mud deposit for the storage of bauxite residue. The red mud deposit is increased in such a way as to avoid leachate to the environment.</p> <p>The Entity publishes externally the technology for the construction of the red mud deposits on its website: https://www.alcoa.com/sustainability/en/pdf/impoundments-introduction.pdf.</p> <p>The Entity publishes externally its long-term strategy for the management of bauxite residue and Tailings Management in its sustainability</p>

CRITERION	RATING	COMMENT
		<p>report, page 73: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf. The Entity holds a valid ISO 14001:2015 certificate.</p>
6.6b Bauxite Residue (integrity checks and controls)	Conformance	<p>The Entity has implemented a control and monitoring process for the red mud deposit to ensure the integrity of the bauxite residue storage. Checks are carried out regularly. The checks are carried out internally and externally by a third party entity with recognized prestige. Checks include continuous monitoring and planned checks, which are appropriate for the size and type of the red mud deposit. The Entity performs and complies with the controls required by the applicable environmental regulations. The Entity defines more demanding measures and controls than those required by the applicable environmental regulations. The Entity holds a valid ISO 14001:2015 certificate.</p>
6.6c Bauxite Residue (water discharge)	Conformance	<p>The Entity has implemented a process to control water discharge from the bauxite waste area. The Entity complies with the water discharge quality regulations that are defined by the Environmental Authorization. The Entity controls and neutralizes water discharge from bauxite residue storage, to minimize impacts to the environment through an effluent treatment plant. The Entity holds a valid ISO 14001:2015 certificate.</p>
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	<p>The Entity, in compliance with the regulations, does not discharge bauxite residue to marine and aquatic environments. This practice is not allowed in Spain. The Entity has controls and records in place, demonstrating conformance. The Entity holds a valid ISO 14001:2015 certificate.</p>
6.6e Bauxite Residue (start of the art technologies)	Conformance	<p>The Entity has investigated and evaluated options for the reuse of bauxite waste. The Entity has prepared and updated a master plan that includes the activities, risks and opportunities for the deposit of red mud in the medium-long term. The sources of state-of-the-art information come from other locations in the</p>

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		Entity where the valued opportunities have been implemented.
6.6f Bauxite Residue (remediation)	Conformance	The Entity's red mud storage is still in operation. There is a closure project in which actions are contemplated to bring the current site to a state very similar to the initial one. The Entity externally publishes its long-term strategy for management in closure and rehabilitation tailings storage areas in its sustainability report, page 74: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf .
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	The Entity has Identified and mapped its water withdrawal and use by source and type. The Entity has a water balance showing water input and output flows, sources and destination. The Entity continuously monitors water consumption and water discharges. The Entity holds a valid ISO 14001:2015 certificate.
7.1b Water assessment (risk assessment)	Conformance	The Entity has implemented an ISO 14001:2015 environmental management system, periodically checked by a third party. As part of

CRITERION	RATING	COMMENT
		<p>this system, a risk assessment on soil and groundwater was carried out, assessing water-related risks in Watersheds in the Entity's Area of Influence.</p> <p>The result of the risk assessment showed that the site was located in an area that does not present water stress.</p> <p>The Entity also has an environmental authorization for the collection of reservoir water and discharge into the sea. The Entity has a plant built to collect, channel and treat all process water from all operations on the site. The Entity holds a valid ISO 14001:2015 certificate.</p>
7.2a Water management (management plans)	Conformance	<p>The Entity has an ISO 14001:2015 environmental management system, including those related to water consumption, use and discharge with indicators, objectives and action plans.</p> <p>The Entity has a long-term strategic objective based on defining and implementing a program focused on improving the efficiency of water use in locations in areas with water scarcity by 2020 and defines specific water use reduction targets for 2025 and 2030. The Entity in Spain is located in an area that does not present water stress.</p> <p>The Entity externally publishes its long term management plans for water use in its sustainability report, page 81, which is on its website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p>
7.2b Water management (monitoring)	Conformance	<p>The Entity has an ISO 14001:2015 environmental management system. As part of this system, there is the identification of environmental aspects, including those related to the consumption, use and discharge of water. Control indicators and objectives have been defined with action plans for these aspects. At the same time, as part of the environmental management system, it has a process to carry out system reviews that consider the effectiveness of action plans and the achievement of environmental objectives, including those related to water consumption, use and discharge.</p> <p>The Entity externally publishes its water use strategy with objectives and effectiveness of</p>

