## ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

### ALCOA LISTA

CERTIFICATE NUMBER 103 ASI STANDARD PERFORMANCE STANDARD

STANDARD (V2 2017) CERTIFICATION
LEVEL
FULL
CERTIFICATION

ASI ACCREDITED AUDITOR DNV GL

DATE OF ISSUE

18 NOVEMBER 2020

DATE OF EXPIRY

17 NOVEMBER 2023

CERTIFIED SINCE

18 NOVEMBER 2020

AUTHORISED BY

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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

Development and production of aluminium extrusion ingots, foundry metal and manufacture of anode briquette; and associated facilities at Alcoa Lista (Norway).

# SUMMARY AUDIT REPORT PERFORMANCE STANDARD

#### **OVERVIEW**

Alcoa Corporation  ENTITY NAME  Alcoa Lista  CERTIFICATION SCOPE  Development and production of aluminium extrusion ingots, foundr and manufacture of anode briquette; and associated facilities.  SUPPLY CHAIN ACTIVITIES  Aluminium Smelting Aluminium Re-melting/Refining Casthouses  ASI STANDARD  Performance Standard V2  AUDIT TYPE  Certification Audit  DNV GL  AUDIT DATE  23 September – 24 September 2020  AUDIT REPORT SUBMISSION  Development and production of aluminium extrusion ingots, foundr and manufacture of anode briquettes at Alcoa Lista (Norway). Suppactivities included in the Audit Scope: Aluminium Smelting Aluminium Re-melting/Refining Casthouses	
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Aluminium Re-melting/Refining	
<ul> <li>Casthouses</li> </ul>	
All relevant supply chain activities, and Criteria in the Performance were included in the Audit Scope.	Standard
AUDIT • Certification OUTCOME	
AUDIT The Auditors confirm that:  METHODOLOGY	
■ The information provided by the Entity is true and accurate to the knowledge of the Auditor(s) preparing this Report.	ie best
☑ The findings are based on verified Objective Evidence relevant time period for the Audit, traceable and unambiguous.	to the

	The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
	The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	18 November 2020 – 17 November 2023
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	17 November 2023
CERTIFICATION NUMBER	103

#### **SUMMARY OF FINDINGS**

CRITERION	RATING	COMMENT	
PRINCIPLE 1 BUSINE	PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented systems to ensure legal compliance, with the appointment of a competent legal team across organizational functions. The Entity has defined policies and procedures to ensure the identification of risks and compliance with Applicable Law.	
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. A local Ethics Handbook has been developed and is available for all employees in the Entity and subcontractors. During the audit and our investigations no situations related to breaches on Applicable Laws were found: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption.asp.">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption.asp.</a>	
1.3 Code of Conduct	Conformance	A Code of Conduct has been defined and 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, translated to Norwegian and employees and subcontractors are trained: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_Norwegian.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_Norwegian.pdf</a> .	
PRINCIPLE 2 POLICY	& MANAGEMEN	Т	
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintained, at relevant levels in the Organisation, Environmental, Social and Governance Policies. The Entity holds valid ISO 9001, 14001 and 50001 Certificates. Corporate Policies are also available, e.g. Global EHS Policy: <a href="https://www.alcoa.com/sustainability/en/environment-health-safety.asp.">https://www.alcoa.com/sustainability/en/environment-health-safety.asp.</a> Alcoa Human Rights Policy: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp.">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp.</a>	
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The policies and procedures are reviewed and updated on a regular basis, and all corporate policies and procedure have senior management approval.  Local Quality, Environment, Health and Safety Policy is signed by the Entity Managing Director. The Entity holds valid ISO 9001, 14001 and 50001 Certificates.	
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates the policies internally and externally as appropriate and through multiple channels:	

