

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Alcoa Corporation

CERTIFICATE NUMBER  
218

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3.1 2023)

CERTIFICATION  
LEVEL  
FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM  
DNV BUSINESS  
ASSURANCE  
SERVICES UK LTD.

DATE OF ISSUE  
15 FEBRUARY 2024

DATE OF EXPIRY  
14 FEBRUARY 2027

CERTIFIED SINCE  
23 AUGUST 2022

## AUTHORISED BY

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

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

Corporate programs, policies and  
procedures at Alcoa Corporate  
Head Office in Pittsburgh, USA.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa Corporation
CERTIFICATION SCOPE	Corporate programs, policies and procedures at Alcoa Corporation Head Office in Pittsburgh, USA.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li><li>• Semi-Fabrication</li></ul>
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none"><li>• Initial Certification Audit (19 – 22 April 2022)</li><li>• Re-Certification Audit and Scope Change (2 – 11 October 2023)</li><li>• Surveillance Audit (2 – 11 June 2025)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>• 19 – 22 April 2022 (Initial Certification Audit)</li><li>• 2 – 11 October 2023 (Re-Certification Audit and Scope Change)</li><li>• 2 – 11 June 2025 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 30 June 2022 (Initial Certification Audit)</li><li>• 15 December 2023 (Re-Certification Audit and Scope Change)</li><li>• 16 August 2025 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (19 – 22 April 2022)</u></p> <p>The Audit Scope included the corporate programs, policies and procedures at Alcoa Corporation Head Office.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Bauxite Mining</li><li>• Alumina Refining</li><li>• Aluminium Smelting</li><li>• Aluminium Re-melting/Refining</li><li>• Casthouses</li><li>• Semi-Fabrication</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (2 – 11 October 2023)</u></p>

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The Audit Scope included the corporate programs, policies and procedures at Alcoa Corporate Head Office.

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

Surveillance Audit (2 – 11 June 2025)

The Audit Scope included the corporate programs, policies and procedures at Alcoa Corporate Head Office.

Supply chain activities included in the Audit Scope:

- Bauxite Mining
- Alumina Refining
- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

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AUDIT OUTCOME

- Certification

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AUDIT METHODOLOGY  
DECLARATION

The Auditors confirm that:

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

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CERTIFICATION PERIOD

15 February 2024 – 14 February 2027

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NEXT AUDIT TYPE

Re-Certification Audit

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NEXT AUDIT DATE

14 February 2027

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CERTIFICATE NUMBER

218



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.

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

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## ENTITY OVERVIEW

Alcoa is a global leader in Bauxite Mining, Alumina Refining and Aluminium smelting and casting. With operations on six continents, Alcoa has a workforce of more than 13,000 employees. Alcoa’s activities commenced in 1886, with the discovery of a commercial process that allowed Aluminium to be produced economically.

The Company is organised in two business segments: Alumina and Aluminium. The Alumina segment includes the global Bauxite mines and the Alumina refining assets. Alcoa is one of the world’s largest Bauxite miners, with active mines in Brazil and Australia. It also operate the world’s largest third-party Alumina business, with six refineries on three continents. Alcoa’s Aluminium segment includes Aluminium smelting, casting and the majority of its energy assets.

The Alcoa Corporate Head Office (the ‘Entity’) referred to in this Audit Report consists of the Alcoa corporate programs, policies and procedures that support the operational sites and there are no operational sites included in this Certification.

