

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Alcoa San Ciprián Refinery

CERTIFICATE NUMBER

93

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE SERVICES
UK LTD.

DATE OF ISSUE

25 AUGUST 2023

DATE OF EXPIRY

24 AUGUST 2026

CERTIFIED SINCE

25 AUGUST 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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

Alcoa San Ciprián Refinery, Residue
Storage Area and Port operations.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa
ENTITY NAME	Alcoa San Ciprián Refinery
CERTIFICATION SCOPE	Alcoa San Ciprián Refinery, Residue Storage Area and Port operations.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Alumina Refining
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (16 - 18 June 2020 (initial desktop audit); 14 July 2020 (follow up on-site audit))Re-Certification Audit and Scope Change (September 25 - 7 December 2023)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">16 - 18 June 2020 and 14 July 2020 (Initial Certification Audit)24 - 27 October 2023 (Re-Certification and Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">12 August 2020 (Initial Certification Audit)9 January 2024 (Re-Certification and Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (16 - 18 June 2020 and 14 July 2020)</u></p> <p>The Audit Scope included the Alcoa San Ciprián Refinery, Residue Storage Area and Port operations.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Alumina Refining <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the commencement of the audit, access to the site was not possible, due to COVID-19 related travel restrictions. The audit was initially undertaken as a 'desktop' exercise in mid-June 2020, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation. The audit was later completed on-site on 14 July 2020.</p> <p><u>Re-Certification Audit and Scope Change (September 25 - 7 December 2023)</u></p> <p>The Audit Scope included the Alcoa San Ciprián Refinery, Residue Storage Area and Port operations.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Alumina Refining <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

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

25 August 2023 – 24 August 2026

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

24 August 2026

CERTIFICATE NUMBER

93



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

The Alcoa San Ciprián industrial complex, established in 1980 between the Lugo municipalities of Cervo and Xove, comprises of two distinct facilities: the Alumina refinery and the primary Aluminium plant. Alcoa owns 60 percent of the Alumina facility, with the remaining 40 percent owned by an Australian listed company. The complex covers an area of approximately 218 hectares. The San Ciprián facility (the Entity) currently employs 972 people.

The main activity undertaken at the Entity is the treatment of Bauxite to obtain Alumina (Al₂O₃). The Bauxite, the main raw material, is received by sea in large ships and then, using the Bayer process at high pressure and temperature, the Alumina in the Bauxite is extracted. The main raw materials used in the Alumina plant are Bauxite, caustic, lime, sulphuric acid and process additives. The Alumina plant is the only Alumina production plant in Spain. Most of the Entity's production is in the form of Smelting Grade Alumina (SGA) (52 %) which is derived as raw material to the Aluminium plant, and the remaining production is distributed to European Aluminium plants. The production capacity of the Entity is 1,600,000 tonnes per year of Alumina, which is destined for primary Aluminium production at both Alcoa and other producers' facilities, as well as to external customers for non-metallurgical applications, such as the ceramic and chemical industry, including water purification.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a system to ensure Compliance with legislation, with the appointment of a competent legal team in all organisational functions. The Entity has defined Policies and procedures to ensure risk identification and Compliance with applicable legislation. The Entity has evidenced systems to maintain an adequate awareness of Compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	The Entity has defined Policies and procedures to identify and manage risks against Corruption in all its forms, including extortion and Bribery, consistent with Applicable Law and prevailing International Standards. The defined processes are relevant for all employees in the Entity and subcontractors. It was evidenced that the Entity has not received any notification or penalty related to violations of laws in the previous five years relating to Bribery and Corruption or anti-competitive behaviour. The Entity has published its Anti-Corruption Policy at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/anti-corruption/AntiCorruption_Policy_ENGLISH.pdf
1.3a-e Code of Conduct	Conformance	The Entity has defined a Code of Conduct that includes principles relating to environmental, social and governance performance. The Code of Conduct is communicated to all Stakeholders and addresses all key aspects of the business, business activities, conflicts of interest, customer and supplier relations and Human Rights compliance. The Code of Conduct is reviewed when changes are identified that could alter Material environmental, social and governance risks, or when there are any indications of gaps in the compliance process. Revisions of the Code of Conduct have not resulted from changes in risks or gaps in compliance, and that it does not exceed five years in the revision of its Code of Conduct. The Entity has published its Code of Conduct externally at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has defined and maintained various Policies aligned with the principles of the ASI Performance Standard. The development, approval and review of Policies are part of the Entity's management processes, such as ISO 14001, ISO 45001 and ISO 50001. The Policies defined are consistent with the Entity's scope, activities and risks, and are reviewed when any changes occur that could alter the risks, including any Material environmental, social and governance risks or any indication of a gap in the compliance process. The Entity's senior management supports the Environmental, Social and Governance (ESG) Policies through the provision of resources and regular reviews of the Policies at periods not exceeding five years. The Entity has a process for communicating Policies both internally and externally. Policies are communicated to all Entity employees and to Stakeholders, suppliers and subcontractors through appropriate channels. The Entity has published the Environment, Health and Safety (EHS) Policy externally at: https://www.alcoa.com/global/en/who-we-

