

**Alcoa**

ALCOA OF AUSTRALIA LIMITED

# Modern Slavery Statement 2022

## ACKNOWLEDGEMENT

Alcoa is committed to Reconciliation and recognises and respects the continuing connection to land, water and culture by Aboriginal and Torres Strait Islander Australians. Alcoa acknowledges the Traditional Custodians of the lands where we operate, the Noongar, Wadawurrung and Gunditjmara peoples. We pay our respects to Elders past and present.

## ABOUT THIS STATEMENT

This statement sets out the actions Alcoa of Australia Limited and its controlled entities have undertaken to identify and address modern slavery risks within our business operations and supply chains during the 1 January 2022 to 31 December 2022 reporting period (**Modern Slavery Statement**). It is Alcoa's third Modern Slavery Statement pursuant to section 16(1) of the *Modern Slavery Act 2018 (Cth)* (**Modern Slavery Act**).

All references in this Modern Slavery Statement to Alcoa, the Company, we, us, and our, refer to Alcoa of Australia Limited and its controlled entities, including the reporting entities listed on this page, as a whole.

The definition of modern slavery in the Modern Slavery Act is adopted in this Modern Slavery Statement, which includes slavery, servitude, forced labour, debt bondage, forced marriage, trafficking of persons and organs, deceptive recruitment practices for labour/ services, and the worst forms of child labour.

## REPORTING ENTITIES AND CONSULTATIONS

This Modern Slavery Statement is submitted on behalf of Alcoa of Australia Limited (ACN 000 364 992) (**Alcoa of Australia**), a reporting entity under the Modern Slavery Act and the following reporting entities:

- Alcoa Australian Holdings Pty Ltd
- A.F.P. Pty Ltd
- Alcoa Portland Aluminium Pty Ltd
- Eastern Aluminium Pty Ltd
- Hedges Gold Pty Ltd
- ACAP Australia Pty Ltd
- Eastern Aluminium (Portland) Pty Ltd
- Alcoa Energy Holdings Australia Pty Ltd
- Alcoa Share Plan Administration Pty Ltd

Details of these reporting entities can be found in Appendix A of this Modern Slavery Statement.

This Modern Slavery Statement was approved by the Alcoa of Australia Board of Directors on 22 June 2023. Each of the reporting entities listed above has approved the preparation of this Modern Slavery Statement on their behalf.

More information on our organisation structure and corporate governance can be found in our [2022 Annual Report](#).



# Contents

<b>Our Approach</b>	<b>4</b>
<b>Key highlights from year</b>	<b>5</b>
<b>Our structure and operations</b>	<b>6</b>
Alcoa of Australia Limited	6
Company purpose, vision and values	7
Our purpose	7
Our vision	7
Our values	7
<b>Our operations</b>	<b>8</b>
<b>Key inputs</b>	<b>8</b>
People	8
Physical	8
Natural	8
Financial	8
Social	8
<b>Key outputs</b>	<b>9</b>
<b>Our people</b>	<b>10</b>
<b>Our supply chain</b>	<b>12</b>
<b>Our modern slavery risk profile</b>	<b>14</b>
Modern slavery risks in our operations	14
Modern slavery risks in our supply chain	15
Country risk	15
Category risk	15
<b>Assessing and addressing modern slavery risks</b>	<b>16</b>
Human rights impact assessments	16
Supply chain risk assessments	16
Key corporate governance policies	18
Corporate governance	19
Board oversight	19
Executive oversight	19
Human Rights Council	19
Australian Human Rights Working Group	19
<b>Our due diligence</b>	<b>20</b>
Assess	16
Audit	16
Advance	16
<b>Our grievance mechanisms, incident reporting and remediation</b>	<b>22</b>
Grievance Procedure	22
Integrity Line	22
Remediation	22
<b>Our training</b>	<b>23</b>
<b>Assessing the effectiveness of our actions</b>	<b>24</b>
Independent certification	24
Supplier Sustainability Program	25
Field audits	25
<b>Our stakeholder engagement and collaboration</b>	<b>27</b>
Key engagement with stakeholders	27
<b>Consultation</b>	<b>28</b>
<b>Future actions</b>	<b>29</b>
Responsible sourcing KPI's	29
<b>Appendix A</b>	<b>30</b>
Reporting entities	30

# Our Approach

At Alcoa, we know that respecting human rights across every aspect of what we do is fundamental to the sustainability of our Company and that of our suppliers and customers, as well as to the wellbeing of our stakeholders and host communities.

This Modern Slavery Statement sets out the ways in which human rights considerations are integrated into every facet of our business. Prepared in accordance with the Modern Slavery Act, it highlights the actions we have taken to identify and mitigate modern slavery risks across our operations and supply chains throughout 2022.

Our response to managing the risk of modern slavery continues to be guided by the United Nations Guiding Principles on Business and Human Rights, as well as the United Nations Declaration on the Rights of Indigenous People.

We are ensuring we stay informed of proposed amendments to the Modern Slavery Act including any additional measures to address the issue in Australia and abroad. We are also committed to continuously improving our approach and to improving responsible sourcing practices.

Prepared by our Human Rights Working Group, this Modern Slavery Statement forms part of our annual reporting process and we remain committed to transparency on this complex issue. It was approved by the Board of Directors for Alcoa of Australia Limited on 22 June 2023.

Identifying and managing human rights and modern slavery risks is a key part of our broader sustainability program. Aligned with this, human rights have been identified as a material topic. For more information, see our [2022 Sustainability Report](#).

Having recently commenced in the role as head of Alcoa's Australian operations, I am pleased to be part of an organisation that understands the importance of this issue and remains active and vigilant in ensuring it is addressed in every possible way.



**Matt Reed**  
Vice President Operations – Australia

## Key highlights from year

**No incidents of modern slavery were identified in our Australian operations or supply chains in the reporting period.**



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We updated and expanded our Human Rights Impact Assessment to include Portland, paying particular focus on the effectiveness of our grievance mechanisms for internal and external human rights related concerns.

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We received confirmation of acceptance to join the [Voluntary Principles on Security and Human Rights](#) in March 2022.

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With the support of our colleagues in the Human Rights Council, we continued to embed our new Human Rights Standard within our Australian Operations.

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We intensified our focus on Supply Chain Human Rights and social performance.

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We expanded our 360 Watch program to track and monitor human rights controversies.

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We worked with our suppliers to promote human rights training made available through the Ecovadis Academy.

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We developed our onsite supplier audit program, Supplier Site Collaborations.

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We partnered with TealBook to better understand and identify diversely owned and operated businesses to support our approach to supplier inclusion and diversity.

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We continued our partnership with the Human Rights Resources and Energy Collaborative (**HRREC**) in developing tools and guidance to support the industry and our suppliers in addressing modern slavery.

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We used our new, expanded supplier screening analytics to improve awareness and management of Human Rights risks within our supply base.

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We introduced Human Rights Awareness training to our global Procurement organisation.

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We made a values-based decision in the first quarter of 2022, in response to the conflict between Russia and Ukraine, to cease purchasing raw materials from, and selling our products to, Russia or Russian entities.

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# Our structure and operations

## ALCOA OF AUSTRALIA LIMITED

Alcoa of Australia is owned by Alcoa World Alumina and Chemicals (**AWAC**), an unincorporated global joint venture between Alcoa Corporation and Alumina Limited. Alcoa Corporation owns 60 per cent, and Alumina Limited owns 40 per cent, of AWAC.

Our Australian operations are headquartered in Perth, Western Australia.

More information on our organisation structure and corporate governance can be found in our [2022 Annual Report](#)

Alcoa Corporation is the parent company of Alcoa of Australia Limited. Our policies and the Supplier Sustainability Program apply across all entities controlled by Alcoa Corporation.

Alcoa is an integrated, upstream aluminium company, mining bauxite, refining alumina, and smelting and casting aluminium. Alcoa's legacy dates to the invention in 1886 of the commercial process that allowed aluminium to be produced in an economical way, transforming society. Through innovation and hard work, we launched an industry. Our employees are carrying forward our Company's legacy of innovation, working to provide the materials the world needs today and in the future. Our inclusive and values-based culture is the perfect environment for Alcoa to shape our world and transform ideas into impact for the benefit of our business and the communities in which we operate.

