
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

ALCOA POÇOS DE CALDAS

CERTIFICATE
NUMBER

215

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

8 AUGUST 2022

DATE OF EXPIRY

7 AUGUST 2025

CERTIFIED SINCE

8 AUGUST 2022

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

Mining, Refinery, Casthouse and Aluminum
Powder facility in Brazil.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME Alcoa Corporation

ENTITY NAME Alcoa Poços de Caldas

CERTIFICATION SCOPE Mining, Refinery, Casthouse and Aluminum Powder facility in Brazil.

SUPPLY CHAIN ACTIVITIES

- Bauxite Mining
- Alumina Refining
- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion (Production and Transformation)

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Initial Certification Audit

AUDIT FIRM DNV Business Assurance Services UK Ltd.

AUDIT DATE 16 – 18 May 2022

AUDIT REPORT SUBMISSION 23 June 2022

AUDIT SCOPE The audit scope included the mining, refinery, casthouse and Aluminum powder facility of Alcoa Poços de Caldas (Brazil).

Supply chain activities included in the audit scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard were included in the audit scope.

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.
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CERTIFICATION
PERIOD

8 August 2022 – 7 August 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

7 February 2024

CERTIFICATE
NUMBER

215

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has a local department and a global corporate structure to manage the legal requirements applicable to its operations.</p> <p>The ethical conduct and compliance Policies are available at:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/international-trade-compliance-policy</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established an Anti-Corruption Policy approved by the Chief Executive Officer (CEO):</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has a documented Code of Conduct that is communicated to all Stakeholders. The Code of Conduct is available at:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity implements and maintains environmental, social and governance Policies consistent with the practices included in the ASI Performance Standard. The Policies are available at:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/ehs-vision-values-mission-and-policy</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity's environmental, social and governance Policies are approved by the plant General Manager.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has established a Management System Policy and published and communicated it to employees and Contractors. This Policy includes Quality, Productivity and Environmental, Health and Safety (EHS) aspects. For other social and</p>

CRITERION	RATING	COMMENT
		<p>governance issues, refer to the Global Human Rights Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy.asp and the Code of Conduct: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct.asp The Entity's Integrated Management System Policy is also printed and publicly displayed on the main gate (which the external people can access freely) and provided to local Stakeholders.</p>
2.2 Leadership	Conformance	The Entity has global and local managers to ensure that the ASI Performance Standard requirements are met.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has an integrated Environmental Management System and holds a valid certificate to ISO 14001:2015.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented and documented Environmental and Social Management Systems.
2.4 Responsible Sourcing	Conformance	<p>The Entity has established an adequate Responsible Sourcing Policy (Alcoa Suppliers Standards) to evaluate suppliers and subcontractors. The Policy is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards https://www.alcoa.com/brasil/pt/pdf/declaracao-responsabilidade-fornecedor.pdf</p>
2.5 Impact Assessments	Conformance	The Entity has environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for New Projects or Major Changes to existing facilities undertaken by the Entity.
2.6 Emergency Response Plan	Conformance	The Entity has demonstrated the implementation of Emergency Response Plans, including the participation of internal and external Stakeholders. Simulations and drills are conducted at periodic intervals to evaluate the effectiveness of these plans.
2.7 Mergers and Acquisitions	Conformance	The Entity has defined the corporate process for mergers, acquisitions and divestitures and a strategy for entering a new country.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has adequately defined the site closure plan containing all phases and investments required to close the site.

