

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

ALCOA CORPORATION

CERTIFICATE
NUMBER

72

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES
UK LTD.

DATE OF ISSUE

31 JANUARY 2020

DATE OF EXPIRY

30 JANUARY 2023

CERTIFIED SINCE

31 JANUARY 2020

AUTHORISED BY

A white handwritten signature on a dark grey background.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

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

CERTIFICATION SCOPE

The ASI CoC Scope for Alcoa Corporation is compounded by 14 facilities globally, included in 10 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 the engineering, planning, central maintenance and anode rodding. (Fjarðaál - Iceland); 8 - Alcoa Lista, including the development and production of aluminium extrusion ingots, foundry metal and manufacture of anode briquettes. (Lista - Norway); 9- Alcoa - Aluminerie de Bécancour Inc., including Aluminum Smelting, Casthouse and administrative associated facilities; and 10 - Alcoa - Aluminerie de Deschambault S.E.C., including Aluminum Smelting, Casthouse and administrative associated facilities.

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME Alcoa Corporation

ENTITY NAME Alcoa Corporation

CERTIFICATION SCOPE

The ASI CoC Scope for Alcoa Corporation is compounded by 14 facilities globally, included in 10 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);
- 8 - Alcoa Lista, including the development and production of aluminium extrusion ingots, foundry metal and manufacture of anode briquettes. (Lista - Norway);
- 9 - Alcoa - Aluminerie de Bécancour Inc., including Aluminum Smelting, Casthouse and administrative associated facilities; and
- 10 - Alcoa - Aluminerie de Deschambault S.E.C., including Aluminum Smelting, Casthouse and administrative associated facilities.

SUPPLY CHAIN ACTIVITIES

- Bauxite Mining
 - Alumina Refining
 - Aluminium Smelting
-

	<ul style="list-style-type: none"> 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) Surveillance and Scope Change Audit (8 – 10 June 2021)
AUDIT FIRM	DNV Business Assurance Services Ltd.
AUDIT DATE	<ul style="list-style-type: none"> 5 November – 13 December 2019 (Initial Certification Audit) 3 – 23 September 2020 (Scope Change Audit) 8 – 10 June 2021 (Surveillance and Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"> 11 January 2020 (Initial Certification Audit) 31 October 2020 (Scope Change Audit) 9 July 2021 (Surveillance and 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 – 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> <p><u>Surveillance and Scope Change Audit (8 – 10 June 2021)</u></p>

The Audit Scope covered the following facilities:

- 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, Bécancour and Deschambault) and Europe (San Ciprián in Spain and Mosjøen and Lista in Norway and Fjarðaál in Iceland).

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses

All relevant criteria in the ASI Chain of Custody Standard were included in the Audit Scope.

At the time of the audit (June 2021), access to the sites was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

AUDIT
OUTCOME

- 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

31 January 2020 – 30 January 2023

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

30 January 2023

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</p> <p>and the 2020 Annual Report, page 2: https://alcoa.g4cdn.com/375357455/files/doc_financials/2020/ar/Alcoa-2020-Annual-Report-Final-Bookmarked.pdf</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 aware of and competent in their responsibilities under the ASI Chain of Custody (CoC) Standard.</p>

CRITERION	RATING	COMMENT
		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)	Conformance	Alcoa reports the Input and Output Quantities of ASI CoC Material to the ASI Secretariat on an annual basis. The latest annual report and underlying mass balance calculations were reviewed during the audit.
1.7b Reporting to ASI (Input Percentage)	Conformance	Alcoa reports the Input Percentages for its ASI Bauxite, ASI Alumina, ASI Liquid Metal, ASI Cold Metal and Eligible Scrap on an annual basis to the ASI Secretariat. The mass balance calculations were reviewed during the audit to support the reported figures.
1.7c Reporting to ASI (Positive Balance)	Conformance	Alcoa did not carry over a Positive Balance in the reporting period.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	Alcoa did not have an Internal Overdraw in the Material Accounting Period.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	Alcoa reported Eligible Scrap which originated from Mosjøen and Lista Metal Flows, constituted of recovered aluminium quantities from dross and dross residues as well as pre-consumer scrap subject to due diligence.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	At the time of the audit, Alcoa did not engage in the ASI Credit system.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	At the time of the audit, Alcoa did not engage in the ASI Credit system.
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.

