

Code of Conduct and Ethics



Table of Contents

Values	3
Introduction	4
Message from the CEO	5
Speak Up	6
Act with Integrity	9
Anti-Corruption	10
Conflicts of Interest	12
Gifts, Hospitalitys, and Travel	13
Fair and Legal Competition	14
Money Laundering	15
Insider Trading	16
Financial Integrity	17
Company Assets	18
International Trade Compliance	20
External Communications	22
Responsible Political Activity	23
Government Requests and Investigations	24
Operate with Excellence	25
Secure Workplace	26
Drug and Alcohol Free Workplace	27
Quality	28
Customer Relationships	29
Supplier Relationships	30
Care for People	31
Harassment and Bullying Free Workplace	32
Personal Data Privacy	33
Human Rights	34
Inclusion and Diversity	35
Lead with Courage	37
Sustainability	38
Safety	38
Environment	39
Social Responsibility	40
Index	41



OUR PURPOSE

Turn **Raw Potential**
Into **Real Progress**

ALCOA'S VALUES

Act with **Integrity**

Operate with **Excellence**

Care for **People**

Lead with **Courage**



Introduction

The Code of Conduct

The Code of Conduct and Ethics (the “Code of Conduct” or the “Code”) sets forth the expectations for how we live our Values, conduct business, and interact with each other and our business partners. All of us are responsible for following the Code, all Company policies, procedures, and standards (referred to collectively herein as “policies”), and applicable laws and regulations, no matter where we are in the world. The Code applies to all employees, officers, and directors of Alcoa Corporation, its subsidiaries, and entities it controls. Only the Audit Committee of the Board of Directors can grant waivers from the provisions of the Code and such waivers applicable to directors and officers (including Alcoa’s principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions) will be disclosed promptly on the Company’s website, www.alcoa.com.

All employees, officers, and directors will be held accountable for their adherence to the Code, and violations of the Code will not be tolerated. Failure to observe the terms of the Code may result in disciplinary action, up to and including termination of employment. Violations of the Code may also constitute violations of law, and may result in civil and criminal penalties for the individual, their supervisor, and/or Alcoa.

If we encounter conflicts between our Code or policies and the law, or a resource function or operating location sets stricter guidelines than the Code, we follow the higher standard.

Alcoa’s high standards are a competitive advantage — they help us attract and retain customers, stockholders, and world-class employees.



Links:

[Ethics and Compliance](#)

[Corporate Policies and Procedures](#)



On the front cover

The picture on the cover is a sculpture, “Les visages du temps” (Faces of time), which is located next to the Baie-Comeau main entrance. It was commissioned in 2007 on the 50th anniversary of the Baie-Comeau smelter. The artist is Doris Clavette, a now retired employee of the Baie-Comeau, Canada smelter, and the sculpture pays tribute to past, present, and future employees who have contributed to this location’s success over the years. On the right of the monument is an aluminium book containing every employee’s name since 1957.

This is how Mr. Clavette describes his achievement:

“The many faces contained in this piece are an homage to the pioneers, the men and women who built the smelter, and a tribute to all those who continue to build it today and who will do so in the future. Everyone can see themselves in this sculpture and identify with it.

Of course, the 50 faces recall the plant’s 50-year history. The faces are also physically connected to each other to symbolize the teamwork of the men and women who work to continually improve the plant. Also, the two groups of faces are seen emerging from products cast at the plant itself, namely rolling ingots and T-ingots. Rods make the connections between the elements.

No matter where you stand around the sculpture, you can always see several faces joined and united. The dimensions of the faces become smaller and smaller to commemorate the pioneers who are gone but not forgotten. You can also see 25 faces in a vignette toward the bottom, a nod to the past, and 25 faces in a vignette towards the top, facing the future.

Through the positioning of the faces, I wanted to illustrate the pride of the people who work to make the plant progress. Finally, the 50 faces in the form of a sphere also symbolize the globe and eloquently convey that Alcoa is present everywhere on the planet.”

Message from the CEO

When we talk about our values at Alcoa, it is with an appreciation for the power in their simplicity. We act with integrity. We operate with excellence. We care for people. And we lead with courage. Our values define Alcoa and are central in our day-to-day decision-making. Our Code of Conduct is the compass that guides the way we work. It ensures there is no question about what is expected of us as Alcoans and how we conduct ourselves.

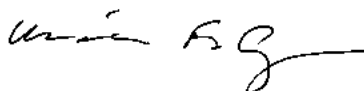
It is every employee's responsibility to work honestly, upholding our values and the Code. We do this by committing to doing the right thing, always aligned to our values, building trust with our customers, stockholders, communities and each other.

In addition to the Code of Conduct, our compliance program includes a well-resourced Integrity Help Chain to provide guidance if you are ever in doubt of an action, situation or decision. This Chain extends from your direct supervisor to the Executive Team, and includes our Integrity Champions, the Integrity Line, and subject matter experts throughout the Company. We do not tolerate retaliation under any circumstances against those who raise a concern or issue in good faith.

At Alcoa, it is our expectation that every employee is accountable for their behavior and our reputation for integrity. Alcoa is committed to being a workplace where everyone can work to their full potential.

Thank you for the work you do to uphold our values and ensure our success.

“We operate with **excellence**.
We care for **people**.”



Bill Oplinger
President &
Chief Executive Officer



Speak Up

It is up to each of us to live Alcoa's Values and create an open, honest, and ethical work environment where we all feel safe and respected. When we encounter a situation that violates our Values, Code, policies, laws, or regulations, we have an obligation to speak up and report the concern. Retaliation against those who raise a concern or issue in good faith is not tolerated.

Your responsibility

- Conduct yourself in a way that reflects our commitment to Alcoa's Values and to honest and ethical conduct.
- Know and follow the Code, applicable governmental laws, rules and regulations, and policies.
- Speak up if you have a question or concern. Each of us has the responsibility to promptly report any known or potential violation of our Code, policies, laws, or regulations.
- Promote a culture where all ideas and opinions are valued, and questions and concerns are heard and addressed.
- Participate cooperatively and honestly in the investigation process.

How to seek 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, Internal Audit, Global Security, Procurement)

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.

Facing an Ethical Dilemma

When you are faced with a situation that does not feel right, STOP and consider these questions:

- A**—Is the solution **Aligned** with our Code and Values?
- L**—Is it **Legal**?
- C**—Is it in **Compliance** with our policies and the Code of Conduct?
- O**—Are there **Others** I should consult before making a final decision?
- A**—Would I be **Ashamed** to tell my family, friends, colleagues, or boss about my action?

