

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Alcoa Massena

CERTIFICATE NUMBER  
**186**

ASI STANDARD  
**PERFORMANCE  
STANDARD  
(V3.1 2023)**

CERTIFICATION LEVEL  
**FULL  
CERTIFICATION**

ASI ACCREDITED  
AUDITING FIRM  
**DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.**

DATE OF ISSUE  
**27 JULY 2025**

DATE OF EXPIRY  
**26 JULY 2028**

CERTIFIED SINCE  
**2 MARCH 2022**

## AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a large, flowing 'A' followed by a horizontal line.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
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*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at*  
**[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)**

## CERTIFICATION SCOPE

Aluminium Smelting, Casthouse  
and associated administrative  
facilities at Alcoa Massena (USA).

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa Massena
CERTIFICATION SCOPE	Aluminium Smelting, Casthouse and associated administrative facilities at Alcoa Massena (USA).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (24 – 25 January 2022)</li><li>Surveillance Audit (4 – 6 May 2022)</li><li>Re-Certification Audit and Scope Change (13 – 16 May 2025)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>24 – 25 January 2022 (Initial Certification Audit)</li><li>4 – 6 May 2022 (Surveillance Audit)</li><li>13 – 16 May 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>5 February 2022 (Initial Certification Audit)</li><li>21 June 2022 (Surveillance Audit)</li><li>2 July 2025 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 25 January 2022)</u></p> <p>The Audit Scope covered the Aluminium Smelting, Casthouse and administrative associated facilities at Alcoa Massena (USA).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (January 2022), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a ‘desktop’ exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p> <p><u>Surveillance Audit (4 – 6 May 2022)</u></p> <p>The Audit Scope covered the Aluminium Smelting, Casthouse and administrative associated facilities at Alcoa Massena (USA).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li></ul>

- Casthouses

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

Re-Certification Audit and Scope Change (13 – 16 May 2025)

The Audit Scope included Aluminium Smelting, Casthouse and administrative associated facilities at Alcoa Massena (USA).

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

27 July 2025 – 26 July 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

26 July 2027

CERTIFICATE NUMBER

186



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

## ENTITY OVERVIEW

Alcoa USA Corp. Massena Operations (Alcoa Massena, or the 'Entity'), located in Massena, New York, USA is engaged in Aluminium production, encompassing the operation of an anode baking furnace, a primary Aluminium smelting production facility (potline), casting furnaces, heat treat furnaces, and other supporting sources for Aluminium production.

The Entity produces a variety of saleable products, including Aluminium prime ingots, continuous cast rods, round extrusion and forging billets, with an annual production of approximately 135,000 metric tonnes. Key production facilities include a Pre-Bake Potline with 198 pots and one Casthouse. The Facility spans 324 hectares and employs approximately 550 workers. Operations at the site commenced in 1903.

The Entity's products are primarily distributed within North America, with end applications including building and construction extrusions such as door and window frames, and cast rods used for welding wire. Key external stakeholders include the St. Lawrence County Industrial Development Association, the Town of Massena, Massena Electric Company, the New York Power Authority and the New York State Department of Environmental Conservation. The nearest sensitive receptors to the site are Madison Elementary School and the St. Lawrence River.

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of Systems, Residual Risk and Performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	High	High	High	HIGH
<b>RISKS</b>	High	High	Medium	HIGH
<b>PERFORMANCE</b>	High	Medium	High	HIGH
<b>OVERALL</b>	HIGH			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	<p>The Entity maintains legal and regulatory Compliance through a structured framework that includes collaboration between the Legal team and the Ethics &amp; Compliance team across key jurisdictions. Regulatory updates are monitored through external advisory bodies and internal tools, with changes reviewed by subject matter experts in coordination with Legal and Corporate teams. Upon confirmation of a regulatory change, relevant policies, onboarding materials and Compliance platforms are updated accordingly.</p>
1.2 Anti-Corruption	Conformance	<p>A comprehensive framework has been implemented to uphold ethical conduct and prevent Corruption. Internal procedures and compliance mechanisms are actively enforced to ensure integrity across operations.</p> <p>A commitment to anti-Corruption is clearly established in the Entity's Code of Conduct and Ethics, pages 10 to 17, available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</a></p> <p>Other relevant Policies and information are available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption</a> and <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/supplier_standards.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/supplier_standards.pdf</a></p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles relevant to its Environmental, Social and Governance (ESG) performance. The Code of Conduct and Ethics can be accessed at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</a></p> <p>The same rules for conduct and ethics are applicable to suppliers. A specific Code of Conduct has been implemented for suppliers, which is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/supplier_standards.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/supplier_standards.pdf</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has in place 'stand-alone' Policies consistent with the Environmental, Social, and Governance (ESG) practices included in the ASI Performance Standard. A Health, Safety and Environmental (HSE) Policy is established and communicated to every employee. A Policy Against Workplace Harassment is also established, reviewed and communicated. There is senior management support for the Policies.</p> <p>All relevant Policies were reviewed in the last five years. Policies are stored and communicated to employees through the Entity's internal website.</p> <p>The Policies are available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance">https://www.alcoa.com/global/en/who-we-are/ethics-compliance</a></p>
2.2a-c Leadership	Conformance	<p>The Entity has nominated the Plant manager as the Management Representative to lead the implementation and communication of its ASI-related Policies.</p>