CRITERION	RATING	COMMENT
		<p>action plans in its sustainability report, page 81, which is on its website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p> <p>The Entity holds a valid ISO 14001:2015 certificate.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity has implemented a communication process, to communicate the data of consumption, use and discharge of water to the authorities according to regulations. Also, it contemplates the communication of incidents to the authorities and stakeholders.</p> <p>The Entity externally publishes its water use strategy with objectives and action plans in its sustainability report, page 81, which is on its website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity has implemented a process to assess the risk and materiality of the impacts on biodiversity of land use and activities in its Area of Influence. The Entity has implemented a biodiversity analysis carried out by a competent external expert advisor. This biodiversity analysis considers the Area of Influence and its boundaries, including company facilities, associated facilities and cumulative impacts. The biodiversity analysis carried out has also defined the HCVA (High Conservation Value Areas) methodology developed by the HCV Resource Network for the identification of key areas of biodiversity. The analysis contemplates the identification of species of flora and fauna, with presence or potential of presence and their level of vulnerability or protection. It also evaluates risks associated with invasive alien species.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>The Entity has defined a Biodiversity Action Plan aligned with the risks and impacts identified in its biodiversity analysis. The action plan includes the main actions, defining for each action the KPIs (Key Performance Indicators), objectives and a deadline for executing the actions. The Entity has evaluated the effectiveness of the actions defined in the Biodiversity Action Plan.</p>

CRITERION	RATING	COMMENT
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity's action plan applies the mitigation hierarchy in decision-making to minimize its impacts, prioritizing the adoption of measures to avoid impacts from the beginning, such as a careful location, spatial or temporal, of the element or disturbance.
8.2c Biodiversity management (reporting)	Conformance	<p>The Entity communicates the Biodiversity Action Plan and their results to stakeholders including Town Halls, Neighbourhood Associations, non-profit associations, schools and regular suppliers and contractors.</p> <p>The Entity communicates through the Alcoa Foundation information on its website on environmental projects aligned with the Biodiversity Action Plan: https://www.alcoa.com/foundation/en/.</p> <p>The Entity reports its corporate Biodiversity Action Plans and results in its sustainability report, page 68, which is published externally on its website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p>
8.3 Alien Species	Conformance	<p>The Entity has implemented a process to assess the risk and materiality of the impacts on biodiversity of land use and activities in its Area of Influence including the priority habitats and species (threatened and invasive).</p> <p>The biodiversity analysis contemplates the identification of species of flora and fauna, with presence or potential of presence and their level of vulnerability or protection. A biodiversity analysis has been carried out following the regulations identifying risks and impacts, including those associated with invasive alien species.</p> <p>The Entity has defined a 2020-2021 Biodiversity Action Plan aligned with the risks and impacts identified in its biodiversity analysis, including those related to alien species.</p>
8.4a Commitment to No Go+in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to No Go+in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity has a Human Rights Policy. The Human Rights Policy covers child labour, freedom of engagement, equality of opportunities, compensation, freedom of association, relationship with communities. It is aligned with the United Nations Guiding Principles on Business and Human Rights. The Entity has a Human Rights Policy which is publicly available on its website: https://www.alcoa.com/global/en/who-we-are/values/.</p> <p>Also, the Entity has a Code of Conduct, which includes the commitment towards respect for the protection of human rights for all stakeholders. The Entity has a Code of Conduct, which is publicly available on its website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf.</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has a Human Rights Due Diligence process to identify, prevent, mitigate and account actual and potential impacts on human rights. The Entity carried out Human Rights Due Diligence for each of the ASI-certified locations following the model established by the Danish Institute for Human Rights.</p> <p>In Spain, the due diligence process has been carried out, following the corporate guide. The risks, impacts, action plans and deadlines have been identified with people in charge.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity completed human rights risk assessments following the methodology of the Danish Institute for Human Rights. The human rights risk assessment did not show any areas of high concern.</p> <p>The Entity has identified the risks and impacts and has established action plans to improve the results, including those responsible for the actions and the deadlines for their implementation. The action plans are monitored and updated.</p>

