



HUMAN RIGHTS 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 Corporation ("Alcoa") acknowledges its responsibility to respect human rights. It is fundamental to the sustainability of our Company and the communities in which we operate. In our Company and across our organization, we are committed to ensuring that people are treated with dignity and respect.

Our Values (Act with Integrity, Operate with Excellence and Care for People) provide the common framework for our decisions, actions and behaviors. They are our universal language – transcending culture, and geography. Living our values requires us to meet the highest standards of corporate behavior in all aspects of business – in all regions of the world.

Alcoa's Human Rights Policy is committed to abiding by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

Alcoa complies with applicable international and local legal requirements in the countries in which we operate. Where local law conflicts with the principles contained in this Human Rights Policy, Alcoa complies with local requirements while, at the same time, seeking ways to uphold the principles set forth in this Human Rights Policy.

PRINCIPLES

Health and Safety

We operate globally in a safe, responsible manner respecting the health of our employees, our customers, suppliers, contractors, and the communities in which we operate. The Company provides a safe and healthy workplace, complies with applicable safety and health laws, regulations and internal requirements. The Company will not compromise any health or safety requirements for profit or production.

Forced Labor, Human Trafficking, and Working Time

We believe that people should work because they want or need to, not because they are forced to do so. Alcoa prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, slave labor and any form of human trafficking. Alcoa's working time practices comply with national law and applicable collective agreements.

Trusting Workplace and Equal Opportunity

We seek to provide a trusting workplace that is safe, respectful and inclusive of all individuals and that is free from harassment, bullying, offensive or disrespectful conduct. Alcoa believes that individuals must be treated fairly and equally in all employment related decisions and these decisions must be based on qualifications and job-related experiences.

Children and Young Workers

Our hiring practices conform with the International Labor Organization (ILO) conventions for minimum age and child labor. We comply with all local applicable laws and regulations relating to hiring children and we do not employ children or support the use of child labor. We also encourage the creation of educational, training or apprenticeship programs tied to formal education for young people.



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Compensation

We compensate employees competitively relative to the industry and local labor market. Our compensation philosophy is clearly communicated to employees and we operate in full compliance with applicable wage, work hours, overtime and benefits laws.

Freedom of Association and Collective Bargaining

We respect our employees' right to join, to form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. Alcoa is committed to bargaining in good faith with such representatives.

Relationships with Communities

We recognize and respect the diversity, cultures, customs and values of the people in communities where we operate and take into account their needs, concerns and aspirations regarding their heritage and traditions. Furthermore, the Company recognizes its impact on these communities. We are committed to engaging with stakeholders in these communities to ensure that we are listening to, learning from and taking into account their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

We encourage all community stakeholders to report and express their concerns relating to our business activities. We maintain the [Alcoa Integrity Line](#) as the reporting mechanism for community stakeholders to report these issues: In the event that our business activities are suspected of causing or contributing to human rights compliance issues, we will investigate, address and respond to the concerns raised and take appropriate corrective action in response to any substantiated allegation.

Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained for employee privacy and dignity.

Data Privacy

We are committed to protecting the personal information of all individuals and to leverage data as an enterprise asset and mitigate risk of data breach, data losses or misuses. It is Alcoa's policy to comply fully with all applicable data privacy laws which it is subject to in the countries where it does business and is committed to collect, process and transfer personal data responsibly and in accordance with the principles and obligations set forth in the Alcoa Data Privacy Policy unless it conflicts with stricter requirements of local law.

Suppliers, Contractors and Joint Ventures

We expect our suppliers, contractors, and our non-controlled corporate affiliates ("joint ventures") to treat their employees and to interact with communities in a manner that respects human rights and is consistent with the spirit and intent of this policy. We require that our suppliers, contractors, and joint ventures adhere to all applicable domestic laws and encourage them to be consistent with ILO core labor principles. We also engage with our key suppliers, contractors, and joint ventures to reinforce awareness of potential human rights issues. We have established and maintain appropriate procedures to evaluate and select suppliers, contractors, and joint ventures based on our core values, human rights policy, and Supplier Standards.



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IMPLEMENTATION

Due Diligence and Training

We continually evaluate and review how best to strengthen our approach to addressing human rights. We are committed to conducting ongoing human rights due diligence and to engage with our key stakeholders around the world to continue to improve our approach. We will develop and implement training on this policy for Alcoa employees and business partners, and annually report on our progress in our Global Sustainability Report.

Reporting

We are committed to identifying, preventing, and mitigating adverse human rights impacts related to our business activities. If you believe that a conflict arises between the language of this policy and the laws, customs and practices of the place where you work, if you have questions about this policy or if you would like to report a potential violation of this policy, you should raise those questions and concerns through the Integrity Help Chain, which includes: Your supervisor, team leader or another member of management, Human Resources, the Legal Department, your Integrity Champion, Ethics and Compliance, the Integrity Line, or the Alcoa Global Crisis Hotline (call 44-20-37452579 (U.K.) or 412-535-5194 (U.S)).

Remedy

All concerns will be promptly, impartially, and confidentially investigated and acted upon. We place importance on the provision of an effective remedy wherever human rights impacts occur. We are committed to continue increasing the capacity of our management to effectively identify and respond to these concerns. Furthermore, we continue to build the awareness and knowledge of our employees on human rights encouraging them to speak up, without retribution, about any concerns they may have. Alcoa's Anti-Retaliation policy expressly prohibits retaliation against anyone who reports any issue in good faith.

WHERE TO DIRECT QUESTIONS

Please email Alcoa's Human Rights Council at HumanRightsCouncil@alcoa.com