



**2025 Global
Modern Slavery
Statement**

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This Statement is disclosed in line with section 14 of the Australian *Modern Slavery Act 2018* and section 11 of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023*.

Reporting period: January 1, 2025 – December 31, 2025

Issuer: Alcoa Corporation, on behalf of controlled entities (see Appendix A)

Publication & registers: The Statement will be posted on Alcoa's website and, as applicable, to public registers in the relevant jurisdictions.

1. Introduction

Alcoa is committed to respecting human rights and preventing modern slavery across our global operations and value chains, consistent with our Values to **Act with Integrity, Operate with Excellence, Care for People** and **Lead with Courage**. This commitment is reflected across the policies, standards and governance systems that guide how we identify, prevent and address risks to people in the course of our business activities. This includes our [Human Rights Policy](#), Human Rights Management Standard (HRMS) and [Supplier Standards](#).

In this Statement, “modern slavery” is defined in line with applicable national legislation, including Australia’s *Modern Slavery Act 2018* and Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. Under these laws, modern slavery encompasses practices such as slavery, servitude, forced labor, debt bondage, human trafficking, deceptive recruitment for labor or services, forced marriage, and child labor that is prohibited under applicable law.

1.1 Purpose of This Modern Slavery Statement

Alcoa has a zero-tolerance approach to modern slavery. We adhere to relevant laws and regulations relating to modern slavery and are committed to transparently reporting on our efforts to identify and address these risks. Legislation applicable to Alcoa’s operations include Australia’s *Modern Slavery Act 2018* (Cth) and Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

This Statement is limited in scope to modern slavery risks relevant to Alcoa’s operations and supply chain, including risks that are also relevant for the purposes of the Norwegian Transparency Act (NTA). While this Statement supports Alcoa’s compliance with the NTA, the statutory disclosure requirements for Alcoa entities subject to the NTA are met through a separate filing, namely the Norway Annual Report. This Statement should be read together with Alcoa’s 2025 Sustainability Report, which provides additional detail on Alcoa’s human rights approach and further supports NTA compliance.

This Statement describes the steps taken by Alcoa Corporation and its owned and controlled entities during 2025 to identify, assess, prevent, and mitigate modern slavery risks within our operations and supply chains. It outlines the due diligence processes we apply, the actions undertaken, and the measures used to evaluate their effectiveness.

Scope

This Statement covers the period from January 1, 2025 to December 31, 2025 and is issued by Alcoa Corporation¹ on behalf of its controlled entities (see Appendix A). It is intended to meet mandatory reporting requirements where we are obligated to report, namely Australia and Canada, and provides global coverage for completeness and continuity with prior reporting.

This Statement includes non-operating Alcoa locations, including closed or curtailed operations in Australia where decommissioning, remediation, and rehabilitation activities continue, as well as locations in Canada, Hungary, Italy, the

¹ Note: “Alcoa,” “the Company,” “we,” “us,” and “our” refer to Alcoa Corporation and its controlled entities. While laws apply to specific jurisdictions, we report globally for completeness and continuity with prior reporting.

Netherlands, Norway, and Spain. This statement also covers Alcoa's operations in Brazil, Iceland, Spain, and the United States, which currently do not have modern slavery-specific reporting requirements applicable to our operations, and where Alcoa does not have reporting obligations under relevant non-financial disclosure laws.

1.2 Development of This Statement

This Statement was developed through a multi-step internal consultation process to comply with applicable regulatory requirements, and is further informed by:

- Benchmarking against reporting recommendations across Australia, Canada, and expectations set by the Aluminium Stewardship Initiative (ASI), International Council on Mining and Metals (ICMM), International Aluminium Institute (IAI) and other industry frameworks. External benchmarks utilized in this report were chosen as they are commonly used across our industry and represent industry best-practice frameworks.

- Review of our policies, standards, procedures, supplier management tools, training resources and site-level documentation.
- Insights from engagement with key internal stakeholders across Responsible Sourcing, Procurement, Social Performance & Human Rights, Ethics & Compliance, Operations and regional teams, who provided context on 2025 activities, ongoing challenges and priorities for 2026.
- Input and review from relevant internal subject-matter experts and senior leadership.
- Independent analysis and drafting support from an independent third party.

