
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**ALCOA -
ALUMINERIE DE
DESCHAMBAULT
S.E.C**

CERTIFICATE
NUMBER

148

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES
UK LTD.

DATE OF ISSUE

10 AUGUST 2021

DATE OF EXPIRY

9 AUGUST 2024

CERTIFIED SINCE

10 AUGUST 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', written over a white background.

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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

Aluminum Smelting, Casthouse and administrative
associated facilities at Aluminerie de
Deschambault (Canada).

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa - Aluminerie de Deschambault S.E.C
CERTIFICATION SCOPE	Aluminum Smelting, Casthouse and administrative associated facilities at Aluminerie de Deschambault (Canada).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	25 – 27 May 2021
AUDIT REPORT SUBMISSION	17 July 2021
AUDIT SCOPE	<p>The audit scope included Aluminum Smelting, Casthouse and administrative associated facilities at Alcoa – Aluminerie de Deschambault (Canada).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

10 August 2021 – 9 August 2024

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

9 August 2024

CERTIFICATE
NUMBER

148

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Alcoa's Legal department consists of in-house counsel who are qualified lawyers in the main jurisdictions where Alcoa has operations and are responsible for maintaining awareness and, together with Alcoa's Ethics & Compliance organization, for ensuring compliance with applicable laws.
1.2 Anti-Corruption	Conformance	To ensure fighting against corruption, Alcoa has established and implemented a Code of Conduct and an Anti-Corruption Program and Policy that can be accessed on Alcoa website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance Employees most exposed follow specific training courses offered by the corporation. An integrity line to denounce practices that do not meet the Code of Conduct and/or the Anti-corruption program is in place and published to the following link: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line
1.3 Code of Conduct	Conformance	The Alcoa Code of Conduct is a corporate policy covering business integrity, business activities, conflicts of interest, anti-corruption, relations with customers and suppliers, and compliance with Human Rights. The Code of Conduct is reviewed regularly and is available in English and French at the following link: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct.asp
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	Alcoa's quality, environment, energy and health and safety policy has been approved and signed by management. The policy is accessible to all employees. It is an integral part of Alcoa's management systems (Quality, environment, energy and health and safety). Alcoa's management systems are ISO 14001:2015 and ISO 9001 certified. The policy integrates the HSE, social and governance aspects.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Corporate Governance Guidelines define the way Alcoa Corporation does business. It starts with its Values and Business Conduct Policies. In

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		<p>addition, a specific Committee of the Board has been formed to provide guidance on matters relating to the Company's corporate and social responsibility, including but not limited to safety and health, good corporate citizenship, environmental sustainability, and social issues.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>Alcoa's policies and procedures related to Environmental, Social and Governance aspects are mainly communicated externally through their website, contracts and internally through their hiring processes. For policies please see: http://investors.alcoa.com/corporate-governance/governance-documents https://www.alcoa.com/global/en/who-we-are/values/default.asp https://www.alcoa.com/sustainability/en/environment-health-safety.asp https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp</p>
2.2 Leadership	Conformance	<p>The Entity's General Manager, as leader for ASI certification, has overall responsibility and authority to ensure conformity with ASI requirements. The role regularly informs all employees on the importance of certification and is supported by other managers.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>Alcoa Deschambault has a documented, ISO 14001:2015 certified environmental management system.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has implemented a Social Management System that identifies each social stakeholder, assesses social and community impacts to them and draws up projects and strategies to address them.</p> <p>A Community Consultation Committee is in place to ensure identification of stakeholders needs and expectations and the Entity activities impacts on them. The Alcoa fund is available to help social and community projects. Details can be found at the following link: https://www.alcoa.com/canada/fr/engagement/fund</p>
2.4 Responsible Sourcing	Conformance	<p>Alcoa implemented a global Supplier Sustainability Program for its supply chain. The program provides due diligence of, and insight into, the environmental, social and governance performance of key suppliers and a framework to</p>

