
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOA WESTERN AUSTRALIA OPERATIONS

CERTIFICATE
NUMBER

68

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

17 JANUARY 2023

DATE OF EXPIRY

16 JANUARY 2026

CERTIFIED SINCE

17 JANUARY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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CERTIFICATION SCOPE

Western Australia Mining and Refining facilities:
Huntly Mine, Willowdale Mine, Kwinana Refinery,
Pinjarra Refinery, Wagerup Refinery, Port areas of
Kwinana and Bunbury, and administrative facilities
under the Entity's operational control.

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at*

www.aluminium-stewardship.org

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa
ENTITY NAME	Alcoa Western Australia Operations
CERTIFICATION SCOPE	Western Australia Mining and Refining facilities: Huntly Mine, Willowdale Mine, Kwinana Refinery, Pinjarra Refinery, Wagerup Refinery, Port areas of Kwinana and Bunbury, and administrative facilities under the Entity's operational control.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Bauxite Mining• Alumina Refining
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (18 – 29 November 2019)• Re-Certification Audit (7 – 11 November 2022)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 18 – 29 November 2019 (Initial Certification Audit)• 7 – 11 November 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 13 December 2019 (Initial Certification Audit)• 14 March 2023 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (18 – 29 November 2019)</u> Western Australia Mining and Refining facilities: Huntly Mine, Willowdale Mine, Kwinana Refinery, Pinjarra Refinery and Wagerup Refinery.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Bauxite Mining• Alumina Refining <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification Audit (7– 11 November 2022)</u> Western Australia Mining and Refining facilities: Huntly Mine, Willowdale Mine, Kwinana Refinery, Pinjarra Refinery and Wagerup Refinery.</p>

Supply chain activities included in the audit scope:

- Bauxite Mining
- Alumina Refining

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.

CERTIFICATION
PERIOD

17 January 2023 – 16 January 2026

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

16 January 2026

CERTIFICATE
NUMBER

68

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented the appropriate systems required to maintain awareness, ensure compliance with Applicable Laws, and maintain a context-sensitive commitment to customary and/or traditional practices.
1.2 Anti-Corruption	Conformance	The Entity has shown a commitment to working against Corruption in all its forms, including Extortion and Bribery. Furthermore, it has ensured that anti-corruption is tackled in ways consistent with applicable laws and prevailing/relevant international standards. Employees, Suppliers, and Contractors are required to follow all Alcoa global policies and procedures, and receive regular online training on the Anti-Corruption and Bribery policy.
1.3 Code of Conduct	Conformance	The Entity has a comprehensive approach to maintaining its own integrity and that of its respective stakeholders. Its Code of Conduct provides a standardised framework to guide business and operational practices.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity is taking a comprehensive approach to environmental, social, and governance practices and is committed to implementing and maintaining Policies that align with the ASI Performance Standard.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has established and implemented a formal process to review their Policies on a regular basis. The Environment, Health and Safety (EHS) Policies are endorsed by the Plant Managers. Checks and balances are ensured through regular conducting of both corporate and internal audits (ASAT).
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates its EHS Policies to employees, contractors, and other stakeholders through various means such as training, document control systems, and by displaying copies in prominent locations. The Policy is also available upon request to interested parties and is communicated through mandatory training with assessments among employees and contractors.
2.2 Leadership	Conformance	Involving senior management in the process, the Entity demonstrates its commitment to responsible