Globally, Alcoa Corporation has ownership in seven active bauxite mines, seven refineries, 13 smelters and six energy assets. During the reporting period, Alcoa had more than 13,000 employees globally and generated US\$12.45 billion in sales revenue.

### EXPLORATION AND PLANNING



Potential mining areas identified, key environmental, cultural and social areas protected or managed.

### CLEAR AND MINE



Timber harvested and utilised, topsoil preserved, bauxite mined.

### REHABILITATE LAND



Mined land rehabilitated, self-sustaining ecosystems re-established.

## COMPANY PURPOSE, VISION AND VALUES

### Our purpose

*To turn raw potential into real progress*

Our purpose informs every goal we set, decision we make, action we take and strategy we implement. It supports our goal to unlock the true potential of our people, products and processes to create value and move our Company and industry forward.

### Our vision

*To reinvent the aluminium industry for a sustainable future*

Our vision inspires our work — it influences how we produce products, develop new processes, and interact with suppliers, customers and communities. This vision also helps inspire our work on a roadmap of breakthrough technologies that have the potential to differentiate Alcoa and decarbonise the upstream aluminium value chain.

### Our values

- Act with integrity - Operate with excellence
- Care for people - Lead with courage

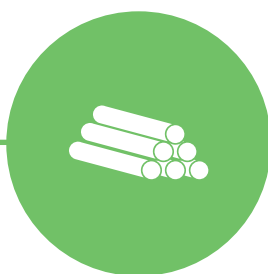
Our values are clear and concise, setting the expectation for how we endeavour to operate around the globe, in every aspect of our business and in every market.

REFINE  
ALUMINA



Using the Bayer process, bauxite refined to produce alumina.

SMELT  
ALUMINIUM



Alumina used in smelting process to create aluminium.

RETURN  
LAND



Work with stakeholders to allow access to restored areas and hand back land to the State.

## OUR OPERATIONS

We have been operating in Australia for 60 years. Each year, Alcoa mines approximately 34 million dry metric tonnes of bauxite, refines approximately nine million tonnes of alumina, and produces approximately 330,000 tonnes of aluminium within Australia. We produce approximately 50 per cent of Australia's alumina and more than 20 per cent of Australia's aluminium. Our alumina production in Western Australia accounts for approximately 6 per cent of total world production.

Our Australian operations include:

- Two bauxite mines in Western Australia (Huntly and Willowdale)
- Three alumina refineries in Western Australia (Kwinana, Pinjarra and Wagerup)
- One aluminium smelter in Victoria (Portland)
- Two dedicated port facilities in Western Australia (Kwinana and Bunbury)
- Two Alcoa Farmlands sites in Western Australia (Pinjarra and Wagerup)

In Western Australia, we extract bauxite at our Huntly and Willowdale mines and conduct world-class rehabilitation in those areas. The extracted bauxite is transported to one of our three refineries located at Kwinana, Pinjarra and Wagerup, where it is turned into alumina. This alumina is shipped to smelters around the world, including our Portland Smelter in Victoria, where it is turned into aluminium.

We are also overseeing the ongoing decommissioning, remediation and/or rehabilitation of an aluminium smelter, coal mine and power station.

[Our website](#) explains more about our business, including our strategy, projects and operations, locations and our sustainability approach.

## KEY INPUTS

**People:** Our global workforce is made up of both employees and contractors, and is our most important resource, providing the skills, experience and technical expertise required to run our business. Our people help to build and maintain our intellectual property including organisational knowledge, systems and processes required to undertake our business activities.

**Physical:** We have a suite of assets including mines, refineries, smelters and associated infrastructure which we focus on running safely and reliably. We procure equipment from suppliers globally to support our operations, development options and exploration programs.

**Natural:** The natural resources we access, including land, water and energy, are the primary inputs for our business.

**Financial:** Our shareholders and lenders provide access to financial capital which we put to work by operating our existing facilities and funding our pipeline of development options and exploration programs.

**Social:** The relationships we have with communities, government agencies and other stakeholders, alongside our reputation, are essential to our social licence to operate and ensuring we are a sustainable business.



**KWINANA**  
Bindjareb  
country

**PINJARRA**  
Bindjareb  
country

**WAGERUP**  
Bindjareb  
country

**HUNTLY**  
Bindjareb  
country

**WILLOWDALE**  
Bindjareb  
country

**BUNBURY**  
Wardandi  
country



**ALCOA'S  
OPERATIONS  
INCLUDE:**

Two bauxite  
mines

**in Western Australia  
(Huntly and Willowdale)**

Three  
alumina  
refineries

**in Western Australia  
(Kwinana, Pinjarra,  
and Wagerup)**

One  
aluminium  
smelter

**in Victoria (Portland)**

Two  
dedicated  
port facilities

**in Western Australia  
(Kwinana and Bunbury)**

Farmlands

**Farmlands in Western  
Australia (Pinjarra and  
Wagerup)**

**KEY OUTPUTS**

Since 1963, we have invested more than AU\$14.7 billion in Australia. In 2022, 84 per cent of our annual revenue stayed in Australia via wages, local spend, taxes, royalties and shareholder dividends.

More specifically, in 2022 our Australian operations:

- Invested AU\$2.6 billion with 1,560 Australian suppliers
- Paid AU\$425 million in local, state and federal government taxes and royalties
- Paid AU\$763 million in Australian wages, salaries and associated benefits
- Contributed AU\$4.9 million to local communities

We are also one of Australia's leading exporters, contributing around AU\$5 billion in exports each year.

Generating this value allows local and regional communities to thrive and entrenches our position as a key contributor to the communities in which we operate.

**PORTLAND**  
Gunditjmara  
country

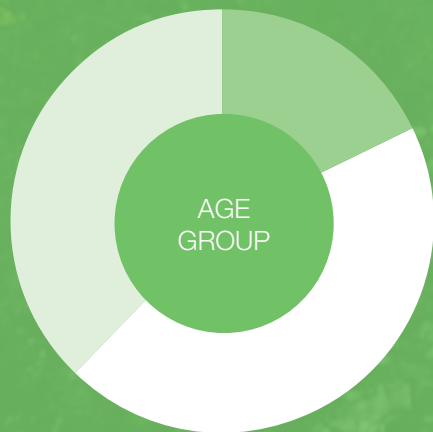
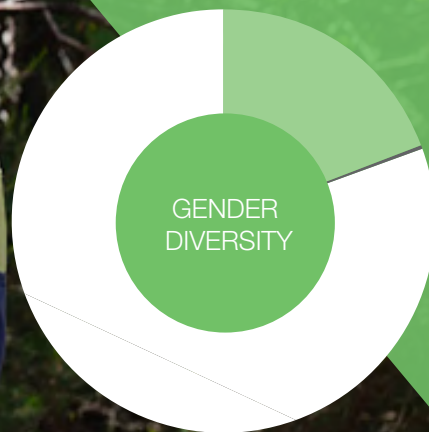
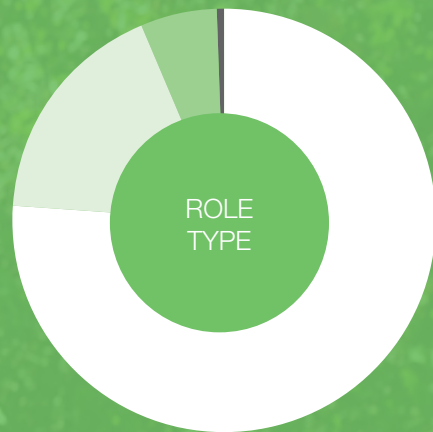
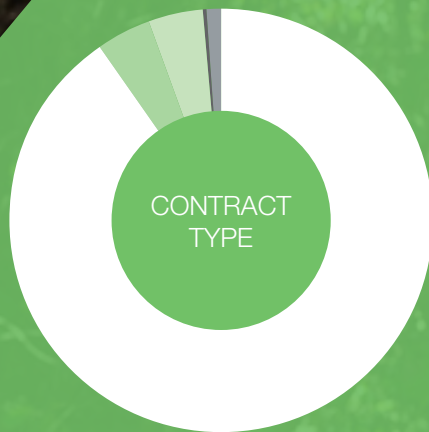
# Our people

**In 2022, Alcoa's operations supported approximately 4,850 direct jobs, predominantly located in regional Western Australia and Victoria (making up 37 per cent of Alcoa's total global workforce).**

Of those employees, approximately 99 per cent are employed on a permanent or fixed term basis. We recruit employees using our own internal teams and do not rely on the services of overseas recruitment agencies, thus reducing risks relating to debt bondage.

