

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Alcoa Portland Aluminium

CERTIFICATE NUMBER
273

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

CERTIFICATION LEVEL
**PROVISIONAL
CERTIFICATION**

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

DATE OF ISSUE
17 APRIL 2026

DATE OF EXPIRY
16 APRIL 2027

CERTIFIED SINCE
17 APRIL 2023

AUTHORISED BY

CERTIFICATION SCOPE

Alcoa Portland Aluminium Smelting Facility, Primary Aluminium production, and Casting including administration activities located in South-Western Victoria, Australia.

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

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Alcoa Corporation
ENTITY NAME	Alcoa Portland Aluminium
CERTIFICATION SCOPE	Alcoa Portland Aluminium Smelting Facility, Primary Aluminium production and Casting including administration activities located in South-Western Victoria, Australia.
SUPPLY CHAIN ACTIVITIES	- Aluminium Smelting - Casthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	- Initial Certification Audit (14 – 17 November 2022) - Surveillance Audit (7 – 14 October 2024) - Re-Certification Audit and Scope Change (23 – 27 February 2026)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	14 – 17 November 2022 (Initial Certification Audit) 7 – 14 October 2024 (Surveillance Audit) 23 – 27 February 2026 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	14 March 2023 (Initial Certification Audit) 25 November 2024 (Surveillance Audit) 4 June 2026 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<u>Initial Certification Audit (14 – 17 November 2022)</u> The Audit Scope includes the Alcoa Portland Aluminium smelter in south-western Victoria, Australia. Facilities include Aluminium smelting, Casthouse and administrative Associated Facilities. Supply chain activities included in the Audit Scope: - Aluminium Smelting - Casthouses All relevant criteria in the ASI Performance Standard were included in the Audit Scope. <u>Re-Certification Audit (7 – 14 October 2024)</u> The Audit Scope includes the Alcoa Portland Aluminium smelter in south-western Victoria, Australia. Facilities include Aluminium smelting, Casthouse and administrative Associated Facilities. Supply chain activities included in the Audit Scope: - Aluminium Smelting - Casthouses

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

Re-Certification Audit and Scope Change (23 -27 February 2026)

The Audit Scope includes the Alcoa Portland Aluminium smelter in south-western Victoria, Australia. Facilities include Aluminium Smelting, Casthouse and administrative Associated Facilities.

Supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Casthouses

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

AUDIT OUTCOME	• Certification
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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	17 April 2026 - 16 April 2027
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NEXT AUDIT TYPE	Re-Certification Audit
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NEXT AUDIT DATE	16 April 2027
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CERTIFICATE NUMBER	273
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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 Portland Aluminium (the 'Entity') commenced operations in 1986 and is a joint venture between Alcoa of Australia (55%), CITIC (22.5%), and Marubeni Aluminium Australia (22.5%). Alcoa manages the day-to-day operations at the smelter.

The Entity is the only smelting facility owned by Alcoa in Australia, and is an important asset to the Group, producing around 20 percent of Australia's Aluminium. The Entity has an annual nameplate production capacity of 358,000 metric tonnes and produces 22.5 kilograms of Aluminium ingots. The majority of the Entity's product is exported to customers in Asia.

The Entity is located within the Glenelg Shire in Portland in Victoria Australia. It sits on approximately 600 hectares of land, with smelter operations, ancillary buildings and roads occupying approximately 100 hectares. The 500 hectares of land surrounding the operations is managed to protect and conserve native fauna, focusing on the protection of habitat with an emphasis on significant species. The Entity is committed to continuously improving environmental performance, reducing environmental impacts and developing more sustainable operating practices.

The Entity is the largest employer in the region with approximately 600 direct employees and 250 Contractors, with the majority living locally in Portland, which has a population of approximately 10,000.

