

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 2023

DATE OF EXPIRY

30 JANUARY 2026

CERTIFIED SINCE

31 JANUARY 2020

AUTHORISED BY

A white, handwritten signature on a dark 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

The ASI CoC Scope for Alcoa Corporation includes 20 facilities globally in 13 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 Aluminium Smelting, Casthouse and administrative associated facilities; 10 - Alcoa - Aluminerie de Deschambault S.E.C., including Aluminium Smelting, Casthouse and administrative associated facilities; 11 - San Ciprian Refinery - including refining processes and administrative facilities; 12 - Poços de Caldas - Mines - Refinery - Casthouse and Powder Facilities – Brazil; and 13 - Massena smelter in USA.

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 includes 20 facilities globally, in 13 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;
- 10 - Alcoa - Aluminerie de Deschambault S.E.C., including Aluminum Smelting, Casthouse and administrative associated facilities;
- 11 - San Ciprian Refinery - including refining processes and administrative facilities;
- 12 - Poços de Caldas - Mines - Refinery - Casthouse and Powder Facilities – Brazil; and
- 13 - Massena smelter in USA.

SUPPLY CHAIN
ACTIVITIES

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

ASI STANDARD

- Chain of Custody Standard V1

AUDIT TYPE

- 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)
- Scope Change Audit (19 May – 1 June 2022)
- Re-Certification Audit (28 November – 1 December 2022)

AUDIT FIRM

DNV Business Assurance Services Ltd.

AUDIT DATE

- 5 November – 13 December 2019 (Initial Certification Audit)
- 3 – 23 September 2020 (Scope Change Audit)
- 8 – 10 June 2021 (Surveillance and Scope Change Audit)
- 19 May – 1 June 2022 (Scope Change Audit)
- 28 November – 1 December 2022 (Re-Certification Audit)

AUDIT REPORT
SUBMISSION

- 11 January 2020 (Initial Certification Audit)
- 31 October 2020 (Scope Change Audit)
- 9 July 2021 (Surveillance and Scope Change Audit)
- 1 September 2022 (Scope Change Audit)
- 12 January 2022 (Re-Certification Audit)

AUDIT SCOPE

Initial Certification Audit (5 November – 13 December 2019)

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) and Europe (San Ciprián in Spain and Mosjøen in Norway).

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.

Scope Change Audit (3 – 23 September 2020)

The Audit Scope covered the following Facilities:

- Smelters/Casthouses in Norway (Lista) and Iceland (Fjarðaál).

Supply chain activities included in the Audit Scope:

- Aluminium smelting
- Aluminium Re-melting/Refining
- Casthouses

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

Surveillance and Scope Change Audit (8 – 10 June 2021)

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.

Scope Change Audit (19 May – 1 June 2022)

The Audit Scope covered the following Facilities:

- Alcoa San Ciprián Refinery including refining processes and administrative facilities in Spain;
- Poços de Caldas - Mines - Refinery - Casthouse and Powder Facilities; and
- Alcoa Massena smelter in USA.

Supply chain activities included in the Audit Scope:

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

- Post-Casthouse

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

Re-Certification Audit (28 November – 1 December 2022)

The Audit Scope covered the following Facilities:

- Bauxite Mines in Brazil (AWA Juruti and Pocos de Caldas) and Western Australia (Huntly and Willowdale);
- Refineries Operations in Brazil (ALUMAR and Pocos de Caldas), Western Australia (Pinjarra, Kwinana and Wagerup) and Europe (San Ciprian in Spain)
- Smelters/Casthouses in Canada (Baie-Comeau, Bécancour and Deschambault), Europe (San Ciprián) in Spain, Mosjøen and Lista in Norway, Fjarðaál in Iceland), USA (Massena) and in Brazil (Pocos de Caldas)
- Post-Casthouse production: Powder facility in Brazil (Pocos de Caldas)

The ASI multi-site sampling approach was undertaken at Alcoa Corporate in Madrid where the ASI CoC Implementation Team is based for the Facilities listed within the Audit Scope.

Supply chain activities included in the Audit Scope:

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

All relevant criteria in the ASI Chain of Custody 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.