CRITERION	RATING	COMMENT
		<u>are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-EN.pdf</u>
2.2a-c Leadership	Conformance	The Entity has designated senior Management Representatives that have overall responsibility and authority for ensuring compliance with the ASI Performance Standard and the development and deployment of Policies. These designated Management Representatives also have responsibility for providing the resources necessary to establish, implement, maintain and improve the Management Systems.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has an Environmental Management System and holds a valid ISO 14001:2015 certificate.
2.3b Environmental and Social Management Systems - Social	Conformance	<p>The Entity has implemented an Occupational Health and Safety Management System certified according to ISO 45001:2018. The scope and operations included in the ISO 45001 certificate are aligned with the risks and areas in which the Entity operates.</p> <p>The Entity has also implemented a social responsibility Management System aligned with the requirements of Stakeholders. This system includes a Social Management Action Plan which is in the process of being implemented.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Responsible Sourcing Policy as part of its procurement process, which is reviewed every five years or less. This Policy is also reviewed when there is any change that alters the Material environmental, social and governance risks, as well as when there is any indication of a gap in the compliance process.</p> <p>The Entity integrates environmental, social and governance criteria in its supplier selection process. The Entity has a process in place to identify, assess risks in responsible procurement and establish actions and controls to monitor their effectiveness.</p> <p>The Entity's Supplier Standards are available at: <u>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf</u></p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has conducted Impact Assessments, including assessments on Human Rights, environmental and social impacts. The Entity has implemented a process for Major Changes or New Projects that identifies and assesses risks and impacts in its Area of Influence, including consultation with Stakeholders. This is evidenced in the current project to expand the Red Mud Repository (DBR), with implementation of an Environmental and Social Impact Management Plan to avoid, mitigate and, where appropriate, correct any identified material impacts. The Plan includes progress reviews at least every five years. The Plans and impacts are published on the Alcoa website at:</p> <p><u>https://www.alcoa.com/spain/es/press-releases</u></p> <p>As well as on the local authority website: <u>https://www.xunta.gal</u></p>
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has conducted Impact Assessments, including assessments of Human Rights, environmental and social impacts and gender analysis. There are no Indigenous Peoples in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
		<p>The Entity has implemented a process for Major Changes or New Projects that identifies and assesses risks and impacts in its Area of Influence, including consultation with Stakeholders. This is evidenced in the current project to expand the Red Mud Repository (DBR), by assessing and proposing a management plan for the impact on Human Rights with a gender perspective to prevent, mitigate and prevent the impact on Human Rights. This Plan is in process, ensuring that it does not pose risks to Affected Populations and Organisations, or to legitimate commercial confidentiality requirements. The latest plan has not been reviewed as it is under development, although it is expected to be reviewed within five years. Revisions to previous plans are evident. The plan is published at: https://www.alcoa.com/spain/es/press-releases</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented external and internal Emergency Plans in accordance with applicable regulations and legislation. These Emergency Plans have been developed and coordinated with the authorities, local councils, subcontractors and employees. These plans are reviewed at intervals of less than five years and in the event of any changes that alter the nature or scope of the risks of emergency incidents or indicate a gap in the compliance process.</p> <p>The Entity has implemented several protocols for different emergency scenarios, which are regularly trained. The Entity's updated external Emergency Plans are published on the Authority's website at: https://cpapxxunta.gal/c/document_library/get_file?file_path=/portal-cpapx/DXEmergenciasInterior/PlansEmergencia/PEE_SanCibrao_cas.pdf</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed an action plan to address situations where it may be necessary to suspend or significantly modify operations due to factors beyond its control. The ORM process (Operational Risk Management process / Business Resilience focus) has been implemented to identify business continuity issues, make assessments and develop emergency risk plans.</p> <p>The Entity reviews its plans at intervals of no more than five years and for any changes that alter the nature or extent of environmental, social and governance risks or any indications of gaps in the compliance process.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has implemented a Due Diligence process that includes environmental, social and governance issues in Mergers and Acquisitions (M&A). There has been no merger or acquisition since the Entity joined ASI.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has a defined process for managing closure, decommissioning and/or divestment which defines responsibilities for legal compliance and assessment and consultation with Stakeholders to take into account their interests.</p> <p>The Entity also has an asset management policy/procedure, which addresses the entire life cycle of the facilities, including end-of-life (closure) planning. This procedure includes provisions for awareness and prevention of negative social, environmental and governance impacts and promotion of positive outcomes.</p>