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	Medium	HIGH
PERFORMANCE	High	High	Medium	HIGH
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented appropriate systems required to maintain awareness, ensure Compliance with Applicable Laws, and maintain a context-sensitive commitment to customary and/or traditional practices. The Portland Aluminium Smelter operates under the <i>Alcoa (Portland Aluminium Smelter) Act 1980</i>, which ratifies, validates, and gives legal effect to an agreement between the Premier of the State of Victoria and Alcoa of Australia Limited. The Act provides the statutory framework for the establishment and operation of the Aluminium smelter at Portland and grants specific rights and obligations incidental to the construction and ongoing operation of the smelter. Refer to: https://content.legislation.vic.gov.au/sites/default/files/2024-06/80-9434aa015-authorised.pdf
1.2 Anti-Corruption	Conformance	The Gifts and Entertainment Policy is outlined in the Alcoa Corporate Code of Conduct: (https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct) and reinforces the Entity's commitment to ethical practices. Alcoa Corporate also has an exclusive Policy on Anti-Corruption at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/anti-corruption#:~:text=Gifts%20and%20Hospitality.&text=reasonable%20in%20value%20and%20appropriate,permitted%20under%20applicable%20law%3B%20and Additionally, the Entity has an Integrity Line available to internal and external Stakeholders, to report any concerns related to ethics or compliance. Contractors also receive anti-Corruption training, typically through their own companies, to ensure that third-party partners align with the Entity's ethical standards.
1.3a-e Code of Conduct	Conformance	All Australian sites must adhere to all Alcoa global Policies. The Code of Conduct is introduced to new employees during their induction and is part of the annual mandatory training. The Code of Conduct was last updated in 2024 and remains a key element of the required training, with progress monitored and reported. Code of Conduct and Ethics: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/code-conduct/Code_Conduct_English.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity as part of Alcoa maintains a globally applicable EHS Policy, publicly disclosed at: (https://www.alcoa.com/sustainability/social/environment-health-safety), supported by a site-specific EHS Policy for the Portland site that was last updated in May 2025 and is endorsed by the current Plant Manager. Alcoa has publicly disclosed global social and governance Policies, including Human Rights, Indigenous Peoples, Anti-Corruption, Code of Conduct, and the Integrity Line, reinforcing its commitment to responsible business practices. Refer to:

CRITERION	RATING	COMMENT
		https://www.alcoa.com/global/en/who-we-are/ethics-compliance/social-policy Assessment of conformance to these corporate policies is assessed through regular conduct of both corporate and internal audits (ASAT). The Entity communicates its EHS Policy to employees, Contractors, and other Stakeholders through various means such as training, document control systems, and by displaying copies in prominent locations. The Policy is also available upon request to interested parties and is communicated through mandatory training with assessments amongst both employees and Contractors.
2.2a-c Leadership	Conformance	The Entity has nominated the Senior Community and Corporate Affairs Advisor as having overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented integrated Environmental and Social Management Systems. The Environmental component of the management system is certified to ISO 14001:2015.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented, implemented, and maintains a Social Management System. The Entity is adhering to Alcoa's Social Performance Management Standard and System which includes four standards (i.e. Social Performance Management Standard, Cultural Heritage Standard, Indigenous Peoples Standard and Human Rights Policy).
2.4a-e Responsible Sourcing	Conformance	Alcoa operates a global Responsible Sourcing Policy and Responsible Sourcing Program, applicable across all operations including the Entity: https://www.alcoa.com/global/en/contact/supplier/responsible-sourcing-program At the Entity, commercial inputs including contractual terms, supplier engagement, and commercial risk considerations are managed locally. Supplier engagement is governed by Alcoa's Supplier Selection Policy (https://www.alcoa.com/australia/en/suppliers), which requires suppliers to undergo a pre-qualification process prior to contract award. This process includes assessment of environment, health, safety, and sustainability management, ethical and anti-Corruption practices, business capability and quality management, financial capacity, and continuous improvement approaches. An example supplier assessment was reviewed during the Audit. The Responsible Sourcing Framework is disclosed in the 2024 Sustainability Report, page 81: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf Further detailed information is also available on Alcoa Suppliers webpages.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects.

CRITERION	RATING	COMMENT
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects.
2.7a-f Emergency Response Plan	Conformance	The Entity has a site-specific Emergency Response Plan developed in consultation with the Local Community. It provides clear and concise guidelines for the preparedness for and response to emergencies that may occur. Workers are provided training and undertake drills on emergency response periodically, focussing on high-risk areas.
2.8a-d Suspended Operations	Conformance	The Entity has established a robust and mature risk management framework, aligned with the ISO 31000 standard, that effectively identifies, monitors, and mitigates environmental, social, and business risks. Crisis management, emergency response, and business continuity arrangements are well-structured, tested, and embedded across global, regional, and site levels. Regular reviews, drills, and clearly assigned accountabilities support strong operational resilience and risk governance.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a robust, corporate-aligned Due Diligence framework for mergers, acquisitions, and land transactions, consistent with Alcoa's Environment, Health and Safety (EHS) and ESG standards. Community engagement and EHS risks are systematically considered and embedded in approval and governance processes. A review of relevant processes that were employed as part of Alcoa's recent acquisition of Alumina Limited demonstrates strong disclosure practices and no Material new ESG impacts, reflecting effective continuity in ESG risk and data management.
2.10a-b Closure, Decommissioning and Divestment	Conformance	Whilst a formal closure plan for smelting operations has not been formally developed, the Entity has demonstrated a structured and ongoing approach to remediation, contamination management, and waste monitoring through its environmental management program. Clear EHS Due Diligence processes are applied for acquisitions, divestments, and land transactions, ensuring environmental and safety risks are assessed and addressed. Closure, decommissioning, and divestment activities are governed at the corporate level, with oversight by Alcoa's Vice President Transformation, providing consistent and centralised governance.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its Material environmental, social, and economic impacts in the published Annual and Sustainability Reports of the Entity's parent company Alcoa. The 2024 Sustainability Report is available at: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity adheres to the relevant internal compliance Standard through its established processes for identifying, documenting, and managing a Management System for non-conformities. Non-conformities are subject to corporate and legal review, ensuring accountability and oversight. Any major non-conformities are publicly disclosed the 2024 Sustainability Report: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf

CRITERION	RATING	COMMENT
		The Entity engages with environmental agencies, and external Stakeholders to identify the root cause of the non-compliances and find solutions to address them as soon as possible. The Entity uses an environmental compliance and tracking system to identify issues, monitor progress towards targets and verify that actions are effective.
3.3a-c Payments to Governments	Conformance	The Entity has established a framework to ensure all relevant customs fees and legal payments are made to the government. Payments to all government agencies and officials are covered by corporate Policies and monitored by an external solutions provider.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented well-established and integrated processes for managing community contacts, complaints, and grievances, aligned with its Environmental and Social Management Systems. Communication channels are clearly accessible to the public, and issues are logged, escalated, and addressed in a timely and structured manner. Ongoing reviews and continuous improvement activities support a mature and effective community engagement framework. Grievances may also be raised through the Integrity Line, which is managed at the global level and is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/integrity-line The Alcoa Human Rights Policy prescribes Grievance Mechanisms and provides an additional formal avenue for raising and addressing concerns: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/human-rights-policy
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	A 'cradle-to-gate' Life Cycle Assessment (LCA) for the Entity was completed by third-party experts and completed in accordance with the ISO 14044 standard and was reviewed during the Audit. In addition, site-specific aspects and Impact Assessments are undertaken in accordance with ISO 14001:2015 requirements and are maintained at the operational/site level. The Entity plans to undertake an updated LCA, if future capacity increases and decarbonisation projects materially change emissions intensity. The Entity also provides data to International Aluminium Institute (IAI) who releases global LCA and Life Cycle Inventory (LCI) datasets every five years.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity's customers and other Stakeholders may access IAI-LCA publications and the Alcoa website (www.alcoa.com/sustana) informs customers on the availability of the Environmental Product Declarations (EPDs) for EcoLum Primary Aluminium products and carbon footprint certificates for EcoSource Alumina products, encouraging customers to request this information. The EPDs are also available online through UL Solutions (via an App) at: www.ul.com
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity demonstrates conformity with applicable requirements for Scrap and Dross management, with processes in place to minimise Aluminium Scrap generation and maximum recycling. Scrap

CRITERION	RATING	COMMENT
		generation and remelting performance are routinely monitored using defined thresholds, supported by a daily Management System and continuous equipment reliability improvements. Additionally, the Entity has been undertaking excess Scrap evaluation by selling it to external licensed Scrap processing companies.
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 smelting and Casthouse operations are all Primary Casthouses, positioned 'upstream' from 'end consumers'. As a result, it does not have any direct influence over the management of Scrap material at the end of the product lifecycle.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity is legally required to report its annual Greenhouse Gas (GHG) emissions through the National Emissions and Energy Reporting System (EERS) platform in accordance with the National Greenhouse and Energy Reporting (NGER) Scheme, the Australian Government's system for tracking GHG emissions and energy use. The NGERs dataset for 2024-25 is disclosed at: https://cer.gov.au/markets/reports-and-data/nger-reporting-data-and-registers/national-greenhouse-and-energy-register-2024-25 Energy consumption and Scopes 1-3 GHG emissions (GHG) data are also reported at the corporate level and disclosed in its 2024 Sustainability Report, pages 11 and 20-22 and 81: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as the Entity has not commissioned new Aluminium Smelting Facilities after 2020.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Major Non-Conformance	The 'mine to metal' Emissions intensity for 2025 is reported at 16 tCO ₂ e per tonne of Aluminium exceeding the Criterion threshold of 13t CO ₂ e per tonne. The Entity has implemented emissions reduction plans and forecasts that the emissions intensity will be below the 11 tCO ₂ e threshold by the required date, however, this is subject to continued progressive 'decarbonisation' of the regional electricity grid progressing as forecast.
5.3a GHG Emissions Reduction Plans	Conformance	A 1.5°C-aligned emissions pathway has been established, and the 'mine-to-metal' emissions pathway was reviewed at Audit in accordance with the ASI Entity GHG Pathways Method and Calculation Tool. The baseline year assigned is 2025, and under current assumptions, the projected emissions trajectory predominantly aligns with the ASI-defined pathway. At the corporate level, Alcoa has established Scopes 1 and 2 emissions reduction commitments, which are publicly disclosed in its 2024 Sustainability Report, page 79:

CRITERION	RATING	COMMENT
		https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	At the corporate level, Alcoa has established Scopes 1 and 2 emissions reduction commitments, which are publicly disclosed in its 2024 Sustainability Report, page 79: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf The plan and progress against the targets are reviewed at least annually as part of the Alcoa Corporate long-term planning process.
5.4 GHG Emissions Management	Conformance	The Entity adheres to its ISO certified EMS and Environmental Improvement Plans to evaluate operational procedures and limit direct emissions where feasible, such as furnace operations, potline ‘start up’, and pot operating procedures. GHG emissions and associated decarbonisation enablers are integrated into Alcoa long-term planning processes, with emissions performance regularly monitored against established plans. Climate-related considerations are embedded within governance structures, objectives, performance monitoring, and the ‘decision-making’ process through an overarching Policy framework. The Alcoa Corporate Climate Change Policy is disclosed at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/climate-change-policy
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity has established multiple procedures to quantify and report Emissions to Air that have adverse effects on humans or the environment and has implemented initiatives to minimise these adverse impacts. The Entity performs a health risk assessment to assess the potential impact of the emissions on public health. Monitoring is undertaken in accordance with the requirements set by the National Association of Testing Authorities (NATA), and there is a schedule in place for conducting the monitoring, which is specified in the environmental monitoring manual. An environmental risk assessment relating to air emissions has been undertaken for the Entity to enable the development of a risk-based air monitoring program and show compliance against license conditions. Air emissions data are reported to the National Pollutant Inventory (NPI) and are disclosed at: https://www.npi.gov.au/npidata/action/load/individual-facility-detail/criteria/state/VIC/year/2024/jurisdiction-facility/00004729 Further corporate-wide disclosure is available in the 2024 Sustainability Report, page 102: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
6.2a-g Discharges to Water	Conformance	Water discharge records are maintained in accordance with legal requirements. Water discharges are reported annually to the National Pollutant Inventory (NPI) and publicly available at: https://www.npi.gov.au/npidata/action/load/individual-facility-detail/criteria/state/VIC/year/2024/jurisdiction-facility/00004729

CRITERION	RATING	COMMENT
		Water discharge quantities and discharge sources are disclosed in the 2024 Sustainability Report, page 109: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf Water quality parameters are monitored at both collection and discharge points. The site maintains records of water withdrawals and discharges, with no discharge to groundwater reported. Cooling water is neither extracted from, nor discharged to groundwater systems. A groundwater monitoring program has been implemented to assess potential contamination risks, including monitoring adjacent to landfill areas and the smelter.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity appropriately assesses, mitigates, and manages its potential Spills and Leakages. The Entity understands its major risk areas and has ensured that all external communications plans, Stakeholder guidelines, compliance controls, and monitoring programs work in tandem to detect and mitigate Spills and/or Leakages.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has implemented appropriate measures to ensure that any Spills are immediately and effectively reported and that an effective incident response plan is ready to be mobilised. Periodic incident reporting as mandated by regulators is used to communicate and publicly disclose Spills and remediation actions taken. The Entity has not reported any significant Spills to date. Minor Spills and leaks are however reported to the Victorian Environment Protection Authority (EPA) in accordance with the requirements of the Entity's EPA license. Additionally, if a Spill or its remediation breaches any conditions of the Entity's EPA license, the incident is publicly disclosed in the annual performance statement. As per the 2024 Sustainability Report, the Entity defines a major Spill as having a significant and potentially lasting impact on ecosystems or communities. In 2024-25, the Entity recorded zero major Spills.
6.5a-c Waste Management and Reporting	Conformance	Waste-related information is publicly disclosed at a corporate level through 2024 Sustainability Report, pages 103-105: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf The Entity has considered how best to implement a waste management strategy that integrates principles from the Waste Mitigation Hierarchy. This is reflected in the Entity's Waste Management Manual. Alcoa Corporate manages all waste management targets. A key focus area is the management and reduction of Spent Pot Lining (SPL), including actions to address legacy stockpiles. Initiatives are ongoing to increase the removal and improve the management of SPL, with a target to address legacy issues by 2028.
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	The Entity has optimised processes for the recovery and recycling of SPL. A contract is in place with an external recycler, and the Entity sends SPL for treatment. The Entity utilises on site designated storage buildings/containers to store SPL prior to recycling. There are no discharges to marine or aquatic environments. Waste optimisation