CERTIFICATION
PERIOD

31 January 2023 – 30 January 2026

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

30 July 2024

CERTIFICATION
NUMBER

72

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	<p>The Entity has been an ASI Member since October 2015 under the Production and Transformation membership class: https://aluminium-stewardship.org/about-asi/asi-members/alcoa-inc/ Alcoa Corporation has operational control over all the Entities included in the scope of the ASI Chain of Custody Standard. More information is available at: https://www.alcoa.com/global/en/who-we-are/locations/default.asp and the 2021 Annual Report, pages 2, 5 and 6: https://investors.alcoa.com/sec-filings/sec-filings-details/default.aspx?FilingId=15600623</p>
1.2 Management system	Conformance	<p>The Entity has a Management System that addresses all applicable requirements of the ASI Chain of Custody (CoC) Standard. The Management System 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. The Entity 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 subject to Due Diligence.</p>
1.3 Management system reviews	Conformance	<p>The Entity 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 within the ASI Certification cycle (every three years).</p>
1.4 Management representative	Conformance	<p>The Entity has nominated a Senior Management Representative as having overall responsibility for the ASI Chain of Custody (CoC) Standard. The Entity has established an ASI Global Implementation Team and supporting personnel in relevant local Business functions.</p>
1.5 Training	Conformance	<p>The Entity has 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. CoC operational team received adequate training.</p>

CRITERION	RATING	COMMENT
1.6 Record keeping	Conformance	The Entity maintains up-to-date records covering all applicable requirements of the Chain of Custody (CoC) Standard. There is no reset of the operational system and records are kept for at least five years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity annually 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 have been reviewed.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity 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 latest annual report and underlying mass balance calculations have been reviewed and verified.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity did not carry over a Positive Balance in the reporting period from the previous year and does not wish to carry over any Positive Balance into the next reporting period.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity did not have an Internal Overdraw from the previous year and did not have any Internal Overdraw in the 2021 Material Accounting Period.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity reported Eligible Scrap that originated from Mosjøen and Lista Metal Flows, comprising of recovered Aluminium quantities from Dross and Dross residues and Pre-Consumer Scrap subject to Due Diligence.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is not applicable as the Entity does not engage in the ASI Credit system.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	This Criterion is not applicable as the Entity does not engage in the ASI Credit system.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.2a Control of CoC Material	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.

CRITERION	RATING	COMMENT
2.2c Risk assessment	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.3 Output Quantity	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.4 Verification and record-keeping	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.5 Error management	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's 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), Poços de Caldas (Brazil), Huntly and Willowdale Mines (Australia) are under the operational control of Alcoa. More information is available at: https://www.alcoa.com/global/en/who-we-are/locations/default.asp</p> <p>ASI Bauxite is sourced only from these Facilities via Alcoa's Intercompany Mass Balance System. More information on Alcoa's legal structure for Mining Activities is available in the 2021 Annual Report, page 2: https://investors.alcoa.com/sec-filings/sec-filings-details/default.aspx?FilingId=15600623</p>
3.1b ASI Performance Standard – Bauxite Mining	Conformance	Alcoa's Juruti, Poços de Caldas, 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 Luis), Kwinana, Pinjarra, Wagerup, and San Ciprian, Poços de Caldas are included in Alcoa's CoC Certification Scope. Alcoa World Alumina and Chemicals (AWAC) is an unincorporated global joint venture between Alcoa Corporation and Alumina Limited. AWAC owns all refineries and mining operations included within Alcoa's Chain of Custody system which is a company owned by Alcoa Inc (60%) and Alumina Ltd (40%), except for Poços de Caldas refinery which is 100% owned by Alcoa Inc.</p> <p>The ownership model is reflected in the Entity's Mass Balance System. More information is available in the 2021 Annual Report, page 2: https://investors.alcoa.com/sec-filings/sec-filings-details/default.aspx?FilingId=15600623</p>

