

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Alcoa - Aluminerie de Bécancour Inc.

CERTIFICATE NUMBER
147

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE
10 AUGUST 2024

DATE OF EXPIRY
9 AUGUST 2027

CERTIFIED SINCE
10 AUGUST 2021

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
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*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

Aluminium Smelting, Casthouse
and administrative associated
facilities at Aluminerie de
Bécancour Inc. (Canada).

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa - Aluminerie de Bécancour Inc.
CERTIFICATION SCOPE	Aluminium Smelting, Casthouse and administrative associated facilities at Aluminerie de Bécancour Inc. (Canada).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (1 – 3 June 2021)Re-Certification Audit and Scope Change (3 – 7 June 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">1 – 3 June 2021 (Initial Certification Audit)3 – 7 June 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">17 July 2021 (Initial Certification Audit)23 July 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 - 16 July 2021)</u></p> <p>The Audit Scope included Aluminium Smelting, Casthouse and administrative associated facilities at Alcoa - Aluminerie de Bécancour Inc. (Canada).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (3 – 7 June 2024)</u></p> <p>The Audit Scope included Aluminium Smelting, Casthouse and administrative associated facilities at Alcoa - Aluminerie de Bécancour Inc. (Canada).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">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

10 August 2024 – 9 August 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

9 August 2027

CERTIFICATE NUMBER

147



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

Alcoa's Aluminerie de Bécancour inc. (ABI) (the 'Entity') smelting operation commenced operation in 1986 and produces T-ingots, slabs and billets. The Entity is located on the south shore of the St. Lawrence River at Bécancour. It is situated within the industrial park of Bécancour. The St. Lawrence River is approximately one kilometre north-west of the Entity.

The Entity currently employs approximate 1,200 personnel and has an annual production capacity of 462,000 metric tonnes of Aluminium ingots intended to foundries for the manufacture of moulded parts, primarily for the automotive sector. The Entity has its own carbon plant to produce anodes, and raw materials are received at the nearby Bécancour Port. The Entity's on-site infrastructure and services include a smelting pot room using API8 technology, a Casthouse, administrative offices, equipment, Alumina and coke handling facility, process water treatment, supply storage, workshop and a laboratory.

The Entity is currently certified against ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and the ASI Performance Standard.