This Statement was prepared by Alcoa Corporation, as the reporting entity, through consultation within the Alcoa corporate group. As part of this process, all managed reporting entities were given an opportunity to review the draft Statement, provide comments, and ask questions, including through circulation to the reporting entities' relevant directors for review and attestation, as applicable. Other owned and controlled entities were also consulted and provided with the draft Statement to invite input and clarification as appropriate.

2. Alcoa's Business, Operations, and Supply Chain

Alcoa Corporation is a publicly traded aluminum company headquartered in Pittsburgh, Pennsylvania, USA. Through a network of wholly owned subsidiaries and managed joint ventures, Alcoa is active in all aspects of the upstream aluminum industry with bauxite mining, alumina refining, and aluminum smelting and casting, supported by a global supply chain of goods and services relevant to these activities.

For the purposes of Australia's *Modern Slavery Act*, the reporting entity is Alcoa of Australia Limited, a wholly owned subsidiary of Alcoa Corporation. Alcoa of Australia Limited operates as part of Alcoa Corporation's consolidated group and is supported by shared corporate, technical, and commercial functions that enable consistent governance and oversight across owned and controlled entities. Further detail on Alcoa's corporate structure, including the Australian reporting entity and its wholly owned subsidiaries, is provided in Appendix A.

With our global headquarters in the U.S., Alcoa operates or holds ownership interests in 25 locations across eight countries on five continents, and we are supported by a global workforce of 17,316 people.² This global footprint allows us to serve customers worldwide while applying consistent standards for safety, sustainability, and operational excellence across diverse geographies. Our global footprint also shapes where human rights and modern slavery risks may arise across different production contexts, workforce structures, and regulatory environments.

2.1 Our Business

Alcoa operates through two primary business segments: Alumina and Aluminum. Together, these segments enable us to produce critical materials that are used in the development of products that we use each and every day.

In 2025, Alcoa produced 37.5 million dry metric tons (mdmt) of bauxite, 9,640 thousand metric tons (kmt) of alumina, and 2,319 kmt of aluminum.

² 17,316 employees include all employees from Alcoa operations and 100% of employees from managed joint ventures (JVs). The number of employees reported in Alcoa's 2025 Form 10-K (~14,900) includes all employees from Alcoa operations and a percentage of employees based on Alcoa's share of managed JVs.

2.2 Operations

Alcoa's operations focus on the upstream aluminum value chain, including bauxite mining, alumina refining, aluminum smelting and casting.

Through the **Alumina** segment, we mine bauxite (a natural ore) and refine it into alumina, the primary input for aluminum metal production. In our **Aluminum** segment, we smelt and cast aluminum, transforming alumina into aluminum metal

and shaping it into products used by customers around the world. These products range from standard aluminum ingots to specialized forms that support our customers' advanced manufacturing and downstream applications. This segment also includes our energy assets in Brazil, Canada, and the United States. These assets supply electricity to the grid and our own operations.



2.3 Supply Chains

Our supply chains encompass a large, globally distributed network that provides the raw materials, equipment, technical services, and logistics required to support our activities. In 2025, 10,650 suppliers across 87 countries supported approximately US\$12 billion in procurement activity.

Our suppliers provide a wide range of goods and services essential to upstream aluminum production. Our primary spend categories include:

- Raw materials;
- Energy;
- Transportation and logistics;
- Direct and indirect services; and
- Capital equipment.

Our supply chain is global in nature and the following table outlines our percentage of annual spend per main sourcing regions where our suppliers are located.

Sourcing Regions/ Supplier Region	Percentage of Supply Chain Spend
North America	25%
Europe	22%
Australia	16%
Asia	16%
South America	16%
Africa	3%
Other regions	2%

At Alcoa, we utilize third-party provider EcoVadis, a supplier risk-mapping and sustainability ratings assessment tool, to screen and audit our suppliers and provide us with insights into supplier risks, assessing a range of factors including, but not limited to sustainability criteria, industry sectors, media monitoring and suppliers' questionnaire responses. Supplier assessments are conducted on an ongoing basis across our global supply base.