CRITERION	RATING	COMMENT
		The Entity's Material Accounting System ensures that these are the only Facilities where ASI Alumina is produced.
3.2b ASI Performance Standard – Alumina Refining	Conformance	<p>The following refineries are included in the Entity's ASI Performance Standard Certification Scope:</p> <ul style="list-style-type: none"> - Alumar Refinery is ASI Performance Standard Certified (ASI Certificate Number 30) - Alcoa's Western Australia refinery operations (at Kwinana, Pinjarra, and Wagerup) are all ASI Performance Standard Certified (ASI Certificate Number: 68) - Alcoa San Ciprian Refinery is ASI Performance Standard Certified (ASI Certificate Number 93) - Alcoa Poços de Caldas Refinery (ASI Certificate Number 215)
3.3a CoC Certification Scope – Aluminium Smelting	Conformance	<p>The Entity 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:</p> <ul style="list-style-type: none"> - San Ciprian Smelter (Spain) - Baie Comeau Smelter (Canada) - Mosjoen Smelter (Norway) - Fjarðaal (Iceland) - Lista (Norway) - Aluminerie de Bécancour inc., ABI (Canada) - Deschambault (Canada) - Massena, US <p>The Facilities are under Alcoa's operational control: https://www.alcoa.com/global/en/who-we-are/locations/default.asp</p>
3.3b ASI Performance Standard – Aluminium Smelting	Conformance	<p>The Aluminium Smelting Facilities which include Alcoa San Ciprián, Baie-Comeau, Mosjøen, Lista and Fjarðaál, Alcoa's Aluminerie de Bécancour (ABI) and Deschambault, Alcoa Massena Facilities are in Alcoa's ASI Performance Standard Certification Scope. Please see Alcoa's ASI Member page: https://aluminium-stewardship.org/about-asi/asi-members/alcoa-inc</p>
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Conformance	<p>Re-Melting and Refining Facilities included in the Entity's ASI Chain of Custody Certification Scope are under the Entity's operational control: https://www.alcoa.com/global/en/who-we-are/locations/default.asp</p> <p>From the Casthouses included in the ASI Performance Standard scope, only San Ciprián, Poços de Caldas, Lista and Mosjøen are enabled to receive and remelt external scrap; and they are included in the CoC Certification Scope.</p>

CRITERION	RATING	COMMENT
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	Alcoa San Ciprián, Alcoa Poços de Caldas, Alcoa Mosjøen and Alcoa Lista Facilities are engaged in producing Recycled Aluminium within Alcoa's CoC scope. All these Facilities are Certified against the ASI Performance Standard: <ul style="list-style-type: none"> - San Ciprián (ASI Certificate Number 39) - Mosjøen (ASI Certificate Number 71) - Lista (ASI Certificate Number 103) - Poços de Caldas (ASI Certificate Number 215)
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity has established procedures and processes to verify the Pre-Consumer Scrap and Dross 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. Alcoa Lista sends its Dross to a plant next door for recovery. Sows from Dross are listed on the Metal Flow sheet, are designated as ASI Non-CoC Inputs, and are subject to Due Diligence. Alcoa Massena sources ASI CoC Cold Metal Inputs from another ASI CoC Certified Entity. These quantities are designated as Non-Eligible Input Materials in the Entity's Mass Balance System to take a conservative view.
4.2b Post-Consumer Scrap	Not Applicable	This Criterion is not applicable as the Entity does not receive any Post-Consumer Scrap for Remelting.
4.3a Supplier records	Conformance	The Entity has implemented processes to obtain and verify information about Recyclable Scrap Suppliers. There is a supplier registration process for Scrap suppliers including a Due Diligence process. For more information on the Entity's Supply Chain Programme, please see Alcoa 2021 Sustainability Report, pages 101-109: https://www.alcoa.com/sustainability/en/flipbook/index.html
4.3b Cash payments	Not Applicable	This Criterion is not applicable as the Entity does not allow cash payments to suppliers as per the Entity's Standard Operating Procedures.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope – Casthouses	Conformance	The Casthouses San Ciprián, Baie-Comeau, Mosjøen, Lista, Fjardaal, ABI, Deschambault, Massena and Pocos de Caldas 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 following sites listed are under the Entity's operational control: https://www.alcoa.com/global/en/who-we-are/locations More information on Alcoa's Smelting and Casting

