



**Alcoa**

# 2024 Modern Slavery Statement

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# About

## About Alcoa's Modern Slavery Statement

Alcoa is committed to respecting human rights across our operations and value chains, in line with our Values to Act with Integrity, Operate with Excellence, Care for People, and Lead with Courage. This commitment is reflected in our human rights policy as well as through our approach to human rights. “Modern slavery” is an umbrella term that includes human trafficking, forced labor, child labor, and other forms of labor exploitation. This global modern slavery statement (“the Statement”) sets out how Alcoa’s values underpin our policies, procedures and actions to assess and address modern slavery risks and lays out how we identify, assess and manage the labor and human rights risks in our operations and supply chains.

We have a zero-tolerance approach to modern slavery. We adhere to relevant laws and regulations relating to modern slavery, and in so doing we commit to transparently report on our efforts to identify these risks. Legislation applicable to Alcoa’s operations include Australia’s *Modern Slavery Act 2018 (Cth)*; Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act S-211 of 2024*; and Norway’s *Transparency Act of 2021*. Entities reporting under specific modern slavery and transparency laws are listed in the Appendix as are the operations covered by such laws.

Where risks are identified, we pursue measures to prevent occurrences and seek remedies for affected people. Alcoa has been reporting on its modern slavery risks in specific regions since 2020 and globally since 2023. This Statement covers our activities during the January 1, 2024 to December 31, 2024 reporting period. All references to “Alcoa”, “the Company”, “we”, “us” and “our” refer to Alcoa Corporation and its controlled entities.

While regulations are tailored to the locations named above, this Statement also covers other Alcoa locations. These include closed or curtailed operations within Australia, where decommissioning, remediation and rehabilitation are ongoing.<sup>1</sup>

<sup>1</sup> Point Henry Site (aluminum smelter and rolling mill) and our Anglesea site (a coal mine and power station)



They also include office settings in Australia, Canada, Hungary, Italy, the Netherlands, Norway, Spain and the United Kingdom (the last of which has modern slavery reporting requirements pursuant to the *Modern Slavery Act 2015 (UK)*). In addition, Alcoa operates in Brazil, Iceland, Spain and in the United States, which do not have specific regulations for modern slavery and human rights reporting, but have non-financial reporting requirements that

we meet. Alcoa's entities within these jurisdictions do not meet the revenue or personnel thresholds for reporting under the applicable legislation at present. In some instances, our reporting for Norway's modern slavery risk is aggregated with the European region, because a large portion of critical materials and services provided to our Norwegian operations are sourced regionally.

## Our Values

### Act with Integrity

- Be open, honest, and accountable
- Do the right thing the right way
- Promote high ethical standards

### Operate with Excellence

- Continually improve standards of operation
- Analyze every angle to overcome difficulty
- Empower people with the right resources to do their best work

### Care for People

- Put safety and health first
- Seek solutions with inclusive teams
- Make decisions with the community in mind

### Lead with Courage

- Embrace opportunities to reinvent
- Innovate for long-term impact
- Challenge the status quo

# Alcoa's Business, Operations, Supply Chains

## Our Business

Alcoa Corporation's purpose is to turn raw potential into real progress. Guided by our purpose and grounded in our values, Alcoa is a global leader in bauxite mining, alumina refining and aluminum smelting and casting, dating back more than 135 years. Alcoa employs approximately 13,900 direct employees in 17 countries. Alcoa remains one of the world's leading producers of bauxite and operates one of the world's largest alumina businesses outside of China. Our culture of operational excellence and continuous improvement is a cornerstone of our success, helping us turn ideas into outcomes, impossibility into impact, and "what if" into "what is."

Our business is organized into two segments: Alumina and Aluminum. Our alumina segment includes our global bauxite mines and alumina refineries. Our aluminum segment encompasses aluminum smelting and casting, as well as the majority of our energy assets. Our smelting operations produce molten primary aluminum which is then formed by casting into common alloy ingot such as t-bar, sow, standard ingot, as well as value-add products such as foundry, billet, rod and slab.