Approximately 77 per cent of our Australian workforce is employed under industrial agreements and the remainder on individual contracts.





# Our supply chain

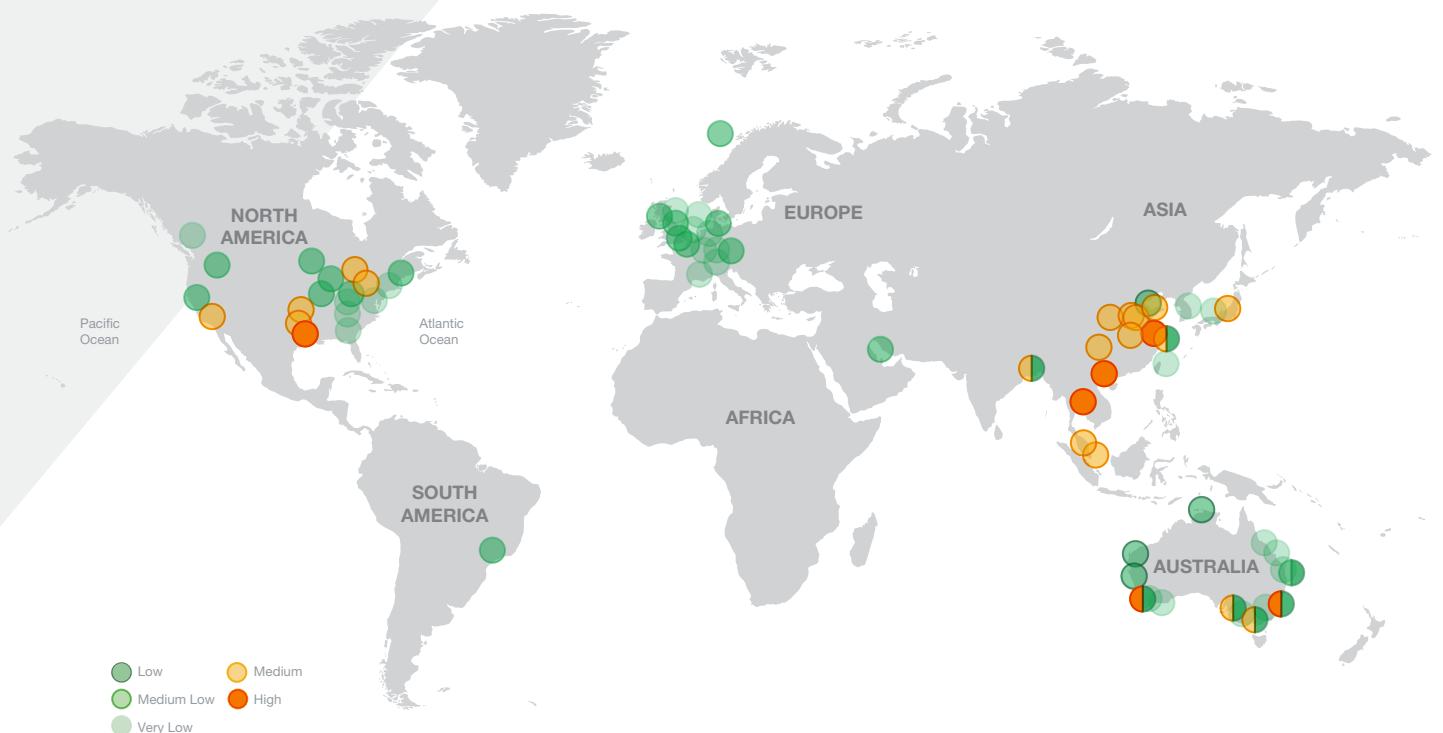
Alcoa's supply chain is managed by our procurement and commercial teams, reporting globally to our Chief Commercial Officer. Our approach to responsible sourcing and supplier sustainability across the value chain is managed by our Director Responsible Sourcing. Our procurement practices support our entire product lifecycle, through exploration, mining, refining, smelting, waste and residue management, rehabilitation, warehousing and transportation.

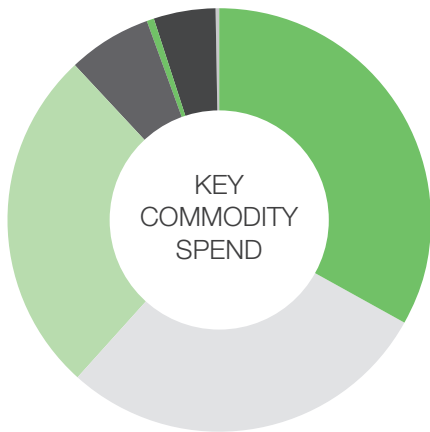
In 2022 in Australia, Alcoa had 2,061 suppliers, representing around 20 per cent of our global supplier footprint.

Our Australian suppliers form part of our global supply chains, with goods and services also coming from key hubs across North America, Brazil, Europe and Asia.

In keeping with Alcoa's commitment to develop and contribute to the communities in which we operate, during the reporting period, 68 per cent of our Australian procurement spend was to Western Australian suppliers. There was an 800 per cent increase in our procurement spend from 2021 to Indigenous-owned and operated businesses. This impact is testament to our commitment to creating sustainable value, and evidence of how our local supplier policies and community partnerships, such as the Waalitj Foundation partnership, create sustainable change.

Our Supplier Sustainability Program applies to all suppliers, contractors and other entities with which we do business. Our program focuses on our direct supply chain (**Tier 1 Supply Chain**) and includes the assessment of the practices and audits our Tier 1 Supply Chain suppliers apply to their own supply chains (**Tier 2 Supply Chain**).





● Indirect Materials and Services	33.24%
● Strategic Materials	28.54%
● Energy	26.45%
● Corporate	6.45%
● Capital	0.48%
● Transportation	4.65%
● Other	0.19%

### MAJOR SPEND CATEGORIES

- Process chemicals
- Hydrocarbons
- Civil and mining support services
- Labour hire
- Site maintenance services
- Waste management

### MAJOR SOURCING COUNTRIES OUTSIDE OF AUSTRALIA

- Thailand
- Malaysia
- Singapore
- India
- China



## WAALITJ FOUNDATION

Alcoa Foundation and Waalitj Foundation formed a partnership in 2021 with the aim of boosting business opportunities for Indigenous Australians in the Kwinana, Peel and Upper South West regions of Western Australia. In 2022, that partnership was extended to include supporting opportunities for employment. The funding supports the Waalitj Hub business events and services, and the Plan 2Day 4 2morrow (P242) employment program. The P242 program seeks to address the significant gap in employment for Indigenous peoples in Australia. From February 2022, the program successfully engaged 120 Indigenous jobseekers across Western Australia, helping develop their skills and work readiness. The Waalitj Hub business events build capacity and connections for existing and emerging Indigenous businesses.



## BEYOND OUR TIER 1 SUPPLY CHAIN

With a significant portion of Alcoa of Australia's spend being in the form of indirect materials and services within our Tier 1 Supply Chain, our Tier 2 Supply Chain becomes very fragmented and diverse. Given this, our focus is on working with our Tier 1 Supply Chain suppliers to develop their own responsible sourcing approach. As a result, 42% of our audited Australian suppliers have established Corporate Social Responsibility auditing/ assessment of their supply chains.

# Our modern slavery risk profile



**Alcoa of Australia acknowledges the potential for modern slavery to occur both in our operations and across our supply chain. Managing our modern slavery risk is part of our broader human rights approach.**

During the reporting period, we engaged with our workforce and suppliers to strengthen our practices to identify the risks of modern slavery in our operations and supply chain.