According to EcoVadis, higher-risk industries in which our suppliers operate include the following: transportation, raw materials, facility maintenance, alloys, refractories, business process outsourcing, electrical parts and equipment.

3. Governance, Policies, and Standards

3.1 Governance

Respect for human rights is embedded into policies and management systems throughout Alcoa. Accountability for the governance and application of our standards, including the Human Rights Management Standard, is held cross-functionally and at the highest levels of the organization.

Day-to-day accountability for human rights risk management, including modern slavery risks, is undertaken across our External Affairs, Commercial, and Operations functions:

- Our Human Rights team, which reports within External Affairs, is responsible for implementing and monitoring our human rights approach, globally.
- Our Responsible Sourcing team, which reports within our Commercial function, manages our approach to supplier sustainability across the value chain.
- Our operations teams at each location identify and address emerging modern slavery risks through our operational risk management program.

Human Rights Council

Oversight and coordination of Alcoa's human rights approach are supported through the Human Rights Council, which is led by the Human Rights team. In 2025, the Human Rights Council operated as a cross-functional body of senior leaders from across the business that develops strategy and monitors implementation of our human rights approach across functions and regions. The Human Rights team also provides expert technical support to our regional and site-level teams to implement actions identified through our due diligence process.

Board of Directors

The Safety, Sustainability and Public Issues Committee of Alcoa's Board of Directors provides oversight on matters relating to corporate and social responsibility.

3.2 Policies and Standards

Our governance approach is supported by policies and standards that define our Company commitments and operational expectations.

- Our **Code of Conduct and Ethics** (Code of Conduct) sets expectations for how we conduct business worldwide, consistent with our values and applicable laws and regulations, and includes explicit commitments to respect human rights. It reinforces ethical behavior, requires reporting of concerns, and provides access to our global Integrity Line. It explicitly prohibits the use of child labor or forced labor in any of our business activities, requires that we never knowingly engage with suppliers that use child or forced labor, and sets clear expectations that all employees and business partners act in accordance with fundamental human rights principles.
- Our **Human Rights Policy** outlines our respect for the fundamental rights of workers, communities, suppliers, and contractors. It prohibits all forms of modern slavery, including slavery, servitude, forced labor, debt bondage, human trafficking, deceptive recruitment for labor or services, forced marriage, and child labor. Our policy also recognizes that respect for human rights is an active responsibility, requiring that we conduct human rights due diligence to identify, assess and address impacts on those affected by our operations and supply chains.
- Our **Supplier Standards** set requirements for suppliers and contractors, and are embedded in tender documentation and contracts. They clearly establish our expectations related to labor rights, safe working conditions, wages and benefits, and accessible complaint mechanisms. They make it clear that suppliers must never participate in human trafficking, use child labor, or use forced labor of any kind.

Our policies and standards are informed by the [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#), the [OECD Guidelines for Multinational Enterprises](#), and internationally recognized labor standards, including the ILO [core conventions and Declaration on Fundamental Principles and Rights at Work](#). These commitments are also reinforced through alignment with broader responsible mining and sustainability expectations, such as the [International Council on Mining and Metals \(ICMM\) Performance Expectations](#), the [UN Global Compact principles](#), and external responsible-sourcing frameworks such as the [Aluminium Stewardship Initiative \(ASI\) Performance Standard](#) and the [London Metal Exchange \(LME\) Responsible Sourcing requirements](#). Together, these frameworks guide how modern slavery risks are identified, prioritized, and addressed across our operations and supply chains.

- Our **Human Rights Management Standard (HRMS)** sets the requirements for identifying, assessing, and managing human rights risks across our operations. It outlines expectations for due diligence, stakeholder engagement, impact mitigation, and complaints handling, and establishes a consistent approach for applying human rights commitments across all locations.
- Our **Contractor Management Standard** provides consistent expectations for contractor work management, safety, productivity, and governance, and reinforces Alcoa's human rights commitments, including the prohibition of child labor, forced labor, and other modern slavery practices in contractor activities.