CRITERION	RATING	COMMENT
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has developed and publicly communicated the Alcoa Sustainability Report for 2021: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity has not received notifications, warnings, economic or operational sanctions for non-compliance with legal requirements applicable to its operations.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity undergoes annual corporate audits to ensure compliance. The Entity also has provisions regarding the communication of financial results in its internal policies. The Entity has implemented the Anti-Corruption Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption
3.3b Payments to governments (disclosure - bauxite mining)	Conformance	The Entity's consolidated financial statements show the amounts paid from consolidated operations in Brazil and are presented in accordance with the materiality levels used for disclosure. Information on the Entity's compliance and performance on financial and compliance issues is available on the website: https://investors.alcoa.com/investor-overview/default.aspx The Entity has implemented the Code of Conduct: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct . The Entity has implemented the Anti-Corruption Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has a local department and a global corporate structure to manage the legal requirements applicable to its operations. The ethical conduct and compliance Policies, including the complaints hotline, are available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption https://www.alcoa.com/global/en/who-we-are/ethics-compliance/international-trade-compliance-policy https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line
PRINCIPLE 4 MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major product lines for which Aluminium is considered or used, based on ISO 14040:2006 and ISO 14044:2006.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed the Life Cycle Assessment (LCA) for Bauxite and Alumina with a cradle-to-gate approach which is made available to customers upon request. For further information refer to the 2021 Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Information on LCAs for Bauxite and Alumina are available upon request. The publicly shared reports include underlying assumptions and system boundaries. For further information refer to the 2021 Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
4.2 Product design	Not Applicable	This Criterion is not applicable as the Entity is not involved in the design and development process, rather it provides standardised semi-fabricated products that are inputs for further specialised manufacturing (e.g., aluminium slugs).
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity monitors the generation of scrap from the Aluminium process within its operations and, when generated, allocates the scrap for collection, recycling and/or reuse.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented relevant procedures and has appropriate technical staff to ensure the proper classification and separation of Aluminium alloys for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity recycles products appropriately and has specific waste reduction targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity engages with local, regional, or national collection and recycling systems to support accurate measurements and efforts to increase recycling rates of its Aluminium-containing products. The Alcoa Foundation promotes actions and supports programs that create sustainable value for the communities where Alcoa operates. The Sustainability Report demonstrates the Entity's engagement with the recycling of products at End of Life: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf

CRITERION	RATING	COMMENT
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has published an annual technical report of Greenhouse Gas (GHG) Emissions data. The report is available at: https://registropublicodeemissoes.fgv.br/participantes/1664
5.2 GHG emissions reductions	Conformance	Alcoa has long-term strategic sustainability objectives that are integrated into all its businesses. The Entity participates in the GHG Protocol program and annually reports the emission and energy usage data on the Public Register of Emissions: https://registropublicodeemissoes.fgv.br/participantes/1664 The GHG (direct and indirect) Emissions reduction targets are aligned with the below 2° C decarbonisation path, to reduce GHG emissions intensity by 30 percent by 2025 and 50 percent by 2030 from a 2015 baseline: https://www.alcoa.com/sustainability/en/sustainability-at-alcoa/strategic-long-term-goals The Entity implements the Climate Change Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/climate-change-policy Information about the Entity's corporate strategy on air emissions is included in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity has a Policy on climate change: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/climate-change-policy/Climate-Change-Policy-EN.pdf The GHG Emissions data are published annually in the technical report: https://registropublicodeemissoes.fgv.br/participantes/1664

CRITERION	RATING	COMMENT
		<p>The Entity published a Sustainability Report demonstrating its commitment and action on climate change: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
6.2 Discharges to Water	Conformance	<p>The Entity has quantified, monitored and reported on Discharges to Water that may have adverse effects on humans or the environment.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has undertaken an assessment of the main risk areas of operations where Spills and Leakages can contaminate the air, water and/or soil through the Environmental Aspects and Impacts Worksheets. The risk assessment is based on the FEMEA (Failure Mode and Effect Analysis) tool, including procedures for productive or support areas that include the main risks and their respective controls.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has an external communication plan, compliance controls and a monitoring program in place to prevent and detect Spills and Leakages.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has developed and implemented procedures for the investigation of Spills and the internal and external communication related to environmental incidents.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has developed and implemented procedures for the investigation of Spills and the internal and external communication related to environmental incidents. There were no significant Spills that required external communication and reporting.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy. The Solid Waste Management Program includes reduction targets for waste to landfill. The Entity is certified in accordance with ISO 14001.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity has publicly disclosed the amount of waste generated from its operations and the respective methods of disposal in the Alcoa Sustainability Report, pages 144-149: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf The Entity is certified in accordance with ISO 14001.</p>