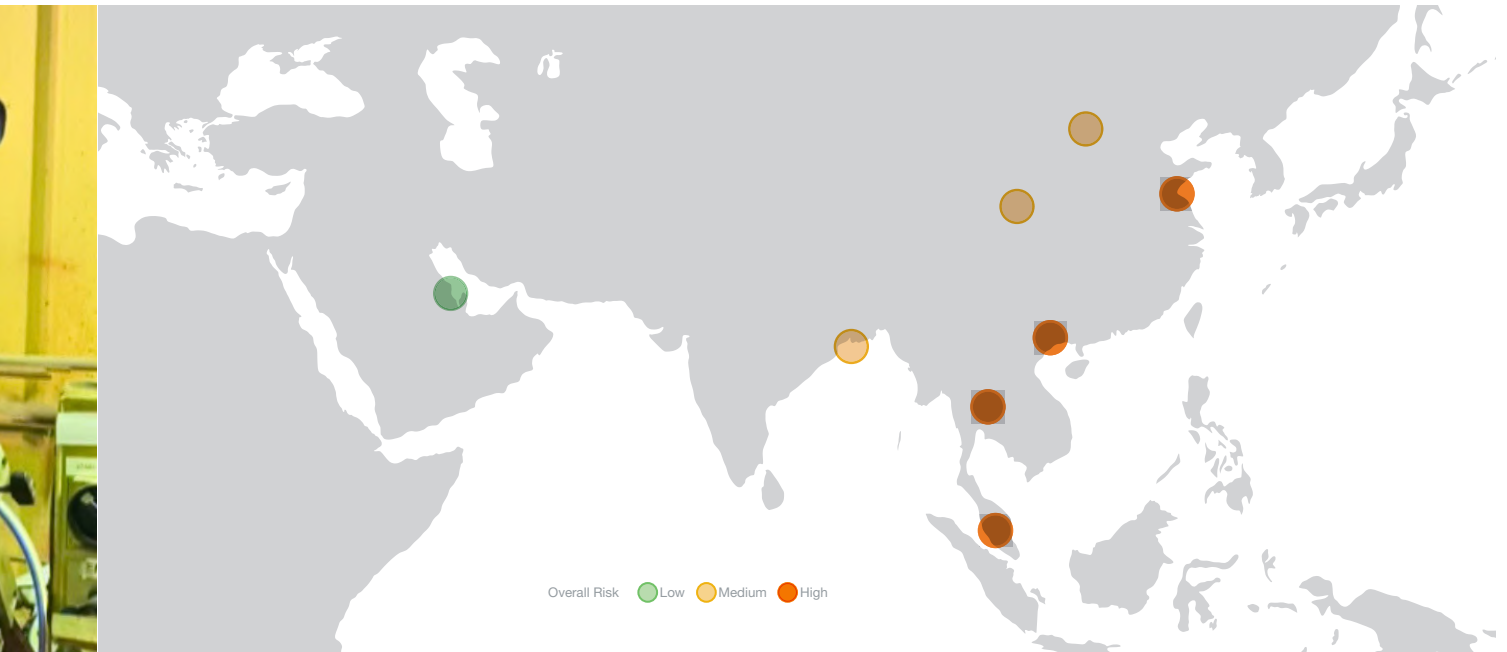
We will continue to assess and address modern slavery risks in our operations and supply chains in line with the Modern Slavery Act Guidance for Reporting Entities. In assessing our risk of involvement in modern slavery, Alcoa uses the United Nations Guiding Principles on Business and Human Rights concepts of cause, contribute and directly linked where:

- A company may *cause* the impact through its own operations;
- A company may *contribute* to the impact, for example through unrealistic expectation of a contractor or supplier that can only be met using exploited labour; or
- A company may be *directly linked* to modern slavery through a third-party contractor or investment (for example, if the third party engages forced labour despite safeguards in place).

We recognise that our modern slavery risk profile is continuously evolving. Our modern slavery risks arise due to the nature of the products and services we procure, the social and political context where we work and source from, and the suppliers and contractors with which we engage.

## MODERN SLAVERY RISKS IN OUR OPERATIONS

Alcoa of Australia's operating assets are all within Australia, which the [Global Slavery Index 2023](#) ranks as having one of the strongest government responses to modern slavery due to its robust labour laws and enforcement mechanisms. The Global Slavery Index 2023 notes that businesses have increasingly complex global supply chains that lack transparency, indicating that we are at greater risk of modern slavery within our global supply chain than within our Australian operations.



The risks of modern slavery in our operations are further reduced by the Human Rights Management Standard which sets out a number of requirements to address modern slavery risks.

## MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

In 2022, approximately 66 per cent of the goods and services we procured came from suppliers operating within Australia. While our supplier relationships have a strong Australian focus, we acknowledge that the raw materials and manufacturing of what we buy is often global in origin. This introduces the risk that goods, services and raw materials may be sourced from regions where there is a more vulnerable workforce, including low and semi-skilled workers and/or migrant workers.

We recognise that modern slavery risks still exist in our Australian supply chain. These risks generally relate to a lack of awareness and acceptance of modern slavery risks, particularly in small to medium enterprises that are still developing their management capability and understanding of labour standards.

Modern slavery is assessed as part of the Social and Human Rights pillar of our Responsible Sourcing Framework, which is outlined in the [Supplier section of our website](#). Our Responsible Sourcing Program is an intelligence and risk-based framework integrated into how we identify, select and manage the goods and services we procure. We use industry leading ESG intelligence providers such as EcoVadis, Trace International and MK Denial to integrate ESG criteria into our supplier category strategies, tenders, selection processes, contract key performance indicators, performance management and supplier monitoring.

In 2022, our major spend categories, higher risk inputs and higher risk countries of origin remained consistent with 2021 data.

### Country risk

We recognise that modern slavery risks exist in every country. In 2022, some of our direct suppliers operated in countries with a higher prevalence of modern slavery according to the Global Slavery Index (2023). From our Step 1 assessment of our supply chain, our highest risk countries for modern slavery in our Australian Supply Chain are China, Indonesia, Vietnam, Oman and India. Please note that as of March 2022, Alcoa no longer operates with entities associated with Russia<sup>1</sup>.

In line with the London Metal Exchange's (LME) responsible sourcing requirements, key direct and raw materials suppliers are assessed to understand where material is sourced to identify any conflict-affected or high-risk areas (CAHRAs).

### Category risk

Further to our Step 1 assessment of our supply chain, we can identify that the following products/industries present the highest risks of modern slavery in our Australian supply chain:

- Caustic soda
- Refractories
- Cathode production
- Lime
- Alloying metals
- Calcined coke pipes, valves and fittings
- Packaging

The most prevalent modern slavery risks in our supply chain are likely to be forced labour, child labour, freedom of association, freedom of movement, fair wages, working hours, health, safety and hygiene, discrimination and harassment, and land rights.

**Maritime:** The maritime transport of goods to support our operations (inbound) and deliver our finished products to customers (outbound) is globally recognised to represent a higher degree of risk of modern slavery to seafarers. This risk comes in the form of seafarers often being from countries of higher human rights, ethics and corruption risks. The nature of the shipping industry often involves vessel owners and operators being different entities, and the vessel's flag state determining the regulations applicable to its crew.

We have controls in place to manage modern slavery risks across our inbound and outbound supply chains. For our Australian operations, whilst we do not own ships or directly employ seafarers, we screen ship owners through our Assess process and require all vessels entering port to complete our maritime pre-berthing declaration which includes specific questions around last port of call, seafarer time at sea and last crew changeout date. We also collaborate and actively support seafarer welfare through the relevant seafarers' associations.

<sup>1</sup>[Alcoa statement on Russia-Ukraine Crisis](#)

# Assessing and addressing modern slavery risks

**Alcoa takes a systematic approach to assessing and managing human rights and modern slavery risks in our operational activities and supply chain. We aim to continuously improve our governance, systems and processes to better identify, assess and address modern slavery risks across our business and supply chain.**

Alcoa did not find any evidence of modern slavery in our operations or supply chain in 2022.

We remain vigilant and ensure each of our operations must ensure they understand their potential and actual human rights risks and impacts. To assess and update their understanding, we use a number of tools and research methods including stakeholder engagement, complaint and grievance mechanisms, risk assessments, and human rights impact assessments (HRIA).

## HUMAN RIGHTS IMPACT ASSESSMENTS

In 2022, HRIAs were undertaken by an independent third party for all our Australian operations. The HRIAs found that both the inherent and residual modern slavery risks within our operations were low and our controls were well established.

Improvement opportunities identified in the 2022 assessment have been integrated into an action plan that is overseen by our Human Rights Council and implemented by our regional Human Rights Working Group.

