

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Alcoa - Aluminerie de Deschambault S.E.C.

CERTIFICATE NUMBER  
148

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](mailto: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](http://www.Aluminium-stewardship.org)*

## CERTIFICATION SCOPE

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

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa - Aluminerie de Deschambault S.E.C
Certification Scope	Aluminium Smelting, Casthouse and administrative associated facilities at Aluminerie de Deschambault (Canada).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</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 (25 – 27 May 2021)</li><li>Re-Certification Audit and Scope Change (13 – 16 May 2024)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>25 – 27 May 2021 (Initial Certification Audit)</li><li>13 – 16 May 2024 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>17 July 2021 (Initial Certification Audit)</li><li>28 June 2024 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 25 February 2021)</u></p> <p>The Audit Scope included Aluminium Smelting, Casthouse and administrative associated facilities at Alcoa – Aluminerie de Deschambault (Canada).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</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 (13 – 16 May 2024)</u></p> <p>The Audit Scope included Aluminium Smelting, Casthouse and administrative associated facilities at Alcoa – Aluminerie de Deschambault (Canada).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>Certification</li></ul>

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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

10 August 2024 – 9 August 2027

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NEXT AUDIT TYPE

Re-Certification Audit

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NEXT AUDIT DATE

9 August 2027

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CERTIFICATE NUMBER

148



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

The Alcoa Deschambault Aluminium smelter (the 'Entity') commenced operation in 1992 and produces T-shape ingots and standard ingots. The Entity is located on the north shore of the St. Lawrence River between Trois-Rivières and Quebec City (46.69°N, 71.95°W) and it situated on a 166 hectare site in the industrial park of the city Deschambault-Grondines with a total area of 526 ha. The St. Lawrence River is approximately four kilometres south-east of the plant. The Entity has approximately 660 employees on site with a current annual production capacity of 288,000 metric tonnes of Aluminium ingots intended to foundries for the manufacture of moulded parts, particularly for the automotive sector.

The Entity has its own carbon plant to produce anodes, with raw materials being received at the Trois-Rivières Port. The Entity's site include smelting potroom using AP30 technology, a casthouse, administrative offices, equipment, alumina and coke handling facility, process water treatment, supply storage, workshop and laboratory. The Entity is currently certified to ISO Standards 9001: 2015, 14001: 2015, 50001: 2018, 45001: 2018 and IAFT standards.

## 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	High	HIGH
<b>OVERALL</b>		<b>HIGH</b>		

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity subscribes to a monthly legal monitoring service which ensures that it remains informed on 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 Corporate Code of Conduct and Anti-Corruption Policy and program that can be accessed on Alcoa website at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance">https://www.alcoa.com/global/en/who-we-are/ethics-compliance</a>  Employees most exposed to Corruption are identified and undertake specific training courses. An integrity line to denounce practices that do not meet the Code of Conduct and/or the Anti-Corruption Policy and program is in place and published at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line</a>
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 communicated to all of the Entity's Workers during the onboarding process and is available in both English and French at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct.asp">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct.asp</a>
<b>2. POLICY AND MANAGEMENT</b>		
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, ISO 45001:2018, ISO 50001:2018 and ISO 9001:2015 certified. The Entity's Policy integrates the environmental, health and safety (EHS), social and governance aspects.  The Corporate Governance Guidelines define the way the Entity does business. It starts with its Values and Business Conduct Policies. In addition, a specific Committee of the Board has been formed to provide guidance on matters relating to the Company's corporate and social responsibility, including but not limited to safety and health, good corporate citizenship, environmental sustainability, and social issues.  The Entity's Policies and Procedures related to Environmental, Social and Governance aspects are mainly communicated externally through their website, contracts and internally through their hiring processes. For Policies refer to: <a href="http://investors.alcoa.com/corporate-governance/governance-documents">http://investors.alcoa.com/corporate-governance/governance-documents</a>