CRITERION	RATING	COMMENT
		Operations is available in the 2021 Annual Report, page 6: https://investors.alcoa.com/sec-filings/sec-filings-details/default.aspx?FilingId=15600623
5.1b ASI Performance Standard – Casthouses	Conformance	<p>The following Casthouses are ASI Performance Standard Certified:</p> <ul style="list-style-type: none"> - San Ciprián (ASI Certificate Number 39) - Baie-Comeau (ASI Certificate Number 45) - Mosjøen Smelters (ASI Certificate Number 71) - Fjarðaál (ASI Certificate Number 100) - Lista (ASI Certificate Number 103) - Aluminerie de Bécancour (ASI Certificate Number 147) - Aluminerie de Deschambault (ASI Certificate Number 148) - Massena (ASI Certificate Number 186) - Poços de Caldas (ASI Certificate Number 215) <p>The Certificates are available at: https://aluminium-stewardship.org/about-asi/asi-members/alcoa-inc?lang=id</p>
5.2 Casthouse Products	Conformance	The Entity has established processes to enable the traceability of Casthouse Products which are physically printed on the Materials, supported by its Enterprise Resource Planning (ERP) System (Oracle EBS), and 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	<p>The Entity has established a Responsible Sourcing Policy, addressing Anti-Corruption and bribery. Alcoa's Supplier Standards are available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards</p> <p>The Entity's Supplier Standards are applied to Suppliers with the Entity's expectations on commitments to sustainability. The Alcoa Corporation Anti-Corruption Policy is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption</p> <p>Alcoa's Terms and Conditions reference Alcoa's Supplier Standards:</p>

CRITERION	RATING	COMMENT
		https://www.alcoa.com/global/en/contact/supplier/default.asp
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	<p>The Entity has established global Supplier Standards to enhance responsible sourcing requirements. Refer to sections 'Act with Integrity' on page 3 and "Operate with Excellence' on page 4 in Alcoa's Supplier Standards:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards</p> <p>Alcoa's Terms and Conditions reference Alcoa's Supplier Standards:</p> <p>https://www.alcoa.com/global/en/contact/supplier/default.asp</p> <p>In 2021, the Entity assessed more than 11,600 suppliers (95 percent of the global supply base). Of these, 94 were identified as higher risk requiring further due diligence by undertaking the EcoVadis Ratings Assessment Audit. More than 800 suppliers completed further assessment (39 percent of supply spend), with less than 45% being a first-time assessment. Please see Alcoa's 2021 Sustainability Report for further detail on Alcoa's Supply chain sustainability programme, pages 101-108:</p> <p>https://www.alcoa.com/sustainability/en</p>
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	<p>The Entity has established global Supplier Standards which address issues related to Human Rights Due Diligence. Refer to sections 'Act with Integrity' on page 3 and 'Operate with Excellence' on page 4 in Alcoa's Supplier Standards:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards</p> <p>Alcoa's Terms and Conditions reference Alcoa's Supplier Standards:</p> <p>https://www.alcoa.com/global/en/contact/supplier/default.asp</p> <p>Alcoa's Human Rights Policy:</p> <p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</p> <p>Alcoa's 2021 Sustainability Report on Supply Chain Human Rights, page 108:</p> <p>https://www.alcoa.com/sustainability/en/flipbook/index.html</p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>The Entity has established a 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. The Entity has established processes to mitigate risks because of Business activities with intermediaries.</p>