CRITERION	RATING	COMMENT
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity prepares an annual Sustainability Report in accordance with GRI (Global Reporting Initiative) Guidelines in which it communicates its governance strategy for environmental, social and economic impacts. Throughout its Sustainability Report, the Entity provides a reference of its contribution to the UN Sustainable Development Goals. The Entity makes its Sustainability Report available at: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p> <p>The Entity regularly publishes its financial results in an Annual Report and Proxy Statement, which it makes publicly available at: https://investors.alcoa.com/financial-reports/annual-reports-and-proxy-statements</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has implemented a process to identify and report legal non-compliance and liabilities, internally and externally. The Entity did not receive significant fines, judgments, monetary sanctions or non-monetary sanctions for non-compliance with regulations or laws.</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity has demonstrated that it has Policies and processes in place to ensure Compliance with the legal requirements applicable to payments to Governments.</p> <p>The Entity publicly discloses its payments to Governments and the value of payments to beneficiaries of financial or in-kind contributions at: https://investors.alcoa.com/home/default.aspx</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has adequate mechanisms in place to receive complaints, claims and requests from Stakeholders. This mechanism complies with regulations, is accessible to all Stakeholders by internet, email or telephone, managed in both local and international languages, and is transparent and fair. The process for managing complaints and claims is reviewed at intervals of less than five years through internal audits and/or when there is any change that alters the Material environmental, social and governance risks or when there is any indication of a gap in the compliance process.</p> <p>The Entity has an integrity line (+34 900-95-1247) or email (EthicsandCompliance@alcoa.com) and discloses how to access the integrity line and the attention and response process at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/integrity-line/Integrity_Line_Card_Spanish.pdf and https://secure.ethicspoint.com/domain/media/en/gui/29154/index.html</p> <p>There have been no relevant complaints received since the Entity joined ASI.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has implemented a process to perform a Life Cycle Assessment (LCA). The scope of the LCA study is 'cradle to gate' and includes the sourcing and extraction of raw materials, transport of raw materials to produce Alumina for primary Aluminium production. The</p>

CRITERION	RATING	COMMENT
		LCA has been conducted in accordance with ISO 21930 and identifies environmental impacts and indicators.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity informs its customers about the LCA upon request. The Entity publicly discloses information about its LCA and the assumptions on which it is based, including the system boundaries at: https://www.alcoa.com/products/sustana and in the Entity's Sustainability Report, pages 9-11: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has published its energy consumption and GHG emissions of each source in its annual Sustainability Report, pages 77 to 89: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf The Entity, in accordance with Applicable Law, annually reports both Direct and Indirect GHG emissions data to the authorities. It is published on the website of the environmental authority at: https://ptr-es.es/informes/fichacomplejo.aspx?Id_Complejo=1808 Published energy input and GHG emissions data for each source are verified by a qualified and independent body. The Entity holds valid ISO 14001:2015 and ISO 50001:2011 certificates.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	Alcoa Corporate has defined a strategy to reduce its carbon footprint and aims to achieve zero net GHG emissions across its global operations by 2050 for both Direct (Scope 1) and Indirect (Scope 2)

