



Alcoa

2023 Modern Slavery Statement

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Acronyms

ASI

Aluminum Stewardship Initiative

CoE

Center of Excellence

CAHRAs

Conflict-Affected and High-Risk Areas

CSR

Corporate Social Responsibility

ICMM

Council on Mining and Metal

DIHR

Danish Institute for Human Rights

DJSI

Dow Jones Sustainability Index

E&C

Ethics and Compliance

GPLT

Global Procurement Lead Team

HRDD

Human Rights Due Diligence

HRIAs

Human Rights Impact Assessments

HRREC

Human Rights Resources and Energy Collaborative

LME

London Metals Exchange

OHS

Occupation Health and Safety

OSHA

Occupational Safety and Health Administration

SCO

Strategic Commercial Owner

SSC

Supplier Site Collaboration

SSP

Supplier Sustainability Program

UNGPs

United Nations Guiding Principles on Business and Human Rights



Alcoa's modern slavery statement

Our commitment

Our values (act with integrity, operate with excellence, care for people, lead with courage) form the foundation for our [Human Rights Policy](#) and Standard, and for this Global Modern Slavery Statement. This Statement highlights the actions we have taken to identify and address modern slavery risks throughout our operations and supply chains in 2023.

About Alcoa

Our operations: structure and activities

Alcoa is a global industry leader in the aluminum value chain, built on a foundation of strong principles and operating excellence dating back more than 135 years. Alcoa has ownership in five active bauxite mines, seven refineries, 14 smelters, and six energy assets, employing approximately 13,000 workers worldwide.








Our policies, standards, and supplier programs apply across Alcoa's global operations. More information on our organizational structure and corporate governance can be found in our annual Sustainability Report. This modern slavery report is global, including operational regions where modern slavery reporting is mandatory (Australia, Canada, Norway).

Higher risk supplier locations



Our global footprint includes assets in Australia, Canada, and Norway, where modern slavery reporting is regulated. These assets and operation types are listed below.



Australia

-  **Bunbury**
Port Terminal
-  **Huntly**
Mine
-  **Kwinana**
Refinery and Port Terminal
-  **Point Henry**
Rehabilitation site
-  **Pinjarra**
Refinery
-  **Portland**
Smelter
-  **Wagerup**
Refinery
-  **Willowdale**
Refinery

Canada

-  **Baie Comeau**
Smelter
-  **Bécancour**
Smelter
-  **Deschambault**
Smelter

Norway

-  **Lista**
Smelter
-  **Mosjoen**
Smelter

Alcoa has additional employees and contractors in office settings and/or joint ventures outside of the previously listed sites. Alcoa also has two employees in the United Kingdom and 43 employees in the Netherlands, both countries with modern slavery reporting requirements. These sites have neither the revenue nor personnel to make those countries' reporting requirements applicable to our business. However, related supplier risks are documented in this report as a matter of comprehensiveness and transparency.

In some instances, Norway's supplier data is merged with supplier data for the European region because a large portion of critical materials and services provided to Norwegian operations are sourced through the European office. Our active European operations include the two Norwegian assets, a smelter in Iceland, and a refinery in Spain.

Our supply chains

Alcoa's policies and procedures also apply to our suppliers. More than 10,000 suppliers serve our global operations. These entities provide goods and services, including chemical inputs, alloying metals, hydrocarbons, energy sources, transportation, and labor contractors for an array of functions. Our supply chains span 243 industries in 83 countries.

Alcoa's supply chain is managed by our procurement and commercial teams, reporting to our Chief Commercial Officer. Our approach to responsible sourcing and supplier sustainability across the value chain is managed by our Director of Responsible Sourcing aligned with our [Responsible Sourcing Framework](#). Our procurement practices support our entire product lifecycle, from exploration to delivery.

These practices are governed by our [Supplier Sustainability Program](#) (SSP), as elaborated on page 17, which applies to all suppliers, contractors, and other entities with which we do business. This includes the assessment and audit of Tier 1 suppliers and, to a limited extent, Tier 2 suppliers.

Our approach

The aim of a modern slavery statement is threefold: first, to state a company's intention to eliminate modern slavery from its value chain; second, to outline processes for identifying and addressing forced labor in its operations and relationships; and third, where such risks and harms are identified, to seek remedies for survivors and prevention measures to avoid recurrences.

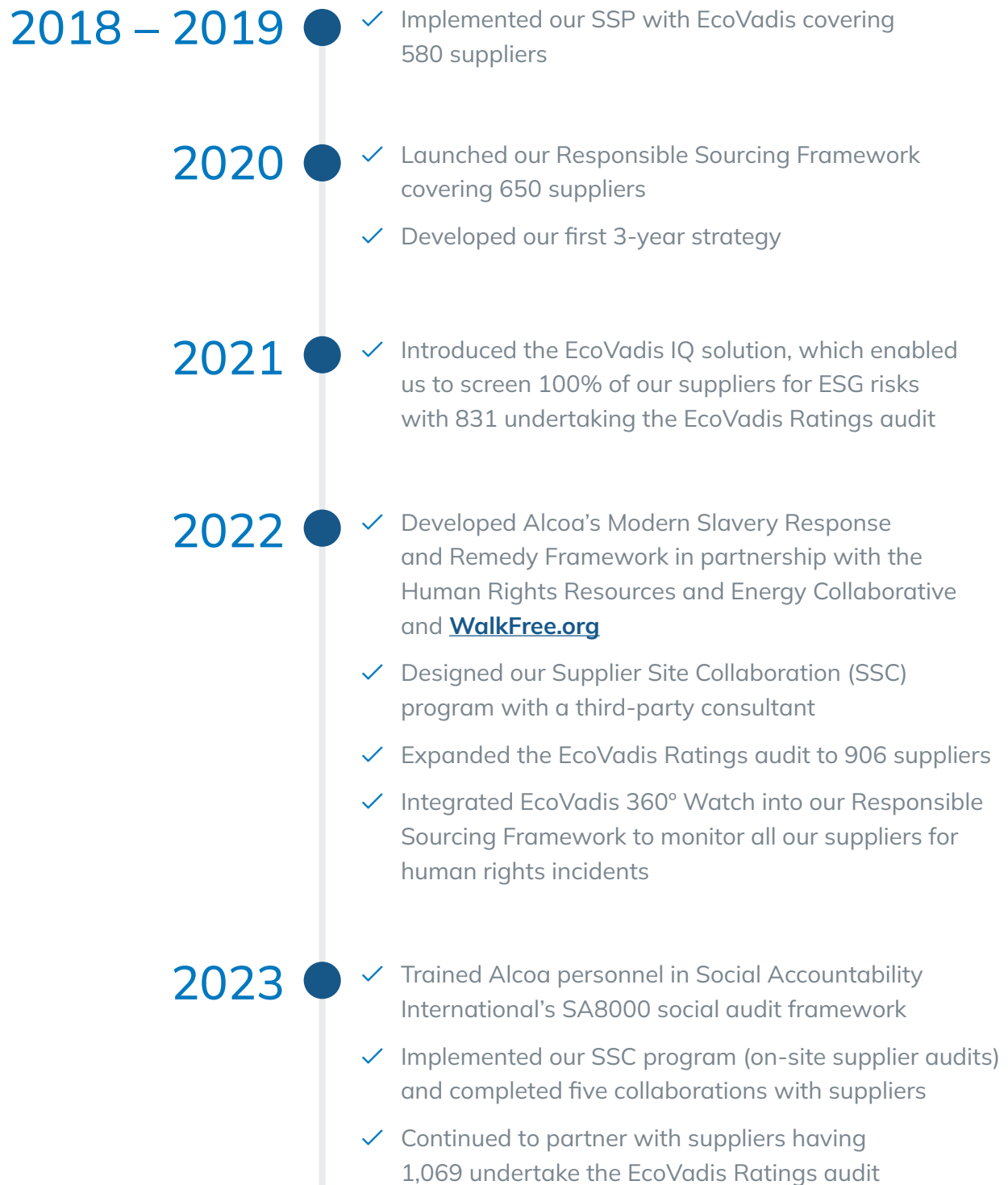
Modern slavery reporting team: consultation and collaboration