CRITERION	RATING	COMMENT
		including managing SPL is disclosed in its 2024 Sustainability Report, page 114: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
6.8a-d Dross	Minor Non-Conformance	Consistent with its Waste Management Manual, the Entity has established a framework that maximises the recycling of Dross internally and demonstrates a regular commitment to finding alternative options to treat, manage Dross waste, and divert from landfill. The internal recycling process operates primarily as a 'closed-loop' system, maximising material recovery for reuse, and the minimisation of waste. A significant volume of Dross (metallic fraction) is currently stored outside the designated storage area. The Entity has initiated remediation efforts, with full cleanup of the material expected to be completed by the end of 2026. This issue was also identified during the recent ISO 14001 audit, resulting in a minor non-conformance being issued. Waste optimisation (including Dross) has been publicly disclosed in the 2024 Sustainability Report, page 113: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity discloses water withdrawal and use by source and type at corporate level in the 2024 Sustainability Report, page 109: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf At the corporate level, water-related risks are identified and disclosed. The Entity however is not identified as a high-risk location. While water scarcity risk is low, the site is implementing efficiency improvements, including 'closed-loop' cooling and planned metering. A Water Management Plan guides operations and is periodically updated, with future revisions linked to regulatory approvals and operational changes. The FY2025 performance statement has been submitted by the Entity and will be disclosed shortly, including water-related parameters. Refer to: https://www.epa.vic.gov.au/permission-information-and-performance-statements
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as the risks identified have been assessed and documented as low. While water scarcity risk is low, a Water Management Plan guides operations and is periodically updated, with future revisions linked to regulatory approvals and operational changes.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Biodiversity risks have been assessed using the Biodiversity & Ecosystem Services Risk Assessment (BESRA) methodology, with action plans developed. These were reviewed during the Audit. Koalas are identified as the highest-priority risk, which is supported by a dedicated management plan, recent updates, and public disclosure through a 2026 factsheet (via the local newspaper). Additional high-risk species (e.g., orchids) are managed through separate plans, with

CRITERION	RATING	COMMENT
		a broader biodiversity study completed in 2025. Biodiversity management is governed by a corporate standard, with a self-assessment required ahead of any upcoming audit.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	Koalas have been identified as the most critical biodiversity issue at the site, with a strong emphasis on transparency in disclosure. A Koala Stakeholder Engagement Plan has been developed and submitted to relevant authorities, including DEECA Victoria and the EPA. The Koala Management Plan Factsheet - 2026 has been disclosed to the Local Community.
8.2a-g Biodiversity Management	Conformance	Based on critical risks identified through the Biodiversity and Ecosystem Services Risk (BESRA) Assessment, dedicated management plans are already in place for key species. Threatened species were initially identified during baseline surveys conducted at the inception of the Facility and are further informed by government-listed species data. Koala Management is one of the most critical issues at the Entity. The Koala Management Plan was incorporated onto the Entity website in June 2022, refer to: https://www.alcoa.com/australia/en/news/releases?id=2022/06/portland-and-aluminium-to-plant-trees-for-koala-habitat&year=y2022 and revised again in June 2023: https://www.alcoa.com/australia/en/news/releases?id=2023/05/portland-and-aluminum-establishes-new-koala-habitat&year=y2023 The corporate level Biodiversity Action Plan is disclosed in the 2024 Sustainability Report, page 96: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
8.3a-c Management of Priority Ecosystem Services	Conformance	Ecosystem Services risks are assessed through BESRA, with priority ecosystems and smelter-related services identified in the Biodiversity Action Plan. Marine biodiversity and freshwater supply have been prioritised, with ongoing studies led by external experts. Habitat provision is supported through koala management and blue gum revegetation beyond buffer zones. Community communication is maintained through 'advertorials' when environmental issues arise.
8.4 Alien Species	Conformance	Invasive species management is embedded in environmental planning, with monitoring of high-risk weeds and control of feral animals through fencing, trapping, and collaboration with authorities. The approach supports protection of native biodiversity, and no timber logs are used for ingot packing.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	Under the <i>Smelter Act</i>, the Portland Smelter is exempted from the <i>Aboriginal Heritage Act 2006</i>, refer to: https://content.legislation.vic.gov.au/sites/default/files/2024-06/80-9434aa015-authorized.pdf Despite this exemption, the Entity has identified three culturally significant areas within the site, and the Gunditj Mirring Traditional Owners have been informed of these locations. The Entity is also engaging with Aboriginal rangers to undertake future cultural heritage surveys within the Facility. As per Alcoa's Policy, areas of high cultural significance are strictly protected and must not be disturbed.