CRITERION	RATING	COMMENT
		<p>emissions. It sets out to reduce GHG emissions intensity from refining and smelting (Scope 1 and 2) by 30% by 2025 and 50% by 2030 against a 2015 baseline. This strategy is in line with achieving a global warming scenario below 2°C by 2050.</p> <p>At the local level, the Entity has developed an emissions reduction strategy by deploying the Entity’s Corporate strategy with local targets and action plans. The actions including a reduction of Scope 1 emissions from gas consumption through a change of the heat exchanger and Scope 2 emissions from electricity consumption by optimising the steam in the digestion process. Emissions calculations in Entity’s strategy are in accordance with the International Aluminium Institute (IAI) Aluminium Sector Greenhouse Gas Protocol and the World Resource Institute (WRI) protocol, using the 100-year global warming potentials provided by the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC).</p> <p>The Entity’s strategy, target achievement and GHG emission reduction plan are all reviewed annually and published in the Sustainability Report, pages 77 to 89: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p> <p>The Entity is also required to report to the Authority on an annual basis in the Statement of Non-Financial Information (SNFI) report.</p> <p>However, the Entity in meeting the Alcoa Corporate strategy, has not yet committed to a GHG Emissions Reduction Pathway consistent with a 1.5oC warming scenario.</p>
5.4 GHG Emissions Management	Conformance	The Entity has implemented and certified both an ISO 14001 Environmental Management System and an ISO 50001 Energy Management System. These systems have procedures in place for the control and monitoring of GHG emissions and reduction targets and plans.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity has implemented a process to identify and control emissions into the atmosphere, as well as to establish and follow plans to reduce its emissions. The Entity verifies air emissions through an independent accredited body, following the plan of its Integrated Environmental Authorisation (AAI). Air emissions are verified at least every three years.</p> <p>The Entity reports annually to the authorities the results of its air emissions, including its action plans, as well as any anomalies identified, including actions to control them. The Entity discloses its data, targets and plans to reduce its atmospheric emissions in its Sustainability Report, page 109:: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p>
6.2a-g Discharges to Water	Conformance	The Entity has implemented a process for the control of Discharges to Water and has defined the risk points and takes measures for their control and improvement. The Entity has an environmental authorisation (AAI) for discharging to water and complies with the applicable rules and regulations required by the environmental authorities. The Entity undertakes controls by an accredited and independent external body. The risks and discharge data are verified

CRITERION	RATING	COMMENT
		<p>annually and when there is any episode of discharges that exceed the thresholds established internally or externally, or when there is any change that alters the risks.</p> <p>The Entity reports annually to the authorities the results of discharges, including its action plans, as well as any anomalies identified, including actions for their control. The Entity discloses its data on water consumption, discharges and spills, objectives and action plans in its Sustainability Report, pages 102 to 108: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented a procedure for the prevention and control of Spills and Leakages. The Entity has identified all risk points for Spills or Leakages, which are reviewed annually, or after any Spill or Leakage or any indication of a gap in the control process.</p> <p>The Entity has an environmental authorisation that defines the legal requirements regarding Spills and Leakages, including the frequency of controls, parameters to be analysed, control limits and incident reporting. The Entity undertakes inspections in accordance with the regulations by an accredited and independent external company of the points of risk of spills or leaks.</p> <p>The Entity's Spills and Leakage data, as well as its action plans are presented in the Sustainability Report, page 120: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity holds an environmental authorisation that defines how incidents involving Spills and Leakages are to be reported. The Entity reports incidents to the Xunta de Galicia for communication to the Affected Populations and Organisations of the volume and type of Spills and Material Leakages, as well as their possible impact, as soon as possible after the incident occurs.</p> <p>The Entity publicly discloses any Material Spills and Leakage Impact Assessments on an annual basis, their underlying causes and the decontamination actions undertaken in its annual Sustainability Report, page 120: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste Management Strategy that is designed in accordance with the Waste Mitigation Hierarchy. The Strategy addresses all Waste generated within the relevant scope of the Entity's operations. The Entity has implemented procedures to describe the requirements to manage waste to comply with applicable regulations, support the Environment, Health and Safety Management System, as well as further long-term goals.</p> <p>In accordance with the regulations, the Entity has defined a plan to minimise the generation of Hazardous and Non-Hazardous Waste. This plan is also provided to the Authorities. The Entity prepares an annual waste management report that is communicated to the Authorities. Most of the waste generated by the Entity is reused.</p> <p>The Entity communicates the results, objectives and plans in waste management in its Sustainability Report, page 77: https://www.alcoa.com/sustainability/en/pdf/2019-Sustainability-Report.pdf</p>

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6.6a-g Bauxite Residue	Conformance	<p>The Entity has constructed a red sludge pond (DBR) for the storage of Bauxite tailings. The capacity of DBR has been increased in such a way as to avoid leachate into the environment. The Entity publishes information on the technology used and its long-term strategy for Bauxite and tailings management in its Sustainability Report on page 90.</p> <p>A control and monitoring process is in place to ensure the integrity of Bauxite waste storage. Controls are undertaken periodically and performed internally and externally by a competent and specialised third party. The controls include continuous monitoring and planned controls, appropriate to the size and type of the DBR. The Entity performs and complies with the controls required by applicable environmental regulations. The Entity defines more stringent measures and controls than those required by applicable environmental regulations.</p> <p>The Entity controls and neutralises the discharge of water from the storage of Bauxite waste to minimise environmental impacts through an effluent treatment plant. There is discharge of Bauxite waste materials into marine and aquatic environments (this practice is not permitted in Spain). The Entity complies with the water discharge quality regulations defined by the Environmental Authorisation.</p> <p>The Entity has also investigated and evaluated options for the reuse of bauxite waste. The Entity has prepared and updated a master plan that includes activities, risks and opportunities for the DBR in the medium to long term. Sources of state-of-the-art information are provided from other Alcoa sites where the assessed opportunities have been implemented.</p>
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified and mapped its water withdrawals and uses by source and type. It has developed a water balance that illustrates water inflows and outflows, sources and destinations. The Entity continuously monitors water consumption and water discharges.</p> <p>As part of the Entity's ISO 14001:2015 certified Environmental Management System, a soil and groundwater risk assessment has been undertaken, which assessed the water-related risks in the catchment areas of the Entity's Area of Influence. The result of the risk assessment confirmed that the Entity is located in an area that is not subject to water-stress.</p> <p>The Entity also has an environmental authorisation for the collection and treatment of water before its discharge into the ocean.</p> <p>The Entity publicly discloses annually the volume of water abstracted and used by source and type, as its water risks for the hydrographic basins of the Entity's Area of Influence. This process is undertaken through meetings and communications with the water authority (Aguas de Galicia) and through the Sustainability Report, page 102: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p>