## EMPLOYMENT PRACTICES

Risks of slavery or servitude are well regulated under Australian laws. For instance:

- The *Commonwealth Fair Work Act 2009* includes protections to ensure that employment arrangements do not disadvantage employees in relation to the minimum wage in Australia
- Minimum age standards are comprehensively regulated at the federal and state level

Alcoa complies with all local applicable laws and regulations relating to hiring children and our hiring practices conform with International Labour Organisation (ILO) conventions for minimum age and child labour. Alcoa's Australian operations do not employ people under the age of 18 - unless under a formal apprenticeship arrangement for people aged 16 years and over, in line with employment regulations - or support the use of child labour. All Alcoa employees are required to provide identification documents that confirm their age and visa status as a condition of employment.

Our Human Rights Management Standard provides another layer of protection, ensuring that modern slavery risks are reduced by establishing requirements such as minimum age for hazardous work.

## SUPPLY CHAIN RISK ASSESSMENTS

We assess human rights risks in our supply chain through our Responsible Sourcing Framework, which integrates the intelligence from our Supplier Sustainability Program into our procurement practices. As outlined below in our Supplier ESG Risk Decision Tree, suppliers are risk assessed in Step 1, across 21 criteria covering environment, social (including human rights) and governance. The assessment process utilises the EcoVadis IQ platform, and EcoVadis' 360 watch module to continuously monitor and assess our supply chain and informs the next steps in due diligence to manage risk.

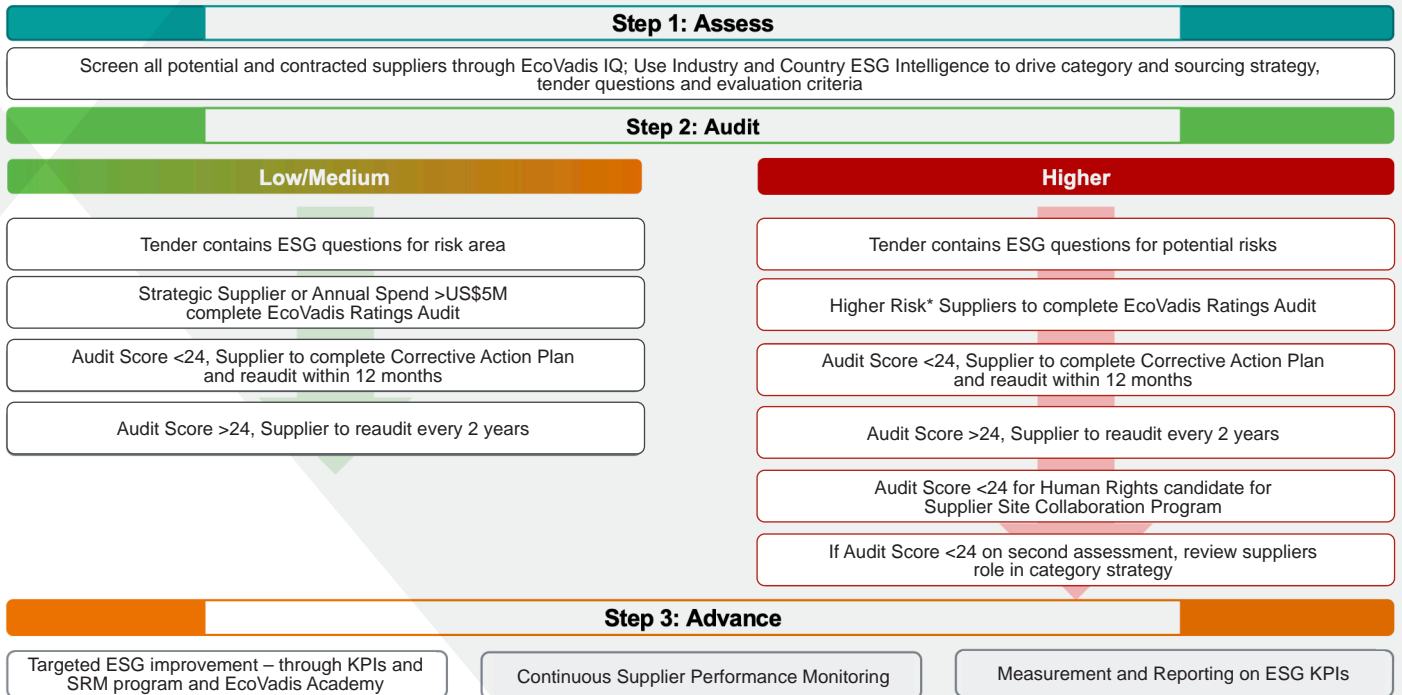
Step 1: Assess is used to screen suppliers against global sanctions, denied parties and convictions, and given an ESG risk potential based on their industry of service, countries of operation (including subsidiaries), and procurement specific data including supplier relationship and criticality of supply. Human rights specifically make up 25 per cent of the risk potential calculation and utilise health, social and human rights global indices, industry materiality and intensity factors, and supplier monitoring intelligence, backed by EcoVadis' 15 years of observed industry performance. The risk assessment from Step 1 determines the path of further due diligence required.





## SUPPLIER ESG RISK DECISION TREE

### Responsible Sourcing framework



## KEY CORPORATE GOVERNANCE POLICIES

Respect for human rights is fundamental to the sustainability of Alcoa and the communities in which we operate. Our Human Rights Policy and Code of Conduct and Ethics form the foundation of our approach to managing human rights risks.

Through our Human Rights Policy, we acknowledge our responsibility to respect human rights and establish the correct due diligence mechanisms to make the policy effective. The policy is aligned with, and refers to, international human rights principles encompassed in the United Nations Universal Declaration of Human Rights, the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

Key policies and governance procedures include:

### Human Rights Policy

Our Human Rights Policy applies to every employee, supplier, sub-contractor and business partner with whom we engage. The Human Rights Policy prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking.

Our Human Rights Policy is available on our website and intranet.

### Code of Conduct and Ethics

Our Code of Conduct and Ethics sets forth expectations regarding how we conduct business worldwide, consistent with our values and applicable laws and regulations.

Our Code of Conduct and Ethics is available on our website and intranet.

### Human Rights Management Standard

Our Human Rights Management Standard sets out the ways in which our functions, locations and corporate entity integrate human rights considerations into existing management practices and mechanisms. It requires all locations to identify, prevent, mitigate and report any actual or potential human rights impacts as a result of their business activities. The standard also sets out the requirements for effective remediation should we cause or contribute to an actual human rights impact.

Our Human Rights Management Standard is available on our intranet for all employees.

### Supplier Standards

Our Supplier Standards embody our values and the expectations we have for our suppliers, contractors and others with whom we do business.

Our Supplier Standards is available on our website and intranet.

### Integrity Line

We are committed to identifying, preventing and mitigating adverse human rights impacts related to our business activities by maintaining operational grievance mechanisms that are transparent and accessible across the communities in which we operate.

Information on the Integrity Line, including local contact details for each jurisdiction where we work, is available on our website and intranet.

### Responsible Sourcing Framework and Supplier Sustainability Program

Our Responsible Sourcing Program and Supplier Sustainability Program is an intelligence and risk-based decision framework integrated into how we identify, select, contract and manage the goods and services that we procure.

More information on our Responsible Sourcing Program and Supplier Sustainability Program is available on our website.

### Anti-Retaliation Policy

Alcoa's Anti-Retaliation Policy protects employees from retaliation so that they will speak up when they see or suspect illegal or unethical conduct, or when they cooperate in internal or governmental investigations.

Our Anti-Retaliation Policy is available on our intranet.

### Risk Management Framework

We assess the risk of modern slavery in our operations and supply chains in accordance with our risk management framework. With Enterprise Risk Management and Operational Risk Management, we have comprehensive processes to identify and evaluate a broad spectrum of risks across all aspects of our business.

Information on our Risk Management Framework is included in our [Sustainability Report](#) available on our website.

### Anti-Corruption Policy

Alcoa Corporation is committed to conducting all its operations around the globe ethically and in compliance with all applicable laws. Vigilance in complying with anti-corruption and anti-bribery laws, such as those based on the OECD Convention and the U.S. Foreign Corrupt Practices Act, is critical to our operations. Alcoa's Anti-Corruption Policy and corresponding Procedures (Due Diligence and Contracting Procedure for Intermediaries; Gifts, Hospitalities, and Travel Procedure; and Charitable Contributions Procedure) prohibit Alcoa, or any third party acting on Alcoa's behalf, from offering, promising, authorising, or paying anything of value to any government official or any other person or entity including those in the private or commercial sector, where it is intended to induce the recipient to misuse their position or to obtain an improper business advantage.