CRITERION	RATING	COMMENT
		and sustainable practices, and ensures that the Policies and procedures are effectively implemented and reviewed over time. The ASI system is integrated into existing processes and allocated sufficient resources, including the internal auditing process.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has established and maintains a comprehensive Environmental Management System which is certified with the ISO 14001 standard and its related requirements.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and maintains a Social Performance Management Standard and System which includes four standards (Social Performance Management Standard, Cultural Heritage Standard, Indigenous Peoples Standard, Human Rights Policy) and detailed guidelines.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing policy through the Global Supplier Sustainability Program, which covers all environmental, social and governance issues works in alignment with various other policies such as the Human Rights Management Framework, Social Management Framework, and Conflict Minerals Procedure. Under the program, Alcoa suppliers and contractors adhere to the Supplier Standards. Alcoa's approach to ESG Due Diligence and improvement in its supply chain is in accordance with the OECD Guidelines.
2.5 Impact Assessments	Conformance	The Entity has shown a commitment to conducting relevant Impact Assessments to establish an understanding of respective baseline conditions, prospective impacts due to their activities and associated mitigation efforts required. Moreover, the Entity has shown evidence that these impact assessments are periodically reviewed and updated.
2.6 Emergency Response Plan	Conformance	The Entity has established and implemented Emergency Response Plans across all sites. However, the regular testing of process through emergency drills was disrupted by COVID-19 and is in the process of being re-established.
2.7 Mergers and Acquisitions	Conformance	The Entity reviews environmental, social and governance issues in the corporate Due Diligence process for mergers and acquisition.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established provisions to review environmental, social and governance issues related to the closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Alcoa Corporate Group periodically publishes annual reports, proxy statements, and sustainability reports that are publicly accessible online: www.alcoa.com The Alcoa 2021 Sustainability Report is available at: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information annually on any significant fines, court decisions, penalties, and non-financial consequences for any non-compliances resulting from its operation.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has a sound framework which ensures all relevant customs fees and legal payments are made to the government. Payments to all government agencies and officials are covered by corporate policies and monitored by an external solutions provider.
3.3b Payments to governments (disclosure – bauxite mining)	Conformance	The Entity publicly discloses payments to governments, building on existing audit and assurance systems. Payments to all government agencies and officials are covered by corporate policies and monitored by an external solutions provider. Alcoa is a signatory to the Extractive Industries Transparency Initiative (EITI) and supports enhancing transparency in mineral revenues.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity is cognisant of their responsibilities in maintaining an open and inclusive communication channel with both internal and external stakeholders. The Entity has maintained an accessible, transparent, understandable, and culturally (as well as gender) sensitive Complaints Resolution Mechanism. Community complaints and grievances are recorded and managed through Alcoa's Community Consultation System. When necessary, information on community complaints and grievances is reported through the site lead team or other publicly accessible channels. The Entity also has regular meetings across departments to address environmental, health and safety related grievances and issues, with the aim of finding solutions.

CRITERION	RATING	COMMENT
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has established procedures to evaluate life cycle impacts of its major product lines for which Aluminium is considered or used. The Entity has a certified Environmental Product Declaration (EPD) for its low-carbon product Ecolum, which was produced based on a Life Cycle Analysis (LCA) that covers the entire process from raw material supply to manufacturing.</p> <p>Guided by the LCA studies conducted by IAI, the Entity has contracted an independent consultant to conduct their own LCA for Bauxite and Alumina. EPDs have also been developed for individual alumina products produced at the Western Australian operations, including smelter grade alumina, non-metallurgical alumina and alumina trihydrate.</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has established channels to provide adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium (containing) product(s) upon customer request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity's EPD is publicly accessible via a website link and all LCAs are available to interested customers and stakeholders upon request.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
4.3a Aluminium Process Scrap (targets)	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
4.3b Aluminium Process Scrap (alloy separation)	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
4.4a Collection and recycling of products at end-of-life (strategy)	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
4.4b Collection and recycling of products at end-of-life (engagement)	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has taken the appropriate steps to ensure that organisational Greenhouse Gas (GHG) emissions are effectively accounted, reported, and disclosed on an annual basis. The National Greenhouse and Energy Reporting (NGER) scheme is the Australian Government's reporting scheme for monitoring greenhouse gas emissions and energy

CRITERION	RATING	COMMENT
		<p>consumption. Emissions and energy data are reported to this regulator via the Emissions and Energy Reporting System (EERS) and some of these data are made publicly available on the NGERs website. The Entity has a legal obligation to disclose its annual GHG emissions via this platform: https://www.cleanenergyregulator.gov.au/NGER/National%20greenhouse%20and%20energy%20reporting%20data/Corporate%20emissions%20and%20energy%20data/corporate-emissions-and-energy-data-2021-22</p> <p>At the corporate level, Alcoa publishes annual sustainability reports addressing these disclosures.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity publishes time-bound GHG emissions reduction targets and has implemented Environmental Improvement Plans (EIP's) to achieve the targets and reduce energy consumption, reduced process emissions and reduce GHG emissions intensities. The targets address the material sources of Direct and Indirect GHG Emissions. https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf</p>
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	<p>The Entity has established multiple procedures to quantify and report Emissions to Air that have adverse effects on humans or the environment and has implemented initiatives to minimise these adverse impacts. Each site, mine or refinery, submits a comprehensive Air Emission Inventory annually through the National Pollutant Inventory (NPI) initiative of the Australian government. The Entity works to improve its air emission management and reduce emissions through the development and implementation of improvement plans. These plans, or EIPs, are developed in collaboration with Stakeholders and are reviewed regularly through community consultation groups.</p>
6.2 Discharges to Water	Conformance	The Entity has established multiple procedures to quantify and report Discharges to Water that have