CRITERION	RATING	COMMENT
		<p><a href="https://www.alcoa.com/global/en/who-we-are/values/default.asp">https://www.alcoa.com/global/en/who-we-are/values/default.asp</a></p> <p><a href="https://www.alcoa.com/sustainability/en/environment-health-safety.asp">https://www.alcoa.com/sustainability/en/environment-health-safety.asp</a></p> <p><a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/default.asp</a></p>
2.2a-c Leadership	Conformance	The Entity's General Manager, is the nominated leader for ASI Certification and has overall responsibility and authority to ensure conformity with ASI requirements. The role regularly informs all employees on the importance of Certification and is supported by other managers.
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	Conformance	<p>The Entity has implemented a Social Management System that identifies each social stakeholder, assesses social and community impacts to them and draws up projects and strategies to address them.</p> <p>A Community Consultation Committee has been implemented to ensure identification of Stakeholders' needs and expectations and the Entity's activities' impacts on them. The Alcoa fund is available to help social and community projects. Details can be found at: <a href="https://www.alcoa.com/canada/fr/engagement/fund">https://www.alcoa.com/canada/fr/engagement/fund</a></p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity is part of the Alcoa-implemented global Supplier Sustainability Program for its supply chain. The program provides Due Diligence of, and insight into, the environmental, social and governance performance of key suppliers and a framework to work with them to advance sustainability. Further information on the Supplier Sustainability Program is available at: <a href="https://www.alcoa.com/sustainability/en/communities/supply-chain">https://www.alcoa.com/sustainability/en/communities/supply-chain</a></p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>No major changes have taken place since the start of the Entity's activities.</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. These impact studies must include environmental, social and economic impact assessment of the project. Capital expenditure (CAPEX) projects are subjected to a documented Health, Safety and Environment (HSE) review process that identify and address environmental, H&amp;S, energy, community and biodiversity potential impacts.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>No major changes have taken place since the start of the Entity's activities.</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. . In addition, all major projects must go through an impact study according to regulatory requirements and must include environmental, social and economic issues that contain an</p>

CRITERION	RATING	COMMENT
		<p>assessment of the present situation and that anticipated during the implementation of the project and once the project is completed.</p> <p>At the Entity level, all projects go through a review process and are documented in an analysis that contain social, cultural and Stakeholders' impact assessment.</p>
2.7a-f Emergency Response Plan	Conformance	<p>An effective Emergency Response Plan (ERP) is in place, which has been communicated and developed in collaboration with relevant Stakeholders such as local emergency services and subcontractors. The Plan is reviewed at least every two years and a calendar has been established to coordinate training and drill exercises.</p> <p>Emergency Response Plans are reviewed after each emergency situation and drill through a documented review process. The ERPs are available upon request to all relevant internal and external Stakeholders while ERPs covering key scenarios that may affect specific Stakeholders at a higher level are shared directly with them for consultation and comments.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has identified its risks regarding situations outside its control for all activities. This assessment plan is reviewed periodically or when any changes or new challenges are added that require a risk assessment. Each situation is assessed regarding environmental, health and safety, reputation, financial and social impacts. A crisis committee has been established in case of major situations that may result in a partial closure or operation disturbance.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity is subject to the Alcoa Corporate process for mergers and acquisitions. These processes include a Due Diligence on buyers and sellers that incorporates Environmental, Social and Governance aspects.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity is subject to the Alcoa Corporate procedure that has been established, reflecting specific requirements in permits and operating licenses from national competent authorities and regulators.</p>
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>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:  <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>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. The Quebec Ministry of Environment also provides a public database where all fines and monetary penalties to individual and corporate entities are disclosed:  <a href="http://investors.alcoa.com/sec-filings">http://investors.alcoa.com/sec-filings</a>  <a href="https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</a>  <a href="https://www.registres.environnement.gouv.qc.ca/sanctions/recherche.asp">https://www.registres.environnement.gouv.qc.ca/sanctions/recherche.asp</a></p>