CRITERION	RATING	COMMENT
6.6a Bauxite Residue (storage construction)	Conformance	The Entity has storage areas for Bauxite waste that are constructed with compacted soil embankments, internal waterproofing and a drainage system. The areas are designed, built and maintained to guarantee the protection of the environment in an effective way, following the best engineering practices and applicable national and international standards.
6.6b Bauxite Residue (integrity checks and controls)	Conformance	The Entity has conducted monitoring of the Bauxite Residue dams regarding their integrity and state of operation in accordance with the Dam Monitoring Plan, which includes visual inspections, instruments, topography and geotechnical surveys. The dams are audited annually by a third party. The Entity is certified in accordance with ISO 14001:2015.
6.6c Bauxite Residue (water discharge)	Conformance	The Entity does not discharge water from the Bauxite Residue dams areas into the environment. All available water in the waste areas (surface supernatant and bottom drain) is pumped back to the Refinery in a closed circuit.
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	The Entity does not discharge water from the Bauxite Residue dams areas into the environment. All available water in the waste areas (surface supernatant and bottom drain) is pumped back to the Refinery in a closed circuit.
6.6e Bauxite Residue (state of the art technologies)	Conformance	The Entity is in the final execution phase of a press filtration project for the disposal of dry waste, with its operation expected in 2022. With this technology, the Entity will cease the use of the waste disposal method in dams.
6.6f Bauxite Residue (remediation)	Conformance	During the environmental studies phase, undertaken to obtain mandatory licences, all environmental aspects including the dam rehabilitation projects and methodologies are approved by the environmental agency.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	Dross is generated in the remelting process by skimming furnaces, scraping furnaces and scraping crucibles. The Entity implements operating procedures to ensure all material originating from skimming or scraping is placed in basins and undergoes a pressing process, where the maximum amount of Aluminium is recovered from the residue, returning to the remelting process. Following pressing, the sludge is sent to an external company for the recovery and treatment of the residue.
6.8b Dross (recycling)	Conformance	Dross is generated in the remelting process by skimming furnaces, scraping furnaces and scraping crucibles. The Entity implements operating procedures to ensure all material originating from skimming or scraping is placed in basins and undergoes a pressing process, where the maximum amount of Aluminium is recovered from the residue, returning to the remelting process. Following pressing, the sludge is sent to an external company for the recovery and treatment of the residue. The efficiency of this sludge recovery is monitored internally to ensure maximum efficiency and action plans are implemented as necessary.
6.8c Dross (review of alternatives)	Conformance	Dross is generated in the remelting process by skimming furnaces, scraping furnaces and scraping crucibles. Periodically, the Entity carries out studies for alternatives for the treatment of Dross waste.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped its water abstraction by source and type, confirming that consumption is adequate with the authorisation from the Environmental Agency.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed the risks related to water in the Watersheds in its Area of Influence in the Water Management Plan Report.
7.2a Water management (management plans)	Not Applicable	The Entity has assessed the risks related to water in the Watersheds in its Area of Influence in the Water Management Plan Report. Material water-related risks were not identified at the Entity.

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Conformance	The Entity has assessed the risks related to water in the Watersheds in its Area of Influence in the Water Management Plan Report. Material water-related risks were not identified at the Entity. However, water consumption by units and source is recorded in the environmental data management system (GEMS system).
7.3 Disclosure of water usage and risks	Conformance	The Entity has assessed the risks related to water in the Watersheds in its Area of Influence in the Water Management Plan Report. Material water-related risks were not identified at the Entity. The Entity has recorded water consumption by units and source (groundwater, surface water or municipal utility) in the environmental data management system (GEMS system). For more information refer to the Sustainability Report, pages 150-155: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has developed a Biodiversity Management Plan that includes the evaluation of risks and the materiality of the impacts on Biodiversity related to the activities and land use in its Area of Influence. The Entity has implemented a Biodiversity Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy The Entity presents its performance and actions on Biodiversity in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has developed a Biodiversity Action Plan that includes targets and timelines to address the material impacts identified in the Biodiversity assessment and monitor its effectiveness. This Plan is consultative and prepared in accordance with the Biodiversity Mitigation Hierarchy. The Entity has implemented a Biodiversity Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy The Entity presents its performance and actions on Biodiversity in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has developed a Biodiversity Action Plan that includes targets and timelines to address the material impacts identified in the Biodiversity