Assessing and reporting modern slavery risks is a multi-departmental task spanning operations, external affairs, and procurement functions. Alcoa established a Human Rights Center of Excellence (CoE) in 2023. The Human Rights Director

serves as its lead, with the support of our globally dispersed [Human Rights Council](#), as described on page 9. Alcoa also consults externally in collaboration with other parties working to combat modern slavery, particularly on approaches to remedy.



Alcoa's supply chain human rights journey

- 
- 2018 – 2019** ✓ Implemented our SSP with EcoVadis covering 580 suppliers
- 2020** ✓ Launched our Responsible Sourcing Framework covering 650 suppliers
- ✓ Developed our first 3-year strategy
- 2021** ✓ Introduced the EcoVadis IQ solution, which enabled us to screen 100% of our suppliers for ESG risks with 831 undertaking the EcoVadis Ratings audit
- 2022** ✓ Developed Alcoa's Modern Slavery Response and Remedy Framework in partnership with the Human Rights Resources and Energy Collaborative and [WalkFree.org](https://www.walkfree.org/)
- ✓ Designed our Supplier Site Collaboration (SSC) program with a third-party consultant
- ✓ Expanded the EcoVadis Ratings audit to 906 suppliers
- ✓ Integrated EcoVadis 360° Watch into our Responsible Sourcing Framework to monitor all our suppliers for human rights incidents
- 2023** ✓ Trained Alcoa personnel in Social Accountability International's SA8000 social audit framework
- ✓ Implemented our SSC program (on-site supplier audits) and completed five collaborations with suppliers
- ✓ Continued to partner with suppliers having 1,069 undertake the EcoVadis Ratings audit

Policy, due diligence, and governance

Alcoa is committed to respecting human rights. This is fundamentally important to our rightsholders and stakeholders, and it is grounded by our values. In addition to its applicability to our employees, suppliers, contractors, and business partners, our [Human Rights Policy](#) recognizes the rights of individuals in the communities where we operate. Our policy prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor, child labor, and any form of human trafficking.

Our human rights policy and standard require that we conduct due diligence to identify, monitor and remediate impacts on rightsholders affected by our operations and supply chains. Due diligence processes undergo iterative strengthening and revision in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs). Our screening protocols for identifying high-risk operations, contexts, and commodities are strengthened by internal learnings and complemented by guidance from external supply chain management services. Alcoa is proactively working to expand systems, procedures and protocols going forward, refining ways of identifying modern slavery risks and managing them in a rightsholder-centric manner through grievance mechanisms and advances in remedy and response implementation.

Corporate governance: Human Rights Council

Our Human Rights Policy, [Code of Conduct and Ethics](#), and Supplier Standards form the foundation of our approach to managing modern slavery risks, overseen by our Human Rights Council. The Human Rights Council defines and implements management systems that enable us to respect individual and collective human rights across our operations and supply chains. It includes representatives from each region and function, and it is co-chaired by the Vice President of Sustainability and the Director of the Human Rights CoE.

This Modern Slavery Statement was developed in coordination across Alcoa's responsible sourcing, human rights, and ethics and compliance programs, with additional support from our sustainability and legal teams.

Key policies and governance procedures

Policies	Procedures
Human Rights Policy	Our Human Rights Policy prohibits the use of all forms of forced labor and 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. It 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 into management practices and mechanisms. It requires all business operations to identify, prevent, mitigate, and report any actual or potential human rights impacts as a result of their activities. The standard also outlines the requirements for effective remediation should we cause or contribute to an actual human rights impact. It 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. It is available on our website and intranet.
Integrity Line	The Integrity Line is an independently run reporting and grievance line available to workers and communities across all our global operations. Directions for accessing and using the Integrity Line are available in all our operating languages, on our website and intranet.
Responsible Sourcing Framework and Supplier Sustainability Program	Our Responsible Sourcing Framework and Supplier Sustainability Program form an intelligence and risk-based basis for decision-making, integrated into how we identify, select, contract, and manage the goods and services that we procure. More information on these programs is available on the Supplier page of our website.
Risk Management Framework	Blending Enterprise Risk Management and Operational Risk Management, we identify and evaluate a broad spectrum of risks across all aspects of our business, including modern slavery risks. Information on our Risk Management Framework is included in our Sustainability Report.
Anti-Corruption Policy	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.

Supply chain due diligence

We screen, audit, and monitor our suppliers throughout our supply chain, identifying country-specific and industry-wide risks, as well as supplier-specific ESG performance. Our primary program partner, EcoVadis, provides individual company profiles, ongoing monitoring, and broader analysis. With this data, we prioritize heightened due diligence for those suppliers that pose the greatest ESG risks, including human rights concerns.

Heightened due diligence may include process, procedure, and performance audits, and/or site-level in-person field audits. Our specific process for risk scoping, risk assessment, and risks scoring in our supply chains is described under “[Managing and preventing modern slavery risks](#).”

Operational due diligence

Alcoa conducts human rights due diligence through both internal and third-party reviews of operations and practices. At our site locations, we screen operations for human rights risks to identify areas that merit a review by an independent third party. We also have an internal human rights checklist. A review of this checklist began in 2023 and is expected to be completed in 2024.

Alcoa’s operations are closely monitored facilities, and our onboarding process is rigorous in the verification of all workers’ ages, working hours, and entitlements to benefits. Labor protections are established through collective bargaining agreements that align with local laws. At non-unionized facilities, working conditions are benchmarked against unionized workforces in the industry and region, and wages are calculated based on living wage rates established by third parties.

Our due diligence practices and outcomes are subject to continuous evaluation. Our specific process is outlined under “[Managing and preventing modern slavery risks](#).”