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	<p>All payments to Governments are taxes or tributes and are reported in the Annual Report, available at: <a href="https://s29.q4cdn.com/945634774/files/doc_financials/2023/ar/alcoa-corp-2023-annual-report-final-bookmarked.pdf">https://s29.q4cdn.com/945634774/files/doc_financials/2023/ar/alcoa-corp-2023-annual-report-final-bookmarked.pdf</a></p> <p>For the Entity, only payments required by regulation are made (such as authorization request, payment of sanitation certificate fees, and the payment of water withdrawal rights). Payments related to withholding taxes and employer contributions are managed by Alcoa Canadian Shared Services.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>Complaints, comments and suggestions from employees and interested parties are managed by the Entity's Environment Department. The Department has developed a communications register allowing the entry, processing and the response to the various internal and external communications requests received.</p> <p>The Entity's communication procedure also explains how to deal with these requests. Although it is the environmental sector that developed this complaint handling procedure, complaints can be of any type, environmental, social or ethical. Any complaint or concern from the public can be lodged at: <a href="https://fr-ca.alcoa.com/canada/fr/contact">https://fr-ca.alcoa.com/canada/fr/contact</a></p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>Alcoa 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. Details on Ecolum can be found at: <a href="https://www.alcoa.com/sustainability/en/pdf/Ecolum.pdf">https://www.alcoa.com/sustainability/en/pdf/Ecolum.pdf</a></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. The EPD is also available online at: <a href="https://spot.ul.com/main-app/products/detail/5ad1f04355b0e82d946abb93?page_type=Products%20Catalog">https://spot.ul.com/main-app/products/detail/5ad1f04355b0e82d946abb93?page_type=Products%20Catalog</a></p> <p>Further information is available in the Sustainability Report: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></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. There are also separate storage areas to prevent errors.</p>



CRITERION	RATING	COMMENT
		Support is also given to all suppliers for any concerns or for general questions regarding Alcoa's Supplier Standards via: <a href="mailto:SupplierSustainability@alcoa.com">SupplierSustainability@alcoa.com</a>
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	Whilst the Entity is not involved in End of Life recycling of by-products, Alcoa is promoting End of Life recycling through global external activities. Alcoa is a member of The Recycling Partnership, the biggest Aluminium recycling organisation in North, 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 United States. Further details are available at: <a href="https://recyclingpartnership.org/funding-partners/">https://recyclingpartnership.org/funding-partners/</a>
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's GHG emissions and energy consumption data are publicly reported via three mechanisms: 1 - Alcoa Corporate for the Sustainability Report: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a> 2- The National Pollutant Release Inventory (NPRI), at the Canadian Federal Level. 3 - The Québec Atmospheric Emissions Inventory (IQÉA).  These three entities require different calculations and emission factors. Calculations used for the annual provincial return are verified annually by a third party.
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity as it commenced operation in 1992.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Conformance	The Entity's GHG emissions are well below 11 tonnes CO <sub>2</sub> e per metric tonne Aluminium, as the primary source of energy is provided by hydroelectricity.
5.3a-e GHG Emissions Reduction Plans	Minor Non-Conformance	The Entity, as part of the Alcoa Corporation, has set itself GHG emission targets that are published annually in the Sustainability Report: <a href="https://www.alcoa.com/sustainability/en/pdf/2022-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/en/pdf/2022-Sustainability-Report.pdf</a>  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. Actions related to these objectives are included in the operational plan. The Sustainability Report includes both Direct and Indirect GHG emissions.  However, the Entity has not yet committed to a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario.

CRITERION	RATING	COMMENT
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 performance is maintained.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	An inventory of air pollutant emissions exists. Emissions are reported annually according to both provincial and federal requirements. At the Corporate level, certain programs are reported at monthly or quarterly frequencies, and certain data are automatically collected by the corporate body from the production database. Alcoa global air emissions are publicly disclosed in the annual Sustainability Report at: <a href="https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf</a>
6.2a-g Discharges to Water	Conformance	<p>There is no direct discharge of process water to the environment. For new process water usage, rainwater is accumulated so water is not pumped from the environment. Water discharges are reported monthly to Alcoa Corporate via a performance indicator dashboard and are incorporated into the annual Alcoa Sustainability Report, available online at: <a href="https://www.alcoa.com/sustainability">https://www.alcoa.com/sustainability</a></p> <p>A documented water management plan is implemented at the Entity regarding water mapping withdrawal and discharge and the management of water resources. This plan was updated within the last two years.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>An ISO 14001 Environmental Management System is implemented and includes a risk assessment that describes all major environmental events, including Spills and Leakage. Emergency measures plans (EMP) are in place to respond to these emergency situations that could affect the environment in order to specify how to react and how to intervene.</p> <p>Processes are in place to manage emergencies, external communication, compliance controls and a monitoring programme in place to prevent and detect these Spills and Leakages.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has implemented a documented Procedure to promptly communicate to Affected Populations and Organisations in case of any event that could affected these Affected Populations and Organisations. However for several years there has been no situation that could have an impact on Affected Populations and Organisations. If so, every Spill to the soil or air would be immediately declared to the Ministry of Environment.
6.5a-c Waste Management and Reporting	Conformance	The Entity has developed and implemented a waste management program in compliance with the Alcoa Standard. The waste management program includes all waste generated by the plant and is up-to-date. Both Corporate and local objectives are in place that aim for the reduction of waste generated over time and several projects and avenues are identified in respect of the Waste Mitigation Hierarchy. In addition, impacts of waste generation on human well-being are assessed but no Material impact has been identified as a result.

CRITERION	RATING	COMMENT
		The quantity of Hazardous and Non-Hazardous Waste by disposal methods is publicly disclosed in the annual Alcoa Sustainability Report.
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's waste management program defines the management of Spent Pot Lining (SPL) from different sources. The Entity's operating permit defines specific legal requirements regarding the storage, inspection and disposal of SPL as does the Alcoa Corporate Standard. The SPL Management Plan defines the management of SPL reduction from source to disposal, and aims to reduce the disposal of SPL at landfill.</p> <p>Operational activities are optimized to minimize 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 currently being assessed.</p> <p>The Alcoa Standard for SPL forbids the landfilling of untreated SPL and the Entity 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.</p>
6.8a-d Dross	Conformance	<p>The process in place to transfer Liquid Aluminium from crucibles to the furnaces reduces the production of Dross, which is in line with the hierarchy of waste management. Foam produced is sent to a transformer and then sieved in order to reintroduce part of the Dross generated to the plant process. All Dross from the foundry that is not reintroduced to the processes is sent to a recycler in order to recover as much Aluminium as possible.</p> <p>The Entity sends Dross to its only supplier for the treatment of its scum because this supplier can recycle 100% of the by-product of the scum treatment.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has prepared a water balance sheet which identifies and maps each source of water and its use as well as all discharge points. The water withdrawal metrics are publicly disclosed in the Alcoa Sustainability Report, available at: <a href="https://www.alcoa.com/sustainability">https://www.alcoa.com/sustainability</a></p> <p>The Entity has completed a corporate water risk assessment and identified that it is located in a low water risk area. The assessment also identifies specific risks related to the water withdrawal and use on the Watershed from the Facility's activities.</p>
7.2a-e Water Management	Conformance	The Entity did not identify any significant water-related risks. However a rainwater management program has been implemented to identify and manage water usage directly sourced from rain.

