

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

ALCOA CORPORATION

CERTIFICATE
NUMBER

72

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL CERTIFICATION DNV GL

ASI ACCREDITED
AUDITOR

DATE OF ISSUE

31 JANUARY 2020

DATE OF EXPIRY

30 JANUARY 2023

CERTIFIED SINCE

31 JANUARY 2020

AUTHORISED BY

A handwritten signature in white ink on a dark background, appearing to be 'J. H.' followed by a long horizontal stroke.

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

CERTIFICATION SCOPE

The ASI CoC Scope for Alcoa Corporation is compounded by 12 facilities globally, included in 8 different ASI Performance Standard certification processes:

- 1 - Juruti Mine and related port, beneficiation and administrative facilities (Juruti, PA - Brazil);
- 2 - Alumar's Refining facilities, including refining processes, port and administrative facilities (São Luís do Maranhão, MA - Brazil);
- 3 - San Ciprián Smelting, including baking furnace, casthouse and administrative facilities (San Ciprián, Lugo - Spain);
- 4 - Aluminerie Alcoa de Baie-Comeau aluminium smelting, casthouse and administrative facilities (Baie-Comeau, QC - Canada);
- 5 - Alcoa Mosjøen including manufacture of pre-bake anode, primary aluminium production, aluminium cast products (from liquid, cold metal and recycling pre-consumer scrap) and associated facilities. (Mosjøen - Norway);
- 6 - Western Australia Mining and Refining facilities (Huntly Mine, Willowdale Mine, Kwinana Refinery, Pinjarra Refinery and Wagerup Refinery) and related port, beneficiation / refining processes and administrative facilities;
- 7 - Alcoa Fjarðaál, including the production of aluminium and the cast of aluminium sows, ingots and T-bars and the production of aluminium rod, (considering support processes activities from engineering, planning, central maintenance and anode rodding. (Fjarðaál - Iceland); and,
- 8 - Alcoa Lista, including the development and production of aluminium extrusion ingots, foundry metal and manufacture of anode briquettes. (Lista - Norway)

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa Corporation
CERTIFICATION SCOPE	<p>The ASI CoC Scope for Alcoa Corporation is compounded by 12 facilities globally, included in 8 different ASI Performance Standard certification processes:</p> <ol style="list-style-type: none">1 - Juruti Mine and related port, beneficiation and administrative facilities (Juruti, PA - Brazil);2 - Alumar's Refining facilities, including refining processes, port and administrative facilities (São Luís do Maranhão, MA - Brazil);3 - San Ciprián Smelting, including baking furnace, casthouse and administrative facilities (San Ciprián, Lugo - Spain);4 - Aluminerie Alcoa de Baie-Comeau aluminium smelting, casthouse and administrative facilities (Baie-Comeau, QC - Canada);5 - Alcoa Mosjøen including manufacture of pre-bake anode, primary aluminium production, aluminium cast products (from liquid, cold metal and recycling pre-consumer scrap) and associated facilities. (Mosjøen - Norway);6 - Western Australia Mining and Refining facilities (Huntly Mine, Willowdale Mine, Kwinana Refinery, Pinjarra Refinery and Wagerup Refinery) and related port, beneficiation / refining processes and administrative facilities;7 - Alcoa Fjarðaál, including the production of aluminium and the cast of aluminium sows, ingots and T-bars and the production of aluminium rod, (considering support processes activities from engineering, planning, central maintenance and anode rodding. (Fjarðaál - Iceland); and,8 - Alcoa Lista, including the development and production of aluminium extrusion ingots, foundry metal and manufacture of anode briquettes. (Lista - Norway).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining• Aluminium Smelting• Aluminium Re-melting/Refining• Casthouses
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1