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

## FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented regionally organised teams of lawyers and also enlists the support of outside counsel for specific countries and expertise. It utilises a range of inputs including through local knowledge and community engagement activities to understand Customary Law and has defined procedures and Policy to manage any conflicting requirements.
1.2 Anti-Corruption	Conformance	<p>The Entity has defined an Anti-Corruption Policy as part of its suite of Policies and Procedures to ensure implementation, which is 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></p> <p>The Entity has identified and categorised the highest risk activities and roles, which includes working with intermediaries. There are additional Due Diligence and monitoring requirements for these circumstances. The Entity supports implementation through training records, a corporate grievance mechanism and location-specific mechanisms that vary by site.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has published a Code of Conduct, which was last updated in 2022. It is subject to regular review as per the corporate work instruction and this is tracked, and changes are made where a trigger is noted. The Code of Conduct is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</a></p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has a broad and expanding range of targeted Environmental, Social and Governance (ESG) Policies that reflect the impacts, risks and opportunities facing the Business and define its corporate approach. There is a documented overarching process which determines review and governance requirements of policy setting. Core Policies are publicly available, and all Policies are posted on the intranet and supported by communication and awareness activities. Awareness of ESG Policies is supported through regular training.
2.2a-c Leadership	Conformance	The Entity has developed a clear structure of responsibilities for implementation of the Policies as evidenced through structural diagrams in corporate presentations and through testimonials. There are acknowledged challenges in recruiting and retaining the full range of people required to implement these Policies and the ASI Performance Standard requirements from Corporate to local level, however evidence confirmed that the Entity has increased resources over recent years to ensure adequate management of high risk areas.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity implements a systematic approach to environmental management via a third party certified (ISO 14001) Environmental Management System.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has developed and implemented Social Management Systems and is in the process of simplifying its four key standards into one Social Performance Management Standard to improve ease of implementation at the regional level. New systems to enhance the tracking and effectiveness of Community and Stakeholder engagement are being implemented at the regional level. The Entity is also appointing persons at each site to increase social performance capacity at the operating sites.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing programme that aligns with ASI Principles and includes a publicly disclosed Policy, Due Diligence procedures, and regular review mechanisms. Since the previous Audit, improvements have been made to extend responsible sourcing controls to non-procurement-led suppliers and to enhance digital integration for more efficient supplier risk management across the full value chain.
2.5a-g Environmental and Social Impact Assessments	Conformance	The Entity applies its Environmental and Social Impact Assessment (ESIA) standard to any significant changes, supported by a variety of internal procedures and tools. If public consultation is required, it is approved by the relevant country public affairs team and the facilitated by a location engagement advisor. The Entity are in the process of transitioning between the old system and SP360 – which is an enhanced social assessment and performance tracking tool.
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has implemented appropriate mechanisms to identify Human Rights impacts including a Human Rights Impact Assessment (HRIA) where there are New Projects or Major Changes. The Entity conducts a HRIA as part of broader Human Rights Due Diligence processes, involves Stakeholders in the assessments and publicly discloses outcomes as required.
2.7a-f Emergency Response Plan	Conformance	The Entity has Emergency Preparedness and Response Procedures (ERP's) and the relevant Policy meets the requirements. Meetings with Local Communities are held on emergency response and drill exercises are held. Publication of the ERP's is undertaken at a site level.
2.8a-d Suspended Operations	Conformance	<p>The Entity has demonstrated an effective approach to crisis management including monitoring, escalation process and communications, with a focus on acute, immediate risks.</p> <p>As part of its Enterprise Risk Management (ERM) process, climate impacts are being assessed from various perspectives within the business (e.g., biodiversity). Each operating site is responsible for the management of Business resilience planning for more long-term, strategic issues including water availability, flood risks and other ESG risks.</p>
2.9a-b Mergers and Acquisitions	Conformance	The Entity has provided evidence to demonstrate an enhanced Due Diligence process, which included additional environmental, social and governance criteria. There has been one recent acquisition. Providing information and developing plans with affected communities and populations is undertaken through the social engagement team facilitated via the Social Management System.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has developed decommissioning provisions for ESG practices for any closures and divestments which include both contractual and financial requirements. Consultation with Local Communities is a requirement and detailed communication plans are developed in the event of a site closure.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its Environmental, Social and Governance (ESG) approach, its Material impacts and the strategies and plans to manage them. The Entity's coverage of Material impacts has adjusted over time. Information is published on both its website and within the Annual Sustainability Report, which is Third Party verified: <a href="https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2022-Sustainability-Report.pdf</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity has publicly disclosed information on significant fines and sanctions through the U.S. Securities and Exchange Commission (SEC) filings and in its Annual Sustainability Report. In 2024, this included a US\$5.25 million environmental penalty disclosed in both the SEC 10-K and the Sustainability Report: <a href="https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</a>
3.3a-c Payments to Governments	Conformance	The Entity has a Policy commitment to not make political donations, and it publicly discloses payments to governments, typically at a regional level. It also reports political contributions through its Political Action Committee (PAC), which is currently being phased out. This information is available via the U.S. SEC and the Entity's Policy Advocacy Disclosure.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity operates a corporate-wide Grievance Mechanism in all languages applicable to its areas of operations. The Mechanism is managed by a Third Party, which enables anonymous complaints to be raised. If access to this mechanism is not available, a complaint can be raised through several other processes and then recorded in the main system. Additionally, all operating sites have their own mechanisms to raise complaints and are being reviewed so that they are both culturally sensitive and accessible to Affected Populations. Local monitoring of potential issues is a component of the terms of reference of the Entity's Community Committees.</p> <p>A Global Complaints Procedure has now been finalised, with training and system rollout ongoing in several regions.</p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity evaluates its life cycle impacts and produces a range of Environmental Product Disclosures (EPD's) addressing its main Product and 'eco' specific Product lines produced by its hydroelectric powered smelters to communicate the outcomes of the Life Cycle Assessments (LCA). These are available on the Entity's website and by request and includes information on boundaries and assumptions: <a href="http://www.alcoa.com/sustana">http://www.alcoa.com/sustana</a></p> <p>EPDs are third-party verified, and LCA updates are in progress across major Product lines and facilities. The Entity is working to enhance the</p>



CRITERION	RATING	COMMENT
		level of detail provided in the information as well as the range of LCA and EPD's produced.
4.1b-c Environmental Life Cycle Assessment – Disclosure	Conformance	The Entity evaluates its life cycle impacts and produces a range of Environmental Product Disclosures (EPD's) covering its main Product and 'eco' specific Product lines produced by its hydroelectric powered smelters to communicate the outcomes of the LCA's. These are available on the Entity's website and by request and include information on boundaries and assumptions: <a href="http://www.alcoa.com/sustana">http://www.alcoa.com/sustana</a>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Not Applicable	This Criterion is not applicable to the Entity, as it is addressed at the location-level for each relevant Alcoa ASI Certified operation.
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's recycling strategy includes a range of activities, including increasing recycled content, engage in the development of innovative technology to increase Post-Consumer recycled streams and the quality of material inputs. The Entity engages with US-based organisations to increase the quality of Aluminium outputs from Materials Recovery Facilities It also liaises with other regional and national engagement relevant at its other locations. The Entity additionally participates in industry initiatives that promote recycling.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity publicly discloses Material energy use and GHG emissions by source in its Annual Sustainability Report and Data Book. The 2024 report includes both 'location-based' and 'market-based' Scope 2 emissions for the first time. All data are collected using the GEM system and verified by ERM CVS, with additional verification undertaken at some localities: <a href="https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</a>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as no new smelting capacity has been added post 2020. The Entity has made significant efforts to improve the quality of the emissions inventories across the portfolio. This Criterion also does not apply at the Corporate level and is considered (applicable) at the Smelter level.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity, as this Criterion does not apply at the Corporate level and is considered (applicable) at the Smelter level.
5.3a GHG Emissions Reduction Plans	Conformance	The Entity operates under the Alcoa Corporate GHG Emissions Reduction Plan, which is consistent with a 1.5°C warming scenario. The

CRITERION	RATING	COMMENT
		<p>Corporate Plan aims to reduce its emissions by 30% by 2025, 50% by 2030 and carbon neutrality by 2050. The GHG Emissions Reduction Plan is consistent with the ASI endorsed methodology.</p> <p>The Entity continues to evaluate Scope 3 emissions targets and discloses progress annually through its Sustainability Report: <a href="https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</a></p> <p>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>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has developed a business-wide GHG Emissions Reduction Plan and Pathway using the ASI-approved methodology, aligned to a 1.5°C scenario. It has committed to a ‘well below 2°C’ scenario, net-zero Scope 1 and 2 emissions by 2050, with progress tracked against interim targets for 2025 and 2030. A corporate and regional decarbonization roadmap has been completed, and the ASI Entity Pathways Tool is now being used to map performance at site level.</p> <p>The Entity continues to evaluate Scope 3 emissions targets and discloses progress annually through its Sustainability Report: <a href="https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</a></p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented Management Systems and operational controls to monitor and implement its GHG emissions reduction targets. In line with its decarbonisation strategy, the Entity has published a technology roadmap and developed a corporate and regional GHG Emissions Reduction Pathway using the ASI Pathways Tool. These systems support implementation at the site level.</p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Not Applicable	<p>This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.</p>
6.2a-g Discharges to Water	Not Applicable	<p>This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.</p>
6.3a-g Assessment and Management of Spills and Leakages	Not Applicable	<p>This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.</p>
6.4a-b Public Disclosure of Spills and Leakages	Not Applicable	<p>This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.</p>
6.5a-c Waste Management and Reporting	Not Applicable	<p>This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.</p>

CRITERION	RATING	COMMENT
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Not Applicable	This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has finalised internal guidance documents for mapping Areas of Influence and assessing Biodiversity risks. All sites have completed biodiversity risk assessments within the past five years, and the guidance is in the final stages of publication to support consistent implementation of the Biodiversity Management Standard.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.
8.2a-g Biodiversity Management	Conformance	The Entity continues to implement Biodiversity Action Plans at the site level in accordance with its Biodiversity Standard. A draft corporate Biodiversity Strategy and suite of supporting guidance documents are under internal review and will support consistent alignment with the Biodiversity Mitigation Hierarchy and site-based biodiversity risk management.
8.3a-c Management of Priority Ecosystem Services	Conformance	The Entity has developed guidance and training to support site-level identification and management of Priority Ecosystem Services. Implementation is supported by corporate and regional biodiversity specialists. All sites have completed baseline assessments, and guidance includes tools to apply the Biodiversity Mitigation Hierarchy. Work to strengthen engagement with Affected Populations in accordance with this Criterion is ongoing.
8.4 Alien Species	Conformance	The Entity has developed updated guidance to support implementation of its Biodiversity Management Standard, which includes requirements to prevent, identify, and manage Alien Species. Prevention is prioritised, and where Alien Species are present, site-level

CRITERION	RATING	COMMENT
		controls and rehabilitation measures are in place to mitigate impacts on Biodiversity and Ecosystem Services.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	The Entity has formulated a public commitment to not explore, mine or operate in World Heritage sites. Alcoa has no exploration, mining or other operational activities occurring within World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity confirms that it does not currently operate within Protected Areas. Site-level biodiversity assessments and management plans are developed with local Stakeholder input and are shared through community meetings and advisory boards. A reassessment of Areas of Influence is ongoing across global operations.
8.6e Protected Areas – Bauxite Mining	Conformance	The Entity operates in areas of high Biodiversity and aims not to operate in Protected Areas. Whilst some of the Entity’s operations are in proximity to Protected Areas and other nature reserves, they are not located within them.
8.7a-i Mine Rehabilitation	Conformance	The Entity’s corporate Mine Rehabilitation Standard applies the overriding principle that all mining shall be considered as transient land use and that areas used for mining will be rehabilitated to an agreed land use. Furthermore, its Biodiversity Policy contains a public commitment to progressive rehabilitation of mines to approved performance criteria, recognising that ecosystem restoration plays a key role in mitigating unavoidable Biodiversity impacts. Mine rehabilitation performance is published annually in its Sustainability Report. The Biodiversity Policy is available at: <a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/biodiversity-policy</a>
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has demonstrated strengthened alignment with the United Nations Guiding Principles for Business and Human Rights and the International Labour Organization (ILO) Core Conventions through expanded Human Rights Due Diligence efforts across global operations. This includes enhanced governance, site-level assessments, maturity evaluations, and updated tools and templates.  Efforts are ongoing to further improve engagement with Affected Populations and to extend Due Diligence practices beyond procurement: <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>
9.2a-e Gender Equity and Women’s Empowerment	Conformance	The Entity’s approach to gender equity and women’s empowerment is founded in its Inclusion and Diversity Strategy and incorporates employment practices, training, contracting, engagement processes, and management activities. These efforts are supported by the Code of Conduct, Equal Employment Opportunity, Human Rights, and Harassment-Free Workplace Policies, and are operationalised through structured programs such as the Alcoa Women’s Network.  Programs are reviewed and refined at both global and regional levels, and address barriers to professional development, Discrimination, Violence, and Harassment. Metrics and progress updates are disclosed annually in the Sustainability Report and other internal and