CRITERION	RATING	COMMENT
		Adequate resources are provided to ensure implementation, maintenance and improvement of the ASI Management System.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity's Management System conforms to ISO 14001:2015 and ISO 45001:2018 Standards and the Alcoa Corporate Environmental, Health and Safety Management System Standard. The Entity's ISO 14001:2015 Certificate is valid to December 2026, and the last surveillance audit was undertaken in October 2024.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has implemented a Social Management System aligned with legal, procedural and Human Rights standards. The Social Management System involves annual Stakeholder reviews, a formal grievance mechanism accessible to all Stakeholders and targeted community investments. This Social Management System demonstrates the Entity's strong social awareness and a commitment to its employees and the community.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented the Alcoa Group's Responsible Sourcing Program and Supplier Sustainability Programs as well as the Ecovadis program that includes the approved Responsible Sourcing Policies. These Programs are managed by Alcoa Corporate.</p> <p>Purchasers assist with the identification and management of suppliers in these programs. The Responsible Sourcing Policies are up-to-date and reviewed regularly.</p> <p>Information on the Programs including the relevant Policies are available at:  <a href="https://www.alcoa.com/global/en/contact/supplier#supplier-sustainability-program">https://www.alcoa.com/global/en/contact/supplier#supplier-sustainability-program</a>  <a href="https://www.alcoa.com/global/en/contact/supplier/responsible-sourcing-program">https://www.alcoa.com/global/en/contact/supplier/responsible-sourcing-program</a></p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as no New Projects or Major Changes took place within the last three years nor are any currently planned.</p> <p>The Entity has however completed an updated environmental aspects and impacts assessment for their location.</p> <p>All capital projects must go through the Alcoa Corporate level Project Environmental Safety and Health Review (PESHR) process.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as no New Projects or Major Changes took place within the last three years nor are any currently planned.</p> <p>The Entity's project delivery process requires the evaluation of environmental, energy, safety, cultural and Human Rights impacts when performing Major Changes or New Projects, by using the Project Environmental Safety and Health Review (PESHR) Form. The PEHSR Form is completed prior to the approval of a project and grant of project funding.</p>
2.7a-f Emergency Response Plan	Conformance	The Entity has developed different Emergency Response Plans that consider all possible scenarios on site. These plans are reviewed annually or following the periodic emergency response training and

CRITERION	RATING	COMMENT
		<p>drills. Emergency Response Plans are available upon request and shared with appropriate local emergency agencies as required.</p> <p>The Entity maintains an on-site fire brigade team. Drills are planned and conducted by the fire brigade.</p>
2.8a-d Suspended Operations	Conformance	An operational risk management framework has been established to address potential disruptions, including suspension scenarios. Key operational risks have been assessed and corresponding mitigation measures have been identified and documented. The framework includes structured response procedures and a communication strategy, ensuring readiness and transparency. The system has undergone review within the last five years.
2.9a-b Mergers and Acquisitions	Conformance	ESG issues are reviewed as part of the Due Diligence process for mergers and acquisitions. These elements are governed centrally by Alcoa Corporate. There were no local examples of mergers and acquisitions at the Entity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>Alcoa Corporate has implemented a standard on Environment, Health and Safety Assessments of Prospective Acquisitions and Divestitures, and financial accounting standards on Asset Retirement Obligations and Environmental Tax Only Assets. These standards define how ESG issues are reviewed in the processes for closure, decommissioning, and divestment, as well as how to address individual liabilities at the relevant locations.</p> <p>The Entity follows the procedures established by Alcoa Corporate for such closure, decommissioning, and divestment events.</p>
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity provides data to Alcoa Corporate regarding financial, environmental, social and governance performance via monthly reports and PowerBI indicators. The Alcoa Corporate team compiles and publishes the results in the Group Sustainable Development Report, available at: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a>
3.2 Non-compliance and Liabilities	Conformance	<p>Alcoa Corporation publicly files annual and quarterly reports with the U.S. Securities and Exchange Commission (SEC) which disclose the Company's fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law, to the extent Material or required based on significance thresholds in the securities laws. These reports are publicly available at: <a href="https://investors.alcoa.com/sec-filings/default.aspx">https://investors.alcoa.com/sec-filings/default.aspx</a></p> <p>This information is also published in the annual Sustainability Report available at: <a href="https://www.alcoa.com/sustainability">https://www.alcoa.com/sustainability</a></p> <p>Environmental violations, fines and judgements are publicly available on the EPA database based on the relevant activity at:  <a href="https://echo.epa.gov/detailed-facility-report?fid=110000582735">https://echo.epa.gov/detailed-facility-report?fid=110000582735</a>  <a href="https://echo.epa.gov/detailed-facility-report?fid=110070049979">https://echo.epa.gov/detailed-facility-report?fid=110070049979</a>  <a href="https://echo.epa.gov/detailed-facility-report?fid=110070069670">https://echo.epa.gov/detailed-facility-report?fid=110070069670</a></p> <p>Health, Safety and Labour violations and fines are publicly available through the US Department of Labor enforcement website at: <a href="https://enforcedata.dol.gov/views/data_catalogs.php">https://enforcedata.dol.gov/views/data_catalogs.php</a></p>