AUDIT TYPE	<ul style="list-style-type: none"> Initial Certification Audit (5 November – 13 December 2019) Scope Change Audit (3 September – 23 September 2020)
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none"> 5 November – 13 December 2019 (Initial Certification Audit) 3 September – 23 September 2020 (Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"> 11 January 2020 (Initial Certification Audit) 31 October 2020 (Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (5 November – 13 December 2019)</u></p> <p>The Audit Scope covered the following facilities:</p> <ul style="list-style-type: none"> Bauxite Mines in Brazil (Juruti) and Western Australia (Huntly and Willowdale); Refineries Operations in Brazil (ALUMAR) and Western Australia (Pinjarra, Kwinana and Wagerup); and, Smelters/Casthouses in Canada (Baie-Comeau) and Europe (San Ciprián in Spain and Mosjøen in Norway). <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"> Bauxite Mining Alumina Refining Aluminium Smelting Aluminium Re-melting/Refining Casthouses <p>All relevant criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p> <p><u>Scope Change Audit (3 September – 23 September 2020)</u></p> <p>The Audit Scope covered the following facilities:</p> <ul style="list-style-type: none"> Smelters/Casthouses in Norway (Lista) and Iceland (Fjarðaál). <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"> Aluminium smelting Aluminium Re-melting/Refining Casthouses <p>All relevant criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"> Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. <input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. <input checked="" type="checkbox"/> 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 31 January 2020 – 30 January 2023

NEXT AUDIT TYPE Surveillance

NEXT AUDIT DUE DATE 31 July 2021

CERTIFICATION NUMBER 72

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	<p>Alcoa has been an ASI Member since October 2015 under the Production and Transformation membership class (please refer to: https://aluminium-stewardship.org/about-asi/asi-members/alcoa-inc/).</p> <p>Alcoa Corporation has operational control over all of the Entities included in the scope of the ASI Chain of Custody Standard. For further details, please see Alcoa's website on: https://www.alcoa.com/global/en/who-we-are/locations/default.asp and in the 2019 Annual Report (page 3, available on: https://www.alcoa.com/global/en/pdf/annual-report-2019.pdf). More information on Alcoa Fjarðaál and Alcoa Lista can be found on page 9 -10 under Smelting, Casting and Rolling Operations.</p>
1.2 Management system	Conformance	<p>Alcoa has a Management System that addresses all applicable requirements of the Chain of Custody Standard. The manual describes the objectives, scope, governance model, responsibilities, internal controls and handling of ASI CoC and Non-CoC Materials, including calculation methods for the Material Accounting System. Alcoa has an integrated supply chain from mine to refinery, smelting and casthouse products. The handling of Non-CoC Materials, such as purchased Cold Metal and Scrap are described and subject to due diligence.</p>
1.3 Management system reviews	Conformance	<p>Alcoa conducts periodic reviews of its ASI CoC Management System, including quarterly reviews and checks of the quantities of CoC and Non-CoC Materials, as well as checking the accuracy of reported quantities to the ASI Secretariat. The Management System Manual is reviewed and updated at least once in an ASI Certification cycle (each 3 years).</p>
1.4 Management representative	Conformance	<p>Alcoa nominated a Senior Management Representative as having overall responsibility for the ASI Chain of Custody (CoC) Standard. Alcoa also established an ASI Global Implementation Team and supporting personnel in relevant business functions locally.</p>
1.5 Training	Conformance	<p>Alcoa developed and implemented communication and training measures that make relevant personnel</p>