CRITERION	RATING	COMMENT
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Minor Non-Conformance	<p>An assessment on Ecosystem Services that could be impacted by the Entity's activities was undertaken in 2024. The risks and potential impacts are identified in the Biodiversity and Ecosystem services Report and assessed in an impact assessment and prioritisation registry. Meetings with the relevant Stakeholders have been organised to consult on the evaluation.</p> <p>However, the risk to and potential impacts on Biodiversity and Ecosystem Services from the land use and activities of the Entity at Port de Trois-Rivières specifically, has not been assessed. The Entity receives, manages and ships Alumina and coke from this location, thus making those installations part of the Entity's Area of Influence.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Ecosystem Services that could be impacted by the Entity's activities was undertaken in 2024. Meetings with the relevant Stakeholders have been organised to consult on the evaluation.
8.2a-g Biodiversity Management	Conformance	The Entity's Biodiversity risk assessment has not identified any Material risks to Biodiversity, however a Biodiversity Action Plan to mitigate risks that are already low as well as a time-bound targets has been documented and implemented.
8.3a-c Management of Priority Ecosystem Services	Conformance	Priority Ecosystem Services impacted by the Entity's activities have been identified and assessed, however an action plan to mitigate risks that are already low as well as a time-bound targets has been documented and implemented.
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 transporting coke and Alumina. International ships operating in Canadian waters are subject to laws and regulations relating to ballast water management. However, no potential introduction of Alien Species that could have significant adverse impacts on Biodiversity has been identify within the Area of Influence and activities of the Entity.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	No World Heritage Properties have been identified in the Entity's Area of Influence. Refer to: <a href="https://whc.unesco.org/en/list/">https://whc.unesco.org/en/list/</a>
8.6a-d Protected Areas	Conformance	Whilst Protected Areas have been identified in the nearby region surrounding the Entity, none are located within the Entity's defined Area of Influence.
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.
<b>9. HUMAN RIGHTS</b>		

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Conformance	<p>Alcoa has a Human Rights Policy that address Child Labour, freedom of engagement, equality of opportunities, compensation, freedom of association, relationship with Indigenous People. It is aligned with the United Nations (UN) Guiding Principles on Business and Human Rights. The Policy is publicly 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></p> <p>A Human Rights Due Diligence assessment was undertaken in 2024 which identified any issues that may need to be addressed. This Due Diligence was conducted in consultation with several Rightsholders that may be impacted by the Entity's activities.</p> <p>At the time of the Audit, no adverse impact on Human Rights was raised nor identified. However, if this was the case, the Due Diligence process identify and implement an action plan to mitigate the social impacts.</p> <p>The Entity also has a legal process that requires all major projects to do an impact analysis. From this analysis, emerges the social impacts and actions that must be implemented to mitigate them.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Equal Employment Opportunity Policy is available on the Alcoa's website at: <a href="https://www.alcoa.com/global/en/careers/pdf/Alcoa-EEO.pdf">https://www.alcoa.com/global/en/careers/pdf/Alcoa-EEO.pdf</a></p> <p>Over recent years, the strategy and affirmative action on gender equity was strengthened through the Alcoa Women's Network (AWN) actions. The Entity also respects and applies the Charter of Rights and Freedoms of the government of Quebec.</p> <p>There are currently no charges or complaints regarding Discrimination on the basis of gender. A diversity committee is also established that implements strategies to attract women to different positions as well as to have a work environment that is as inclusive as possible.</p> <p>The effectiveness of the Alcoa programs and action plans to promote gender equity is disclosed in the annual Alcoa Sustainability Report: <a href="https://www.alcoa.com/sustainability">https://www.alcoa.com/sustainability</a></p>
9.3a-i Indigenous Peoples	Conformance	<p>Although there is no immediate presence of Indigenous Peoples or their lands, territories and resources in the Entity's Area of Influence, Alcoa has taken the initiative to communicate with the Indigenous community located 50 kilometres from the Entity, as part of its Human Rights Due Diligence. Moreover, the Indigenous community has not identified any site or landmark of cultural importance near the Entity. The First Nations people are actively developing their archives, history and reappropriating traditions based on the content of archived documents.</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Conformance	<p>Although there is no immediate presence of Indigenous Peoples or their lands, territories and resources in the Entity's Area of Influence, Alcoa has taken the initiative to communicate with the Indigenous community located 50 kilometres from the Entity, as part of its Human Rights Due Diligence. Moreover, the Indigenous community has not identified any site or landmark of cultural importance near the Entity. The First Nations people are actively developing their archives, history and reappropriating traditions based on the content of archived documents.</p>

