

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Alcoa Corporation

CERTIFICATE NUMBER  
218

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION  
LEVEL  
FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM  
DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE  
15 FEBRUARY 2024

DATE OF EXPIRY  
14 FEBRUARY 2027

CERTIFIED SINCE  
23 AUGUST 2022

## AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd  
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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](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

Corporate programs, policies and  
procedures at Alcoa Corporate  
Head Office in Pittsburgh, USA.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

|                         |  |
|-------------------------|--|
| MEMBER NAME             | Alcoa Corporation  |
| ENTITY NAME             | Alcoa Corporation  |
| CERTIFICATION SCOPE     | Corporate programs, policies and procedures at Alcoa Corporate Head Office in Pittsburgh, USA.   |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li><li>• Semi-Fabrication</li></ul>   |
| ASI STANDARD            | <ul style="list-style-type: none"><li>• Performance Standard V3</li></ul>  |
| AUDIT TYPE              | <ul style="list-style-type: none"><li>• Initial Certification Audit (19 – 22 April 2022)</li><li>• Re-Certification Audit and Scope Change (2 – 11 October 2023)</li></ul>   |
| AUDIT FIRM              | DNV Business Assurance Services UK Ltd.  |
| AUDIT DATE              | <ul style="list-style-type: none"><li>• 19 – 22 April 2022 (Initial Certification Audit)</li><li>• 2 – 11 October 2023 (Re-Certification Audit and Scope Change)</li></ul>   |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none"><li>• 30 June 2022 (Initial Certification Audit)</li><li>• 15 December 2023 (Re-Certification Audit and Scope Change)</li></ul>  |
| AUDIT SCOPE             | <p><u>Initial Certification Audit (19 - 22 April 2022)</u></p> <p>The audit scope included the corporate programs, policies and procedures at Alcoa Corporate Head Office.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li><li>• Semi-Fabrication</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification Audit and Scope Change (2 - 11 October 2023)</u></p> <p>The audit scope included the corporate programs, policies and procedures at Alcoa Corporate Head Office.</p> <p>Supply chain activities included in the audit scope:</p> |

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

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

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AUDIT OUTCOME

- Certification

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AUDIT METHODOLOGY  
DECLARATION

The Auditors confirm that:

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

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CERTIFICATION PERIOD

15 February 2024 – 14 February 2027

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NEXT AUDIT TYPE

Surveillance Audit

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NEXT AUDIT DATE

14 August 2025

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CERTIFICATE NUMBER

218



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.

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## ENTITY OVERVIEW

Alcoa is a global leader in Bauxite Mining, Alumina Refining and Aluminium smelting and casting. With operations on six continents, Alcoa has a workforce of more than 13,000 employees. The involvement of Alcoa dates back to 1886, with the discovery of a commercial process that allowed Aluminium to be produced economically.

The Company is organised in two business segments: Alumina and Aluminium. The Alumina segment includes the global bauxite mines and the alumina refining assets. Alcoa is one of the world's largest Bauxite miners, with active mines in Brazil and Australia. It also operate the world's largest third-party Alumina business, with six refineries on three continents. Alcoa's Aluminium segment includes Aluminium smelting, casting and the majority of its energy assets.

## 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 |
|--------------------|------------|-------------|--------|-----------------|
| <b>SYSTEMS</b>     | High       | High        | Medium | HIGH            |
| <b>RISKS</b>       | High       | High        | Medium | HIGH            |
| <b>PERFORMANCE</b> | High       | High        | Medium | HIGH            |
| <b>OVERALL</b>     |            | <b>HIGH</b> |        |                 |