CRITERION	RATING	COMMENT
		aware of and competent in their responsibilities under the ASI Chain of Custody (CoC) Standard. Adequate training was provided to the CoC operational team. The training matrix was well defined and training materials were developed. Training attendance control was well implemented.
1.6 Record keeping	Conformance	Alcoa maintains up-to-date records covering all applicable requirements of the Chain of Custody (CoC) Standard. There is no clean out of the operational system, therefore records can be kept for at least five years as defined by the ASI CoC Criterion.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	The Criterion is not applicable for the first initial Certification Audit.
1.7b Reporting to ASI (Input Percentage)	Not Applicable	The Criterion is not applicable for the first initial Certification Audit.
1.7c Reporting to ASI (Positive Balance)	Not Applicable	The Criterion is not applicable for the first initial Certification Audit.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	The Criterion is not applicable for the first initial Certification Audit.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The Criterion is not applicable for the first initial Certification Audit.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The Criterion is not applicable for the first initial Certification Audit.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The Criterion is not applicable for the first initial Certification Audit.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	No Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.2a Control of CoC Material	Not Applicable	No Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.2b No further outsourcing	Not Applicable	No Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.2c Risk assessment	Not Applicable	No Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.3 Output Quantity	Not Applicable	No Outsourcing Contractors are used in the Entity's CoC Certification Scope.

CRITERION	RATING	COMMENT
2.4 Verification and record-keeping	Not Applicable	No Outsourcing Contractors are used in the Entity's CoC Certification Scope.
2.5 Error management	Not Applicable	No Outsourcing Contractors are used in the Entity's CoC Certification Scope.

3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL

3.1a CoC Certification Scope – Bauxite Mining	Conformance	Alcoa Juruti (Brazil) Huntly and Willowdake Mines (Australia) are under the operational control of Alcoa. Please see: https://www.alcoa.com/global/en/who-we-are/locations/default.asp . ASI Bauxite is only sourced from these sites on Alcoa's Intercompany Mass Balance System. For further information on Alcoa's legal structure for Mining Activities, please see page 7 of its 2018 Annual Report: https://investors.alcoa.com/financial-reports/annual-reports-and-proxy-statements .
3.1b ASI Performance Standard – Bauxite Mining	Conformance	Alcoa's Juruti, Huntly and Willowdale Mines are all ASI Performance Standard Certified, with no Major Non-Conformances identified at these operations.
3.2a CoC Certification Scope – Alumina Refining	Conformance	Alcoa has operational control of all Refining Facilities included in the ASI Chain of Custody Standard Certification Scope. The Entity's Material Accounting System ensures that these are the only Facilities where ASI Alumina is produced. Please see page 11 of Alcoa's 2018 Annual Report: https://investors.alcoa.com/financial-reports/annual-reports-and-proxy-statements . For the locations of Alcoa's alumina refineries, please see the link below: https://www.alcoa.com/global/en/who-we-are/locations/default.asp .
3.2b ASI Performance Standard – Alumina Refining	Conformance	Alumar Refinery is ASI Performance Standard Certified. Alcoa's Western Australia refinery operations (at Kwinana, Pinjarra and Wagerup) are all ASI Performance Standard Certified, with no Major Non-Conformances identified at these operations.
3.3a CoC Certification Scope – Aluminium Smelting	Conformance	Alcoa ensures that ASI Liquid Metal is produced only from aluminium smelters that are within the Entity's CoC Certification Scope, which includes the following Facilities: - San Ciprian Smelter (Spain) - Baie Comeau Smelter (Canada) - Mosjoen Smelter (Norway) - Fjarðal (Iceland)