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		work with them to advance sustainability. The Sustainability Program can be found at: https://www.alcoa.com/sustainability/en/communities/supply-chain
2.5 Impact Assessments	Conformance	Alcoa has developed environmental aspects and impacts assessments in all plants. The methodology is based on ISO 14001:2015. All major projects must go through an impact study according to regulatory requirements. These impact studies must include environmental, social and economic impact assessment of the project. Any capital expenditure (CAPEX) project goes through a documented Health-Safety Environment review process that include social, cultural and stakeholders impact assessment. No major changes have taken place since the start of Entity activities.
2.6 Emergency Response Plan	Conformance	An effective Emergency Response Plan is in place, which has been informed by stakeholder consultation and meets regulatory requirements.
2.7 Mergers and Acquisitions	Conformance	Alcoa has set a corporate process to Mergers and Acquisitions, and Divestitures and a Strategy for New Country Entry. Part of these processes is to conduct a Due Diligence on buyers/sellers that incorporates Environmental, Social and Governance aspects.
2.8 Closure, Decommissioning and Divestment	Conformance	Alcoa implemented and maintains an Environment, Health and Safety Assessments of Prospective Acquisitions and Divestitures process through its Environmental Management System.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity provides monthly data to the corporate body in regards with its financial, environmental, social and governance performance. The corporate team compile and publish the results through an annual sustainable development report. This report is available on the Alcoa website at the following link: https://www.alcoa.com/sustainability/en
3.2 Non-compliance and liabilities	Conformance	Alcoa Corporation's annual and quarterly reports are publicly available on the Company website, and discloses the Company's fines, judgments, penalties and non-monetary sanctions for failure to comply with applicable law, to the extent

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		material, any fines, judgments, penalties and non-monetary sanctions. Please see the link: http://investors.alcoa.com/sec-filings
3.3a Payments to governments (legal and contractual)	Conformance	<p>All payments to governments are taxes or tributes and are reported in the Annual Report, available on the website: https://alcoa.q4cdn.com/375357455/files/doc_financials/2020/ar/Alcoa-2020-Annual-Report-Final-Bookmarked.pdf</p> <p>For Alcoa Deschambault, only the payments required by regulation are made (such as authorization request, payment of sanitation certificate fees, payment of water withdrawal rights).</p> <p>Payments related to withholding taxes and employer contributions are managed by Alcoa Canadian Shared Services.</p>
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	<p>Complaints, comments and suggestions from employees and interested parties are managed by the Environment Department. The Department developed a communications register allowing the entry, processing and the response to the various internal and external communications requests received. The communication procedure also explains how to deal with these requests.</p> <p>Although it is the environmental sector that developed this complaint handling procedure, complaints can be of any type, environmental, social or ethical.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>Alcoa currently has a certified Environmental Product Disclosure (EPD) for the low-carbon product Ecolum. A Life Cycle Assessment (LCA) was conducted to support the EPD and is cradle to gate including impacts from the raw material supply, transportation to the manufacturer and manufacturing stages. Details on Ecolum can be found at: https://www.alcoa.com/sustainability/en/pdf/Ecolum.pdf</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>Customers are free to request the Life Cycle Assessment (LCA)/ Environmental Product Disclosure (EPD) to Alcoa. The EPD is also available online through the UL website at:</p>