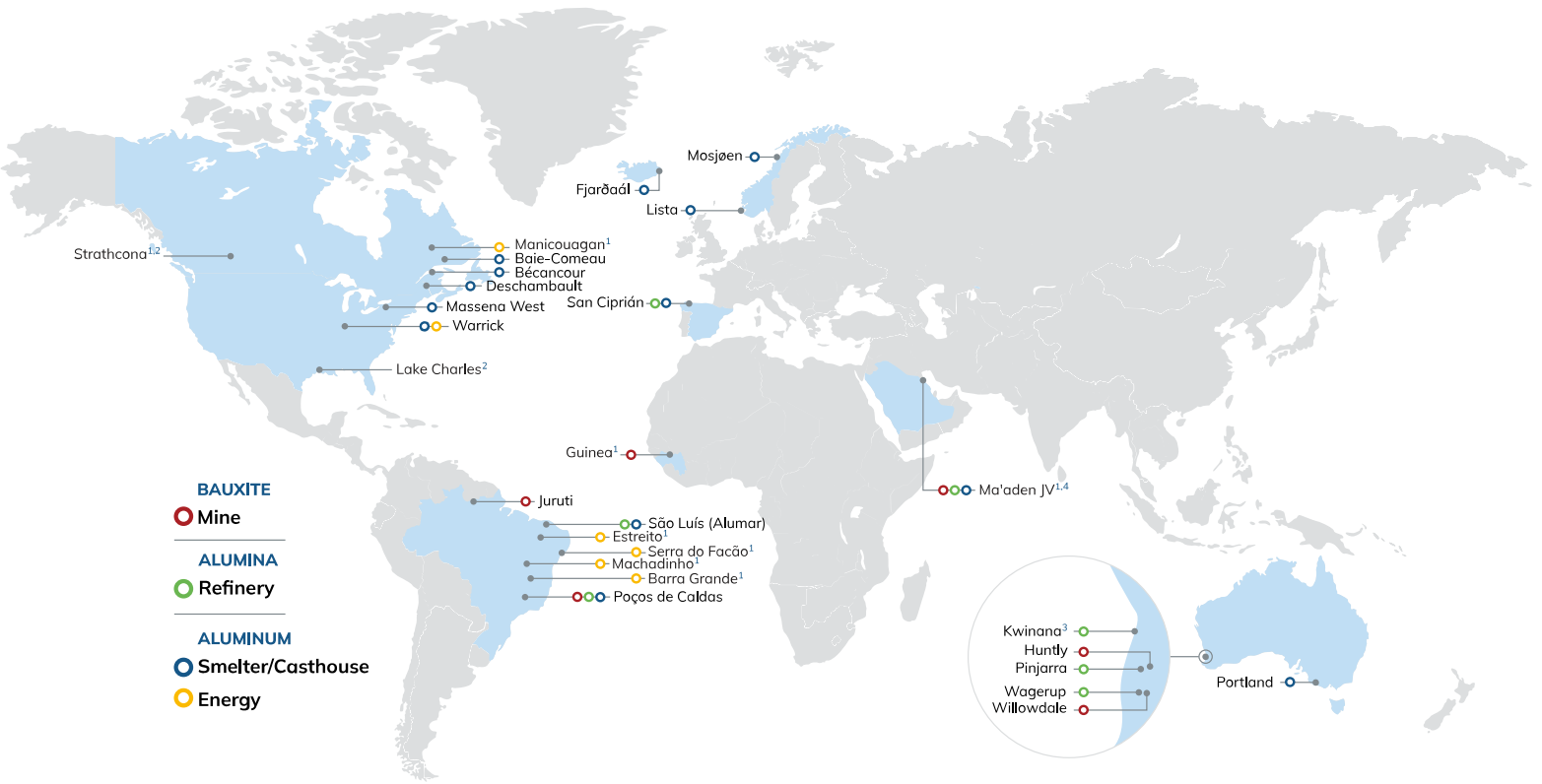
## Operations

The Company is headquartered in Pittsburgh, Pennsylvania, USA, with 26 operating locations across nine countries including Australia, Brazil, Canada, Iceland, Norway, Spain, and the United States of America. Alcoa common stock is listed on the New York Stock Exchange (NYSE: AA), and Alcoa CHESSE Depository Interests are listed the Australian Securities Exchange (ASX: AAI). Alcoa has wholly owned and jointly owned operations in Africa, Australia, Europe, North America and South America, encompassing bauxite mines, alumina refineries, aluminum smelters, and energy assets.<sup>2</sup>

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<sup>2</sup> On August 1, 2024, Alcoa successfully completed the acquisition of Alumina Limited, further strengthening the Company's market leadership. With this acquisition, Alcoa now fully owns and controls the Alcoa World Alumina and Chemicals (AWAC) joint venture, in which it previously held a 60 percent interest. In 2024, AWAC consisted of a number of affiliated entities that owned, operated or had an interest in bauxite mines and alumina refineries in Australia, Brazil, Spain, Saudi Arabia and Guinea and a 55 percent interest in an aluminum smelter in Victoria, Australia.