## FINDINGS

| CRITERION  | RATING      | COMMENT   |
|--|-------------|---|
| <b>1. BUSINESS INTEGRITY</b>                                     |             |   |
| 1.1 Legal Compliance   | Conformance | The Entity has implemented regionally organised teams of lawyers and also enlists the support of outside counsel for specific countries and expertise. It utilises a range of inputs including through local knowledge and community engagement activities to understand Customary Law and has defined procedures and Policy to manage any conflicting requirements.  |
| 1.2 Anti-Corruption  | Conformance | The Entity has defined an Anti-Corruption Policy as part of its suite of Policies and Procedures to ensure implementation. The Entity has identified and categorised the highest risk activities and roles, which includes working with intermediaries. There are additional Due Diligence and monitoring requirements for these circumstances. The Entity supports implementation through training records, a corporate grievance mechanism and location-specific mechanisms that vary by site.  |
| 1.3a-e Code of Conduct   | Conformance | The Entity has published a Code of Conduct, which was last updated in 2022. It is subject to regular review as per the corporate work instruction and this is tracked and changes are made where a trigger is noted. The Code of Conduct is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethicscompliance/code-conduct.asp">https://www.alcoa.com/global/en/who-we-are/ethicscompliance/code-conduct.asp</a>   |
| <b>2. POLICY AND MANAGEMENT</b>                                  |             |   |
| 2.1a-f Environmental, Social, and Governance Policy              | Conformance | The Entity has a broad range of targeted Environmental, Social and Governance (ESG) Policies that reflect the impacts, risks and opportunities facing the business and define its corporate approach. There is a documented overarching process which determines review and governance requirements of policy setting. Core Policies are publicly available and all Policies are posted on the intranet and supported by communication and awareness activities. Awareness of ESG Policies is support by regular training                       |
| 2.2a-c Leadership  | Conformance | The Entity has developed a clear structure of responsibilities for implementation of the Policies as evidenced through structural diagrams in corporate presentations and through testimonials. There are acknowledged challenges in recruiting and retaining the full range of people required to implement these Policies and the ASI Performance Standard requirements from Corporate to local level, however evidence confirmed that the Entity has increased resources over recent years to ensure adequate management of high risk areas. |
| 2.3a Environmental and Social Management Systems - Environmental | Conformance | The Entity implements a systematic approach to environmental management via a third party certified (ISO 14001) Environmental Management System.  |
| 2.3b Environmental and Social Management Systems - Social        | Conformance | The Entity has developed and implemented Social Management Systems to support the implementation of its four key standards and to enhance the tracking and effectiveness of Community and Stakeholder engagement. The Entity is also hiring people on each site to increase social performance capacity at the operating sites.   |

| CRITERION  | RATING                | COMMENT   |
|--|-----------------------|---|
| 2.4a-e Responsible Sourcing                        | Minor Non-Conformance | <p>The Entity has developed a detailed responsible sourcing programme addressing the Supplier Sustainability Program (external engagement) based on an Assess, Audit, Advance and Responsible Sourcing (internal tools and decision making) process. The Entity has demonstrated improvements in Policy requirements and implementation including risk assessment, scope of issues covered, and performance of suppliers. This is informed by a broad range of third party information inputs.</p> <p>However, there was a significant variation in progress between procurement led and non-procurement led suppliers (which contain some of the highest risk areas of Bauxite and Alumina). As the process matures, more of the supply chain will be assessed and brought into the programme, however, there remains potential for smaller suppliers with higher risks to not to be effectively assessed and managed.</p> |
| 2.5a-g Environmental and Social Impact Assessments | Conformance           | <p>The Entity applies its Environmental and Social Impact Assessment (ESIA) standard to any significant changes, supported by a variety of internal procedures and tools. If public consultation is required, it is approved by the relevant country public affairs team and the facilitated by a location engagement advisor. The Entity are in the process of transitioning between the old system and SP360 – which is an enhanced social assessment and performance tracking tool.</p>  |
| 2.6a-h Human Rights Impact Assessment              | Minor Non-Conformance | <p>The Entity has implemented appropriate mechanisms to identify Human Rights impacts such as Human Rights Impact Assessment (HRIA).</p> <p>However, it was noted that there is currently no public disclosure of the Human Rights Impact Assessment for each of the Entity's specific operations.</p> <p>Evidence of direct engagement with Affected Populations has been incorporated into the HRIA specifications, and enhancements to the Social Management System is likely to facilitate this improvement, however this was not evidenced for some recent HRIA's.</p>   |
| 2.7a-f Emergency Response Plan                     | Conformance           | <p>The Entity has Emergency Preparedness and Response Procedures (ERP's) and the relevant Policy meets the requirements. Meetings with Local Communities are held on emergency response and drill exercises are held. Publication of the ERP's is undertaken at a site level.</p>   |
| 2.8a-d Suspended Operations                        | Conformance           | <p>The Entity has demonstrated an effective approach to crisis management including monitoring, escalation process and communications, with a focus on acute, immediate risks.</p> <p>As part of its Enterprise Risk Management (ERM) process, climate impacts are being assessed from various perspectives within the business (e.g., biodiversity). Each operating site is responsible for the management of Business resilience planning for more long-term, strategic issues including water availability, flood risks and other ESG risks.</p>   |
| 2.9a-b Mergers and Acquisitions                    | Conformance           | <p>The Entity has provided evidence to demonstrate an enhanced Due Diligence process, which included additional environmental, social and governance criteria. There have been no recent Mergers or Acquisitions. Providing information and developing plans with affected communities and populations is undertaken through the social engagement team facilitated via the Social Management System.</p>   |

| CRITERION  | RATING      | COMMENT   |
|--|-------------|---|
| 2.10a-b Closure, Decommissioning and Divestment                        | Conformance | The Entity has developed decommissioning provisions for ESG practices for any closures and divestments which include both contractual and financial requirements. Consultation with Local Communities is a requirement and detailed communication plans are developed in the event of a site closure.   |
| <b>3. TRANSPARENCY</b>   |             |   |
| 3.1a-b Sustainability Reporting  | Conformance | The Entity has publicly disclosed its Environmental, Social and Governance (ESG) approach, its Material impacts and the strategies and plans to manage them. The Entity's coverage of Material impacts has adjusted over time. Information is published on both its website and within the Annual Sustainability Report, which is Third Party verified:<br><a href="https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</a>  |
| 3.2 Non-compliance and Liabilities                                     | Conformance | The Entity has publicly disclosed information on significant fines and sanctions through the U.S. Securities and Exchange Commission (SEC) filings and in its Annual Sustainability Report:<br><a href="https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</a>  |
| 3.3a-c Payments to Governments   | Conformance | The Entity has a Policy commitment to not make political donations and it publicly discloses payments to governments, typically at a regional level. It also reports political contributions through its Political Action Committee (PAC), and this information is publicly available via the U.S. Securities and Exchange Commission website.  |
| 3.4a-f Stakeholder Complaints, Grievances and Requests for Information | Conformance | The Entity operates a corporate wide Grievance Mechanism in all languages applicable to its areas of operations. The Mechanism is managed by a Third Party, which enables anonymous complaints to be raised. If access to this mechanism is not available, a complaint can be raised through several other processes and then recorded in the main system. Additionally, all operating sites have their own mechanisms to raise complaints, and are being reviewed so that they are both culturally sensitive and accessible to Affected Populations. Local monitoring of potential issues is a component of the terms of reference of the Entity's Community Committees. |
| <b>4. MATERIAL STEWARDSHIP</b>   |             |   |
| 4.1a Environmental Life Cycle Assessment                               | Conformance | The Entity evaluates its life cycle impacts, and produces a range of Environmental Product Disclosures (EPD's) addressing its main Product and 'eco' specific Product lines produced by its hydroelectric powered smelters to communicate the outcomes of the Life Cycle Assessments (LCA). These are available on the Entity's website and by request and includes information on boundaries and assumptions:<br><a href="http://www.alcoa.com/sustana">http://www.alcoa.com/sustana</a><br><br>The Entity is working to enhance the level of detail provided in the information as well as the range of LCA and EPD's produced.   |
| 4.1b-c Environmental Life Cycle Assessment – Disclosure                | Conformance | The Entity evaluates its life cycle impacts, and produces a range of Environmental Product Disclosures (EPD's) covering its main Product and 'eco' specific Product lines produced by its hydroelectric powered smelters to communicate the outcomes of the LCA's. These are  |