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	<p>The Entity only makes payments to government where required by regulations, such as authorisation requests, payment of fees and taxes. All payments to governments are taxes or other fees and are reported in the Entity's Annual Report, available at: <a href="https://investors.alcoa.com/financials/annual-reports-and-proxy-statements/default.aspx">https://investors.alcoa.com/financials/annual-reports-and-proxy-statements/default.aspx</a></p> <p>Payments related to withholding taxes and employer contributions are managed by Alcoa Canadian Shared Services. All donations or charitable contributions are made after a review and assessment process to ensure these payments are not made to governments or authorities.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	<p>The Entity has implemented a Complaints and Concerns Procedure, established and updated in 2025, to enable internal and external Stakeholders to confidentially report grievances. This procedure ensures that all complaints are documented, tracked, and addressed through defined corrective actions. A complaint can be raised by selecting 'contact us' from the Entity's page via the Alcoa website at: <a href="https://www.alcoa.com/global/en/contact/united-states">https://www.alcoa.com/global/en/contact/united-states</a></p> <p>However, the Complaints Resolution Mechanism itself has not been made publicly available.</p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity currently has a certified Environmental Product Disclosure (EPD) for the 'low-carbon' Product Ecolum which is produced at the Massena site. A Life Cycle Assessment (LCA) was conducted at a corporate level to support the EPD, on a 'cradle-to-gate' basis including impacts from the raw material supply, transportation to the manufacturer and manufacturing stages.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity currently has a certified EPD for the 'low-carbon' Product Ecolum which is produced at the Massena site. An LCA was conducted at a corporate level to support the EPD, on a 'cradle-to-gate' basis including impacts from the raw material supply, transportation to the manufacturer and manufacturing stages.</p> <p>The EPDs and Carbon Footprint Certificates are available upon request, and at: <a href="https://spot.ul.com/">https://spot.ul.com/</a></p> <p>The Entity's website contains further information on the availability of EPDs for EcoLum Primary Aluminium Products and Carbon Footprint Certificates for EcoSource Alumina Products at: <a href="https://fr-ca.alcoa.com/products/sustana">https://fr-ca.alcoa.com/products/sustana</a></p>
4.2 Product Design	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity minimises the generation of Aluminium Process Scrap while focusing on maximising the use and recycling of Scrap by implementing operational procedures and Scrap segregation, identification and traceability by alloys, grades and specifications.</p> <p>Furnace operator training reflects tasks in support of the separation of Aluminium alloys and grades for recycling. Relevant performance indicators and targets are established and followed up at a plant level.</p>