**If you are not sure,
STOP and SEEK ADVICE.**

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

- Need to report a violation of the Code, policies, laws, rules, or regulations.
- 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 listed above

An independent company receives all reported issues and concerns and promptly directs them to Alcoa's Ethics and Compliance Department for follow-up. All questions and concerns are handled professionally and in a confidential manner.

You may remain anonymous when using the Integrity Line as permitted by local law. Certain European countries limit the topics you can report and your ability to report anonymously and ask a question.

Employee participation, cooperation, and truthfulness in the investigation process is required.

What am I required to report?

All violations of the Code or policies must be reported. Some issues are so significant that they must be reported to the Chief Ethics and Compliance Officer and Integrity Line within 24 hours or as soon as reasonably possible. These issues include:

Corruption — Any allegation of improper payment or benefit to government officials.

Executive Misconduct — Any allegation that a senior executive has violated Alcoa's Code of Conduct.

Business Integrity — Any allegation of financial integrity violations, including any form of fraud, theft, control deficiencies, deception intended to result in financial or personal gain, weaknesses in internal controls that permit systemic violations or abuse, or involve an employee with responsibility for managing or executing internal controls.

Reputational Risk / Environment, Health, and Safety (EHS) / Improper Reporting — Any issue or allegation that could pose significant reputational risk to Alcoa, including major EHS incidents, improper recording or reporting of non-financial data, actual or threatened material litigation, and any significant compliance issues that may relate to an ongoing governmental investigation.

Information System / Personal Data Breach — Successful compromise of Alcoa

Retaliation

If an employee has raised a concern, any of the following actions by a supervisor or anyone else may be considered retaliation:

- Termination
- Demotion to a less desirable job, role, or shift
- Unsupported negative performance evaluations
- Increased surveillance
- Denying training or mentoring opportunities
- Exclusion from team activities or key business discussions
- Harassment
- Threats

Information & Manufacturing Automation Systems resulting in an actual or potential exfiltration of regulated or critical information and/or the successful establishment of external command and control capability; or confirmed personal data breach where a determination that reporting to a legal authority and/or notice to data subjects is required.

Refer to the Issue Reporting Policy or contact [Ethics and Compliance](#) with any questions.

Retaliation is not tolerated

Alcoa has a no-retaliation policy. No one can take action against you for asking a question or raising a concern in good faith. Managers are responsible for ensuring that their teams understand this policy and comply with it.



Q: A few months ago, I contacted the Integrity Line. I had found out that my supervisor had attempted to accept a kickback from a third party. There was an investigation, and I believe the company took some disciplinary action. Since then, my supervisor has stopped responding to my emails and has excluded me from team meetings. It is impacting my morale and my performance. Should I just keep quiet and hope that the situation improves?

A: No. The actions of your supervisor may be retaliation and should be investigated. Contact any of the help chain resources listed in the Code to report this issue.

If you feel that you or any of your colleagues are being retaliated against, report it immediately. Alcoa prohibits retaliation against an employee who in good faith reports potential wrongdoing to the Company, or who lawfully provides information to, responds to an inquiry from, or otherwise assists in an investigation by a government, law enforcement, or regulatory authority about a potential violation of law. 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.

Where to go for assistance

Policies and Procedures

Corporate policies and procedures are located on the [MyAlcoa Corporate Policies and Procedures portal page](#).

Integrity Help Chain Resources

For more information on the Code or our expectations, contact any of the following resources directly:

- Your supervisor or team leader
- Human Resources Department
- [Ethics and Compliance Organization](#)

Email: EthicsandCompliance@alcoa.com

Mail:

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

- [Legal Department](#)
- [Your Integrity Champion](#)
- [Integrity Line](#)
 - Website address: <https://secure.ethicspoint.com/domain/media/en/gui/29154/index.html>
 - Telephone numbers (please refer to the country-specific numbers below)
 - Note that certain European countries limit the topics you can report, your ability to report anonymously, and your ability to ask a question
- Subject matter experts (e.g., Corporate Finance, Internal Audit, Global Security, Procurement)

Integrity Line Telephone Numbers

Australia
1-800-00-2806

Brazil
0800-891-2552

Canada
English Speaking:
800-346-7319

French Speaking:
866-269-7644

China
400-601-5382

Hungary
068-098-2577

Iceland
800-8301

Italy
800-784-622

Netherlands
0800-022-4053

Norway
800-12-410

Saudi Arabia
800-844-0846

Spain
900-95-1247

Suriname
Step 1
dial 156
You will hear a recording,
"Please enter the number you are calling now."

Step 2
dial 866-269-7649

Switzerland
0800-56-4358

United States
1-800-346-7319



Links:

[Anti-Retaliation Policy](#)
[Integrity Line](#)
[Issue Reporting Policy](#)



Act with **Integrity**

Anti-Corruption

We compete on the merits of our products and services and do not tolerate any form of bribery or corruption — regardless of local practice or custom. While global business laws are complex and can change, remember, no matter where in the world you work, there is a law or policy prohibiting bribery that applies to you.

Your responsibility

- Follow the Alcoa Anti-Corruption Policy and procedures and all relevant anti-corruption laws including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, which apply to our activities worldwide.
- Understand how to recognize situations that can signal corrupt practices.
- Never offer or give a bribe, and never ask for or accept a bribe.
- Interact appropriately with government officials — bribery laws are often stricter when working with government officials.
- Follow Alcoa's Due Diligence and Contracting Procedure for Intermediaries when hiring others to act on Alcoa's behalf. All intermediaries must be approved, supervised, and follow Alcoa's Code of Conduct.
- Do not make facilitation or “grease” payments. These are small payments to government officials to encourage them to perform actions they are already required to perform, such as clearing goods through customs or issuing a permit. The sole exception is when you believe you are in imminent personal danger. In that case, do what is necessary to safely remove yourself from the situation and promptly report it to Alcoa's Legal Department.



What is a bribe?

A bribe is offering, giving, or receiving anything of value (no matter how small) in order to improperly influence a business decision and create an unfair business advantage. This may include:

- Cash, gift cards, or gift certificates
- Gifts, entertainment, and hospitality
- Payment of travel expenses—especially when there is no clear business purpose for the trip
- Loans
- Political contributions
- Favors, such as “putting in a good word” for a child’s private school application
- Offers of employment

Who is a government official?

We must never engage in any activity that could be interpreted as improperly influencing a government official. There are strict rules that apply to our dealings with government officials. Their status as government officials is not always obvious. “Government officials” include:

- Officials and employees at all levels of governments
- Military personnel
- Candidates for political office and political parties
- Employees of government-owned or controlled businesses, including our joint ventures
- Employees and officials of public international organizations
- Formal or informal leaders of Indigenous communities



Q: A government official invited me to a fundraiser for their favorite charity. The charity has a good mission, and I think a contribution would help our business relationship. May I buy a ticket and make a donation?