CRITERION	RATING	COMMENT
		<p>- Lista (Norway)</p> <p>The sites are under Alcoa's operational control: https://www.alcoa.com/global/en/who-we-are/locations/default.asp.</p> <p>Alcoa Fjardaal site has some small quantities of Liquid Metal purchased externally and this site is included within the CoC Certification Scope of another CoC Certified Entity.</p>
3.3b ASI Performance Standard – Aluminium Smelting	Conformance	<p>Alcoa San Ciprián, Baie-Comeau and Mosjøen Smelters are ASI Performance Standard Certified. Alcoa Fjardaal and Alcoa Lista Performance Standard Audits were carried out in parallel with the ASI Chain of Custody Scope Extension Audit by DNV GL.</p>
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Conformance	<p>Remelting and refining Facilities included in the Entity's ASI Chain of Custody Certification Scope are under Alcoa's operational control: https://www.alcoa.com/global/en/who-we-are/locations/default.asp. Only Alcoa San Ciprian, Alcoa Mosjoen and Alcoa Lista are enabled to receive and remelt external scrap; and they are included in the scope for Chain of Custody Certification.</p>
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	<p>Alcoa San Ciprian, Alcoa Mosjoen and Alcoa Lista Facilities are engaged in producing Recycled Aluminium within Alcoa's CoC scope. All of these Facilities are certified against the Performance Standard (Alcoa Lista's Performance Standard Audit was carried out at the same time as ASI Chain of Custody Standard by DNV GL, thus final Certificate number was pending at the time of writing of this Report).</p>
4.2a Pre-Consumer Scrap and Dross	Conformance	<p>Alcoa established procedures and processes to verify Pre-Consumer Scrap and Dross as designated CoC Material in its Management System Manual. The Mosjøen Facility sends its Dross to a third party and the recovered aluminium is an input into the production Process. These quantities were designated as CoC Materials on the Entity's Mass Balance System. The traceability of shipments were verified during the onsite audit in Mosjøen. Alcoa Lista sends its Dross to recover next door to the plant, and sows from Dross are stated on the Metal Flow sheet, designated as ASI CoC Inputs, subject to due diligence.</p>

CRITERION	RATING	COMMENT
4.2b Post-Consumer Scrap	Not Applicable	Post-Consumer Scrap is not accounted for as Eligible Scrap by Alcoa's Material Accounting System. Further details on Alcoa's Supplier Due Diligence is included under Criterion 7. Due Diligence.
4.3a Supplier records	Conformance	Alcoa has robust processes in place to gather and verify information about Recyclable Scrap Suppliers. The supplier registration process was reviewed for scrap suppliers, including the due diligence process and supporting evidence.
4.3b Cash payments	Not Applicable	Not applicable as no cash payments are allowed to suppliers as per Alcoa's Standard Operating Procedures.

5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM

5.1a CoC Certification Scope – Casthouses	Conformance	The Smelters San Ciprián, Baie-Comeau Mosjoen, Lista and Fjardaal are included in the scope for CoC Certification. They have a Primary Casthouse as part of the Smelting supply chain activities to produce alloys. The sites are under Alcoa's operational control: https://www.alcoa.com/global/en/who-we-are/locations .
5.1b ASI Performance Standard – Casthouses	Conformance	San Ciprián, Baie-Comeau and Mosjøen Smelters are ASI Performance Standard certified. Alcoa Fjardaal and Alcoa Lista performed ASI Performance Standard certification audits at the time of the ASI Chain of Custody Standard audit.
5.2 Casthouse Products	Conformance	Alcoa has established Processes to enable traceability of Casthouse Products physically printed on the Materials, supported by its ERP System (Oracle EBS) and this can be linked to the Input Quantity of CoC Material for that Material Accounting Period.

6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM

6.1a CoC Certification Scope – Post-Casthouse	Not Applicable	There are no Post-Casthouse activities within Alcoa's CoC Scope, only primary business.
6.1b ASI Performance Standard – Post-Casthouse	Not Applicable	There are no Post-Casthouse activities within Alcoa's CoC Scope, only primary business.
6.1c Sourcing ASI Aluminium	Not Applicable	There are no Post-Casthouse activities within Alcoa's CoC Scope, only primary business.

7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL

7.1a Responsible sourcing policy (anti-corruption)	Conformance	Alcoa established a Responsible Sourcing Policy, addressing anti-corruption and Bribery. Please see below for Alcoa's Supplier Standards:
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CRITERION	RATING	COMMENT
		<p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier_Standards.pdf.</p> <p>Please see below for Alcoa's Terms and Conditions which references Alcoa's Supplier Standards: https://www.alcoa.com/global/en/contact/supplier/default.asp.</p>
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	<p>Alcoa established Global Suppliers Standard which enhances Responsible Sourcing requirements (see sections "Act with Integrity" - page 2 and "Operate with Excellence" - page 3 of Alcoa's Supplier Standards referenced below).</p> <p>The Supplier Standards are available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier_Standards.pdf. Alcoa's Terms and Conditions is available at: https://www.alcoa.com/global/en/contact/supplier/default.asp.</p>
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	<p>Alcoa established Global Supplier Standard which addresses issues related to Human Rights Due Diligence (see sections "Act with Integrity" - page 2 and "Operate with Excellence" - page 3 on the Supplier Standards).</p> <p>Please follow the below link to access Alcoa's Supplier Standards: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier_Standards.pdf.</p> <p>Alcoa's expectations related to Human Rights are also communicated via its Terms and conditions to all relevant suppliers: https://www.alcoa.com/global/en/contact/supplier/default.asp.</p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>Alcoa established a robust process to ensure it is not creating business relationships with Suppliers who are on the United States Denied Party Listing, which forms part of its Due Diligence Process prior to contracting. Alcoa established processes to mitigate risks as a result of business activities with intermediaries.</p>
7.2 Risk assessment	Conformance	<p>Alcoa established different levels of due diligence, subject to levels of influence, type of material suppliers and other risk amplifiers. These risk assessment methods include automatic Due Diligence checks, EcoVadis assessments and offline supplier questionnaires. Alcoa regularly reports on the outcomes of these measures to senior management. A sample of Non-CoC Suppliers (including bauxite, Dross, and scrap materials) were reviewed and Due Diligence checks were verified during the audit.</p>

CRITERION	RATING	COMMENT
7.3 Complaints mechanism	Conformance	Alcoa operates an Integrity Line which is available at: www.AlcoaEthicsandCompliance.com . The complaints mechanism and internal Compliance Processes were reviewed during the audit. Alcoa's governance approach to managing complaints was robust.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	Alcoa's Intercompany Mass Balance System defined Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass. The Material flows were recorded. The Chain of Custody internal Control System described the Material flow, from the Bauxite mines into the Casthouses, passing along the Refineries and the Smelters. Non-CoC flows and flows to third party business partners were also identified. The additional Facilities, Alcoa Fjardaal and Alcoa Lista CoC and Non-CoC Input and Output Quantities were defined by mass, as well as the metal flow at these production facilities.
8.2a Post-Consumer Scrap	Not Applicable	In-Scope Casthouses that process scrap do not include Post-Consumer Scrap in their metal flows.
8.2b Pre-Consumer Scrap (total)	Conformance	Alcoa has a Material Accounting System developed to govern and report on Input Quantity of Pre-Consumer Scrap.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	Recovered Dross quantities in the Mosjoen and Lista sites are currently under Non-CoC Material flow to follow conservative accounting. Currently, there is no Pre-Consumer Scrap that Alcoa designates as Eligible Scrap.
8.3 Material Accounting Period	Conformance	1st Jan - 31st Dec, a 12 months calendar year will be Alcoa's defined Material Accounting Period.
8.4 Input Percentage	Conformance	Alcoa calculates and records the Input Percentage for a given Material Accounting Period. The Entity's Input Percentage calculations are aligned with ASI CoC requirements. The Entity uses consistent units (tonnes) and adequate Material Conversion rates in its calculations. Input Percentage was calculated in accordance with the ASI CoC requirements. The process was defined by Alcoa's ASI Chain of Custody Standard manual.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	Alcoa Facilities account for all Pre-consumer and Post-Consumer Scrap under the Non-CoC Material Flows.

