
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALCOA PORTLAND ALUMINIUM

CERTIFICATE
NUMBER

273

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

17 APRIL 2023

DATE OF EXPIRY

16 APRIL 2026

CERTIFIED SINCE

17 APRIL 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at*

www.aluminium-stewardship.org

CERTIFICATION SCOPE

The Alcoa Portland aluminium smelter in south-western Victoria, Australia. Facilities and activities include aluminium smelting, casthouse and administration.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

| | |
|-------------------------|--|
| MEMBER NAME | Alcoa Corporation |
| ENTITY NAME | Alcoa Portland Aluminium |
| CERTIFICATION SCOPE | The Alcoa Portland aluminium smelter in south-western Victoria, Australia. Facilities and activities include aluminium smelting, casthouse and administration. |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none">Aluminium SmeltingCasthouses |
| ASI STANDARD | <ul style="list-style-type: none">Performance Standard V2 |
| AUDIT TYPE | <ul style="list-style-type: none">Initial Certification Audit (14 – 17 November 2022)Surveillance Audit (7 – 14 October 2024) |
| AUDIT FIRM | DNV Business Assurance Services UK Ltd. |
| AUDIT DATE | <ul style="list-style-type: none">14 – 17 November 2022 (Initial Certification Audit)7 – 14 October 2024 (Surveillance Audit) |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">14 March 2023 (Initial Certification Audit)25 November 2024 (Surveillance Audit) |
| AUDIT SCOPE | <p><u>Initial Certification Audit (14 – 17 November 2022)</u></p> <p>The Audit Scope includes the Alcoa Portland Aluminium smelter in south-western Victoria, Australia. Facilities include Aluminium smelting, casthouse and administrative associated facilities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p> |

Surveillance Audit (7 – 14 October 2024)

The Audit Scope includes the Alcoa Portland Aluminium smelter in south-western Victoria, Australia. Facilities include Aluminium smelting, casthouse and administrative associated facilities.

Supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Casthouses

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

17 April 2023 – 16 April 2026

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

16 April 2026

CERTIFICATE
NUMBER

273

SUMMARY OF FINDINGS

| CRITERION | RATING | COMMENT |
|--|-------------|---|
| PRINCIPLE 1 BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | The Entity has implemented the appropriate systems required to maintain awareness, ensure compliance with Applicable Laws, and maintain a context-sensitive commitment to customary and/or traditional practices. |
| 1.2 Anti-Corruption | Conformance | <p>The Gifts and Entertainment Policy is outlined in the facility's Code of Conduct: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct and reinforces the Entity's commitment to ethical practices. Alcoa Corporate also has an exclusive Policy on Anti-Corruption at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption#:~:text=Gifts%20and%20Hospitality.&text=reasonable%20in%20value%20and%20appropriate,permitted%20under%20applicable%20law%3B%20and</p> <p>As part of the Entity's Policy, all employees undergo annual anti-Corruption training. Additionally, the Entity has an Integrity Line, available to internal and external Stakeholders, to report any concerns related to ethics or compliance. Contractors also receive anti-Corruption training, typically through their own companies, to ensure that third-party partners align with the Entity's ethical standards.</p> |
| 1.3 Code of Conduct | Conformance | <p>All Australian sites, including the Entity strictly follow Alcoa's standardised global Policy, available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p> <p>The Code of Conduct is introduced to all new employees during their induction and is incorporated into the annual mandatory training program.</p> |
| PRINCIPLE 2 POLICY & MANAGEMENT | | |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | <p>The latest EHS policy (updated in June 2024) is available at: https://www.alcoa.com/australia/en/pdf/portland-aluminium-environment-health-and-safety-policy.pdf</p> <p>Alcoa's Social Policy is also disclosed in its website at: https://www.alcoa.com/sustainability#Policies</p> |
| 2.1b Environmental, Social, and Governance Policy (senior management) | Conformance | The EHS Policy is endorsed by the Plant Manager with the support of other senior managers. Checks and balances are ensured through regular conduct of both corporate and internal audits (ASAT). |

| CRITERION | RATING | COMMENT |
|---|-------------|---|
| 2.1c Environmental, Social, and Governance Policy (communication) | Conformance | The Entity communicates its EHS Policy to employees, Contractors, and other Stakeholders through various means such as training, document control systems, and by displaying copies in prominent locations. The Policy is also available upon request to interested parties and is communicated through mandatory training with assessments among employees and Contractors. The EHS policy is also available on the website: https://www.alcoa.com/australia/en/pdf/portland-aluminium-environment-health-and-safety-policy.pdf |
| 2.2 Leadership | Conformance | The Entity has nominated the Senior Community and Corporate Affairs advisor as having overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard. |
| 2.3a Environmental and Social Management Systems (environmental) | Conformance | The Entity has documented and implemented integrated Environmental and Social Management Systems and is ISO 14001:2015 certified. |
| 2.3b Environmental and Social Management Systems (social) | Conformance | The Entity has documented, implemented, and maintained a Social Management System. The Entity is following Alcoa's new Social Performance Management Standard and System which includes four standards (Social Performance Management Standard, Cultural Heritage Standard, Indigenous Peoples Standard and Human Rights Policy). |
| 2.4 Responsible Sourcing | Conformance | Alcoa's Responsible Sourcing Policy and guidelines are published at: https://www.alcoa.com/global/en/contact/supplier/responsible-sourcing-program/#:~:text=Our%20Responsible%20Sourcing%20program%20is,and%20services%20that%20we%20procure The Policy was last updated in 2024 and will be updated again in 2025 to align with the EU Corporate Sustainability Due Diligence Directive (CSDDD). Signed by the Vice President of Sustainability, this Policy includes supplier standards focused on responsible sourcing, with strict prohibitions on Child Labour, 'bonded' (Forced) Labour, and related practices. Alcoa also maintains a Modern Slavery Statement to reinforce its ethical labour commitments. Alcoa incorporates OECD Due Diligence Guidelines into its Responsible Sourcing practices, using a scoring methodology aligned with these standards. This approach is detailed in the Responsible Sourcing Overview. |
| 2.5 Impact Assessments | Conformance | The Entity consistently conducts Environmental, Social, Cultural and Human Rights Impact Assessments, |

| CRITERION | RATING | COMMENT |
|--|-------------|--|
| | | including a gender analysis, for New Projects or Major Changes to existing Facilities. Aside from minor capital improvements like the re-instatement of a potline section, the Entity has made no changes in its operations for several years. Internal procedures are in place to ensure environmental and social risk assessments relating to any New Projects or Major Changes to existing Facilities are undertaken. |
| 2.6 Emergency Response Plan | Conformance | The Entity has a site-specific Emergency Response Plan developed in consultation with the community. It provides clear and concise guidelines for the preparedness for and response to emergencies that may occur. Workers are provided training and undertake drills on emergency response periodically, focussing on high-risk areas. |
| 2.7 Mergers and Acquisitions | Conformance | The Entity reviews all environmental, social, and governance issues in the corporate Due Diligence process as prescribed by its parent company for mergers and acquisitions. |
| 2.8 Closure, Decommissioning and Divestment | Conformance | The Entity reviews all environmental, social and governance issues in the planning process for any closure, decommissioning and divestment within their Facilities. |
| PRINCIPLE 3 TRANSPARENCY | | |
| 3.1 Sustainability Reporting | Conformance | The Entity publicly discloses its governance approach and its Material environmental, social and economic impacts in the published Annual and Sustainability Reports of the Entity's parent company Alcoa. The 2023 Sustainability Report is available at: https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf |
| 3.2 Non-compliance and liabilities | Conformance | The Entity has disclosed its environmental non-compliance (including significant fines and penalties) in the Alcoa 2023 Sustainability Report, available at: https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf The Entity works with environmental agencies, and external Stakeholders to identify the root cause of the non-compliances and find solutions to address them as soon as possible. The Entity uses an environmental compliance and tracking system to identify issues, monitor progress towards targets and verify that actions are effective. |
| 3.3a Payments to governments (legal and contractual) | Conformance | The Entity has established a framework to ensure all relevant customs fees and legal payments are made to the government. Payments to all government agencies |

| CRITERION | RATING | COMMENT |
|--|----------------|--|
| | | and officials are covered by corporate Policies and monitored by an external solutions provider. |
| 3.3b Payments to governments (disclosure – bauxite mining) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.4 Stakeholder complaints, grievances, and requests for information | Conformance | Community complaints and grievances are recorded and managed through the Entity's Community Consultation System. When necessary, information on community complaints and grievances are reported to the Entity's Lead Team through the site lead team or other channels. The Entity also has regular meetings across departments to address environmental, health and safety related grievances and issues, with the aim of finding solutions. The Entity is equipped with an Integrity Line for each country of operation. Access to the hotline is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line |
| PRINCIPLE 4 MATERIAL STEWARDSHIP | | |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts) | Conformance | The Entity has completed its Life Cycle Assessment (LCA) through third party experts. The LCA performed conforms to ISO 14044. Site specific aspect and impact analyses are performed as required under ISO 14001:2015 and are available at the site level. |
| 4.1b Environmental Life Cycle Assessment (cradle to gate) | Conformance | The Entity has completed its Life Cycle Assessment (LCA) through third party experts. The LCA performed conforms to ISO 14044. Site specific aspect and impact analyses are performed as required under ISO 14001:2015 and are available at the site level. |
| 4.1c Environmental Life Cycle Assessment (public communication) | Conformance | Customers and other Stakeholders may access IAI-LCA publications and additionally, the Alcoa website (www.alcoa.com/sustana) informs customers on the availability of the Environmental Product Declarations (EPDs) for EcoLum Primary Aluminium products and carbon footprint certificates for EcoSource Alumina products, encouraging customers to request this information. The EPDs are also available online through the UL E website Main App - SPOT at: www.ul.com |
| 4.2 Product design | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 4.3a Aluminium Process Scrap (targets) | Conformance | The processes/work instructions are designed to ensure that all Aluminium, including the Aluminium contained in Dross is recovered and remelted, maximising resource efficiency and reducing waste. These processes and associated work instructions pertain to daily management |

| CRITERION | RATING | COMMENT |
|---|-------------|--|
| | | and Scrap tracking systems and monitoring and actioning of equipment reliability to minimise Scrap generation. |
| 4.3b Aluminium Process Scrap (alloy separation) | Conformance | The Entity has established strict safeguards to limit external Aluminium scrap from entering the plant. All Aluminium Process Scrap that are being recycled are generated internally. |
| 4.4a Collection and recycling of products at end-of-life (strategy) | Conformance | The Entity has implemented strategies to advance recycling activities with specific targets and timelines. At a corporate level, Alcoa encourages End of Life recycling through global recycling activities since they have very little influence on 'End of Life' consumer scrap as all their Facilities are very far from end consumers of Aluminium. The Entity has implemented a patented technology to purify low-value automotive scrap to encourage more intensified recycling and more efficient use of energy. |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance | The Entity's smelting and Casthouse operations are all Primary Casthouses, positioned far upstream from end consumers. As a result, it does not have any direct influence over the management of Scrap material at the end of the product lifecycle. |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS | | |
| 5.1 Disclosure of GHG emissions and energy use | Conformance | <p>The Entity is legally required to report its annual Greenhouse Gas (GHG) emissions through the National Emissions and Energy Reporting System (EERS) platform in accordance to the National Greenhouse and Energy Reporting (NGER) scheme, the Australian Government's system for tracking greenhouse gas emissions and energy use. It is available at: https://cer.gov.au/markets/reports-and-data/nger-reporting-data-and-registers/corporate-emissions-and-energy-data-2022-23</p> <p>At a Corporate level, the Alcoa 2023 Sustainability Report includes a summary of this data, and is available at: https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf</p> |
| 5.2 GHG emissions reductions | Conformance | The Entity has committed to some initiatives to reduce GHG emissions including increasing the use of renewable electricity and stabilising the production process to reduce emissions. Alcoa has issued an updated decarbonisation roadmap in 2024, disclosed in the 2023 Sustainability Report: https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf |
| 5.3a Aluminium Smelting (management system) | Conformance | The Entity recognises that Aluminium Smelting presents a carbon intensive process for the organisation from which to abate emissions. As a result, the Entity uses its ISO |

| CRITERION | RATING | COMMENT |
|---|----------------|---|
| | | certified EMS and Environmental Improvement Plans to evaluate operational procedures and limit direct emissions where feasible, such as furnace operations, pot start up, and pot operating procedures. |
| 5.3b Aluminium Smelting (up to and including 2020) | Conformance | It has been forecast by the Entity that Scopes 1 and 2 emissions intensity will be below 8 t CO ₂ e/t – at approximately 7.1 t CO ₂ e/t in 2030. |
| 5.3c Aluminium Smelting (after 2020) | Not Applicable | This Criterion is not applicable, as the Entity has not commissioned new Aluminium Smelting Facilities after 2020. |
| PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE | | |
| 6.1 Emissions to Air | Conformance | The Entity has established multiple procedures to quantify and report Emissions to Air that have adverse effects on humans or the environment and has implemented initiatives to minimise these adverse impacts. The Entity performs a health risk assessment to assess the potential impact of the emissions on public health. Monitoring is carried out in accordance with the requirements set by the National Association of Testing Authorities (NATA), and there is a schedule in place for conducting the monitoring, which is specified in the environmental monitoring manual. An environmental risk assessment relating to air emissions has been undertaken for the smelter site to enable the development of a risk-based air monitoring program and show compliance against license conditions. |
| 6.2 Discharges to Water | Conformance | Water discharge records are kept in accordance with legal requirements. Water discharges are reported annually to the National Pollutant Inventory (NPI) and publicly available at: https://www.npi.gov.au/npidata/action/load/individual-facility-detail/criteria/state/VIC/year/2023/jurisdiction-facility/00004729 Water discharge quantities and discharge sources are disclosed in the 2023 Sustainability Report: https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf The Entity also reports water quality in accordance with the Mineral Council of Australia's (MCA) Water Accounting Framework. The Entity has also conducted a water discharge risk assessment. Improvements to water discharges and management are documented in the site Environmental Improvement Plan (EIP). |
| 6.3a Assessment and Management of Spills and Leakage (assessment) | Conformance | The Entity appropriately assesses, mitigates and manages its potential Spills and Leakages. The Entity understands its major risk areas and has ensured that all external communications plans, Stakeholder guidelines, |

| CRITERION | RATING | COMMENT |
|---|----------------|---|
| | | compliance controls and monitoring programs work in tandem to detect and mitigate Spills and/or Leakages. |
| 6.3b Assessment and Management of Spills and Leakage (management) | Conformance | The Entity appropriately assesses, mitigates and manages its potential Spills and Leakages. The Entity understands its major risk areas and has ensured that all external communications plans, Stakeholder guidelines, compliance controls and monitoring programs work in tandem to detect and mitigate Spills and/or Leakages. |
| 6.4a Reporting of Spills (immediate disclosure) | Conformance | The Entity has taken appropriate measures to ensure that any Spills are immediately and effectively reported and that an effective incident response plan is ready to be mobilised. Periodic incident reporting as mandated by regulators is used to communicate and publicly disclose Spills and the remediation actions taken. |
| 6.4b Reporting of Spills (regular reporting) | Conformance | The Entity has not reported any significant Spills to date. However, minor Spills and leaks have been reported to the Victorian Environment Protection Authority (EPA) in accordance with the requirements of the Entity's EPA license. Additionally, if a Spill or its remediation breaches any conditions of the Entity's EPA license, the incident is publicly disclosed in the annual performance statement. As per the 2023 Sustainability Report, the Entity defines a major Spill as having a significant and potentially lasting impact on ecosystems or communities. In 2023, the Entity recorded zero major Spills. |
| 6.5a Waste management and reporting (strategy) | Conformance | The Entity has considered how best to implement a waste management strategy that integrates principles from the Waste Mitigation Hierarchy. This is reflected in the Entity's Waste Management Manual. Alcoa Corporate manages all waste management targets, and the waste data is publicly disclosed in the 2023 Sustainability Report: https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf |
| 6.5b Waste management and reporting (disclosure) | Conformance | The Entity has taken the appropriate steps to quantify the amount of both Hazardous and Non-Hazardous Waste generated across operations and publicly disclosed the information in the 2023 Sustainability Report: https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf |
| 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. |