A: We must never provide an individual something of value to influence a business decision. While a charitable donation may not appear to benefit the official directly, it may benefit them indirectly, such as by raising their status in the community or improving chances for re-election. Because the rules about bribery of government officials are strict and difficult to navigate, contact Alcoa’s Legal Department or Ethics and Compliance for specific guidance.



Links:

[Anti-Corruption Policy](#)
[Charitable Contributions Procedure](#)
[Due Diligence and Contracting Procedure for Intermediaries](#)
[Gifts, Hospitalities, and Travel Procedure](#)

Conflicts of Interest

We share a responsibility to avoid conflicts of interest. A conflict of interest occurs when our private interests or actions interfere — or appear to interfere — with the interests of the company. We must always be transparent about outside activities and relationships. Many times, conflicts can be avoided or resolved through open and honest discussion. All directors, officers, and employees must ethically handle and, when possible, avoid potential, actual, or apparent conflicts of interest between personal and professional relationships that could — or appear to — influence their decisions.

Your responsibility

- Communicate potential conflicts of interest to your manager and Ethics and Compliance.
- Recognize situations and personal relationships that might make it hard for you to be objective.
- Refrain from holding outside employment or business dealings that could interfere with the performance of your job at Alcoa.
- Do not compete with Alcoa.
- Never seize a business opportunity that you learn about through your work at Alcoa.
- Never use Alcoa assets, proprietary information, or your position at Alcoa for personal gain.
- If at any time you think you may have a potential or actual conflict of interest, disclose it promptly to your manager, Alcoa's Legal Department, or Ethics and Compliance.



Q: My daughter works for Alcoa in another department. Could this be a conflict?

A: We have many situations where family members and others in close personal relationships work for Alcoa. Since every situation is unique, you should report the situation to your manager as well as Ethics and Compliance. In many cases there is no conflict of interest; however, it is important to be transparent about relationships.



Links:

[Conflicts of Interest Policy](#)
[Employee Service on Outside For-Profit Boards Procedure](#)

Gifts, Hospitalities, and Travel

Gifts, hospitalities, and travel can help build goodwill and strengthen a business relationship. These courtesies (such as goods, favors, benefits, honorariums, services, meals, recreations, entertainment, lodging, tickets, travel, offers of employment, etc.) are common and expected in many cultures. At the same time, they can create real or perceived concerns about personal integrity. It is important to avoid anything that creates an improper business advantage or even appears to influence someone's business judgment.

Your responsibility

- Follow our Gifts, Hospitalities, and Travel Procedure and always use good judgment.
- Know that gifts, hospitalities, and travel given to government officials require special approvals.
- Politely decline any gift, hospitality, or travel that does not comply with our policies and inform your manager.

What to think about when you want to offer or accept any gift, hospitality, or travel:

Proceed when:

- ✓ Legal and consistent with our Values, local customs, and the policies of all parties involved
- ✓ Given for a legitimate business purpose
- ✓ Reasonable, not lavish—and not provided on a regular basis
- ✓ Approved and documented accurately in our business records

Stop when:

- ✗ Presented with cash or a cash equivalent, such as a gift card or gift certificate
- ✗ Offered or received for the purpose of influencing a business outcome
- ✗ An embarrassment to you, Alcoa, or anyone else
- ✗ A governmental official is involved. Ensure the appropriate approval process has been followed per the Gifts, Hospitalities, and Travel Procedure



Q: A vendor has invited me to an information seminar about a new product, followed by dinner and a hockey game. Should I go?

A: It may be appropriate to attend the seminar, but discuss all aspects of the invitation with your manager or Ethics and Compliance to determine if it is reasonable, has a business purpose, and there is no real or perceived conflict of interest. Remember, if the vendor is currently competing for Alcoa business, then it is not appropriate to accept gifts, hospitalities, or entertainment while the decision is pending.



Links:
[Anti-Corruption Policy](#)
[Gifts, Hospitalities, and Travel Procedure](#)

Fair and Legal Competition

Fair and open competition benefits Alcoa, our customers, and communities. We compete for business aggressively, honestly, and solely on the merits of our products and services. Competition and antitrust laws are complex, and failure to follow them can have serious consequences for Alcoa as well as the individuals involved.

Your responsibility

- Understand how competition laws apply to your job activities and seek guidance from Alcoa's Legal Department when you have questions.
- Obtain approval from your manager before you meet with competitors. This applies to professional associations, industry and supplier conferences, training, joint ventures, and technical committees.
- Never communicate with a competitor about:
 - Prices or matters affecting price, such as payment terms or other contract terms
 - Customers or potential customers
 - Labor negotiations
 - Production or inventory levels
 - Market outlook, including views on supply and demand
 - Bids or our bidding process
 - Dividing production, sales territory, products, customers, or suppliers
- Do not engage in deception or espionage to get information about our competitors.



Q: I would like to attend an industry trade association meeting. I know competitors will be there. Is there anything I need to look out for?

A: First discuss the meeting with your manager. You and your manager must weigh the value of attending against the risks associated with the expected contact with competitors. Be careful in all of your contacts at the meeting, even social events and casual conversations. Never discuss prices, costs, sales, profits, production levels, or other competitive subjects. If they come up, stop the conversation and make it clear to all present that the topic is off limits. Leave and contact Alcoa's Legal Department.



Links:
[Compliance with Competition Laws Policy](#)

Money Laundering

We comply with money laundering laws worldwide. Money laundering occurs when companies or individuals attempt to conceal or disguise the proceeds of unlawful activity by moving them in a manner that hides their source and makes them look legitimate. All of our operations must safeguard against the use of such funds to pay for Alcoa goods and services.

Your responsibility

- When making payments to or accepting funds from third parties, follow Alcoa's financial policies and procedures.
- Contact Alcoa's Legal Department if you suspect any improper activity.



Money Laundering

Remain alert to situations that look suspicious or may indicate that someone is using or wants to use their transactions with Alcoa for money laundering, such as:

- Payments requested in cash or cash equivalents
- Payments made by a third party for the benefit of a customer
- Payments made in currencies other than those specified in the contract
- Payments made from an unusual, nonbusiness account
- Unusual transfers to or from countries not related to the transaction
- Customers who are reluctant to provide information about their ownership or seem eager to avoid our recordkeeping requirements

Notify Alcoa's Legal Department immediately if you encounter any of these situations.



Links:
[Anti-Corruption Policy](#)

Insider Trading

Although Alcoa may share information with certain employees to allow them to perform their jobs, we are not always ready to release that information to the public. If you become aware of information that would be likely to affect the price of Alcoa's stock or other securities once it becomes known to the public, you are in possession of material non-public information. Trading on material non-public information, and passing material non-public information to others, violates Alcoa policy and may be illegal.