CRITERION	RATING	COMMENT
		In accordance with Victorian legislation, where significant cultural heritage is identified, a Cultural Heritage Management Plan (CHMP) is required, which is prepared in consultation with the relevant Aboriginal Corporation. For low-impact activities, formal permits may not be required, however, the Entity continues to proactively notify the Guditj Mirring Traditional Owners Aboriginal Corporation.
8.6a-d Protected Areas	Conformance	Key biodiversity risks and Protected Areas are identified using IBAT and incorporated into the Biodiversity Action Plan, including areas of federal, local, and high conservation significance. Engagement with the Guditj Mirring Traditional Owners ensures protection of cultural heritage and Protected Areas, supported by regulatory compliance (ACHRS) and planned ranger involvement. The corporate level Biodiversity Action Plan is disclosed in the 2024 Sustainability Report, page 96: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
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	The Entity has implemented the Alcoa Global Human Rights Policy, available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf Along with corporate Policy, the Entity also must comply with Australian Regulations for Human Rights. The Policy is extended to include suppliers, Contractors and Joint Ventures. In the Human Rights Due Diligence completed in 2022, the Entity did not identify any adverse impacts. The Entity has published a Modern Slavery Statement on its website. The Entity's Human Rights Due Diligence is intended to meet the UNGP requirements on Human Rights Due Diligence. The Due Diligence will be updated in 2026 following the ASI requirements. The Human Rights Management Standard includes remedial measures, such as the process for providing remedies for any negative Human Rights impacts and the substantive outcomes that can counteract or mitigate those negative impacts.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has established Policies and processes to ensure respect for the rights and interests of women. The Entity has exceeded established gender diversity targets. Worker interviews with female Workers undertaken during the Audit confirmed there is no Discrimination from supervisors or colleagues. The Entity publicly discloses at the corporate level gender and diversity information in the 2024 Sustainability Report, page 69: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf The Entity has disclosed data on gender representation, including detailed information on hiring, turnover by gender, training and development by gender in the 2024 Sustainability Report Databook:

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		https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.alcoa.com%2Fsustainability%2Fpdf%2F2024-Sustainability-Data-Book.xlsx&wdOrigin=BROWSELINK
9.3a-i Indigenous Peoples	Conformance	As part of the Alcoa Corporation, the Entity has implemented an Indigenous Peoples Policy, a global Indigenous and Land-Connected Peoples Standard and a Cultural Heritage Management Standard. The Policy references the requirements of the International Labour Organisation (ILO) Convention No. 169 on Indigenous and Tribal Peoples, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Interviews with local Indigenous Representatives confirmed the relationship is very respectful between Entity staff and Traditional Owners. The Indigenous Peoples Policy is available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/indigenous-peoples-policy
9.4a Free, Prior, and Informed Consent (FPIC) – New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects. The Entity however has an established a process to consult and cooperate in good faith with Indigenous Peoples on a wide range of issues. This was confirmed by interviews with Traditional Owners undertaken during the Audit. Alcoa has also disclosed its Indigenous Peoples Policy at: https://www.alcoa.com/sustainability/social/human-rights Where Indigenous and other peoples with connections to land are acknowledged by governments, in accordance with the Policy, the Entity will act in accordance with all Applicable Laws and regulations as well as the principle of Free, Prior, Informed, Consent and other tenets of the International Labour Organisation (ILO) Convention No. 169 on Indigenous and Tribal Peoples, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).
9.4b 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	Conformance	This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects. The site is in discussions with the Gunditj Mirring Traditional Owners Aboriginal Corporation to undertake surveys within the Facility, despite the legislative exemption. The Entity has demonstrated the required process for obtaining a permit for minor works to be conducted onsite that may have a limited impact on cultural heritage. This process includes submission of an application, outlining the scope of work and confirming that activities will not adversely affect culturally significant areas, along with engagement with the relevant Aboriginal corporation prior to approval.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has operated since the 1980s with a largely constant footprint, with 63 archaeological sites recorded during initial surveys. All but five of those sites are exempt from the <i>Aboriginal Heritage Act 2006</i>. Avoidance remains the primary principle, with any limited intrusion confined to designated buffer zones. These areas are strictly