CRITERION	RATING	COMMENT
7.2 Risk assessment	Conformance	The Entity has established different levels of Due Diligence, subject to country risks, spending, type of Material, suppliers, and other risk amplifiers. These risk assessment methods include automatic Due Diligence checks, EcoVadis assessments and ongoing monitoring via EcoVadis 360° Watch. The outcomes from these measures are regularly reported to Senior Management. For more information, see Alcoa's 2021 Sustainability Report on Alcoa's supply chain risk assessment, pages 100-108: https://www.alcoa.com/sustainability/en/flipbook/index.html
7.3 Complaints mechanism	Conformance	The Entity operates an Integrity Line available at: www.AlcoaEthicsandCompliance.com The Complaints Mechanism and internal compliance processes were reviewed. The Entity's governance approach to managing complaints was robust.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has established an intercompany Mass Balance System with defined Input Quantity and Output Quantity of CoC Material and Non-CoC Material by mass. The Chain of Custody internal control system records and describes 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.
8.2a Post-Consumer Scrap	Not Applicable	This Criterion is not applicable as the Entity's in-scope Casthouses that manage Scrap do not include Post-Consumer Scrap in their metal flows.
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity has developed a Material Accounting System to govern and report on the Input Quantity of Pre-Consumer Scrap. Only Alcoa San Ciprian, Lista, Poços de Caldas and Mosjoen Facilities can process Pre-Consumer Scrap. All scrap Inputs are recorded in the system via Purchase Order (PO) receipt. Scrap lots are differentiated by type and supplier. All the scrap Inputs are recorded in the Entity's ERP system under a PO receipt. The information system allows tracking the entries by item, supplier, and PO reference.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	No Eligible scrap has been identified on the Entity's Material Accounting System for in-scope Entities.
8.3 Material Accounting Period	Conformance	The Entity has designated a 12-month calendar year 1 (January – 31 December) as the Material Accounting Period.

CRITERION	RATING	COMMENT
8.4 Input Percentage	Conformance	The Entity calculates and records the Input Percentage for a given Material Accounting Period. The Entity uses consistent units (tonnes) and adequate Material Conversion rates in its calculations. The process is defined in the Entity's ASI Chain of Custody Standard Manual.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The Entity's Global ASI Supply Chain Calculation Excel® file describes the maximum certified Outputs per product and location, according to the mass balances. The Entity prepares forecasted volumes over the Material Accounting Period and undertakes a monthly reconciliation process with updated actual production volumes. Currently, the Entity is not including Pre-Consumer Scrap Inputs as an eligible factor to account for in the Mass Balance System.
8.6 Output Quantity determination	Conformance	The Entity has undertaken a global reconciliation exercise quarterly 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 2021 and January - September 2022 which was the scope of the Re-Certification Audit. The Re-Certification Audit took place in November 2022.
8.7 Output Quantity designation	Conformance	The Entity has established control points to ensure that the Output Quantity of CoC Material shall be designated as 100% CoC Material. This maximum volume is determined by the Global Supply Chain mass balance, the conversion factor, and the percentage of CoC Material Inputs vs the total production at the 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 has been cross-checked with ASI CoC Documents to verify the process.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	The Entity's ASI Chain of Custody Standard Manual defined how to account for the Eligible Scrap as per ASI requirements. The Material Accounting System defines the Output Quantities of Eligible Scrap. The Entity has designated internal Scrap as Eligible Scrap produced at in-scope Entities on its Material Accounting System.
8.9 Outputs not exceed inputs	Conformance	The Entity has established quarterly reviews and internal controls to ensure the Criterion is met. Alcoa's ASI Chain of Custody global flow determines the

CRITERION	RATING	COMMENT
		<p>maximum Outputs of ASI CoC Material, based on CoC Material Inputs, conversion factors and Eligible Scrap. Relevant personnel are trained to conduct the reconciliation tasks and the Entity ensures senior management oversight of the data, including internal verification of the data.</p>
8.10a Internal Overdraws (not exceed 20%)	Conformance	<p>The Entity conducts quarterly reviews and internal control mechanisms to 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 (January - December 2021 and January - September 2022).</p>
8.10b Internal Overdraws (not exceed affected amount)	Conformance	<p>The Entity'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 (January - September 2021 and January - September 2022).</p>
8.10c Internal Overdraws (period to make up)	Conformance	<p>The Entity's Material Accounting System, quarterly reviews and internal control mechanisms ensure that an Internal Overdraw will be made up within the subsequent Material Accounting Period.</p> <p>The Entity's ASI Global Implementation Team reviews the Mass Balance System quarterly, reconciling the Input and Output Quantities of CoC and Non-CoC Materials. The reviews have Senior management oversight to validate the data. There were no internal overdraws during the Material Accounting Period reviewed (January - September 2021 and January - September 2022).</p>
8.11a Positive Balance (carry over)	Conformance	<p>The ASI Global Implementation Team reviews the Mass Balance System quarterly, reconciling the Input and Output Quantities of CoC and Non-CoC Materials. The reviews have senior management oversight to validate the data. The Entity does not carry a Positive Balance to the consecutive Material Accounting Period.</p>
8.11b Positive Balance (expiry)	Conformance	<p>The ASI Global Implementation Team reviews the Mass Balance System quarterly, reconciling the Input and Output Quantities of CoC and Non-CoC Materials. The reviews have senior management oversight to validate the data. The Entity did not carry a Positive Balance over to the consecutive Material Accounting Period.</p>

