



GLOBAL SECURITY POLICY

This policy applies worldwide to Alcoa and its subsidiaries, affiliates, partnerships, ventures, and other business associations that are effectively controlled by Alcoa, directly or indirectly (together the "Company"), and all directors, officers and employees of the Company.

Alcoa is committed to safeguarding the Company's human, intellectual, financial, and physical assets by providing a safe and secure work and travel environment, and minimizing security risks and threats to personnel, assets and reputation.

Definitions:

- Assets – all tangible and intangible assets of the Company, including Company Property.
- Company Property - all offices, manufacturing facilities, warehouses and other physical locations used by the Company and any of its affiliates including, without limitation, all parking areas.
- Firearm - a handgun, shotgun, rifle and any other device from which a projectile may be fired by an explosive.
- Personnel – all employees of the Company.
- Weapon - a Firearm, spring-bladed knife, any knife with a blade of four inches or more, explosives, any object that could be used to injure or intimidate others, and any other item whose purpose or use is to cause physical or emotional harm.

Requirements:

All personnel must safeguard assets from loss, damage or misuse and contribute to a safe and secure work and travel environment for personnel by complying with the Company's security programs, which are focused on 7 key areas:

- Physical security
- Travel security
- Security investigations
- Crisis management
- Violence-free workplace
- Executive protection
- Human rights

Personnel will promote, contribute, and execute sound security practices as communicated from time to time by Alcoa Global Security and will comply (and encourage other personnel to comply) with applicable security instructions, rules, procedures and programs.

Physical Security. Personnel are prohibited from circumventing or breaching established Company Property access controls, leaving Company Property areas and Assets unsecured, loaning access cards or keys to individuals who are not authorized to use such cards or keys, or otherwise allowing unauthorized individuals access to Company Property or Assets. Refer to Global Access Control Policy and Alcoa Global Physical Security Standard 4.1.3.

Travel Security. Personnel must book all Company-related travel through the Company's approved corporate online booking tool (e.g. Concur, Amex, etc.) or travel agents. Personnel travelling to areas of



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increased risk as identified in the Company's travel security program are required to review with their manager the mitigation strategies developed by Alcoa Global Security and obtain approval prior to travel from Alcoa Global Security and their Management Team. Alcoa Global Security in conjunction with Alcoa T&E and Alcoa's Global Health Director (as applicable) will advise of any suspensions or other travel restrictions from time to time to certain nations, regions and/or on particular carriers if the travel is deemed to be too high risk to ensure the safety of all Alcoa travelers.

Security Investigations. Alcoa Global Security will conduct or coordinate investigations of security incidents, including threats of violence against personnel or assets and other criminal matters as required, and will review and monitor security violations to determine security vulnerabilities and ensure the Company takes corrective actions. Alcoa Global Security will assist in investigations led by Legal, Ethics and Compliance, Internal Audit, Human Resources, and other Company departments as appropriate. Personnel must cooperate fully with Company investigations into allegations of security incidents and criminal matters and provide honest and accurate responses.

Crisis Management Plan (CMP). Provides Alcoa executive leadership with a timely and orderly framework for decision-making during times of actual or potential crises that may do significant harm to the Company. Refer to the Crisis Reporting Policy.

Violence-Free Workplace and Weapons Prohibition. The Company promotes and actively supports a workplace that is free from violence, threats and intimidation, and is committed to the prompt investigation of any such allegations. Acts or threats of violence, implied or direct, including intimidation, are strictly prohibited. In connection with promoting a violence-free workplace and to the extent allowed by law, the Company prohibits the possession, use, and transportation of weapons when on Company Property and/or when conducting Company business. This prohibition, except where prohibited by law, applies to personnel conducting Company business on or off Company property, and in all Company vehicles, whether rented or owned (including private vehicles being used for Company business).

Executive Protection. Alcoa Global Security will manage the protection of Alcoa's executive personnel to secure ground transportation, lodging and personal protection, as appropriate.

Human Rights. The Company is committed to policies and procedures that promote human rights in all locations in which the Company operates. The Company will promote and require human rights protections to all who have interactions with private and public security forces who are utilized or employed by the Company.