Cause, contribution and linkage to forced labor risks

Our modern slavery risk profile is based on the sociopolitical contexts where we operate and source from, as well as the nature of the goods and services we procure. We evaluate modern slavery risks in our operations and supply chain, using the UNGP concepts of causation, contribution and direct linkage. These concepts are defined as follows:

- A company may *cause* the impact by directly establishing the conditions of risk through weak policies, procedures or oversight in workforce hiring.
- A company may *contribute* to the impact by indirectly establishing the conditions of risk. For example, by setting budgets for contracts that are insufficient to cover the cost of adequate working conditions or to hire an adequately skilled adult workforce.
- A company may be *directly linked* to modern slavery through a third-party contractor or investment. For example, if the third party engages forced labor despite safeguards in place, or through partnership with a state-owned entity incapable of issuing secure and verifiable identity documents to conduct systematic age and/or work eligibility verification.

Understanding the role we might play in relation to actual or potential risks informs our approach to mitigation and remediation.

Executive oversight

Alcoa's Board of Directors is ultimately responsible for verifying that appropriate procedures are in place to identify, assess, manage, remediate, and report any modern slavery risks in accordance with relevant modern slavery acts and human rights due diligence (HRDD) regulations in the areas where we operate. These procedures are also aligned with relevant laws in customer jurisdictions, including the UK, Switzerland, the Netherlands, and Germany.

Our Executive Team is responsible for managing modern slavery risks within our business. Our Vice President of Global Procurement and Transportation is responsible for assessing and managing modern slavery risks within our supply chain. Additionally, our Human Rights CoE, in coordination with the Human Rights Council, is responsible for implementing and monitoring our human rights program globally.

Alcoa's Modern Slavery Statement statement receives sign-off annually from the Alcoa of Australia Limited¹ Board of Directors, as mandated under Australian law. It is also reviewed by governance bodies at Canadian entities controlled by Alcoa.

¹ Alcoa of Australia Limited is a wholly-owned subsidiary of Alcoa Corporation based in Australia.

Identified modern slavery risks

Child labor, forced labor, and bonded labor

Alcoa uses a tailored approach to identify the specific types of modern slavery considered in human rights instruments. Child labor risks are controlled in our operations by our onboarding process, which rigorously verifies worker ages. Alcoa's apprenticeships, in countries where such programs exist, are restricted to students aged 18 and older for floor-level work. Apprentices are compensated in accordance with minimum wage requirements. See "[Managing and preventing modern slavery risks](#)" for details.

Alcoa respects the right to unionize for all direct employees and contracted workers, worldwide. Full-time employees have wage and hour guarantees through collective bargaining agreements. Temporary and contractor workers are protected by localized laws and, in some contexts, collective bargaining agreements. These workers pose our most significant risks of forced labor on site. These risks are managed through several interventions: (1) an active effort to integrate temporary workers into the permanent workforce; (2) audits of high-risk contractors globally (see "[Field audits](#)" for more details); and (3) regular screening through various supply chain management tools.

Additional oversight is provided in Canada, where all contractors and their laborers are registered in Cognibox, a supplier management service. In addition to verifying and safeguarding identity documents, the software provides skills and training monitoring, and other relevant information to maintain workers' safety and protections on site.

Bonded labor is not a risk in Alcoa's direct operations. There are no recruitment fees, behavior-based fines, or other worker debts incurred to the Company.

Supplier labor rights risks are evaluated through the multi-stage assessment process of our SSP. Alcoa evaluates human rights risk, including modern slavery risk, in our supply chain by combining geographical risks and risks inherent to key commodities and services. As a result, we have identified ocean transportation and process chemicals as areas of higher risk at a global scale. Heightened risks specific to each of our operating regions is outlined in the following table.

Key inputs and source countries

Country	Number of suppliers ²	Top supplier categories by spend	Top supplier categories by context / industrial risk ³
Global	10,044	Energy	Ocean transportation
		Facility maintenance	Facilities management
		Alloying metals	Caustic soda
		Alumina	Alumina and bauxite
		Maritime transportation	Silicon
Australia	2,140	Energy	Process chemicals
		Caustic soda	Caustic soda
		Facility maintenance	Refractories
		Mobile equipment	
		Transportation	
Canada	1,202	Energy	Anodes
		Anodes	Cathodes
		Facility maintenance	Calcined coke
		Calcined coke	Alloying metals
		Mobile equipment	
Brazil	2,974	Facility maintenance	Alumina
		Fuel	Alloying metals
		Caustic soda	Facility maintenance
		Alloying metals	Industrial mill supplies
		Mining support services	
Norway and Europe	1,813	Energy	Alloying metals
		Alloying metals	Calcined coke
		Facility maintenance	Cathodes
		Calcined coke	Industrial mill supplies
		Coal Tar pitch	
USA	1,593	Alumina	Cathodes
		Energy	Fabricated metals
		Alloying metals	Electrolytes
		Maritime transportation	Maritime transportation
		Facility maintenance	Alumina

² Operations conduct sourcing locally for additional goods and services with smaller contracts. Those listed here are linked to global and regional procurement processes. Regional numbers are a subset of the global numbers recorded in row 1 of this table. In some instances, a supplier might be counted more than once if they are servicing more than one region.

³ Risk categorization produced by EcoVadis. Country risk is factored into the overall risk rating, along with industry risk and other factors. In most cases high country risk triggers an overall high risk rating which triggers our stage 2 due diligence, EcoVadis Ratings audit.

Managing and preventing modern slavery risks

In our operations

Employment practices

Since 2021, Alcoa Corporation has conducted living wage studies of all direct employees across our operations. The results in 2023 demonstrated that 99.5% of our workers are paid a living wage.⁴

All employees are required to undergo onboarding training, which covers our policies and standards. Under our Human Rights Management Standard, each location (with the support of the Human Rights Director and Human Rights Council) works to identify, prevent, mitigate and report any actual or potential human rights impacts as a result of their business activities. This includes hiring, contracting, and retrenchment practices. Further, Alcoa's procurement team has been receiving training on Responsible Sourcing, including a module on modern slavery, since 2021.

Risk scoping and assessing

Field-based human rights assessment is carried out on a schedule aligned to our Aluminum Stewardship Initiative (ASI) audit recertification calendar, thus assuring that every site is evaluated in detail for forced labor every three years at a minimum. We conduct human rights impact assessments (HRIAs) using methodologies aligned with the guidelines outlined by the Danish Institute for Human Rights (DIHR), as well as other guidance established through the independent certifications described in the following section.

Founded in 2016, the ASI is a multi-stakeholder initiative bringing together producers, users and stakeholders to collaboratively foster responsible production, sourcing and stewardship of aluminum. ASI also offers the only comprehensive voluntary sustainability standard initiative for the aluminum value chain. The standards include specific indicators regarding modern slavery. Alcoa is a founding member of ASI and has certified global operations against ASI's performance standards and chain of custody standards

⁴ Workers whose salary was below a living wage benchmark were re-evaluated at site level. This applied to 15 workers at our Poços de Caldas location. 14 were under new hire probation and one was a part-time worker. Within six months of review, all workers had achieved living wage status, which was nearly double the minimum wage for the region.

