

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# ARCONIC CORPORATION

CERTIFICATE  
NUMBER

60

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

20 DECEMBER 2022

DATE OF EXPIRY

19 DECEMBER 2025

CERTIFIED SINCE

20 DECEMBER 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John'.

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

CERTIFICATION SCOPE

Arconic Corporate Center, USA: Corporate governance, environmental and social processes set to support the manufacturing sites. Centralized ESG supplier assessments.  
Kőfém, Hungary: Casthouse and Aluminium Product fabrication.  
Bohai, China: Casthouse and Aluminium Product fabrication.  
Tennessee, USA: Casthouse, semi-fabrication, and Material Conversion (Production and Transportation)  
Kitts Green, UK: Casthouse, semi-fabrication, Material Conversion (Production and Transportation)

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Arconic
ENTITY NAME	Arconic Corporation
CERTIFICATION SCOPE	<p>Arconic Corporate Center, USA: Corporate governance, environmental and social processes set to support the manufacturing sites. Centralized ESG supplier assessments.</p> <p>Köfém, Hungary: Casthouse and Aluminium Product fabrication.</p> <p>Bohai, China: Casthouse and Aluminium Product fabrication.</p> <p>Tennessee, USA: Casthouse, semi-fabrication, and Material Conversion (Production and Transportation)</p> <p>Kitts Green, UK: Casthouse, semi-fabrication, Material Conversion (Production and Transportation)</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Casthouses</li><li>• Semi-Fabrication</li><li>• Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (30 October – 29 November 2019)</li><li>• Scope Change Audit (28 November 2019 – 10 January 2020)</li><li>• Scope Change Audit (2 – 4 November 2020)</li><li>• Surveillance Audit (9 – 10 June (Remote) and 6 – 7 July 2021 (On-site))</li><li>• Re-Certification Audit and Scope Change (31 August – 27 October 2022)</li><li>• Scope Change Audit (17 – 19 April 2023)</li><li>• Surveillance Audit (18 October 2023)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 30 October – 29 November 2019 (Initial Certification Audit)</li><li>• 28 November 2019 – 10 January 2020 (First Scope Change Audit)</li><li>• 2 – 4 November 2020 (Second Scope Change Audit)</li><li>• 9 – 10 June 2021 (Remote) and 6 – 7 July 2021 (On-site) (Surveillance Audit)</li><li>• 31 August – 27 October 2022 (Re-Certification Audit and Scope Change)</li><li>• 17 – 19 April 2023 (Scope Change Audit)</li></ul>

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- 18 October 2023 (Surveillance Audit)
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AUDIT REPORT  
SUBMISSION

- 26 November 2019 (Initial Certification Audit)
  - 14 February 2020 (First Scope Change Audit)
  - 18 December 2020 (Second Scope Change Audit)
  - 16 November 2021 (Surveillance Audit)
  - 20 January 2022 (Re-Certification Audit and Scope Change)
  - 7 August 2023 (Scope Change Audit)
  - 18 July 2024 (Surveillance Audit)
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AUDIT SCOPE

Initial Certification Audit (30 October – 29 November 2019)

The audit scope covered the activities at the Arconic Inc. Corporate Center in Pittsburgh, United States and Arconic Samara, Russia.

Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication
- Material Conversion

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

First Scope Change Audit (28 November – 10 January 2020)

The audit scope covered the activities at Arconic-Köfém, Hungary and Arconic Itapissuma, Brazil.

Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication
- Material Conversion

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

Second Scope Change Audit (2 – 4 November 2020)

The audit scope covered the activities at Arconic Bohai, China.

Arconic Itapissuma was removed from the certification scope as part of this second scope change audit.

Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication

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

Surveillance Audit (9 – 10 June (Remote) and 6 – 7 July 2021 (On-site))

The audit scope covered the Arconic Corporate Center, USA and Arconic Bohai, China.

Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication

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- Material Conversion (Production and Transformation)

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

At the time of the audit access to all the sites was not possible, due to COVID-19 related travel restrictions. The audit of the Bohai site in China was undertaken on-site, whilst the Corporate Center in USA was audited as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

#### Re-Certification Audit and Scope Change (31 August – 27 October 2022)

The audit scope covered the Arconic Corporate Center, USA, Arconic Köfém, Hungary and Arconic Tennessee, USA to include the facility in the certification scope.

Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication
- Material Conversion (Production and Transformation)

The ASI multi-site sampling approach was undertaken, and the Arconic Bohai, China facility was not included as this was covered in the 2021 Surveillance Audit. Arconic Samara, Russia was removed from the certification scope.

#### Scope Change Audit (17 – 19 April 2023)

The audit scope covered the Arconic Corporate Center and Kitts Green Operations, UK to include the facility in the certification scope.

Supply chain activities included in the audit scope:

- Casthouses
- Material Conversion (Production and Transformation)

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

#### Surveillance Audit (18 October 2023)

The audit scope covered the activities at Arconic Bohai, China.

Supply chain activities included in the audit scope:

- Casthouses
- Semi-Fabrication

Criteria in the ASI Performance Standard that were identified as non-conformities in previous Audits of the Bohai facility were included in the audit scope.

- Certification

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AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