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		<p>https://spot.ul.com/main-app/products/detail/5ad1f04355b0e82d946abb93?page_type=Products%20Catalog</p> <p>It is also referred to in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p> <p>Alcoa has developed a LCA for Bauxite and Alumina considering a cradle-to-gate approach and customers can request this information.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>Marketing materials for Ecolum reference the Environmental Product Disclosure (EPD). The Alcoa Sustainability Report also includes a link to the EPD, available at: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p>
4.2 Product design	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The managers take into account the reintroduction of waste in ovens. The computerized inventory takes into account, in the preparation of the furnaces, for example the various scrap available which could be added according to their specifications, and the alloys in the furnaces. Technical information can be added to the castings.</p> <p>Scrap collection is monitored daily via a KPI available at all times with the objective of minimizing the production of scrap. Additionally, another KPI is in place to track the reduction in scrap inventory.</p> <p>A plan is in place with the operators to reintroduce the waste.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>A complete computerized scrap inventory is available to provide the alloy, weight and size of each ingot. Tools are also available to validate the compatibility of the ingot in inventory versus the casting in progress.</p> <p>The Alcoa system records all the information related to the arrival of metal, the castings to be made, the available inventory and possible adjustments.</p> <p>There are also separate storage areas to prevent mistakes.</p> <p>Support is also given to all suppliers for any concerns or for general questions regarding Alcoa's Supplier Standards through the contact: SupplierSustainability@alcoa.com</p>

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4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>All of the smelting/casthouses operations are Primary Casthouses and are very far away from end consumers and, therefore, end-of-life management. Between Alcoa and final consumers, there are, at least, 3 to 4 other manufacturers.</p> <p>However, Alcoa is pushing end-of-life recycling through global external activities. They have been member of The Recycling Partnership, the biggest aluminium recycling organization in North America for many years. Alcoa Foundation has been a founding partner and contributed financially on an annual basis to their recycling programs, focused on post-consumer recycling all across the US. Details are available at: https://recyclingpartnership.org/funding-partners/</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>Alcoa is pushing end-of-life recycling through global external activities. They have been members of The Recycling Partnership, the biggest aluminium recycling organization in North America for many years. Alcoa Foundation has been a founding partner and contributed financially on an annual basis to their recycling programs, focused on post-consumer recycling all across the US. Detailed are available at: https://recyclingpartnership.org/funding-partners/</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>GHG emissions are publicly reported in three places:</p> <ul style="list-style-type: none"> 1 - Alcoa corporate for the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf 2- To the National Pollutant Release Inventory (NPRI), at the Canadian Federal Level. 3 - The Québec Atmospheric Emissions Inventory (IQÉA). <p>These three entities require different calculations and emission factors. Calculations used for the annual provincial return are verified annually by a third party.</p>
5.2 GHG emissions reductions	Conformance	<p>Alcoa has set itself GHG targets that are published annually in the Sustainability Report at the following link: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf</p>

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		<p>The Aluminum Smelter has set itself time-bounded targets for greenhouse gases and a goal of anode effect minutes per tank day. The GHG data and objectives are monitored monthly by the management committee. Actions related to these objectives are included in the operational plan. The externally published Sustainability Report includes both direct and indirect emissions.</p>
5.3a Aluminium Smelting (management system)	Conformance	<p>Site specific procedures are available to demonstrate how PFC emissions, carbon consumption, and fuel efficiency are controlled locally. There are processes in place to ensure that GHG performance is maintained.</p>
5.3b Aluminium Smelting (up to and including 2020)	Conformance	<p>Third party certification of Scope 1 and 2 emissions includes site roll-up of data. GHG emissions are already under 8 tonnes CO₂-eq per metric tonne Aluminium.</p>
5.3c Aluminium Smelting (after 2020)	Not Applicable	<p>Not applicable. Alcoa Deschambault started its activities in 1992.</p>
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>An inventory of air pollutant emissions exists. Emissions are reported annually according to provincial requirements and federal requirements. At the corporate level, certain programs are reported at monthly or quarterly frequencies, and certain data are automatically collected by the corporate body from production database.</p>
6.2 Discharges to Water	Conformance	<p>There is no direct discharge of process water in the environment. For new process water usage, rain water is accumulated so water is not pumped from the environment.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>An ISO 14001 Environmental Management System is implemented and includes a risk assessment that describes all major environmental events, including spills and leakage. Emergency measures plans (EMP) are in place to respond to these emergency situations that could affect the environment in order to specify how to react and how to intervene.</p>