Your responsibility

- When you are an insider (an employee is an insider) who has material non-public information, do not buy or sell Alcoa's securities until the information has been publicly released by Alcoa.
- Never trade in the securities of any other company based on material non-public information about that company that was obtained through your work at Alcoa until it has been released to the public.
- Do not share material non-public information with anyone else, including colleagues, family members, or friends who do not need to know the information as part of their work for Alcoa.
- Follow all blackout restrictions and guidelines that apply to your trades in Alcoa securities.
- Consult with your supervisor or Alcoa's Legal Department if you have any questions.



Q: I want to buy Alcoa stock under an Alcoa savings or other benefit plan. Do the insider trading rules apply?

A: Yes. You need to be alert to the insider trading rules whenever you buy or sell Alcoa securities. You can elect to enroll in, transfer money into or out of, or adjust your ongoing contribution amount into the Alcoa stock fund in an Alcoa savings plan or other benefit plan only when you do not have material non-public information and there are no blackout restrictions.



Links:
[Insider Trading Policy](#)

Financial Integrity

Alcoa's books, records, and accounts must accurately and fairly reflect all transactions and activities in accordance with applicable laws, regulations, and standards, and Alcoa's policies and Financial Management Handbook. While members of our finance team have specific responsibilities, we are all accountable for the process of recording operational results and maintaining associated records.

Your responsibility

- Ensure that all information and business records that you prepare, process, or approve are accurate, complete, and comply with applicable laws, standards, and procedures.
- Never take any action, directly or indirectly, to coerce, manipulate, mislead, or fraudulently influence Alcoa's independent public accountant engaged in the performance of an audit or review of the financial statements of the company.
- Preserve all documentation and evidence that supports the true nature of a transaction.
- Perform all internal controls and procedures, even if you think it would be harmless or save time if they were bypassed.
- Always cooperate with Alcoa's internal and external auditors and be open and honest with them.
- Never hide or destroy records to avoid disclosure in legal or government proceedings.
- Be familiar with our record management policies and retention schedules that apply to records and information in any format, including electronic and paper copies.
- Follow instructions that you receive from Alcoa's Legal Department to retain documents, such as required holds in ongoing or anticipated litigation and government investigations or audits.
- Keep accurate books and records of Alcoa business transactions according to laws, regulations, and standards, and Alcoa's policies and Financial Management Handbook.

What is a business record?

Any information or document that supports a business transaction is a business record. Alcoa's financial ledgers are one type of business record, but so are:

- Invoices
- Expense reports
- Time records
- Email and voicemail communications
- Manufacturing reports and test results
- Safety records



Q: My manager asked me to ship an order earlier than the customer's requested shipment date. They indicated that this would enable us to meet our sales goal for the quarter. Is it ok to proceed with the shipment?

A: No. We cannot recognize sales for goods shipped before the customer's requested shipment date. To change a shipment date, we must first obtain the customer's written permission. If your manager still insists you process the shipment, do not proceed and immediately contact one of the help chain resources listed in the Code.



Links:

[Anti-Corruption Policy](#)
[Financial Fraud Reporting Procedure](#)
[Financial Management Handbook](#)
[Records Management Policy](#)

Company Assets

Each of us is responsible for safeguarding Alcoa's assets, including Alcoa's confidential or proprietary information and intellectual property, as well as the property and resources entrusted to us by our business partners. Responsible use of Alcoa assets enables us to transform ideas into value compete effectively and maintain the trust of our stakeholders.

Your responsibility

- Keep confidential information confidential, unless otherwise authorized or disclosure is legally required.
- Protect all assets against theft, loss, damage, or misuse.
- When traveling, do not take Alcoa confidential information or devices into countries where the risk of data theft is high without appropriate written permission. Prior to traveling internationally, each Alcoa employee is responsible to confirm that their destination country does not appear on the list of countries with high data theft risk on Global Security. If the destination is listed as high risk, the employee should contact alcoaglobalsecurity@alcoa.com prior to departure.
- Do not use assets for your personal benefit, or for the benefit of others, without appropriate written permission.
- Ensure that assets are never used for illegal purposes.
- Label, classify, secure, handle, and dispose of assets, including confidential information, properly.
- Remember that your confidentiality obligations continue after you leave Alcoa; all Alcoa information (whether in electronic or paper format) must be returned before you leave whether that information is stored on an Alcoa device or elsewhere (including a personal device or email account).
- Understand that information on Alcoa devices, including emails, is Alcoa property and will not be treated as private communications, except as required by law.
- Never ask new employees to provide confidential information from their previous place of work.
- Contact Alcoa's Legal Department with any questions or concerns.

What is confidential or proprietary information?

It is non-public information that might benefit competitors or otherwise hurt Alcoa if disclosed. Here are some examples:

- Information about our manufacturing processes, research, and technical data
- Commercial information such as customer information, pricing, marketing plans
- Actual and proposed business plans and strategies, including product development
- Financial data
- Information related to employees
- A third party's proprietary information that Alcoa has agreed to keep confidential