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	Medium	HIGH
RISKS	High	High	Medium	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity subscribes to a monthly legal monitoring service which ensures that it remains informed about the status of applicable legal and regulatory requirements. In addition, compliance audits are undertaken at prescribed intervals to validate the Compliance of its activities regarding both the environment and Occupational, Health and Safety.
1.2 Anti-Corruption	Conformance	To ensure appropriate responses to Corruption, the Entity has implemented the Alcoa Code of Conduct and Anti-Corruption Policy and program, which can be accessed at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/social-policy Employees most exposed to Corruption are identified and undertake specific training courses offered by the Entity. An integrity line to denounce practices that do not meet the Code of Conduct and/or the Anti-Corruption Policy and associated program is implemented and available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line
1.3a-e Code of Conduct	Conformance	The Alcoa Code of Conduct is a corporate policy covering business integrity, business activities, conflicts of interest, anti-Corruption, relations with customers and suppliers, and compliance with Human Rights. The Code of Conduct is reviewed regularly and is available in English and French: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/social-policy
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented both Corporate and site-level environmental, social and governance Policies. The Entity's Policies have been approved and signed by management, and are accessible to all employees. The Policies are an integral part of the Entity's Management Systems (quality, environment, energy and health and safety), which are ISO 14001:2015 and ISO 9001 certified. The Entity's local Policy integrates environmental, health and safety (EHS), social and governance aspects. The Corporate Policies, including the EHS Policy and Social Policy are publicly available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-EN.pdf https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/social-policy/social-policy-en.pdf https://www.alcoa.com/sustainability#Policies
2.2a-c Leadership	Conformance	The Entity's General Manager has overall responsibility and authority as leader for ASI certification to ensure conformity with ASI requirements. The role regularly informs all employees on the importance of certification and is supported by other managers.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has a documented, ISO 14001:2015 certified Environmental Management System.
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	<p>The Entity has implemented the Alcoa Corporate Social Management Performance Policy, establishes requirements regarding the Social Management System.</p> <p>Internal and external social risks that can affect the Entity's activities are identified and mitigated. Several mechanisms are used to support the issues and challenges of the community including the Community Consultation Committee, investment programs and foundation, and various sponsorships.</p> <p>There is a system for handling complaints and disputes and Entity has a training and monitoring system for employees and subcontractors.</p> <p>However, there is no evidence that the Alcoa Social Performance Management Policy is fully implemented at the Entity. While social risks on Entity operations have been assessed and addressed, there is no evidence that all social impacts were assessed and that performance plans are established and implemented to address them.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented an effective responsible sourcing Policy and Procedures that address environmental, social and governance issues. Alcoa's Supplier Standards are publicly available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/Supplier_Standards.pdf</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>There are no New Projects or Major Changes at the Entity.</p> <p>The Entity has developed environmental aspects and impacts assessments with the methodology based on ISO standards. All major projects must go through an impact study according to regulatory requirements and must include environmental, social and economic Impact Assessment of the project. Capital expenditure (CAPEX) projects go through a documented Health, Safety and Environment (HSE) review process that include social, cultural and Stakeholders Impact Assessment.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>There are no New Projects or Major Changes at the Entity.</p> <p>The Entity adheres to Alcoa's Corporate Standard to address potential Human Rights impacts in the case of Major Changes or New Projects. Any Major Change or New Project undergoes a documented review process that addresses social, cultural and Stakeholders impact assessment. All Major Projects must go through an impact study according to regulatory requirements and must include environmental, social and economic Impact Assessment of the present situation and that anticipated during the implementation of the project and once the project is completed.</p> <p>A Human Rights Due Diligence assessment has been performed to identify actual and potential Affected Populations. The Community Consultation Committee would also be consulted prior to any Major Project that may impact Affected Populations.</p>
2.7a-f Emergency Response Plan	Conformance	An effective Emergency Response Plan is in place, which has been informed by Stakeholder consultation and meets regulatory

CRITERION	RATING	COMMENT
		requirements. The ERPs are available upon request to all relevant internal and external Stakeholders
2.8a-d Suspended Operations	Conformance	Contingency plans in the event of suspension of activities are documented and managed by the Human Resources Director. The Entity has undertaken a risk assessment, which identifies risks that can potentially result in operational suspension or alteration. Each risk has their EHS impacts assessed and mitigation plan documented. In addition, an Emergency Response Plan is also in place and is reviewed annually.
2.9a-b Mergers and Acquisitions	Conformance	The Entity follows the Alcoa Corporate process for mergers and acquisitions. As part of these processes, a Due Diligence process on buyers/sellers is undertaken that incorporates Environmental, Social and Governance aspects.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity follows the Alcoa Corporate process that prescribes specific requirements in permits and operating licenses from national competent authorities and regulators relating to closure.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity provides monthly data to Alcoa Corporate regarding its financial, environmental, social and governance performance. The corporate team compile and publish the results through an annual Sustainability Report, available at: https://www.alcoa.com/sustainability/en
3.2 Non-compliance and Liabilities	Conformance	Alcoa Corporation's annual and quarterly reports are publicly available on the Company website, and discloses the Company's fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law: http://investors.alcoa.com/sec-filings
3.3a-c Payments to Governments	Conformance	All payments to Governments are taxes or tributes and are reported in the Annual Report, at: https://investors.alcoa.com/financials/annual-reports-and-proxy-statements/default.aspx For the Entity, only the payments required by regulation are made (such as authorisation requests, payment of sanitation certificate fees, payment of water withdrawal rights). Payments related to withholding taxes and employer contributions are managed by Alcoa Canadian Shared Services.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented an accessible, transparent, understandable and culturally and gender sensitive Complaints Resolution Mechanism, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line.asp Additionally, a 'Contact us' form is available on the Alcoa Canada website at: https://fr-ca.alcoa.com/canada/fr/contact

4. MATERIAL STEWARDSHIP

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity currently has a certified Environmental Product Disclosure (EPD) for the low-carbon product Ecolum. A Life Cycle Assessment (LCA) was conducted to support the EPD and is cradle-to-gate, including impacts from the raw material supply, transportation to the manufacturer and manufacturing stages.</p> <p>The Entity also has available the 2015 IAI Life Cycle Assessment report, and the US Aluminum Association EPD for Primary Aluminium Ingot. These are both cradle-to-gate assessments, and include Bauxite and Alumina inputs.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity's customers are free to request the LCA and/or the Ecolum EPD. Further information is available in the Sustainability Report: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p> <p>Alcoa has developed a LCA for Bauxite and Alumina considering a cradle-to-gate approach and customers can request this information. Marketing materials for Ecolum reference the EPD.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	<p>Scrap collection is monitored daily via a KPI available at all times with the objective of minimising the production of Scrap. Additionally, another KPI is in place to track the reduction in Scrap inventory. A plan is in place with the operators to reintroduce the waste.</p> <p>A complete computerised Scrap inventory is available to provide the alloy, weight and size of each ingot. Tools are also available to validate the compatibility of the ingot in inventory versus the casting in progress. The Entity's system records all the information related to the arrival of metal, the castings to be made, the available inventory and possible adjustments.</p>
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	<p>Whilst the Entity is not involved in End of Life recycling, Alcoa encourages End of Life recycling through global external activities. Alcoa is a member of The Recycling Partnership, the biggest Aluminium recycling organisation in North America, and as a founding partner, have contributed financially on an annual basis to their recycling programs, which are focused on post-consumer recycling all across the US. Further details are available at: https://recyclingpartnership.org/funding-partners/</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity's' GHG emissions are publicly reported via three mechanisms:</p> <p>1 - Alcoa Corporate for the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2022-Sustainability-Report.pdf</p> <p>2 - The National Pollutant Release Inventory (NPRI), at the Canadian</p>

CRITERION	RATING	COMMENT
		<p>Federal Level.</p> <p>3 - The Québec Atmospheric Emissions Inventory (IQÉA).</p> <p>These three entities require different calculations and emission factors. Calculations used for the annual provincial return are verified annually by a third party.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable, as the Entity is an Aluminium Smelter that started production before 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	The Entity's GHG emissions for Scope 1 and 2 are well below 8 tonnes CO ₂ e per metric tonne Aluminium and including Scope 3, are well below 11 t CO ₂ e/t Aluminium. Third party verification is undertaken of the Entity's Scope 1 and 2 emissions.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	<p>The Entity, as part of the Alcoa Corporation, has set itself GHG emission targets that are published annually in the Sustainability Report: https://www.alcoa.com/sustainability/en/pdf/2022-Sustainability-Report.pdf</p> <p>The Entity has set itself time-bounded targets for greenhouse gases and a goal of anode effect minutes per tank day. The GHG emissions data and objectives are monitored monthly by the management committee and the annual GHG emissions report is verified by a third party as required by the regulations. Actions related to these objectives are included in the operational plan. The Sustainability Report includes both Direct and Indirect GHG emissions.</p> <p>However, the Entity has not yet committed to a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario.</p>
5.4 GHG Emissions Management	Conformance	Site-specific Procedures are available to demonstrate how perfluorocarbon (PFC) emissions, carbon consumption, and fuel efficiency are controlled locally. There are processes in place to ensure that GHG emissions performance is maintained.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>An inventory of air pollutant emissions exists for the Entity, where emissions are reported annually according to both provincial and federal requirements via the National Pollutant Release Inventory, available at: https://pollution-waste.canada.ca/national-release-inventory/2023/1071</p> <p>At the Corporate level, certain programs are reported at monthly or quarterly frequencies, and certain data are automatically collected (derived) by the corporate body from the production database. Material air emissions for Alcoa global are also publicly disclosed in the annual Sustainability Report, available at: https://www.alcoa.com/sustainability</p>
6.2a-g Discharges to Water	Conformance	The Entity has a water management plan that refers to the ministerial authorisation (Part II), which covers all wastewater from the Entity's activities. This plan was last reviewed in 2023. The plan defines the discharge standards, and the requirements for monitoring discharges

CRITERION	RATING	COMMENT
		<p>including parameters, measurement and sampling frequencies, the methods of measurement, sampling, conservation and analysis of samples. An annual report quantifying water discharges is produced annually and submitted. Water discharges are also consolidated with other Alcoa sites and included in the Sustainability Report: https://www.alcoa.com/sustainability</p> <p>If a discharge exceeds the established threshold, the event is disclosed to the Government, analysed and internal procedures are reviewed as needed. The water management plan as well as the ministerial authorisation are available upon request.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has assessed risk areas of Spills and/or Leakages on site through a management plan which is periodically reviewed. Risks are classified and the receiving environment as well as the main mitigation actions are indicated. The Emergency Response Plan (ERP) also includes risks areas on site with remediation actions. The ERP is reviewed at least every five years and after the completion of drill exercises.</p> <p>The ministerial authorisation includes extensive control, monitoring and preventive actions regarding air, water and soil Spill and Leakage risks. Spills and Leakages management plans as well as the ministerial authorisation are available upon request.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented Procedures to disclose to affected parties the volume, type and potential impact of significant Spills immediately after an incident. Evidence reviewed during the Audit confirms these procedures are followed in the event of an incident.</p> <p>The Entity publicly discloses impact assessments of the Spills and remediation actions taken, and reports publicly on an annual basis in the Alcoa Sustainability Report, available at: 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 plan that is designed in accordance with the Waste Mitigation Hierarchy. The Entity has disclosed to the Ministry of Environment, on an annual basis, the quantity of Hazardous and Non-Hazardous Waste generated by the Entity, and associated waste disposal methods. The quantity of Hazardous and Non-Hazardous Waste and associated disposal methodology is published at the Corporate level in the Sustainability Report, available at: https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	<p>The Entity has a Spent Pot Lining (SPL) storage building, where SPL is stored prior to shipment. The storage is inspected quarterly in line with legal requirements. The SPL Management Plan defines the management of SPL reduction from source to disposal, and aims to reduce the disposal of SPL to landfill.</p> <p>Operational activities are optimised to minimise the production of buried residues to make it possible to segregate the carbon and the refractory part at the source, allowing the Entity to manage them separately. Recycling avenues for SPL are frequently assessed.</p>

CRITERION	RATING	COMMENT
		<p>The Alcoa Standard for SPL forbids the landfilling of untreated SPL and the Entity's SPL management program ensures it complies. Supplier audits and environmental permit validation are performed to ensure all SPL are treated before being landfilled.</p> <p>The Entity's SPL management program details the current situation of SPL recycling opportunities for landfill alternatives. Recycling processes are assessed and the management program is updated at least annually. The program also defines the storage and disposal requirements to ensure no SPL is discharged into marine or aquatic environments. The Entity's operational permit defines specific and strict legal requirements regarding the storage and disposal of SPL.</p>
6.8a-d Dross	Conformance	<p>The Entity currently maximises the recovery of Aluminium by treatment of Dross and Dross residues. Currently, close to 60% of metal inside Dross are recycled. The Entity is considering Dross residue recycling projects and targets for Dross reduction and recycling have been established. The Entity has planned that by end of 2025, all Dross will be treated internally. The Entity is also constantly reviewing for possible improvement to reduce Dross burial.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's water use is detailed in the ministerial authorisation. Industrial water consumption is calculated frequently and reported to the government as needed. The water withdrawal quantity by use and type are disclosed in the annual Sustainability Report, available at: https://www.alcoa.com/sustainability</p> <p>The Entity use process water supplied by the Société du Parc Industriel et Portuaire de Bécancour (SPIPB). The SPIPB withdraw its process water from the St. Lawrence river. The water used by the Entity represents less than 0.01% of the total flow of the St. Lawrence river.</p> <p>According to the WRI Atlas on water stress, Quebec has an overall water stress of 0.11. Hence, the Entity is not in an area of water scarcity. Refer to: https://wri.org/applications/aqueduct/country-rankings/?country=CAN&indicator=bws</p> <p>The Entity has a water management plan that brings together the information on the management of water at the plant.</p>
7.2a-e Water Management	Conformance	<p>The Entity is not located in an area of water scarcity and no Material risks have been identified regarding the water supply. The water management plan identifies projects that could lead to water consumption reduction but without time-framed action plans.</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The assessment of risks and significance of impacts on Biodiversity within the Entity's Area of Influence was last revised in 2024. The Entity's Biodiversity Action Plan defines the Area of Influence and the species/areas to be protected.</p> <p>No Material, or high level risks on Biodiversity were identified during the risk assessment. Ecosystem Services impacts on affected services and Stakeholders are also documented, identified and assessed.</p>