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6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Processes are in place to manage emergencies, external communication, compliance controls. Monitoring programme in place to prevent and detect these spills and leakage. Emergency measures plans and incident management procedure exist; Investigation and corrective action process is in place to follow incidents and to prevent the incident from recurring or reduce the impact; Assessment of environmental aspects, risks and means of control process is in place.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The communication process, in case of an emergency, meets federal, provincial and Alcoa reporting requirements. The reporting rules to be followed are included in the incident management procedure and in the Emergency Plan.
6.4b Reporting of Spills (regular reporting)	Conformance	When an environmental incident is reported to government authorities, an investigation and analysis are required. The results of this investigation and the corrective actions are communicated. Government authorities may require additional analyzes, documentation or corrective actions to be undertaken. Major incidents are also declared in Alcoa's Sustainability Report at: https://www.alcoa.com/sustainability/en/pdf/2020-Sustainability-Report.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity as developed and implemented a waste management program in compliance with the Alcoa standard. The waste management program includes all waste generated by the plant and is up-to-date. Corporate and local objectives are in place that aim for the reduction of waste generated over time and several projects and avenues are identified in respect of the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Conformance	The quantity of Hazardous and Non-Hazardous Waste by disposal methods is publicly disclosed in the annual Sustainability Report of Alcoa and includes the Deschambault facility. The 2020 Sustainability Report is available at the link: https://www.alcoa.com/sustainability/en
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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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's waste management program with detailed waste roadmap defines the management of spent pot lining (SPL) from different sources. The government operating permit define specific legal requirements regarding the storage, inspection and disposal of SPL as well as a corporate standard.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The SPL management plan defines the management of spent pot lining (SPL) reduction from source to disposal. The SPL management plan aims at reducing the disposal of SPL at landfill. Operational activities are optimized to minimize the production of buried residues to make it possible to segregate the carbon and the refractory part at the source, allowing the Entity to manage them separately. Recycling avenues for SPL are currently being assessed.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Alcoa standard for SPL forbids the landfilling of untreated SPL and the Entity SPL management program ensures it complies. Supplier audits and environmental permit validation are performed to ensure all SPL are treated before being landfilled.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The SPL management program of the Entity details the current situation of SPL recycling opportunities for landfill alternatives. Recycling processes are assessed and the management program is updated at least annually.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The SPL management program of the Entity defines the storage and disposal requirements to ensure no SPL is discharged into marine or aquatic environments. The government

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		operation permit defines specific and strict legal requirements regarding the storage and disposal of SPL.
6.8a Dross (recovery)	Conformance	The process in place to transfer liquid aluminium from crucibles to the furnaces reduces the production of scum, which is in line with the hierarchy of waste management. Foam produced is sent to a transformer. The scum is sieved in order to reintroduce part of the scum generated to the plant process. All the scum from the foundry that is not reintroduced to the processes is sent to a recycler in order to recover as much aluminium as possible.
6.8b Dross (recycling)	Conformance	Alcoa Deschambault sends dross to its only supplier for the treatment of its scum because this supplier can recycle 100% of the by-product of the scum treatment. Alcoa's vision for its suppliers is to minimize the quantity of scum sent to them by reducing the production of scum generated, by maximizing the reintroduction of scum to the processes and by being on the lookout for new solutions for the treatment of scum.
6.8c Dross (review of alternatives)	Conformance	Alcoa Deschambault is awaiting the completion of the IndustriAl project where another Alcoa site is currently having its scum treated in order to reintroduce all the residues from the treatment of the scum to its processes. They are informed of this during regional weekly calls.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity defines a water balance sheet which identify and map each source of water, its use as well as all discharge points.
7.1b Water assessment (risk assessment)	Minor Non-Conformance	The Entity carried out a corporate water risk assessment and identified that it is located in a low water risk area, this assessment does not identify specific risks related to the water withdrawal and use on the watershed from facility activities.
7.2a Water management (management plans)	Conformance	The Entity did not identify any significant risk from water usage. However, a rainwater management program is implemented to identify and manage rainwater usage.

