



GLOBAL IMPOUNDMENT POLICY

This Alcoa Global Impoundment Policy (the 'Policy') is applicable to any location Alcoa directly controls and provides direction for the management and governance of our Impoundment assets. The Policy will also be used to encourage leading practice management and governance practices at Alcoa's joint ventures where the Company does not have direct control of operations.

An **Impoundment** is defined as any dam, or other engineered earthen structure, intended to confine a body of water (fresh, alkaline, or acidic), bauxite mine tailings or bauxite refining residue, or any other solid or liquid waste material.

Alcoa's size limit criteria for impoundment public disclosures are:

- Greater than 3 hectares (Ha) in area, or
- Height greater than 2 meters (m) above low point of surrounding grade.

This policy excludes:

- i. In-ground impoundments (mine pits, ground level ponds, etc.).
- ii. Hydroelectric and freshwater concrete dams and these governed by the location specific country laws.

A '**Location**' is an Alcoa facility that contains mining, refining, or smelting facilities together with Impoundments in one geographical area. The facility maybe active, inactive, or closed.

Impoundment Vision

Zero harm to people or the environment.

Impoundment Mission

Alcoa will ensure that all new and existing Alcoa Impoundments are planned, designed, constructed, operated, maintained, and closed as designed, in accordance with expected performance, all applicable local legal requirements, Alcoa mandated Impoundment Standards, the Global Industry Standard on Tailings Management (GISTM) and the International Council of Mining and Metals (ICMM) mandated requirements.

Impoundment Policy

Alcoa is committed to:

a) Governance

- Adhere to all applicable laws and regulations related to impoundment management of the country in which the respective Impoundments are located.
- Ensure that Alcoa Mandated Impoundment Standards and Guidelines are followed and are revised to align with changes in Best Practice Tailing Management Guidance.
- Clearly define Impoundment roles and responsibilities in accordance with the GISTM, including the appointment of an Impoundment Accountable Executive and location responsible persons including:
 - I. the Responsible Tailings Facilities Engineer (RTFE), and
 - II. the Engineer of Record (EoR)
- Implementing periodic independent review throughout the impoundments lifecycle via the application of Independent Technical Review Boards (ITRB). ITRB's are mandatory for Extreme and Very High GISTM consequence category rated Impoundments.
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GLOBAL IMPOUNDMENT POLICY

- Implement Impoundment governance and reporting processes, including the Alcoa Impoundment Lead Team (AILT) and the Alcoa Impoundment Steering Committee (AISC)
- Undertake external third-party audits as well as internal Alcoa Self-Assessment Tool (ASAT) audits on all locations containing Impoundments.
- Update the Alcoa Impoundments database annually (July of each calendar year) and publish the tailings only component of the impoundment database (or by exception), on the Alcoa corporate website (www.alcoa.com).

b) Impoundment Locations

- Ensure that each location have sufficient resources to meet our obligations to design, construct, manage, maintain, close, and govern the impoundments in accordance with this policy. This is to include resourcing personnel with the right level of skills, experience, qualifications, and competence, as well as access to sufficient financial capacity to meet our obligations.
- Ensure that each location maintains critical impoundment documents including a detailed “knowledge base” containing – design basis report, design specifications, construction reports “as built” data, geotechnical data, consequence classification assessments, operations maintenance and surveillance manuals, annual independent third-party inspection reports, masterplans, dam break assessments and, emergency preparedness plans and response plans.
- Ensure that each location has current impoundment risk management plans with effective control and mitigation strategies.
- Ensure that any deviations from the approved impoundment design/operating conditions will be communicated immediately to the location’s Responsible Facility Tailings Engineer, the Location’s Manager, and the Global Impoundment Manager. Immediate countermeasures to address any impact from the deviation must be established.
- Undertake appropriate Impoundment closure planning and progressive execution that will leave safe and stable impoundments that considers post closure land uses.

c) Environment, Health, Safety and Community

- Respect human rights in accordance with the United Nations Guiding Principles on Business and Human Rights.
- Maintain and apply up-to-date Alcoa Environmental Standards that align to community and industry expectations at all Locations.
- Enhance resilience to climate change events by updating and applying industry learnings.
- Ensure that any new Impoundment development actively engages and considers the effects on the environment and the community.

d) Continual Improvement

- Continually improve the Alcoa Impoundment standards, guidelines and processes as appropriate based on internal and external lessons learned, revisions to referenced standards (including Australian National Council on Large Dams – Guidelines on Tailings Dams, Planning, Design, Construction, Operation and Closure and the Mining Association of Canada – A Guide to the Management of Tailings Facilities), and information gained from collaboration from other Impoundment operators.



GLOBAL IMPOUNDMENT POLICY

- Pursue technologies to reduce the impoundment storage requirements/footprint and associated risks and improved landform stability.
- Actively engage with external tailings working groups, peer organizations and collaborate openly with other Impoundment operators to improve Impoundment safety management practices.

e) References

- i. Alcoa Mandated Impoundment Standards
- ii. Global Industry Standard on Tailings Management (GISTM), released 5th August 2020
- iii. International Council on Metals and Mining (ICMM) – www.icmm.com, including ICMM Member commitments relating to Tailing Management.
 - ICMM 10 Sustainability Principles
 - ICMM Position Statement: Preventing Catastrophic Failure of Tailings Facilities 2019
 - ICMM GISTM Conformance Protocols (2021), 6th May 2021
 - ICMM Best Practice Tailings Guide – **non binding reference material only**
- iv. Australian National Council on Large Dams (ANCOLD) – Guidelines on Tailings Dams, Planning, Design, Construction, Operation and Closure Rev 1 2019.
- v. Mining Association of Canada (MAC) – A Guide to the Management of Tailings Facilities V3.2 (2021).