CRITERION	RATING	COMMENT
		<p>assessment and monitor its effectiveness. This Plan is consultative and prepared in accordance with the Biodiversity Mitigation Hierarchy.</p> <p>The Entity has implemented a Biodiversity Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy</p> <p>The Entity presents its performance and actions on Biodiversity in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
8.2c Biodiversity management (reporting)	Conformance	<p>The Entity has developed and publicly communicated the Biodiversity outcomes in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
8.3 Alien Species	Conformance	<p>The Entity has an inventory of invasive plant and animal species. The Biodiversity Management Plan includes specific technical assessments on the introduction of alien and invasive species.</p>
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Conformance	<p>The Entity does not operate in World Heritage Sites (historic and cultural). The Entity has published information on its commitment to World Heritage Sites (historic and cultural) in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	<p>This Criterion is not applicable as the Entity does not operate in World Heritage Sites (historic and cultural). The Entity has published information on its commitment to World Heritage Sites (historic and cultural) in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
8.5a Mine rehabilitation (best available techniques)	Conformance	<p>The Entity has prepared the Degraded Areas Recovery Plan and Mine Closure Plan that describes the procedures for mine closure, rehabilitation, monitoring and associated processes, using the best available technologies. The actions on the closure and Rehabilitation of areas are outlined in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
8.5b Mine rehabilitation (financial provisions)	Conformance	<p>The Entity has documented its forecast costs and the financial provisions for the closure and Rehabilitation</p>

CRITERION	RATING	COMMENT
		<p>of mining areas. For further information refer to the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity has a Human Rights Policy published and a Policy dedicated to the rights of Indigenous Peoples available to Stakeholders: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/indigenous-peoples-policy/Indigenous-Peoples-Policy-English.pdf</p> <p>The Sustainability Report describes the Entity's actions on Due Diligence regarding Human Rights: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has defined a Human Rights Due Diligence process, demonstrating the identification, prevention and mitigation of actual and potential impacts on Human Rights. The Human Rights Policy is published and available to Stakeholders: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>The Sustainability Report describes the Entity's actions on Due Diligence regarding Human Rights: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity has defined a Due Diligence process for Human Rights, demonstrating the identification, prevention, and mitigation of actual and potential impact on Human Rights and has defined the procedure for communication and consultation on remediation actions and controls. The Human Rights Policy is published and available to Stakeholders: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>The Sustainability Report describes the Entity's actions on Due Diligence regarding Human Rights: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
9.2 Women's Rights	Conformance	<p>The Entity has implemented policies on Human Rights and Equal Employment Opportunity:</p>

CRITERION	RATING	COMMENT
		<p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/equal-employment-opportunity/equal-employment-opportunity-policy-en.pdf</p> <p>The Sustainability Report details the Entity's actions on diversity, inclusion, and gender equity:</p> <p>https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
9.3 Indigenous Peoples	Conformance	<p>The Entity has implemented policies and processes to ensure respect for the rights and interests of Indigenous Peoples, in accordance with international standards, including ILO Convention 169 and the UN Declaration on the Rights of Indigenous Peoples. The Entity's Human Rights Policy is available to Stakeholders:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>The Entity's Indigenous Peoples Policy is available to Stakeholders:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/indigenous-peoples-policy/Indigenous-Peoples-Policy-English.pdf</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>The Entity has implemented policies and processes to ensure respect for the rights and interests of Indigenous Peoples in accordance with international standards, including the International Labour Organisation (ILO) Convention C169 and the UN Declaration on the Rights of Indigenous Peoples. The Entity's Human Rights Policy is available to Stakeholders:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>The Entity's Indigenous Peoples Policy is available to Stakeholders:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/indigenous-peoples-policy/Indigenous-Peoples-Policy-English.pdf</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has implemented procedures for the identification of sacred and/or cultural heritage sites and values within the Entity's Area of Influence. According to its operating licence, the Entity implements the technical requirement for the</p>

CRITERION	RATING	COMMENT
		communication and mandatory preservation of identified archaeological sites in its Area of Influence.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has not relocated Communities in the last 55 years and does not plan any relocation in the future. If relocation is necessary, the appropriate measures will be defined and communicated to the local authorities.
9.6b Resettlements (where unavoidable)	Conformance	The Entity has not relocated Communities in the last 55 years and does not plan any relocation in the future. If relocation is necessary, the measures are defined in the Operation License.
9.7a Local Communities (rights and interests)	Conformance	The Entity has defined documented policies and procedures to identify and assess the legal and customary rights of Local Communities. The Human Rights Due Diligence process identified impacts on the lands and livelihoods of Stakeholders.
9.7b Local Communities (impacts)	Conformance	The Entity has conducted a risk assessment to include the impacts of Resettlement and/or displacement on Local Communities. Action plans and controls have been developed and implemented to prevent and mitigate adverse impacts on the livelihoods of Local Communities. The Sustainability Report describes the Entity's action taken: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
9.7c Local Communities (livelihoods)	Conformance	The Entity has engaged with Local Communities regarding the development of actions and plans to prevent and/or mitigate adverse impacts on their livelihoods.
9.8 Conflict-Affected and High-Risk Areas	Conformance	In accordance with its Human Rights Policy, the Entity does not contribute to armed conflicts and is located in an area that may be characterised as 'Social Welfare' (as defined by the International Alert report 'Human rights due diligence in conflict-affected settings, 2018'). The Entity has standards for its supply chain clearly defining rules and expectations for suppliers, Contractors, and others with whom they do business. The Entity implements a supplier evaluation and qualification process.
9.9 Security practice	Conformance	The Entity has a private security process that respects the national laws of Federal Policy and Human Rights in line with recognised standards.

