

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Alcoa Aluminerie de Baie-Comeau

CERTIFICATE NUMBER

45

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE

20 SEPTEMBER 2025

DATE OF EXPIRY

19 SEPTEMBER 2028

CERTIFIED SINCE

20 SEPTEMBER 2019

AUTHORISED BY

A stylized, handwritten signature in black ink.

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

*Validity of this Certificate is subject to
continued conformance with the
applicable ASI Standard and can be
verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Alcoa Aluminerie de Baie-Comeau
in Canada, Aluminium Smelting,
Cathouse and administrative
associated facilities.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa Aluminerie de Baie-Comeau
CERTIFICATION SCOPE	Alcoa Aluminerie de Baie-Comeau in Canada, Aluminium Smelting, Casthouse and administrative associated facilities.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (9 – 11 July 2019)Re-Certification Audit (4 – 8 July 2022)Re-Certification Audit and Scope Change (21 – 28 May 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">9 – 11 July 2019 (Initial Certification Audit)4 – 8 July 2022 (Re-Certification Audit)21 – 28 May 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">16 August 2019 (Initial Certification Audit)5 August 2022 (Re-Certification Audit)23 August 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 – 11 July 2019)</u></p> <p>The Audit Scope included Aluminerie Alcoa de Baie-Comeau Smelting, including baking furnace, administrative facilities, and the Casthouse as part of Smelting.</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 (4 – 8 July 2022)</u></p> <p>The Audit Scope included Aluminerie Alcoa de Baie-Comeau Smelting, including baking furnace, administrative facilities, and the Casthouse as part of Smelting.</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 and Scope Change (21 – 28 May 2025)</u></p>

The Audit Scope included Aluminerie Alcoa de Baie-Comeau Smelting, including baking furnace, administrative facilities, and the Casthouse as part of Smelting.

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
---------------	---

AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none">☑ 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	20 September 2025 – 19 September 2028
----------------------	---------------------------------------

NEXT AUDIT TYPE	Re-Certification Audit
-----------------	------------------------

NEXT AUDIT DATE	19 September 2028
-----------------	-------------------

CERTIFICATE NUMBER	45
--------------------	----



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

Aluminerie Alcoa de Baie-Comeau (the 'Entity') is an Aluminium smelter located in Baie-Comeau, Quebec, Canada. The Entity commenced production in 1957 and currently employs 850 people.

First owned by the Canadian British Aluminium Company, then by Reynolds Metals Company, before being acquired by Alcoa (in 2000), it was built and expanded four times between 1957 and 1991. Its two series of prebaked anode technology cells have an annual production capacity of 312,000 metric tonnes of molten Aluminium. Its smelter is primarily dedicated to the production of rolling slabs, as well as the production of Sow and T-ingots. The Entity operates its own port Facilities for receiving Alumina, and Alcoa is a shareholder in the McCormick hydroelectric facility, which produces part of the energy used by the Entity.

The Entity is certified to ISO 9001:2015, ISO 14001:2015, ISO/IEC 17025:2005 and ISO 45001:2018, as well as PALA 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
SYSTEMS	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	Medium	High	HIGH
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity maintains a structured approach to legal and regulatory compliance through periodic monitoring and external support. A formal system is in place to track updates to applicable legal requirements, including those related to Health and Safety, environment, and financial governance.</p> <p>Certified Management Systems support compliance objectives, and periodic audits are conducted according to a defined schedule.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented an Anti-Corruption Policy and a Code of Conduct, which are communicated to all employees through mandatory onboarding and periodic training. Refresher training is provided to management, and unionised employees receive printed materials by mail. The Anti-Corruption Policy is available at: https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption</p> <p>The Code of Conduct is available at: https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct</p> <p>No cases of Corruption or fraud have been reported in recent years. All donations and sponsorships are subject to a structured internal approval process, including oversight by designated ethics representatives.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has established a corporate Code of Conduct applicable to all personnel, including new and existing employees at all levels. Formal acknowledgement and periodic training are required to ensure awareness and compliance. The Code is reviewed and updated regularly. The current version (May 2024) is publicly available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf</p> <p>A Supplier Code of Conduct has also been implemented, outlining expected ethical standards for business partners and contractors and is available at: https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf</p> <p>Employees have access to the Code and are encouraged to raise concerns or seek clarification through established internal channels. Role-specific training is provided where applicable.</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established a local Environmental, Health, and Safety (EHS) Policy that incorporates Environmental, Social and Governance (ESG) elements. The Policy is visibly posted at entrances to the Entity and in meeting rooms and is reviewed annually during management review processes. Revisions are triggered by Material changes to business operations or any indications of control gaps.</p> <p>New employees are required to confirm in writing that they have read and understood the Policy during the 'onboarding' process, and the</p>

