

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Alcoa San Ciprián Smelter

CERTIFICATE NUMBER

39

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

18 JULY 2025

DATE OF EXPIRY

17 JULY 2028

CERTIFIED SINCE

18 JULY 2019

AUTHORISED BY

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

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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

CERTIFICATION SCOPE

Alcoa San Ciprián Smelting (Spain),
including baking furnace and
administrative facilities.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa San Ciprián Smelter
CERTIFICATION SCOPE	Alcoa San Ciprián Smelting (Spain), including baking furnace and administrative facilities.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit (6 – 10 May 2019)Re-Certification Audit (23 – 26 May 2022)Re-Certification Audit and Scope Change (19 – 21 May 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">6 – 10 May 2019 (Certification Audit)23 – 26 May 2022 (Re-Certification Audit)19 – 21 May 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">2 July 2019 (Certification Audit)1 July 2022 (Re-Certification Audit)1 July 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (6 – 10 May 2019)</u></p> <p>The Audit Scope included the Alcoa San Ciprián Smelting facility, including baking furnace and administrative 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> <p><u>Re-Certification Audit (23 – 26 May 2022)</u></p> <p>The Audit Scope included the Alcoa San Ciprián Smelting facility, including baking furnace and administrative Facilities.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses

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

Re-Certification Audit and Scope Change (19 – 21 May 2025)

The Audit Scope included the Alcoa San Ciprián Smelting (Spain) facility, including baking furnace and administrative 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	<ul style="list-style-type: none">• Certification
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AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD	18 July 2025 – 17 July 2028
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DATE	17 July 2028
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CERTIFICATE NUMBER	39
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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 San Ciprián Smelter ('the Entity') is a Primary Aluminium Smelting Facility, and includes a baking furnace, Casthouse and administrative facilities. The Entity is part of the Alcoa San Ciprián industrial complex, established in 1980 between the Lugo municipalities of Cervo and Xove. The Entity comprises of two distinct plants: the Primary Aluminium Smelter and the Alumina Refinery. The Alumina Refinery is not included in the Certification Scope and is incorporated into the Certification Scope of ASI Performance Standard Certificate 93. The San Ciprian Complex is 75% owned by Alcoa Corporation and 25% owned by IGNIDEQT, which acquired its interest in the Entity in April 2025.