Our Anti-Corruption Policy is available on our website and intranet.



## CORPORATE GOVERNANCE

Modern slavery is a material risk to our business and is managed by functional teams across Alcoa. The day-to-day oversight and coordination of human rights activities are undertaken by our Sustainability, Procurement, Human Rights, Ethics and Compliance, Security and Legal teams.

### Board oversight

Alcoa's corporate governance structure consists of a Board of Directors (**Board**), whose role is to exercise their business judgment and act in what they reasonably believe to be the best interests of the Company and its stakeholders.

Alcoa's Board has created a Safety, Sustainability and Public Issues Committee to provide guidance on matters relating to corporate and social responsibility including human rights risks. This includes overseeing, and providing advice on improvements to, the Company's initiatives, policies and practices to promote alignment with, and the achievement of, the Company's values, and advising the Board and management on significant public policy issues that are pertinent to the Company and its stakeholders.

For more information, please see Alcoa's [Corporate Governance Guidelines](#).

### Executive oversight

Alcoa's Board is ultimately responsible for ensuring appropriate procedures are in place to identify, assess, manage, remediate and report any modern slavery risks to comply with the Modern Slavery Act.

In 2021, Alcoa created a Sustainability Governance Board comprised of Executive Team members to ensure we appropriately integrate sustainability priorities within the enterprise strategy and drive sustainable business growth and value creation. The Sustainability Governance Board approves sustainability strategies, evaluates results toward targets, and manages sustainability risks including modern slavery and broader human rights risks.

Our Vice President of Global Procurement and Transportation has responsibility for assessing and managing modern slavery risks within our supply chain. Our Chief Human Resources Officer is responsible for managing modern slavery risks within our business.

### Human Rights Council

The Human Rights Council oversees compliance with applicable United Nations Guiding Principles for Business and Human Rights, and the ILO's fundamental conventions. Members of the Company's global Executive Team sponsor the Human Rights Council which is co-chaired by the Vice President, Sustainability and the Chief Ethics and Compliance Officer.

Our Human Rights Council defines and implements management systems that enable us to respect and support individual and collective human rights affected by our operations. The Human Rights Council includes representatives from each region, including Australia, and key resource functions. More information on how Alcoa manages Human Rights can be found on the Human Rights section of the [Alcoa 2022 Sustainability Report](#).

### Australian Human Rights Working Group

Throughout 2022, we maintained a Human Rights Working Group in Australia, which brings together legal, government affairs, human resources, procurement, finance and sustainability expertise to help assess and respond to key risks (the **Australian Working Group**).

The Australian Working Group reports to the Human Rights Council and implements initiatives and improvements identified in the Human Rights Impact Assessment. The Board of Alcoa is also represented on the Australian Working Group.

# Our due diligence

We continually evaluate and review how best to strengthen our approach to addressing human rights.

Our Responsible Sourcing Framework integrates our Supplier Sustainability Program, through our ESG Supplier Decision Tree, providing supply chain due diligence and development in line with the OCED guidelines for addressing Human Rights in Business. It is annually audited as part of our ICMM, LME and ASI certification processes. The framework comprises three pillars: Assess, Audit and Advance.

**Assess:** Using the **EcoVadis IQ** platform, we first assess our supply chain and supply chain source materials for ESG risk with consideration of industry, countries of operation (including CAHRAs) and criticality of supply. Next, we undertake due diligence of a supplier through a Denied Parties Screening (DPS) process via **MK Denial**. This ensures we are not doing business with suppliers that are listed on denied parties lists and/or have sanctions against them. Based on results, we may ask some suppliers to complete a **TRAC** profile through Trace International. A TRAC profile comprises a due diligence assessment addressing bribery and corruption, bankruptcy, criminal history, trade compliance, ethics, conflict minerals.

**Audit:** Based on our ESG Risk Decision Tree outlined in our approach to Responsible Sourcing, we ask suppliers to further describe their sustainability journey by completing the **EcoVadis Ratings** audit (Stage Two Due Diligence). This digital, evidence-based audit is specific to the ESG risks associated with a supplier's industry and countries of operations. It covers policies, procedures, endorsements, measures, certifications, maturity, KPIs and reporting across 21 criteria.

Our onsite human rights audit framework, referred to as our Supplier Site Collaboration Program and developed in 2022, identifies suppliers that may present higher human rights risks due to their industries, countries of operation, ESG maturity, EcoVadis 360 Watch findings and other factors based on the results from the Stage 2 (Audit) due diligence. The program will be implemented in 2023. The program uses the **Response & Remedy Framework** developed by the Human Rights Resources and Energy Collaborative in partnership with **Walk Free**.

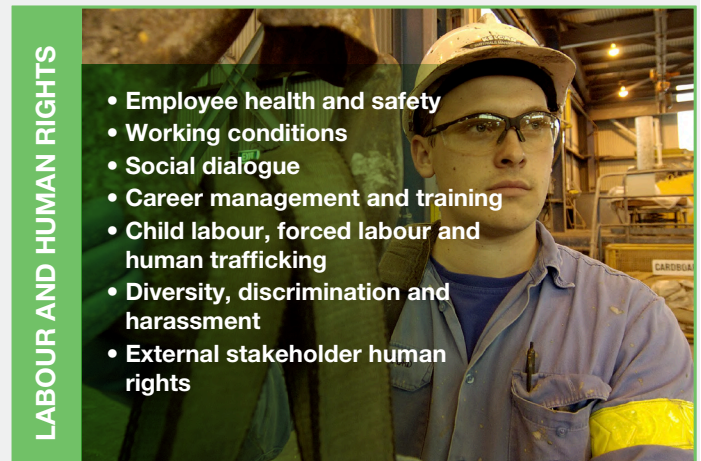
**Advance:** Working with our suppliers to advance sustainably is core to Alcoa's values. Through our integrated approach to responsible sourcing and our Supplier Sustainability Program, we help our suppliers implement both general and specific improvement plans, set key performance objectives and develop strategic partnerships to manage risk and create long-term value.

## SUPPLIER ASSESSMENT CRITERIA



**ENVIRONMENT**

- Energy consumption and greenhouse gases
- Water
- Biodiversity
- Local and accidental pollution
- Materials, chemicals and waste
- Product use
- Product end-of-life
- Customer health and safety
- Environmental services and advocacy



**LABOUR AND HUMAN RIGHTS**

- Employee health and safety
- Working conditions
- Social dialogue
- Career management and training
- Child labour, forced labour and human trafficking
- Diversity, discrimination and harassment
- External stakeholder human rights



**ETHICS**

- Corruption
- Anticompetitive practices
- Responsible information management



**SUSTAINABLE PROCUREMENT**

- Supplier environmental practices
- Supplier social practices

We specifically engage and partner with suppliers that score below 25 on the 100-point EcoVadis Ratings audit (Stage 2 (Audit) Due Diligence) to develop and implement an improvement plan that is supported by the **EcoVadis Academy**. Available to suppliers that complete the EcoVadis Ratings audit, this online, on-demand learning portal offers learning modules that include:

- Understanding human rights risks and implementing an effective grievance mechanism
- Scope 1, 2 and 3 emissions calculations
- Reporting and developing a decarbonisation plan
- ESG reporting guidelines

The last part of our Supplier Sustainability Program is the continuous monitoring of suppliers through 360 Watch. 360 Watch is part of the EcoVadis platform and monitors positive and adverse media, and human rights controversies from over 100,000 sources. Findings identified through the 360 Watch process are reviewed by EcoVadis with a materiality assessment given and, if applicable, can result in a change to a supplier's EcoVadis Rating.

Governing our due diligence is a suite of analytics developed inhouse which provide transparency over supplier risk outcomes, governance to the program, and enable key supplier and category insights to inform key performance indicators in our Supplier Relationship Management approach.

In 2022, we enhanced our analytics suite to capture and track human rights controversies identified through the 360 Watch platform. Identified controversies are classified as safety, working condition, modern slavery, social or governance related, with our response informed by EcoVadis' materiality assessment of the controversy. As a result of the controversy, a supplier's Assess risk rating may change and/or their EcoVadis Audit score may be amended. Our responses include review by our Ethics and Compliance team, engagement through our Supplier Relationship Management program, an improvement plan or, from 2023, an onsite audit through the Supplier Site Collaboration program.