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

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CERTIFICATION  
PERIOD

20 December 2022 – 19 December 2025

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

19 December 2025

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CERTIFICATE  
NUMBER

60

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>Arconic has systems in place to maintain awareness of and ensure compliance with Applicable Law, and the corporate procedures are effectively embedded at the location-level. The Entity defines a compliant governance approach, including legal counsels in all regions where Arconic operates, maintenance of a Legal Registry and use of external legal service providers for complementing in-house competencies. In addition, a compliance monitoring system at local locations was observed. This included a compliance register and monitoring system and regular communication with Workers and Contractors. The Köfém, Hungary, Kitts Green, UK, and Tennessee. USA Operations maintains an ISO 14001:2015 certified Management System, and surveillance audit records were reviewed.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established policies, procedures, training, and Due Diligence to work against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. The Arconic Anti-Corruption Policy is available at: <a href="https://www.arconic.com/anti-corruption-policy/">https://www.arconic.com/anti-corruption-policy/</a></p> <p>As part of its anti-corruption and compliance system, the Entity has implemented a risk management process, gift acceptance procedures and guidance on interactions with government officials. Training programmes, anti-corruption management systems and ethical and complaints mechanisms are effectively implemented. The Entity operates site-level self-assessments as part of its internal audit process.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance (ESG) performance. The Code of Conduct is reviewed regularly by management, training is provided to all employees during onboarding and on an annual basis. The Code of Conduct is available in different languages: <a href="https://www.arconic.com/code-of-conduct">https://www.arconic.com/code-of-conduct</a></p> <p>Employee training and employee awareness of the Code of Conduct and available grievance mechanisms were verified during local site visits to in-scope Facilities.</p> <p>The Code of Conduct and ethics and compliance program are disclosed in the ESG Report, page 37:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity implements a series of policies and programs that are in line with ESG practices. These policies are listed here:</p> <p><a href="https://www.arconic.com/governance-and-policies">https://www.arconic.com/governance-and-policies</a>  Arconic Environmental Management Policy:  <a href="https://www.arconic.com/global/en/who-we-are/pdf/Arconic-Environmental-Statement.pdf">https://www.arconic.com/global/en/who-we-are/pdf/Arconic-Environmental-Statement.pdf</a>  Arconic Environment, Health, and Safety Policy:  <a href="https://www.arconic.com/ehs-policies">https://www.arconic.com/ehs-policies</a></p> <p>Local implementation of corporate-level policies was reviewed at the in-scope Facilities. Further information about Arconic's Environmental, Social and Governance Policy and performance are available in the annual ESG Report:  <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity's senior management has endorsed the Environment, Health, and Safety (EHS) Policy which is regularly reviewed and supported through the provision of adequate resources. The Entity has an EHS Council, composed of staff from EHS and legal teams. The Council is a strategic body in the company which approves new initiatives. The Entity's corporate governance structure is disclosed in the 2021 ESG Report, page 35:  <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p> <p>At a local level, annual management reviews and regular reviews of the policies were evidenced at in-scope Facilities.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity effectively communicates its ESG Policies to internal and external Stakeholders. These policies are summarised at:  <a href="https://www.arconic.com/governance-and-policies">https://www.arconic.com/governance-and-policies</a></p> <p>The Arconic Environment, Health, and Safety Policy are available at:  <a href="https://www.arconic.com/global/en/who-we-are/pdf/Arconic-EHS-Policy.pdf">https://www.arconic.com/global/en/who-we-are/pdf/Arconic-EHS-Policy.pdf</a></p> <p>Communication of these policies is available in the local languages at in-scope Facilities.</p>
2.2 Leadership	Conformance	<p>The Entity's Vice President of EHS/ESG and Remediation has been nominated to ensure conformance to the ASI Performance Standard, reporting directly to the CEO. Further information on Arconic's corporate governance is available in the 2021 ESG Report, page 35:</p>

CRITERION	RATING	COMMENT
		<a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity's Management System at all Facilities, except Bohai, are ISO 14001 certified. The Bohai site complies with corporate principles/standards, and the review/assessment of the environmental and social management standards are completed periodically using the Entity's EHS1 ASAT tool (Arconic Self-Assessment Tool). The site uses the Entity's H&amp;S ASAT tools to complete periodic reviews on health and safety to ensure compliance.</p>
2.3b Environmental and Social Management Systems (social)	Minor Non-Conformance	<p>The Entity has developed a Social Management System, comprising procedures that define the implementation of the system, and records demonstrating the effective execution of the system. Internal audits are conducted regularly, with results stored in the Entity's ASAT tool or other location-specific depositories. However, there was no evidence that the Social Management System was planned, implemented, and reviewed for the Arconic Tennessee operations.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented a Responsible Sourcing Policy covering ESG issues. The Arconic Supplier Standards are available at: <a href="https://www.arconic.com/Supplier-Standards">https://www.arconic.com/Supplier-Standards</a></p> <p>The ESG aspects of responsible sourcing are managed centrally as many of the Entity's suppliers deliver goods to more than one location. This includes a supplier risk assessment and supplier Due Diligence questionnaire, associated training and mitigation measures for Aluminium and raw materials containing Aluminium for use in Aluminium Products. The results of the Global Supplier Sustainability program are outlined in the 2021 ESG Report (pages 39, 40 and 65), where aggregated supplier data is reported based on spending by region, purchasing categories, assessment results and ESG performance by topic area: <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>
2.5 Impact Assessments	Conformance	<p>The Entity's risk assessments are primarily conducted related to acquisitions, divestitures and significant investments and changes. The Entity has implemented procedures that define EHS assessment and risk management requirements in these cases. Environmental, social, cultural and Human Rights Impact Assessments, including gender analysis, are</p>



CRITERION	RATING	COMMENT
		undertaken as a part of mandatory reviews of project documentation and permitting requirements.
2.6 Emergency Response Plan	Conformance	The Entity's Facilities have either achieved ISO 14001 certification or operate equivalent Management Systems. The Entity operates internal procedures, standards and audit guidelines that address emergency prevention and response, aligned to the requirements of ISO 14001 and ISO 45001. These procedures have been informed by Stakeholder consultation including Workers and regulatory agencies.
2.7 Mergers and Acquisitions	Conformance	For any prospective merger or acquisition, a dedicated corporate team with specialist areas within the business are assigned to carry out a Due Diligence process, including ESG issues linked to the transaction. The EHS Standard defines the qualifications of the individuals conducting the EHS assessment (third-party or Arconic EHS staff). EHS checklists define additional requirements. Documents are stored on the EHS SharePoint.
2.8 Closure, Decommissioning and Divestment	Conformance	The Corporate Development team has overall responsibility for closure, decommissioning and divestment transactions, and assigns a member of the Environment, Health, and Safety (EHS) team to assess any Environment, Social and Governance (ESG) issues, including those defined in the EHS Standard. The EHS Standard defines the qualifications of the individuals conducting the EHS assessment (third party or Arconic EHS staff). ESG issues are assessed and included in documentation concerning any structural changes to the business as was evidenced by a recent divestment. More information on Arconic's ongoing remediation actions for the Grasse River project is available in the 2021 ESG Report, page 14: <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity's 2021 ESG Report is aligned with international reporting guidelines, including the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB) Metals & Mining Standard. In addition, the Entity provides an overview of its ESG performance in its Annual 10-K report, page 12. The Entity reports in accordance with the rulemaking of the US Securities and Exchange