| CRITERION  | RATING                | COMMENT   |
|--|-----------------------|---|
|  |                       | <p>available on the Entity's website and by request and include information on boundaries and assumptions:<br/> <a href="http://www.alcoa.com/sustana">http://www.alcoa.com/sustana</a></p> <p>The Entity is working to enhance the granularity of information and data and the range of LCA and EPD's produced.</p>  |
| 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, as it is addressed at the location-level for each relevant Alcoa ASI Certified operation.   |
| 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   | Conformance           | The Entity's recycling strategy includes a range of activities, including increasing recycled content, engage in the development of innovative technology to increase Post-Consumer recycled streams and the quality of material inputs. The Entity engages with US-based organisations to increase the quality of Aluminium outputs from Materials Recovery Facilities It also liaises with other regional and national engagement relevant at its other locations. The Entity additionally participates in industry initiatives that promote recycling. |
| <b>5. GREENHOUSE GAS EMISSIONS</b>   |                       |   |
| 5.1a-b Disclosure of GHG Emissions and Energy Use  | Conformance           | <p>The Entity has published its Material energy use and GHG emissions by source in its Sustainability Report:<br/> <a href="https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf#page=85">https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf#page=85</a></p> <p>GHG Emissions data are verified by a Third Party.</p>   |
| 5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020                           | Not Applicable        | This Criterion is not applicable to the Entity, as no new smelting capacity has been added post 2020. The Entity has made significant efforts to improve the quality of the emissions inventories across the portfolio.   |
| 5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020                  | Not Applicable        | This Criterion is not applicable to the Entity, as no new smelting capacity has been added post 2020. The Entity has made significant efforts to improve the quality of the emissions inventories across its site portfolio.  |
| 5.3a-e GHG Emissions Reduction Plans   | Minor Non-Conformance | The Entity has both short- and mid-term GHG emissions goals that relate to both Direct and Indirect GHG emissions. Its corporate reduction targets and pathway are below the 2°C decarbonisation scenario as defined in the Paris Climate Accord. High level information is published on the pathway and emissions reduction plan, as well as performance. The Entity is working towards strengthening its targets and alignment to the ASI approved pathway, once it becomes available.  |



| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
|   |                | However, the Entity has not yet committed to a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario.   |
| 5.4 GHG Emissions Management                            | Conformance    | The Entity has established Management Systems and operational controls to monitor the implementation of its 2020 GHG emissions reduction target. In accordance with its decarbonisation strategy, the Entity has published a technology roadmap to deliver on its climate commitments. |
| <b>6. EMISSIONS, EFFLUENTS AND WASTE</b>                |                |  |
| 6.1a-f Emissions to Air                                 | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 6.2a-g Discharges to Water                              | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 6.3a-g Assessment and Management of Spills and Leakages | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 6.4a-b Public Disclosure of Spills and Leakages         | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 6.5a-c Waste Management and Reporting                   | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 6.6a-g Bauxite Residue                                  | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 6.7a-f Spent Pot Lining (SPL)                           | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 6.8a-d Dross  | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| <b>7. WATER STEWARDSHIP</b>                             |                |  |
| 7.1a-b Water Assessment and Disclosure                  | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 7.2a-e Water Management                                 | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
| <b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>                                  |                |   |
| 8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment            | Conformance    | The Entity has updated its Biodiversity Standard which was adopted in 2019, to strengthen the section of the Standard that relate specifically to Ecosystem Services, and was subject to Board approval at the time of Audit.   |
| 8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.   |
| 8.2a-g Biodiversity Management   | Conformance    | The Entity has updated its Biodiversity Management Policy, although the updated Policy was awaiting formal approval at the time of the Audit. Evidence observed during the audit confirm the Policy was being implemented.  |
| 8.3a-c Management of Priority Ecosystem Services                               | Conformance    | The Entity's corporate Biodiversity Management Standard is currently in revision to incorporate new expectations for the management of Ecosystem Services, with final internal approval expected imminently. Training and guidance materials have been developed to support location-level conformance (to ASI Performance Standard Version 3).   |
| 8.4 Alien Species  | Conformance    | The Entity's corporate Biodiversity Management Standard requires that each operating site must assess the risks and control for the accidental introduction of Alien Species as a result of Alcoa's activities. If Alien Species are present and capable of adverse impacts on Biodiversity, measures to prevent spread of these species are to be implemented. The Entity's Biodiversity Management Standard is currently in revision to incorporate Ecosystem Services aspects.   |
| 8.5a-b Commitment to "No Go" in World Heritage Properties                      | Conformance    | The Entity has formulated a public commitment to not explore, mine or operate in World Heritage sites. Alcoa has no exploration, mining or other operational activities occurring within World Heritage Properties.   |
| 8.6a-d Protected Areas   | Conformance    | The Entity operates in areas of high Biodiversity and aims not to operate in Protected Areas. Some operations are in proximity to nature reserves, but are not within them.   |
| 8.6e Protected Areas - Bauxite Mining  | Conformance    | The Entity operates in areas of high Biodiversity and aims not to operate in Protected Areas. Whilst some of the Entity's operations are in proximity to Protected Areas and other nature reserves, they are not located within them.   |
| 8.7a-i Mine Rehabilitation   | Conformance    | The Entity's corporate Mine Rehabilitation Standard applies the overriding principle that all mining shall be considered as transient land use and that areas used for mining will be rehabilitated to an agreed land use. Furthermore, its Biodiversity Policy contains a public commitment to progressive rehabilitation of mines to approved performance criteria, recognising that ecosystem restoration plays a key role in mitigating unavoidable Biodiversity impacts. Mine rehabilitation performance is published annually in its Sustainability Report. The Biodiversity Policy is available at:<br><a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy</a> |