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7.2b Water management (monitoring)	Conformance	No water management plan is implemented thus no monitor of the effectiveness is required.
7.3 Disclosure of water usage and risks	Conformance	Under the Quebec Water Act, the water withdrawal of the Entity must be reported to the government annually. Detailed water metrics that contain water withdrawal, usage and discharge type are reported to Corporate on a quarterly basis. Annually, Alcoa disclose all water usage in Alcoa's Sustainability Report available at the following link: https://www.alcoa.com/sustainability/en
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A detailed biodiversity risk assessment has been conducted based on Entity's land use and activities to assess their impact on the identified area of influence.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The biodiversity management action plan and the documented risk assessment did not identify any material risk on the biodiversity. Thus no action plan is required to address significant risk. However, an action plan to mitigate risks that are already low as well as a time-bound targets has been documented and implemented.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The biodiversity management action plan and biodiversity risk assessment does not identify any material risk on the biodiversity. Thus no action plan is required to address significant risk.
8.2c Biodiversity management (reporting)	Conformance	The biodiversity risk assessment did not identify any material risk on the biodiversity, thus no action plan is required to address significant risk and no outcome need to be shared with stakeholders. The biodiversity risk assessment summary has been presented to relevant stakeholders.
8.3 Alien Species	Conformance	Maritime transport is considered to be the route with the greatest potential for the introduction of invasive alien species by ship transporting coke and alumina. International ships operating in Canadian waters are subject to laws and regulations relating to ballast water management

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		However, no potential introduction of Alien Species that could have significant adverse impacts on biodiversity has been identify within the area of influence and activities of the Entity
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	Alcoa has a Human Rights Policy which is publicly available on its website at the following link: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy
9.1b Human Rights Due Diligence (process)	Conformance	A Human Rights Due Diligence was performed and documented following the model established by the Danish Institute for Human Rights. It seeks to identify, prevent, mitigate and account for any issues that may need to be addressed. According to the outcome of the due diligence performed, no human rights issues are identified. A due diligence process is performed and reports periodically to the Executive Team on the progress.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has policies that allow anyone who feels aggrieved to address their point and to ensure it is taken care of. At the time of the audit, no adverse impact on human rights had been raised nor identified. However, if this was the case, the due diligence and the project process identify and implement an action plan to mitigate any adverse effect on human rights.
9.2 Women’s Rights	Conformance	The Equal Employment Opportunity Policy is available on the Alcoa's website at the following link:

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		<p>https://www.alcoa.com/global/en/careers/pdf/Alcoa-EEO.pdf</p> <p>Over the last years, the strategy and affirmative action on gender equity was strengthened through the Alcoa Women's Network actions.</p> <p>The Deschambault smelter also respects and applies the Charter of Rights and Freedoms of the government of Quebec.</p> <p>There are currently no charges or complaints regarding discrimination on the basis of sex. A diversity committee is also established that implements strategies to attract women to different positions as well as to have a work environment that is as inclusive as possible.</p>
9.3 Indigenous Peoples	Not Applicable	No presence of Indigenous Peoples or their lands, territories and resources is identified for the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	No presence of Indigenous Peoples or their lands, territories and resources is identified for the Entity.
9.5 Cultural and sacred heritage	Not Applicable	No presence of Indigenous Peoples or their lands, territories and resources is identified for the Entity.
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity does assess alternatives to avoid or minimize community displacement in case of expansion or operation modification projects. These assessments consider the environmental, social, cultural and financial risks, impacts, costs and benefits, as well as remediation measures applied for all jurisdictions through different legal and/or internal processes.</p> <p>The Entity's operations have always taken place on the site which was defined at the start of operations. No expansions have been undertaken and the nature of the operations remained unchanged.</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>There has been no resettlement since the establishment of the facility and therefore no situation where physical displacement occurred. In such a situation, Alcoa Deschambault will perform a social and environmental impact study in consultation and in cooperation with the affected parties and develop a Resettlement Action Plan.</p>