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9.2 Women's Rights	Conformance	<p>The Entity has implemented an Equal Employment Opportunity Policy, which is communicated to all employees, and is also available externally on its website: https://www.alcoa.com/global/en/careers/pdf/Alcoa-EEO.pdf.</p> <p>The Entity has a Code of Conduct, which includes the Equal Employment Opportunity Policy on page 13 and is publicly available on its website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf.</p> <p>The Entity strengthens and deploys its gender equity strategy through the actions of the Alcoa Women's Network. Alcoa has defined diversity objectives and indicators. The results and performance can be seen in the sustainability report, on page 44, and are published externally on its website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p>
9.3 Indigenous Peoples	Not Applicable	It was evidenced that indigenous peoples, or their lands, territories and resources were not present in the Entity's Area of Influence, therefore this criterion was found to be Not Applicable.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	It was evidenced that indigenous peoples, or their lands, territories and resources were not present in the Entity's Area of Influence, therefore this criterion was found to be Not Applicable.
9.5 Cultural and sacred heritage	Not Applicable	It was evidenced that indigenous peoples, or their lands, territories and resources were not present in the Entity's Area of Influence, therefore this criterion was found to be Not Applicable.
9.6a Resettlements (avoid or minimise)	Not Applicable	There have been no resettlements for the Entity's activities since it became a member of ASI, therefore this criterion is Not Applicable.
9.6b Resettlements (where unavoidable)	Not Applicable	There have been no resettlements for the Entity's activities since it became a member of ASI, therefore this criterion is Not Applicable.
9.7a Local Communities (rights and interests)	Conformance	The Entity has a Stakeholder Engagement Process to ensure positive stakeholder relationships and effective means for resolving

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		<p>community concerns. Respect for communities is established in Spanish law and is respected by the Entity. The Entity's commitment to meet the rights and interests of local communities was also evidenced by the implementation of the Human Rights Policy and the Code of Conduct.</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity has a Stakeholder Engagement Plan of commitment to the community through numerous volunteer actions.</p> <p>The Entity has established an employee volunteering program. The projects are focused on sustainability and education. The Entity has evidenced its continued commitment to the local community.</p> <p>The Entity's strategy, objectives, plans and results in stakeholder and community engagement are published in the sustainability report, page 34, and published on their website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity has a Stakeholder Engagement Process to ensure positive stakeholder relationships and effective means for resolving community concerns. The Entity has a Stakeholder Engagement Plan of commitment to the community through numerous volunteer actions.</p> <p>The Entity has evidenced its continued commitment to the local community and explores with local communities the opportunities to respect and support their livelihoods. Numerous actions and social and environmental projects were evidenced, several of them through the Entity's volunteer program for employees, and focused on sustainability and education.</p> <p>The Entity's strategy, objectives, plans and results in stakeholder and community engagement are published in the sustainability report, page 34, and published on their website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity is committed to providing transparency for the supply chain in accordance with applicable laws and regulations, including the United States Securities and Exchange Commission's conflict minerals rule</p>

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		<p>implementing the Dodd-Frank Act.</p> <p>The Entity has developed standards for suppliers who incorporate the principles of responsible sourcing.</p> <p>The Entity has implemented a third party supplier due diligence program to further manage risk in its supply chain related to the areas of anti-bribery and corruption, trade compliance, child and slave labour, criminal history, human trafficking and conflict minerals. It was evidenced, in alignment with the Human Rights Policy, Code of Conduct and Human Rights Program, that the Entity does not contribute to armed conflict or human rights abuses in conflict-affected and high-risk areas.</p>
9.9 Security practice	Conformance	<p>The Entity maintains a contract with a specialized security company, in compliance with the Entity’s standards. The Entity has adequate procedures for human rights compliance. The company in charge of security, respects human rights in line with recognised standards and good practices. The company in charge of security has the appropriate infrastructure, experience and accreditation established by the legislation for the fulfillment of the security activity.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The Entity has a Human Rights Policy aligned with the United Nations Guiding Principles on Business and Human Rights which covers freedom of engagement and freedom of association. The Entity has a Human Rights Policy, which specifically allows employees the right to freedom of association. Also, the Entity has a Code of Conduct, which specifically allows employees the right to freedom of association. The Entity complies with the applicable regulations for freedom of association.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The Entity is a participant in the United Nations Global Compact, a strategic policy initiative for businesses that are committed to aligning their operations and strategies with universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The Entity has a Human Rights Policy. The Human Rights Policy is aligned with the United Nations Guiding Principles on Business and</p>