CRITERION	RATING	COMMENT
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.
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	<p>Alcoa Juruti (Brazil), Huntly and Willowdale Mines (Australia) are under the operational control of Alcoa. Please see: https://www.alcoa.com/global/en/who-we-are/locations/default.asp</p> <p>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 the 2020 Annual Report, page 7: https://alcoa.q4cdn.com/375357455/files/doc_financials/2020/ar/Alcoa-2020-Annual-Report-Final-Bookmarked.pdf</p>
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	<p>The Alumina Refineries Alumar (São Luiz), Kwinana, Pinjarra and Wagerup are included in Alcoa's CoC Certification Scope.</p> <p>With regards to the Alumar Refinery, AWA Brazil is part of the AWAC group of companies and is ultimately owned 60% by Alcoa and 40% by Alumina Limited. The ownership model is reflected in Alcoa's Mass Balance System. Please see Alcoa's 2020 Annual Report, page 9: https://alcoa.q4cdn.com/375357455/files/doc_financials/2020/ar/Alcoa-2020-Annual-Report-Final-Bookmarked.pdf</p> <p>Alcoa's Western Australia refinery operations, Kwinana, Pinjarra and Wagerup are under the operational control of Alcoa. Please see: https://www.alcoa.com/global/en/who-we-are/locations/default.asp</p> <p>The Entity's Material Accounting System ensures that these are the only facilities where ASI Alumina is produced.</p>

CRITERION	RATING	COMMENT
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: <ul style="list-style-type: none"> - San Ciprián Smelter (Spain) - Baie-Comeau Smelter (Canada) - Mosjøen Smelter (Norway) - Fjarðaál (Iceland) - Lista (Norway) The sites are under Alcoa's operational control: https://www.alcoa.com/global/en/who-we-are/locations/default.asp 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.
3.3b ASI Performance Standard – Aluminium Smelting	Conformance	Alcoa San Ciprián, Baie-Comeau, Mosjøen, Lista and Fjarðaál facilities and Alcoa's Aluminerie de Bécancour (ABI) and Deschambault facilities are included under Alcoa's ASI Performance Standard Certification Scope. At the time of the CoC audit, Alcoa's Aluminerie de Bécancour (ABI) and Deschambault facilities were undergoing ASI Performance initial certification audit and the completion of the ASI oversight assessment process.
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Conformance	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 Ciprián, Alcoa Mosjøen and Alcoa Lista are enabled to receive and remelt external scrap; and they are included in the scope for ASI Chain of Custody Certification.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	Alcoa San Ciprián, Alcoa Baie-Comeau, Alcoa Mosjøen and Alcoa Lista facilities are engaged in producing Recycled Aluminium within Alcoa's CoC scope. All of these facilities are certified against the ASI Performance Standard. Please see below references to the public audit reports:

CRITERION	RATING	COMMENT
		<ul style="list-style-type: none"> - ASI PS Certificates issued for San Ciprián #39 and Baie-Comeau #45 - ASI PS Certificates issued for Mosjøen #71 - ASI PS Certificates issued for Lista #103
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>
4.2b Post-Consumer Scrap	Not Applicable	Post-Consumer Scrap is not accounted for as Eligible Scrap by Alcoa's Material Accounting System.
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	<p>The Smelters San Ciprián, Baie-Comeau, Mosjøen, Aluminerie de Bécancour and Deschambault are included on 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</p>
5.1b ASI Performance Standard – Casthouses	Conformance	San Ciprián, Baie-Comeau and Mosjøen Smelters, and Fjardaal and Lista Casthouses are ASI Performance Standard certified. Aluminerie de Bécancour and Deschambault 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

CRITERION	RATING	COMMENT
		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	This Criterion is not applicable to the Entity's Certification Scope.
6.1b ASI Performance Standard – Post-Casthouse	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1c Sourcing ASI Aluminium	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards Alco's Supplier Standards have been reviewed and updated as of January 2021. Supplier expectations have expanded inline with Alcoa's own commitments to advance sustainably. Alcoa Corporation's Anti-Corruption Policy is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption 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
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	Alcoa established global Supplier Standards which enhances responsible sourcing requirements. Please see sections "Act with Integrity" - page 3 and "Operate with Excellence" - page 4 of Alcoa's Supplier Standards: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards 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
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	Alcoa established global Supplier Standards which addresses issues related to human rights due diligence. Please see sections "Act with Integrity" - page 3 and "Operate with Excellence" - page 4 on the Supplier Standards:

CRITERION	RATING	COMMENT
		<p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards</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> <p>Please see below link to access Alcoa's Human Rights Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	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.
7.2 Risk assessment	Conformance	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 ongoing monitoring via 360 watch. Alcoa regularly reports on the outcomes of these measures to senior management. A sample of Non-CoC Suppliers (including suppliers of sows from dross recovery, and scrap materials) were reviewed and due diligence checks were verified during the audit.
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 Aluminerie de Deschambault S.E.C. and Aluminerie de Bécancour inc., CoC Input and Output Quantities

CRITERION	RATING	COMMENT
		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	Sows from dross recovered for in-scope Casthouses (Mosjøen, Lista) were designated 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. The process was defined by Alcoa's ASI Chain of Custody Standard Manual.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	Alcoa calculated Input Percentage using Eligible Scrap as per ASI Criterion.
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. The Output Quantities did not exceed the Input Quantities during the Material Accounting Period in 2020/21.
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). A sample of transaction reports have been cross-checked to ASI CoC Documents to verify the process.
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

CRITERION	RATING	COMMENT
		defined the Output Quantities of Eligible Scrap. Alcoa designated internal scrap as Eligible Scrap produced at in-scope entities on its Material Accounting System.
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 have been trained to carry out the reconciliation tasks and Alcoa also ensures senior management oversight of the data, including internal verification of the data. Mass balance quantities were reviewed for the 2020 Material Accounting Period with sample checks to source.
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 Reconciliation spreadsheets 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 (Mar - Dec 2020 and Jan - Mar 2021).
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, reconciling the Input and Output Quantities of CoC and Non-CoC Materials. The reviews will have senior management oversight to internally validate the data. There were no Internal Overdraws during the Material Accounting Period reviewed at the surveillance audit (March - December 2020 and January - March 2021)
8.11a Positive Balance (carry over)	Conformance	The ASI Global Implementation Team conducts quarterly reviews of the Mass Balance System, reconciling the Input and Output Quantities of CoC and Non-CoC Materials. The reviews have senior management oversight to internally validate the

CRITERION	RATING	COMMENT
		data. Alcoa does not carry a Positive Balance to the consecutive Material Accounting Period.
8.11b Positive Balance (expiry)	Conformance	The ASI Global Implementation Team conducts quarterly reviews of the Mass Balance System, reconciling the Input and Output Quantities of CoC and Non-CoC Materials. The reviews have senior management oversight to internally validate the data. Alcoa did not carry a Positive Balance over to the consecutive Material Accounting Period.
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 a sample of CoC documents and interviews with personnel. A sample of transaction records were cross-referenced to the accompanying CoC Documents for ASI Bauxite, ASI Alumina and ASI Aluminium. Alcoa includes CoC information in the accompanying CoC Document to other CoC Certified Entities. A sample of transaction reports were crossed checked to CoC Documents and commercial invoices to test the CoC quantities included in the Mass Balance System are accurate.
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.
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.

CRITERION	RATING	COMMENT
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 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	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.3c Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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 are responsible for handling the CoC requests from customers, aligned to Alcoa's Quality System Management System. Relevant personnel were trained on their duties under the ASI Chain of Custody 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.
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 customer care 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, including intercompany transactions.
10.2 Verify consistency with shipments	Conformance	Alcoa established controls to regularly check the consistency of the CoC Documents before recording information in the Oracle ERP Material Accounting System.
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.
10.4 Error management	Conformance	Alcoa has developed an error management procedure which is integrated into its current complaints mechanism and error management system on Oracle. 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. - Rootcause identification - Corrective Action

CRITERION	RATING	COMMENT
		- 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.
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.

CRITERION	RATING	COMMENT
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. A sample of claims and associated approval processes were reviewed during the audit to check the effectiveness.
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). All claims are approved by Marketing and/or Sustainability senior representatives prior to issuance.
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.
2	11 August 2021	Surveillance Audit and Scope Change Audit to incorporate Alcoa Aluminerie de Bécancour Inc and Aluminerie de Deschambault S.E.C.