CRITERION	RATING	COMMENT
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	Conformance	<p>Through its Indigenous Peoples Policy, the Entity is committed to the principle of Free, Prior, Informed, Consent and other tenets of the International Labour Organisation (ILO) Convention No. 169 on Indigenous and Tribal Peoples, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). There are no new projects or major changes planned or underway at the Entity, and there has been no new project or major change since the beginning of operations in 1992.</p> <p>The Indigenous Peoples Policy is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy</a></p>
9.5a Cultural and Sacred Heritage – Identification	Conformance	<p>The Entity has implemented the Alcoa Corporate Standard to implement a Cultural Heritage Management System (CHMS) inclusive of a cultural heritage baseline, impact and risk assessments at the local level. All currently known cultural sites are listed by a local non-profit organization (Culture Patrimoine Deschambault Grondines). Register is available at: <a href="https://www.culturepatrimoineidg.com/">https://www.culturepatrimoineidg.com/</a></p>
9.5b Cultural and Sacred Heritage – Impacts	Conformance	<p>The Entity has implemented the Alcoa Corporate Standard to implement a Cultural Heritage Management System (CHMS) inclusive of a cultural heritage baseline, impact and risk assessments at the local level. All currently known cultural sites are listed by a local non-profit organization (Culture Patrimoine Deschambault Grondines). Register is available at: <a href="https://www.culturepatrimoineidg.com/">https://www.culturepatrimoineidg.com/</a></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>There has been no resettlement at the facility and therefore no situation where physical displacement occurred.</p> <p>If such a situation was to occur in future, the Entity would perform 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	<p>The Entity has a Stakeholder Engagement Process to ensure positive Stakeholder relationships and effective means for resolving community concerns. The Entity completes an annual Stakeholder Engagement Plan on an annual basis. A Community Consultation Committee has been established to ensure identification of Stakeholders' interests or impacts on their livelihoods. The actions of the engagement plan is publicly disclosed and discussed during Community Consultation Committee meetings.</p> <p>The Entity has not yet identified any issues affecting Local Communities. However, the Entity is engaged in the community through various actions (Alcoa Foundation, Donations and</p>

CRITERION	RATING	COMMENT
		Sponsorships and Fund for sustainable communities) to respect and support their livelihoods.
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: <a href="https://www.alcoa.com/global/en/contact/supplier/north-america/pdfs/standard-terms-and-conditions-services.pdf">https://www.alcoa.com/global/en/contact/supplier/north-america/pdfs/standard-terms-and-conditions-services.pdf</a> and <a href="https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf">https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf</a></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	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.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity's 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 <a href="https://www.alcoa.com/sustainability">https://www.alcoa.com/sustainability</a></p>
9.9 Security practice	Conformance	The contract guard agencies engaged by the Entity are regulated and licensed by the local regulatory authority. The Entity has an agreement with a security firm for the management of access control to the plant only. In case of any on-site security issue, it is forwarded to Alcoa intervention team to address the situation.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity's employees are not unionised. Working conditions are reviewed through joint committees on which the employees set salary scales and total compensation. Freedom of Association for Workers is ensured through both provincial and federal laws.