CRITERION	RATING	COMMENT
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment – Priority	Conformance	The Ecosystem Services impacted within the Entity's Area of Influence have been identified according to the Alcoa standard. Each service was reviewed to assess the degree of impact that the Entity's activities could have. The community was consulted via the Community Consultation Committee.
8.2a-g Biodiversity Management	Conformance	<p>Although no Material impacts on Biodiversity were identified in the Biodiversity report, an action plan was developed to protect Biodiversity. The Biodiversity Action Plan was presented to the Community Consultation Committee in June 2024.</p> <p>Two Ecosystem Services were identified as potentially impacted by the Entity's activities, although these are not considered Material. Action plans to mitigate these impacts are identified in the Ecosystem Services Registry and presented to the Consultation Committee of June 2024. Several actions are already underway, notably the fluoride reduction committee, and most actions have monitoring already in place (e.g. monitoring of effluent, atmospheric emissions, vegetation).</p>
8.3a-c Management of Priority Ecosystem Services	Conformance	Although Ecosystem Services were identified, the Entity does not depend on Priority Ecosystem Services as identified in the Ecosystem Services Registry. Two Ecosystem Services were identified as potentially impacted by the Entity's activities, although these are not considered Material. Action plans to mitigate these impacts are identified in the Ecosystem Services Registry and presented to the Consultation Committee of June 2024.
8.4 Alien Species	Conformance	Maritime transport is considered to be the route with the greatest potential for the introduction of invasive Alien Species, by ship transportation of coke and Alumina. International ships operating in Canadian waters are subject to laws and regulations relating to ballast water management.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Biodiversity report indicates that there are no UNESCO World Heritage Properties in the Entity's Area of Influence. The closest is the Lac St-Pierre biosphere reserve, which is several kilometres from the Entity. Legal monitoring and monitoring of major projects would identify any potential changes.
8.6a-d Protected Areas	Conformance	The Biodiversity Report indicates that there are no Protected Areas within the Entity's Area of Influence. If it were the case that a Major Project affects Protected Areas or that new Protected Areas were designated nearby, the legal monitoring process as well as the major project evaluation process (PESHR) would identify these areas.
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	Alcoa has a Human Rights Policy that addresses Child Labour, freedom of engagement, equality of opportunities, compensation, Freedom of Association and relationships with Indigenous People. It is aligned with the United Nations (UN) Guiding Principles on Business