CRITERION	RATING	COMMENT
		<ul> <li>Internally: Through internal Management System (INOSA), boards and screens</li> <li>Externally: <a href="https://www.alcoa.com/sustainability/en/pdf/EHS-Values-Policy-Principles.pdf">https://www.alcoa.com/sustainability/en/pdf/EHS-Values-Policy-Principles.pdf</a>.</li> </ul>
2.2 Leadership	Conformance	In accordance with the ASI Performance Standard as well as its Environmental and Management System, the Entity has nominated the Managing Director as having overall responsibility and authority for ensuring conformance with this Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented integrated Environmental and Social Management Systems and is ISO 14001:2015 Certified: <a href="https://www.alcoa.com/norway/no/default.asp.">https://www.alcoa.com/norway/no/default.asp.</a>
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented integrated Social Management Systems. Strong commitment, participation and cooperation between Workers' unions, management and employees are the founding elements in the Social Management System.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues. Policies are available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier Standards.pdf.</a>
2.5 Impact Assessments	Conformance	The Entity has procedures and systems in place to conduct environmental, social, cultural and Human Rights Impact Assessments for new projects or major changes to existing facilities. The Entity had one relevant major project ongoing at the time of the audit.
2.6 Emergency Response Plan	Conformance	The Entity has site specific Emergency Response Plans developed in collaboration with potentially affected Stakeholder groups such as Communities, Workers and their representatives, and relevant government bodies on environment, safety and fire department. A systematic approach with planning and training based on the identified risks and regulatory requirements could be demonstrated. An information brochure to external and neighbours is available on the web: <a href="https://www.alcoa.com/norway/no/pdf/storulykke-informasjon.pdf">https://www.alcoa.com/norway/no/pdf/storulykke-informasjon.pdf</a> .
2.7 Mergers and Acquisitions	Conformance	The Entity reviews environmental, social and governance issues in the Due Diligence process for Mergers and Acquisitions.  These elements are governed by Alcoa corporation.

CRITERION	RATING	COMMENT
CKITEKION -	NATING	- COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has processes and procedures to review environmental, social and governance issues in the planning process for Closure, Decommissioning and Divestment. A corporate procedure is established and national competent authorities and regulators have specific requirements in permits and operating licenses.
PRINCIPLE 3 TRANSF	PARENCY	
3.1 Sustainability Reporting	Conformance	The Entity prepares the Annual Sustainability Report in line with GRI (Global Reporting Initiative) guidelines and makes the information publicly available on the company's website and on printed Reports:  https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.  All Environmental reporting to the Norwegian Environment Agency is publicly available on: https://norskeutslipp.no/ and specific for the Lista site:  https://www.norskeutslipp.no/no/Diverse/Virksomhet/?Companyl D=5310.  Every second year the site in Norway prepares and documents an environment and sustainability Report:  https://www.alcoa.com/norway/no/pdf/arsrapport-2019-alcoanorway-ans.pdf.
3.2 Non-Compliance and liabilities	Conformance	The Entity has established procedures to publicly disclose information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law through its annual reporting. We have suggested a business improvement to Alcoa to be more specific and accurate in the country specific annual reports on local fines, judgments and penalties for failure to comply with national laws and permits.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity demonstrated policies and processes to ensure compliance with the requirements of ASI and the legal requirements applicable to payments to governments. Only legal and obligatory payments related to taxes and duties are paid. In the Alcoa Corporate Annual Report all payments to governments (taxes or tributes) are transparently reported: <a href="https://www.alcoa.com/global/en/pdf/annual-report-2019.pdf">https://www.alcoa.com/global/en/pdf/annual-report-2019.pdf</a> .
3.3b Payments to governments (disclosure – Bauxite Mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and culturally and gender sensitive, Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations.  This is accessible through a link on the web:

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		https://www.alcoa.com/global/en/who-we-are/ethics-compliance/.
PRINCIPLE 4 MATERI	AL STEWARDSH	IP
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has implemented and certified its Environmental Management System and evaluates environmental aspects in a life cycle perspective.  A Life Cycle Assessment Procedure has been developed and an Environmental Product Declaration, EPD, considering the products produced, is established. The EPD is in accordance with ISO 14025, third party verified and with the declaration number 4787971128.101.1.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Cradle to gate Life Cycle Assessment is developed through third party verified Environmental Product Declaration, EPD, as stated in 4.1a. The information is available and will be provided upon request or could be downloaded from the web: <a href="https://www.alcoa.com/global/en/what-we-do/aluminum/cast-products/pdfs/Alcoa-EPD-Cast-Products.pdf">https://www.alcoa.com/global/en/what-we-do/aluminum/cast-products/pdfs/Alcoa-EPD-Cast-Products.pdf</a> .
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Cradle to gate Life Cycle Assessment is developed through third party verified Environmental Product Declaration, EPD, as stated in 4.1a. The information is available and will be provided upon request or could be downloaded on the web: <a href="https://www.alcoa.com/global/en/what-we-do/aluminum/cast-products/pdfs/Alcoa-EPD-Cast-Products.pdf">https://www.alcoa.com/global/en/what-we-do/aluminum/cast-products/pdfs/Alcoa-EPD-Cast-Products.pdf</a> .
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established targets and action plans to minimize Process Scrap. All Process Scrap generated from the casthouse is recycled on site. Aluminium from old furnaces in the pot room (both bleed outs and pot pads) is remelted in the casthouse in campaigns.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has established systems and processes to separate Aluminium alloys and grades for recycling. All process scrap is recycled on site and the production system gives the needed structure and traceability for separating aluminium alloys and grades for recycling.
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	The Entity has implemented a recycling strategy, including specific timelines, activities and targets. Alcoa corporation is involved, engaged and supporting activities promoting collecting and recycling systems to increase recycling rates. The Lista site has an Agreement with its neighbour company to process and re-melt the scrap.
4.4b Collection and recycling of Products at	Conformance	As a member of The Recycling Partnership, the biggest Al recycling organization in North America, the Alcoa corporation is involved, engaged and supporting activities promoting collecting

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		COMMENT
end-of-life (engagement)		and recycling systems to increase recycling rates.  Locally the Lista site has an Agreement with their neighbor client to process and re-melt the scrap. The Entity does not buy scrap from local or other companies.
PRINCIPLE 5 GREENH	HOUSE GAS EMI	SSIONS
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity is part of the EU ETS (Emissions Trading Scheme). The direct emissions by source are calculated and reported annually to the Norwegian Environment Agency and publicly disclosed on the web site:  https://www.norskeutslipp.no/en/Miscellaneous/Company/?CompanyID=5310.  The aggregated GHG emissions and energy consumption are reported to corporate and disclosed in the Alcoa Sustainability Report on page 61 and 104:  https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.
5.2 GHG emissions reductions	Conformance	The Entity has a continuous focus to reduce and improve the GHG emissions and energy consumption. The plant is certified against ISO 50001 Energy Management Systems, driving continuous improvement on energy consumption and GHG emissions. Targets have been set both locally and on corporate level. In the Sustainability Report reduction targets are publicly disclosed: <a href="https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf</a> page 61. The local target is supported by action plans in different departments.
5.3a Aluminium Smelting (Management System)	Conformance	The Entity is certified against ISO 50001 Energy Management Systems. The Management Systems drive the governance, controls and improvement processes at the plant. The Entity has demonstrated over time a strong commitment to continuously work on energy and emission reduction. Very good results have been demonstrated over several years. The EU Emissions Trading Scheme requires implementation of a Management System with procedures and governance covering roles and responsibilities, quality control and methodology for calculation of the carbon footprint.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	Alcoa Lista's GHG emissions are annually verified by an accredited third party related to the EU Emissions trading scheme (by DNVGL). A carbon footprint has been calculated to 2,11 t CO2e/t Aluminium covering the direct and indirect emissions.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable since the Entity started production before 2020. There are no new smelters planned to be started after 2020 at the moment.