| CRITERION | RATING | COMMENT |
|--|----------------|--|
| 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) | Conformance | The Entity has implemented a Spent Pot Lining (SPL) management plan as part of its operational standards, and this offers guidance on how SPL is expected to be stored and managed. Moreover, along with the Waste Management Manual, the Entity has initiated processes to recover and recycle carbon and refractory materials. It has also mitigated untreated SPL to landfill and/or water sources. |
| 6.7b Spent Pot Lining (SPL) (recovery and recycling) | Conformance | The Entity has optimised processes for the recovery and recycling of SPL. A contract is in place with an external recycler, and the Entity sends SPL for treatment. |
| 6.7c Spent Pot Lining (SPL) (Untreated SPL) | Conformance | As per the Entity's SPL Management Guidelines and Standards (2020), the Worldwide SPL Lead Team reviews all proposed SPL treatment technologies against current acceptable performance standards and potential downstream adverse environmental impacts. Effective treatment processes may be utilised to render SPL safe for disposal in double or composite lined land disposal units. Treatment technologies are carefully reviewed to ensure proper management and minimise releases of hazardous constituents to the environment from air emissions, water discharge, and/or treatment residue. |
| 6.7d Spent Pot Lining (SPL) (review of alternatives) | Conformance | As per the Entity's SPL Management Guidelines and Standards (2020), the Worldwide SPL Lead Team reviews all proposed SPL treatment technologies against current acceptable performance standards and potential downstream adverse environmental impacts. Effective treatment processes may be utilised to render SPL safe for disposal in double or composite lined land disposal units. Treatment technologies are carefully reviewed to ensure proper management and minimise releases of hazardous constituents to the environment from air emissions, water discharge, and/or treatment residue. |

| CRITERION | RATING | COMMENT |
|---|-------------|---|
| 6.7e Spent Pot Lining (SPL) (marine and aquatic environments) | Conformance | The Entity utilises on site designated storage buildings/containers to store SPL prior to recycling. No discharge to marine or aquatic environments occurs. |
| 6.8a Dross (recovery) | Conformance | The Entity limits Dross residue exposure to the environment. Consistent with the Waste Management Manual, the Entity has established a framework that maximises the recycling of treated Dross and demonstrates a regular commitment to finding alternative options to treat, manage Dross waste, and divert it from landfill. This recycling process operates primarily as a closed-loop system, maximising material recovery and minimisation of waste. |
| 6.8b Dross (recycling) | Conformance | The Entity limits Dross residue exposure to the environment. Consistent with the Waste Management Manual, the Entity has established a framework that maximises the recycling of treated Dross and demonstrates a regular commitment to finding alternative options to treat, manage Dross waste, and divert it from landfill. |
| 6.8c Dross (review of alternatives) | Conformance | Consistent with the Waste Management Manual, the Entity demonstrates a regular commitment to finding alternative options to treat, manage Dross waste, and divert it from landfill. |
| PRINCIPLE 7 WATER STEWARDSHIP | | |
| 7.1a Water assessment (mapping) | Conformance | The Entity has mapped and quantified its water withdrawal and use by source and type. |
| 7.1b Water assessment (risk assessment) | Conformance | To mitigate water security risks, the Entity engaged a consultant to review the risk assessment, develop a management plan, and set specific targets for the Entity. By the end of 2024, it aims to establish draft water reduction targets. |
| 7.2a Water management (management plans) | Conformance | Water allocation from the aquifer is determined based on established limits and ongoing monitoring. The Entity plans its water allocation approximately ten years in advance, utilising modelling and incorporating contingencies for climate change. Regular discussions are held with the local water utility company to ensure effective management. In 2023, the Entity conducted a comprehensive water risk review that included a thorough assessment of climate change impacts. It maintains a detailed risk register that encompasses all relevant assessments from this review, addressing key areas such as water security, excess water risk, supply diversity and regulatory compliance. |

| CRITERION | RATING | COMMENT |
|--|-------------|---|
| 7.2b Water management (monitoring) | Conformance | The Entity monitors the effectiveness of their water stewardship plan annually around key water use reduction and discharge water quality targets. |
| 7.3 Disclosure of water usage and risks | Conformance | The Entity discloses water withdrawal and use and Material water-related risks in the 2023 Sustainability Report: https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf |
| PRINCIPLE 8 BIODIVERSITY | | |
| 8.1 Biodiversity assessment | Conformance | The Entity has undertaken a specific Biodiversity risk assessment as outlined in its 'Biodiversity Action Plan Land Management 2022'. The assessment was based on the aspects and impacts approach in accordance with ISO 14001 certification requirements. |
| 8.2a Biodiversity management (biodiversity action plans) | Conformance | The Entity's 'Biodiversity Action Plan Land Management 2022' considers issues within the smelter's Area of Influence. Identified issues include (but are not limited to) feral animals, biodiversity knowledge and information, fauna and flora management for species of significance such as koalas, spider orchids, emus, wrens and macropods, as well as other values, including heathland and cultural heritage. The Entity has commenced the koala habitat rehabilitation programme with consultation from experts. The progress of the programme is publicly disclosed at: https://www.alcoa.com/australia/en/news/releases?id=2023/05/portland-aluminum-establishes-new-koala-habitat&year=y2023 The Entity also publishes news articles on this programme in the local newspaper. |
| 8.2b Biodiversity management (consultation and mitigation hierarchy) | Conformance | The Biodiversity Action Plan was developed through a consultative process, adhering to the principles of the Biodiversity Mitigation Hierarchy. Currently, Alcoa Corporate is preparing an updated version of this Plan, which includes a Biodiversity Ecosystem Services pre-assessment for all sites across Australia. This approach aims to ensure that Biodiversity considerations are integrated into decision-making and management practices effectively. |
| 8.2c Biodiversity management (reporting) | Conformance | The most significant Biodiversity issue is koala management. The operations have conducted extensive consultation on the matter, sharing key outcomes of the plan's actions as confirmed through Stakeholder interviews. |