# Alcoa Locations



Location data as of December 31, 2024

<sup>1</sup> Minority ownership, non-operating partner

<sup>2</sup> Processes petroleum coke, a raw material used to create anodes used in aluminum smelting

<sup>3</sup> Alumina production is fully curtailed

<sup>4</sup> On September 15, 2024, the Company announced the sale of its 25.1% stake in the Ma'aden JVs, expected to close in the second quarter of 2025

## Supply Chains

In addition to approximately 13,900 direct employees that comprise our global workforce, more than 10,000 suppliers across 85 countries serve our global operations, representing US\$11.77 billion in spend.<sup>3</sup>

Our suppliers play an important role in our ability to do business around the world by providing goods and services that support our objective to maintain safe and stable operations. Our complex and integrated network of suppliers provide chemical inputs, alloying metals, hydrocarbons, energy sources, transportation, and labor for an array of functions. Our primary spend categories include:

- Raw materials
- Energy
- Facility maintenance
- Transportation, including maritime transportation

Alcoa recognizes that modern slavery risks exist in every country. According to the [Global Slavery Index](#) (2024), some of Alcoa's operations and suppliers are located in countries with elevated modern slavery risks.<sup>4</sup> We have identified 12 countries in our global footprint and value chain with potentially elevated forced labor risks. The map shows the countries and the associated goods and materials supplied or produced to support Alcoa's operations.

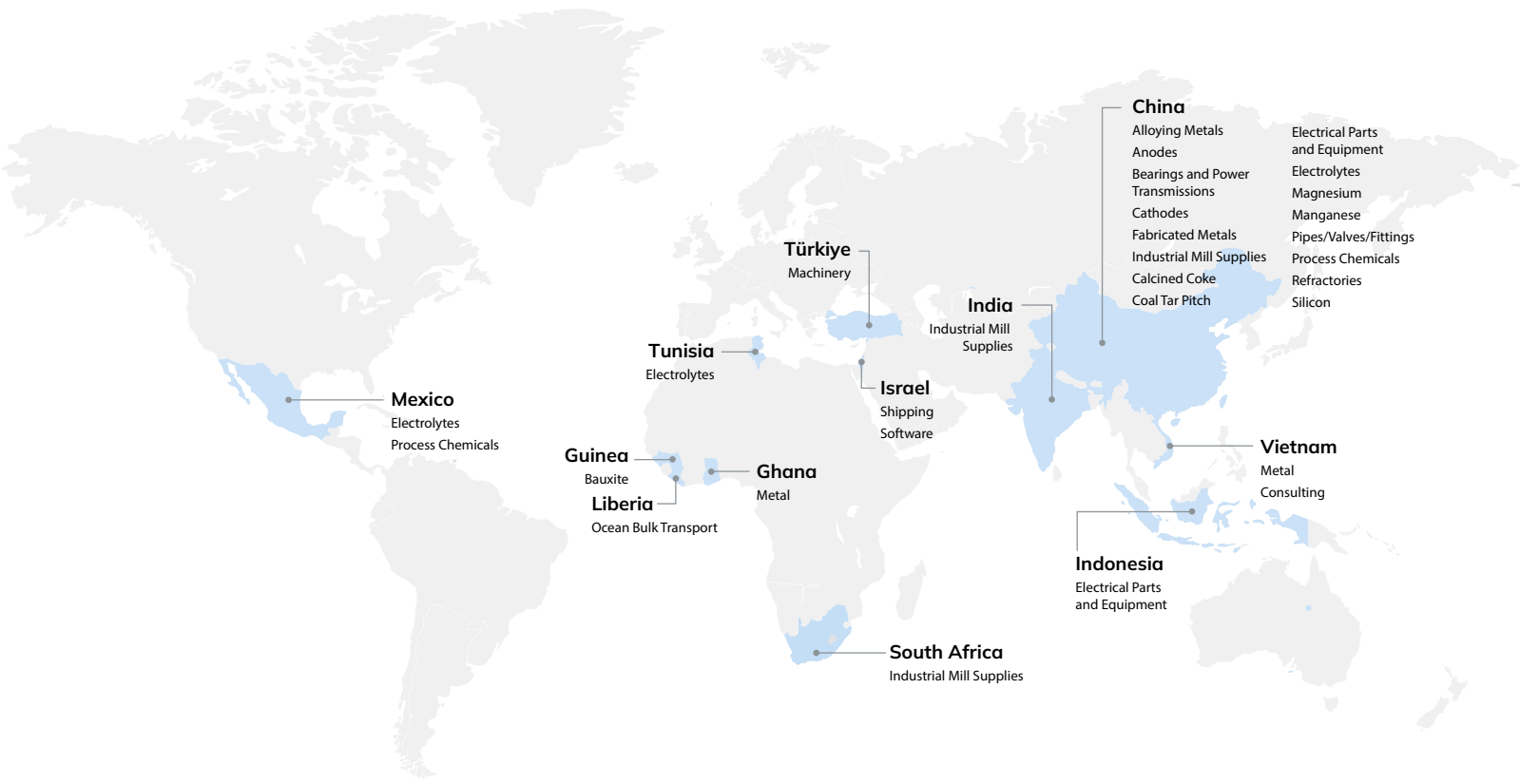
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<sup>3</sup> Information sourced from Alcoa's aggregated database in EcoVadis