CRITERION	RATING	COMMENT
		The Entity respect the rights of Workers to Collective Bargaining, participate in any collective bargaining process in good faith though the recommendations of the compensation committees must be approved by the management committee and by the corporate body, following the same model as any unionised facility.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as it operates in a country (Canada) where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour	Conformance	<p>The Entity has several Policies, Procedures and its Code of Conduct to ensure Child Labour does not occur on site, as defined in ILO Conventions C138 and C182 and Canadian law.</p> <p>The Entity's Human Rights Policy and Code of Conduct both prohibit the use of Child Labour. Procedures on site were seen to be effective therefore there is no opportunity for Child Labour and/or hazardous working. Subcontractor agreements also prohibit any Worker under 18 years of age on site.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity's Human Rights Policy and Code of Conduct are implemented effectively through site procedures as well as procurement procedures and third party assessment. It does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies.</p> <p>There is no employment agreement or agreement with a recruiting company that requires employees to pay any type of compensation or advance. Suppliers are managed by procurement and contracts reviewed do not contravene the laws in force in Canada. All employees have Canadian citizenship and have the right to work in Canada and Quebec. No one who is not in good standing could work at the Entity and no restrictions on movement or confiscation of documents is applied. Employees are free to terminate their contract at any time.</p> <p>Alcoa has published a 2023 Modern Slavery Statement, available at: <a href="https://www.alcoa.com/sustainability/pdf/2023-Modern-Slavery-Statement.pdf">https://www.alcoa.com/sustainability/pdf/2023-Modern-Slavery-Statement.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has Policies, a Code of Conduct and procedures in place that effectively ensure equal opportunities and it does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker.</p> <p>It was observed during the Audit that the Local Employees Committee, communications, the hiring process and implemented corporate programs ensure the promotion of non-Discriminatory and inclusive culture.</p>
10.5 Communication and engagement	Conformance	The 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.



CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented its Code of Conduct and provides training on compliance with these elements on an annual basis. The Entity has developed a corrective action guide, which prohibits any type of Violence, Harassment or Discrimination between employees or any member of staff. Disciplinary measures regulate this type of behaviour.</p> <p>A Policy on workplace Violence and Harassment has been implemented. A process is in place to report and investigate allegations of Harassment. All Workers have completed training on the Policy and must sign it during the onboarding process. The Harassment and Bullying Free Workplace Policy is available at: <a href="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">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</a></p>
10.7a-d Remuneration	Conformance	<p>The Entity's Policy, Code of Conduct and Procedures are effective in ensuring the rights of Workers to a living wage and ensuring that wages paid for a normal working week shall always meet at least a legal or industry minimum standard and are sufficient to meet the basic needs of Workers and to provide some discretionary income.</p> <p>The Entity facilitates wage payments that are timely, in legal tender and fully documented.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>All Workers sign the Code of Conduct and the various Policies during the onboarding process. All Workers rights are described in the Code of Conduct. The right of association is defined in the Code and is also a right at the level of government institutions.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity's Occupational Health and Safety (OH&amp;S) Management System has been certified under ISO 45001:2018 since 2023. The scope of the certified OH&amp;S Management System incorporates all activities on site.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity reviews its OH&amp;S Management System every year as per the Alcoa Corporate requirement. Alcoa Corporate compares the effectiveness of the OH&amp;S Management System between all its production plants. Furthermore, Alcoa annually submits OH&amp;S data to the International Aluminium Institute (IAI). This third party receives and aggregates data from all the Aluminium industry allowing comparisons on the effectiveness of OH&amp;S performance with peer organisations: <a href="https://international-aluminium.org/statistics/workplace-accidents/">https://international-aluminium.org/statistics/workplace-accidents/</a></p> <p>Data and statistics on OH&amp;S from Alcoa production sites are available in the Alcoa Annual Sustainability Report. For 2022, see: <a href="https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</a>, Appendix C, page 135 to 138.</p>

CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Conformance	<p>Each division of the Entity has an OH&amp;S Committee in which employees discuss, raise and correct issues relating to occupational health and safety. These Committees meet periodically.</p> <p>In addition to these sector committees, there is a Global Plant Health and Safety Committee on which all sectorial 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 the ASI Performance Standard V3