Assessments begin with a document review, including records related to health and safety risks, payroll data, site-level supplier protocols, and contextual security data. Additional documents are gathered during fieldwork, which includes direct observation as well as interviews and group discussions with employees, contractors, managers, community members, and potentially vulnerable sub-populations (i.e., immigrants, women, ethnic minorities, etc.).

We rank human rights concerns based on the extent and intensity of a potential impact. We also rank risks using a severity/likelihood matrix. Identified risks are reported to managers responsible for operations, responsible procurement, and sustainability.

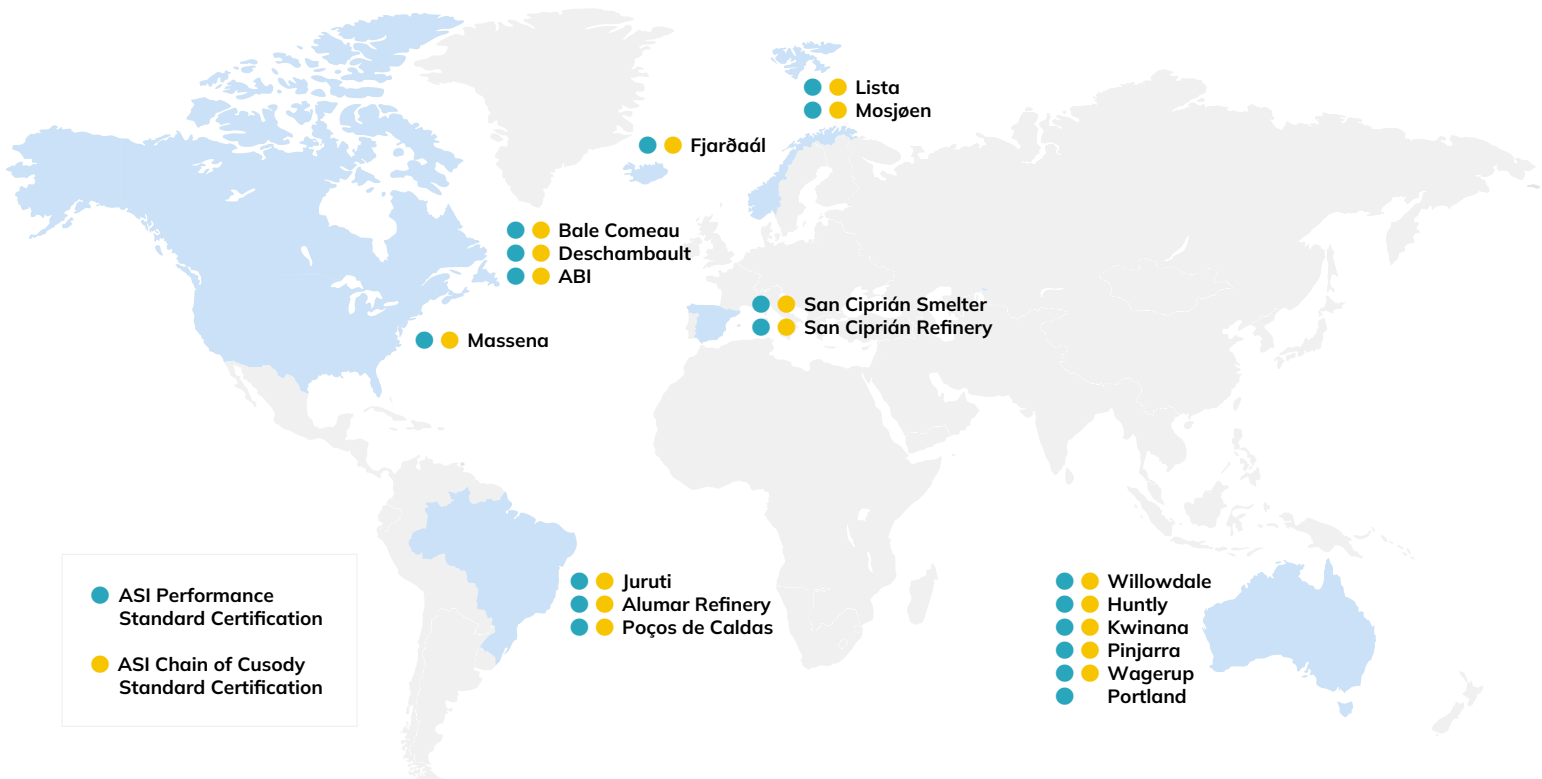
Independent certification

Our commitment to prevent modern slavery is reinforced through the various certification schemes and multi-stakeholder initiatives we have joined. As members of ASI, we have certified 18 of our global operations under the ASI Performance Standard, 17 of which have also received Chain of Custody certification. We also have certification for our global enterprise at the corporate level.

Our participation in International Council on Mining and Metal (ICMM), London Metals Exchange (LME) Responsible Sourcing, Dow Jones Sustainability Index (DJSI), and the EcoVadis Corporate Social Responsibility (CSR) Assessment also contributes to our broader effort to operate sustainably and prevent human rights risks in our operations and supply chain.

Alcoa operations with ASI certifications

Last updated in November 2023. Portland to be added to the Chain of Custody Certification in Q2 2024.



In our supply chains

Decision-making for our inbound supply chain activities is driven by our global procurement policies and procedures. Our supplier selection process considers environment, health and safety, sustainability, anti-corruption, quality, financial capacity, technical expertise, and continuous improvement parameters.

In 2023, Alcoa established a new Contractor Management Standard. This standard covers contractor work management, safety, productivity, and governance. It will be rolled out in 2024.

Supplier Standards

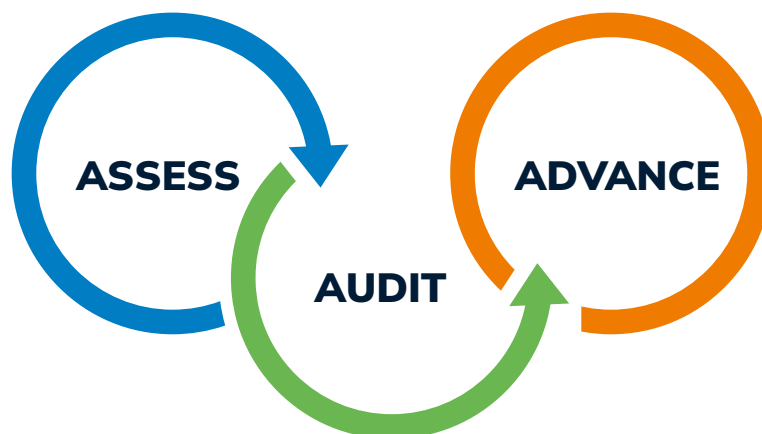
In conjunction with our Code of Conduct and Ethics and Human Rights Policy, our Supplier Standards outline our expectations for the businesses and suppliers that work with us. These standards are publicly available on our website and form part of our tender documentation and contracts. They set expectations around minimum wages, freedom of association, child labor and forced labor, and grievance mechanisms (including access to our independent, third-party ethics line, the Integrity Line) that are applicable to all supplier entities.

Supplier Sustainability Program

Alcoa's Supplier Standards are reinforced and supported through our SSP. The SSP consists of three components – assess (screen), audit, and advance. First, our supplier base is screened by leading third-party data CSR ratings providers, including EcoVadis. Select suppliers then undertake the EcoVadis Ratings Audit, while others undergo field audits to assess the severity and likelihood of specific identified risks. Lastly, we track supplier performance by evaluating efforts to advance ESG goals and protect human rights.

The SSP meets requirements of the LME's Responsible Sourcing Policy.

Three components of the Supplier Sustainability Program



Assessing and risk screening

We use the EcoVadis IQ platform to screen all current and potential suppliers for ESG risks, including labor rights risks. Suppliers and other signatories are also screened for sanctions under US laws through Descartes MK Denied Party Screening. No denied parties are permitted to participate in our supply chain. Moreover, intermediaries, traders, and scrap aluminum suppliers are required to be registered on TRAC, an online supplier compliance platform.

In 2023, EcoVadis IQ introduced a specific modern slavery risk assessment based upon the Global Slavery Index published by [WalkFree.org](https://www.walkfree.org/). This new risk factor has enhanced our assessment of modern slavery risks in our supply chains by allowing us to identify suppliers requiring further evaluation in the form of an audit.

Auditing

During supply chain audits, suppliers are asked to undertake the EcoVadis Ratings assessment. This self-reported assessment covers processes, procedures, risk management outcomes, and media monitoring. Suppliers who score below 25⁵ on their Ratings Assessment are required to complete a corrective action plan and undertake reassessment within 12 months. Suppliers who score 25 or above are asked to complete reassessment every two years. This reassessment aims to track improvement over time.

Advancement

During the advance phase, we work with suppliers to make targeted improvements that lower industry risks. Improvements are initiated through corrective action plans, entailing the development of specific processes and procedures, the establishment of key performance indicators, and/or the completion of on-demand e-learning available through the EcoVadis Academy.

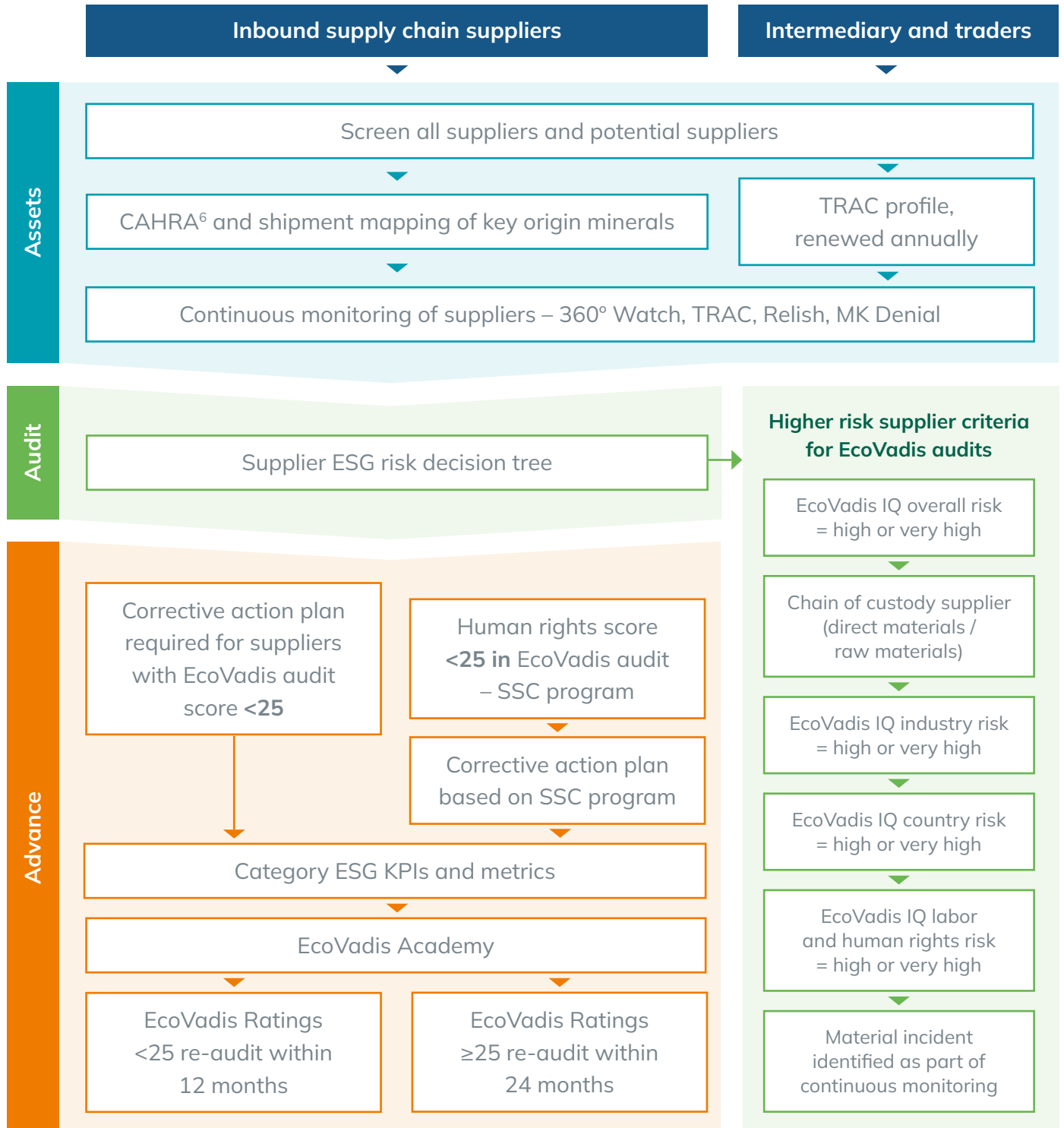
In 2023, Alcoa launched its SSC program, an on-site, in-person audit process conducted by Alcoa personnel. The SSC protocol leverages the insights and coaching available across all ESG topics identified in EcoVadis Ratings assessments and takes guidance from leading social audit standards. Alcoa auditors undertook external social auditor training prior to rolling out the SSC program.

Suppliers can be invited to participate in the SCC program based on the following criteria:

- A.** the Supplier scored below 25 in the labor and human rights section of their EcoVadis Ratings assessment;
- B.** the Supplier is new to Alcoa and operates in a potentially higher risk industry and/or country;
- C.** the Supplier has had a significant finding identified through the 360° Watch monitoring program; or
- D.** there are other reasons of interest.

⁵ The EcoVadis scoring scale is comprised of three tiers: Good (score 45 – 64); Partial (score 25 – 44); and Insufficient (score 0 – 24).