CRITERION	RATING	COMMENT
7.2a-e Water Management	Conformance	<p>Water assessments are performed annually or when any change occurs that alters the water-related risks or upon any indication of a gap in the control process.</p> <p>Whilst the Entity is located in an area with no water stress, it is developing a strategy to reduce water use by 2025 and 2030 in conjunction with the Affected Populations and Organisations as part of the Alcoa Corporate strategy. This task has been undertaken with support from the water authority (Aguas de Galicia).</p>

8. BIODIVERSITY AND ECOSYSTEM SERVICES

8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has implemented a process to assess the risk and Materiality of impacts on Biodiversity of land uses and activities in its Area of Influence. The Entity has implemented a biodiversity analysis performed by a Qualified Specialist, which considered the Area of Influence and its boundaries, including the Entity's facilities, associated facilities and cumulative impacts. The biodiversity analysis performed has also defined the HCVA (High Conservation Value Areas) methodology developed by the HCV Resource Network for the identification of key biodiversity areas.</p> <p>The analysis includes the identification of flora and fauna species with presence or potential presence and their level of vulnerability or protection. It also assesses the risks associated with invasive Alien Species. The 2020 risk analysis has determined that there are no risks which are considered critical. The risk analysis is in the process of being updated and will incorporate input from selected Stakeholders, including representatives of potentially Affected Populations and Organisations.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	<p>The Entity has developed a Biodiversity Action Plan with time-bound targets to address identified risks and material impacts on Biodiversity and Ecosystem Services. In the most recent biodiversity risk assessment, no risks were identified as critical.</p> <p>This Biodiversity Action Plan has been prepared by a Qualified Specialist in accordance with the Biodiversity Mitigation Hierarchy. The Plan takes into account the contributions of potentially Affected Populations and Organisations. The Entity monitors the effectiveness of the Plan annually.</p> <p>The Biodiversity Action Plan is currently being updated, and is reviewed when there are any changes at the Entity that alter the risks or when the assessment indicates changes in terms of risk or any indication of gaps in the process.</p> <p>The Entity publicly discloses the latest version of the Biodiversity Action Plan and its targets annually in its Sustainability Report, page 95: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p>
8.2a-g Biodiversity Management	Conformance	<p>The Entity's Biodiversity Action Plan applies the Biodiversity Mitigation Hierarchy in decision making to minimise its impacts, prioritising the adoption of measures to avoid impacts from the outset, such as careful spatial or temporal localisation of the element or disturbance. Some of the biodiversity protection actions are managed through the Alcoa Foundation, within the environmental education function. Details of the actions are published on the Alcoa Foundation website at: https://www.alcoa.com/spain/es/community</p>

CRITERION	RATING	COMMENT
8.3a-c Management of Priority Ecosystem Services	Conformance	The Entity does not rely on Priority Ecosystem Services. No risks to Biodiversity were rated as critical in the risk assessment. The Entity has defined a Biodiversity Action Plan, which applies the mitigation hierarchy in decision making to minimise impacts, prioritising the adoption of measures to avoid impacts from the outset, such as careful spatial or temporal localisation of the element or disturbance. The Entity's Biodiversity Action Plan is in the process of being updated.
8.4 Alien Species	Conformance	<p>The Entity has implemented a process to assess the risk and Materiality of impacts on Biodiversity of land uses and activities in its Area of Influence, including priority habitats and species (threatened and invasive). The Entity's biodiversity analysis includes the identification of flora and fauna species with presence or potential presence and their level of vulnerability or protection. A biodiversity analysis has been undertaken in accordance with regulations, identifying risks and impacts, including those associated with invasive Alien Species.</p> <p>The Entity has defined a Biodiversity Action Plan aligned with the risks and impacts identified in its biodiversity analysis, including those related to Alien Species.</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has a public commitment to not explore, mine or operate in World Heritage sites. The Entity's Biodiversity risk analysis, undertaken by Qualified Specialists, determined that there were no World Heritage Properties in the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	<p>The Entity's Biodiversity risk analysis, undertaken by Qualified Specialists, identified that there are Protected Areas in the Entity's Area of Influence defined by the Entity, however the Entity's Facilities are not located within any Protected Area.</p> <p>An action plan has been defined to comply with all the regulations associated with these Protected Areas. This action plan has been developed with the contributions of Stakeholders, including the Protected Area Management Authorities and Affected Populations and Organisations at risk of being affected. There are no Indigenous populations located in the Entity's Area of Influence.</p>
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity has developed and implemented a Human Rights Policy that is reviewed in periods of less than five years. The Human Rights Policy addresses Child Labour, freedom of contract, equal opportunity, compensation, Freedom of Association and relationships with Communities. It is aligned to the United Nations Guiding Principles on Business and Human Rights. The Human Rights Policy is available at: 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 Code of Conduct (page 34) includes a commitment to respect the protection of Human Rights of all Stakeholders:</p>

CRITERION	RATING	COMMENT
		<p>https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</p> <p>The Entity has implemented a Human Rights Due Diligence process to identify, prevent, mitigate and account for actual and potential impacts on Human Rights, which follows the model established by the Danish Institute for Human Rights. The Human Rights risk assessment confirmed no areas of major concern.</p> <p>The Entity has identified risks and impacts and has established action plans to improve performance, including those responsible for actions and timelines for implementation. The action plans are monitored and updated. The Human Rights Due Diligence process is undertaken in periods of less than five years.</p> <p>However, the expansion of the red sludge pond (DBR) is one of the main concerns of the Community and the assessment of the Human Rights aspect of this project has not yet been completed.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented an Equal Employment Opportunity Policy, which is communicated to all employees and is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/equal-employment-opportunity/equal-employment-opportunity-policy-es.pdf</p> <p>The Entity has a Code of Conduct, which includes the Equal Employment Opportunity Policy and addresses gender equity and women's empowerment. The Entity reinforces and deploys its gender equality strategy through the actions of the Entity's Women's Network. The Entity has defined diversity targets and indicators and results and performance are available in the Sustainability Report, page 71: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is Not Applicable as Indigenous Peoples, or their lands, territories and resources are not present in the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is Not Applicable as Indigenous Peoples, or their lands, territories and resources are not present in the Entity's Area of Influence.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is Not Applicable as Indigenous Peoples, or their lands, territories and resources are not present in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is Not Applicable to the Entity, as there are no cultural or sacred heritage sites or values, nor Indigenous Peoples, or their lands, territories and resources, present in the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is Not Applicable to the Entity, as there are no cultural or sacred heritage sites or values, nor Indigenous Peoples, or their lands, territories and resources, present in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.6a-i Displacement	Not Applicable	This Criterion is Not Applicable as there have been no resettlements for the Entity's activities since it became a member of ASI.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has implemented a Stakeholder Engagement Process to ensure positive relationships with Stakeholders and effective means of resolving community concerns. Respect for Communities is established in Spanish law and is respected by the Entity. The Entity's commitment to meeting the rights and interests of Local Communities was also evidenced in the implementation of the Human Rights Policy and the Code of Conduct.</p> <p>The Entity has demonstrated its ongoing engagement with the Local Community and explores with them any opportunities to respect and support their livelihoods. Numerous social and environmental actions and projects were evidenced, several of them through the Entity's employee volunteering programme, and focused on sustainability and education.</p> <p>The Entity's strategy, objectives, plans and results in relation to Stakeholders and community engagement are published in the Sustainability Report, page 56, and it is also communicated at: https://www.alcoa.com/spain/es/community</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>Procurement and responsible sourcing are managed at the Corporate level, and Alcoa is committed to providing supply chain transparency in accordance with Applicable Laws and regulations, including the U.S. Securities and Exchange Commission's conflict minerals rule implementing the Dodd-Frank Act.</p> <p>At a corporate level, Alcoa has developed and implemented a strategy to respond to identified risks, including implementation of the Supplier Standards that incorporate responsible sourcing principles. An external supplier Due Diligence program has been implemented to better manage risk in the supply chain in relation to the areas of anti-Bribery and Corruption, trade compliance, Child and Forced Labour, criminal background, Human Trafficking and conflict minerals. It was demonstrated, in line with the Human Rights Policy, Code of Conduct and Human Rights Program, that the Entity does not contribute to armed conflict and Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). To date, no non-compliances or alerts have been identified in the Entity's supply chain.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>At a corporate level, Alcoa has implemented a third party supplier Due Diligence program to further manage risk in its supply chain related to the areas of anti-Bribery and Corruption, trade compliance, Child and Forced Labour, criminal history, Human Trafficking and conflict minerals. To date, no high risks have been identified in the Entity's supply chain.</p> <p>In accordance with the Human Rights Policy, Code of Conduct and Human Rights Program, the Entity does not contribute to armed conflict or Human Rights abuses in CAHRAs.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	At a corporate level, Alcoa has implemented a strategy to respond to identified risks, including the implementation of Supplier Standards that incorporate responsible sourcing principles. To date, no high risks have been identified in the Entity's supply chain.