CRITERION	RATING	COMMENT
		<p>Policy is also presented during periodic EHS meetings as part of ongoing communication.</p> <p>At the corporate level, the Entity has adopted the 'EHS Vision, Values, Mission, and Policy' which is subject to periodic review and is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/ehs-policy/EHS-Vision-Values-Mission-and-Policy-EN.pdf</p>
2.2a-c Leadership	Conformance	<p>The Entity has formally appointed a Management Representative responsible for leading the implementation and communication of Environmental, Social and Governance (ESG) Policies. The Site Manager has overall responsibility for implementing the ASI Performance Standard, with a designated Single-Point Accountability (SPA) assigned to each relevant area.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>A documented and mature Environmental Management System (EMS) is in place, certified to ISO 14001:2015. Certification has been maintained since 2004. The EMS includes procedures for identifying and assessing environmental risks.</p> <p>Audit findings are recorded and managed through a dedicated digital platform.</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has developed a Social Management System in collaboration with the corporate level. A designated corporate lead supported the Entity with this process and a series of structured tools are in use locally to identify Stakeholders, assess social risks and impacts, define obligations and priorities, and outline mitigation and communication strategies.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity adheres to a corporate-level responsible sourcing program, which includes the Supplier Sustainability Program and EcoVadis assessments. Local teams support supplier identification and management. Policies are current and reviewed regularly. For further information, refer to: https://www.alcoa.com/global/en/contact/supplier#supplier-sustainability-program and https://www.alcoa.com/global/en/contact/supplier/responsible-sourcing-program</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>The Criterion is not applicable to the Entity as there have been no New Projects or Major Changes over the previous three years, and no such changes are proposed in the near future.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>The Criterion is not applicable to the Entity as there have been no New Projects or Major Changes over the previous three years, and no such changes are proposed in the near future.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity maintains a documented Emergency Response Plan (ERP) which is always supported by a permanent response team available, with additional trained personnel for specific emergency scenarios. The Plan is reviewed annually and updated as needed based on operational changes or identified gaps.</p> <p>Emergency scenarios are routinely tested through drills and/or actual situations. Relevant local authorities and emergency organisations are</p>

CRITERION	RATING	COMMENT
		informed of the ERP and its main elements and is available upon request.
2.8a-d Suspended Operations	Conformance	<p>The Entity manages risks of suspended or significantly altered operations through a corporate-level Operational Risk Management (ORM) framework. Identified risks are addressed via contingency and emergency response plans, which include scenarios with potential environmental, social, or governance impacts.</p> <p>Plans are reviewed annually or as needed based on risk level or operational changes. Site-level emergency procedures are aligned with corporate ORM findings to ensure coordinated response and continuity.</p>
2.9a-b Mergers and Acquisitions	Conformance	The Entity has no active or planned mergers or acquisitions at the site level. These activities are managed at the corporate level under a formal standard that addresses environmental, Health and Safety risks.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity applies corporate procedures for closure and divestitures. No related activities are underway nor are planned.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity discloses its governance and Material impacts primarily through corporate-level reporting. Site data are submitted internally and included in the 2024 Sustainability Report: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p> <p>Stakeholder engagement is active, however, site-specific impact disclosures are limited. Technical data are also available via the National Pollutant Release Inventory (NPRI): https://www.canada.ca/en/environment-climate-change/services/national-pollutant-release-inventory/tools-resources-data/npri-map.htm</p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity maintains structured processes to identify, assess, and report compliance matters through scheduled internal reviews, legal and regulatory audits, and corporate oversight mechanisms. In 2024, no significant fines or penalties were issued. Additional details are available in the 2024 Sustainability Report (page 27), available at: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p>
3.3a-c Payments to Governments	Conformance	<p>The 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: https://investors.alcoa.com/sec-filings/default.aspx</p> <p>This information is also available in the Alcoa Annual Sustainability Report: https://www.alcoa.com/sustainability.</p>