CRITERION	RATING	COMMENT
		<p>and Human Rights. This Policy was last reviewed in January 2022, and is publicly available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</p> <p>A Human Rights Due Diligence was performed and documented following the model established by the Danish Institute for Human Rights. Indigenous Peoples, community organisations, Workers and suppliers were consulted during the Due Diligence process. Affected Populations are mapped in the Stakeholder Engagement Plan that determine the level of impact and engagement for each.</p> <p>There is no indication that the activities of the Entity have caused or contributed to adverse Human Rights impacts.</p> <p>Whilst Alcoa have regularly opened discussions and meetings with Indigenous Peoples, identified as potentially Affected Populations and Organisations in the Human Rights Due Diligence report, there is no evidence that the Complaints Resolution Mechanism of the Entity is shared with them, nor the suppliers.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity respects and applies the Charter of Rights and Freedoms. The hiring process is governed by the Equal Employment Opportunity Policy. The Policy is available to employees and on the Entity's website. There are currently no accusations or complaints regarding Discrimination based on a review undertaken during the Audit. There is also a supervised process regarding maternity leave, equal pay and Harassment.</p> <p>The strategy and affirmative action on gender equity are strengthened through the Alcoa Women's Network (AWN) actions.</p> <p>The Entity monitors leading indicators in Diversity Targets for incentive compensation which are measured for the organisation as a whole: overall gender diversity, percent of females in leadership roles and percent of female hires. Results and performance can be viewed in the Sustainability Report: https://www.alcoa.com/sustainability</p> <p>The Entity promotes the education and training of women through support of a trades training program and employment incentives.</p>
9.3a-i Indigenous Peoples	Conformance	<p>The Entity has not identified any presence of Indigenous Peoples within its Area of Influence, however, the Entity is maintaining close communication with the closest Indigenous community.</p> <p>Alcoa Corporate has implemented an Indigenous Peoples Policy that recognises and respects the diversity, cultures, customs and values of Indigenous, First Nation and other Land-Connected Peoples where Alcoa operates. This Policy is available at: https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/indigenous-peoples-policy/Indigenous-Peoples-Policy-English.pdf</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Conformance	<p>The Entity has not identified any presence of Indigenous Peoples within its Area of Influence and there is no New Project or Major Change planned or underway at the Entity.</p> <p>Regardless, the Alcoa Indigenous and Land Connected Peoples (ILP) Standard manages major changes to existing activities where ILP communities have legally recognised rights and interests to obtain their Free Prior and Informed Consent (FPIC). A summary of the Alcoa Indigenous and Land Connected Peoples Standard is available at:</p>

CRITERION	RATING	COMMENT
		https://www.alcoa.com/sustainability/social/indigenous-and-land-connected-people
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 to the Entity, as there is no New Project or Major Change planned or underway.
9.5a Cultural and Sacred Heritage - Identification	Conformance	<p>A Corporate Standard addresses a Cultural Heritage Management System in case of Major Change affecting the Area of Influence is implemented.</p> <p>The Entity completed an impact study prior to the site's construction. The Area of Influence established at the time does not reach the closest Indigenous community, which is located approximately ten kilometres from the boundary of the Entity. No sacred or cultural heritage sites and values have been identified and there are no New Projects or Major Changes planned or underway at the Entity.</p>
9.5b Cultural and Sacred Heritage - Impacts	Conformance	<p>A Corporate Standard addresses cultural heritage management in case of Major Change affecting the Area of Influence is implemented.</p> <p>The Entity completed an impact study prior to the site's construction. The area of influence established at the time does not reach the closest Indigenous community, which is located approximately ten kilometres from the boundary of the Entity.</p> <p>No sacred or cultural heritage sites and values have been identified and there are no New Projects or Major Changes planned or underway at the Entity.</p>
9.6a-i Displacement	Conformance	<p>The Entity assesses alternatives to avoid or minimise community displacement in case of expansion or operation modification projects. These assessments consider the environmental, social, cultural and financial risks, impacts, costs and benefits, as well as remediation measures applied for all jurisdictions through different legal and/or internal processes.</p> <p>The Entity's operations have always taken place on the site which was defined at the commencement of operations. No expansions have been undertaken and the nature of the operations has remained unchanged. As such, there has been no and therefore no situation where physical displacement occurred.</p> <p>If such a situation were to occur in future, the Entity would undertake a social and environmental impact study, in consultation and in cooperation with the affected parties and develop a Resettlement Action Plan.</p>
9.7a-h Affected Populations and Organisations	Conformance	The Entity has established a Community Advisory Committee to take into account the concerns of the surrounding community. This Committee meets at least annually and includes community organisations, political, educational and economic members. The Stakeholder Engagement Plan (available upon request) was last reviewed in 2023.