CRITERION	RATING	COMMENT
8.6 Output Quantity determination	Conformance	Alcoa undertakes a global reconciliation exercise on a quarterly basis and defined the maximum CoC Output Quantities for each product, and production location according to the Input Percentages.
8.7 Output Quantity designation	Conformance	Alcoa established points of controls to ensure that the Output Quantity of CoC Material shall be designated as 100% CoC Material. This maximum volume will be determined by the Global Supply Chain mass balance, the conversion factor and the Percentage of CoC Material inputs vs the total production at location level. In Alcoa's IT System, designated CoC and Non-CoC flows are enabled, thus the Output Quantity of CoC Material will be designated as 100% CoC Material (as they relate to the lot numbers, material groups and unique identification numbers).
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	Alcoa's ASI Chain of Custody Standard manual defined how to account for the Eligible Scrap as per ASI requirements. The Material Accounting System defined the Output Quantities of Eligible Scrap.
8.9 Outputs not exceed inputs	Conformance	Alcoa established quarterly reviews and internal controls to ensure the Criterion is met. Alcoa's ASI Chain of Custody Global flow determines the maximum outputs of ASI CoC Material, based on CoC Material Inputs, conversion factors and Eligible Scrap. Relevant personnel has been trained to carry out the reconciliation tasks and Alcoa also ensures senior management oversight of the data, including internal verification of the data.
8.10a Internal Overdraws (not exceed 20%)	Conformance	Alcoa established internal controls and quarterly reviews of the Mass Balance data, ensuring that The Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material. Alcoa's Global ASI Supply Chain Calculation Sheet and Material Accounting System were reviewed during the Audit.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	Alcoa's quarterly reviews and internal control mechanisms will ensure that Internal Overdraw does not exceed the amount of CoC Material affected by a force majeure situation. There were no Internal Overdraws during the Material Accounting Period reviewed at the Scope Change Audit (Q1-Q3 2020).
8.10c Internal Overdraws (period to make up)	Conformance	The Entity's Material Accounting System, quarterly reviews and internal control mechanisms will ensure that Internal Overdraw will be made up within the subsequent Material Accounting Period. The ASI Global Implementation Team conduct quarterly reviews of the Mass Balance system,

CRITERION	RATING	COMMENT
		<p>reconciling the Input and Output Quantities of CoC and Non-CoC Materials. The reviews will have senior management oversight to internally validate the data.</p> <p>There were no Internal Overdraws during the Material Accounting Period reviewed at the Scope Change Audit (Q1-Q3 2020).</p>
8.11a Positive Balance (carry over)	Conformance	The Entity will conduct quarterly reviews of the Mass Balance System, reconciling the Input and Output Quantities of CoC and Non-CoC Materials. The reviews will have senior management oversight to internally validate the data. Any Positive Balance will be clearly indicated on the Intercompany Mass Balance System.
8.11b Positive Balance (expiry)	Conformance	The Entity will conduct quarterly reviews of the Mass Balance System, reconciling the Input and Output Quantities of CoC and Non-CoC Materials. The reviews will have senior management oversight to internally validate the data. Any Positive Balance will be clearly indicated on the Intercompany Mass Balance System and during the annual reviews, the Positive Balance expiry requirements will be implemented.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities as evidenced by a review of Alcoa's ASI Chain of Custody Standard manual, review of draft CoC Documents and interviews with personnel. Alcoa will include CoC information in the accompanying CoC Document to other CoC Certified Entities.
9.2a Date of issue	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. Alcoa has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including Date of Issue.
9.2b Reference number	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. Alcoa has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including the Reference number.

CRITERION	RATING	COMMENT
9.2c Issuing Entity	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. Alcoa has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including information on the Issuing Entity.
9.2d Receiving customer	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. Alcoa has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including information on the customer receiving the CoC Material.
9.2e Responsible employee	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. Alcoa has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including the Responsible employee who can verify the information and commercial contact details.
9.2f Conformance statement	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. Alcoa has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including the Conformance statement.
9.2g Type of CoC Material	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. Alcoa has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including Material Type.
9.2h Mass of CoC Material	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. Alcoa has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including the Mass of CoC Material in the shipment.
9.2i Mass of total material	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. Alcoa has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or