CRITERION	RATING	COMMENT
		<p>Commission (SEC). Reports filed with the SEC are available at:  <a href="https://www.arconic.com/global/en/investors/annual-report.asp">https://www.arconic.com/global/en/investors/annual-report.asp</a> or on the SEC EDGAR website.            Arconic ESG information:  <a href="https://www.arconic.com/esg">https://www.arconic.com/esg</a>  <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a>  <a href="https://www.arconic.com/governance-and-policies">https://www.arconic.com/governance-and-policies</a>            CDP (carbon and water disclosure):  <a href="https://www.cdp.net/en/responses">https://www.cdp.net/en/responses</a>            UN Global Compact:  <a href="https://www.unglobalcompact.org/what-is-gc/participants/144551-Arconic-Corp">https://www.unglobalcompact.org/what-is-gc/participants/144551-Arconic-Corp</a></p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity's significant fines, judgments, penalties, and non-monetary sanctions are disclosed in the 2021 ESG Report, page 59:  <a href="https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf/8bf6c36b-2c29-82ec-3d3f-0348fac5db36?t=1660574172095&amp;download=false">https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf/8bf6c36b-2c29-82ec-3d3f-0348fac5db36?t=1660574172095&amp;download=false</a></p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity has implemented the required policies, procedures, training, and Due Diligence to ensure that payments made to governments are only on a legal/contractual basis. All payments to government authorities are recorded/carried out on the basis of a bank transfer and according to the Arconic Global Anti-Corruption Policy and corresponding procedures. Independent third-party audits of accounting statements are conducted regularly. For more information, see Arconic's annual 10-K disclosures:  <a href="https://www.arconic.com/sec-filings/?year=2022">https://www.arconic.com/sec-filings/?year=2022</a></p>
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity has implemented a procedure to address Stakeholder complaints and information requests. The procedure is available to Stakeholders around the world and protects the Stakeholder raising the complaint, if necessary. The Integrity Line is available at: <a href="https://www.arconic.com/integrity-line">https://www.arconic.com/integrity-line</a>            Arconic Kőfém has implemented the relevant requirements of its ISO 14001:2015 certified Management System.            Arconic Tennessee has documented each complaint/request in an email to the Community and Communications Manager and in the online 'Arconic Inquiry Management' Platform and followed up on time.</p>

CRITERION	RATING	COMMENT
		<p>Arconic Bohai has implemented the corporate principle of Stakeholder complaints, grievances, and requests for information. The Integrity Line is available and well-communicated to all Stakeholders (local numbers are provided on the website). External Stakeholders use the Integrity Line regarding employment and suppliers.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity, through its membership and active participation in recent studies with the U.S. Aluminum Association and European Aluminium Association, has evaluated the life cycle impacts of its major product lines shipped to its principal markets - automotive, building and packaging. For example, the Entity contributed to the Life Cycle Assessment (LCA) study 'The Environmental Footprint of Semi-Fabricated Aluminum Products in North America' published in 2022:  <a href="https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf">https://www.aluminum.org/sites/default/files/2022-01/2022_Semi-Fab_LCA_Report.pdf</a></p> <p>The Entity has also contributed to the study titled 'Life Cycle Assessment of On behalf of The Aluminum Association North American Aluminum Cans', available at:  <a href="https://www.aluminum.org/sites/default/files/2021-10/2021AluminumCanLCAReportFullVersion.pdf">https://www.aluminum.org/sites/default/files/2021-10/2021AluminumCanLCAReportFullVersion.pdf</a></p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>Upon request, the Entity guides customers to access the publicly available Life Cycle Assessment (LCA) reports on the North American and European Aluminium Association websites of their major product lines. These LCA's are cradle-to-gate with supplementary information covering other life cycle stages available on request. The Entity also provides specific primary data from its operations when requested by its customers to conduct their LCA study.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity contributes to industry LCA studies and communicates publicly on LCAs and Environmental Product Declarations (EDPs) which contain information on methodology, modelling, and system boundaries. It also produces product-specific data for a range of product lines. For example:  <a href="https://www.aluminum.org/sustainability-reports">https://www.aluminum.org/sustainability-reports</a>            (For US LCAs for various product groups)  <a href="https://european-aluminium.eu/resource-hub/environmental-profile-report-2018">https://european-aluminium.eu/resource-hub/environmental-profile-report-2018</a>            (For the entire Aluminium value chain EU)</p>

CRITERION	RATING	COMMENT
		<p><a href="https://www.kawneer.com/kawneer/north_america/en/info_page/product_transparency.asp">https://www.kawneer.com/kawneer/north_america/en/info_page/product_transparency.asp</a>  <a href="https://www.kawneer.com/kawneer/united_kingdom/en/info_page/aluminium_lifecycle.asp">https://www.kawneer.com/kawneer/united_kingdom/en/info_page/aluminium_lifecycle.asp</a>            (For US and Europe building materials LCA's)</p>
4.2 Product design	Conformance	<p>The Entity maintains a strong focus on improving the design of its products through its Centres of Excellence and the Arconic Technical Centre, focusing on three key areas, including operations, customers' sustainability, and supply chain. The Entity implements measures to drive supply chain sustainability in suppliers' processes and practices. This includes focusing on innovation and helping customers capture opportunities for product improvement as well as driving sustainable design through Arconic's Global Supplier Sustainability Program. For examples of product design that helps customers achieve their sustainability goals, see the 2021 ESG Report, 'Product' section, pages 15-18: <a href="https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf/8bf6c36b-2c29-82ec-3d3f-0348fac5db36?t=1660574172095&amp;download=false">https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf/8bf6c36b-2c29-82ec-3d3f-0348fac5db36?t=1660574172095&amp;download=false</a></p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity documents its scrap recycling goal including reducing internal scrap and targeting 100% recycling of Aluminium Process Scrap. The Entity assesses all sites against an internal standard. There is a specific target for each location that is reported weekly through the business quality teams and metal management teams. Facility-level Hoshin plans to establish annual targets and actions to reduce the scrap generated, which are approved at the business unit level. Any material that can't be consumed in-house is only sold externally (to another aluminium producer) after a multi-tier review/approval process.</p> <p>All scrap sources (scrap generation, monitoring, on-site process of scrap handling and selling procedures) are managed.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity separates Aluminium alloys and grades for recycling. In accordance with internal procedures, all wastes are separated along types of alloys and stored separately.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity has implemented a recycling strategy that is based on increasing scrap intake in the production process to replace Primary Aluminium used, based on the input of both Post-Consumer and Pre-</p>

CRITERION	RATING	COMMENT
		<p>Consumer Scrap. The recycling plans are site-specific and monitored by cross-functional teams. These include both the amount of externally purchased material that can be recycled into Arconic materials as well as targets for in-house revert/scrap. The Entity assesses all sites against an internal standard. The Entity also has closed-loop contracts with many of its customers that provide a path for them to return their Original Equipment Manufacturer (OEM) scrap to be recycled back into the parent alloy.</p>
<p>4.4b Collection and recycling of products at end-of-life (engagement)</p>	<p>Conformance</p>	<p>The Entity engages with the industry to support collaborations to increase Aluminium recycling rates. For instance, the Entity contributes to the Sustainability Advisory Council agenda for Aluminium Association. More information is available in the 2021 ESG Report, pages 15-18: <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p> <p>Arconic Tennessee works closely with the City of Maryville and Maryville College to help them further promote their recycling initiatives residentially and on-campus, respectively. Arconic Tennessee regularly encourages and contributes during locally sponsored events throughout the community.</p>
<p>PRINCIPLE 5 GREENHOUSE GAS EMISSIONS</p>		
<p>5.1 Disclosure of GHG emissions and energy use</p>	<p>Conformance</p>	<p>The Entity monitors their Greenhouse Gas (GHG) emissions at site-level and collects the data annually and reports at the corporate level. The Entity also reports its GHG emissions annually to the Carbon Disclosure Project (CDP) as well as government agencies where applicable. GHG emissions are disclosed in the 2021 ESG Report, pages 9-10: <a href="https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf">https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf</a></p>
<p>5.2 GHG emissions reductions</p>	<p>Conformance</p>	<p>At present, the Entity is updating its company-wide GHG emissions reduction target to align with the science-based approach and the Paris Agreement. As a member of the ASI and regional aluminium associations including the U.S. Aluminum Association and European Aluminium, the Entity is working on a pathway for the global industry to contribute to limiting global warming to below a 1.5°C threshold by 2050. In the interim, the Entity has established (in 2008) a strategic energy intensity target and initiatives to minimise energy use and, in turn, reduce GHG emissions. The target covers the Global Rolled Products (GRP) business unit. The target is a 30 per cent reduction in energy intensity by 2030 from a</p>

CRITERION	RATING	COMMENT
		<p>2005 baseline. As of 2021, the Entity has achieved a 29% reduction in energy intensity from its baseline. Further information is available in the 2021 ESG Report:</p> <p><a href="https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf/8bf6c36b-2c29-82ec-3d3f-0348fac5db36?t=1660574172095&amp;download=false">https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf/8bf6c36b-2c29-82ec-3d3f-0348fac5db36?t=1660574172095&amp;download=false</a></p> <p>The Entity also reports and discloses its energy and GHG efficiency targets in the CDP 2022 questionnaire, available at:</p> <p><a href="https://www.cdp.net">https://www.cdp.net</a></p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>The Entity's Annual Environment Action Plans include actions to minimise Emissions to Air as part of each site's continuous improvement plan.</p> <p>More information on the emissions to air performance per business segment is available in the 2021 ESG Report, page 50:</p> <p><a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>
6.2 Discharges to Water	Conformance	<p>The Entity has established a corporate internal water standard based on best practices. The Entity conducts internal audits that include a compliance component at a frequency determined by the identified risk level for the site.</p> <p>The methodology for determining the Entity's wastewater treatment and discharge is developed at the site level. The Entity quantifies and reports Discharges to Water (see 2021 ESG Report, pages 52-53), and reports to the CDP on water discharges. The Arconic Bohai site has two wastewater treatment stations as required by the approved Environmental Impact Assessment (EIA) report, in good operational order. The discharge status is monitored once a quarter and monitoring in Q4 2020 and Q1 2021 indicate the major pollutants meet the legal discharge limit.</p> <p>Arconic Köfém operates wastewater pre-treatment units for the process of wastewater onsite before the sewer discharge points. We observed there were no</p>

CRITERION	RATING	COMMENT
		<p>direct discharge points to aquatic environments. The site carries out daily monitoring of wastewater discharge points locally in its laboratory. The Facility demonstrated compliance with regulatory limits and reporting obligations, including groundwater measurements.</p> <p>Arconic Tennessee operates wastewater pre-treatment units for the process of wastewater onsite before the sewer discharge points. We observed there were no direct discharge points to aquatic environments. The site carries out daily monitoring of wastewater discharge points locally in its laboratory. The Facility demonstrated compliance with regulatory limits and reporting obligations, including groundwater measurements.</p> <p>Arconic Kitts Green works under IPCC permit and adheres to the Water Industries Act 1991 section 118 that relates to consent required for discharge of trade effluent to public sewer. The site maintains discharge consents under a sampling regime with the sewerage undertaker. All discharges are quantified with a meter or in a manner that is agreed upon by the sewerage undertaker.</p>
<p>6.3a Assessment and Management of Spills and Leakage (assessment)</p>	<p>Conformance</p>	<p>The Entity has not received any fines or had any legal claims for significant Spills and Leakage that may contaminate air, water and/or soil in the Facilities in scope. The Entity has conducted a risk assessment on the risk of Spills and Leakage at all sites. A detailed inventory has been developed to identify all the sumps, basements, trenches and pits and detailed action plans for higher risks are being progressed.</p> <p>Arconic Bohai has conducted a risk assessment for the environmental emergency covering the Spills and Leakage. The risk assessment report was registered with the local Environment Protection Bureau.</p> <p>Arconic Tennessee has an ISO 14001 certified Environmental Management System that identifies and periodically reviews all potential environmental risks. Risks are mitigated through procedures and work instructions in the ISO 14001 EMS.</p> <p>Arconic Kitts Green's Management System is certified to ISO 14001, Environmental aspects and risk assessment of Spills and Leakages are documented from the various plants and equipment around the site to the various emission points, whether it be to air, water, or soil. Control measures are documented on this sheet. Onsite, coolant and oil are the main risk areas. The site did not have significant spills or leakage in the past 3 years. Control measures include</p>