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6.1 Emissions to Air	Conformance	The Facility quantifies and reports its Emissions to Air that are part of its monitoring program established to mitigate and report on its environmental performance. The Facility has a permit from the Norwegian Environment Agency and reports annually to the Agency on emissions and performance. The Report is publicly available at the webpage: <a href="https://www.norskeutslipp.no/en/Miscellaneous/Company/?CompanyID=5310.">https://www.norskeutslipp.no/en/Miscellaneous/Company/?CompanyID=5310.</a>
6.2 Discharges to Water	Conformance	The Facility quantifies and reports its Discharges to Water that are part of its monitoring program established to mitigate and report on its environmental performance. The Facility has a permit from the Norwegian Environment Agency and reports annually to the Agency on discharges and performance. The Report is publicly available at the webpage: <a href="https://www.norskeutslipp.no/en/Miscellaneous/Company/?CompanyID=5310.">https://www.norskeutslipp.no/en/Miscellaneous/Company/?CompanyID=5310.</a>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Facility is ISO 14001 certified and regularly assesses major risks related to environmental aspects and potential spills and leakages from the production processes and Facility activities including transport. Government bodies, third parties and Alcoa corporate perform audits frequently.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Facility has a management and external communication plan, compliance controls and a monitoring programme in place to prevent, detect and mitigate accidental Spills and Leakages. The Entity holds a valid ISO 14001 Certificate.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has a management and external communication plan, compliance controls and a monitoring programme in place to prevent and detect Spills and Leakages. Spills and leakages are to be reported to regulators immediately.
6.4b Reporting of Spills (regular reporting)	Conformance	The Facility has established procedures to publicly disclose Impact Assessments of any spills and remediation actions taken, and report publicly on an annual basis. Accidental spills are included in the Annual Report to the Environment Agency: <a href="https://www.norskeutslipp.no/en/Miscellaneous/Company/?CompanyID=5310">https://www.norskeutslipp.no/en/Miscellaneous/Company/?CompanyID=5310</a> .
6.5a Waste management and reporting (strategy)	Conformance	The Facility has established good practices to mitigate the generation of wastes and reuse or recycling of wastes. Alcoa Lista also participates in research and development projects with the aim to reduce wastes. Waste generated is reported to the authorities using the web portal: <a href="https://www.avfallsdeklarering.no/">https://www.avfallsdeklarering.no/</a> .
6.5b Waste management and reporting (disclosure)	Conformance	Alcoa Lista discloses its annual generation of waste and hazardous waste in its Annual Report to the Norwegian Environment Agency:

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		https://www.norskeutslipp.no/en/Miscellaneous/Company/?CompanyID=5310. Waste generation from the Facility is also included in the Alcoa Sustainability Report from page 77 to 80: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity has implemented robust systems and management related to Spent Pot Lining, SPL handling. The operation is indoors with no release of SPL or leakage to the environment. The sorted fractions are transported to the national treatment plant and landfill for dangerous waste, NOAH Langøya. All quantities are registered and declared in the national registry: <a href="https://www.norskeutslipp.no/en/Miscellaneous/Company/?CompanyID=5310.">https://www.norskeutslipp.no/en/Miscellaneous/Company/?CompanyID=5310.</a>
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity separates different fractions from the demolition of old pots. Carbon, steel, metal pot and refractory materials are separated in the demolition process and each fraction is stored and transported as described in 6.7a. Iron and other metals are reused or recycled.  Alcoa and other industry actors in Norway are working in a joint research program to improve the SPL handling and find permanent solutions on recycling of SPL.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Facility does not landfill Untreated SPL where there is the potential for adverse environmental effects. SPL is treated by a partner company and landfilled at NOAH Langøya as described in 6.7a.

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6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity is continuously working to find permanent solutions to recycle and not landfill Spent Pot Lining. A joint Industry project in Norway, where the Entity is a major player, has been initiated. The primary objective of the research project is to develop a sustainable process for material recycling of SPL with high value products.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	Spent Pot Lining, SPL, is stored indoors at the Facility and is transported to NOAH at Langøya, an approved landfill for hazardous waste in Norway.  No SPL is discharged to marine or aquatic environments.
6.8a Dross (recovery)	Conformance	The Facility maximizes the recovery of Aluminium by treatment of Dross and Dross residues. The Facility recovers aluminium from Dross internally with use of drip pans, and externally in cooperation with an external Dross processor supplier. All recovered aluminium from Dross by external supplier is returned to the site and recycled at Lista.  There are procedures in place for internal treatment of Dross.
6.8b Dross (recycling)	Conformance	The Entity remelts 100% of the recovered aluminium from Dross returned from the Dross processor.
6.8c Dross (review of alternatives)	Conformance	The Entity recovers Aluminium from Dross with an external partner. No Dross residue is landfilled and by-products from the recovery process are sold externally.
PRINCIPLE 7 WATER	STEWARDSHIP	
7.1a Water assessment (mapping)	Conformance	The Facility has established good procedures to map and monitor its water use by source. There are 3 sources of water used at the Facility; industrial water for process cooling, seawater for cleaning of Emissions to Air (SO <sub>2</sub> scrubber) and potable water. All sources are mapped and reported.
7.1b Water assessment (risk assessment)	Conformance	The Facility has risk assessed its water withdrawal and use based on type and source in its Area of Influence. In 2019 all operating locations in the company evaluated the water-related risks using the water scarcity tool (World Resources Institute's Aqueduct tools).
7.2a Water management (management plans)	Not Applicable	This Criterion has been rated as not applicable due to the Low-Risk level identified during the risk assessment.
7.2b Water management (monitoring)	Not Applicable	This Criterion has been rated as not applicable due to the Low-Risk level identified during the risk assessment.
7.3 Disclosure of water usage and risks	Conformance	Water withdrawal and use is monitored and disclosed by the Entity. Water level for process water and Sea water use for scrubber is monitored continuously. Water use at the Facility is

CRITERION	RATING	COMMENT
		also a part of the risk assessment. Water scarcity is not a problem in the Area of Influence and water use for process water at the Entity does not represent a risk for the Facility, nor surrounding areas. Reporting on water withdrawal and use and disclosure of material water-related risks is done through the corporate Annual Sustainability Report (page 81-84): <a href="https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf</a> .
PRINCIPLE 8 BIODIVE	RSITY	
8.1 Biodiversity assessment	Conformance	The Facility has undertaken a comprehensive biodiversity risk assessment and a prioritized action plan has been established. The Entity has engaged third parties like NIVA and NILU to map environmental impacts of the seabed in Husebybukta and moss in surrounding vegetation.
8.2a Biodiversity management (Biodiversity Action Plans)	Conformance	The Facility has undertaken a biodiversity risk assessment of its Area of Influence and concluded on a prioritized action plan. The Entity has engaged third parties like NIVA and NILU to map environmental impacts of the seabed in Husebybukta in accordance with the EU water framework directive and on moss in surrounding vegetation of the Facility.
8.2b Biodiversity management (Consultation and mitigation hierarchy)	Conformance	The Facility has undertaken a biodiversity risk assessment of its Area of Influence and concluded on a prioritized action plan. The Entity has engaged third parties like NIVA and NILU to map environmental impacts of the seabed in Husebybukta in accordance with the EU water framework directive and on moss in surrounding vegetation of the Lista smelter. The Biodiversity Action Plan has been designed in accordance with the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Conformance	Alcoa Lista has performed a comprehensive mapping of its biodiversity risks through a Facility specific assessment and third party surveillance programs of Husebybukta and surrounding areas. Alcoa has a Sustainability Report which is available to the public at the website: <a href="https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf</a> .
8.3 Alien Species	Minor Non- Conformance	The Facility has performed a Biodiversity risk assessment and evaluated the risk of introduction of Alien Species to its surrounding area. Alcoa corporation has developed and published a Sustainability Report, covering all its facilities and production processes worldwide: <a href="https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf</a> .  A Non-Conformance was issued regarding the Entity's risk assessment, also to evaluate other means of introduction of Alien Species besides Alien Species introduced from ballast water regarding oversea transportation, i.e. related to other

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		means of transport, purchase of raw materials and goods or the use of wooden pallets.	
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
8.5a Mine Rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
8.5b Mine Rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
PRINCIPLE 9 HUMAN RIGHTS			
9.1a Human Rights Due Diligence (Policy)	Conformance	The Entity has established a Human Rights Policy in English <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy/human-rights-policy-no.pdf</a> . Alcoa's Sustainability Report for 2019 has a section on the UN sustainable development goals (pages 17-20): <a href="https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf</a> .	
9.1b Human Rights Due Diligence (Process)	Conformance	The Entity shows good practice in this area. A Human Rights Due Diligence Process was implemented to identify potential risks and implement actions to eliminate or minimize these. The scope involved the identification of risks and impacts, remediation, grievance mechanism, reporting and feedback, on the following topics: working and labour conditions, safety, land management, integrity, health, safety and environment, relationships with Communities, suppliers and customers.	
9.1c Human Rights Due Diligence (remediation)	Not Applicable	The Alcoa Lista Facility has not caused or contributed to adverse Human Rights impacts. Alcoa Corporation has demonstrated that policies are in place in order to cooperate in the remediation through legitimate processes where this is an issue.	
9.2 Women's Rights	Conformance	The Entity's Code of Conduct clearly encourages diversity among its employees. Alcoa Lista has a target of increasing female employees to obtain a better gender balance among its staff and has introduced various measures in order to increase	