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9.7a Local Communities (rights and interests)	Conformance	Alcoa has a Stakeholder Engagement Process that all locations are required to follow to ensure positive stakeholder relationships and effective means for resolving community concerns. Annually, locations must complete a Dashboard to indicate adherence to the plan, and complete an annual Stakeholder Engagement Plan. A Community Consultation Committee is established to ensure identification of any stakeholder interests or impact on their livelihoods.
9.7b Local Communities (impacts)	Conformance	Alcoa has a Stakeholder Engagement Process that all locations are required to follow to ensure positive stakeholder relationships and effective means for resolving community concerns. The process includes a requirement to have a community complaint system in place to address issues raised by community members. Regarding the community, stakeholders are met regularly and Alcoa is very involved through the Alcoa Foundation and the Sustainable Communities Fund, through which several projects are set up with municipalities and citizens. Any citizen who wishes to make a complaint will find the procedure at: https://www.alcoa.com/global/en/contact/general
9.7c Local Communities (livelihoods)	Conformance	The Entity has not identified any issues affecting local Communities. However, the Entity is engaged in the community through various actions (Alcoa Foundation, Donations and Sponsorships and Fund for sustainable communities) to respect and support their livelihoods.
9.8 Conflict-Affected and High-Risk Areas	Conformance	Alcoa Corporation is committed to providing transparency into the supply chain, from original source to Alcoa, in accordance with applicable laws and regulations, including the U.S. Securities and Exchange Commission's conflict minerals rule implementing the Dodd-Frank Act to ensure it does not contribute to armed conflict or human rights abuses. Alcoa's Supplier Standards contains clauses with which suppliers need to comply and it is available at the following link: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards

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		The Entity operates in a very stable democratic and political context.
9.9 Security practice	Conformance	Alcoa security guard standards are available for review. Most contract guard agencies retained by Alcoa are regulated and licensed by the local regulatory authority. Local assessments are performed of sites and contract guard agencies to ensure compliance of standards. Currently there are no sites not in compliance with the standards as it relates to human rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity employees are not unionized. Working conditions are reviewed through committees on which the employees set salary scales and total compensation. Freedom of Association is covered by provincial and federal laws.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respect the rights of Workers to Collective Bargaining, participate in any collective bargaining process in good faith though the recommendations of the compensation committees must be approved by the management committee and by the corporate body, following the same model as a unionized factory.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Freedom of Association and the Right to Collective Bargaining are covered by provincial and federal laws in Canada and strictly enforced.
10.2a Child Labour (minimum age)	Conformance	The Entity has policy's, codes of conduct and procedures in place to ensure no Child Labour as defined in ILO Conventions C138 and C182 and Canadian law.
10.2b Child Labour (hazardous)	Conformance	Human Rights Policy and Code of Conduct both prohibit the use of Child Labour. Procedures on site were seen to be effective therefore there is no opportunity for child labour hazardous working.
10.2c Child Labour (worst forms)	Conformance	Human Rights Policy and Code of Conduct both prohibit the use of Child Labour. Procedures on site were seen to be effective therefore there is no opportunity for children to be involved in the Worst Forms of Child Labour.