CRITERION	RATING	COMMENT
		regular checking of site bunding, detection and closure system on site drainage and routine inspection of tanks containing chemicals. Adequate training is provided to workshop Workers.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has implemented a standard to report on significant spills and major environmental incidents. An Emergency Preparedness and Response Plan procedure provides a template for communication with affected parties, such as communities and neighbours, should spills or releases occur. Arconic Köfém has implemented processes to prevent Spills and Leakage (e.g., secondary containment), implement emergency response plans, communicate with relevant authorities, and take remediation action as necessary. Regular drills with relevant authorities have been undertaken. Based on the risk assessment, the Arconic Bohai site includes containment facilities and has implemented established management procedures. The local Environmental Protection Bureau has approved the facilities. Training courses are provided to Workers and emergency response drills are conducted periodically.</p> <p>Arconic Tennessee has implemented processes to prevent Spills and Leakage (e.g., secondary containment), implement emergency response plans, communicate with relevant authorities, and take remediation action as necessary. Regular drills with relevant authorities have been undertaken. All environmental aspects are managed through the ISO 14001 certified EMS.</p> <p>Arconic Kitts Green has implemented processes to prevent Spills and Leakages in line with its ISO 14001 certified Management System, including control measures such as regular checking of site bunding, detection and closure system on site drainage and routine inspection of tanks containing chemicals. Adequate training is provided to workshop Workers.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>Spills over five gallons outside designated containment, including Spills defined as significant (over 500 gallons, not contained), are tracked and reported in the Entity's Incident Management System to assess if a regulatory deviation occurred. Spills that meet certain thresholds are also reported to appropriate agencies and spill response teams. Communication procedures are established to inform affected parties, such as Communities, neighbours, emergency response teams and regulators.</p>



CRITERION	RATING	COMMENT
6.4b Reporting of Spills (regular reporting)	Conformance	<p>Arconic had zero environmentally significant Spills in 2021. Arconic defines a significant spill as one that exceeds 1,893 litres (500 gallons). Significant spills are listed in the 2021 ESG Report, pages 13 and 59:</p> <p><a href="https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf">https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf</a></p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has implemented a waste management standard that outlines the Waste Mitigation Hierarchy. All sites have implemented programs to reduce, reuse, and/ or recycle their waste to minimise the amount of waste requiring disposal as well as to comply with applicable rules and restrictions. All sites report Hazardous and Non-Hazardous Waste quantities to relevant authorities regularly. The Entity has a corporate-level goal to achieve zero-waste landfill by 2030 and the waste management standard sets out the requirements that each location is expected to meet.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>Waste data are outlined in the ESG Report (pages 53-58) including Hazardous and Non-Hazardous Waste with breakdown by type and disposal method, by business unit, and by recovery operations:</p> <p><a href="https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf">https://www.arconic.com/documents/42106/101796/Arconic-ESG-Report-2021.pdf</a></p> <p>Arconic Köfém discloses the type, volume, and associated waste disposal methods of Hazardous and Non-Hazardous Waste to the relevant authorities via an online platform quarterly. The site also conducts regular second-party audits of its Hazardous Waste contractors, including the transportation of waste. Arconic Bohai registers its solid waste generated in its operation with the government website for solid waste management, including a management plan, transferring for disposal and the relevant suppliers (disposal suppliers and transportation suppliers). Arconic Tennessee completes an annual report for the State of Tennessee - Department of Environment regarding all information on the solid waste generated in its operation including a management plan, transferring for disposal and the relevant suppliers. Arconic Kitts Green discloses Hazardous Waste by type and disposal method quarterly to the Environmental Agency via its National Operator Waste Returns sheet, approved by the EHS Manager. The site also reports the quantities of Hazardous and Non-Hazardous waste via corporate reporting tools.</p>

CRITERION	RATING	COMMENT
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope
6.8a Dross (recovery)	Conformance	<p>The Entity has multiple in-house and external Dross processing paths globally. Some locations process their Dross in a rotary Dross furnace or mechanical separation cell and reuse the Aluminium back in the process. Others send the Dross to an external processor to convert the Dross to Aluminium and receive it back for consumption. Each Casthouse location has a Dross recovery/melt loss target. Arconic Corporate functions work with external processors to ensure the recovery of the Aluminium is maximised, which includes audits of the secondaries, sending material to multiple secondaries for a comparative benchmark, and metallic testing at external labs to confirm that they are maximising the recovered Aluminium. More information is available in the 2021 ESG Report, Waste Management section, pages 12 -13: <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>

CRITERION	RATING	COMMENT
		Arconic Kitts Green does not landfill any Dross. Dross is sent off to an external processor, Tandom Recycler in Cheshire ( <a href="https://tandom.co.uk/sustainability">https://tandom.co.uk/sustainability</a> ) in the UK which operates a rotary Dross furnace to recover Aluminium. The salt cake/salt slag residues from this process and then shipped to another processor for further recovery operation (sent to Befesa in Germany for further processing).
6.8b Dross (recycling)	Conformance	The Entity has in-house groups responsible for working with external processors to ensure the recovery of Aluminium is maximised, and includes audits of the secondaries, sending material to multiple secondaries for a comparative benchmark, and metallic testing at external labs to confirm that they are maximising the recovered Aluminium.
6.8c Dross (review of alternatives)	Conformance	No Dross residues are sent to landfill as verified during the site visits to the Köfém and Bohai sites. 100% of Slag is sent to third parties for further processing. Arconic Tennessee periodically reviews their Dross residue management to minimise salt cake disposed to landfill by third parties and identify improvement projects. Arconic Kitts Green does not recycle Dross on site, it sends all its Dross to an external recycling processor and the Salt Slag is sent to Germany for further processing.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has evaluated the Facilities to determine whether locations are in a stressed area or under water restrictions, using the Global Water Tool developed by the World Business Council for Sustainable Development. The Entity has developed a companywide EHS standard related to water and wastewater management which requires sites to identify, quantify, and prepare a comprehensive inventory of water sources and impacts on the Watershed. Each in-scope Facility has conducted a water balance analysis and regularly reports on water withdrawal and sources to the Arconic Corporate Centre. For more information see the 2021 ESG Report, page 11: <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a>
7.1b Water assessment (risk assessment)	Conformance	The Entity has evaluated whether sites are in a water-stressed area or underwater withdrawal restrictions. The Entity has developed a companywide EHS