Alcoa San Ciprián directly employs approximately 1,050 people of which approximately 600 work at the Aluminium plant. The Primary Aluminium plant has a production capacity of approximately 228,000 tonnes of Aluminium per annum. The Smelter's operations consist of a carbon plant, two potlines and a Casthouse with a substation that also provides energy to the Refinery. The electrolysis series temporarily shut down January 2021. The first phase of restart was in January 2024. A major power outage in April 2025 disrupted the operations and restart process. The current production at the smelter is less than 10% of capacity, and there is not currently a known timeline for a full restart. The Casthouse is still producing using residual material supplying customers in Spain and other European countries in the form of ingots for casting, billets for extrusion, and slabs for rolling.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a system to ensure legal Compliance. The system is supported by defined Policies and procedures to ensure risk identification and compliance with Applicable Law.
1.2 Anti-Corruption	Conformance	<p>The Entity has defined Policies and procedures to identify and manage risks of Corruption in all its forms, including Extortion and Bribery, in accordance with Applicable Law and International Standards.</p> <p>The Anti-Corruption Policy is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption.asp</p> <p>The Code of Conduct and Ethics is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct and Ethics covering all key aspects of the business, business activities, conflicts of interest, customer and supplier relations and Human Rights compliance. The Code has been defined and communicated to all Stakeholders. The Code of Conduct and Ethics is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established a Policy consistent with the Environmental, Social and Governance (ESG) practices included in the ASI Performance Standard. The Entity holds ISO 14001 and ISO 45001 Certifications. The Entity's Policies and documents related to ESG aspects are available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance</p> <p>https://www.alcoa.com/sustainability/en/environment-health-safety.asp</p> <p>The Entity's senior management supports the implementation of the ESG Policies through the provision of resources and periodic reviews.</p> <p>The Entity communicates its ESG Policies both internally and externally.</p>
2.2a-c Leadership	Conformance	The Entity has nominated senior Management Representatives as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has an Environmental Management System and holds a valid ISO 14001:2015 Certificate.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has a Social Responsibility Management System that involves and promotes the participation of internal and external Stakeholders.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	The Entity has a responsible sourcing programme as part of its procurement process. The programme identifies and monitors suppliers, promoting improvement action plans when high-risk levels are identified. The Entity integrates environmental, health and safety assessment criteria into its supplier selection process. The Policies are available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/supplier-standards
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity has conducted Impact Assessments, including assessments of Human Rights and environmental and social impacts. There have been no New Projects or important changes since the Entity joined ASI apart from the interruption of normal operations due to the smelter shutdown.</p> <p>The Entity communicates the outcome of its risk assessments in Non-Financial Information Report available at: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity has conducted Impact Assessments, including assessments of Human Rights and environmental and social impacts. There have been no New Projects or important changes since the Entity joined ASI apart from the interruption of normal operations due to the smelter shutdown.</p> <p>The Entity communicates the outcome of its risk assessments in Non-Financial Information Report available at: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p>
2.7a-f Emergency Response Plan	Conformance	The Entity has developed and implemented Emergency Response Plans with the participation of internal and external Stakeholders. The Plans are regularly tested through drills in coordination with external agencies, suppliers, and subcontractors. The Entity has valid ISO 14001:2015 and ISO 45001 certificates. The Emergency Response Plans are available at: https://ficheiros-web.xunta.gal/emexencias/plans/PEE_SanCibrao_gal.pdf
2.8a-d Suspended Operations	Conformance	<p>The Entity has implemented a Business Resilience Plan for the suspension of smelter operations. This plan has been communicated to the environmental authority. This plan contemplates and defines the actions to be taken to eliminate or reduce material adverse environmental, social and governance impacts.</p> <p>There is evidence of compliance with the plan, such as operational maintenance of facilities and maintenance of employee employment.</p> <p>This plan is reviewed by a committee every 3 months and the monitoring results are communicated on the Entity's website: https://www.alcoa.com/spain/es/press-releases</p>
2.9a-b Mergers and Acquisitions	Conformance	The Entity has implemented adequate procedures and resources for mergers and acquisitions that address environmental, social and governance issues in its Due Diligence process.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has implemented an asset management procedure and policy which covers the entire Facility life cycle, including planning for the Facility 'end-of-life'. The Entity reviews relevant environmental,

CRITERION	RATING	COMMENT
		social and governance issues in the planning process for closure, decommissioning, and divestment.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's ESG performance is incorporated into the Alcoa Group's Sustainability Report. The Sustainability Report is prepared in accordance with Global Reporting Initiative (GRI) Guidelines, and is publicly available at: https://www.alcoa.com/sustainability
3.2 Non-compliance and Liabilities	Conformance	The Entity has not received any significant fines, judgments, penalties, or non-monetary sanctions for non-Compliance with Applicable Laws. The Entity has procedures to report non-Compliances internally and publicly in Annual and Quarterly Reports: http://investors.alcoa.com/sec-filings https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf
3.3a-c Payments to Governments	Conformance	The Entity has policies and processes to ensure payments to governments are in accordance with applicable legal requirements.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented mechanisms to receive complaints, claims and requests from Stakeholders, including via the contact section on the Entity's website and its integrity line: https://www.alcoa.com/global/en/contact https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line The Entity's certified ISO 14001 and ISO 45001 Certified Management Systems cover the management of complaints, claims and requests for information from Stakeholders.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its major Product lines and developed a Life Cycle Assessment (LCA) Report which includes the impacts from the raw material supply, transportation to the manufacturer and manufacturing stages. The Entity publishes life cycle impact information for its Products and process innovations derived from the LCA Report in its Sustainability Report, page 29: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity provides 'cradle-to-gate' LCA information on its Aluminium Products. The LCA Reports are available upon request. The Entity publishes life cycle impact information for its Products and process innovations derived from the LCA Report in its Sustainability Report, page 29: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf The Entity has published information related to its environmental impacts on its website at: https://www.alcoa.com/global/en/what-we-do/aluminum/smelting/default.asp
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has implemented an Aluminium Process Scrap recycling plan and controls to minimise Scrap generation are in place. 100% of the Aluminium Scrap from production processes is recycled internally, except for process Slag. The only Aluminium Scrap shipped from the Facility includes casting filters that contain some Aluminium, which are sent to a third party to recover the Aluminium.</p> <p>The Entity has implemented a Waste management system that separates Aluminium alloys and grades for recycling.</p>
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity holds a relevant licence to facilitate a 'closed-loop' process with customers and other external agents to return Aluminium Scrap, non-ferrous metal filings and anode fragments from their operations to be reused.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity discloses Greenhouse Gas (GHG) emissions and energy use data in several locations. The Entity publishes its Scope 1 emissions at a Facility level in the in Non-Financial Information Report available at: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p> <p>The Entity's parent company has published its corporate GHG emissions, Scope 1, 2 and 3, and energy use by source in the annual Sustainability Report and the linked Databook at: https://www.alcoa.com/sustainability</p> <p>The Sustainability Report contains a statement of independent verification of the GHG emissions data.</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity. There are no plans for starting new smelters in the near future.
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 below 11 tonnes CO ₂ e/metric tonne of Aluminium. The Entity has reduced its emissions intensity by 67% from 2021 to 2024.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has established systems for setting GHG emissions reduction targets and implementing action plans to achieve the targets. Facility level GHG and energy data are reported to Alcoa Corporate on a monthly basis. The Entity has developed a Facility level GHG Emissions Reduction Plan for their Scope 1, 2 and 3 emissions and have validated their emissions reduction pathway using the ASI GHG Emissions Reduction Pathway methodology. The Entity's GHG emission reduction targets align with those defined at the Alcoa Corporate level and published in the Sustainability Report, pages 14 and 80: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p>

CRITERION	RATING	COMMENT
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity has established systems for setting GHG emissions reduction targets and implementing action plans to achieve the targets. Facility level GHG and energy data are reported to Alcoa Corporate on a monthly basis. The Entity has developed a Facility level GHG Emissions Reduction Plan for their Scope 1-3 emissions and have validated their emissions reduction pathway using the ASI GHG Emissions Reduction Pathway methodology. The Entity's GHG emission reduction targets align with those defined at the Alcoa Corporate level and published in the Sustainability Report, pages 14 and 80: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
5.4 GHG Emissions Management	Conformance	The Entity has implemented an ISO 14001 Certified Environmental Management System, which addresses aspects related to GHG emissions and controls. Emissions are monitored and reported as part of the monthly environmental report. The Entity's Management team is updated on the status of GHG emissions through review meetings. At the operational level, GHG emissions are measured and monitored by the operational departments.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has procedures and a methodology to determine its emission sources. Emissions sampling is performed by an external company. The Entity holds an emissions permit and complies with the limits set by the relevant regulatory authority. The Entity continuously reports its Emissions to Air and actions plan in the Non-Financial Information Report, page 56: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf
6.2a-g Discharges to Water	Conformance	The Entity has implemented an Environmental Management System in accordance with ISO 14001 and has established a procedure for the Control of Potential Soil and Groundwater Contamination. The Entity has identified its water and wastewater flows. The Entity has quantified and reported its Discharges to Water. The discharge data is available in the Non-Financial Information Report, page 68: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf In addition, the water discharge data is reported to the local authority every six months.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has procedures for the prevention and control of Spills and the management of environmental risks and incidents. The Entity has conducted a risk analysis of operations in which Spills and Leakages may contaminate air, water and/or soil. The Entity publishes the actions for the prevention and control of Spills and Leakages in the Non-Financial Information Report, pages 55 and 68: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf In addition, data on the performance of the Spills and Leakages Control Plan is reported to the local authority on an annual basis.