CRITERION	RATING	COMMENT
		<p>adverse effects on humans or the environment and has implemented initiatives to minimise these adverse impacts. The operational sites maintain a Water Management Plan and Water Balance that outlines water discharges and associated risks and mitigation measures, and the sites also update and maintain a water account in accordance with the Mineral Council of Australia (MCA) Water Accounting Framework and the International Council on Mining and Metals (ICMM) Water Reporting Good Practice Guide. The Entity also reports water monitoring to the regulator via an Annual Environmental Report.</p>
<p>6.3a Assessment and Management of Spills and Leakage (assessment)</p>	<p>Conformance</p>	<p>The Entity appropriately assesses, mitigates, and manages its potential Spills and Leakages. The Entity understands its major risk areas and has ensured that all external communications plans, stakeholder guidelines, compliance controls and monitoring programs work in tandem to detect and mitigate spills and/or leakages.</p>
<p>6.3b Assessment and Management of Spills and Leakage (management)</p>	<p>Conformance</p>	<p>The Entity appropriately assesses, mitigates, and manages its potential Spills and Leakages. The Entity understands its major risk areas and has ensured that all external communications plans, stakeholder guidelines, compliance controls and monitoring programs work in tandem to detect and mitigate spills and/or leakages.</p> <p>The Entity is subject to inspections by regulators to ensure compliance with laws regarding the storage, management, and reporting of leaks and spills. Internal audits are conducted to check compliance with hazardous material management requirements.</p>
<p>6.4a Reporting of Spills (immediate disclosure)</p>	<p>Conformance</p>	<p>The Entity has taken appropriate measures to ensure that any spills are immediately and effectively reported and that an effective incident response plan is ready to be mobilised. Periodic incident reporting as mandated by regulators is used to communicate and publicly disclose spills and the remediation actions taken.</p>
<p>6.4b Reporting of Spills (regular reporting)</p>	<p>Conformance</p>	<p>The Entity has taken appropriate measures to ensure that any spills are immediately and effectively reported and that an effective incident response plan is ready to be mobilised. Periodic incident reporting as mandated by regulators is used to communicate and publicly disclose spills and the remediation actions taken. Events that are defined as major spills and/or key stakeholder issues are included in the corporate Sustainability Report.</p>

CRITERION	RATING	COMMENT
6.5a Waste management and reporting (strategy)	Conformance	The Entity has considered how best to implement a waste management strategy that integrates principles from the Waste Mitigation Hierarchy. This is reflected in the Entity's Waste Management Manual. Furthermore, as a part of this standard, the Entity has taken the appropriate steps to quantify the amount of both Hazardous and Non-Hazardous Waste generated across operations and publicly disclosed the information in the Sustainability Report.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has considered how best to implement a waste management strategy that integrates principles from the Waste Mitigation Hierarchy. This is reflected in the Entity's Waste Management Manual. Furthermore, the Entity has taken the appropriate steps to quantify the amount of both hazardous and non-hazardous waste generated across operations and publicly disclose the information through their Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf
6.6a Bauxite Residue (storage construction)	Conformance	The Entity has established suitable storage facilities for adequate containment of Bauxite Residue and ensuring the preservation of the surrounding environment.
6.6b Bauxite Residue (integrity checks and controls)	Conformance	The Entity has a comprehensive approach to managing Bauxite Residue storage, with mandated standards that cover all aspects of the process from construction to closure and includes daily operator inspections. The Entity deploys geotechnical and engineering specialist contractors to periodically inspect the residue storage facilities.
6.6c Bauxite Residue (water discharge)	Conformance	The Entity has established suitable storage facilities for adequate containment of Bauxite Residue and ensuring the preservation of the surrounding environment. Spillways have been installed to ensure the controlled release of water in the event of an extreme weather event. They have not been activated to date.
6.6d Bauxite Residue (marine and aquatic environments)	Conformance	The Entity's refineries do not discharge Bauxite Residue to marine or aquatic environments.
6.6e Bauxite Residue (state of the art technologies)	Conformance	The Entity has a long-term approach to Bauxite Residue management and has implemented state-of-the-art filtration processing at their Kwinana and Pinjarra refineries.