CRITERION	RATING	COMMENT
		<p>The Entity is engaged in the community through different levers, such as the Alcoa Foundation, the sponsorship program, the Bécancour Aluminerie Fund for sustainable communities, the Actions Program and the donation with social causes.</p> <p>In 2023-2024, the Alcoa Sustainability Fund is conducting an assessment of the impacts of investments in the community over the past ten years. This study will also provide an update of territorial issues and short and medium term directions.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	<p>For Conflict-Affected and High-Risk Areas (CAHRAs), the Entity uses the Alcoa Corporate Standard Operating procedure 'Commercial Due Diligence' which is a Due Diligence Program for Bauxite, Alumina, Aluminium and Scrap suppliers for the purpose of ASI certification. This process follows OECD guidance on specified countries. For CAHRAS, Alcoa Corporate follows OECD guidance on specified countries.</p> <p>Refer to: https://www.alcoa.com/global/en/contact/supplier/north-america/pdfs/standard-terms-and-conditions-services.pdf and https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>Risks for Conflict-Affected and High-Risk Areas are identified and assessed through the EcoVadis Platform for each supplier/contractor with structured methodology developed by EcoVadis in the frame of qualification of suppliers. There is no minimum monetary business level applied. Risks are identified for each contractor depending on its physical locations and activities in the world.</p> <p>Details of the methodology are described in the Alcoa Due Diligence Program.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>Risks for CAHRAs are identified and assessed through the EcoVadis Platform. When a potential supplier operates in a CAHRA or if a new CAHRA is identified, potential or actual suppliers that operate in the designated CAHRA are withdrawn from the list of qualified suppliers.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity has a Responsible Sourcing Procedure that prescribes Audits for specific suppliers. A third-party assessment contractor is currently undergoing qualification to perform these Audits.</p> <p>This ASI Performance Standard Audit also satisfies the requirements of this Criterion.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>Whilst there is limited reporting currently on this process, the broader reporting references the management framework and risks, and there are details on responses to some Human Rights-related risks.</p> <p>The Alcoa Sustainability Report (page 37) describes the Due Diligence process for responsible sourcing, which includes this Entity: https://www.alcoa.com/sustainability</p>
9.9 Security practice	Conformance	<p>The Entity and its private security contractors follow processes to ensure respect for Human Rights in line with recognised standards and good practices.</p>

10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity's employees are unionised and working conditions are agreed between Workers and employer through a Collective Labour Agreement. Freedom of Association is addressed by provincial and federal laws.
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 Canada where Applicable Law permits the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	<p>Recruitment is undertaken by local recruiters, in collaboration with Alcoa recruiters. The Alcoa Corporate team verifies this aspect through internal audits and recruitment checks. The minimum age to work at the Entity, whether as permanent, occasional or student employees is 18 years, as required by the Corporate and Human Rights Policy.</p> <p>The law on labour standards and on public education regulates Child Labour. A review of the list of all employees demonstrated that there were no Workers under 18 years of age at the time of the Audit. A supplier must also endorse the Supplier Standards, which prohibits the employment of minors.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity's Human Rights Policy and Code of Conduct both prohibit the use of Forced Labour. Recruitment is undertaken by local and regional recruiters and any employment agency contracted for this purpose is subject to the supplier qualification analysis. Upon hiring, the identity documents are validated and only copies of these documents are kept.</p> <p>There is no requirement in any labour agreement or employee handbook that requires the payment of a security deposit by any Worker. Some situations may generate a debt for the employee but repayment is strictly governed by agreements, Applicable Laws, Collective Agreements and Alcoa Policies in force.</p> <p>According to current laws, an employee can terminate his employment at any time within the time limit provided by law. Certain types of contracts for executives, such as those linked to the relocation or financial assistance program for studies, will however have penalties if the contract is terminated before the required time indicated in the contract.</p> <p>Alcoa has published a 2023 Modern Slavery Statement, available at: https://www.alcoa.com/sustainability/pdf/2023-Modern-Slavery-Statement.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity's Equal Employment Opportunity Policy prohibits all types of Discrimination. There is a process in place for the reporting and investigation of allegations of Discrimination, outlined in the Anti-Discrimination Policy.</p> <p>The Entity has engagement practices for and in support of diversity groups such as the Alcoa Woman Network (AWN), ABLE and EAGLE (LGBTQ), and the Code of Conduct ensures this practice. The Human Rights Policy also refers to non-Discriminatory acts and there is a zero tolerance for Discrimination or Harassment of any kind.</p> <p>An Inclusion Committee is in place to discuss, identify and plan action regarding diversity groups and Alcoa programs. This Committee</p>