| CRITERION   | RATING                | COMMENT   |
|---|-----------------------|---|
| <b>9. HUMAN RIGHTS</b>  |                       |   |
| 9.1a-d Human Rights Due Diligence   | Minor Non-Conformance | <p>The Entity has incorporated a commitment to support the United Nations Guiding Principles for Business and Human Rights and the International Labour Organization (ILO) Core Conventions in its Human Rights Policy:<br/> <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</a></p> <p>The Human Rights Policy operates across the Entity in conjunction with numerous other Policies, including the Responsible Sourcing Policy. However, there is a potential gap between procurement and non-procurement implementation and the full involvement of Affected Populations. There is also insufficient resources to adequately fulfill all requirements across the full range of suppliers.</p>   |
| 9.2a-e Gender Equity and Women's Empowerment                                  | Conformance           | <p>The Entity's approach to gender equity and women's empowerment is founded in its Inclusion and Diversity Strategy and addresses all aspects of employment as well as within the Entity's supply chain. This Strategy is supported by the Code of Conduct, Harassment and Bullying Free Workplace and Equal Employment Opportunity, Human Rights Policies, and works to protect and support women's empowerment. Where legally allowed, the recruitment process requests relevant information and seeks to ensure diverse representation in the process, including by female-owned enterprises. The Alcoa AWARE employee group supports women in Alcoa. Further information on the effectiveness of programs is available in the Annual Sustainability Report, pages 68 and 71:<br/> <a href="https://www.alcoa.com/sustainability-report">https://www.alcoa.com/sustainability-report</a></p>            |
| 9.3a-i Indigenous Peoples   | Conformance           | <p>The Entity has implemented an Indigenous Peoples Policy that is publicly available, regularly reviewed and supported by internal standards. The social performance management approach includes procedures for community engagement, including with Indigenous and Land Connected Peoples which is typically implemented locally with community and social performance leads, with support provided by the Entity's corporate team. Personnel with specific expertise have been recruited at both a corporate and regional level to develop capability and ensure cultural, linguistic, governance and resource understanding is included in assessments and action plans. Further information is available at:<br/> <a href="https://www.alcoa.com/sustainability/social/indigenous-and-land-connected-people">https://www.alcoa.com/sustainability/social/indigenous-and-land-connected-people</a></p> |
| 9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes | Conformance           | <p>The Entity's Indigenous and Land Connected Peoples Standard outlines key principles of Indigenous and Land Connected Peoples (ILP) agreements, including guidance on the agreement governance, agreement principles, content, agreement making and maintenance, and representation. The Entity continues to build capacity to consult and engage with Indigenous Peoples in order to obtain Free Prior and Informed Consent (FPIC) for Major Changes.</p>  |
| 9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining                | Conformance           | <p>The Entity's Indigenous and Land Connected Peoples Standard outlines key principles of Indigenous and Land Connected Peoples (ILP) agreements, including guidance on the agreement governance, agreement principles, content, the agreement process and maintenance, and representation.</p>   |