<sup>4</sup> <https://www.walkfree.org> this is a comprehensive dataset of modern slavery risks and incidents available today



# Alcoa High-Risk Supplier Locations



Information sourced from Alcoa's internal supplier database

# Governance, Policies and Standards

## Governance

Respect for human rights is embedded throughout the Company. Accountability for the governance and application of Alcoa's standards is held cross-functionally and at the highest levels of the organization.

Daily accountability for human rights risk management is undertaken across our Commercial, External Affairs, and Operations functions. Our Responsible Sourcing team manages our approach to supplier sustainability across the value chain. Our Social Performance and Human Rights team is responsible for implementing and monitoring our human rights approach, globally. Identifying and addressing emerging modern slavery risks is part of our operational risk management approach at each location. Alcoa also has a globally dispersed **Human Rights Council**, which defines and implements management systems that support our human rights approach across our operations and supply chains. It includes representatives from each region and function within Alcoa. The Safety, Sustainability and Public Issues Committee of Alcoa's Board of Directors provides guidance on matters relating to corporate and social responsibility, including social performance, while providing periodic updates on the matters to the full Board.

## Policies and Standards Relevant to Modern Slavery

Alcoa's policies, standards and supplier programs form the basis of our commitment to respecting human rights across the Company's operations and value chains, and to each of its controlled entities. Our Code of Conduct, Human Rights Policy, and Supplier Standards form the basis of our commitment to respecting human rights.

Our [Code of Conduct](#) sets forth expectations regarding how we conduct business worldwide, consistent with our values and applicable laws and regulations. It includes specific language on our commitment to respect human rights.

Our [Human Rights Policy](#) outlines Alcoa's respect for the fundamental human rights of our workers, communities, suppliers and contractors. It 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. Respecting rights is an active responsibility, requiring that we conduct due diligence to identify, monitor and remediate impacts on those affected by our operations and supply chains.

Our [Supplier Standards](#) outline our expectations for all businesses and suppliers that work with us and form part of our tender documentation and contracts. They set expectations around wages, labor rights, and complaint mechanisms. In 2024, Alcoa implemented a new Contractor Management Standard, which covers contractor work management, safety, productivity, and governance.

In addition to these key instruments, Alcoa's Anti-Corruption Policy and corresponding procedures prohibit Alcoa, or any third party acting on Alcoa's behalf, from engaging in corruption including coercion or fraud.

# Risk Assessment and Due Diligence

## Risk Assessment – Cause, Contribution and Linkage to Risks

Modern slavery risks are heightened in certain sociopolitical contexts and industries. Alcoa evaluates modern slavery risks in both our operations and our supply chain using the concepts of causation, contribution and direct linkage, which are enumerated in the United Nations Guiding Principles (UNGPs) on Business and Human Rights.<sup>5</sup> Understanding how Alcoa may be connected to a risk or impact in our operations and supply chains informs our approach to mitigation and remediation. Operations and suppliers have each been screened for human rights risks, to prioritize sites for independent, on-site human rights due diligence.

## Due Diligence

### Operations

All of Alcoa's operating locations undergo periodic site-level human rights due diligence. Field-based human rights assessments are carried out on a schedule aligned to our Aluminium Stewardship Initiative (ASI) audit recertification calendar, ensuring every certified site is evaluated in detail for forced labor risk at least every three years. Alcoa assesses and manages human rights risks and impacts through both internal and third-party processes, commensurate with the scope and scale of risk, as laid out in the UNGPs on Business and Human Rights.

Assessments include a review of documents such as site-level policies, records related to health and safety risks, wages, site-level supplier protocols, and security incident reports. They may also involve fieldwork, which includes direct observation, interviews, and group discussions with employees, contractors, managers, community members, and potentially vulnerable sub-populations. Human rights due diligence supplements location-level assessments of critical equipment, operational workflows, and risk-based health and safety audits.

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<sup>5</sup> According to the UNGPs, a company may *cause* an impact on worker welfare by directly establishing the conditions of risk through, for example, weak policies/procedures/oversight in workforce hiring. A company may *contribute* to an 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 adequately trained workers. A company may be *directly linked* to modern slavery through a third-party contractor or investment, for example, if the third party engages in forced labor or fails to verify worker ages, against the terms of the contract.