CRITERION	RATING	COMMENT
		<p>standard related to water and wastewater management which requires sites to identify, quantify, and prepare a comprehensive inventory of water sources and impacts on the Watershed. For more information see the 2021 ESG Report, page 11:  <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>
7.2a Water management (management plans)	Conformance	<p>The Entity has implemented its water management standard, which requires compliance with sustainability metrics for water management related items. The Entity has also developed long-term environmental footprint reduction targets including the overall reduction of process water by 15% by 2030. The Entity discloses water withdrawal, water consumption and water discharge data in their annual ESG Report (see page 52). Additionally, some sites also hold forums with the surrounding community to discuss progress towards their water sustainability efforts, among other environmental-related topics. The Entity also completes the CDP Water Security questionnaire annually.</p> <p>Arconic Köfém, in line with corporate targets, is setting plans to reduce water consumption by 20% by 2030.</p> <p>The Bohai site has established a target for a water consumption reduction of 1.88MT per tonne of product in 2021. The associated management program is established. The achievement status of the target is reviewed periodically.</p> <p>Arconic Tennessee developed water balance flow charts for its plants to assess water usage and discharge throughout each facet of the production process. This aligns with the Arconic corporate initiative to reduce the amount of water usage by 20% by 2030, based on the metrics established in 2016.</p>
7.2b Water management (monitoring)	Conformance	<p>The Entity has monitored progress against its water reduction target. Arconic Corporation, which includes the Entity as one of three business segments, withdrew 8.08 million cubic meters (2.13 billion gallons) of water in 2021, which was a 2.9 per cent increase over 2020, attributed to production growth. The water intensity decreased by 15% in 2021 through water use efficiency and recycling initiatives. For more information see the 2021 ESG Report, page 11:  <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity has reported its water withdrawal sources and use, and material water-related risks in the 2021 ESG Report:  <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p> <p>The Entity also discloses water-related risks to the Carbon Disclosure Project (CDP):  <a href="https://www.cdp.net/en/responses/64106">https://www.cdp.net/en/responses/64106</a></p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity has assessed the risk and materiality of the impacts on biodiversity from the land use and activities in its Areas of Influence using the Integrated Biodiversity Assessment Tool (IBAT). Based on the IBAT assessment, there are no material impacts on biodiversity.</p> <p>All significant environmental aspects are managed under the ISO 14001:2015 certified Environmental Management Systems at the Köfém, Kitts Green and Tennessee sites.</p>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as biodiversity risks and potential impacts identified were assessed and documented as low.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the biodiversity risks and potential impacts identified are assessed and documented as low.
8.2c Biodiversity management (reporting)	Not Applicable	<p>This Criterion is not applicable as the biodiversity risks and potential impacts identified were assessed and documented as low. However, the Entity discloses its environmental compliance approach which covers biodiversity impacts in the 2021 ESG Report, Appendix B – Sustainability Accounting Standards Board Index, page 47:  <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>
8.3 Alien Species	Conformance	<p>The Entity has established special requirements at the site level for wood materials that come from quarantine areas. The materials supplier carries out checks and treatment if necessary and sends documented results of the treatment. All quarantined products entering the plant are checked for the appropriate certificates.</p> <p>For Arconic Bohai, as per the biodiversity risk assessment report, the only source that could introduce Alien Species is the pallets used for the product package. All pallets are fumigated before use to prevent the introduction of Alien Species as per the requirements of China Customhouse.</p>

CRITERION	RATING	COMMENT
		At Arconic Tennessee, there is no potential impact or opportunity for Alien Species presence due to the management of the incoming pig and scrap metal, transport, and logistical operations of the plant. Arconic Kitts Green has assessed the risk of introducing Alien Species as part of its Biodiversity Risk Assessment, and the impacts were considered low. Goods are inspected upon arrival, the bulk of which is prime metal that does not hold a medium (such as water, or organic matter) that can carry organisms. Wooden materials used in transit (i.e., pallets and crates) have also been considered.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
<b>PRINCIPLE 9 HUMAN RIGHTS</b>		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has a Human Rights Policy expressing a commitment to respect Human Rights. The Policy refers to the UN Guiding Principles on Business and Human Rights. The Policy and Code of Conduct are available at: <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a> <a href="https://www.arconic.com/code-of-conduct">https://www.arconic.com/code-of-conduct</a> This Policy is part of employee training during onboarding and annual re-calibration training.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity has defined Due Diligence processes including the supply chain sustainability programme, ethics, and compliance due diligence programme, and the ‘Arconic Generic Statement Regarding Uyghur Forced Labor Prevention Act’. However, there was no up-to-date Human Rights risk assessment available across Arconic Group operations that identified salient Human Rights risks and Rightsholders.
9.1c Human Rights Due Diligence (remediation)	Conformance	There were no identified cases or contributions to adverse Human Rights impacts at the Entity’s Facilities. However, the Arconic Massena site,

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		<p>currently outside the Entity's Certification Scope, has continued its Grasse River remediation. Under the oversight of the United States Environmental Protection Agency (US EPA), Arconic continued to deliver its Grasse River legacy environmental clean-up project in upstate New York which involved dredging, capping, and habitat reconstruction along a seven-mile section of the river that was historically impacted by polychlorinated biphenyls (PCBs). For further information see the 2021 ESG Report: <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>
9.2 Women's Rights	Conformance	<p>The Entity has implemented a Human Rights Policy that addresses equal opportunity, Discrimination and Harassment. The Entity has many programs for women's empowerment such as Girl Scouts, the New York Academy for Sciences, the Society for Women Engineers, the Manufacturing Institute, Women in Manufacturing, and the American Association of University Women (AAUW).</p> <p>The Entity has participated in the Target Gender Equality Accelerator initiative through the UN Global Compact and supports the UN's Women's Empowerment Principles (see 2021 ESG Report, page 26). The 2021 ESG Report outlines women's representation across all employees, senior management, and executive level (see page 25). The Entity's diversity and inclusion data can be found in the 2021 ESG Report, Appendix C: <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>
9.3 Indigenous Peoples	Conformance	<p>There are no Indigenous Peoples present at the Entity's in-scope Facilities. The Entity has implemented corporate policies and procedures to respect the rights and interests of Indigenous Peoples.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	<p>There are no Indigenous Peoples in the area of activity or influence of in-scope Facilities. The Entity has developed corporate-level policies to consult with Indigenous Peoples as required by Applicable Law.</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has conducted impact assessments on sacred or cultural heritage sites to meet permit requirements to gain permission to operate. At Arconic Tennessee, an ancient cemetery (not an Indigenous site) has been identified and is located on the property in the area of Arconic City. The site protection area has been implemented and is kept clean by the Entity.</p>