Responsible sourcing process flow

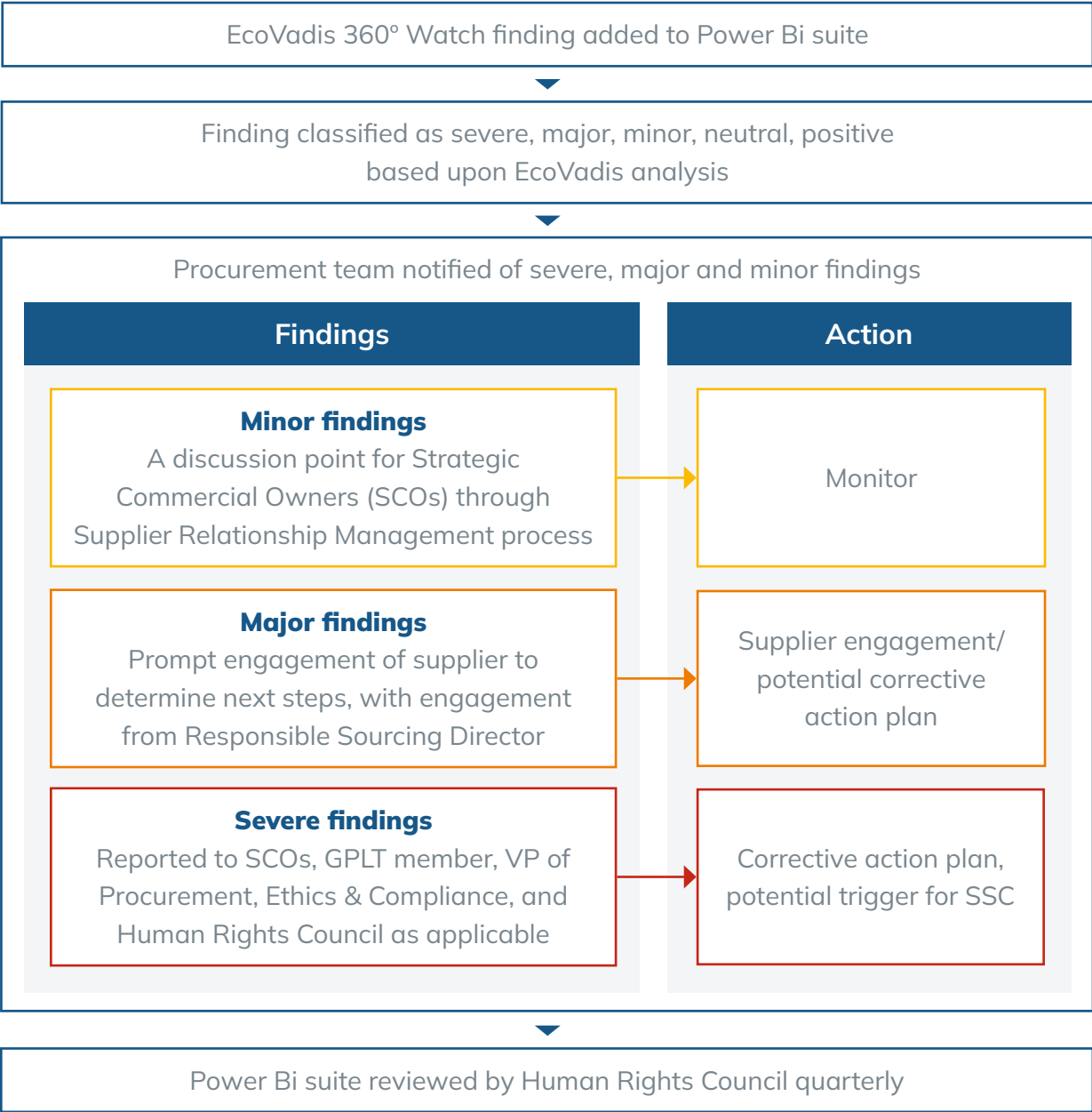


⁶ Conflict-Affected and High-Risk Areas – Areas identified by the presence of armed conflict, widespread violence, including violence generated by criminal networks, or other risks of serious and widespread harm to people.

Finally, suppliers are continuously monitored through Relish, EcoVadis' 360° Watch, and TRAC. These instruments track sanctions, red flags and headline risks. This continuous monitoring completes the assess, audit, advance, assess loop. Red flags raised through TRAC and human rights controversies identified through 360° Watch are reported to our Human Rights Council.

Human rights controversy assessment workflow

Part of the responsible sourcing process – 360° Watch findings



Severity classification of findings

Severe	Major	Minor	Under watch	Neutral
<ul style="list-style-type: none"> Company placed on severe violator enforcement program by US Occupational Safety and Health Administration Company responsible for fatalities 	<ul style="list-style-type: none"> Significant financial penalty or remedy as result of lawsuit 	<ul style="list-style-type: none"> Minor financial penalty or fine for violations Extended Strike Action 	<ul style="list-style-type: none"> Current news lacking in clarity and/or detail 	<ul style="list-style-type: none"> Filing of lawsuit Union negotiation

Source: EcoVadis

All SSP data is analyzed in our custom Power Bi suite, allowing the continuous monitoring of program KPIs, supply chain risk, performance over time, as well as industry and/or operations-based assessments to identify actionable insights.

Our suppliers continue to perform above EcoVadis industry benchmarks in both the labor and human rights module. Notable improvements include an increase in the number of suppliers that have developed their own responsible sourcing programs and grievance mechanisms.

Global and regional supplier benchmark

	Global		Australia		Europe Including Norway		North America		South America	
	2022	2023	2022	2023	2022	2023	2022	2023	2022	2023
Number of suppliers assessed	9,072	10,044	2061	2145	1859	1819	3106	3101	2676	2979
Number of higher risk suppliers	127	321	19	24	25	26	45	35	38	236
Number of suppliers audited (via EcoVadis)	1,016	907	168	158	270	240	408	349	170	160
Percentage of annual spend audited (EcoVadis Ratings)	47	51	51	50	54	42	45	52	50	59
Average audit score (EcoVadis Ratings)	50.9	50	53	51.5	55.7	54.3	50.6	50	49.7	49
Percentage of suppliers with a score >25	99	99	97	99	99	99	99	100	99	100
Percentage of suppliers who improved score YoY	69	63	61	61	72	65	70	65	67	54
Labor and human rights audit score (EcoVadis Ratings)	53.4	54.4	53.9	54.1	57.9	58.4	52.9	53.9	51.7	53.1
EcoVadis benchmark score for labor and human rights	47.4	48.8	47.4	48.8	47.7	48.8	47.4	48.8	47.7	48.8

Global and regional supplier benchmark – cont.

	Global		Australia		Europe Including Norway		North America		South America	
	2022	2023	2022	2023	2022	2023	2022	2023	2022	2023
Program advance insights										
Number of audited suppliers with their own Responsible Sourcing Program	449	381	60	58	130	116	198	145	61	62
Number of suppliers with their own grievance mechanism/ whistleblower procedure	632	510	109	91	160	125	282	223	81	71
Number of suppliers who have completed the EcoVadis Academy Labor and Human Rights training module	65	51	9	5	23	14	23	26	10	6

Source: EcoVadis

Notwithstanding, our monitoring efforts uncovered three labor rights controversies within our supply chain in 2023. These included two incidents in North America and one in South America. All these incidents were classified as ‘minor’ by EcoVadis. We have implemented additional measures to address the gaps in question.