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6.6f Bauxite Residue (remediation)	Conformance	The Entity's closure plan is included in each of the refinery's Long-Term Residue Management Strategy.
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.
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)	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Water withdrawal and use by source and type is known and each site has a water balance. Withdrawals are listed by type.
7.1b Water assessment (risk assessment)	Conformance	Water-related risk assessments have been developed. As a result of the water scarcity risk assessment completed in 2019, all of the Entity's sites are considered as water scarce. Each site has a water balance. Withdrawals are listed by type. The water scarcity risks are publicly disclosed in the Sustainability Report.
7.2a Water management (management plans)	Conformance	The Entity has established and implemented water management plans at all sites. Risk-related plans are site specific and are developed with Stakeholder consultation where necessary. Targets based on risk are established.
7.2b Water management (monitoring)	Conformance	Water management plans are in place at all sites. Targets are set and reviewed for effectiveness. SMART targets based on risk have been established.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	Water withdrawal, use and material water-related risks are disclosed in several forums and other public media including the annual Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2021-Sustainability-Report.pdf Also refer to the Alcoa Water Stewardship Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/water-stewardship-policy
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	As part of a general overall biodiversity plan and risk assessment process, a risk assessment is undertaken at each site and within its Area of Influence. The Alcoa global Biodiversity Policy and Biodiversity Strategy are publicly disclosed at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy https://www.alcoa.com/sustainability/en/improving-our-footprint/biodiversity-and-mine-rehabilitation
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity's overall biodiversity management approach requires Biodiversity Action Plans to be developed at the planning stage where the risks are first identified.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Biodiversity action plans are developed at the planning stage and are based on the Biodiversity Mitigation Hierarchy. Stakeholder interviews with local groups and Indigenous leaders confirmed that there had been consultation, including with groups opposed to any native forest removal.
8.2c Biodiversity management (reporting)	Conformance	There are extensive disclosures in the public domain including contributions of learnings from the action plan in published scientific papers. The reports of environmental performance are published and available to the public, see: https://www.alcoa.com/sustainability-report Stakeholder consultation confirmed that the biodiversity action plans had been widely consulted. Some of the Stakeholders were philosophically opposed to forestry and mining. The Entity facilitated access to these Stakeholders openly without trying to influence whom the audit team spoke to.
8.3 Alien Species	Conformance	There are extensive processes and procedures to prevent accidental or deliberate introduction of Alien Species. These were confirmed by the site inspection.

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		One key invasive species is Phytophthora ('dieback'). Pre-land clearing surveys are undertaken to determine areas which have Phytophthora. When stockpiling soil after vegetation clearance from Phytophthora areas, the soil is reserved and only used to rehabilitate the same area so as to prevent the spread to other areas.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Conformance	The Entity is committed to not operating in World Heritage properties (exploration and new mines) as documented in the 2021 Alcoa Sustainability Report, page 116.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable as the Entity's operations are not located or listed in World Heritage properties. Alcoa is committed to not operating in World Heritage areas, as documented in the Alcoa Sustainability Report.
8.5a Mine rehabilitation (best available techniques)	Conformance	The Entity has implemented plans and processes for Mine Rehabilitation. There is an internal standard for mine rehabilitation which represents best practice, and this is constantly monitored. There are several experimental improvement strategies which are being managed internally by the Entity.
8.5b Mine rehabilitation (financial provisions)	Conformance	The Entity has established effective processes related to financial provisions to ensure availability of adequate resources to meet rehabilitation and mine closure requirements. There is a well-resourced team and plan with targets dedicated to Mine Rehabilitation.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has implemented the Alcoa global Human Rights Policy, available at: https://www.alcoa.com/global/en/who-we-are/values/default.asp
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Human Rights Due Diligence process and sites have individual assessments to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. The Human Rights commitment is extended to Supplier's standards.
9.1c Human Rights Due Diligence (remediation)	Conformance	Human Rights impacts, where identified, are subject to a grievance and remediation process that aims to meet the United Nations Guiding Principles on Business and Human Rights.