| CRITERION  | RATING                | COMMENT  |
|--|-----------------------|--|
| 9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support    | Conformance           | The Entity has established an Indigenous and Land Connected Peoples Standard, which outlines key principles of Indigenous and Land Connected Peoples (ILP) agreements, including guidance on the agreement governance, agreement principles, content, the agreement process and maintenance, and representation.   |
| 9.5a Cultural and Sacred Heritage - Identification                     | Conformance           | The Entity has established an Indigenous People Policy and Cultural Heritage Management Standard. In line with other criteria, it involves Local Communities in the identification of such sites and landscapes and seeks their input and agreement of management approaches. This is enshrined in law in some operational regions. It may use local experts and third parties to help inform this process. It also has implemented Chance Find Procedures which assist in identifying unknown cultural and sacred heritage sites and applies the avoidance principle where possible. Where relevant, operating sites also adhere to locally defined processes as per local law.                             |
| 9.5b Cultural and Sacred Heritage - Impacts                            | Conformance           | The Entity has established an Indigenous People Policy and Cultural Heritage Management Standard. It involves Local Communities in the identification of such sites and landscapes and seeks their input and agreement of management approaches. This is enshrined in law in some operational regions. It may use local experts and third parties to help inform this process. It also has Chance Find Procedures which assist in identifying unknown cultural and sacred heritage sites and applies the avoidance principle. Where relevant, operating sites also adhere to locally defined processes as per local law.   |
| 9.6a-i Displacement  | Conformance           | The Entity has established a Resettlement, Land Acquisition and Influx Requirement Procedure, which is aligned to the IFC (International Finance Corporation) Standard 5 and addresses displacement. It is addressed within the Entity's Social Performance Standard with avoidance as the primary condition. The Entity does not participate in any involuntary displacement but has displaced livelihoods. As such, it has worked with Affected Populations to develop compensation agreements based on a third party loss and damage assessment. It monitors implementation on an ongoing basis including with Local Community committees and continues to support any families classified as vulnerable. |
| 9.7a-h Affected Populations and Organisations                          | Conformance           | The Entity has a reference note within its social performance Management System that relates to any Vulnerable Person and is in addition to those covered by Indigenous and Land Connected Peoples. The Entity implements social improvement plans as well as environmental action plans to mitigate impacts. Plans are published locally.   |
| 9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems | Minor Non-Conformance | <p>Alcoa implements the Trace International TRAC Program and engages with Trace International to support their Due Diligence program and further manage risk in the supply chain, including for conflict minerals. Alcoa has no operations in areas of active conflict.</p> <p>The Entity's Due Diligence practices for Conflict-Affected and High-Risk Areas (CAHRAs) are implemented in accordance with the OECD Guidance. However, the Entity is yet to complete detailed Due Diligence assessments for Joint Venture (JV) operations.</p>  |

| CRITERION   | RATING                | COMMENT  |
|---|-----------------------|--|
| 9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks    | Minor Non-Conformance | The Entity's Due Diligence practices for CAHRAs are implemented in accordance with the OECD Guidance. However, the Entity is yet to complete detailed Due Diligence assessments for Joint Venture (JV) operations.   |
| 9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks | Minor Non-Conformance | The Entity's Due Diligence practices for CAHRAs are implemented in accordance with the OECD Guidance. However, the Entity is yet to complete detailed Due Diligence assessments for Joint Venture (JV) operations.   |
| 9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence       | Conformance           | The Entity's Due Diligence practices were audited as part of this ASI audit.   |
| 9.8e Conflict-Affected and High-Risk Areas - Report annually              | Conformance           | The Entity has reported on its Due Diligence in its Sustainability Report and the Entity's website refers to their commitment to ongoing Due Diligence. The Entity's broader reporting addresses their management, risks and there are details on responses to some high Human Rights risks. |
| 9.9 Security practice   | Not Applicable        | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |

## 10. LABOUR RIGHTS

|  |             |   |
|--|-------------|---|
| 10.1a-c Freedom of Association and Right to Collective Bargaining  | Conformance | The Entity has established a Human Rights Policy that confirms the rights of Workers including forming or joining a Labour Union or other Associations to Collectively Bargain within the bounds of Applicable Law. In practice this is facilitated through Trade Unions and Works Councils. There are currently 31 active labour agreements across the Entity. The Human Rights Policy is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</a>  |
| 10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law | Conformance | The Entity has established a Human Rights Policy that confirms the rights of Workers including forming or joining a Labour Union or other Associations to Collectively Bargain within the bounds of Applicable Law. In practice this is through Trade Unions and Works Councils. There are currently 31 active labour agreements across the Entity. The Human Rights Policy is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</a>  |
| 10.2a Child Labour   | Conformance | The Entity has established a Human Rights Policy that confirms hiring practices conform to the International Labor Organization (ILO) Conventions for minimum age and Child Labour. The Entity confirmed that they do not hire permanent employees under the age of 18. An exception to this includes summer internships in administrative roles and apprentices who may be under 18 years of age, who join in cohorts and follow a pre-defined development program. The Human Rights Policy is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</a> |