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity has developed a corporate standard to consider feasible alternatives to avoid or minimise physical and economic displacement in project designs, including resettlements.</p> <p>There are no Resettlements or Resettlement plans since the Entity joined ASI. There have been no projects implemented that caused displacement, resettlement, or land acquisition.</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>The Entity has developed a corporate standard to consider feasible alternatives to avoid or minimise physical and economic displacement in project designs, including resettlements.</p> <p>There are no Resettlements or Resettlement plans since the Entity joined ASI. There have been no projects implemented that caused displacement, resettlement, or land acquisition.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>In 2021, Arconic solicited Stakeholder participation and feedback for the 2021 Materiality Assessment to understand which ESG topics are most important to the business from their perspective. Through the Arconic Foundation, projects that provide a positive impact on the communities are initiated:  <a href="https://www.arconic.com/foundation">https://www.arconic.com/foundation</a></p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity is active in community engagement at all their sites and the corporate level and takes appropriate steps to explore opportunities with Local Communities and to prevent adverse impacts on Local Community livelihoods. For community engagement, and as key external Stakeholders, the Entity has requested the engagement of Local Communities in their online, voluntary materiality assessment, see ESG 2021 Report, page 7:  <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity is active in community engagement at all sites and at a corporate level. Employees volunteer their time and skills to community programs and projects to help local non-profit organisations. Through the Arconic Foundation, the Entity initiates projects with a positive impact on the Communities:  <a href="https://www.arconic.com/foundation">https://www.arconic.com/foundation</a></p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity is committed to not contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-risk Areas (CAHRAs) through the Arconic Human Rights Policy. The Entity conducts Due Diligence to identify and prevent Human Rights risks to people in the Entity's operations and supply chain.</p>



CRITERION	RATING	COMMENT
		<p>Should any adverse Human Rights impact be identified as having resulted from or caused by its business activities, the Entity is committed to remediation fairly and equitably:  <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a></p> <p>The Entity has implemented the Arconic Conflict Minerals Policy to respect, protect, and promote fundamental Human Rights consistent with their values in our operations and supply chain in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidelines for responsible mineral sourcing. The Entity complies with the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, as implemented by the U.S. Securities &amp; Exchange Commission (SEC)'s Conflict Minerals Rule and the EU Conflict Minerals law.</p> <p>Conflict Mineral Policy:  <a href="https://www.arconic.com/global/en/investors/pdf/Conflict-Minerals-Policy-FINAL-External.pdf">https://www.arconic.com/global/en/investors/pdf/Conflict-Minerals-Policy-FINAL-External.pdf</a></p> <p>Code of Conduct:  <a href="https://www.arconic.com/code-of-conduct">https://www.arconic.com/code-of-conduct</a></p>
9.9 Security practice	Conformance	<p>The Entity contracts its security services and has contractual requirements preventing the hire of security companies or Contractors that are credibly implicated in the infringement of Human Rights. Local Contractors are used at sites to safeguard human, intellectual, financial, and physical assets. The suppliers are committed to all the Entity's rules and principles.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The Entity has implemented the Arconic Human Rights Policy that addresses the Freedom of Association and the Right to Collective Bargaining. The Entity's sites have Labour Unions or Workers' councils operating on site. The Union Collective Bargaining Agreement further addresses the right to Freedom of Association.  <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a></p> <p>Some laws restrict Freedom of Association in China. However, the Arconic Bohai site demonstrates respect for the right to Freedom of Association and Collective Bargaining. The site commits itself to respecting the Workers' rights. A Labour Union is comprised of forty-eight committee members including eight women.</p>

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The Entity has a Union Collective Bargaining Agreement that addresses the right to Collective Bargaining. The Agreement is negotiated at the site level.</p> <p>At Arconic Bohai, the Collective Bargaining Agreement is negotiated at the site level. The records of negotiations between the Entity and the Labour Union, including meeting minutes and employee Collective Bargaining agreements are maintained.</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	<p>In China some laws restrict Freedom of Association, however, Arconic Bohai demonstrates respect for the right to Freedom of Association and Collective Bargaining. The site commits itself to respecting Workers' rights.</p>
10.2a Child Labour (minimum age)	Conformance	<p>The Entity has implemented the Arconic Human Rights Policy that addresses Child Labour: <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a></p> <p>The Policy is part of the Code of Conduct. Employee training on the Policy is delivered during onboarding and annual re-calibration training. The Entity does not use nor support the use of Child Labour.</p>
10.2b Child Labour (hazardous)	Conformance	<p>The minimum age for employment is 18 years. The Entity's Human Rights Policy addresses Child Labour: <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a></p> <p>The Entity does neither use nor support the use of Child Labour as defined in ILO Conventions C138 and C182 and complies with related national and international law. The Entity does not engage in or support the use of Hazardous Child Labour, as verified by a review of employee records, Worker interviews, and compliance reviews against local law requirements.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Entity has implemented a Human Rights Policy that addresses Child Labour: <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a></p> <p>The Entity requires its suppliers to respect all laws in their jurisdiction regarding Child Labour, as stipulated by the Arconic Supplier Standards, available at: <a href="https://www.arconic.com/supplier-standards">https://www.arconic.com/supplier-standards</a></p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity has implemented a Human Rights Policy that addresses Forced Labour: <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a></p> <p>The Policy is part of the Code of Conduct. Employee training on the Policy is delivered during onboarding and annual re-calibration training.</p>

CRITERION	RATING	COMMENT
		The Entity does not engage in nor support Human Trafficking via direct employment or employment through labour agencies. The Entity has implemented controls and processes to monitor employment terms and conditions via labour agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented a Human Rights Policy that addresses Forced Labour: <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a> The Entity's standard employment contract doesn't stipulate any forms of fee for hiring, payments for provided equipment, special provisions for Migrant Workers, forced work as payment of debts, or unreasonable restrictions on Workers' movement. This was evidenced via Worker interviews and interviews with Contractors on site.
10.3c Forced Labour (migrant workers)	Conformance	The Entity's Human Rights Policy addresses Forced Labour and is available at: <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a> The Entity does not require Migrant Workers to lodge deposits as evidenced in workers' interviews and payroll reviews.
10.3d Forced Labour (debt bondage)	Conformance	The Entity's Human Rights Policy addresses Forced Labour and is available at: <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a> The Entity does not hold Workers in Debt Bondage nor forces them to work off debts. This was evidenced in the review of policies, procedures, employment contracts, payroll information and worker interviews with employees and Contractors.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity's Human Rights Policy addresses Forced Labour and is available at: <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a> The standard employment contracts do not stipulate any forms of fee for hiring, employee payments for provided equipment, special provisions for Migrant Workers, forced work as payment of debts, or unreasonable restrictions on Workers' movement. Worker interviews confirmed that the Entity does not unreasonably restrict the freedom of movement of Workers.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not withhold Workers' original documents. The Entity's Human Rights Policy addresses Forced Labour and is available at: <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a>