CRITERION	RATING	COMMENT
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Minor Non-Conformance	The Entity has implemented a structured Complaints and Concerns Procedure 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' through the website. The Complaints Resolution Mechanism itself has not however been made publicly available.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity conducts 'cradle-to-gate' Life Cycle Assessments (LCA) in accordance with corporate procedures. All production qualifies under 'low carbon' criteria due to the use of hydroelectric power. Greenhouse Gas (GHG) emissions and LCA results are independently verified. Key environmental impacts are also integrated into the Entity's Environmental Management System.
4.1b-c Environmental Life Cycle Assessment – Disclosure	Conformance	The Entity provides Life Cycle Assessment (LCA) information upon request. Aluminium products marketed under the 'EcoLum' brand are classified as 'low carbon'. Public LCA details for the 'Sustana' and 'EcoLum' product lines are available at: https://www.alcoa.com/products/sustana
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has established targets and collects 100% of its Process Scrap for Collection, recycling and/or re-use. The Scrap inventory is kept updated and Scrap target levels are defined. The Entity monitors its process Scrap production and Product mixes with quantities and types of Scrap that can be used.</p> <p>The Entity has established a system to separate and record Aluminium alloys and grades for reuse. Dross is also reintroduced after being processed by an external supplier who provides it back in Sow form. Information on Product attributes is recorded within an operational and technical database.</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 manufactures only primary Product and has implemented processes and actions for managing Scrap. The Entity promotes 'end-of-life' recycling through local and national activities including membership of 'The Recycling Partnership' – the largest Aluminium recycling organisation in North America.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity reports annual energy use and Greenhouse Gas (GHG) emissions, with consolidated data disclosed in the 2024 Sustainability Report (pages 78–82): https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf

CRITERION	RATING	COMMENT
		At the Entity level, GHG emissions are reported under Quebec's regulatory framework, with public data available at: https://www.environnement.gouv.qc.ca/changements/ges/registre/index.htm Disclosed data are independently verified, with the assurance statement available at: https://www.alcoa.com/sustainability/pdf/assurance-statement.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as it commenced operations prior to 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	In 2023, the Entity's GHG Emissions intensity was 1.65 tonnes of CO ₂ equivalent per tonne of Aluminium.
5.3a GHG Emissions Reduction Plans	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.</p> <p>The Alcoa Climate Change Policy, inclusive of the GHG Emissions Reduction Plan is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/climate-change-policy</p>
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 from a 2015 baseline. 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: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/climate-change-policy</p> <p>Alcoa publicly discloses progress against the GHG Emissions Reduction Plan on an annual basis through its annual Sustainability Report at: https://www.alcoa.com/sustainability</p>
5.4 GHG Emissions Management	Conformance	The Entity maintains a certified ISO 14001 Environmental Management System through which it monitors and manages GHG Emissions and energy use. Reduction targets are established based on risk assessments and are reviewed annually. A multi-year action plan has been developed, and emission impacts from New Projects are evaluated to ensure compliance with applicable air quality regulations.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Minor Non-Conformance	The Entity operates under a five-year provincial environmental permit and has systems in place to manage required sampling, inspections, and monitoring. Air emissions data are submitted monthly to the authorities. Material emissions are disclosed annually in the 2024 Sustainability Report, though site-specific data are not separately reported:

CRITERION	RATING	COMMENT
		<p>https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf (page 102) and https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Data-Book.xlsx</p> <p>Emission targets are set based on risk and reviewed annually. Reduction plans for specific pollutants such as dust and fluoride are in place. New Projects are assessed for air quality impacts, and monitoring equipment follows a defined calibration procedure.</p> <p>Action plans are reviewed annually and updated when emissions exceed limits or when operational changes occur. These plans however are not currently publicly disclosed.</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity operates under a five-year environmental permit and maintains systems for monitoring and reporting water discharges in accordance with regulatory requirements. Monthly data are submitted to authorities, and additional reporting is conducted at the municipal level.</p> <p>Water intake, discharge volumes, and exceedances are tracked, with corrective actions implemented as needed. Calibration of monitoring equipment is documented and maintained.</p> <p>Water discharge data are disclosed annually in the 2024 Sustainability Report, though only in aggregated from across all Facilities: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf (pages 107–111) and the Data Book: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Data-Book.xlsx</p> <p>Site-specific targets and action plans are reviewed annually. New projects are assessed for environmental impacts to ensure compliance with applicable standards.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented an Environmental Management System, which includes documented procedures for identifying, managing, and responding to Spill and Leakage risks. Regular inspections, employee training, and routine awareness activities are in place to support prevention and response.</p> <p>Spill events are recorded, reported to authorities when required, and addressed through corrective actions. No significant environmental impacts or regulatory penalties were recorded in the reporting period.</p> <p>Spill and Leakage procedures are reviewed annually and updated following incidents or operational changes. A summary of corporate-level Spill and Leakage management information is disclosed in the 2024 Sustainability Report (page 106): https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity complies with regulatory requirements for the external reporting of Spills, with timely notification of relevant Stakeholders. Major Spills that impact ecosystems, communities, or extend beyond site boundaries are publicly disclosed in the 2024 Sustainability Report. No such events were reported in 2024. https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf (page 106)</p>

CRITERION	RATING	COMMENT
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity maintains an 'up to date' waste inventory, with records of types, volumes, and disposal routes. Waste manifests are retained, and required reports are submitted to environmental authorities. Waste audits are conducted on a scheduled basis, and Hazardous Waste reporting is performed annually.</p> <p>Waste risk assessments are integrated into the site's Environmental Management System. A corporate waste management standard guides Facilities in developing site-specific waste plans using the mitigation hierarchy. A detailed plan is under development in alignment with this requirement. Additional information available in the 2024 Sustainability Report (pages 103–105): https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</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 manages Spent Pot Lining (SPL) in accordance with regulatory requirements. Material is stored in a dedicated, inspected facility and transported in approved containers to authorised treatment or disposal sites. 'Second-cut' SPL is pre-treated and sent for final disposal at a licensed facility.</p> <p>There is currently no recycling option available in the region, though a recycling initiative is under development in collaboration with external partners. No SPL is discharged to freshwater, estuarine or marine environments.</p>
6.8a-d Dross	Conformance	<p>Dross is stored and managed on site according to the Entity's waste management plan. Recovery percentages are tracked annually within the Casthouse to maximise the recovery of Aluminium by treatment of Dross and Dross residues.</p> <p>All recovered mixed Dross is sent to a third-party recycler for metal recovery and the residual saltcake from that process is sent to an authorised landfill.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>According to its Water Management Plan, the Entity prepares an annual water balance which presents the water input and output flows, sources and destination. Water usage is monitored through the Entity's utility system.</p> <p>The Entity's water usage is presented in the 2024 Sustainability Report (pages 109 – 111): https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p> <p>The Entity has conducted an environmental risk assessment which includes water. Water use is not considered a significant risk.</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as there were no Material risks identified relating to water use and discharge.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>In 2024, the Entity updated its Biodiversity and Ecosystem Services assessment to reflect current risks, impacts and dependencies. The study includes a defined Area of Influence, mapping of sensitive Biodiversity and ecosystem service values, and a documented methodology to assess material impacts and legal compliance.</p> <p>Stakeholders within the Area of Influence were consulted during this update, and their feedback was considered in the study. An associated action plan for 2024–2029 is included in the study, with implementation of the plan already underway.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	<p>In 2024, the Entity assessed Ecosystem Services, which identified air quality regulation and water resources as priority services. Related actions are outlined in the Biodiversity and Ecosystem Services Action Plan (2024–2029), with implementation of the plan already underway.</p> <p>The assessment includes maps showing sensitive Biodiversity areas and Ecosystem Services values in proximity to the Entity.</p>
8.2a-g Biodiversity Management	Conformance	<p>The Entity has developed a Biodiversity and Ecosystem Services Action Plan covering the 2024–2029 period. The Plan outlines targets and actions to address Material Biodiversity risks and reduce existing impacts, aligned with regulatory requirements.</p> <p>The Plan was prepared with input from external specialists and includes Stakeholder consultation within the Area of Influence. While the full Plan is not publicly disclosed, it has been shared with local Stakeholder groups. The Plan is reviewed as required based on changes in operations or identified risks.</p> <p>More information on the Plan is available in the 2024 Sustainability Report at: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf (pages 93–97).</p>
8.3a-c Management of Priority Ecosystem Services	Conformance	<p>Whilst the Entity does not rely directly on Priority Ecosystem Services however it has identified those relevant to affected populations through a recent assessment. While impact reduction opportunities are limited, actions are proposed using the Biodiversity Mitigation Hierarchy to preserve the functionality and accessibility of these services. Most sources of impact are within the Entity's direct control.</p>
8.4 Alien Species	Conformance	<p>The Entity's Biodiversity assessment identifies invasive species risks and introduction pathways, including ballast water and wooden pallets, both regulated by external authorities. Invasive species present near the Entity are monitored, and awareness efforts are conducted to limit their spread. Invasive species management is included in Biodiversity training and materials.</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	<p>The Entity operates within a designated Biosphere Reserve, as noted in its Biodiversity assessment. A Reserve representative participates in community engagement, and no New Projects or Major Changes are planned that would impact the area's conservation values. For more information, refer to: https://www.rmbmu.com/the-biosphere-reserve/?lang=en</p>
8.6a-d Protected Areas	Conformance	<p>No Protected Areas are located within the Entity's Area of Influence, as confirmed by a recent Biodiversity assessment. Nearby designated areas do exist but are not directly or indirectly affected by the Entity's activities. The Entity complies with applicable legal requirements and</p>