# Our grievance mechanisms, incident reporting and remediation

## GRIEVANCE PROCEDURE

We are committed to identifying, preventing and mitigating adverse human rights impacts related to our business activities by maintaining operational grievance mechanisms that are transparent and accessible across the communities where we operate.

To contemporise the existing practices of complaints management and ensure that regional processes are in line with the Global Social Performance Standard, an Australian regional grievance procedure is currently in development (**Regional Grievance Procedure**). Feedback from the communities in which we operate is key to the initial inputs into this Regional Grievance Procedure.

In alignment with the UN Guiding Principles on Business and Human Rights, the Aluminium Stewardship Initiative, and International Council of Minerals and Metals, the Regional Grievance Procedure seeks to engage early with its users.

To date, community co-design sessions have been held with a number of local Aboriginal organisations. The advice from these groups has been valuable in addressing several areas of the Regional Grievance Procedure, including barriers to access, clarity of timelines for resolving issues raised, and areas of the Regional Grievance Procedure where cultural considerations can be better considered to ensure accessibility and equity.

Following internal reviews of this Regional Grievance Procedure, it will be rolled out across all Alcoa's Australian locations, in addition to networks that represent the communities in which Alcoa works. The Regional Grievance Procedure provides an effective way to build trust within our communities and as such, a consistent regional approach will allow our communities – many of which cross over operations in other locations – to better understand that Alcoa has a legitimate process for raising complaints, getting them investigated and resolved, and having avenues for appeals.

## INTEGRITY LINE

We encourage employees and external stakeholders, including suppliers and their employees within our supply chain, who have ethics-related questions or concerns or want to report suspected breaches of laws, policies or our values, to do so through our confidential [Integrity Line](#). Calls are free of charge and are accessible 24/7 in multiple languages. Reports can be submitted anonymously by phone or online.

Access to the Integrity Line is publicised via multiple internal and external channels, including our website, corporate policies and procedures, and via displays at all our locations.

All issues and concerns reported through the Integrity Line are directed to our global Ethics and Compliance team for follow-up using the following procedures:

- The reporter is given a private code that they can reference for investigation status updates. The reporter can obtain updates by calling the Integrity Line, checking the web reporting site or contacting the investigator directly.
- The Ethics and Compliance team conducts an initial review of the matter to determine the most appropriate method of investigation. Where appropriate, the Ethics and Compliance team sends the matter directly to the relevant Alcoa location for investigation. Investigations that are not appropriate for the location to handle are retained for investigation by the Ethics and Compliance team.
- Investigations are handled promptly, thoroughly and confidentially.
- If not anonymous, the identity of the reporter is kept strictly confidential throughout the process and only disclosed to authorised persons when necessary to carry out the investigation or as otherwise required by law.

A final determination is made as to whether the allegation or concern was substantiated or unsubstantiated. The response to substantiated matters is determined on a case-by-case basis. It is tailored to the seriousness of the substantiated facts.

No incidents of modern slavery were identified in 2022 for our Australian operations through our global [Integrity Line](#).

## REMEDATION

If our business activities are suspected of causing or contributing to human rights compliance issues, we will investigate, address and respond to the concerns raised, and take appropriate corrective action in response to any substantiated allegations. All concerns will be promptly, impartially and confidentially investigated and acted upon. We place importance on the provision of an effective remedy wherever human rights impacts occur.

Our response to any instance of modern slavery or related exploitation will depend on the severity of the harm or potential harm, and our level of involvement in the harm (caused, contributed to or directly linked). Our response will be guided by the [Walk Free Response and Remedy Framework](#).

We are committed to continuing to increase the capacity of our management to effectively identify and respond to these concerns. Furthermore, we continue to build the awareness and knowledge of our employees on human rights, encouraging them to speak up, without retribution, about any concerns they may have. Alcoa's Anti-Retaliation Policy expressly prohibits retaliation against anyone who reports any issue in good faith.

# Our training

**Alcoa acknowledges the importance of training to drive awareness of human rights and modern slavery within our specific context and more broadly.**

Every year, we require every employee to complete [Code of Conduct](#) training. The training covers key policies and procedures, and topics of importance including conducting business with integrity, prohibiting retaliation, treating others with respect, and respecting and valuing human rights. This is a basic level of training we aim to build on. Due to COVID-19 impacts, our ability to deliver training to our operational employees was limited in the past, however face-to-face training has subsequently been reinstated and continues.

In 2021 our Human Rights Council developed a three-year implementation plan to deploy the Human Rights Management Standard, including a workstream dedicated to improving awareness of human rights issues and building our capacity to manage these risks appropriately. Human rights training for leaders has been developed and will be progressively rolled out in 2023.

Within the procurement function we have developed an internal Procurement University training program. Modules include our Responsible Sourcing Approach and Human Rights Awareness.

In 2023 we plan to revise our human rights training suite to improve awareness of our human rights approach and commitment to operate in a manner consistent with the UN Guiding Principles and expand the audience to our executive and leadership teams, external affairs and commercial team.



# Assessing the effectiveness of our actions

## We assess our effectiveness in identifying and managing modern slavery and human rights risks in a number of ways:

- tracking our actions and outcomes
- engaging with suppliers
- utilising regular internal governance and external assurance processes
- reviewing external assessments of our modern slavery disclosures

Our Human Rights Council (see page 19) provides us with the opportunity to take a company-wide approach to monitoring the effectiveness of our programs. We plan to further enhance our approach to monitoring effectiveness through the Human Rights Council and Australian Working Group in 2023.

We recognise the challenge in assessing the effectiveness of our programs due to the complexity of modern slavery and the fact that many of the risks exist deep in supply chains where our visibility and ability to influence suppliers may be limited. We are committed to strengthening relationships with suppliers to improve our understanding of risks within their operations and supply chains.

In 2022, several external benchmarks were released that provided a review on Modern Slavery Statements prepared under Australian legislation. The Australian Working Group reviewed these benchmarks and sought to improve on the quality of our Modern Slavery Statement, including the level of transparency of the risks and our overall program, and we have sought to improve the level of detail disclosed in this Modern Slavery Statement. We also collaborate regularly through our various memberships and partnerships to incorporate feedback from these stakeholders into our program.



## INDEPENDENT CERTIFICATION

We utilise certification schemes to independently assess the effectiveness of our actions. The Aluminium Stewardship Initiative (ASI) is a global non-profit standard-setting and certification organisation and is the only comprehensive voluntary sustainability standard initiative for the aluminium value chain. The standards include indicators relating to human rights, including modern slavery. Alcoa's Western Australian operations have been certified by ASI since January 2020, while Portland achieved ASI certification for the first time in April, 2023.

In 2022 the LME introduced Responsible Sourcing disclosure requirements. For our Australian operations, this applies to the Portland Aluminium smelter, and the Western Australian operations as the smelter's source of alumina (and bauxite). The evidence requirements subject to audit by the LME include a supply chain due diligence policy in line with the OECD's 5 Steps guidance for addressing human rights in business supply chains, the identification of origin for strategic raw materials including mapping and disclosure against CAHRAs, and demonstrated compliance with policy and processes. Brands deemed not to comply with the minimum requirements are no longer permitted to trade on the LME. All of Alcoa's LME-listed brands met the responsible sourcing requirements for 2022.

Other voluntary initiatives, including the International Council on Mining and Metal (ICMM) Performance Expectations, help us and others to assess our performance on human rights. Internal and external assessments against these voluntary standards allow us to assess our practices and identify opportunities for improvement, both at the Australian and global level.





## SUPPLIER SUSTAINABILITY PROGRAM

In 2022 we continued to progress performance and transparency in our supply chain. Through the Supplier Sustainability Program and Responsible Sourcing Framework, 100 per cent of our suppliers were assessed, with 19 identified as higher risk. Of our 2061 suppliers, 168 completed the Ecovadis Ratings Audit, covering 51 per cent of our procurement spend.

Supplier maturity continued to improve with 61 per cent of suppliers improving their audit rating on reassessment. All our suppliers continue to perform above EcoVadis industry benchmarks in both the Labour and Human Rights specific performance and overall. Notable improvements include the number of suppliers that have developed their own responsible sourcing programs and grievance mechanisms.