CRITERION	RATING	COMMENT
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity operates a 'Scrap loop' with its customers. In its regular operations, the Entity is not involved in 'end-of-life' recycling of Products. The Alcoa Corporation does however contribute to 'end-of-life' recycling.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity accounts for its Material Greenhouse Gas (GHG) emissions and energy use by source on an annual basis, including Scope 1, 2 and 3 emissions.</p> <p>Alcoa Corporate aggregates GHG emissions data from all Alcoa sites and discloses data in the annual Sustainability Report at: <a href="https://www.alcoa.com/sustainability">https://www.alcoa.com/sustainability</a></p> <p>The Corporate annual GHG Sustainability Reporting is audited by an independent third party.</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity. The Entity has no plans to commence a new Aluminium Smelter after 2020.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Conformance	The Entity is an Aluminium Smelter that was in production prior to 2020, and emissions are significantly below 11 tonnes CO <sub>2</sub> e/metric tonne of Aluminium.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity operates under the Alcoa Corporate GHG Emissions Reduction Plan consistent with a 1.5°C warming scenario. The Corporate Plan is to reduce its emissions by 30% by 2025, 50% by 2030 and aims for carbon neutrality by 2050. The GHG Emissions Reduction Plan is consistent with the ASI endorsed methodology. The Alcoa Climate Change Policy, inclusive of the GHG Emissions Reduction Plan is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/climate-change-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/climate-change-policy</a>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity operates under the Alcoa Corporate GHG Emissions Reduction Plan consistent with a 1.5°C warming scenario. The Corporate Plan is to reduce its emissions by 30% by 2025, 50% by 2030 and aims for carbon neutrality by 2050. The GHG Emissions Reduction Plan is consistent with the ASI endorsed methodology. The Alcoa Climate Change Policy, inclusive of the GHG Emissions Reduction Plan is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/climate-change-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/climate-change-policy</a></p> <p>Alcoa publicly discloses progress against the GHG Emissions Reduction Plan on an annual basis through its annual Sustainability Report at: <a href="https://www.alcoa.com/sustainability">https://www.alcoa.com/sustainability</a></p>

CRITERION	RATING	COMMENT
		The Entity has established a ten-year plan that includes overall CO <sub>2</sub> equivalent intensity reductions, anode effect minimum pot day reductions and gross carbon consumption reductions. This plan is reviewed annually, as well as on any changes to the business that alter targets.
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented a Management System including operational controls to manage direct GHG emissions, operating procedures for the bake furnace based on Alcoa's best firing practice, employee training and performance indicator reviews. Daily performance indicators for anode effects are tracked at the department and plant level DMS meetings.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity quantifies and annually reports its inventory of Emissions to Air as required by the Air Permit issued by the government. The data are available on the EPA database at: <a href="https://echo.epa.gov/detailed-facility-report?fid=110000582735">https://echo.epa.gov/detailed-facility-report?fid=110000582735</a></p> <p><a href="https://echo.epa.gov/detailed-facility-report?fid=110070049979">https://echo.epa.gov/detailed-facility-report?fid=110070049979</a></p> <p><a href="https://echo.epa.gov/detailed-facility-report?fid=110070069670">https://echo.epa.gov/detailed-facility-report?fid=110070069670</a></p> <p>Data relating to Emissions to Air are also publicly disclosed in the annual Sustainability Report and associated Databook, both available at: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></p> <p>The Entity conducts emissions sampling of its stacks at various frequencies. If excessive emissions are measured, the Facility is required to notify the relevant State and Federal agencies, provide a plan to correct the situation, implement that plan and conduct stack sampling to demonstrate that the corrective actions were effective.</p> <p>The Entity also maintains plans to minimise exposure to, and impacts from, Emissions to Air. The Plans are reviewed periodically.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity quantifies and annually reports its Discharges to Water as required by the permit issued by the government. The data are available on the EPA database at: <a href="https://echo.epa.gov/detailed-facility-report?fid=110000582735">https://echo.epa.gov/detailed-facility-report?fid=110000582735</a></p> <p><a href="https://echo.epa.gov/detailed-facility-report?fid=110070049979">https://echo.epa.gov/detailed-facility-report?fid=110070049979</a></p> <p><a href="https://echo.epa.gov/detailed-facility-report?fid=110070069670">https://echo.epa.gov/detailed-facility-report?fid=110070069670</a></p> <p>Data relating to Discharges to Water are also available in the annual Sustainability Report and associated Databook at: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></p> <p>The Entity has developed and implemented plans to minimise exposure to and impacts from its Discharges to Water, including a Water Management Plan, a Spill Prevention Control and Countermeasure Plan and corporate self-assessment standards. All plans are reviewed at least every five years. The Water Management Plan is available upon request.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has established and implemented a Spill Prevention Control and Countermeasure Plan that identifies potential areas of concern for Spills and Leakages.

