

# Alcoa Integrity Line



“At Alcoa, it is our expectation that every employee is accountable for their behavior and our reputation for integrity.”

BILL OPLINGER, CEO



Our Code of Conduct transforms our Alcoa Values into action. It is our responsibility to speak up whenever we encounter behavior or actions that violate the Code. Access the Code at <https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct>.

## 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<br>French: 866-269-7644       |
| China         | 400-601-5382  |
| Hungary       | 0680982577  |
| Iceland       | 800-8301  |
| Italy         | 800-784-622   |
| Netherlands   | 0800-022-4053<br>For mobile use only: 0800-292-9203 |
| Norway        | 800-12-410  |
| Spain         | 900-95-1247<br>For mobile use only: 900-822-547     |
| Suriname      | Step 1: 156<br>Step 2: 866-269-7649                 |
| Switzerland   | 0800-56-4358  |
| Saudi Arabia  | 1-800-844-0846                                      |
| United States | 1-800-346-7319                                      |

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

### WEBSITE:

<https://secure.ethicspoint.com/domain/media/en/gui/29154/index.html>

### MAIL:

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

### E-MAIL:

[EthicsandCompliance@alcoa.com](mailto:EthicsandCompliance@alcoa.com)



## 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 (E&C) Organization
- Legal Department
- Your Integrity Champion
- Integrity Line
- Subject matter experts (e.g., Corporate Finance, Internal 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: <https://secure.ethicspoint.com/domain/media/en/gui/29154/index.html>

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 ANTI-RETALIATION POLICY

**Alcoa has an anti-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?

An independent company receives all reported issues and concerns reported through the Integrity Line and promptly directs them to our E&C organization for follow-up using the following procedures:

- The reporter is given a private code to 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.
- Our E&C organization conducts an initial review of the matter to determine the most appropriate method of investigation. Where appropriate, the E&C organization sends the matter directly to the relevant Alcoa location for investigation. Investigations that are not appropriate for the location to handle are retained for investigation by the corporate E&C organization.
- Investigations are handled promptly, thoroughly, and

confidentially.

- If not anonymous, the identity of the reporter is kept strictly confidential and only disclosed to authorized persons, when necessary, to carry out the investigation or as otherwise required by law.
- A final determination is made as to whether the allegation or concern was substantiated or unsubstantiated. The response to substantiated matters is determined on a case-by-case basis and may include disciplinary action, up to and including termination. It is tailored to the seriousness of the substantiated facts.
- Employee participation, cooperation, and truthfulness in the investigation process is required.
- 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.



## 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