CRITERION	RATING	COMMENT
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	At a corporate level, Alcoa has implemented an external supplier Due Diligence program to better manage risk in its supply chain. Independent third party audits of Alcoa's Due Diligence process is undertaken as part of the ASI audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	At a corporate level, Alcoa has implemented an external supplier Due Diligence program and reports annually on its supply chain Due Diligence in its Sustainability Report, available at: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf
9.9 Security practice	Conformance	The Entity has a contract with a specialised security company that respects Human Rights in accordance with recognised standards and good practices, and has the appropriate infrastructure, experience and accreditation established by the legislation for the fulfilment of security services. The Entity has adequate procedures for Human Rights compliance, including the Alcoa Code of Conduct.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity has a Human Rights Policy aligned with the United Nations Guiding Principles on Business and Human Rights which addresses freedom of engagement and Freedom of Association and which specifically allows employees the right to Freedom of Association. Alcoa is a participant in the United Nations Global Compact, a strategic policy initiative for businesses that are committed to aligning their operations and strategies with universally accepted principles in the areas of Human Rights, labour, environment and anti-corruption.</p> <p>The majority of the employees at the Entity are unionised employees. The Entity has a Collective Bargaining Agreement, which is negotiated and agreed with the Works Council. The Collective Bargaining Agreement is communicated to the Spanish authorities and published at: https://www.deputacionlugo.gal/sites/deputacionlugo.org/files/inline-files/21-02-2022.pdf</p>
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as it operates in a country (Spain) where Freedom of Association and the Right to Collective Bargaining is required under National Law.
10.2a Child Labour	Conformance	<p>The Entity has implemented a Human Rights Policy, which is aligned with the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) Conventions for minimum age and Child Labour. The Entity has a Code of Conduct, which includes specifically not to tolerate Forced, compulsory, or Child Labour, or Discrimination of any kind.</p> <p>In Spain, the regulations establish a minimum age to work of 16 years and the protection of minors. The Entity does not hire minors under 18 years of age. The Entity has implemented a third party supplier Due Diligence program to further manage risk in its supply chain related to the areas of Child and Forced Labour.</p>

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10.3a-c Forced Labour	Conformance	<p>The Entity has implemented a Human Rights Policy, which is aligned with the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) Conventions for minimum age and Child Labour. The Entity has a Code of Conduct, which includes specifically not to tolerate Forced, compulsory, or Child Labour, or Discrimination of any kind.</p> <p>In Spain, the regulations establish a minimum age to work of 16 years and the protection of minors. The Entity does not hire minors under 18 years of age. The Entity has implemented a third party supplier Due Diligence program to further manage risk in its supply chain related to the areas of Child and Forced Labour.</p> <p>In Spain, there is no prohibition of any Labour agreement, hiring conditions, or restrictions of movement for employees in any case. The Entity does not illegally retain the Workers' documents and there is no policy or practice requiring the retention of these documents for any purpose.</p> <p>The Entity's employees have Union representation and are hired in accordance with local requirements. Employees, either of their own free will or under the terms of the contract, are free to terminate their contract of employment at any time.</p> <p>The Entity publishes its Modern Slavery Statement annually in its Sustainability Report, page 38: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>Alcoa is a participant in the United Nations Global Compact, a strategic policy initiative for businesses that are committed to aligning their operations and strategies with universally accepted principles in the areas of Human Rights, Labour, environment and anti-Corruption.</p> <p>The Entity has implemented an Equal Employment Opportunity Policy, which prohibits all types of Discrimination. The Entity participates in Alcoa's engagement practices for, and supports, diversity groups such as AWN (Alcoa Woman Network) and EAGLE (Employees at Alcoa for Gay and Lesbian Equality).</p> <p>At the Entity, the Collective Bargaining Agreement establishes the mechanisms to guarantee non-Discrimination in relation to opportunities for promotion, development and salary.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented a process for dealing with complaints and requests in accordance with the regulations and the Collective Bargaining Agreement. The Entity has established a group of employees to guarantee open communication and direct engagement with Workers regarding working conditions and the resolution of work and compensation problems, without any threat of retaliation, intimidation or harassment.</p> <p>The Entity promotes a good working environment via dialogue coordinated by the Human Resources Department. In addition, a communication channel is available for employees to ask anonymous questions directly to members of the Entity's leadership group.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented the Alcoa Human Rights Policy, which is aligned with the United Nations Guiding Principles on Business and Human Rights. The Human Rights Policy integrates the principle of providing a trustworthy workplace that is safe, respectful and inclusive</p>