CRITERION	RATING	COMMENT
		<p>The Entity more broadly also identifies all abnormal and emergency environmental aspects, including Spills and Leakages risks and applies control measures.</p> <p>The plans implemented by the Entity describe controls and various inspections to prevent and detect Spills and Leakages. The plans are reviewed at least once every five years or after any major Spills or Leakages as part of the corrective action plan process. The plans are available upon request.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>Specific requirements for reporting of Spills and Leakages are defined in the Entity's Emergency Response Plan and the Spill Prevention Control and Countermeasure Plan. The plans include specifics on when and how to report Spills and Leakages.</p> <p>Spills and Leakages are reported to authorities as required, depending on the nature and volume of the Spill or Leakage.</p> <p>Material Spills and Leakages and their impact assessment are entered into the Entity's online system, reported to Corporate headquarters and consolidated into the annual Sustainability Report available at: <a href="https://www.alcoa.com/sustainability#Policies">https://www.alcoa.com/sustainability#Policies</a></p> <p>No Material Spills or Leakage from the Entity's activities had occurred since the previous ASI Audit.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>Hazardous and Non-hazardous Waste quantities are monitored and reported quarterly to Corporate headquarters. Data are available in the annual Sustainability Report and associated Databook at: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></p> <p>The Entity submits Hazardous Waste quantities to the federal and state agencies, as required. The reports to governments cover quantities, treatment codes, hazardous codes for each Waste, transporters and treatment facilities.</p> <p>Potential impacts on human well-being from Waste materials are addressed in the Entity's Environmental Aspect and Impacts Assessment using defined criteria.</p> <p>The Entity has developed, implemented, and maintained a Waste Management Plan, which includes a Waste strategy and minimisation plan according to the Waste Mitigation Hierarchy, a Waste summary, inspections and record keeping. This Plan considers the '10R' circular economy strategy for Waste mitigation.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	<p>The Entity has developed and implemented a Spent Pot Lining (SPL) Management Plan that outlines the procedures for storing and managing SPL at the Facility.</p> <p>The Entity focuses on extending pot life as part of its pollution prevention efforts. Pot life days are a key metric tracked to keep the pot in operation longer, thereby delaying SPL generation. Waste minimisation is achieved by removing non-SPL materials during the digging process, such as collector bars, vapor barrier steel, pot shell and pot skimming.</p> <p>SPL is sent to external supplier to be treated prior to landfilling. The Entity, in collaboration with Alcoa Corporate, is actively investigating the recycling of SPL.</p>

CRITERION	RATING	COMMENT
		Spent Pot Lining is not discharged into freshwater nor marine environments.
6.8a-d Dross	Conformance	<p>Dross is stored and management on site according to the Entity's Waste Management Plan.</p> <p>The Dross recovery percentage is set as an annual target within the Casthouse to maximise the recovery of Aluminium by treatment of Dross and Dross residues. All recovered mixed Dross is sent to a third-party recycler for metal recovery, and saltcake left over from that process is landfilled.</p> <p>Alcoa Corporate reviews initiatives to recycle saltcake from Dross. There was no viable alternative to the landfill of the Dross saltcake at the time of the Audit.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity's Water Management Plan defines approaches for determining the Entity's water balance and water use quantities by source. A water balance is prepared annually, which quantifies the Entity's water inputs and output flows, sources and destination. Water usage is monitored through the Entity's utility system.</p> <p>The Entity holds a water withdrawal permit and is required to annually submit a Water Withdrawal Reporting Form to the government.</p> <p>Alcoa Corporations's aggregated water usage is presented in its annual Sustainability Report and associated Databook at: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></p> <p>The Entity conducts water related risk assessments through its risk rank aspect registry. Water-related risks were assessed as low due to impacts arising from water use as it relates to the source watershed.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as no Material risks in the watershed were identified following the water related risk assessment conducted by the Entity.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has identified areas in which its operations may have impacts on Biodiversity. These areas were assessed in the Massena Biodiversity Action Risk Assessment, including Emissions to Air, water runoff, Waste generation, importation of raw materials and site modifications. Potential impacts on Ecosystem Services within the Entity's Area of Influence are identified and assessed in the Entity's Ecosystem Services Impact Prioritisation document.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity's Ecosystem Services Impact Prioritisation document identified only one potential impact on a Priority Ecosystem Service, relating to air quality (sulphur oxides (SOx)). This prioritisation document was shared with the Affected Population via a community board.
8.2a-g Biodiversity Management	Conformance	No Material risks and impacts to Biodiversity have been identified through the Entity's assessment process.

CRITERION	RATING	COMMENT
		The Entity has however developed a Biodiversity and Ecosystem Services Action Plan that describes activities specific to this facility that may impact local Biodiversity, summarises environmental regulations and includes mitigation actions and communications to external Stakeholders.
8.3a-c Management of Priority Ecosystem Services	Conformance	Priority Ecosystem Services are outlined in the Massena Ecosystem Services Impact Prioritisation document. There is one Priority Ecosystem Service, relating to air quality (sulphur oxides (SOx) that is identified and is being addressed.
8.4 Alien Species	Conformance	<p>The Entity has identified two risks for accidental or deliberate introduction of Alien Species. These risks are Alien Species from products purchased from foreign countries that arrive on wooden pallets and the spread of Japanese Knotweed that is present on site and in the surrounding areas.</p> <p>The Entity complies with an international program 'International Standards for Phytosanitary Measures No. 15' (ISPM-15) that requires all wooden pallets to be heat treated to kill any insects that may reside inside the wood. Japanese knotweed is already introduced and present on site; it is assessed and managed through the Biodiversity Action Plan.</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity's assessment and Biodiversity Action Plan indicate that there is no UNESCO World Heritage Area in the Entity's Area of Influence. Legal monitoring and the process for Major Projects would identify any potential changes.
8.6a-d Protected Areas	Minor Non-Conformance	<p>Protected Areas near the Facility are identified in the Massena Biodiversity and Ecosystem Services Action Plan. The nearest conservation area identified is the Wilson Hill Wildlife Management Area, a 4,000-acre open water wetland adjacent to the St. Lawrence River. It is located 15 miles to the west of the plant.</p> <p>However, the Indian Meadows detached parcels, which is a protected landscape located inside the Area of Influence along the Grass River, was not identified in the Biodiversity Action Plan.</p>
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The site adheres to a Corporate Human Rights Policy that is aligned with international principles, using workforce diversity data to inform its implementation. The Human Rights Policy is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</a></p> <p>A formal Human Rights Due Diligence process was completed in 2024, identifying key risks such as equitable employment access, Indigenous engagement and extended work hours. Stakeholder groups involved include employees, contractors, local residents and Indigenous communities. Engagement measures include a Community Advisory Board, grievance mechanisms and planned consultations. Mitigation</p>

CRITERION	RATING	COMMENT
		actions are underway, including the adjustment of work schedules and enhanced Health and Safety monitoring.
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has developed and implemented an Equal Employment Opportunity Policy that is publicly communicated through various channels including via job descriptions, policy boards, onboarding sessions, annual training. The Policy is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/equal-employment-opportunity">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/equal-employment-opportunity</a></p> <p>The Policy is emphasised during employee onboarding and is subject to regular review.</p> <p>To advance gender equity, a structured three-year Inclusion, Diversity, and Equity Plan is in place, complemented by the support of a local women's network that provides professional development opportunities. Further information on these efforts is available in the Sustainability Report and associated Databook at: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></p>
9.3a-i Indigenous Peoples	Conformance	<p>The Entity's Human Rights Policy aligns with the UN Guiding Principles and includes recognition of Indigenous Rights. The Entity's Human Rights Due Diligence processes incorporate cultural and historical criteria to identify Indigenous communities and recommend early, culturally appropriate engagement. External expertise supports these efforts. Policies are publicly accessible, and reviews are triggered by new developments or knowledge gaps. Mapping emphasises cultural significance over legal boundaries, with strategies in place to enhance respectful communication and transparency.</p> <p>The Entity's Human Rights Policy is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</a></p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable to the Entity, as no New Projects or Major Changes took place within the last three years nor are any currently planned.</p> <p>Alcoa Corporate is committed to responsible engagement with Communities, including Indigenous Communities, and is developing a formal engagement approach aligned with the International Council on Mining and Metals (ICMM) Position Statement on Indigenous Peoples and Mining, which includes implementing Free, Prior, and Informed Consent (FPIC) processes where required.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes took place within the last three years nor are any currently planned.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has not identified any impacts from its projects on cultural or sacred heritage or tribal lands. The Entity has engaged identified Indigenous Peoples in its Area of Influence regarding its activities. The Entity has conducted a Human Rights Due Diligence process to identify risks and mitigation actions.

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as there are no projects identified that may impact cultural or sacred heritage.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as there are no projects where physical and/or economic displacements of people is required.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity maintains a Social Impacts Table to monitor key environmental, health, and social issues related to its operations. Each identified impact is linked to a plan to reduce or manage the impact whilst keeping the public informed. The Entity tracks the performance of these actions using an internal dashboard and by receiving Community feedback through various channels.</p> <p>The Social Impacts Table was developed with input from the Community and feedback is provided through regular Community Advisory Board (CAB) meetings and sessions including the Social Performance Workshop. The Social Impacts Table is reviewed regularly.</p> <p>The Entity works with schools, colleges, and local organisations to provide learning and work opportunities such as internships, job shadowing and project support.</p> <p>The latest version of the Social Performance Plan is shared publicly during CAB meetings and through local engagement channels. Key points are also posted in dashboards or community updates to ensure transparency. Key local commitments with Communities are disclosed in the annual Sustainability Report available at: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	<p>The Entity implements the Alcoa Corporate Trace International (TRAC) Program. The Entity engages with Trace International to support their Due Diligence program and further manage risks in the supply chain related to Bribery and Corruption, trade Compliance, Child and Slave Labour, criminal history, Human Trafficking and conflict minerals. TRAC screens suppliers against watch lists and for international sanctions, criminal acts and bankruptcy.</p> <p>Alcoa Corporate's Supplier Standards and Standard Terms and Conditions further describe the Entity's expectations of suppliers.</p> <p>The Entity has no operations in areas of active conflict. The Entity adheres to OECD guidance on Conflict-Affected and High-Risk Areas (CAHRAs) and specific countries.</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity identifies and assesses risks regarding CAHRAs using a structured methodology through the Ecovadis Platform for the qualification of suppliers. There is no minimum monetary business level applied. Risks are identified for each contractor depending on its physical locations and activities.</p> <p>The Entity follows OECD guidance regarding CAHRAs and specific countries. The methodology used is described in detail in the Alcoa Due Diligence Program.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity identifies and assesses risks regarding CAHRAs using a structured methodology through the Ecovadis Platform for the qualification of suppliers. There is no minimum monetary business level applied. Risks are identified for each contractor depending on its physical locations and activities.

CRITERION	RATING	COMMENT
		When a potential supplier operates in a CAHRA, it is systematically rejected as a supplier. The methodology used is described in detail in the Alcoa Due Diligence Program.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Alcoa Supplier Sustainability Program describes the Due diligence process for Responsible Sourcing, available: <a href="https://www.alcoa.com/global/en/contact/supplier#supplier-sustainability-program">https://www.alcoa.com/global/en/contact/supplier#supplier-sustainability-program</a></p> <p>The Entity reports on its Due Diligence process annually in the Sustainability Report available at: <a href="https://www.alcoa.com/sustainability#Policies">https://www.alcoa.com/sustainability#Policies</a></p>
9.9 Security practice	Conformance	<p>The Entity has an agreement with a third-party contractor for the management of access to the Facility. The contracting firm is an internationally-recognised security agency, and their mandate is to operate to the Entity's standards. The use of force or any restraining method is prohibited.</p> <p>The Audit included an inspection of the security arrangements and did not identify any indication of facilities used to restrain or physically engage persons.</p>
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity supports the Freedom of Association and Collective Bargaining. A Collective Bargaining Agreement is in place and is valid to May 2026. Union representatives are granted paid time for negotiations, and a formal complaint mechanism is in place. Non-Unionised staff benefit from comparable conditions outlined in the Unionised employees' handbook. These practices reflect the Entity's commitment to fair and transparent Labour relations across its workforce.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable as Applicable Law allows the Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	<p>The Entity adheres to minimum age employment standards as required under Applicable Law. Employment eligibility procedures include age verification through official documentation, and records are maintained.</p> <p>The Entity has committed to avoid Child Labour through its Code of Conduct and Ethics, pages 30 and 34, available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</a></p> <p>Subcontractors and suppliers are also required to adhere to minimum age standards.</p>



CRITERION	RATING	COMMENT
10.3a-c Forced Labour	Conformance	<p>The Entity demonstrates alignment with International Standards on the prevention of Forced Labour through the implementation of comprehensive corporate policies, including the Code of Conduct and Ethics, Supplier Standards, and the Human Rights Policy. These documents are publicly accessible and explicitly prohibit any form of Forced Labour: <a href="https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf">https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</a> and <a href="https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf">https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf</a> and <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</a></p> <p>At the Facility level, these commitments are operationalised through internal recruitment and onboarding practices. No third-party recruitment agencies are used, and no original personal documents are retained at any stage of employment.</p> <p>Additional transparency is provided through public reporting, and included in the Sustainability Report: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></p> <p>The Entity's Modern Slavery Statement is available at: <a href="https://www.alcoa.com/sustainability/pdf/2024-Modern-Slavery-Statement.pdf">https://www.alcoa.com/sustainability/pdf/2024-Modern-Slavery-Statement.pdf</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity demonstrates adherence to non-Discrimination principles through the implementation of an Equal Employment Opportunity Policy and Compliance with Applicable Law. Discrimination of any kind is prohibited, and structured procedures are in place to allow for the confidential reporting and investigation of related concerns, as outlined in the Discrimination, Harassment, and Bullying-Free Workplace Policy.</p> <p>Employment practices, including hiring, are designed to ensure fairness, with decisions made collectively to reduce the risk of bias. Diversity and inclusion are supported through employee resource groups and engagement tools, including networks for under-represented communities. These practices are reinforced by the Entity organisation's Code of Conduct, which promotes a respectful, inclusive, and legally compliant work environment.</p>
10.5 Communication and engagement	Conformance	<p>The Entity maintains multiple accessible channels to ensure two-way communication with employees and their representatives, reinforced by an Anti-Retaliation Policy. These channels include an annual employee survey, quarterly progress updates and a monthly newsletter covering production, Health and Safety, environmental performance and other site matters.</p> <p>In line with applicable Labour agreements, the Entity operates a formal grievance procedure that supports open communication and direct engagement on working conditions and compensation, ensuring that all concerns are addressed without fear of reprisal, intimidation or Harassment.</p>
10.6a-g Violence and Harassment	Minor Non-Conformance	<p>The Entity has established formal Harassment and Bullying-Free and Violence in the Workplace Policies, last updated in 2023 in accordance with the mandated five-year review cycle. The most recent version of the Policy is publicly accessible on plant policy boards and on the</p>

CRITERION	RATING	COMMENT
		<p>Entity website at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/harassment-bullying-free-workplace">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/harassment-bullying-free-workplace</a></p> <p>Mandatory training on workplace Violence and Harassment was completed by both hourly and salaried employees. The Entity also maintains visible '24/7 Integrity Line' posters across the site, offering confidential reporting channels.</p> <p>However, the current EH&amp;S risk register does not include specific entries for workplace Violence, Harassment or broader psycho-social hazards, and these risks have not been formally integrated into the Entity's Occupational Health &amp; Safety (OH&amp;S) Management System.</p>
10.7a-c Remuneration	Conformance	<p>The Entity ensures fair, timely, and legally compliant compensation practices for all employees. Unionised Workers are compensated according to the terms outlined in a Collective Bargaining Agreement (CBA), which is renegotiated every three years.</p> <p>Compensation for non-Unionised personnel is determined through market data analysis and internal salary benchmarking. All employees receive wages in legal currency, on time, and in accordance with New York State wage and hour laws.</p> <p>Remuneration levels exceed minimum wage thresholds and are designed to meet essential living needs while also allowing for discretionary income. Compensation practices for both Union and non-Union employees are defined and documented.</p>
10.8a-c Working Time	Conformance	<p>The Entity demonstrates conformance with legal requirements related to Working Time, including provisions for Overtime, public holidays and paid annual leave. Procedures are implemented in accordance with applicable state Labour laws. Working time conditions for Unionised personnel are defined by the local Collective Bargaining Agreement (CBA), which specifies entitlements including paid leave and holidays.</p> <p>Compliance is supported through objective documentation, including the CBA Handbook and records showing ongoing adherence to statutory Labour standards.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity demonstrates conformance with Labour Rights requirements by upholding employees' Rights to Freedom of Association and Collective Bargaining, in alignment with the U.S. National Labor Relations Act (NLRA). These rights are respected without interference and are supported by clear internal policies.</p> <p>Protection against Forced Labour is also ensured through established procedures and accessible reporting mechanisms. These commitments are outlined in the Alcoa Code of Conduct and are reinforced through onboarding and mandatory annual training.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity's Occupational Health and Safety (OH&S) Management System is ISO 45001:2018 certified and is in conformance with the Alcoa Corporate EH&S Management System Standards.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity's OH&S Management System audits are planned and conducted in accordance with the corporate schedule. When gaps are identified, 'time-bound' action plans are documented, addressed and the Management System is modified accordingly. Performance

CRITERION	RATING	COMMENT
		<p>indicators are measured, reported and monitored through the Alcoa Corporate PowerBI dashboard.</p> <p>The effectiveness of the Management system is disclosed in the annual Sustainability Report including leading and lagging indicators and a comparative analysis of performance with peer companies available at: <a href="https://www.alcoa.com/sustainability/en">https://www.alcoa.com/sustainability/en</a></p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented monthly joint Health and Safety Committee meetings that encompass numerous management individuals and is open to all Union employees for participation.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	2 March 2022	Initial Certification Audit – Provisional Certification
1	27 July 2022	Surveillance Audit – Full Certification
2	19 August 2025	Re-Certification Audit and Scope Change – Full Certification. Scope Change to apply Performance Standard V3.1.