We rank human rights concerns based on the extent, intensity, likelihood and remediability of a potential impact. Identified risks are reported to the relevant managers responsible for mitigation, management and remediation and form the basis for action plans.

Alcoa's internal human rights due diligence processes evaluate worker ages, young apprentice protections, collective bargaining agreements, unionization rights, bonded labor risks (e.g. recruitment fees, wage deductions, and worker debts), working hours, discrimination risks, and health and safety exposures. Our suite of policies, procedures and guidance tools underpin our approaches to risk management for worker welfare. In 2024, we commissioned or completed independent human rights due diligence at two locations in Brazil, three locations in Canada, one location in Spain, and one location in the U.S.

## Supply Chain

Human rights and modern slavery risks in our supply chain are managed through our Responsible Sourcing Framework. Under the Responsible Sourcing Framework, the Supplier Sustainability Program (SSP) lays out standards and expectations regarding human rights, environmental performance, social practices and governance. The SSP also enables us to evaluate new suppliers and to monitor the sustainability performance of existing suppliers over time.

## Three Components of the Supplier Sustainability Program



The SSP integrates risk assessment, due diligence, transparency, and risk management, through an “assess, audit, advance” process.

**Assess:** Initially, suppliers are screened against more than 20 sustainability criteria across the environmental, social and governance (ESG) spectrum. The risk outcomes of this screening determine which suppliers are engaged for further due diligence. Our full supplier base is screened for human rights and other ESG risks and cross-checked against other known sanction lists. Businesses are disqualified from participation in our supply chain where sanctions are identified. Suppliers classified as higher-risk by our third-party risk assessment tool face heightened due diligence, including digital audits, more rigorous timetables for re-evaluation and, in some cases, in-person audit (see ‘Engagement with suppliers’, below).

**Audit:** Utilizing our program partners, suppliers are invited to complete digital questionnaires specific to their countries of operation, industry and risk. Select suppliers are asked to participate in our Supplier Site Collaboration Program.

**Advance:** All suppliers are benchmarked for improvement over time. Alcoa provides e-learning as well as on-site support to help our suppliers advance in their human rights and sustainability performance. E-learning includes coaching and training modules within our supplier digital audit platform.

It is complemented with direct communication with sites where new risks emerge. Our on-site field audits are elaborated below. The program meets the requirements of the London Metal Exchange (LME) Responsible Sourcing Policy, ASI Performance Standard and ASI Chain of Custody Standard.

## Engagement with Suppliers

Alcoa engages directly with suppliers through location-level operational human rights due diligence, as well as through Supplier Site Collaboration (SSC), a dedicated engagement process within the Supplier Sustainability Program. SSCs are on-site, in-person audits (“collaborations”) conducted by Alcoa personnel. Our SSC program is carried out by trained personnel who use direct observation, document review, and interviews to evaluate suppliers’ human rights and forced labor risks, and risk management to deepen our engagement with those suppliers to support improvements.

Suppliers are invited to participate in SSCs because they meet risk criteria laid out by Alcoa. These conditions are as follows:

- (1) the supplier receives a low score under the labor and human rights section of supplier ratings assessment;
- (2) the supplier has a significant finding identified through our media monitoring program; or

- (3) the supplier is new to Alcoa and operates in a potentially higher risk industry and/or country. Suppliers can also undergo Alcoa’s participatory audits for other reasons, at the discretion of Alcoa’s responsible sourcing team.

In 2023, Alcoa commenced with five SSC audits and expanded to 15 in 2024. SSCs now feed into our broader human rights due diligence processes, through iterative feedback loops of information sharing and solution-building. In 2024 they helped us gain insights into catering, construction, janitorial, maintenance and other supplier types (see “Findings”, page 16).



# Reporting, Findings and Remediation Measures

## Complaint and Incident Reporting

Alcoa's confidential, company-wide ethics and complaint mechanism, Integrity Line, is available free to workers, suppliers, contractors, community members and all other concerned parties. Through training and worksite communications, we encourage employees, contractors, and suppliers to report issues or concerns. Managed by a third party, Navex Global, the Integrity Line is available to anyone within our value 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 is 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 Ethics and Compliance (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 engage PricewaterhouseCoopers PwC to undertake quarterly audits and receive an annual benchmarking report from Navex Global. The Navex report contains metrics for report volume, report allegation categories, anonymous versus named reports, follow-up and substantiation rates, case closure times, and intake methods.

Alcoa is developing approaches, in addition to the Integrity Line, for responding to queries, complaints and information requests at the location level, several of which were operational in 2024. Modern slavery allegations will continue to be escalated to the Human Rights team, as appropriate. Operations-level complaints mechanisms are being rolled out across all sites, through collaboration among Alcoa's Social Performance, Legal, and Human Rights functions.