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		the number of female employees and female leaders. Measures like a Global inclusion and diversity council have been established on corporate level.
9.3 Indigenous Peoples	Not Applicable	The Criterion is not applicable since there are no Indigenous Peoples in the Lister region in Norway where the Entity operates.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	The Criterion is not applicable since there are no Indigenous Peoples in the Lister region in Norway where the Entity operates.
9.5 Cultural and sacred heritage	Not Applicable	There are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	There are no Indigenous Peoples in the Lister region in Norway where the Entity operates. The Entity started to operate on the industrial site for many years back and there are no resettlement obligations existing and no plans for further expansion of the Entity operating site.
9.6b Resettlements (where unavoidable)	Not Applicable	There are no Indigenous Peoples in the Lister region in Norway where the Entity operates. The Entity started to operate on the industrial site for many years back and there are no resettlement obligations existing and no plans for further expansion of the Entity's operating site.
9.7a Local Communities (rights and interests)	Conformance	The Entity's Community engagement and CSR reporting guidelines demonstrate respect to legal and customary rights and interests of Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity's Code of Conduct clearly states that the Entity takes appropriate steps to prevent and address any adverse impact on Local Community.  There is a close cooperation with the Community through direct meetings with representatives from Farsund municipality and Alcoa actively recruits Workers that are unemployed or need work training.
9.7c Local Communities (livelihoods)	Conformance	The Entity has a proactive approach of working with Local Communities and neighbourhood organizations to improve and support mutual interests. The organisation explores with the Local Community opportunities to respect and support their livelihoods through for instance communication with the Community and local schools, sports clubs and NGOs.
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	Alcoa Lista is located in Norway, a country where an armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas is not relevant.  At a corporate level, Alcoa implemented a supply chain Due Diligence programme to further manage risk from the supply

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		chain related to the areas of Anti-Bribery and Corruption, trade compliance, child and slave labour, criminal history, Human trafficking and conflict minerals.
9.9 Security practice	Conformance	The Facility has established good practices in this area.  Security staff work according to the Alcoa Code of Conduct and are trained on site in line with Alcoa Principles.
PRINCIPLE 10 LABOU	R RIGHTS	
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	The Facility respects the rights of Workers to associate freely in Labour Unions and cooperates actively with the Workers' unions.
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	The Facility respects the rights of Workers to Collective Bargaining, and participates in Collective Bargaining Processes with Workers' representatives.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	There is no law in Norway that restricts the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	There is no employment of Workers under the age of 17 years. The Entity's Human Rights Policy and Code of Conduct both prohibit the use of Child Labour.
10.2b Child Labour (hazardous)	Conformance	The Facility does not use, nor support, the use of Child Labour. There's no employment of Workers under the age of 17 years. The Entity's Human Rights Policy and Code of Conduct both prohibit the use of Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Facility does not use, nor support, the use of Child Labour. There's no employment of Workers under the age of 17 years. The Entity's Human Rights Policy and Code of Conduct both prohibit the use of Child Labour.
10.3a Forced Labour (Human trafficking)	Conformance	The Entity does not participate in or support Human trafficking, either directly or through any employment or contracting agencies. A Human Rights Policy is implemented and Contractors are regularly followed up through supplier audits and questionnaires.
10.3b Forced Labour (deposits, fees, advances)	Conformance	There is no requirement in any Labour Agreement, employee handbook or agreement with a recruiting firm that requires the employees to pay any type of fee or advance. This practice is not allowed according to Norwegian regulation.  No incidents were found at the Facility. No deposits are held, no recruitment fees are paid.