CRITERION	RATING	COMMENT
		is not required to develop or disclose management plans related to these areas.
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 Entity has implemented a publicly available, gender-responsive Human Rights Policy, available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf</p> <p>A Human Rights Due Diligence was completed in 2024 following the UN Guiding Principles, with input from internal and external Stakeholders. The Entity's Area of Influence includes Indigenous and Local Communities. No adverse impacts were identified, but recommendations were made and considered.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has Policies and procedures in place to promote gender equity and inclusion, supported by employee training and local action plans. Initiatives are underway to improve gender representation and engage underrepresented groups through outreach and recruitment efforts.</p> <p>Complaints related to gender-based misconduct are addressed through established processes, and disciplinary actions are taken where appropriate. Progress on gender equity is monitored and publicly disclosed in the 2024 Sustainability Report (page 75): https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf</p>
9.3a-i Indigenous Peoples	Conformance	<p>The Entity has publicly disclosed an Indigenous Peoples Policy aligned with International Standards, including ILO Convention 169 and the UN Declaration on the Rights of Indigenous Peoples. The Area of Influence includes recognised Indigenous territory, and engagement is supported by a structured strategy. Communication with the local Indigenous community is ongoing, and internal capacity is in place to support respectful collaboration.</p> <p>The Policy is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/indigenous-peoples-policy/Indigenous-Peoples-Policy-English.pdf</p>
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	The Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes over the previous three years, and no such changes are proposed in the near future.
9.4b Free, Prior, and Informed Consent (FPIC) – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) – Demonstrate support	Not Applicable	<p>The Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes over the previous three years, and no such changes are proposed in the near future.</p> <p>The Entity however is committed to being responsible in dealing 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 performing the Free, Prior, and Informed Consent (FPIC) where is required.</p>
9.5a Cultural and Sacred Heritage – Identification	Conformance	<p>The Entity has conducted an Environmental and Social Impact Assessment for a major remediation project, which confirmed that there are no sacred or cultural heritage sites within its operational area. The assessment found no adverse impacts on cultural heritage, and relevant documentation was submitted to the competent environmental authority.</p>
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	<p>The Criterion is not applicable to the Entity, as there are no projects that impact cultural, historical or spiritual heritage.</p>
9.6a-i Displacement	Not Applicable	<p>The Criterion is not applicable to the Entity as the Entity only operate within the boundaries of its property and there are no residents located within, or adjacent to this area.</p>
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has identified significant impacts, including Health and Safety, social and cultural Human Rights, and environmental impacts resulting from its activities.</p> <p>Risks are presented to a public Community Advisory Committee that periodically brings together external Stakeholders from the Baie-Comeau region. Action plans to reduce risks are also presented to this public committee, and participants are consulted on the suggested actions.</p> <p>In addition to presentation to the Advisory Committee, the Entity publicly discloses a summary of the plan and actions regarding Affected Populations and Organisations in its 2024 Sustainability Report, available at: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf (pages 50-52).</p> <p>The Community Advisory Committee is the main mechanism to ensure the participation of Affected Populations and Organisations, and to explore with them opportunities to respect and support their livelihoods.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	<p>For Conflict-Affected and High-Risk Areas (CAHRAs), the Entity uses the Corporate Standard Operating procedure entitled 'Commercial Due Diligence' which is a Due Diligence Program for Bauxite, Alumina, Aluminium and Scrap suppliers for the purpose of ASI Certification, where the process specified adhered to OECD guidance on specified countries.</p> <p>The Entity operates in a very stable democratic and political context. Refer to: https://www.alcoa.com/global/en/contact/supplier/north-america/pdfs/standard-terms-and-conditions-services.pdf and https://fr-ca.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/supplier-standards/Supplier_Standards.pdf</p>