| CRITERION | RATING | COMMENT |
|---|----------------|--|
| 8.3 Alien Species | Conformance | The 'Biodiversity Action Plan Land Management 2022' considers issues of feral animals and weed management. The emphasis of the approach is the treatment and control of weeds that are already established in the area. |
| 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. |
| PRINCIPLE 9 HUMAN RIGHTS | | |
| 9.1a Human Rights Due Diligence (policy) | Conformance | The Entity has implemented the Alcoa Global Human Rights Policy, available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf Along with corporate Policy, the Entity also must comply with Australian Regulations for Human Rights. The Policy is extended to include suppliers, Contractors and Joint Ventures. |
| 9.1b Human Rights Due Diligence (process) | Conformance | A Human Rights Due Diligence Process was implemented to identify potential risks and implement actions to eliminate or minimise risks. The scope involved the identification of risks and impacts, remediation, Grievance Mechanism, reporting and feedback, on the following topics: working and labour conditions, safety, land management, integrity, health, safety and environment, relationships with communities, suppliers and customers. The Human Rights Impact Assessment contains action plans in a number of areas. |
| 9.1c Human Rights Due Diligence (remediation) | Conformance | In the Human Rights Due Diligence completed in 2022, the Entity did not identify any adverse impacts. The Entity has published a Modern Slavery Statement on its website. The Entity's Human Rights Due Diligence is intended to meet the UNGP requirements on Human Rights Due Diligence. The Human Rights Management Standard includes remedial measures, such as the process for providing remedies for any negative Human Rights impacts and the substantive outcomes that can counteract, or mitigate those negative impacts. |

| CRITERION | RATING | COMMENT |
|--|----------------|--|
| 9.2 Women's Rights | Conformance | The Entity has established Policies and processes to ensure respect for the rights and interests of women. The Entity has exceeded established gender diversity targets. Worker interviews with female Workers during the Audit confirmed there is no Discrimination from supervisors or colleagues. |
| 9.3 Indigenous Peoples | Conformance | Alcoa Corporation has in place an Indigenous Peoples Policy, a global Indigenous and Land-Connected Peoples Standard and a Cultural Heritage Management Standard. The Policy references the requirements 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). Interviews with local Indigenous Representatives confirmed the relationship is very respectful between Entity staff and Traditional Owners. The Alcoa Indigenous People Policy is published at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy |
| 9.4 Free, Prior, and Informed Consent (FPIC) | Conformance | There is no new development planned by the Entity, however, it has an established a process to consult and cooperate in good faith with the Indigenous Peoples on a wide range of issues. This was confirmed by interviews with Traditional Owners. Alcoa has also publicly disclosed its Indigenous People's Policy at: https://www.alcoa.com/sustainability/social/human-rights Where Indigenous and other peoples with connections to land are acknowledged by governments, in accordance with the Policy, the Entity will act in accordance with all Applicable Laws and regulations as well as 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). |
| 9.5 Cultural and sacred heritage | Conformance | The Entity has been in operation since the 1980s and the site has a static operational 'footprint'. There are no known cultural values within the Entity's Area of Influence. The Entity has an established process to consult and cooperate in good faith with the Indigenous Peoples should sites or artefacts be identified in future. |
| 9.6a Resettlements (avoid or minimise) | Not Applicable | This Criterion is not applicable as there are no projects where the physical displacement of Communities or people is necessary or relevant. |