CRITERION	RATING	COMMENT
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length. The notice period varies based on the site location. Employment Contract templates have the required language on the freedom to terminate. These processes were verified during a review of employee records, employment contracts and worker interviews.</p> <p>The Entity's Human Rights Policy addresses Forced Labour:  <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a></p>
10.4 Non-Discrimination	Conformance	<p>The Entity's Human Rights Policy addresses equal opportunity and zero tolerance for Discrimination or harassment and is available at:  <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a></p> <p>The Policy is part of the Entity's Code of Conduct. Employee training on the Policy is delivered during onboarding and annual re-calibration training. For more information, refer to the 2021 ESG Report, Diversity Equity &amp; Inclusion section, pages 25-27:  <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p> <p>The implementation of the Entity's Non-Discrimination Policy was verified via a review of training records, worker interviews, a review of applicable procedures and processes (e.g., the hiring process), as well as a review of payroll records.</p>
10.5 Communication and engagement	Conformance	<p>The Entity maintains open communication and direct engagement with Workers without threat of reprisal, intimidation, or harassment. This was evidenced via interviews with Trade Union local representatives and worker interviews.</p> <p>The Entity operates an Integrity Line which is available to Workers to seek advice or report grievances confidentially. The Entity discloses Integrity Line reports as a key performance indicator in the 2021 ESG Report, page 38:  <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a></p>
10.6 Disciplinary practices	Conformance	<p>The Entity has established written procedures for disciplinary actions including verbal warnings, written warnings, demotion, process change, performance improvement plans, training/coaching, reduction in pay or bonus, reassignment, suspension with pay, suspension without pay, or termination.</p> <p>The Entity does not engage in nor tolerate any other forms of disciplinary practices as evidenced through its commitment to respect Human Rights as documented in the Human Rights Policy as well as</p>

CRITERION	RATING	COMMENT
		<p>through worker interviews and review of local Collective Bargaining agreements:  <a href="https://www.arconic.com/human-rights">https://www.arconic.com/human-rights</a></p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity ensures Remuneration is competitive, complies with Collective Bargaining Agreements, complies with minimum legal wage requirements and there is no Discrimination in compensation. The Entity provides compensation that is competitive within the relevant labour market. The Entity's compensation approach encompasses base pay, variable pay, and appropriate benefits that meet or exceed legal minimums and are compliant with all Applicable Laws. The structure is designed to deliver median compensation within a specific labour market, with higher compensation awarded for superior individual or team performance.</p>
10.7b Remuneration (method of payment)	Conformance	<p>The Entity has implemented a payment system with direct payment via bank transfer at all sites. Annual self-assessments are required by each Facility and completed against the Entity's payroll requirements. Depending on the risk, every one to five years, payroll practices are reviewed at the request of the Audit Committee of the Board and conducted by the internal audit function.</p>
10.8 Working Time	Minor Non-Conformance	<p>Each Facility meets the country, Collective Bargaining Agreement or site-based work hours and Overtime Policies. Every one to five years, each of the Entity's sites and financial processes are audited by the Entity's internal audit department. However, excessive Overtime was identified for a small number of employees at Arconic Kitts during the 2022 accounting year, going beyond the Overtime hours agreed within the local Collective Bargaining Agreement. Arconic Kitts Green has investigated the findings following the Audit and will implement further controls and checks to ensure the mandated off days are taken by employees within a seven and 14-day period according to the Collective Agreement.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has implemented and maintained an Occupational Health and Safety Policy (OH&amp;S) supported by senior management:  <a href="https://www.arconic.com/documents/42106/101790/Arconic-HS-Statement.pdf/d436efe8-88b1-e945-4d4a-ed5c2094f1f9?t=1660574289890&amp;download=false">https://www.arconic.com/documents/42106/101790/Arconic-HS-Statement.pdf/d436efe8-88b1-e945-4d4a-ed5c2094f1f9?t=1660574289890&amp;download=false</a></p>

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's OH&S Policy is applied to all Workers and Visitors present in any area or activities under the Entity's control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's OH&S Policy includes a commitment to comply with Applicable Laws on Workers' Health and Safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity's policies provide Workers with the ability to identify hazards and safe practices for their work, and the authority to refuse or stop unsafe work. For more information see the 2021 ESG Report, Arconic's Health and Safety Management System, pages 26-27: <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a>
11.2 OH&S Management System	Conformance	The Entity has documented an Occupational Health and Safety Management System that complies with applicable national and international standards.
11.3 Employee engagement on health and safety	Conformance	The Entity's Workers are provided with effective mechanisms to raise, discuss, and participate in the resolution of any OH&S issues with management such as joint health and safety committees, and orientations of new employees.
11.4 OH&S performance	Conformance	The Entity maintains a daily monitoring dashboard with DART (Days Away Restricted Time and Transfer) and TRR (Total Recordable Rate) indicators calculated weekly. The metrics use the standard industrial codes for benchmarking against the industry average, linked to extrusion, smelting, Aluminium manufacturing and metal window and door manufacturing. Health and Safety key performance indicators for the Arconic group are outlined in the ESG 2021 Report, pages 29 and 63: <a href="https://www.arconic.com/sustainability-report">https://www.arconic.com/sustainability-report</a>

## **Document Control and Version History**

Revision	Date	Notes
0	20 December 2019	Issued (Full Certification)
1	20 February 2020	Updated for Certification Scope change (addition of Hungary and Brazil sites).
2	27 January 2021	Updated for Certification Scope change (addition of China site and removal of Arconic Itapissuma) and corrections made to the details of the First Scope Change Audit.
3	12 January 2022	Surveillance Audit
4	22 February 2023	Re-Certification Audit and Scope Change – Full Certification. Updated Certification Scope for the addition of the Tennessee, USA facility and removal of Samara, which was transferred to a single-site Certification (#250).
5	31 August 2023	Update for Certification Scope Change for the addition of the Kitts Green Operations located in the UK.
6	22 August 2024	Surveillance Audit