CRITERION	RATING	COMMENT
		<p>of all people and free from harassing, intimidating, offensive or disrespectful behaviour.</p> <p>The Entity has a Code of Conduct, which includes the commitment towards respect for the protection of Human Rights for all Stakeholders and providing a workplace free from Harassment and bullying.</p> <p>The Entity has implemented a process to report and investigate allegations of Harassment. The Entity adheres to the Alcoa Corporate Policies regarding labour conduct. The Entity also applies as a reference, the Statute of Labour Conduct of the Metal Sector, as well as compliance with the provisions of the Collective Bargaining Agreement, regarding the procedure for investigating offenses and penalties.</p>
10.7a-c Remuneration	Conformance	<p>The Entity has implemented a process for payroll which has been agreed with Unions and is in accordance with applicable regulations. The Entity's Collective Bargaining Agreement establishes the remuneration of personnel, including social benefits, vacation time and pension plans. Remuneration of management personnel references salary tables, which also include details on social benefits, and pension plans. In both cases, paid work permits are also included. The wages provided by the Entity exceed the minimum wage in Spain as established by law.</p> <p>The Entity adheres to Applicable Law in determining the timing of wage payments and has implemented a process which is reliable and effective. Workers receive documentation of their payroll receipt either through email with an encrypted attachment, or via a secure paper copy. Each payroll receipt includes all information required.</p>
10.8a-c Working Time	Conformance	<p>The Entity has adhered to all Applicable Laws in determining working time and holidays. In the Collective Bargaining Agreement, the Entity has established the number of hours per year to be carried out according to local regulations. The monitoring of compliance with the legal limit of Overtime for each Worker is also undertaken. Workers' representatives are informed of any Overtime hours performed.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity has informed its Workers on their Labour Rights through different channels, which include the dissemination of the Collective Bargaining Agreement and the minutes of the Workers Committees. A communication channel is available for Workers to ask anonymous questions directly to senior management.</p> <p>The Entity has established an ethics and compliance program to communicate basic workplace rules and standards.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented an Occupational Health and Safety (OH&S) Management System based on the ISO 45001:2018 standard. This Management System is certified and is audited annually, both internally and externally. Procedures and processes have been developed to analyse the organizational context, promote employee consultation and participation, operational planning and control, in addition to monitoring and measuring performance through indicators and objectives and promoting continuous improvement. The Entity's OH&S Policy is available at:</p>

CRITERION	RATING	COMMENT
		https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-ES.pdf
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity evaluates the performance of its OH&S Management System monthly through the monitoring of indicators, and performs an annual analysis through a Management System review process undertaken by the Entity's management.</p> <p>The OH&S Management System has identified and evaluated risks, risk control, accident and incident investigation. These risks are updated at least every five years and are reviewed when any change occurs that alters the Material OH&S risks and any indication of a gap in the control process.</p> <p>The Entity annually discloses the effectiveness of the OH&S Management System, using leading and lagging indicators, as well as a comparative performance analysis, in the Sustainability Report, page 45: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf and at: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera--grupo-alcoa-inespal.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has implemented an OH&S Management System, certified to the ISO 45001:2018 standard.</p> <p>The Entity has implemented several Committees and Sub-committees so that Workers can raise, discuss and participate in the resolution of Occupational Health and Safety issues with Area Managers, the leadership team or plant management. All meetings and decisions are recorded in minutes and action plans are determined if necessary. Workers can freely report risks which are then tracked on the Entity's Health and Safety dashboard.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	25 August 2020	Initial Certification Audit – Full Certification
1	13 February 2024	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply V3. Due to constraints associated with resourcing the audit and aligning a suitable audit date between the Entity and Auditing Firm, a three-month extension to the prior Certification Period was granted.