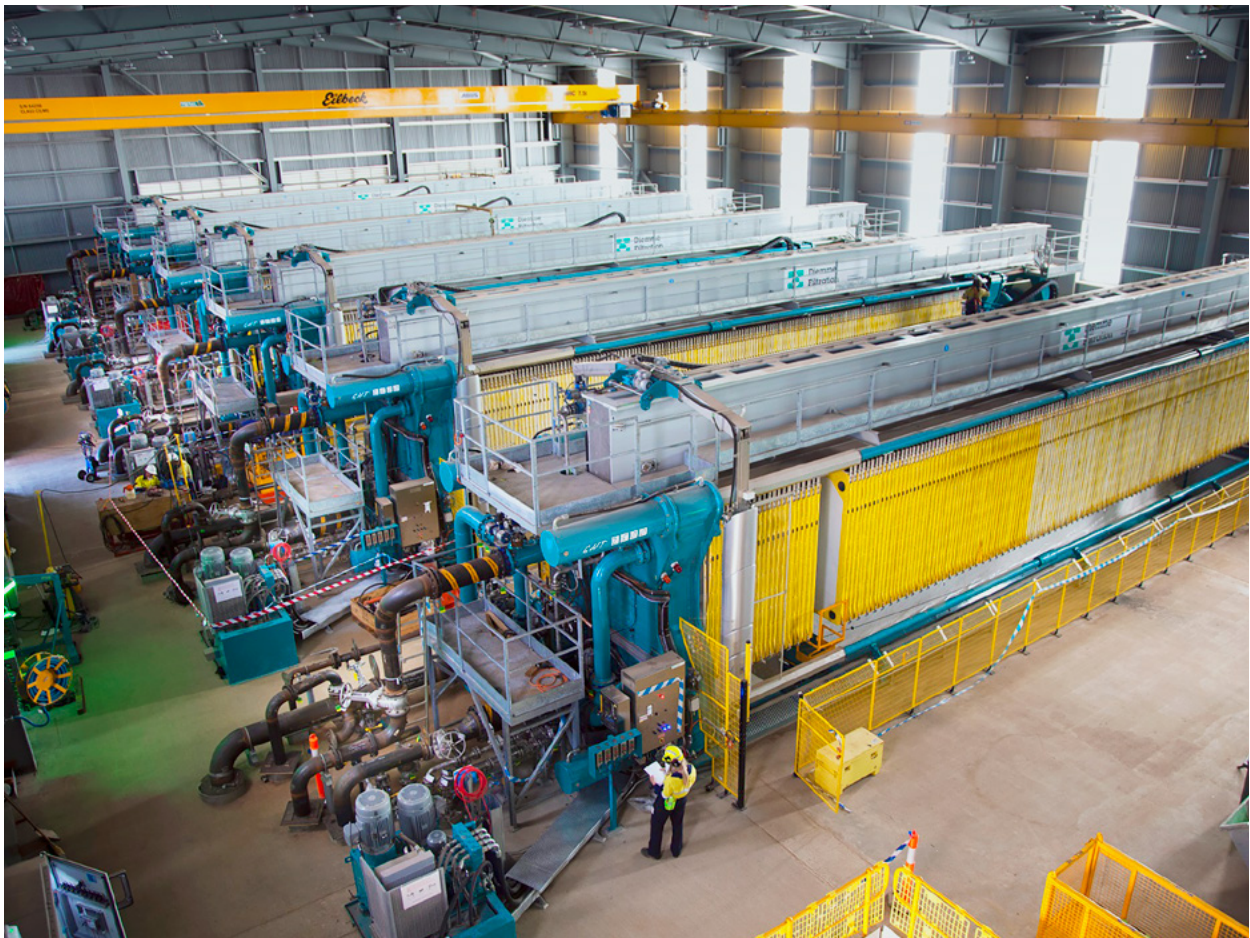
Some rules of the road when asked to supply information:

Proceed and share it when you are certain:

- ✓ The information is not confidential, sensitive, or proprietary, and your Alcoa colleague needs the information to perform their job
- ✓ Your manager has authorized you to share the confidential information and any required confidentiality agreements are in place

Stop and ask for guidance when:

- ✗ You do not know whether the information is confidential, sensitive, or proprietary
- ✗ The information is labeled or classified as confidential



Links:

[Acceptable Computer Use Policy](#)
[Data Privacy Policy](#)
[Trade Secret Procedure](#)
[Trademark Procedure](#)

International Trade Compliance

As a global importer and exporter of goods, Alcoa must follow complex trade regulations that vary by country. Non-compliance with applicable regulations can result in significant penalties and business disruption. Alcoa employees who are involved in import and export transactions have a responsibility to ensure Alcoa's compliance with all U.S. and international laws, regulations, and Alcoa policies relating to the import and export of Alcoa goods, technologies, and services. In all cases, we must accurately and openly report our importing and exporting activities.

Your responsibility

- Stay current on trade compliance laws and regulations, keeping in mind that the rules are complex and can change.
- Obtain required licenses and approvals before exporting or importing products, technology, or services.
- Know and follow the current restrictions on:
 - Trade and financial dealings with specific countries, individuals, groups, and organizations.
 - Sales of certain products, technologies, and/or services, which can depend on their intended use and intended users.
 - Rules of engagement regarding business activities between U.S. and non-U.S. persons, both in the United States and abroad.
 - Understand U.S. anti-boycott laws and regulations that prohibit that prohibit participation in boycotts not condoned or authorized by the United States. Contact the [Trade Compliance Department](#) if you receive any communication or other document with a request for information about a boycotted country or company.
 - Protect the security of our products, from the time a product is ready for shipment through the transportation chain, until it arrives at its intended destination.

What is an export?

Shipping a product across national borders is an export that may be subject to licensing and approval requirements and trade restrictions. Exports can also include:

- Emailing information or technology across national borders — even to another Alcoa or a coworker at your plant who is traveling in another country.
- Sharing technical information in your office with anyone who is not a citizen or a permanent resident alien in your own country (a “deemed export”).
- Traveling outside the U.S. with products or technology — including laptops and their content such as operating software and technical data.
- Giving access to export-controlled technology to anyone who is not a citizen or a permanent resident alien in your country, including posting information on a website.



Q: I work in research and development and have export controlled information on the laptop I use when I travel for business. What precautions should I take?

A: Keep your laptop with you and secure at all times. When traveling to another country, check with our Trade Compliance Department. Remember, you cannot export restricted technology without the proper government export licenses and other government approvals. Export controlled information (Controlled Technology) includes, anything related to export controlled products, processes, equipment, or software and may include drawings, reports, presentations, photographs, specifications, etc.



Links:
[International Trade Compliance Policy](#)

External Communications

As a public company, Alcoa is subject to rules and guidelines concerning the public disclosure of information. We communicate appropriately with stockholders, securities analysts, and the media, among others, avoiding selective disclosures that could give any parties an unfair advantage. Only designated individuals are authorized to speak on Alcoa's behalf.

Your responsibility

- Ensure all reports and documents filed with the Securities and Exchange Commission or any other governmental agency, as well as all other public disclosures and communications, contain full, fair, accurate, timely, and understandable disclosures.
- Refer media requests and questions from investors or the financial community to an appropriate Corporate Communication or Investors Relations representative.
- Avoid making statements in which you are, or that may make it appear that you are, speaking on Alcoa's behalf.
- Before agreeing to participate in a trade conference, make a presentation, or contribute comments for published articles, obtain approval from your manager, Corporate Communications, and in some cases, Alcoa's Legal Department, per the External Communications Procedure.

Using Social Media Responsibly

Alcoans are expected to use common sense and abide by Alcoa's Values when using social media. This applies to posts about Alcoa business, people, markets, customers, suppliers, partners, or activities. Follow these guidelines:

- Read and follow Alcoa's Social Media Policy.
- Remember that our Social Media Policy applies whether you are using Alcoa's accounts and equipment or your own.
- Understand that privacy does not truly exist in the world of social media — posts can be copied, printed, forwarded, or archived.
- Report any online post or activity relating to Alcoa that you believe is improper or not in accordance with our Values and/or policies.