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		<p>Human Rights. The Entity has a Human Rights Policy, which is committed to bargaining in good faith with workers' representatives, on page 3, which is also publicly available on its website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf.</p> <p>In Spain, the Entity has a Collective Bargaining Agreement, which is negotiated and agreed with the works council. The Collective Bargaining Agreement is communicated to the authorities and is published externally at: http://www.deputacionlugo.gal/sites/deputacionlugo.org/files/Documentos/0_17911_1.pdf.</p> <p>The majority of the employees at Alcoa are unionized employees.</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	<p>The Entity ensures Freedom of Association and Right to Collective Bargaining, also in Spain. Regulations do not allow non-freedom of association and not having the right to collective bargaining.</p>
10.2a Child Labour (minimum age)	Conformance	<p>The Entity has a Human Rights Policy, which is aligned with the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) conventions for minimum age and child labour. The Entity has a Code of Conduct, which includes specifically not to tolerate forced, compulsory, child labour, or discrimination of any kind in their global operations.</p> <p>In Spain, the regulations establish a minimum age to work of 16 years and the protection of minors. The Entity does not hire minors under 18 years of age.</p>
10.2b Child Labour (hazardous)	Conformance	<p>The Entity is a participant in the United Nations Global Compact, a strategic policy initiative for businesses that are committed to aligning their operations and strategies with universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The Entity has a Human Rights Policy, which is aligned with the United Nations Guiding Principles on Business and Human Rights. This is also aligned with the International Labour Organization (ILO) conventions for minimum age and child labour.</p> <p>The Entity has a Code of Conduct which includes specifically no tolerance for forced,</p>

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		<p>compulsory, child labour, or discrimination of any kind in their global operations. The Entity has developed standards for suppliers who incorporate the principles of responsible sourcing. The Entity has implemented a third party supplier due diligence program to further manage risk in its supply chain related to the areas of child and slave labour.</p> <p>It was evidenced, in alignment with the Human Rights Policy, Code of Conduct and Human Rights Program, that the Entity does not contribute to armed conflict or human rights abuses in conflict-affected and high-risk areas.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Entity is a participant in the United Nations Global Compact, a strategic policy initiative for businesses that are committed to aligning their operations and strategies with universally accepted principles in the areas of human rights, labour, environment and anti-corruption.</p> <p>The Entity has developed standards for suppliers who incorporate the principles of responsible sourcing. The Entity's Supplier Standards and Standard Terms and Conditions contain clauses with which suppliers need to comply.</p> <p>The Entity has implemented a third party supplier due diligence program to further manage risk in its supply chain related to the areas of child and slave labour.</p> <p>It was evidenced, in alignment with the Human Rights Policy, Code of Conduct and Human Rights Program, that the Entity does not contribute to armed conflict or human rights abuses in conflict-affected and high-risk areas.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity has a Human Rights Policy aligned with the United Nations Guiding Principles on Business and Human Rights. This is also aligned with the International Labour Organization (ILO) conventions. The Entity publishes its Human Rights Policy on the website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf.</p> <p>In Spain, the Entity complies with the regulations for hiring people, either directly or through any employment or contracting agency.</p> <p>The Entity's Supplier Standards and Standard Terms and Conditions contain clauses with which suppliers need to comply.</p>

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		<p>The Entity has implemented a third party supplier due diligence program to further manage risk in its supply chain related to human trafficking and conflict minerals.</p>
<p>10.3b Forced Labour (deposits, fees, advances)</p>	<p>Conformance</p>	<p>The Entity has a Human Rights Policy aligned with the United Nations Guiding Principles on Business and Human Rights. This is also aligned with the International Labour Organization (ILO) conventions.</p> <p>The Entity has a Code of Conduct, which includes specifically on page 35 no tolerance for forced labour. The Entity publishes its Code of Conduct on the website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf.</p> <p>In Spain, in accordance with regulations, the Entity does not require employees to make any form of deposit or similar for hiring or carrying out activities.</p> <p>The Entity's Supplier Standards and Standard Terms and Conditions contain clauses with which suppliers need to comply. The Entity has implemented a third party supplier due diligence program to further manage risk in its supply chain related to the areas of anti-bribery and corruption.</p>
<p>10.3c Forced Labour (migrant workers)</p>	<p>Conformance</p>	<p>The Entity has a Human Rights Policy, which is aligned with the United Nations Guiding Principles on Business and Human Rights. This is also aligned with the International Labour Organization (ILO) conventions. The Entity publishes its Human Rights Policy on the website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf.</p> <p>The Entity has a Code of Conduct, which includes specifically on page 35 no tolerance for forced labour. The Entity publishes its Code of Conduct on the website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf.</p> <p>The Entity's conditions for national employees and migrant employees are the same and are in accordance with the regulations, including the no need for lodge deposits or security payments.</p>