CRITERION	RATING	COMMENT
10.3a Forced Labour (human trafficking)	Conformance	The Entity's Human Rights policy and Code of Conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. It does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity's Human Rights policy and Code of Conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. It does not require recruitment or other fees to be paid by worker.
10.3c Forced Labour (migrant workers)	Conformance	The Entity's Human Rights policy and Code of Conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. No deposits or security payments are required at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity's Human Rights policy and Code of Conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. No Workers are held in Debt Bondage or forced to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity's Human Rights policy and Code of Conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. There is no unreasonable restriction of the freedom of movement of Workers in the workplace. There is no on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity's Human Rights policy and Code of Conduct are implemented effectively through site procedures as well as procurement procedures and third party checks. There is no retention of original copies of Workers' identity papers, work permits or travel documents. A training record is kept in a system workers can access and there are no restrictions on worker access.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity's Human Rights policy and Code of Conduct are implemented effectively through site procedures and Workers have the freedom to terminate their employment at any time

CRITERION	RATING	COMMENT
		without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	The Entity has policies, a Code of Conduct and procedures in place that effectively ensure equal opportunities and it does not engage in or support discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any worker.
10.5 Communication and engagement	Conformance	The employees committee and the Entity as well as operating procedures and culture ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity has policies, a Code of Conduct and procedures in place to ensure no corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	The Entity's policy, Code of Conduct and procedures are effective in ensuring the rights of Workers to a living wage and ensuring that wages paid for a normal working week shall always meet at least a legal or industry minimum standard and are sufficient to meet the basic needs of Workers and to provide some discretionary income.
10.7b Remuneration (method of payment)	Conformance	The Entity makes wage payments that are timely, in legal tender and fully documented.
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	An up to date local EHS Policy is signed by the Plant Manager. The EHS Policy (health, safety, environment) discloses the values and commitments of management, particularly with regard to health and safety at work. It applies to plant personnel but also to subcontractors, various stakeholders and visitors. In order to implement its

CRITERION	RATING	COMMENT
		<p>commitments, management has put in place an organizational and operational structure.</p> <p>The policy is implemented and communicated through several activities.</p> <p>The EHS Policy is reviewed annually and approved by management.</p> <p>The EHS Policy can be consulted at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/ehs-vision-values-mission-and-policy</p>
<p>11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)</p>	<p>Conformance</p>	<p>The EHS Policy is posted at many places in the plant, including at the reception where each person or visitor who arrive on the site can consult it.</p> <p>The EHS Policy is available to external workers through the sub-contractor management system.</p> <p>As anybody who circulate on the site, Contractors have to completely apply and respect the EHS Policy.</p> <p>The EHS Policy is also publicly available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/ehs-vision-values-mission-and-policy</p>
<p>11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)</p>	<p>Conformance</p>	<p>The EHS Policy states that Alcoa complies with laws and set even higher standards for themselves and their suppliers. The EHS Policy is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/ehs-vision-values-mission-and-policy</p>
<p>11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)</p>	<p>Conformance</p>	<p>The EHS Policy specifically states that Workers have the right of refusal.</p> <p>The EHS Policy can be consulted at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/ehs-vision-values-mission-and-policy</p>
<p>11.2 OH&S Management System</p>	<p>Conformance</p>	<p>Alcoa Deschambault has a Health and Safety Prevention program for the management of occupational health and safety. This document is a legal mandatory and meets Province of Quebec regulation.</p>
<p>11.3 Employee engagement on health and safety</p>	<p>Conformance</p>	<p>Each sector of Alcoa Deschambault Plant has an occupational health and safety committee in which employees discuss, raise and correct</p>

CRITERION	RATING	COMMENT
		issues relating to occupational health and safety. These committees meet periodically. In addition to these sector committees, there is a Global Plant health and safety committee on which all the health and safety committees participate.
11.4 OH&S performance	Conformance	<p>Close monitoring of health and safety results is carried out every week by the management committee. Several tools help to track data and make them available to employees. Prevention activities are also monitored and help target actions to be taken to improve employee health and safety.</p> <p>A schedule is put in place every two years to evaluate each Health and Safety protocol. Critical protocols are evaluated every year.</p>

Document Control and Version History

Revision	Date	Notes
0	11 August 2021	Initial Certification Audit (Full Certification)