Q: Last night, I saw inaccurate information about Alcoa's plans and prospects in postings on the web. Can I respond and correct the record?

A: No. You should not respond unless you have been explicitly authorized to speak on Alcoa's behalf. Instead, bring the posting to the attention of your manager, Corporate Communications, or Alcoa's Legal Department.



Links:
[External Communications Procedure](#)
[Finance Communications Policy](#)
[Social Media Policy](#)

Responsible Political Activity

Alcoa respects the rights of our employees and others to participate in political activities and encourages civic engagement. We are a diverse company, and respect for this diversity in all its forms, including the political opinions of others, is essential to our success. We are committed to complying fully with all rules that apply to our participation in political activities.

Your responsibility

- Alcoa does not typically make contributions to political parties, officials holding public office, or individuals seeking public office, or for ballot measures, or referenda. In the event that contributions are made, our policies must be followed to ensure compliance with all laws.
- Keep in mind that cash and cash equivalents are not the only forms of contribution. Other types include allowing Alcoa's assets or facilities to be used for the benefit of any individual holding, or seeking public office, or for any political party, or an employee performing any service for an individual, or political party during Alcoa work time.
- Consult with Alcoa's Government Affairs Department before you communicate with government or political party officials, employees, or officeholders.
- Ensure that any lobbying activities conducted on behalf of Alcoa have been approved by Alcoa's Government Affairs Department and comply with all applicable laws and reporting requirements.



Avoid making these mistakes...

- Using company time or resources (i.e., cash, assets, and facilities) in support of personal political activities
- Pressuring other Alcoans to support your political views
- Using your position at Alcoa to try to improperly influence suppliers, customers, or other business partners to support your political views
- Representing that Alcoa shares your personal political opinions
- Engaging in lobbying activities or public policy issues on Alcoa's behalf without advance approval from Government Affairs



Links:

[Contacts with Governments Policy](#)
[Engaging Third Party Lobbyists and Grassroots Lobbying Procedure](#)
[Political Contributions Policy](#)

Government Requests and Investigations

Alcoa cooperates fully with appropriately authorized government requests and investigations.

Your responsibility

- Contact Alcoa's Legal Department immediately to discuss the appropriate handling of government investigations and visits as well as all government requests for Alcoa records (other than routine requests that are a normal part of your job).
- Always provide accurate and truthful information in response to government requests.
- Never alter, withhold, or destroy records related to a government investigation.



A large industrial facility, likely a steel mill, with a robotic arm positioned over a glowing orange molten metal bath. The scene is dimly lit with blue and yellow tones. In the background, a yellow sign with the text "B 049" is visible.

Operate with **Excellence**

Secure Workplace

Our focus on safety includes a commitment to maintaining a secure work environment. Every Alcoa plays an important role in actively supporting a workplace that is free of violence, threats, and intimidation.

Your responsibility

- Follow all building security rules for your site.
- Never bring a weapon to work. Weapons include, but are not limited to, firearms (guns), swords, explosives, and any other item whose purpose or use is to cause harm.
- Never do or say anything that could cause someone to feel threatened or unsafe.
- Report any suspicious persons, threats of violence, presence of weapons, or any concern you may have for your personal safety to your supervisor, Human Resources, local security, or the [Integrity Line](#) as soon as possible.
- In emergencies, follow local emergency reporting procedures or contact the authorities.



Links:
[Global Security Policy](#)



Drug and Alcohol Free Workplace

Our work requires alertness, accuracy, and quick reflexes. Alcoaans are expected to perform their duties free from the influence of drugs and alcohol that can adversely affect safety, productivity, and judgment and can cause serious accidents. Illegal drugs, controlled substances, and misused over-the-counter or prescription medications have no place in our workplace.

Your responsibility

- Report to work free from the influence of drugs and alcohol.
- Do not bring these substances to work, use them at work, or give them to others.
- Notify your supervisor if you are taking medication that may affect your work.
- Report it immediately if you believe a colleague is working while impaired.
- Seek assistance through your location's Employee Assistance, Family Support, and Counseling Program if you have a drug or alcohol problem.



Quality

The quality of products and services we provide to our customers is critical to our continued success and sustaining profitable growth. Focusing on quality means meeting our customers' requirements and delivering products and services at the right quality levels, on time, and at the agreed-upon cost.

Your responsibility

- Expect the same behavior from our suppliers that our customers expect from us.
- Comply with all quality control standards, customer requirements, and product testing procedures.
- Speak up if you discover an actual or potential product quality or safety issue. "See something, say something."
- Refrain from changing products, parts, or service specifications, unless authorized by the customer and permitted by applicable regulations or commercial practices.



Q: We are going to miss the promised shipment date for an order of aluminum slab because final product testing will not be completed in time. The customer has approved shipment of orders under these circumstances before. Can we ship this order without all the testing completed?

A: No. The sales contract with the customer requires that the product fully conform to all negotiated product specifications prior to being shipped. Documented customer approval must be obtained to ship product that is known to be nonconforming or for which required product testing is not complete.



Links:
[Quality Policy](#)

Customer Relationships

We value our customers and treat them fairly. Our goal is to build honest and transparent relationships based on mutual trust. By finding ways to create value for our customers, when they win, we win.

Your responsibility

- Honor our commitments and contractual obligations.
- Listen to our customers and consider their points of view when making decisions.
- Communicate honestly about our products, services, and prices.
- Strive to anticipate, respond to, meet, or exceed our customers' expectations.



Supplier Relationships

Our supplier relationships are based on lawful, honest, and fair practices. While we recognize and respect the different legal and cultural environments in which our suppliers operate, we only partner with suppliers who follow ethical, lawful, and sustainable practices wherever they are located.

Your responsibility

- Seek the best value proposition for Alcoa, considering environmental, social (including Human Rights), governance, and economic impacts when buying goods and services.
 - Undertake applicable due diligence of suppliers as part of the supplier selection process.
 - Use Alcoa-approved suppliers with existing leveraged agreements when possible.
 - Obtain competitive bids and negotiate in good faith, free of any conflicts of interest when selecting suppliers and awarding work.
 - Do not accept, offer, or pay bribes and favors.
 - Make payments to the person or company that actually provides the goods or services, in a country that is related to the transaction.
 - Keep supplier information (such as pricing, intellectual property, competitive advantage) confidential and do not share it with other suppliers, competitors, or third parties (unless authorized) for any reason.
- Contact SupplierSustainability@alcoa.com or the Integrity Line if you suspect that a supplier is not complying with our standards.

Supplier Standards

We do business only with suppliers that comply with applicable laws and never knowingly use a supplier that:

- Supplies unsafe products or services
- Uses child labor or forced labor
- Uses physical punishment to discipline employees, even if it is allowed by local law
- Does not operate in full compliance with the law and in an environmentally responsible manner



Q: I am in charge of purchasing a product for Alcoa. After a competitive bid, Supplier A looks to be the best choice based on price, quality, terms, and performance. However, my manager has instructed me to contract with Supplier B, who bid at a higher price and on less favorable contract terms. My manager said that one of their family members works at Supplier B and they would like to have Alcoa's business. What should I do?

A: You are responsible for seeking the best quality, price, and performance proposition for Alcoa based on objective criteria per the Conflict of Interest Policy. If you feel uncomfortable discussing your concerns with your supervisor, contact any of the help chain resources listed in the Code.



Links:
[Global Procurement Procedures Manual](#)
[Supplier Standards](#)



Care for **People**

Harassment and Bullying Free Workplace

We expect our workplaces to be free from harassment, bullying, offensive, or disrespectful conduct. Harassment and bullying are not tolerated within Alcoa. Unacceptable behaviors include unwelcome verbal, visual, physical, or other conduct that creates an intimidating, humiliating, offensive, or hostile work environment. It is important to remember that harassment is determined by the impact actions have on others. We all deserve dignity and respect.

Your responsibility

- Treat others fairly and with respect.
- Speak up if you see someone being treated unfairly or disrespectfully.
- Avoid actions that someone might consider bullying or harassment.
- If you are responsible for hiring, firing, pay decisions, promotions, or employee discipline, focus solely on the person's qualifications, abilities, experience, and performance.

What is harassment?

Harassment is an unacceptable, hostile, or offensive action directed against anyone and includes:

- Making inappropriate jokes or comments — what you find to be funny may be offensive to others
- Teasing a colleague about their race, color, religion, national origin, disability, sexual orientation, gender identity / expression, veteran status, genetic information, sex, or age
- Bullying
- Sharing unsolicited opinions about a person's sexual orientation or gender identity/expression
- Making sexual advances or requests or sharing sexually explicit or other inappropriate materials



Q: A colleague made offensive jokes at an offsite dinner with a customer. Does the Code apply?

A: Yes. It applies to our work wherever we are. That includes what we do on Alcoa property and at offsite meetings, business travel, and business-related social activities.



Links:
[Harassment and Bullying Free Workplace Policy](#)

Personal Data Privacy

We all have a responsibility to protect the personal information of our colleagues, customers, suppliers, and others with whom we do business. Even within Alcoa, personal information should be shared only with those who need it to perform their job. Adequate safeguards should be put in place to ensure the information is not disclosed to anyone else.

Our responsibility

- Understand and follow all applicable laws, policies, and procedures when working with personal information. This includes how it is collected, used, stored, shared, and deleted.
- Only use and request the minimum required personal data if it's absolutely necessary and only process the personal data collected for its intended purpose. Avoid collecting personal data more than once and retain data as is specified in the Alcoa Record Retention Schedule.
- If you become aware of a security incident leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data, promptly report it to AlcoaDPO@alcoa.com.
- Alcoaans who purposely disclose or misuse personal information will be held responsible and may face disciplinary action and civil and criminal penalties.

What is personal data?

Personal data is any information about a data subject who is an identifiable person. Personal data can be in electronic or paper form. Some examples at Alcoa of personal data are:

- Name, date of birth, and social security or other identity card number
- Contact information such as mailing address, email address, and phone numbers
- Health or medical information
- Information contained in employee files, including employment history, and evaluations
- Information collected during the application and hiring process
- Information related to employee benefits, such as the names of dependents, beneficiaries, and insurance policy information
- Alcoa leadership names and information on website, such as business phone number, business email, picture, and business location
- Email headers, to/from
- Employee phone or voicemail directory



Q: An employee is compiling a list of employees within their department who will be visiting an Alcoa plant the next day. They sent emails to the employees to request their full names, office locations, and the names of their supervisors to create visitor badges. Additionally, the employee thinks that it would be a good idea to gather the employees' home addresses in case they might be needed in the future. Should the employee collect additional information (home address) from the employees?

A: No, since the data is not necessary for the specified purpose of collecting the data.



Links:

[Data Privacy Policy](#)
[Data Privacy Standard](#)

Human Rights

Alcoa acknowledges its responsibility to respect human rights. Our policies set forth our expectations for employees and suppliers as well as our commitment to the United Nations Guiding Principles for Business and Human Rights and the core conventions of the International Labor Organization.

Your responsibility

- Never use child labor or forced labor in our business activities.
- Contact the Integrity Line if you suspect that an Alcoa supplier or other business partner is using child labor or forced labor in their activities.
- Respect the freedom of individual employees to join, or refrain from joining, legally authorized associations or organizations.
- Engage honestly and responsibly in dealing with the communities, including Indigenous and Land-Connected Peoples, where we operate, explore, and actively manage closed sites.
- Never compromise health or safety for profit or production.
- Treat others fairly and equally in all employment-related decisions and promote a work environment free from harassment and bullying.
- Ensure security operations are conducted in accordance with human rights principles.

Alcoa is a participant in the United Nations Global Compact, a strategic policy initiative for businesses that are committed to aligning their operations and strategies with universally accepted principles in the areas of human rights, labor, environment, and anti-corruption.



Links:

[Human Rights Policy](#)

[Indigenous Peoples Policy](#)

Inclusion and Diversity

Alcoa's vision is to provide trusting workplaces that are safe, respectful, and inclusive of all individuals and reflect the diversity of the communities in which we operate. Building a talented and diverse workforce strengthens our company and its competitive advantage. Each of us plays an important role in creating an open and inclusive workplace where every individual is able to freely contribute to Alcoa's success. At Alcoa, we embrace our colleagues' varied backgrounds, cultures, and perspectives while valuing our differences.

Our responsibility

- Change one's own behavior to foster the inclusion of different backgrounds and perspectives.
- Actively champion people different from ourselves.
- Treat others fairly and equally in all employment-related decisions.
- Acknowledge the influence of different cultures on values and behaviors.
- Take actions to prevent bias from influencing your behavior.
- Speak up if you see instances of discrimination or other non-inclusive behavior.

Be an ally for inclusion and diversity

What is an ally?

An ally is someone who actively supports, promotes, and aspires to advance the culture of inclusion through intentional, positive, and conscious efforts that benefit groups different than their own. Everyone has the ability to be an ally.

How to be an ally

- Speak up for others when you observe bias, harassment, or discriminatory behavior or comments.
- Collaborate by actively seeking out others with different backgrounds or experiences, especially when solving problems.
- Reach out to others by inviting people you don't normally interact with to lunch or have coffee. You can do this in-person or virtually. Take this opportunity to listen and learn about other colleagues — their hobbies, interests, and backgrounds.
- Use inclusive language — be aware of gendered terms and use language that embraces all types of people.