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10.3d Forced Labour (debt bondage)	Conformance	<p>The Entity has a Human Rights Policy, which is aligned with the United Nations Guiding Principles on Business and Human Rights. This is also aligned with the International Labour Organization (ILO) conventions.</p> <p>In the Entity, the repayment of employees' debts are handled in accordance with the applicable local laws. The Entity has ethical practices regarding hiring of people, and is not supportive of any kind of forced labour.</p> <p>In Spain, all employees of the Entity have union representation and are hired following local requirements. No employee is forced to pay any debt. Also, the Collective Bargaining Agreement establishes within the chapter on Social Aid, the cases and the mechanism for granting loans to employees.</p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>The Entity is a participant in the United Nations Global Compact, a strategic policy initiative for businesses that are committed to aligning their operations and strategies with universally accepted principles in the areas of human rights, labour, environment and anti-corruption.</p> <p>In Spain, there is no prohibition of any labour agreement, of hiring conditions, or of movement restrictions for employees under any circumstances.</p>
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>The Entity has a Human Rights Policy, which is aligned with the United Nations Guiding Principles on Business and Human Rights. This is also aligned with the International Labour Organization (ILO) conventions.</p> <p>Specifically, the Entity does not unlawfully retain any employee's documents. There is no policy or practice requiring that these documents be retained for any purpose.</p> <p>In Spain, all Entity employees have union representation and are hired according to local requirements. No documentation belonging to the employee is retained.</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>Employees, either at will, or covered by the terms of the contract, are free to terminate their contract at any time.</p> <p>The Entity has ethical practices regarding hiring of people, and is not supportive of any kind of forced labour.</p> <p>In Spain, all Entity employees have union representation and are hired according to local</p>

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		<p>requirements. For the termination of a contract, workers must follow the provisions of the employment contract and current laws.</p>
10.4 Non-Discrimination	Conformance	<p>The Entity is a participant in the United Nations Global Compact, a strategic policy initiative for businesses that are committed to aligning their operations and strategies with universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The Entity has a Human Rights Policy, which covers equality of opportunities. The Entity has an Equal Employment Opportunity Policy, which prohibits all types of discrimination. The Entity has engagement practices for, and supports, diversity groups such as AWN (Alcoa Woman Network) and EAGLE (Employees at Alcoa for Gay and Lesbian Equality). In Spain, the Entity's Collective Bargaining Agreement establishes the mechanisms to guarantee non-discrimination in relation to opportunities for promotion, development and salary.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented a process for dealing with complaints and requests in accordance with the regulations and the Collective Bargaining Agreement. The Entity has established a group of staff to guarantee open communications and direct commitment to workers regarding working conditions and the resolution of work and compensation problems, without a threat of retaliation, intimidation or harassment. The Entity promotes a good environment for dialogue coordinated by HR (Human Resources). In addition, there is a communication channel available for employees to ask anonymous questions directly to leadership (plant manager and regional president).</p>
10.6 Disciplinary practices	Conformance	<p>The Entity is a participant in the United Nations Global Compact, a strategic policy initiative for businesses that are committed to aligning their operations and strategies with universally accepted principles in the areas of human rights, labour, environment and anti-corruption. The Entity has a Human Rights Policy aligned with the United Nations Guiding Principles on</p>

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		<p>Business and Human Rights.</p> <p>Also, The Entity has a Code of Conduct, which includes the commitment towards respect for the protection of human rights for all stakeholders. The Entity has implemented a process to report and investigate allegations of harassment, outlined in the anti-harassment/bullying policy. In Spain, the Entity follows Corporate's policies regarding Labour Conduct. The Entity also applies as a reference, the Statute of labour conduct of the Metal Sector as well as compliance with the provisions of the Collective Bargaining Agreement regarding the procedure for investigating offenses and penalties.</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity has implemented a process for payrolls, agreed with the unions and in accordance with the regulations. In Spain, the Collective Bargaining Agreement establishes the remuneration of personnel, including social benefits, vacations, premiums for results, pension plans, etc. These conditions improve those established in the sectoral agreements (Metal Sector Agreement). The Management Personnel also have as reference the salary tables, which also includes social benefits, pension plan, etc. In both cases, paid work permits are also included. In Spain, wages exceed the minimum wage limit established by law.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity follows the applicable law in determining the timing of wage payment. The remuneration package is competitive with the market where it is operating, as well as meeting the requirements according to the Spanish legislation.</p> <p>In Spain, the Entity has implemented a payment of wages process, which is very reliable and effective. Workers receive documentation of their payroll receipt either through an email address with an encrypted attachment, or via a secure paper copy. According to law, the payroll receipt includes all the items in detail.</p>
10.8 Working Time	Conformance	<p>The Entity follows the applicable local laws in determining working time and holidays.</p> <p>In Spain, the Entity establishes in the Collective Bargaining Agreement, the number of hours per year to be carried out according to regulations. Monitoring of compliance with the legal limit of</p>