CRITERION	RATING	COMMENT
		external communications: <a href="https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf">https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</a>
9.3a-i Indigenous Peoples	Conformance	The Entity has implemented an Indigenous Peoples Policy that is publicly available, regularly reviewed and supported by internal standards. The social performance management approach includes procedures for community engagement, including with Indigenous and Land Connected Peoples which is typically implemented locally with community and social performance leads, with support provided by the Entity's corporate team. Personnel with specific expertise have been recruited at both a corporate and regional level to develop capability and ensure cultural, linguistic, governance and resource understanding is included in assessments and action plans. Further information is available at: <a href="https://www.alcoa.com/sustainability/social/indigenous-and-land-connected-people">https://www.alcoa.com/sustainability/social/indigenous-and-land-connected-people</a>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Conformance	The Entity's Indigenous and Land Connected Peoples Standard outlines key principles of Indigenous and Land Connected Peoples (ILP) agreements, including guidance on the agreement governance, agreement principles, content, agreement making and maintenance, and representation. The Entity continues to build capacity to consult and engage with Indigenous Peoples in order to obtain Free Prior and Informed Consent (FPIC) for Major Changes.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Conformance	The Entity's Indigenous and Land Connected Peoples Standard outlines key principles of Indigenous and Land Connected Peoples (ILP) agreements, including guidance on the agreement governance, agreement principles, content, the agreement process and maintenance, and representation.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Conformance	The Entity has established an Indigenous and Land Connected Peoples Standard, which outlines key principles of Indigenous and Land Connected Peoples (ILP) agreements, including guidance on the agreement governance, agreement principles, content, the agreement process and maintenance, and representation.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity has established an Indigenous People Policy and Cultural Heritage Management Standard. In line with other criteria, it involves Local Communities in the identification of such sites and landscapes and seeks their input and agreement of management approaches. This is enshrined in law in some operational regions. It may use local experts and third parties to help inform this process. It also has implemented Chance Find Procedures which assist in identifying unknown cultural and sacred heritage sites and applies the avoidance principle where possible. Where relevant, operating sites also adhere to locally defined processes as per local law.
9.5b Cultural and Sacred Heritage - Impacts	Conformance	The Entity has established an Indigenous People Policy and Cultural Heritage Management Standard. It involves Local Communities in the identification of such sites and landscapes and seeks their input and agreement of management approaches. This is enshrined in law in some operational regions. It may use local experts and third parties to help inform this process. It also has Chance Find Procedures which assist in identifying unknown cultural and sacred heritage sites and

CRITERION	RATING	COMMENT
		applies the avoidance principle. Where relevant, operating sites also adhere to locally defined processes as per local law.
9.6a-i Displacement	Conformance	The Entity has established a Resettlement, Land Acquisition and Influx Requirement Procedure, which is aligned to the IFC (International Finance Corporation) Standard 5 and addresses displacement. It is addressed within the Entity's Social Performance Standard with avoidance as the primary condition. The Entity does not participate in any involuntary displacement but has displaced livelihoods. As such, it has worked with Affected Populations to develop compensation agreements based on a third party loss and damage assessment. It monitors implementation on an ongoing basis including with Local Community committees and continues to support any families classified as vulnerable.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has a reference note within its social performance Management System that relates to any Vulnerable Person and is in addition to those covered by Indigenous and Land Connected Peoples. The Entity implements social improvement plans as well as environmental action plans to mitigate impacts. Plans are published locally.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity implements risk-based Due Diligence practices for Conflict-Affected and High-Risk Areas (CAHRAs) in accordance with the OECD Guidance. Its approach includes management systems, supplier screening and engagement, risk assessment and response strategies, audits, and annual reporting. Enhancements to systems integration, new screening and assessment tools have strengthened implementation.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity implements risk-based Due Diligence practices for Conflict-Affected and High-Risk Areas (CAHRAs) in accordance with the OECD Guidance. Its approach includes management systems, supplier screening and engagement, risk assessment and response strategies, audits, and annual reporting. Enhancements to systems integration, SOPs and the additions of new screening and assessment tools, have strengthened implementation.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>The Entity implements risk-based Due Diligence practices for Conflict-Affected and High-Risk Areas (CAHRAs) in accordance with the OECD Guidance. Its approach includes management systems, supplier screening and engagement, risk assessment and response strategies, audits, and annual reporting.</p> <p>The Entity's strategies for addressing supply chain risks identified are maturing.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices are subject to periodic internal audit and assessment and were audited as part of this ASI Audit. Specific high-risk locations are also audited as part of Due Diligence.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has reported on its Due Diligence in its Sustainability Report and the Entity's website refers to their commitment to ongoing Due Diligence. The Entity's broader reporting addresses their management, risks and there are details on responses to some high Human Rights risks.