# Findings, Incidents and Interventions During the Reporting Period

Alcoa used findings from complaint reporting mechanisms, due diligence, and audit processes in 2024 to shape specific interventions with select suppliers and locations.

## Operations

In 2024, Alcoa carried out human rights due diligence at seven locations across three continents. These assessments are opportunities for risk and impact identification as well as for global advancement of good practices.

No cases of forced labor or modern slavery were identified in Alcoa's direct operations. Alternatively, one operating location impacted by a labor shortage found that efforts to create a more inclusive workplace expanded the available labor force. Labor shortages sometimes drive longer working hours and lower worker morale; Alcoa's operations turned that challenge into a human rights opportunity.

While no violation of laws was identified, human rights due diligence identified a risk of long working hours in the United States, where maximum working hours are not established within the law. In response to this possible risk, we began a review of worker hours, union terms for collective bargaining agreements, contextual drivers for labor relations, and technical evaluations

for worker welfare risks. Efforts to strengthen assurance of adequate working conditions are ongoing in 2025.

## Supply Chain

While no specific risks related to modern slavery were identified in Alcoa's direct operations in 2024, human rights due diligence identified potential risks to workers, including contractors. An example of actions taken to manage these risks has been the proactive roll-out of a revised fatigue management standard, accompanied by improved communication related to workplace health and safety, including fatigue risk associated with long hours.

Alcoa strives to proactively manage labor rights risks in our supply chain. Our global mapping of high-risk suppliers is analyzed by region and by spend. In 2024, our continuous online screening tools produced no findings of severe concern.<sup>6</sup> Supplemental to online screening, Alcoa carried out SSCs at 15 suppliers across three continents. These included goods and services suppliers operating within our locations and off-site. Through the SSCs we found potential "red flags" or risk indicators defined in our audit

<sup>6</sup> Severity of these findings is defined in the Supplier Sustainability Program and Responsible Sourcing Standard.

protocol in Brazil, Canada, China, India and Spain. These red flags linked to housing and working hours, safety protections, and complaint mechanisms. In response to risks identified through our on-line and in-person screening and assessment processes, tailored interventions were coordinated with support from corporate functions in Legal, Human Resources, and Human Rights. Health, safety, security, and performance reviews were undertaken with relevant workers. New management strategies have been developed for at-risk workforce, and new accommodations were established, as verified in follow-up investigations. Further reviews are underway to better understand risks and risk management approaches.

In 2023, we found that supplier workers did not consistently have awareness of, or access to, Alcoa's or their own employers' complaint mechanisms. We recommended these workers receive targeted training on complaint processes available to them, and for their management to undertake e-learning on labor rights to heighten their awareness of ESG disclosure expectations. In 2024, we provided resources and guidance to higher-risk suppliers, increasing the number of suppliers with whistleblowing or complaint mechanisms from 57% to 70%. Labor rights e-training was undertaken by 81 suppliers in 2024, up from 51 in 2023. For 2025, we secured access to labor rights e-training for smaller suppliers that previously could not affordably access modules.

5

Potential red flags identified in SSCs

0

Severe controversies in headline risk monitoring

15

Supplier Site Collaborations

64%

Suppliers with improved audit scores over 2023

70%

Audited suppliers with complaint systems

932

Suppliers that underwent third-party audits

In 2024 we identified a category of contractor workers that were at risk of working longer hours in Brazil. Our procurement and human rights teams drew in support from Legal and Human Resources at the corporate level, as well as experts in Health and Safety, Security, and Asset Integrity at the operational and regional level. We identified ways to improve outcomes for workers, production, and environmental management. Interventions included specialized training, robust spare-part inventory strategies, scheduled downtime, and the insourcing of key tasks. These interventions enabled us to maintain continuity of employment for workers and drove positive change at the location.

# Remediation

Alcoa’s Human Rights Policy sets out requirements for effective remediation should we cause or contribute to an actual human rights impact. We identify potential adverse impacts on human rights through our Supplier Sustainability Program, human rights due diligence, and complaint mechanisms. Improvements are initiated through corrective action plans, which may include the establishment of new operational controls, oversight procedures, key performance indicators, and/or training requirements carried out in e-learning modules.

Remediation of forced labor requires case-specific approaches. To guide development of such approaches, Alcoa collaborated with Australia’s Human Rights Resources and Energy Collaborative (HRREC), the human rights advocacy group 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.