9 ISSUING COC DOCUMENTS

9.1 Shipments and transfers	Conformance	The Entity 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. The Entity includes CoC information in the accompanying CoC Document to other CoC Certified Entities.
9.2a Date of issue	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The Entity has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including the Date of issue.
9.2b Reference number	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The Entity has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including the reference number. The Reference number can be linked to the ERP system and consequently the monthly ASI transaction reports which are then consolidated into the Monthly Reconciliation sheet.
9.2c Issuing Entity	Conformance	Alcoa ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. Alcoa has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including information on the issuing Entity.
9.2d Receiving customer	Conformance	The Entity 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	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The Entity 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	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The Entity has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including a Conformance statement.
9.2g Type of CoC Material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The Entity has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including the CoC Material type.
9.2h Mass of CoC Material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The Entity 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	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The Entity has integrated CoC information in the accompanying CoC Document (such as a Certificate of Analysis or Certified Inspection Report), including the mass of total Material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable, as the Entity does not intend to publish Sustainability Data on CoC Documents.
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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	This Criterion is not applicable, as the Entity does not intend to disclose Supplementary Information on CoC Documents.
9.5 Response to verification requests	Conformance	Both the Entity's Customer service and the commercial teams are responsible for overseeing the CoC requests from customers, aligned to the Entity's Quality System Management System. Relevant personnel are trained on their duties under the ASI Chain of Custody Standard. The system is robust to document verification requests, errors, Corrective Actions, and any potential preventive measures.

9.6 Error management	Conformance	The error management process is integrated into the Entity's Quality Management System. Non-conformities, root causes and Corrective Actions were identified and regularly monitored by the Entity's customer care team.
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10 RECEIVING COC DOCUMENTS

10.1 Verify required information included	Conformance	The Entity has a Management System Procedure and establishes controls to regularly check and verify CoC Documents received from other Certified Entities, including intercompany transactions.
10.2 Verify consistency with shipments	Conformance	The Entity has 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	The Entity has established a Management System Procedure to regularly check the ASI website to verify the validity and scope of suppliers' ASI Certification. The Mass Balance System mainly includes intercompany Certified Material and some limited Input from third party Certified Entities.
10.4 Error management	Conformance	The Entity has developed an Error Management Procedure which is integrated into its current complaints mechanism and Error Management System on Oracle. The Customer Issues Tracking Centre for Aluminium processes enables the tracking of errors and subsequent Corrective Actions, which can be linked to the Material Accounting System.

11 MARKET CREDITS SYSTEM: ASI CREDITS

11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.1c No double counting	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.2a Date of issue	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.2b Reference number	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.

11.2d Receiving Entity	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.2g Quantity	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.3c Expiry	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.3d No re-trading	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not intend to use the Market Credit System.

12 CLAIMS AND COMMUNICATIONS

12.1a ASI Claims Guide	Conformance	The Entity has integrated the ASI Claims Guide requirements into its internal Procedures. An approval matrix has been defined to ensure all claims are aligned with the ASI Claims Guide and approved by senior management.
12.1b Verifiable evidence	Conformance	The Entity has demonstrated awareness of the ASI Claims Guide and has implemented robust processes and controls to ensure that all ASI-related claims are supported by verifiable evidence (e.g., use of the ASI logo, press releases and 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	Initial Certification Audit - 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.
3	30 September 2022	Scope Change Audit to incorporate the Facilities Alcoa Massena, Alcoa Poços de Caldas, and the Alcoa San Criprián Refinery
4	20 January 2023	Re-Certification Audit