CRITERION	RATING	COMMENT
		<p>meets quarterly and has 20 members representing all diversity groups.</p> <p>The recruitment, promotion and training processes are detailed and include objectives to ensure no Discrimination. Wages and promotions are defined in Collective Agreements for unionised Workers and in job bands and job description for salaried Workers. Training on the Code of Conduct, including non-Discrimination, are part of the onboarding process. The Entity monitors monthly diversity indicators, predominantly the women ratio within employees.</p>
10.5 Communication and engagement	Conformance	The Entity's Employees Committee, operating procedures and culture ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has a local Policy on workplace Harassment which prohibits any form of threat, insubordination, Harassment between employees or with superiors. It also defines the complaints process to ensure confidentiality and protection of victims but also resolution of conflict through investigations conducted by an external consultant.</p> <p>Training on workplace Violence and Harassment is also provided to all employees every three years, and training records are available and up to date. The Entity's Harassment and Bullying Free Workplace Policy is communicated during onboarding process via work day or file document. The Policy is available at: https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/harassment-bullying-free-workplace#:~:text=Alcoa's%20Anti%2DRetaliati%20Policy%20expressly,confidentially%20investigated%20and%20acted%20upon</p>
10.7a-c Remuneration	Conformance	<p>The Entity's Human Rights Policy states that Workers must receive a salary sufficient to cover basic needs. The remuneration is significantly higher than the minimum wage covering these needs. Union Workers' remuneration is defined in the Collective Agreements.</p> <p>Remuneration payments to Workers are made on a regular basis. The salary increase process for unionised employees is governed by Collective Agreements. For non-unionised employees, the Alcoa process applies and it provides for an annual increase, according to certain established rules.</p> <p>Overtime wages are defined in Collective Agreements and in the Overtime Policy for non-union employees. All remunerations are made in Canadian dollars.</p>
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave.
10.9a-b Informing Workers of Rights	Conformance	Unionised employees receive the Collective Agreement upon arrival and managers have access to the policy procedures manual. All employees are provided several different Policies, as well as the Code of Conduct and training upon hiring.

11. OCCUPATIONAL HEALTH AND SAFETY

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System, certified under ISO 45001:2018 since 2023.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's OH&S documentation is reviewed at least every three years. Alcoa publicly discloses its OH&S statistics and performance in its annual Sustainability Report: https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf</p> <p>Alcoa annually submit OH&S data to the International Aluminium Institute (IAI). This third party receives and aggregates data from across the Aluminium industry and provides statistics and metrics allowing comparison with peer organisations: https://international-aluminium.org/statistics/workplace-accidents/</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>Each sector of the Entity has an Occupational Health and Safety Committee in which employees can discuss, raise and correct issues relating to OH&S. These Committees meet periodically.</p> <p>In addition to these sector Committees, there is a Global Plant Health and Safety Committee on which all the Health and Safety Committees participate.</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	11 August 2021	Initial Certification Audit (Full Certification)
1	10 August 2024	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI PS V3.