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10.3c Forced Labour (Migrant Workers)	Conformance	No incidents of Forced Labour were found at the Facility. No Migrant Workers are hired.
10.3d Forced Labour (Debt Bondage)	Conformance	No incidents were found at the Facility. The Entity does not engage in, nor support the use of Forced Labour.
10.3e Forced Labour (freedom of movement)	Conformance	No incidents were found at the Facility. Workers are free to leave their working places. The Entity does not have any onsite housing for Workers.
10.3f Forced Labour (retention of identity papers, permits, Certificates)	Conformance	The Entity does not retain any original copies of Workers' papers.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Conditions of termination of working contracts are defined by law, Collective Bargaining Agreements and are described in personal Worker contracts.
10.4 Non-Discrimination	Conformance	No discrimination was found during audits and interviews at the Entity's sites. The Entity has developed and implemented an Equal Employment Opportunity Policy addressing zero tolerance to discrimination and a Human Rights Policy is available on the web: <a href="https://www.alcoa.com/global/en/careers/pdf/Alcoa-EEO.pdf">https://www.alcoa.com/global/en/careers/pdf/Alcoa-EEO.pdf</a> , <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp</a> .  Recently, Alcoa has established a Global inclusion and diversity council on a corporate level.
10.5 Communication and engagement	Conformance	The Entity has an open and inclusive communication between management, Workers and unions. The Entity has an open and inclusive communication with systems in place to raise concerns, report non-conformities and for improvement suggestions.  Open meetings for all employees are held regularly by the plant management.  Several committees, for instance Occupational Health Committee and union-management joint committee, have regular meetings.
10.6 Disciplinary practices	Conformance	Alcoa corporate standard, values and Code of Conduct are important guidance and rules related to disciplinary practice: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code Conduct English.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code Conduct English.pdf</a> page 9,12 and 13. In addition, the local company regulations and Norwegian legislation (Working Environmental Act) are complied with.
10.7a Remuneration (living wage)	Conformance	The Entity pays wages according to Agreements with appropriate Labour Unions. The Workers interviewed expressed

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		general satisfaction with the salary levels at the Entity. A tariff Agreement between management and unions exists.
10.7b Remuneration (method of payment)	Conformance	Payments of wages are conducted monthly in a punctual manner. All Workers receive payslips with payment details.
10.8 Working Time	Conformance	Different shift models are in place at the Facility. These have been approved through collective Agreements and are according to Norwegian law. The Entity follows-up closely on Working Time and has good systems in place to follow overtime use. Public holidays and Annual leave are remunerated according to Norwegian law.
PRINCIPLE 11 OCCUP	PATIONAL HEAL	TH AND SAFETY
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	The Facility has developed, implemented and communicated a Health and Safety Policy endorsed and supported by senior management through provision of resources.
11.1b Occupational Health and Safety (OH&S) Policy (Workers and Visitors)	Conformance	The Entity's Policy on Health and Safety is communicated in several ways. For instance, visually on boards and through training and contracts with external Stakeholders. A Safety video is mandatory to view for all Contractors and Visitors entering the site. A Management System secures the implementation and communication of the Policy.
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and Standards)	Conformance	The Entity's Policy on Health and Safety addresses that safe work is always most important, as well as a commitment to comply with all Applicable Laws and regulations: <a href="https://www.alcoa.com/sustainability/en/pdf/EHS-Values-Policy-Principles.pdf">https://www.alcoa.com/sustainability/en/pdf/EHS-Values-Policy-Principles.pdf</a> .
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's Policy on Health and Safety addresses the importance that safe work is always most important and all employees have the right to understand the hazards and safe practices of their work, and the authority to refuse or stop unsafe work. The Policy and values are available on the web:  https://www.alcoa.com/sustainability/en/pdf/EHS-Values-Policy-Principles.pdf https://www.alcoa.com/global/en/who-we-are/values/default.asp.
11.2 OH&S Management System	Conformance	The Facility has a documented and implemented Occupational Health and Safety Management System that is in Conformance with the Norwegian legislation "Internal control regulations".
11.3 Employee engagement on health and safety	Conformance	The Facility follows good industry practice on Occupational Health and Safety with close cooperation between management and the employees. Several committees on health and safety are established at the site. Health and safety is always the first point on the agenda in all meetings.

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11.4 OH&S performance	Conformance	The Entity evaluates its Occupational Health and Safety performance regularly and several Key Performance Indicators (KPIs) are addressed on Occupational Health and Safety. The Entity has several tools for evaluation of performance and continuous improvement.

#### **Document Control and Version History**

Revision	Date	Notes
0	18 November 2020	Issued (Initial Certification)