The implementation of EcoVadis Academy's on-demand training has seen nine suppliers complete the Labour and Human Rights module.

The inclusion of human rights controversy monitoring has seen 20 incidents identified over 2022. All these incidents were given a minor materiality assessment by EcoVadis, with 16 incidents being safety related, two involving strikes around pay (classified as working conditions) and two regarding social controversies relating to transparency and the historic performance of a supplier's subsidiary. With the introduction of this reporting, we will continue to monitor supplier performance in 2023.

## FIELD AUDITS

Our standard procurement contract provides us with the right to audit suppliers for contractual compliance. These in-field audits are a way to provide assurance that our suppliers are implementing their policies and procedures, and meeting our expectations. Historically, our field verification audits have not focussed on human rights but have included invoices and hours worked.

In 2022 we advanced our approach by developing a protocol for onsite supplier audits. With the support of a third party, we have developed our Supplier Site Collaboration program. The program builds on our risk assessment approach and integrates into our Supplier ESG Risk Decision Tree. In 2023 we will be implementing the Supplier Site Collaboration program. That will include expanding our criteria for supplier participation in the Audit pillar of our Supplier Sustainability Program and using that performance to identify suppliers for the Supplier Site Collaboration program. The continued monitoring of human rights controversies will also inform supplier selection for the Supplier Site Collaboration program.



Metrics	2021	2022
Number of suppliers assessed	2422	2061
Number of higher risk suppliers	11	19
Number of Audited (EcoVadis rated) suppliers	141	168
% of Spend Audited (EcoVadis Ratings)	43%	51%
Average Audit score (EcoVadis ratings)	50.8	53
% of suppliers with a score >25	99%	97%
% of suppliers who improved score YoY	62%	61%
Labour and Human Rights Audit Score (EcoVadis Ratings)	52.8	53.9
EcoVadis benchmark score for Labour and Human Rights	46.4	47.4
Program Advance Insights	2021	2022
% of Audited Suppliers with their own Responsible Sourcing Program	N/A	35%
% of Audited Suppliers with their own grievance mechanism/whistleblower procedure	46%	64%
Number of Audited Suppliers who have completed the EcoVadis Academy Labour and Human Rights training module	N/A	9



# Our stakeholder engagement and collaboration

During 2022 we continued to engage with a variety of stakeholders on our approach to modern slavery risk management including government, industry experts, our suppliers and industry associations. We recognise the importance of collective and considered action to address shared modern slavery risks. We regularly participate in initiatives that encourage and enable organisations to share information, lessons learned and best practices.

## KEY ENGAGEMENT WITH STAKEHOLDERS

### Multi-stakeholder forums

In 2022 we engaged with the following key forums on a range of human rights topics, including modern slavery issues:

- International Council on Mining and Metals (ICMM) including the Human Rights Working Group
- UN Global Compact
- Human Rights Resources and Energy Collaborative including the Shipping, Supply Chain and Remedy workstreams.
- Aluminium Stewardship Initiative (ASI) including the Human Rights Working Group

### Worker representatives

Recognising the links between respect for broader labour rights and preventing modern slavery, we continue to engage with workers' organisations at a local and regional level. This includes working with our main union stakeholders such as Australian Workers Union and Australian Metal Workers Union.

### Investors

We continue working with investors, including responding to investor inquiries about how we assess and address modern slavery risks.



## Consultation

**Alcoa has centralised management and processes in respect of its policies, standards, procedures and tools through which human rights and modern slavery risks are assessed and managed. This is overseen by the Alcoa of Australia Board and applies to all group subsidiaries.**

This statement was prepared via input and endorsement from the Australian Working Group which is comprised of representatives from a range of functions within Alcoa, including procurement, human resources, sustainability, external affairs, legal, sales, finance, and ethics and compliance, who have the responsibility for delivering our human rights and modern slavery risk management processes across our operations and supply chains (including those of our controlled entities).

As well as being reviewed by the Human Rights Council and approved by the Board, this Modern Slavery Statement was provided to the directors of our reporting entities, as well as our Vice President of Operations, Director of Responsible Sourcing, Vice President of Procurement and Transportation, Australian Procurement Director, Vice President Sustainability, Human Resources Director Australia and Director of Pacific Bauxite and Alumina Sales and Trading for their review and input.



## Future actions

**Alcoa is committed to the continuous development of our modern slavery risk management activities. We acknowledge it takes consistent action to identify and address modern slavery risks.**

Our future aims are to:

- Continue to identify opportunities to strengthen relationships and collaborative efforts to identify and address modern slavery risks
- Implement action plans, including recommendations from the HRIAs completed in 2022
- Expand the criteria for suppliers requested to complete the EcoVadis Ratings Audit
- Implement our Supplier Site Collaboration program (onsite Supplier Audits)
- Enhance and expand our human rights training including face to face training with operational employees
- Continue embedding due diligence, process improvements and our risk management system, and mature our understanding of the risk of modern slavery in our supply chain
- Strengthen our collaboration with suppliers
- Contribute to the upcoming review of the Australian Modern Slavery Act
- Continue discussions and engagements with a variety of stakeholder regarding modern slavery, including root causes and mitigation measures
- Continue to meet the LME's Responsible Sourcing Standard.

### **RESPONSIBLE SOURCING KPI'S**

- 100% of suppliers assessed by EcoVadis
- All higher risk suppliers to complete EcoVadis Ratings Audit
- All suppliers with an EcoVadis Ratings Audit score <24 to complete corrective action plan
- >60% of suppliers improve EcoVadis Ratings Audit score on reassessment

# Appendix A

## REPORTING ENTITIES

Reporting entity	ACN	Registered Address	Principle activities/overview of operation	Effective interest %
<b>Alcoa of Australia Limited</b>	000 364 992	181-205 Davy Street, Booragoon WA 6154	As described within this statement.	Alcoa of Australia is owned by Alcoa World Alumina and Chemicals (AWAC), an unincorporated global joint venture between Alcoa Corporation and Alumina Limited. Alcoa Corporation owns 60%, and Alumina Limited owns 40%, of AWAC.
<b>Alcoa Australia Holdings Pty Ltd</b>	096 987 370	181-205 Davy Street, Booragoon WA 6154	This entity holds the 60% shareholding in Alcoa of Australia Limited pursuant to AWAC. It is subject to Alcoa Corporation's policies, standards and governance structures as described in this statement.	60% shareholding in Alcoa of Australia Limited. Ultimate holding company is Alcoa Corporation.
<b>A.F.P. Pty Ltd</b>	004 513 599	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions of the group and its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.	Wholly owned by Alcoa of Australia Limited
<b>Alcoa Portland Aluminium Pty Ltd</b>	006 306 752	181-205 Davy Street, Booragoon WA 6154	Alcoa Portland Aluminium Pty Ltd is a 100% owned subsidiary of Alcoa of Australia Limited that acts as the manager for the Portland Smelter and enters into procurement and other contracts as the agent for the joint venture participants in accordance with the terms of the Portland Aluminum Participants Agreement. Alcoa Portland Aluminium is subject to Alcoa Corporation's policies, standards and governance structures as described within this statement. The Board of Directors of Alcoa Portland Aluminium Pty Ltd wholly consists of directors who are also directors of Alcoa of Australia Limited.	Wholly owned by Alcoa of Australia Limited
<b>Eastern Aluminium Pty Ltd</b>	062 841 007	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions of the group and its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.	89.27% owned by Alcoa of Australia Limited and 10.73% owned by A.F.P. Pty Ltd

Reporting entity	ACN	Registered Address	Principle activities/overview of operation	Effective interest %
Hedges Gold Pty Ltd	005 592 067	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions of the group and its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.	Wholly owned by A.F.P. Pty Ltd
ACAP Australia Pty Ltd	058 452 556	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions of the group and its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.	Wholly owned by A.F.P. Pty Ltd
Eastern Aluminium (Portland) Pty Ltd	067 391 824	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions of the group and its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.	Wholly owned by Eastern Aluminum Pty Ltd
Alcoa Energy Holdings Australia Pty Ltd	110 752 808	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions of the group and its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.	Wholly owned by Alcoa of Australia Limited
Alcoa Share Plan Administration Pty Ltd	065 591 657	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions of the group and its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.	Wholly owned by Alcoa of Australia Limited



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