Case study: labor rights controversy management

In 2023, the EcoVadis 360° Watch program did not identify any severe human rights controversies in our direct supply chain. However, one of our suppliers had a severe flag in an uncontracted segment of its global business. Alcoa contacted the flagged supplier to learn about the incident, including the process that led to its discovery and the proposed remedy. This was followed by an internal evaluation to determine whether or not the same or similar set of conditions could occur within Alcoa’s contracted supply chain.

A key lesson learned as a result of this engagement was that modern slavery is more likely to occur during quiet shifts (night and/or weekends), when supervision is lower. Employees and their managers need to be trained and encouraged to report potential incidents of labor abuse, and their remedy should include identifying the root cause.

Reporting incidents, grievance mechanisms, and responding to information requests

In addition to our risk assessment and due diligence, Alcoa's company-wide grievance mechanisms provide further insight into actual and potential impacts on human rights. In addition to the Integrity Line, available across all of Alcoa's operations and to all suppliers, operations-level grievance mechanisms are being established across all sites, through collaboration among the Social Performance, Ethics and Compliance (E&C), and Human Rights functions, in a designated workstream within the Human Rights Council.

Through trainings and worksite communications, we encourage employees, contractors, and suppliers to report issues or concerns through our confidential Integrity Line. Managed by a third-party, Navex Global, the Integrity Line is available to anyone, including suppliers and their employees within our supply chain. Calls are free of charge, and the service is accessible 24/7 in multiple languages. Reports can be submitted anonymously by phone or online.

The reporting process unfolds as follows:

- Navex Global provides a case number to the reporter (complainant). This number allows the reporter to check for updates by phone or via the service's website. While anonymity is optional, all reporters' confidentiality is protected throughout the investigation, except as required by law.
- All issues and concerns reported through the Integrity Line are promptly directed to our global E&C team.
- The E&C team confirms receipt of the report within 48 hours.
- The E&C team then determines the most appropriate method of investigation and whether the matter should be handled locally, regionally or at the corporate level.
- Investigations determine whether an allegation can be substantiated. Where substantiated, response and remediation are ordered.

To assess the effectiveness of our Integrity Line, we rely on Navex Global's annual Ethics and Compliance Hotline Benchmarking Report. This study contains metrics for report volume, report allegation categories, anonymous versus named reports, follow-up and substantiation rates, case closure times, and intake methods.

Expanding on the function of the Integrity Line, Alcoa is also developing approaches for responding to queries and information requests at the regional and site level. Critical issues like modern slavery will continue to be escalated to the appropriate levels.

Remediation of forced labor, unpaid wages, and other impacts

The Human Rights Standard also sets out the requirements for effective remediation should we cause or contribute to an actual human rights impact. We endeavor to identify potential adverse impacts on human rights through our SSP, third-party HRIAs, and grievances and complaints brought by stakeholders and rightsholders. After Australia established its Modern Slavery Reporting Act in 2018, Alcoa collaborated with the Human Rights Resources and Energy Collaborative (HRREC), Walk Free, and peer companies in the extractive sector to develop a Modern Slavery Response and Remedy Framework for addressing modern slavery in corporate value chains. This framework is integrated into our responsible sourcing approaches.

Training

Alcoa acknowledges the importance of training to drive awareness of human rights and modern slavery. All employees are required to undertake annual training on Alcoa's Code of Conduct, which includes references to human rights.

In 2021, our Human Rights Council developed a three-year implementation plan to deploy the Human Rights Management Standard. Recognizing that there were gaps in that standard, Alcoa determined to revise that implementation framework and timeline in 2024. The previous and current plans include a workstream dedicated to improving awareness of human rights issues and building our capacity to manage these risks appropriately.

Human rights training is being rolled out on an ongoing basis to empower our employees to identify potential human rights impacts and direct concerns to the Human Rights Council. Additionally, the procurement team has developed an internal Procurement University training program with modules addressing our responsible sourcing approach, as well as human rights awareness and chain of custody.

Field audits and supplier collaboration

Supplier field audits conducted through our SSC program (see [Advancement](#)) are a way to verify that our suppliers are implementing their policies and procedures and meeting our expectations. They also enable us to provide feedback and coaching on their ESG performance, an important part of our commitment to advancing sustainably.

To leverage the global footprint and linguistic skills of our Alcoa workforce, internal auditors were identified and trained to conduct audits in accordance with the SA8000 Social Audit Framework.

In 2023, Alcoa carried out five SSCs. No forced labor conditions were identified through any of these audits.

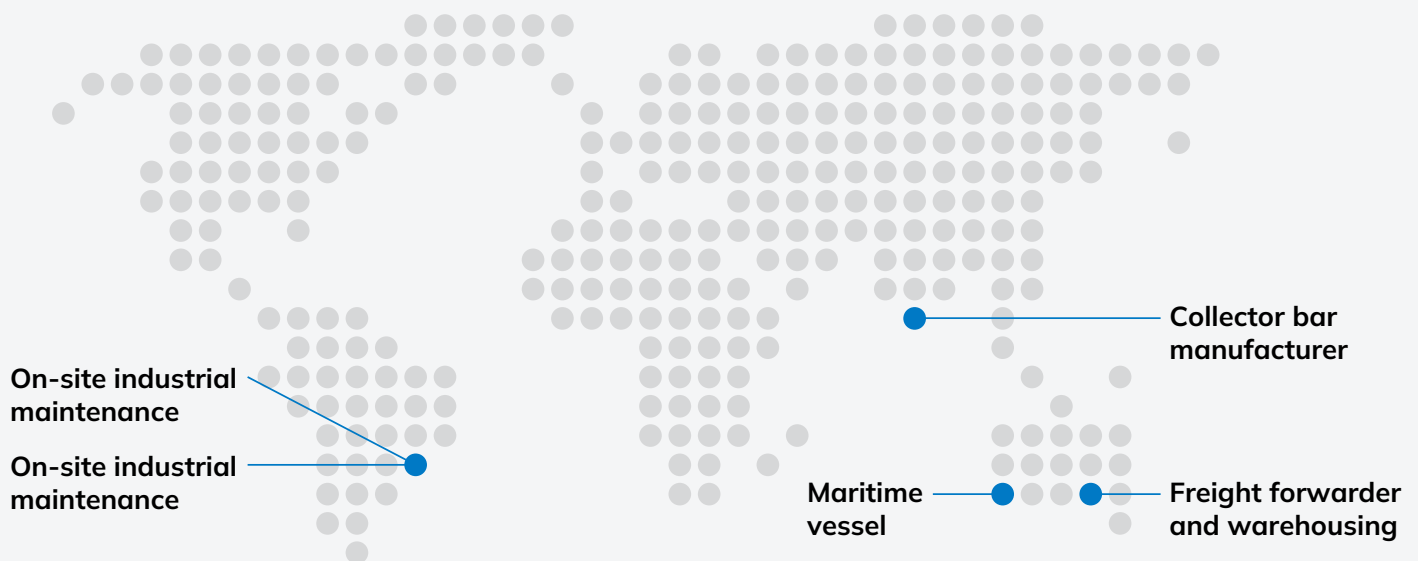
Based on feedback obtained from suppliers on the process conducted in 2023, the direct engagement and presence of Alcoa representatives during the SSC process was found to be highly valuable. Additional insights are listed on the following page.