CRITERION	RATING	COMMENT
		Alcoa's Supplier Standards and Standard Terms and Conditions further describe Alcoa's expectations from suppliers.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity has implemented a Due Diligence Program to manage risk of procurement from CAHRAs. The methodology uses external platforms and tools to identify and to address ESG risk with consideration of industry, countries of operation (including CAHRAs) and criticality of supply.</p> <p>The Due Diligence Program is managed at the corporate level and allows to raise and to be aware of any 'red flag' regarding its procurement.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>The Entity's Responsible Sourcing Program includes various means to respond to identified risks regarding CAHRAs. Based on the results of the Due Diligence Assessment (DDA), on-site audit, additional questionnaires, training programs, and corrective action plans may be required for the suppliers to improve their conformance. Unsatisfactory results may also lead to rejection of the supplier.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	This Audit satisfies the requirements of this Criterion of the Performance Standard.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity reports annually on its supply chain Due Diligence within its 2024 Sustainability Report. Refer to: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf (pages 33-37).</p> <p>The Entity also publicly communicates on its Responsible Sourcing Framework at: https://www.alcoa.com/global/en/contact/supplier</p>
9.9 Security practice	Conformance	The Entity has engaged a private security contractor, which is required to respect and apply all Alcoa local and corporate Policies and rules, including the Human Rights Policy and the Code of Conduct. They are also trained by Entity on the Policies and rules.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity maintains Collective Bargaining Agreements with Union representation across departments. Union representatives support communication, participate in committees, and oversee agreement implementation. New employees are informed of their rights upon hiring, and ongoing engagement is supported through meetings and dedicated communication channels.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as there is no legal restriction to the Right of Freedom of Association and Collective Bargaining in Canada.
10.2a Child Labour	Conformance	The Entity prohibits the use of Child Labour in accordance with its Human Rights Policy and Code of Conduct. Age verification is conducted through the Human Resources Management System, which confirms that all employees meet legal working age