In addition to these key instruments, the [Anti-Corruption Policy](#) and its supporting procedures prohibit fraud and other corrupt practices, reinforcing our expectations for ethical conduct and responsible business practices across our operations and supply chain.

Communication, Enforcement, and Integration

Our policies are communicated through leadership messaging, role-based training and internal guidance. The Code of Conduct applies to all employees, officers, and directors of Alcoa Corporation, its subsidiaries, and entities it controls and is reinforced through required annual training and attestation, as well as onboarding training for new hires.

Expectations for suppliers are communicated through the Supplier Standards and our Code of Conduct, which are embedded in tender documentation and contractual terms and reinforced through ongoing supplier relationship management. Our Code of Conduct is publicly available in eight languages on our corporate website.³

We apply and integrate our policies through established management systems and commercial controls. At the operational level, our regional and site teams, including leaders from Operations, Health & Safety, Human Resources, Sustainability, and Legal, are responsible for reviewing and validating human rights assessments findings and implementing associated Human Rights Action Plans (HRAPs). They also escalate material findings to executive leadership in line with the HRMS governance process. At the corporate level, the Human Rights team provides guidance and coordination, leads human rights assessments and develops HRAPs, ensures consistent implementation of our human rights commitments across the business, and supports escalation where significant risks or issues are identified.

In our supply chain, the Responsible Sourcing Framework and Supplier Standards define our expectations and the mechanisms used to enforce them. Procurement and Responsible Sourcing teams apply these requirements through supplier screening, risk-based assessments, contract clauses, corrective action plans (CAPs), and follow-up verification. Where suppliers do not meet expectations, we may require enhanced monitoring, and demonstrable improvements or, if necessary, disengagement.

Alcoa's policies and standards are reviewed at least every three years by the corporate functions that own them, with oversight from the relevant executive leaders or governance committees to ensure ongoing alignment with best practice and evolving regulatory requirements.

³ <https://www.alcoa.com/global/en/who-we-are/ethics-compliance/code-conduct>

4. Risk Management and Due Diligence

Alcoa’s risk assessment and due diligence approach applies a risk-to-people lens to identify, assess, address, track, and communicate human rights and modern slavery risks across our operations and supply chains. This approach is grounded in the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

Certain locations started to integrate human rights and modern slavery risks into Alcoa’s Operational Risk Management (ORM) system. This will enable location-level human rights risk identification and management to be embedded within operational risk management processes, supporting more consistent oversight, escalation, and accountability across the business.

4.1 Operations

Risk Identification

All operational Alcoa sites have either completed or are in the process of completing human rights due diligence, as part of Alcoa’s Human Rights Management System (HRMS), typically every three to five years. More frequent updates may be triggered by significant contextual changes, such as shifts in government policy, civil unrest, or major operational changes. Country-level human rights risk screening, informed by external indices referenced in the HRMS, such as the [World Justice Project](#) and the [Fragile States Index](#), forms part of the human rights baseline conducted within these assessments. In accordance with the UNGPs, this approach allows us to evaluate whether Alcoa’s activities may cause, contribute to, or be directly linked to modern slavery, and—where risks are identified—to implement actions proportionate to the level of risk.

At ASI-certified sites, the initial human rights assessment required for certification is completed and then reviewed periodically to maintain alignment with ASI Performance Standard expectations.⁴ We integrate these updates into the HRMS assessment cycle.

Human Rights Due Diligence in Operations

Alcoa’s human rights due diligence framework for operations includes the following steps:

- Identify, assess, and prioritize risks and impacts through Human Rights Impact Assessments (HRIAs), Human Rights Risk Assessments (HRRAs), or human rights screenings.
- Address and remediate risks through Human Rights Action Plans (HRAPs), corrective action plans, and direct engagement with sites and stakeholders.
- Manage and revise actions based on changes in risk, effectiveness reviews, and new information.
- