

Alcoa Integrity Line

Leading with Integrity



“When you’re thoughtful about how to drive decisions with integrity, you succeed because you are focused on doing the right thing.”

ROY HARVEY, CEO



HOW CAN I CONTACT THE INTEGRITY LINE?

Use any of the four methods below to contact the Integrity Line:



PHONE:

Call the free phone number listed below for your country

Country	Integrity Line Number
Australia	1-800-00-2806
Brazil	0800-891-2552
Canada	English: 800-346-7319 French: 866-269-7644
China	400-601-5382
Hungary	0680982577
Iceland	800-8301
Italy	800-784-622
Netherlands	0800-022-4053 For mobile use only: 0800-292-9203
Norway	800-12-410
Spain	900-95-1247 For mobile use only: 900-822-547
Suriname	Step 1: 156 Step 2: 866-269-7649
Switzerland	0800-56-4358
Saudi Arabia	1-800-346-7319
United States	1-800-346-7319

Call **FREE** of charge, 24 hours a day



WEBSITE:

www.AlcoaEthicsandCompliance.com



MAIL:

Alcoa Ethics and Compliance Organization
201 Isabella Street
Pittsburgh, PA 15212
United States of America



E-MAIL:

EthicsandCompliance@alcoa.com



Alcoa’s Code of Conduct is a roadmap for Leading with Integrity, ensuring we live up to our high standards, and guiding us to do the “right thing” wherever in the world we do business. Access the Code at <https://myalcoa.alcoa.com/Code> or contact Human Resources to request a copy.

SEEKING ASSISTANCE

You may find yourself in a situation that raises concerns or where the choice is not clear. Alcoa has many resources that can help you:

- Your supervisor or team leader
- Human Resources Department
- Ethics and Compliance Organization
- Legal Department
- Your Integrity Champion
- Integrity Line
- Subject matter experts (e.g., Corporate Finance, Audit, Global Security, Procurement)

WHAT IS ALCOA'S INTEGRITY LINE?

The Integrity Line is available globally for you to seek advice or raise a concern, 24 hours a day, 7 days a week, in multiple languages. Anyone can call at no cost. Reports can also be filed online at: www.AlcoaEthicsandCompliance.com

As permitted by local law, the Integrity Line is another confidential way to report suspected workplace violations or to get advice about appropriate business conduct and practices.

WHEN CAN I USE THE INTEGRITY LINE?

Subject to local law, contact the Integrity Line if you:

- Need advice or have a question
- Wish to raise an issue or concern
- Raised an issue or concern and were not satisfied
- Are not sure where to go for information
- Are uncomfortable using one of the other resources



WHY IS THE INTEGRITY LINE IMPORTANT?

The Integrity Line is a place you can go to seek advice or report concerns. Use of the Integrity Line protects our employees, customers, suppliers and our company from inappropriate and harmful misconduct.

ALCOA'S NO-RETALIATION POLICY

Alcoa has a no-retaliation policy. No one can take action against you for asking a question or raising a concern in good faith. If you feel that you or any of your colleagues are being retaliated against, report it immediately. Alcoa takes all allegations of retaliation seriously and will promptly and thoroughly investigate. If the company finds that retaliation occurred, appropriate disciplinary action will be taken. The intentional filing of false information through the Integrity Line could expose the reporter to disciplinary action.

WHAT HAPPENS WHEN I MAKE A REPORT?

All allegations of violation of Alcoa's Code of Conduct, policies, procedures and laws will be reviewed and investigated as required by law and Alcoa's investigations guidelines:

- An independent company receives all reported issues and concerns and promptly directs them to Alcoa's Ethics and Compliance (E&C) Organization for follow-up.
- The reporter is given a private code they can reference for investigation status updates. The reporter may obtain updates by calling the Integrity Line, checking the web reporting site, or contacting the investigator directly.
- The E&C Organization conducts investigations of matters that should not be reviewed at the location level. Where appropriate, the E&C Organization sends reports directly to the named Alcoa location for investigation.

- Investigations are handled promptly, thoroughly and in a confidential manner. Complex investigations may take longer.
- The cooperation and truthfulness of all parties is critical to the process.
- The identity of the reporter is kept strictly confidential throughout the process, and only disclosed to authorized persons, when necessary, to carry out an investigation or as required by law.
- Subject to local law, the reporter and any employees implicated in the report may have the right to access, correct and delete any inaccurate or irrelevant data pertaining to the case.
- Where appropriate in certain cases, the information may also be provided to Business/Resource Unit and Group management.

WHAT KINDS OF ISSUES SHOULD I REPORT?

Contact the Integrity Line with questions or concerns in areas such as:

- Accounting, internal controls and audit issues
- Bribery, corruption and kickbacks
- Competition and antitrust law violations
- Discrimination or harassment
- EHS policy violations
- Human Rights violations
- Information Technology security threats
- Insider trading or disclosure of confidential information
- Intellectual property laws violations and unauthorized disclosure of intellectual information
- Misappropriation or misuse of corporate assets
- Physical safety risks
- Import/export law violations
- Trade embargo and sanctions violations
- Any other violation of law or company policy