CRITERION	RATING	COMMENT
		requirements. The Entity is committed to avoid Child Labour through its Code of Conduct and Ethics, specifically on pages 30 and 34 at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf
10.3a-c Forced Labour	Conformance	<p>The Entity prohibits Forced Labour and Human Trafficking through its Human Rights Policy and Code of Conduct, which are supported by internal hiring procedures and third-party Due Diligence. Recruitment processes are transparent and managed by qualified personnel and approved agencies operating within applicable legal frameworks.</p> <p>All Workers, including temporary and migrant personnel, undergo background checks and freely consent to employment. No personal documents are retained, and employees have access to their records and the ability to resign without restriction.</p> <p>A corporate Modern Slavery Statement is available at: https://www.alcoa.com/sustainability/pdf/2023-Modern-Slavery-Statement.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity demonstrates a strong commitment to non-Discrimination and inclusion, supported by corporate Policies, dedicated employee resource groups, and compliance with applicable Human Rights legislation. At the Entity level, a Diversity Committee promotes equity, and outreach activities engage women and diverse groups through public events and educational visits. Oversight includes internal audits, and leadership participation in regional inclusion programs reinforces accountability.
10.5 Communication and engagement	Conformance	<p>The Entity promotes transparent communication and fair resolution of workplace issues through structured employee meetings, collaboration with Union representatives, and access to Grievance Mechanisms. Workers are protected by an Anti-Retaliation Policy and may confidentially report concerns via the Alcoa Integrity Line, accessible at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/integrity-line/Integrity_Line_Card_English.pdf</p> <p>These mechanisms are widely communicated and used by employees.</p>
10.6a-g Violence and Harassment	Minor Non-Conformance	<p>The Entity has implemented a corporate Policy addressing Harassment and workplace Violence. The Policy is reviewed and updated periodically and is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/harassment-bullying-free-workplace/Harassment-and-Bullying-Free-Workplace-Policy-EN.pdf</p> <p>Awareness and training initiatives, including annual Code of Conduct refreshers, are provided to relevant personnel. While preventive measures are in place, formal risk assessments for workplace Harassment and Violence are conducted with Worker participation have not yet been fully integrated into the site's Occupational Health and Safety (OH&S) Management System.</p>
10.7a-c Remuneration	Conformance	The Entity complies with Applicable Laws and internal Policy requirements on fair Remuneration. Compensation exceeds the legal minimum and Remuneration equity assessments are conducted in accordance with regulatory timelines. Wages are paid regularly via

CRITERION	RATING	COMMENT
		<p>direct deposit, with accessible pay documentation. Confidential interviews undertaken during the Audit confirmed no concerns related to Remuneration or access to payment information.</p> <p>Minimum wage reference is available at: https://www.cnt.gouv.qc.ca/salaire-paie-et-travail/salaire/index.html</p>
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time and has implemented a procedure regarding Working Time regulations such as the approval of Overtime or if employees are working over the allowed hours.
10.9a-b Informing Workers of Rights	Conformance	The Entity facilitates Worker awareness of rights and responsibilities through structured communication channels, including onboarding, workplace meetings, and accessible Policies. Workers are empowered to report concerns or stop work when facing uncertainty or risk, supporting a culture of safety and open engagement.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented a certified Occupational Health and Safety (OH&S) Management System aligned with ISO 45001:2018. Risk identification and evaluation processes are documented and periodically reviewed. Health and Safety performance is monitored through defined Key Performance Indicators (KPIs), including incident rates and training completion.</p> <p>Mandatory and refresher training programs are in place, supported by human resources systems. All Health and Safety findings are recorded and managed in internal systems, supporting continuous improvement and alignment with corporate and International Standards.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's OH&S Management System is certified under ISO 45001:2018. A review of the OH&S Management System is conducted annually.</p> <p>The Entity published statistics on OH&S performance in the 2024 Sustainability Report, available at: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf (pages 47-48) and in the 2024 Alcoa Databook: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Data-Book.xlsx</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity maintains joint Health and Safety Committees and fosters active Worker participation in OH&S, in accordance with regulatory requirements. Regular shift meetings, structured reporting tools, and collaborative improvement projects ensure that safety concerns are consistently identified, discussed, and addressed. Incident management is monitored through a digital platform with a daily 'cross-functional' review.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking,

representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	20 September 2019	Initial Certification Audit – Full Certification
1	20 September 2022	Re-Certification Audit
2	23 September 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply Performance Standard V3.1.