CRITERION	RATING	COMMENT
		Certified Inspection Report), including Mass of total material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	Alcoa does not intend to publish Sustainability Data on the CoC Documents with shipments.
9.3b Sustainability Data (passing on)	Not Applicable	There are no Post-Casthouse activities within Alcoa's CoC Scope, only primary business.
9.3c Post-Casthouse ASI Certification status	Not Applicable	There are no Post-Casthouse activities within Alcoa's CoC Scope, only primary business.
9.4 Supplementary Information (optional)	Not Applicable	Alcoa does not intend to disclose Supplementary Information on CoC Documents.
9.5 Response to verification requests	Conformance	Customer service and the commercial teams will be responsible for handling the CoC requests from customers, aligned to Alcoa's Quality System Management System. Relevant personnel was trained on their duties under ASI CoC Standard. We observed the system was robust to document verification requests, errors, corrective actions and any potential preventive measures to meet ASI Chain of Custody Criteria. No verification requests were received by Alcoa to date.
9.6 Error management	Conformance	Error management process is integrated within Alcoa's Quality Management System. Non-conformities, root causes and corrective actions were identified and regularly monitored by Alcoa's commercial management team.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	Alcoa has a Management System Procedure and established routines to regularly check and verify CoC Documents received from other Certified Entities.
10.2 Verify consistency with shipments	Conformance	We observed Alcoa's capacity to meet this Criterion in the future. Alcoa established controls to regularly check the consistency of the CoC Documents before recording information in the Oracle ERP Material Accounting System. The effectiveness of these measures will be checked at the next Surveillance Audit.
10.3 Verify supplier CoC Certification Status	Conformance	Alcoa established a Management System Procedure to regularly check the ASI website to verify validity and scope of supplier's ASI Certification. However, we noted that the Mass Balance System will mainly include Intercompany Certified Material, and some limited input will come from third party Certified Entities.

CRITERION	RATING	COMMENT
10.4 Error management	Conformance	<p>Alcoa has developed an error management procedure which is integrated into its current complaints mechanism and error Management System on Oracle.</p> <p>Customer Issues Tracking Centre for Aluminium processes was reviewed. The system enables the tracking of errors and subsequent Corrective Actions, which can be linked to the Material Accounting System.</p> <ul style="list-style-type: none"> - Rootcause identification - Corrective Action - Effectiveness Evaluation - Claim management

11 MARKET CREDITS SYSTEM: ASI CREDITS

11.1a Material Accounting System – allocation	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.1b Link to Casthouse Products	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.1c No double counting	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.1d No Positive Balance for ASI Credits	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.2a Date of issue	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.2b Reference number	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.2c Issuing Entity	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.2d Receiving Entity	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.2e Conformance statement	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.

CRITERION	RATING	COMMENT
11.2f ASI Credits statement	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.2g Quantity	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.3b Material Accounting System – purchasing	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.3c Expiry	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.3d No re-trading	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.3e No allocation to physical products	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.3f Verify supplier CoC Certification status	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Alcoa does not intend to use the ASI Market Credit System. The Entity implemented a Material Accounting System based on Mass Balance.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	Alcoa integrated ASI Claims Guide requirements into its internal procedures. An approval matrix has been defined to ensure all claims are aligned with the ASI Claims Guide and approved by senior management.
12.1b Verifiable evidence	Conformance	Alcoa demonstrated awareness of the ASI Claims Guide and robust processes and controls to ensure that all ASI-related claims can be supported by verifiable evidence (e.g. use of ASI logo, press releases, client presentations).
12.1c Employee training	Conformance	Relevant personnel have been identified and training completed regarding ASI claims and representation as per schedule.

Document Control and Version History

Revision	Date	Notes
0	31 January 2020	Issued (Full Certification)
1	8 December 2020	Scope Change Audit to incorporate Alcoa Fjarðaál and Alcoa Lista.