CRITERION	RATING	COMMENT
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has a Human Rights Policy which describes the commitment to respecting Workers' freedom to join Labour Unions and Associations: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy The Entity's Sustainability Report describes the scope of the Union's action: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects Workers' rights to Collective Bargaining and their participation in any collective bargaining process and has a Human Right Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy . The Entity's Sustainability Report describes the scope of the Union's action: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as local legislation does not restrict the right to Freedom of Association and Collective Bargaining, thus not requiring alternative means of Association for Workers
10.2a Child Labour (minimum age)	Conformance	The Entity does not use or support the use of Child Labour and only employs Workers over the legal minimum age and in accordance with its Code of Conduct: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct The Entity only employs Workers over 18 years, as described in the Human Rights Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy
10.2b Child Labour (hazardous)	Conformance	The Entity does not use or support the use of Child Labour and only employs Workers over 18 years.
10.2c Child Labour (worst forms)	Conformance	The Entity does not use or support the use of Child Labour and only employs Workers over 18 years.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not use or support the use of Forced Labour, slave labour or Human Trafficking and complies with the Alcoa Human Rights Policy and Code of Conduct: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy

CRITERION	RATING	COMMENT
		https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, Recruitment Fee or equipment advance from Workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to lodge deposits or security payments at any time. The Entity complies with the requirements for hiring Workers as defined in its Code of Conduct and Human Rights Policy. https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy
10.3d Forced Labour (debt bondage)	Conformance	The Entity complies with its Human Rights Policy and Code of Conduct and does not support Forced Labour including holding Workers in Debt Bondage or forcing them to work to pay off debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity complies with its Human Rights Policy and Code of Conduct and does not support Forced Labour and does not unreasonably restrict the freedom of movement of Workers in the workplace or in on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not keep the original documents of employees, according to interviews and verification records of Workers. Where the Entity uses agencies for recruitment, the agencies are limited to the screening candidates, following which the Entity continues the process internally.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not engage in or support the use of Forced Labour, including denying Workers the freedom to terminate their employment.
10.4 Non-Discrimination	Conformance	The Entity ensures gender equality and does not allow Discrimination. For further information refer to the website: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or harassment.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	The Entity ensures open communication with Workers and on the working conditions and there is no threat of retaliation, intimidation, harassment, and no deduction of wages used as disciplinary practices. The Entity implements the Code of Conduct: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct The Entity has a Human Rights Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy
10.7a Remuneration (living wage)	Conformance	The Entity has a Remuneration Policy that ensures Workers receive adequate remuneration paid as a monthly salary.
10.7b Remuneration (method of payment)	Conformance	The Entity pays salaries monthly as defined by local legislation.
10.8 Working Time	Conformance	The Entity complies with local legislation regarding Working Time, including Overtime, holidays and paid annual leave.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has defined and communicated the Occupational Health and Safety Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-EN.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has defined and communicated the Occupational Health and Safety Policy https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-EN.pdf The Policy is available to visitors and internal service providers.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has defined and communicated the Occupational Health and Safety Policy which includes a commitment to comply with Applicable Law.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has defined and communicated its Occupational Health and Safety (OH&S) Policy. The OH&S Policies and procedures include the right of Workers to understand hazards and safe practices and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has defined and communicated the Occupational Health and Safety (OH&S) Policy and

CRITERION	RATING	COMMENT
		has appropriate procedures to sustain its OH&S Management System.
11.3 Employee engagement on health and safety	Conformance	The Entity has various engagement initiatives for its safety programs, such as the 'Autonomous Groups', an internal commission for the prevention of mining accidents.
11.4 OH&S performance	Conformance	The Entity has tools for the evaluation and continuous improvement of its Occupational Health and Safety performance.

Document Control and Version History

Revision	Date	Notes
0	8 August 2022	Initial Certification Audit - Full Certification