SSC outcomes 2023

Responsible sourcing



2023 SSC supplier location and industries



SSC potential red flags

- Employees of on-site industrial maintenance suppliers were not aware of grievance procedure
- What channels are available to suppliers (grievance mechanisms)

Remedy

- ✓ Corrective action plan to establish and implement communication and awareness strategy for employee grievance mechanism
- ✓ EcoVadis Academy training – Introductory course and Labor & Social Practices Module

SSC learnings

- The use of trained in-house (Alcoa employees) resources was well received by suppliers, and resulted in better collaboration and transparency
- SA8000 training provided auditors with confidence and necessary competence to conduct effective collaborations
- Greater transparency achieved in person for higher context cultures by requiring advance disclosure and a minimum of two days for the completion of audits
- Employee and subcontractor interviews provide greatest insights, especially if translation is facilitated where needed
- The use of technology in incident reporting was found to eliminate hierarchical and language barriers
- Vessel surveyors are key to understanding vessel operations and global requirements, and present an opportunity to establish regular check-ins
- Maritime collaborations require their own checklist
- Suppliers valued feedback and guidance on how to improve EcoVadis score

Summary of recommendations

- ✓ Issue written contracts for all employees, even though not mandated
- ✓ Develop and disclose company ESG targets
- ✓ Include Modern Slavery scenarios in security risk workshops
- ✓ Greater collaboration with seafarers' associations to ensure shore leave and access to purchase discretionary provisions
- ✓ Establish and communicate grievance mechanisms including digital tools
- ✓ Improve housekeeping for Occupational Health and Safety (OHS) and perform regular drills

Grievance mechanism

No incidents of modern slavery were reported through our grievance mechanisms in 2023.

Remediation

Alcoa has not, to date, identified modern slavery in our operations or direct supply chains. In the absence of reported or identified incidents, no remediation has been undertaken.

Evaluating the effectiveness of our actions

No incidents of modern slavery were identified in any area of our operations or supply chain in 2023. As such, it was not necessary to intervene to remediate harms.

While we have endeavored to establish safeguards intended to eliminate the risk of forced labor or modern slavery, we recognize that there are complex barriers for people in conditions of forced labor and modern slavery to bring complaints. Our focus remains on identifying and addressing potential modern slavery in our supply chain, where processes are continually updated to best identify and manage risks. The effectiveness of our actions undertaken through the Responsible Sourcing Framework are measured and monitored at the executive level through the following KPIs.

Responsible sourcing KPIs

- 100% of suppliers assessed by EcoVadis
- All higher risk suppliers to complete EcoVadis Ratings audit
- All suppliers with an EcoVadis Ratings audit <25 to have a corrective action plan
- >60% of suppliers improve EcoVadis Ratings audit score on reassessment
- SSCs (field audits) conducted with five suppliers (target reviewed annually)

2023 EcoVadis performance assessment

KPI	Target	2023 performance
Suppliers assessed by EcoVadis	100%	98%
All Higher risk suppliers to complete EcoVadis Ratings audit	100%	63%
All suppliers with an EcoVadis Ratings audit <25 to have a corrective action plan	100%	100%
Suppliers improve EcoVadis Ratings audit score on reassessment	60%	63%
Alcoa SSCs completed	5	5

To assist in identifying ways to improve our program effectiveness and efforts, Alcoa undertakes the EcoVadis Ratings Assessment annually providing a measurable score as well as strength and weakness assessment and feedback. Benchmarking is undertaken through participation in the annual DJSI, and auditing through the ASI certification process.

Cross-industry collaboration

Chaired in Australia, HRREC is comprised of the major resources and energy sector companies in the world and is supported by the anti-slavery not-for-profit [Walk Free](#). During 2023, the HRREC focused on sharing knowledge about field audit approaches and the use of technology to support related efforts. Some of this knowledge sharing took place at the 2023 Modern Slavery Conference hosted by the Australian Government and attended by the collaborative.

Our future focus

Combating modern slavery is an ongoing effort. Alcoa is committed to strengthening and refining our processes to best identify, verify and prevent modern slavery risks in our operations and supply chains, and address actual and potential harms wherever they occur. In 2019, Alcoa commissioned an analysis of its maturity in combating modern slavery and has been benchmarking related progress since then.

Our future aims include validating current approaches to retaliation and reprisal risks. Training of all personnel, and strengthened processes for engaging with contractors, are core to this effort. We also aim to bolster the robustness of our supply chain maps to better understand forced labor risks in small-value, local contracts, and to expand our visibility into additional tiers of the supply chain.

We are also working to gain deeper insight into high-risk services like catering, construction, maintenance, and janitorial work. On-site human rights due diligence by our Human Rights CoE and external human rights experts commenced in 2023 at select South American and European operations. This work will continue in 2024 and be elaborated in future communications.

Ultimately, we believe that a deeper understanding of modern slavery risks will empower us to protect workers and make our operations more resilient, better enabling us to operate according to our core values.



Appendix

Reporting frameworks

Criteria for reporting modern slavery risks and management

	Australia	Canada	Norway	Germany	California	France	Netherlands	Switzerland	UK
Applicable Y/N	Y	Y	Y	N	N	N	N <50 ppl	N <10 ppl	<10 ppl
Steps taken to reduce forced/child labor		X	X	X	X				
Structure, activities, supply chains	X	X	X	X					
Policies and DD processes	X	X	X	X	X	X			X
High-risk parts of business and supply chains	X	X	X	X		X			X
Steps taken to assess, prevent and manage identified risks	X	X	X	X	X	X			X
Steps taken to remediate forced labor	X	X	X	X					
Steps taken to repay back wages	X	X	X	X					
Training provided on forced/child labor	X	X		X	X				X
How we assess the effectiveness of our efforts	X	X	X	X					X
Complaints procedure			X	X					
Reporting to/engaging with rightsholders			X						
Links online			X						
Gets senior leadership approval	X			X					
Publication deadline	1-Jul	31-May							



Alcoa Canada Co

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have authority to bind Alcoa Canada Co.



Louis Langlois
President and Treasurer
Member of the Board of Directors

May 23, 2024

ALCOA - ALUMINERIE DE DESCHAMBAULT L.P.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have authority to bind ALCOA - ALUMINERIE DE DESCHAMBAULT L.P.



Louis Langlois

President and Treasurer of Alcoa-Lauralco Management Company, the General Partner of ALCOA - ALUMINERIE DE DESCHAMBAULT L.P.

Member of the Board of Directors of Alcoa-Lauralco Management Company

May 23, 2024

Alcoa Wolinbec Company ULC

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have authority to bind Alcoa Wolinbec Company ULC.



Louis Langlois
President and Treasurer
Member of the Board of Directors

May 23, 2024