| CRITERION | RATING | COMMENT |
|--|----------------|--|
| 9.6b Resettlements (where unavoidable) | Not Applicable | This Criterion is not applicable as there are no projects where the physical displacement of Communities or people is necessary or relevant. |
| 9.7a Local Communities (rights and interests) | Conformance | Social Management Plans and a social performance scorecard are in place to address community and Stakeholder engagement. The plan includes a baseline measurement via a 'Community Perception and Reputation Survey'. From this, there is a scorecard for 'Key Social Performance Indicators'. Community Stakeholder interviews confirmed that the Entity demonstrated that they respect the legal and customary rights and interests of Local Communities in their lands, livelihoods and their use of natural resources. |
| 9.7b Local Communities (impacts) | Conformance | The Entity's Social Management Plans include appropriate steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities. During a Stakeholder interview with a nonprofit organisation, it was stated that the Entity has a strong reputation within the Portland community. Additionally, in a Worker interview, it was noted that the Entity provides employment opportunities to the Local Community. |
| 9.7c Local Communities (livelihoods) | Conformance | Worker and Stakeholder interviews confirmed that the Entity is focused on providing employment opportunities to the Local Community and supports the local football team, which includes Indigenous members. |
| 9.8 Conflict-Affected and High-Risk Areas | Conformance | Alcoa integrates OECD Due Diligence Guidelines into its responsible sourcing approach. There was no evidence found indicating any contribution to armed conflict or Human Rights abuses. Businesses that engage with the Entity are not listed as located within Conflict-Affected and High-Risk Areas (CAHRAs). The supplier approval programme includes a third-party assessment that involves a variety of metrics related to CAHRAs and a corrective action strategy developed if these are not met. |
| 9.9 Security practice | Conformance | Public and private security providers respect Human Rights in line with recognised standards and good practices. All Contractors are provided regular training on security practices including training on respecting Human Rights. |
| PRINCIPLE 10 LABOUR RIGHTS | | |
| 10.1a Freedom of Association and Right to Collective Bargaining (freedom of association) | Conformance | The Entity's Human Rights Policy and Code of Conduct both demonstrate the Entity respects the rights of Workers to associate freely in Labour Unions, seek |

| CRITERION | RATING | COMMENT |
|---|----------------|--|
| | | <p>representation and allow for joining Workers' councils. Refer to: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p> <p>Employee interviews confirmed that there is complete Freedom of Association on site.</p> |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining) | Conformance | Interviews with Workers and managers on site confirm that the Entity respects the rights of Workers to Collective Bargaining and participate in any Collective Bargaining process. |
| 10.1c Freedom of Association and Right to Collective Bargaining (alternative means) | Not Applicable | This Criterion is not applicable as Applicable Law in Australia does not restrict the right to Freedom of Association and Collective Bargaining. |
| 10.2a Child Labour (minimum age) | Conformance | Whilst the minimum age for employment in Australia is 15 years of age, the Entity requires apprentices to be at least 18 years old, and they are not permitted to operate heavy machinery. The Full Time Equivalent (FTE) age is set at 21. |
| 10.2b Child Labour (hazardous) | Conformance | The Entity's Human Rights Policy confirms that the hiring practices conform to the International Labour Organization (ILO) conventions for minimum age and Child Labour and applicable local laws. In Victoria, the restrictions for Child Labour are set by the Child Employment Act. |
| 10.2c Child Labour (worst forms) | Conformance | The Entity's Human Rights Policy confirms that the hiring practices conform to the International Labour Organization (ILO) conventions for minimum age and Child Labour and applicable local laws. In Victoria, the restrictions for Child Labour are set by the Child Employment Act. |
| 10.3a Forced Labour (human trafficking) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators of Forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3b Forced Labour (deposits, fees, advances) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators for |