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9.2 Women's Rights	Conformance	<p>The Entity has appropriate Policies and processes in place to promote gender equality and respect the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW). Worker interviews with female Workers confirmed that Discrimination in the workplace is not an issue. The Entity has been recognized by the 'employer of choice for gender equality' programme by the Workplace Gender Equality Agency.</p>
9.3 Indigenous Peoples	Conformance	<p>The Entity has extensive Policies and processes to ensure respect for the rights and interests of Indigenous Peoples. These are transparent and mostly available online. The Entity realised the dynamics of engagement within the Indigenous groups and will always ask that policy and some documentation be reviewed by appropriate local elders. A local Indigenous person has recently been employed as a liaison officer. Local Indigenous elders confirmed the Entity's recognition that they have a lot to learn but that they are listening.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>Despite a lack of current projects, the principles of Free, Prior, and Informed Consent (FPIC) are in place. The Entity's process met international standards and norms and expectations for FPIC. In the case of a recent example, the Global Industry Standard on Tailings Management: Principle 1 was used. Local Indigenous leaders confirmed that FPIC was in place and related several occasions where they were involved.</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has a specific cultural heritage standard. A locally significant cultural heritage site was inspected and it was confirmed that it was included for a recent project at the Pinjarra Refinery Residue Storage. The cultural heritage standard was confirmed by local Indigenous owners, to be in place, and that local groups had been actively involved in the inspection of sites.</p>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity does not undertake involuntary Resettlements across their Australian Operations. The mining rights are only given for crown land and there is no right of compulsory acquisition. The potential risk of noise and other impacts to surrounding landholders is assessed during the design of major projects. The process includes community consultation to ensure key community</p>

CRITERION	RATING	COMMENT
		stakeholders are aware and involved in projects that may impact them. Where landholders choose to remain residing on property close to operations, the Entity has implemented operational controls to reduce noise impacts.
9.6b Resettlements (where unavoidable)	Not Applicable	The Entity does not undertake involuntary Resettlements, and mining rights are only given for crown land and there is no right of compulsory acquisition. The Entity has land acquisition plans for future mining areas where land is acquired in advance of mining should the current owners wish to sell. A land management plan also exists for land around Wagerup and Pinjarra Refineries.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of local Communities in their lands and livelihoods and their use of natural resources. The Entity is taking appropriate steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities. Stakeholder interviews confirmed community engagement and involvement by the Entity.
9.7b Local Communities (impacts)	Conformance	There have been practical examples of where actions were taken to prevent and address adverse impacts on Local Community livelihoods. This included re-routing a local walk trail: https://www.bibbulmuntrack.org.au/news/latest/alcoa-families-explore-the-track The Entity's Policies support and respect Local Communities and their livelihoods, and there are numerous community support goals including: local employment and special terms for identified groups (e.g., local suppliers, Indigenous suppliers), local business use and tenders prioritise local vendors, local community support, workshops to upskill local businesses for local procurement needs, and working with the Waalitj Foundation to encourage Indigenous employment and business capacity building.
9.7c Local Communities (livelihoods)	Conformance	The Entity provides sound levels of support within the Community with local employment, local suppliers, and local community small business workshops for business capacity building. The Entity's Community engagement was recognised by the community stakeholders interviewed.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Conflict-Affected and High-Risk Areas (CAHRA) risk assessment is undertaken on the supply chain only as the audited locations are in Australia (a non-

CRITERION	RATING	COMMENT
		CAHRA county). The Entity uses third party experts to assess risk from overseas suppliers. The risk assessment indicates all supplying countries as non-CAHRAs.
9.9 Security practice	Conformance	Security personnel from the security agency are provided regular training on security practices including the training on respecting Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Extensive interviews with employees including union members and union representatives confirmed that the Entity respects the rights of Workers to associate freely in Labour Unions.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Interviews with employees including union members and union representatives confirm that the Entity respects the rights of Workers to Collective Bargaining, and participate in any Collective Bargaining process.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as Applicable Law in Australia does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	There are no employees under 15 years on site, in accordance with State legislation. There is an age validation process in place as part of the employee filing process
10.2b Child Labour (hazardous)	Conformance	Apprentices work fully supervised and the WA Work Health and Safety (Mines) Regulations 2022 ensures employees under 18 years do not work in hazardous conditions.
10.2c Child Labour (worst forms)	Conformance	The Entity is not involved in or supporting Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	Inspection of documentation, policies and procedures, worker interviews and 'eligibility to work' checks (for employees that do not hold an Australian Passport) confirmed the Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105.
10.3b Forced Labour (deposits, fees, advances)	Conformance	Inspection of documentation, policies and procedures, and worker interviews confirmed the Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention,