| CRITERION                           | RATING                | COMMENT  |
|-------------------------------------|-----------------------|--|
| 10.3a-c Forced Labour               | Conformance           | <p>The Entity has established a Human Rights Policy that prohibits the use of all forms of Forced Labor, including prison labour, indentured labour, bonded labour, military labour, Forced Labour and any form of Human Trafficking. Implementation is overseen by the Operations Manager at the local level.</p> <p>The Entity has published a Modern Slavery Statement, available at: <a href="https://www.alcoa.com/australia/en/pdf/Alcoa-Modern-Slavery-Statement.pdf">https://www.alcoa.com/australia/en/pdf/Alcoa-Modern-Slavery-Statement.pdf</a></p>   |
| 10.4a-c Non-Discrimination          | Conformance           | <p>The Entity has established an Inclusion Strategy and monitors inclusion and diversity. It can evidence progress in the percentage of employees from underrepresented groups. A range of inclusion groups support anti-Discrimination efforts and the Entity's mandatory 'Trusting Workplaces' global training module covers Discrimination and Harassment.</p>  |
| 10.5 Communication and engagement   | Conformance           | <p>The Entity has provided training to employees and has a range of regular meetings and employee touch points, such as 'daily dialogues' at the start of each shift, newsletters and the intranet to encourage employee engagement. It has also established Regional Inclusion Councils that organise events regularly. The Entity's anti-retaliation policy, publicised through its integrity cards, reiterates that 'No one can take action against you for asking a question or raising a concern in good faith'.</p>  |
| 10.6a-g Violence and Harassment     | Conformance           | <p>The Entity has addressed the requirements for Violence and Harassment within the Code of Conduct. All employees are trained on the Code of Conduct. The 'Trusting Workplaces' training, the integrity line, and employee engagement and communications encourages a 'speak up' culture. 'Trigger' words are monitored in employee surveys responses to monitor employee sentiment and take corrective actions where necessary. The Code of Conduct is provided in multiple languages, available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</a></p> |
| 10.7a-c Remuneration                | Minor Non-Conformance | <p>The Entity has defined terms and conditions available in local languages, accessible to all employees and provides documented payroll information. Regional Directors are responsible for ensuring remuneration is above the living wage and meets requirements. This is achieved through benchmarking, salary surveys and living wage assessments. Local legislation, Collective Bargaining agreements and local assessments drive Overtime agreements.</p> <p>However, there is currently no corporate-level oversight to confirm Overtime payments.</p>  |
| 10.8a-c Working Time                | Minor Non-Conformance | <p>The Entity's Working Time practices comply with national law and applicable collective agreements, as set out in its Human Rights Policy. Alcoa follows local legislation, Collective Bargaining agreements and local assessments in relation to Working Time.</p> <p>However, there is currently no corporate-level oversight to confirm Working Time thresholds are met.</p>  |
| 10.9a-b Informing Workers of Rights | Conformance           | <p>The Alcoa Corporate Policies and local terms and conditions are communicated through various means including the intranet and</p>   |

| CRITERION  | RATING         | COMMENT  |
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|  |                | through line management. However, communication on Workers' rights is the responsibility of each site.   |
| <b>11. OCCUPATIONAL HEALTH AND SAFETY</b>  |                |  |
| 11.1a Occupational Health and Safety (OH&S) Management System                            | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |
| 11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. However, the Alcoa EHS Management System Standard is reviewed annually as part of the EHS Corporate Team review process and setting the next cycles' objectives and targets. The continuous improvement cycle is addressed by Corporate EHS during the Project Environmental, Health and Safety Review (PEHSR) process. Incident data analysis also triggers analysis of business changes that may impact Worker safety. |
| 11.2 Employee engagement on Health and Safety  | Not Applicable | This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.  |

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#### DOCUMENT CONTROL AND VERSION HISTORY

| REVISION | DATE             | NOTES   |
|----------|------------------|---|
| 0        | 23 August 2022   | Initial Certification Audit - Full Certification  |
| 1        | 15 February 2023 | Re-Certification Audit and Scope Change - Full Certification<br>Scope Change to apply V3; Correction to Public Headline Statement for Criteria 6.7a-f (equivalent to 6.7a-6.7e in V2) as Bauxite Mining is an included Supply Chain Activity. |