| CRITERION | RATING | COMMENT |
|---|-------------|---|
| | | Forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3c Forced Labour (migrant workers) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators of Forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3d Forced Labour (debt bondage) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators of Forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3e Forced Labour (freedom of movement) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators of Forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators of Forced Labour. Visa checks are also undertaken by the Entity as required. |
| 10.3g Forced Labour (freedom to terminate employment) | Conformance | The Freedom of Association requirements of the Fair Work Act 2009 (Commonwealth) means that the clauses relating to termination of employment are binding for Migrant Workers. Employee interviews confirmed that there is complete Freedom of Association and that there is no Forced Labour. |
| 10.4 Non-Discrimination | Conformance | The Entity has implemented the Alcoa global Equal Opportunity Policy: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/equal-employment-opportunity#:~:text=Individuals%20must%20be%20treated%20fairly,policies%20and%20code%20of%20conduct There are three Entity-wide employee resource groups: the Alcoa Women's Network, AWARE (Alcoas Working Actively for Racial-Ethnic Equality) and EAGLE (Employees at Alcoa for Gay, Lesbian [Bisexual and Transgender] Equality). Each group provides information and resources, a support network and organises group |

| CRITERION | RATING | COMMENT |
|---|-------------|---|
| | | activities. Worker interviews confirmed there is no Discrimination. |
| 10.5 Communication and engagement | Conformance | The Entity demonstrates open communication and direct engagement with Workers and their representatives. There are numerous mechanisms for Workers to raise issues. Worker interviews confirmed that Workers are aware of these processes and were comfortable with raising issues to management. |
| 10.6 Disciplinary practices | Conformance | The Entity's Code of Conduct includes zero tolerance to bullying and Harassment and gender-based issues like sexual Harassment. This is reinforced by numerous Policies and information posters in the plant. Worker interviews confirmed that there were no workplace issues corporal punishment, mental or physical coercion, Harassment, or gender-based Violence including sexual Harassment, or verbal abuse of Workers. |
| 10.7a Remuneration (living wage) | Conformance | Worker interviews confirmed that salaries are above award rates which are well above a living wage including labour hire and contract staff. Some labour hire arrangements are in place and these meet the requirements of the Victorian Labour Hire Act 2018. |
| 10.7b Remuneration (method of payment) | Conformance | Documentation and Worker interviews confirmed that the Entity makes salary payments promptly by internet transfer for all employees, including labour hire staff and contract staff. |
| 10.8 Working Time | Conformance | Worker interviews confirm the Entity complies with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave. |
| PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY | | |
| 11.1a Occupational Health and Safety (OH&S) Policy (policy) | Conformance | In addition to Alcoa Corporate Policies, the Entity has developed its own EHS Policy, signed and endorsed by the Smelter Manager, available at: https://www.alcoa.com/australia/en/pdf/portland-aluminium-environment-health-and-safety-policy.pdf |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors) | Conformance | The Entity's Occupational Health and Safety (OH&S) and EHS Policy is applied to both Workers and Visitors. This was confirmed by Worker interviews. The audit team was inducted on both Policies and systems at Portland. |
| 11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards) | Conformance | The Entity's OH&S and EHS Policy is applied to both Workers and Visitors. This was confirmed by Worker interviews. The audit team was inducted on both Policies and OH&S systems at Portland. |

| CRITERION | RATING | COMMENT |
|--|-------------|--|
| | | https://www.worksafe.vic.gov.au/all-acts-and-regulations |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work) | Conformance | It was noted in Worker interviews that Workers understood that they have the right to stop work for safety reasons, and some had done this. Compliance with Applicable Laws is mentioned which also inter alia covers ILO requirements to which Australia is a signatory. |
| 11.2 OH&S Management System | Conformance | The Entity has developed and implemented an OH&S Management System which is independently certified to ISO 45001:2018. |
| 11.3 Employee engagement on health and safety | Conformance | The Entity has various levels of engagement with Workers. Crews meet monthly and have a crew action plan with leading and lagging indicators, training and checks, 'Top 5' issues and crew safety projects. Each team is visited on a monthly basis. The OH&S Committee and area management meet with the OH&S representatives as a series of rolling meetings to discuss projects and issues. The health and safety representatives from each area meet to share issues that they are having to identify common issues and concerns. |
| 11.4 OH&S performance | Conformance | The Entity evaluates its Occupational Health and Safety (OH&S) performance via leading and lagging indicators which form part of a weekly distribution to senior managers, a quarterly online report and regulatory reports for WorkSafe Victoria. Alcoa Corporate reports Health and Safety data in its 2023 Sustainability Report covering all sites: https://www.alcoa.com/sustainability/pdf/2023-Sustainability-Report.pdf |

Document Control and Version History

| Revision | Date | Notes |
|----------|------------------|--|
| 0 | 17 April 2023 | Initial Certification Audit - Full Certification |
| 1 | 19 December 2024 | Surveillance Audit |