CRITERION	RATING	COMMENT
		and C105. There were no incidents of any requirement for any form of deposit, Recruitment Fee or equipment advance from Workers either directly or via recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	Inspection of documentation, policies and procedures and worker interviews confirmed the Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The Entity does not require Migrant Workers to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	Inspection of documentation, policies and procedures and worker interviews confirmed the Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The evidence and worker interviews showed no incidents of holding of Workers in Debt Bondage nor forcing them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	Inspection of documentation, policies and procedures and worker interviews confirmed the Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The evidence and worker interviews showed no incidents of unreasonable restrictions on 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	Inspection of documentation, policies and procedures and worker interviews confirmed the Entity does not engage in nor support the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. The evidence and worker interviews showed no incidents of the retention of original copies of Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity neither engages in or tolerates the use of Forced Labour as defined in ILO Conventions C29, along with Protocol P29 (2014) to this Convention, and C105. Employees are either at will or covered by the terms of the contract and are free to terminate their contract at any time. The Entity does not deny Workers the

CRITERION	RATING	COMMENT
		freedom to terminate their employment at any time without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	The Entity has implemented various anti-discrimination Policies including the Alcoa global Equal Employment Opportunity Policy. Extensive interviews with Workers, including a percentage of female employees that reflected the percentage of women in the workplace, confirmed that the Entity does not engage in or support Discrimination.
10.5 Communication and engagement	Conformance	The Entity demonstrates open communication and direct engagement with Workers and their representatives and uses numerous mechanisms to facilitate this. Worker interviews confirmed a high level of satisfaction with working conditions and resolution of workplace and compensation issues. Workers also felt confident in raising such issues.
10.6 Disciplinary practices	Conformance	The Entity has several policy instruments that ensure zero tolerance to the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. Worker interviews confirmed that this commitment is in practice in the workplace.
10.7a Remuneration (living wage)	Conformance	The Entity's remuneration meets at least a legal or industry minimum standard. In all cases wages are above the award rates. Pay and conditions were confirmed by worker interviews.
10.7b Remuneration (method of payment)	Conformance	Payment of wages are timely, in legal tender and fully documented. This was confirmed by worker interviews and payment records.
10.8 Working Time	Conformance	Inspection of time sheets and worker interviews confirmed that work hours are not excessive and met Applicable Law and industry standards in relation to 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	The Entity has an Occupational Health and Safety (OH&S) Policy that is publicly available online. The Policy meets local law and international standards. Worker interviews confirmed that the Policy is in action in the workplace.

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	Worker interviews confirmed that the OH&S Policy is in action in the workplace. The Policy has senior management commitment and applies to all Workers and Visitors.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Policies contain a commitment to comply with the Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety including, where relevant, ILO Conventions 155 and 176.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Worker interviews confirmed that the OH&S Policy is in action in the workplace. The Policy includes the authority to refuse or stop work if conditions are not safe.
11.2 OH&S Management System	Conformance	The Entity has an operating OH&S Management System. Worker interviews and site inspections confirmed that the OH&S Management System is in place and OH&S is a major focus in the workplace.
11.3 Employee engagement on health and safety	Conformance	The Entity complies with the legislated requirement for elected health and safety representatives. The Workers' involvement is built into the system such as OH&S Committee meetings and toolbox meetings. Workers are aware that they can stop work if unsafe. There is an issues procedure for Workers to discuss and participate in resolution of health and safety issues.
11.4 OH&S performance	Conformance	The Entity's OH&S performance is monitored constantly and results and trends reported to senior management on a weekly basis. The Entity maintains industry benchmarking figures to assist in evaluating their performance and identify areas for improvement.

Document Control and Version History

Revision	Date	Notes
0	17 January 2020	Issued (Full Certification)
1	17 April 2023	Re-Certification Audit – Full Certification