Links:
[Equal Employment Opportunity Policy](#)



Lead with **Courage**



Sustainability

Advancing sustainability is a strategic priority for our company. Each of us is responsible for operating safely at all times, protecting the environment, and promoting social responsibility.

Safety

Because we value human life above all else, we are committed to working safely and promoting wellness. We have a shared accountability for protecting ourselves and our colleagues by performing our jobs in a safe and responsible manner. No matter where you work or what your job is, put safety first. We continually strive to reduce the risk of illnesses and injuries each year and will not compromise our EHS commitment.

Your responsibility

- Never deviate from the safe and proven method for performing a task. If you are unsure, do not proceed — stop and seek help.
- Promptly report all safety-related concerns, deviations, and incidents even if no one was injured.
- Practice these six safety fundamentals every day:
 1. Follow safe work practices and proactively seek to improve them.
 2. Understand the critical risks of your task and the critical controls required to mitigate the risks.
 3. Before you start work, make sure all safeguards are in place.
 4. Adhere to all work design plans, permits, and safety operating limits.
 5. Keep our work environment clean, orderly, and safe.
 6. Stop work, or stop others, and seek help when you recognize an at-risk situation or the job task cannot be done according to plan and procedures.



Q: I work in a plant. One of my colleagues does not always follow the energy isolation (lock-tag-verify) procedure before starting a task. Should I say something?

A: Yes. The procedure is in place to prevent hazardous energy from fatally or seriously injuring someone. By not following the procedure, your colleague puts themselves and potentially others at risk of a life-threatening injury. Speak up, stop work, and seek help.



Links:
[EHS Standards](#)
[EHS Vision Values Mission and Policy](#)

Environment

Alcoa is committed to operating in a way that respects and protects the environment wherever we are located. We will not compromise our environmental commitment for profit or production. We respond truthfully and responsibly to questions and concerns about our environmental actions and the impact of our operations on the environment.

Your responsibility

- Comply with all applicable laws, policies, and environmental standards.
- Understand your role in ensuring compliance with our license(s) to operate.
- Help identify ways to reduce our environmental footprint and continue to improve our environmental performance.



Q: My supervisor asked me to follow a new waste disposal procedure, but I am not sure it is safe or even legal. What should I do?

A: Never guess when you are dealing with environmental procedures. Check with your supervisor to make sure you understand the request. If you still have concerns, contact local management, EHS, or any of the help chain resources listed in the Code.



Links:

[Biodiversity Policy](#)
[Climate Change Policy](#)
[EHS Standards](#)
[EHS Vision Values Mission and Policy](#)
[Water Stewardship Policy](#)

Social Responsibility

Our business activities have an impact on our employees, as well as on the communities and ecosystems in which we operate. We must continually earn our right to operate by demonstrating our respect for the wellbeing of our communities, the environment, and human rights. We understand the importance of having transparent and open dialogue with our stakeholders, in particular, our hosting communities, and we work to build a culture of trust.

Your responsibility

- Respect the local norms and customs of the communities where we operate.
- Strive to improve the quality of life and exercise care for the environment in all community dealings.
- Engage with local stakeholders to ensure that we:
 - Understand all stakeholders' issues and concerns
 - Provide them with relevant information
- Minimize impacts to stakeholders
- Align partnerships with community priorities.
- Contact Alcoa Foundation for guidance on how your business or function can support worthy projects in our communities.



Links:

[Human Rights Policy](#)

[Indigenous Peoples Policy](#)

[Social Policy](#)



The image shows a close-up, slightly angled view of several large coils of aluminum sheet metal stacked on top of each other. The coils are wrapped in a translucent, protective material, likely plastic, which shows some condensation or moisture on its surface. Each coil is secured with a green plastic strap. The ends of the coils are visible, showing the circular shape of the rolled material. The word "Index" is printed in a white, sans-serif font, centered over the middle of the stack. The lighting is even, highlighting the metallic texture and the protective wrapping.

Index

Index

A

Alcohol	2, 27
Antitrust	2, 14
Assets	2, 12, 18, 23
Assistance	5, 6, 8, 27

B

Books and records	42
Boycotts	20
Bullying	2, 32, 34

C

Child labor	30, 34
Competition/Competitors	42
Computers	42
Confidential information	18, 19
Conflict of interest	12, 30
Corruption	2, 7, 10, 11, 13, 15, 17, 34
Customers	4, 5, 14, 15, 22, 23, 28, 29, 33

D

Data privacy	2, 19, 33
Discipline	30, 32
Diversity	2, 23, 35
Drugs	27

E

Email	7, 8, 17, 18, 20, 33
Entertainment	11, 13
Environment/EHS	42
Ethical dilemma	6
Export	20, 21

F

Facilitation payments	42
Financial data	7, 18
Financial management handbook	17
Forced labor	30, 34
Foreign Corrupt Practices Act	10

G

Gifts	2, 10, 11, 13
Government contracts	42
Government officials	7, 10, 11, 13
Government requests and investigations	2, 24
Grease payments	2, 24

H

Harassment	2, 5, 7, 11, 32, 34, 35
Health	33, 34, 38
Hospitality	11, 13
Human rights	2, 34, 40

I

Import	20
Inclusion	2, 35
Insider trading	2, 16
Integrity Help Chain	5, 8
Integrity Line	5, 6, 7, 8, 28, 30, 34
Intellectual property	18, 30
Intermediaries	10, 11
International trade	2, 20, 21

Index

M

Material non-public information	16
Media requests and publications	43
Medication	27
Money laundering	2, 15

O

Outside employment	12
--------------------	----

P

Personal information	33
Political activities and contributions	43
Privacy	2, 19, 22, 33
Procurement	5, 6, 8, 30
Public communications	43

Q

Quality	28, 30, 40
---------	------------

R

Records	13, 17, 24
Reporting concerns	43
Respect	23, 30, 32, 34, 39, 40
Retaliation	5, 6, 7, 8, 11

S

Safety	2, 17, 26, 27, 28, 34, 38
Security	5, 6, 8, 20, 26, 33, 34
Social media	22
Social responsibility	2, 38, 40
Supervisor	4, 5, 6, 7, 8, 11, 16, 26, 27, 30, 33, 39
Suppliers	14, 22, 23, 28, 30, 33, 34
Sustainability	2, 30

T

Trade associations and conferences	43
Trade compliance	2, 20, 21
Trademarks	43

U

UK Bribery Act	10
----------------	----

V

Violence	26
----------	----

W

Weapons	26
Wellness	38



Alcoa

©2024 Alcoa. All rights reserved.