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		protected under the <i>Alcoa (Portland Aluminium Smelter) Act 1980</i> and are not disturbed. The Entity has an exemption from the <i>Aboriginal Heritage Act 2006</i> based on the <i>Alcoa (Portland Aluminium Smelter) Act 1980</i> , refer to: https://content.legislation.vic.gov.au/sites/default/files/2024-06/80-9434aa015-authorized.pdf
9.5b Cultural and Sacred Heritage – Impacts	Conformance	The Entity has operated since the 1980s with a largely static footprint, with 63 archaeological sites recorded during initial survey. Avoidance remains the primary principle, with any limited intrusion confined to designated buffer zones. These areas are strictly protected under the <i>Alcoa (Portland Aluminium Smelter) Act 1980</i> and are not disturbed. The Entity has an exemption from the <i>Aboriginal Heritage Act 2006</i> based on the <i>Alcoa (Portland Aluminium Smelter) Act 1980</i> , refer to: https://content.legislation.vic.gov.au/sites/default/files/2024-06/80-9434aa015-authorized.pdf
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no projects where the physical displacement of Communities or people is necessary or relevant.
9.7a-h Affected Populations and Organisations	Conformance	A social risk register is maintained and integrated into the Operational Risk Management (ORM) system, with key risks such as fluoride emissions identified and supported by defined action plans. While site-specific assessments are not fully disclosed, relevant information is included in 2024 Sustainability Report, page 50: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf Key elements of the management approach are communicated to the Local Community. Community engagement includes partnerships with Aboriginal groups, local initiatives, and diversity hiring efforts, including Indigenous recruitment. A formal Community and Stakeholder Engagement Plan guides and monitors engagement activities.
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	Risks relating to Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs) are managed by the Corporate Human Rights and procurement teams through the Responsible Sourcing program, which is disclosed at: https://www.alcoa.com/global/en/contact/supplier/responsible-sourcing-program Human Rights risks in CAHRAs are managed centrally through Alcoa's Responsible Sourcing Program and procurement processes. The Entity conducts Human Rights Due Diligence across suppliers, supported by third-party screening covering risks such as Bribery, Child Labour, trafficking, and conflict minerals. Supplier requirements are governed by Alcoa's Supplier Standards and contractual agreements. The approach aligns with OECD Due Diligence guidance, using various tools for dynamic supplier risk monitoring. Refer to the Responsible Sourcing Framework at: https://www.alcoa.com/global/en/contact/supplier/responsible-sourcing-program

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9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	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 audits, additional questionnaires, training programs, corrective action plans could be required for the suppliers to improve their conformance. Poor DDA results can also lead to rejection of the supplier.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	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 audits, additional questionnaires, training programs, corrective action plans could be required for the suppliers to improve their conformance. Poor DDA results can also lead to rejection of the supplier.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Due Diligence practices were Audited as part of the normal process for ASI Certification against the ASI Performance Standard. In addition, the Entity has established a structured supplier audit program to monitor and verify supplier compliance with its responsible sourcing and Human Rights requirements. This includes risk-based audit planning, where suppliers are prioritised based on their risk profile, geography, and material exposure.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	Alcoa reports annually on its supply chain Due Diligence within its Annual Sustainability Report. For 2024, refer to the 2024 Sustainability Report, pages 33–37: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf
9.9 Security practice	Conformance	Public and private security providers respect Human Rights in accordance with recognised standards and good practices. All Contractors are provided regular training on security practices including training on respecting Human Rights.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity's Human Rights Policy and Code of Conduct both demonstrate the Entity respects the rights of Workers to associate freely in Labour Unions, seek representation and allow for the joining Workers' Councils. Refer to: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/pdf/human-rights-policy/human-rights-policy-en.pdf https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct The Entity complies with Freedom of Association under the <i>Fair Work Act 2009</i> and engages with unions (including the Australian Workers' Union) through Enterprise Agreements. Union membership and participation, including strikes, are voluntary, with no coercion or retaliation observed. Recent industrial action followed prolonged negotiations on pay and job progression, with outcomes was ratified by the Fair Work Commission. Worker interviews confirmed voluntary participation.
10.1d Freedom of Association and Right to Collective Bargaining –	Not Applicable	This Criterion is not applicable to the Entity, as Applicable Law in Australia does not restrict the right to Freedom of Association and Collective Bargaining.