# Training

Alcoa seeks to engage its full workforce in the task of identifying and eradicating forced labor. Employees are required to undertake annual training on Alcoa’s Code of Conduct, which includes references to human rights, supplemented by regional and departmental training as appropriate. In 2024, 100% of salaried employees had completed the annual Code of Conduct training. Technical personnel, including maintenance engineers, supervisors, and auditors, receive targeted training modules on worker welfare. By reinforcing the link between robust maintenance engineering practices and labor rights, we empower our workforce to spot modern slavery indicators early. In Brazil, Alcoa deploys regional human rights training annually across functions. Our global procurement team has developed

an internal Procurement University with modules addressing responsible sourcing, human rights awareness, modern slavery, and chain of custody.

In 2024, the Human Rights Council established a three-year plan to pursue Alcoa’s human rights priorities, supported through 11 workstreams including one focused on training. Alcoa’s year-one target for the training workstream was to define a training matrix across corporate and location footprints, identify synergies with other training, and develop a strategy for deployment. It is one of eight workstream targets that was fully met in 2024. Two additional targets were in progress by December 2024.

# Evaluating Our Effectiveness

## Operations

Alcoa monitors the effectiveness of our efforts to combat modern slavery in our operations by benchmarking key indicators for favorable working conditions. These include fair wage assessments, the availability of collective bargaining agreements, health and safety data, and actions to prevent child labor in the workforce. We also consider complaint logs to monitor whether workers perceive the working environment as rights-respectful.

To support the capture of data within Alcoa’s global supply chain and assess our program performance and effectiveness, Alcoa partners with EcoVadis, using their global platform to measure and manage risk and compliance, to drive impact within our value chain. In 2024, Alcoa maintained its overall rating of 74 on the EcoVadis scorecard, even as performance requirements increased year over year. EcoVadis categorizes this rating as “high”. This sets Alcoa in the top 4th percentile of metals manufacturers overall, and top 10th percentile in the Labor & Human Rights category.

## Supply Chain

All SSP data is analyzed for actionable insights. Key performance indicators are tracked alongside supplier risk scores and performance change over time, as well as industry-level risk assessments. Supplier risk scores are accompanied by a qualitative report on strengths and weaknesses. These metrics help Alcoa track progress of our suppliers’ sustainability performance, as well as in their transparency.

As is the case with Alcoa, our suppliers are demonstrating continuous improvement on the EcoVadis scorecard, including an increase in the number of suppliers that have developed their own responsible sourcing programs and complaint mechanisms.

### Examples of Indicators of Effective Supply Chain Oversight

**10,269**

suppliers assessed in 2024 compared to 10,044 in 2023

**53%**

of Alcoa’s annual spend represented by 932 audited suppliers compared to 51% in 2023

**148**

identified as higher risk in 2024

**52.4**

average Alcoa supplier score compared to 50.0 in 2023 (vs. 47.5 average EcoVadis score in 2024)



## Independent Certification

Our commitment to prevent modern slavery is reinforced through our participation in industry-leading multi-stakeholder initiatives. As a member of the ASI, Alcoa has certified 18 of our global operations under the ASI Performance Standard and ASI Chain of Custody certification. We also have certification for our global enterprise at the corporate level.

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

## Future Focus

Alcoa's processes for identifying, preventing and remediating modern slavery risks advanced in 2024. We expect to continue enhancing our efforts and learning from our efforts to manage contractors and employees in contexts with variable labor protections in 2025. Both our Human Rights Policy and our Human Rights Standard are slated for review and update in 2025. In 2025, we also expect to introduce human rights training for all Alcoa personnel to further broaden awareness of human rights and modern slavery across our workforce.

## Internal Consultation for Development, Validation and Attestation of the Statement

This Statement was reviewed and approved by Alcoa’s Human Rights Council and members of Alcoa’s executive leadership, with input from leaders in Alcoa’s functional departments and regions. In accordance with the *Modern Slavery Act 2018 (Cth)*, the Statement was approved by the Alcoa of Australia Limited board of directors on behalf of all of our Australian entities and signed by our Vice President of Operations Australia (as the responsible member) as required pursuant to that Act. Prior to submission in Canada, it was reviewed and approved by the governance bodies of Canadian entities controlled by Alcoa.

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<sup>7</sup> This includes regional input from North America, Europe, Brazil and Australia, and input from functions in responsible sourcing, human rights, ethics & compliance, sustainability, health & safety, environment, asset integrity, and legal teams.