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has adequate systems for the immediate notification and disclosure of major Spills. The Entity has implemented a Spill reporting procedure that includes the Spill volume and potential contamination.</p> <p>The Entity has implemented a system to record Spills and provides appropriate information to the agencies involved in accordance with legal and permit notification requirements. Information on Spills is available in the Sustainability Report, page 106: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste management strategy according to the Waste Mitigation Hierarchy. The Entity has a Non-Hazardous and Hazardous Waste minimisation plan and a Waste report that is submitted to the relevant authorities. All Waste types in tanks and containers are accumulated, stored, labelled, inspected, and permitted/licensed/authorised as required, or according to leading management practices.</p> <p>The Entity has published its inventory of Hazardous and Non-Hazardous Waste generated and associated Waste disposal methods in the Sustainability Report, page 103: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p> <p>In Spain, the Entity publishes its Facility level results in the Non-Financial Information Report, page 63: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p> <p>The Entity reports its site-specific Waste management results annually to the relevant regulatory authority.</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 stores Spent Pot Lining (SPL) in a dedicated warehouse that complies with legal requirements. There has been no spillage of untreated or treated SPL.</p> <p>The Entity sends 100% of SPL to an external and authorised recycler to optimise the recovery of any carbon and refractory material. There is no untreated SPL landfilled or stockpiled at the Alcoa San Ciprián Facility, nor any discharge of SPL to marine or aquatic environments.</p>
6.8a-d Dross	Conformance	The Dross produced by the Entity is sent to an authorised external company to maximise the recovery of Aluminium from Dross and Dross residue. 100% of the Dross transported is recycled and recovered. There is no landfilling of Dross residues at the Alcoa San Ciprián Facility.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified its water input and output flows, sources, and destinations. The Entity's water assessment covered the Entity's Area of Influence and concluded that the Entity is not located within a water risk area. The Entity maintains maps of waterways in the area. The Entity holds a valid ISO 14001 certificate.</p> <p>The Entity identifies, documents, and publicly discloses its water withdrawal and use by source and type annually in the Non-Financial</p>

CRITERION	RATING	COMMENT
		<p>Information Report, page 68: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p> <p>In addition, data on water management is communicated to the local authority on an annual basis.</p>
7.2a-e Water Management	Conformance	<p>The Entity's water assessment determined there were no Material risks to water. However, the Entity has developed and implemented a Water Management Policy, where it has established a programme of measures to improve water use efficiency, following the Entity's strategic objective to reduce the intensity of total water use in water-scarce locations by 5% by 2025 and 10% by 2030.</p> <p>The Entity's strategy on water management is published in the Sustainability Report, page 107: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p> <p>The Entity's strategy in Spain on water management is published in the Non-Financial Information Report, page 68: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has conducted a Biodiversity study in accordance with the Biodiversity Mitigation Hierarchy and identified the main risks and impacts on Biodiversity within its defined Area of Influence.</p> <p>The Entity's biodiversity analysis concludes that all identified impacts on the physical environment present a low risk. With regard to the biotic environment, the introduction of diseases (flora and fauna) also presents a low risk, while the remaining impacts are moderate. The most significant impacts on Biodiversity occurred during the construction phase of the various facilities in the Area of Influence. Currently, the probability of occurrence of the negative impacts identified is considered mostly unlikely. The impacts associated with the alteration of water quality and the hydraulic system, as well as the introduction of invasive species (flora and fauna) and diseases (flora and fauna), are considered rare (they only occur in special circumstances). The mortality or loss of fauna populations (impact associated with the power line) and wildlife roadkill (impact associated with road traffic) are considered possible.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	<p>The Entity has carried out a Biodiversity risk assessment report. The risk assessment concludes that the Entity does not contribute to impacts on Ecosystems.</p>
8.2a-g Biodiversity Management	Conformance	<p>The Entity's Biodiversity Plan has defined objectives and a series of management actions. The Entity monitors the effectiveness of the Biodiversity Plan through Key Performance Indicators (KPIs) and the follow-up of planned actions.</p> <p>The Entity's Biodiversity Plan was developed in consultation with external and internal Stakeholders and identifies risks and impacts. The study uses the protection figures defined by current legislation and correlates them with the High Conservation Values (HCV) methodology.</p>

CRITERION	RATING	COMMENT
		<p>The Entity's Biodiversity objectives and action plan are published in the Non-Financial Information Report, page 77: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p>
8.3a-c Management of Priority Ecosystem Services	Conformance	<p>The Entity has prepared a Biodiversity risk assessment report. Potential impacts on Biodiversity-related components have been identified, which may be caused by different actions associated with the development of the Facility and its activities. The Priority Ecosystem Services of relevance to Affected Populations and Organisations are identified in the report, which concluded that the risks are low and there are no impacts identified.</p>
8.4 Alien Species	Conformance	<p>The Entity monitors the effectiveness of the Biodiversity Action Plan through KPIs and the follow-up of planned actions, including actions for the elimination and non-proliferation of Alien Species and protection of native species.</p> <p>Relevant actions are analysed and communicated in the Entity's Non-Financial Information Report, page 77: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	<p>The Entity has conducted a Biodiversity risk assessment report, which concludes that there are no World Heritage Sites or Properties in its Area of Influence.</p>
8.6a-d Protected Areas	Conformance	<p>The Entity has prepared a Biodiversity risk assessment report. The report concludes that the Entity neither contributes to nor can cause impacts to Protected Areas, in accordance with Applicable Law.</p>
8.6e Protected Areas - Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
8.7a-i Mine Rehabilitation	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has a developed and implemented gender-responsive Human Rights Policy that addresses Child Labour, Freedom of engagement, equal opportunity, compensation, Freedom of Association, and relationships with Indigenous Peoples. It is aligned with the United Nations (UN) Guiding Principles on Business and Human Rights.</p> <p>The Human Rights Policy is available at: 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/pdf/human-rights-policy/human-rights-policy-es.pdf</p> <p>The Entity has developed and implemented a Code of Conduct that includes Human Rights compliance issues: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p> <p>The Entity has implemented a gender-responsive Human Rights Due Diligence process following the model established by the Danish</p>

CRITERION	RATING	COMMENT
		<p>Institute for Human Rights. The strategy, objectives and actions plan are published in the Sustainability Report, page 62: https://www.alcoa.com/sustainability</p> <p>In Spain, the Entity's Due Diligence process is consistent with Corporate guidelines and the Entity has a Human Rights risk assessment tool and has developed an associated action plan. The results of the assessment concluded that there are no very high risks, except for gender discrimination, which is qualified as an inherent risk. Actions to mitigate this risk are implemented. The results of the action plan are published in the Entity's Non-Financial Information Report, page 120: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented an Equal Employment Opportunity Policy which includes a commitment that employees, contractors, and applicants should not be discriminated against based on gender: https://www.alcoa.com/global/en/careers/pdf/Alcoa-EEO.pdf</p> <p>The Entity has implemented a Code of Conduct and Ethics that establishes a commitment to combat Harassment of women: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p> <p>The Entity has a Collective Bargaining Agreement that establishes the conditions for effective equality between people, including women's rights. The Entity has implemented an equality plan that includes an ordered set of measures aimed to achieve equal treatment and opportunities between women and men and eliminate Discrimination based on sex.</p> <p>In Spain, the Entity's performance against the equality plan is available in the Non-Financial Information Report, page 85, and are also communicated to the authorities. This Report concludes that there are no relevant residual risks. The Report is available at: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
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 as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	There are no places classified as cultural or sacred heritage in the location or vicinity of where Entity operates, nor were there at the time of construction of the plant in the 1970s.

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity there have been no projects or activities by the Entity that required resettlement, displacement or land acquisition.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity's parent company has implemented a Corporate Stakeholder Engagement Process to ensure positive Stakeholder relationships and effective means for resolving Community and Affected Populations and Organisations concerns. The Entity has implemented the Corporate requirements and has developed an annual Stakeholder Engagement Plan.</p> <p>The Entity has explored opportunities with the Local Communities and affected Populations and Organisations to respect and support their livelihoods. Numerous social and environmental actions and projects were delivered by the Entity to support the livelihoods of Local Communities, with Stakeholders providing a positive evaluation.</p> <p>The Entity publishes its impact on communities in the Non-Financial Information Report, page 145: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	<p>The Entity has demonstrated that it does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs), in alignment with the Human Rights Policy and Human Rights Program.</p> <p>The Audit further verified the Entity completed the identification and evaluation of Due Diligence in Human Rights according to the OECD Guidance. The Entity demonstrated appropriate control actions are evident, and the responsibilities and resources, information gathering and supplier engagement.</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity demonstrated that, in alignment with the Human Rights Policy, it has completed the identification and evaluation of Due Diligence in Human Rights according to the OECD Guidance. The Entity concluded that there are risks in some countries and control actions are implemented for those instances.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity demonstrated that, in alignment with the Human Rights Policy, it had completed the identification and evaluation of Due Diligence in Human Rights according to the OECD Guidance. The Entity concluded that there are risks in some countries and control actions are implemented for those instances, based on the design and implementation of a strategy to respond to the identified risks.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>The Entity demonstrated that, in alignment with the Human Rights Policy, it had completed the identification and evaluation of Due Diligence in Human Rights according to the OECD Guidance.</p> <p>This ASI Performance Standard Audit satisfies the requirements of this Criterion.</p>

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>The Entity reports the results of its supply chain Due Diligence on its website and in its Sustainability Report, page 33: https://www.alcoa.com/global/en/contact/supplier https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p>
9.9 Security practice	Conformance	<p>The Entity maintains a contract with a specialised security company, in accordance with the Entity's Corporate standards and Spanish legislation. The Entity has adequate procedures for compliance with Human Rights, including monitoring of security activities.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity has a Works Council made up of internal members and Trade Union delegates. Trade Union elections are held in accordance with Applicable Legislation and Workers can and have the right to freely associate with Trade Unions and vote in elections.</p> <p>The Entity has a Collective Bargaining Agreement which is negotiated and agreed upon with the Works Council. The current agreement is effective from 1 January 2020 to 31 December 2025.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	<p>This Criterion is not applicable to the Entity, as in Spain there is no legislation that restricts the right to Freedom of Association and Collective Bargaining.</p>
10.2a-c Child Labour	Conformance	<p>The Entity has implemented its Corporate Human Rights Policy and does not employ Workers under 18 years of age: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</p> <p>The Entity does not support the use of Child Labour in the supply chain and implements general conditions of procurement and the Code of Conduct and Ethics: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p> <p>The Entity's Corporate Human Rights Policy prohibits the use of Child Labour and the Environmental, Health and Safety Policy requires employees to work safely. The Entity does not support the use of Child Labour in the supply chain and implements general conditions of procurement and the Code of Conduct and Ethics.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has implemented a Corporate Human Rights Policy that prohibits Forced Labour and Human Trafficking: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy</p> <p>The Entity does not require any deposits, recruitment fees or equipment advances from Workers directly or through employment or recruitment agencies. All employees have the right to work in a respectful and safe environment and employees have Trade Union representation and are covered by the Law and Collective Bargaining Agreement. All employees have legal contracts and are registered with social security.</p> <p>The Entity does not hold employees in Debt Bondage or force them to work to pay off a debt. In no case is any Worker obliged to pay any</p>