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Alternative means in context of Applicable Law		
10.2a-c Child Labour	Conformance	Whilst the minimum age for employment in Australia is 15 years of age, the Entity requires apprentices to be at least 17 years old, and they are not permitted to operate heavy machinery. Apprentices are also considered as Full Time Equivalent (FTE). The Entity's Human Rights Policy confirms that the hiring practices conform to the International Labour Organization (ILO) conventions for minimum age and Child Labour and applicable local laws. In Victoria, the restrictions for Child Labour are set by the <i>Child Employment Act</i>.
10.3a-c Forced Labour	Conformance	There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators of Forced Labour. Visa checks are also undertaken by the Entity as required. There are legal monitoring requirements to the Australian Department of Immigration and Border Protection. This effectively prohibits any form of Forced Labour. Employee interviews confirmed that there were no indicators of Forced Labour. Employee interviews confirmed that there is complete freedom of movement and that there is no Forced Labour. The Entity has publicly disclosed the Global Modern Slavery Statement with inclusion of Alcoa Portland Smelter, available at: https://www.alcoa.com/sustainability/pdf/2025-Modern-Slavery-Statement.pdf
10.4a-c Non-Discrimination	Conformance	Non-Discrimination is address in the Code of conduct and Equal Employment Opportunity Policy. Both are available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct https://www.alcoa.com/global/en/who-we-are/ethics-compliance/equal-employment-opportunity There are three Group-wide employee resource groups, the Alcoa Women's Network, AWARE (Alcoans Working Actively for Racial-Ethnic Equality) and EAGLE (Employees at Alcoa for Gay, Lesbian [Bisexual and Transgender] Equality). Each group provides information and resources, a support network and organises group activities.
10.5 Communication and engagement	Conformance	The Entity demonstrates open communication and direct engagement with Workers and their representatives. There are numerous mechanisms for Workers to raise issues. Worker interviews confirmed they are aware of these processes and were comfortable with raising issues to Entity management.
10.6a-g Violence and Harassment	Conformance	The Entity's Code of Conduct includes zero tolerance to bullying and Harassment and gender-based issues including sexual Harassment, available at: https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct This has been reinforced by numerous Policies and information posters throughout the Entity. Worker interviews undertaken during the Audit confirmed that there were no workplace issues corporal punishment, mental or physical coercion, Harassment, or gender-

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		based Violence including sexual Harassment, or verbal abuse of Workers.
10.7a-c Remuneration	Conformance	Worker interviews confirmed that salaries are above award rates which are well above a living wage including labour hire and contract staff. Some labour hire arrangements are in place, and these meet the requirements of the <i>Victorian Labour Hire Act 2018</i>. Documentation and Worker interviews confirmed that the Entity makes salary payments promptly for all employees, including labour hire staff and contract staff.
10.8a-c Working Time	Conformance	Worker interviews undertaken during the Audit confirm that the Entity complies with Applicable Law and industry standards on Working Time (including Overtime working hours), public holidays and paid annual leave. Work rosters consist of 12-hour shifts following a structured rotation pattern (2-night shifts, 3 days off, 3-day shifts, 2 days off, followed by 2-night shifts), with supplementary shifts managed through a formal system linked to payroll and restricted by fatigue management controls.
10.9a-b Informing Workers of Rights	Conformance	Workers are informed of their rights during the induction training. Induction training covers workforce operations, communication channels, and escalation mechanisms, including the ethics and integrity hotline managed by the compliance board. Key topics reviewed include the Code of Conduct, inclusion groups, Workers Union, and employee support programs such as the Employee Assistance Program (EAP).
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has developed and implemented an OH&S Management System which is independently certified to ISO 45001:2018.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	Public disclosure of OH&S performance is managed at the corporate level. Health and Safety performance metrics are publicly reported in 2024 Sustainability Report, page 43: https://www.alcoa.com/sustainability/pdf/2024-Sustainability-Report.pdf Additionally, peer analysis is disclosed on the Work Safe Australia website: https://data.safeworkaustralia.gov.au/interactive-data/industry/manufacturing
11.2 Employee engagement on Health and Safety	Conformance	The Entity demonstrates conformance through a structured and cascading safety meeting framework embedded within its Health and Safety Management System. Multiple formal forums are available for workers to raise safety concerns. Health and Safety training is systematically delivered and tracked through Alcoa's Learning Management System. New employees are supported through a tiered competency-based training model.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	17 April 2023	Initial Certification Audit – Full Certification
1	19 December 2024	Surveillance Audit
2	1 July 2026	Re-Certification Audit and Scope Change – Provisional Certification and to apply V3.1 of the ASI Performance Standard