# Appendix

## Australian Entities

Reporting Entity	ACN	Registered Address	Activities, Operations, Ownership
<b>Alcoa of Australia Limited</b>	000 364 992	181-205 Davy Street, Booragoon WA 6154	Mining, refining, smelting, casting
<b>Alcoa Australia Holdings Pty Ltd</b>	096 987 370	181-205 Davy Street, Booragoon WA 6154	Shareholding
<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.
<b>Alcoa Portland Aluminium Pty Ltd</b>	006 306 752	181-205 Davy Street, Booragoon WA 6154	This entity is a 100% owned subsidiary of Alcoa of Australia Limited and acts as the manager for the Portland Smelter. The Board of Directors of Alcoa Portland Aluminum Pty Ltd wholly consists of directors who are also directors of Alcoa of Australia Limited.
<b>Eastern Aluminium Pty Ltd</b>	062 841 007	181-205 Davy Street, Booragoon WA 6154	Non-operational; its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.
<b>Hedges Gold Pty Ltd</b>	005 592 067	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions; its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.
<b>ACAP Australia Pty Ltd</b>	058 452 556	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions; its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.
<b>Eastern Aluminium (Portland) Pty Ltd</b>	067 391 824	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions; its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.

Reporting Entity	ACN	Registered Address	Activities, Operations, Ownership
<b>Alcoa Energy Holdings Australia Pty Ltd</b>	110 752 808	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions; its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.
<b>Alcoa Share Plan Administration Pty Ltd</b>	065 591 657	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions; its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.
<b>AAC Investments Australia Pty Ltd</b>	673 884 207	181-205 Davy Street, Booragoon WA 6154	Shareholding.
<b>AAC 1 Investments Australia Pty Ltd</b>	675 584 175	181-205 Davy Street, Booragoon WA 6154	Shareholding.
<b>AAC 2 Investments Australia Pty Ltd</b>	675 585 850	181-205 Davy Street, Booragoon WA 6154	Shareholding.
<b>Alumina Pty Ltd</b>	004 820 419	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions; its Board of Directors wholly consists of directors who are also directors of Alcoa of Australia Limited.
<b>Alumina International Holdings Pty Ltd</b>	006 840 731	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions; its Board of Directors wholly consists of directors who are also directors of Alumina Pty Ltd.
<b>Alumina Finance Pty Ltd</b>	130 920 562	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions; its Board of Directors wholly consists of directors who are also directors of Alumina Pty Ltd.
<b>Alumina Brazil Holdings Pty Ltd</b>	121 881 196	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions; its Board of Directors wholly consists of directors who are also directors of Alumina Pty Ltd.
<b>Alumina Employee Share Plan Pty Ltd</b>	103 902 012	181-205 Davy Street, Booragoon WA 6154	This entity is not involved in the operational or supply chain making decisions; its Board of Directors wholly consists of directors who are also directors of Alumina Pty Ltd.

## Canadian Reporting Entities

Reporting Entity	Business Number	Registered Address	Activities, Operations, Ownership
Alcoa Canada Co	13811 7494	2310-1 Place Ville-Marie Montreal (Quebec) H3B3M5	Ownership of smelting & casting at Baie-Comeau 100% owned by Alcoa Corporation
Aluminerie de Deschambault LP	10017 4531	1, boul. Des Sources Deschambault-Grondines (Quebec) G0A1S0	Ownership of smelting & casting at Deschambault 100% owned by Alcoa Corporation
Alcoa Wolinbec Company ULC	83316 5368	666 Burrard Street, Suite 1700, Park Place Vancouver (British Columbia) V6C2X8	Ownership of smelting & casting at Bécancour, a smelter that is 25.05% owned by Rio Tinto 100% owned by Alcoa Corporation directly and through subsidiaries Wolinbec, Alcoa Canada, and Reynolds Becancour

## Norwegian Reporting Entities

Reporting Entity	Business Number	Registered Address	Activities, Operations, Ownership
Alcoa Norway AS	928 825 345	Havnegata 40 NO-8663 Mosjøen	Ownership of smelting & casting at Mosjøen and Lista 100% owned by Alcoa Corporation

# Locations Covered by the Statement

Legislation applicable to Alcoa’s operations include Australia’s *Modern Slavery Act 2018 (Cth)*; Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act S-211 of 2024*; and Norway’s *Transparency Act of 2021*. Entities reporting under specific modern slavery and transparency laws are listed in the Appendix. Operations covered by such laws are:

## Entities Subject to Modern Slavery Reporting Requirements

<b>Australia</b>
Port facilities: Bunbury & Kwinana
Bauxite mines: Huntly & Willowdale
Alumina refineries: Kwinana, Pinjarra and Wagerup
Aluminum smelter: Portland
Cattle farms: Pinjarra and Wagerup
<b>Canada</b>
Aluminum smelters: Baie Comeau, Bécancour, Deschambault
<b>Norway</b>
Aluminum smelters: Lista and Mosjøen