CRITERION	RATING	COMMENT
9.9 Security practice	Not Applicable	This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity has established a Human Rights Policy that confirms the rights of Workers including forming or joining a Labour Union or other Associations to Collectively Bargain within the bounds of Applicable Law. In practice this is facilitated through Trade Unions and Works Councils. There are currently 31 active labour agreements across the Entity. 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>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Conformance	The Entity has established a Human Rights Policy that confirms the rights of Workers including forming or joining a Labour Union or other Associations to Collectively Bargain within the bounds of Applicable Law. In practice this is through Trade Unions and Works Councils. There are currently 31 active labour agreements across the Entity. 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>
10.2a Child Labour	Conformance	The Entity has established a Human Rights Policy that confirms hiring practices conform to the International Labor Organization (ILO) Conventions for minimum age and Child Labour. The Entity confirmed that they do not hire permanent employees under the age of 18. An exception to this includes summer internships in administrative roles and apprentices who may be under 18 years of age, who join in cohorts and follow a pre-defined development program. 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>
10.3a-c Forced Labour	Conformance	The Entity has established a Human Rights Policy that prohibits the use of all forms of Forced Labour, including prison labour, indentured labour, bonded labour, military labour, Forced Labour and any form of Human Trafficking. Implementation is overseen by the Operations Manager at the local (site) level.  The Entity has published a Modern Slavery Statement, 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>
10.4a-c Non-Discrimination	Conformance	The Entity has established an Inclusion Strategy and monitors inclusion and diversity. It can evidence progress in the percentage of employees from underrepresented groups. A range of inclusion groups support anti-Discrimination efforts and the Entity's mandatory 'Trusting Workplaces' global training module covers Discrimination and Harassment.
10.5 Communication and engagement	Conformance	The Entity has provided training to employees and has a range of regular meetings and employee touch points, such as 'daily dialogues' at the start of each shift, newsletters and the intranet to encourage employee engagement. It has also established Regional Inclusion Councils that organise events regularly. The Entity's anti-retaliation

CRITERION	RATING	COMMENT
		policy, publicised through its integrity cards, reiterates that 'No one can take action against you for asking a question or raising a concern in good faith'.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has addressed the requirements for Violence and Harassment within the Code of Conduct. All employees are trained on the Code of Conduct. The 'Trusting Workplaces' training, the integrity line, and employee engagement and communications encourages a 'speak up' culture. 'Trigger' words are monitored in employee surveys responses to monitor employee sentiment and take corrective actions where necessary. The Code of Conduct is provided in multiple languages, available at:</p> <p><a href="https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct">https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</a></p>
10.7a-c Remuneration	Conformance	<p>The Entity has defined employment terms and conditions that are accessible and understood by Workers and ensures that remuneration complies with or exceeds legal and industry standards. Wages are paid in legal currency, on time, and fully documented. Unionised employees are covered by Collective Bargaining Agreements, which are centrally stored for corporate-level review, while non-Union employees' remuneration is benchmarked and managed by a dedicated Human Resources team.</p> <p>The Entity has enhanced oversight mechanisms since the previous Audit to improve corporate visibility into remuneration practices, including Overtime compliance.</p>
10.8a-c Working Time	Minor Non-Conformance	<p>The Entity's Working Time practices comply with national law and applicable collective agreements, as set out in its Human Rights Policy. Alcoa follows local legislation, Collective Bargaining Agreements and local assessments in relation to Working Time.</p> <p>There is still however no comprehensive Corporate-level system to monitor or track compliance with Working Time thresholds across all locations.</p>
10.9a-b Informing Workers of Rights	Conformance	The Alcoa Corporate Policies and local terms and conditions are communicated through various means including the intranet and through line management. However, communication on Workers' rights is the responsibility of each site.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Not Applicable	This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Not Applicable	<p>This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation. However, the Alcoa EHS Management System Standard is reviewed annually as part of the EHS Corporate Team review process and setting the next cycles' objectives and targets. The continuous improvement cycle is addressed by Corporate EHS during the Project Environmental, Health and Safety Review (PEHSR) process. Incident data analysis also triggers analysis of business changes that may impact Worker safety.</p>



CRITERION	RATING	COMMENT
11.2 Employee engagement on Health and Safety	Not Applicable	This Criterion is not applicable to the Entity, as the requirements are directly addressed at the location-level for each relevant Alcoa ASI Certified operation.

#### ASI LIMITATION OF LIABILITY DISCLAIMER

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	23 August 2022	Initial Certification Audit – Full Certification
1	15 February 2023	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply V3; Correction to Public Headline Statement for Criteria 6.7a-f (equivalent to 6.7a-6.7e in V2) as Bauxite Mining is an included Supply Chain Activity.
2	20 September 2025	Surveillance Audit