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		overtime for each worker is also carried out. The workers' representatives are informed of the overtime hours performed.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has implemented a policy of Occupational Health and Safety and serious accidents. This policy identifies and evaluates risks, their control, the investigation of accidents and incidents and the development of the effectiveness of the Occupational Health and Safety Management System.</p> <p>The Occupational Health and Safety Policy is appropriate for the magnitude and nature of the risks of the Occupational Health and Safety Management System, and includes a commitment to continuous improvement and the prevention of injuries and damages, as well as a commitment to compliance of the legal requirements.</p> <p>The Occupational Health and Safety and serious accidents Policy is documented and is known to all the people who work in the organization, both its own and those in collaborating companies, as well as those visiting.</p> <p>The Occupational Health and Safety and serious accidents Policy is periodically reviewed to ensure that it remains relevant and appropriate to the needs of the Entity.</p> <p>The Occupational Health and Safety and serious accidents Policy is approved by the plant manager. The plant manager with the team lead provides the necessary resources for the deployment and compliance of Occupational Health and Safety and serious accidents Policy. The Entity holds a valid ISO 45001:2018 certificate.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity has implemented a policy of Occupational Health and Safety and serious accidents. The Occupational Health and Safety and serious accidents Policy is documented and is known to all the people who work in the organization, both its own and those in collaborating companies, as well as those visiting.</p> <p>The Entity has implemented several tools to assess the risks of its own workers and those of contractor companies, in addition to coordinating business activities.</p>

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		The Entity holds a valid ISO 45001:2018 certificate.
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and standards)	Conformance	<p>The Entity has a Human Rights Policy aligned with the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) conventions.</p> <p>The Entity has implemented a policy of Occupational Health and Safety and serious accidents, which includes the commitment to compliance of the legal requirements.</p> <p>The Entity holds a valid ISO 45001:2018 certificate.</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The Entity has implemented a policy of Occupational Health and Safety and serious accidents. The Occupational Health and Safety and serious accidents Policy is documented and is known to all the people who work in the organization, both its own and those in collaborating companies, as well as those visiting. This policy includes the right of workers to understand the risks and safe practices for their work, and the authority to reject or stop unsafe work.</p> <p>The Entity has implemented several tools to assess the risks of its own workers and those of contractor companies, in addition to coordinating business activities.</p>
11.2 OH&S Management System	Conformance	<p>The Entity has implemented an Occupational Health and Safety Management System in accordance with ISO 45001:2018 standard.</p> <p>The Entity holds a valid ISO 45001:2018 certificate.</p> <p>The Entity has an Occupational Risk Prevention Service and has higher-level Occupational Risk Prevention Technicians, having assumed the three technical specialties: Work Safety; Industrial Hygiene and Ergonomics and Applied Psychosociology.</p> <p>In addition, the Entity has an emergency plan and annual drills are held.</p>
11.3 Employee engagement on health and safety	Conformance	The Entity has established several committees and subcommittees so that workers can raise, discuss and participate in the resolution of occupational health and safety issues with those responsible for the area, the team lead or the plant manager. These committees and

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		<p>subcommittees are equal between the workers and the managers. All meetings and decisions are recorded in minutes and action plans are determined if necessary. Workers can freely report risks through a platform. They are tracked on the Occupational Health and Safety dashboard.</p> <p>The Entity holds a valid ISO 45001:2018 certificate.</p>
11.4 OH&S performance	Conformance	<p>The Entity monitors Health & Safety indicators. These indicators are distributed to all Heads of Department for their deployment. Annual objectives are defined, which are found in the planning of the preventive activity, which is available to the Workers' Representatives. The Entity also monitors health & safety indicators for contractors.</p> <p>The Entity has a process for risk notifications and observations and the accident objectives. This process is agreed with the Workers' Representatives.</p> <p>The Entity has a process to identify and communicate all incidents according to the law. The Entity communicates its health & safety strategy, objectives, action plans and results in the sustainability report, on page 50, which is published externally on its website: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.</p> <p>The Entity holds a valid ISO 45001:2018 certificate.</p>

Document Control and Version History

Revision	Date	Notes
0	25 August 2020	Issued (Initial certification audit)