CRITERION	RATING	COMMENT
		<p>debt outside of what is defined in the Collective Bargaining Agreement.</p> <p>The Entity does not unreasonably restrict employees' freedom of movement in the workplace or on-site housing. Contractors working in the Entity have freedom of movement, according to the general conditions of procurement. The Entity does not unlawfully retain the documents of any employee.</p> <p>Employees are covered by the terms of the employment contract and are free to terminate their contract at any time, subject to contract terms and Applicable Law.</p> <p>The Entity has defined and published a Statement on Modern Slavery on its website at: https://www.alcoa.com/sustainability/pdf/2024-Modern-Slavery-Statement.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has in its Collective Bargaining Agreement specific measures to ensure fairness at work. The Entity has a committee (Equality Commission) inclusive of Trade Union representatives, that holds regular meetings to review information on Discrimination and as a place to raise potential breaches of the Code of Conduct. The Entity reports its equality performance to the authorities in the Non-Financial Information Report: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented relevant Policies and has held frequent meetings established under the Collective Bargaining Agreement to deal with any Labour issues. Numerous committees have been established to ensure communication and engagement, including the Interpretation and Surveillance Committee, Training and Evaluation Committee, Sustainability Committee, Equality Committee and Social Care Committee.</p> <p>Employees can directly approach Human Resources or their Union representatives to discuss any issues. The Entity has implemented spaces and systems to promote communication and engagement with employees.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established policies and procedures on Violence and Harassment in accordance with the Metal Sector Workplace Code of Conduct and Ethics and in line with the Collective Bargaining Agreement.</p> <p>Sanctions or disciplinary measures are applied in accordance with the Collective Bargaining Agreement and Spanish Law. The Code of Conduct and Ethics is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p>
10.7a-c Remuneration	Conformance	<p>The Entity has a Collective Bargaining Agreement for staff Remuneration. Remuneration conditions exceed those established in the sectoral agreement (Metal Sector Agreement) and the minimum salary established in Spain.</p> <p>The Entity pays wages monthly. Workers receive documentation of their payroll receipt in accordance with Applicable Law.</p>
10.8a-c Working Time	Conformance	<p>The Entity has established through the Collective Bargaining Agreement the number of annual working hours, rest hours, shift</p>

CRITERION	RATING	COMMENT
		schedules and the legal limit of Overtime for each employee. The Entity has implemented processes to control working hours and ensure Compliance with the Collective Bargaining Agreement and Spanish legislation.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their rights through the Code of Conduct and Ethics and through established communication channels, including the Works Council and the Trade Unions, which all employees are free to join. The Entity ensures that all employees are aware of their Rights through the Welcome Manual, which is provided to all employees upon joining the Entity and is posted on the intranet.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has a certified ISO 45001 Occupational Health and Safety (OH&S) Management System, which is audited internally and externally on an annual basis. The Entity has a Joint Prevention Service that includes senior occupational risk prevention technicians. The Entity has an emergency plan and conducts annual drills. The OH&S Management System includes various tools to assess the risks of its Workers and subcontractors, in addition to coordinating business activities.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity monitors its OH&S Management System performance on an annual basis in a management review process. The Health and Safety Committee reviews the most relevant aspects of Health and Safety every quarter. The Entity's OH&S Management System is audited annually by an independent third party. The Entity also conducts internal audits on an annual basis. The Entity assesses Health and Safety risks and updates them whenever there are changes in the Facilities or working conditions. Psychosocial risk assessment and hygiene measurements are included.</p> <p>At the corporate level, the Entity publicly discloses the effectiveness of the OH&S Management System annually in the Sustainability Report, including leading and lagging indicators and a comparative analysis of performance with peer companies and best practices. The information is available in the Sustainability Report, page 43: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p> <p>In addition, at the country level the Entity publicly discloses the effectiveness of the OH&S Management System on an annual basis in the Non-Financial Information Report, page 104: https://www.alcoa.com/spain/es/pdf/memoria-informacion-no-financiera-2023.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has a certified ISO 45001 Occupational Health and Safety (OH&S) Management System and has various committees and subcommittees for engagement on Occupational Health and Safety issues. All meetings are documented, and action plans are established. Workers can freely report risks through an internal platform which are tracked. The Entity has implemented and monitors specific indicators and targets for participation and commitment to health and safety by employees and subcontractors.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	18 July 2019	Initial Certification Audit – Full Certification
1	25 July 2022	Re-Certification Audit – Full Certification
2	6 August 2025	Re-Certification Audit and Scope Change – Full Certification. Scope Change to apply Performance Standard V3.1. Correction to Rev 1 Document Control table to reflect Audit Type as ‘Re-Certification Audit’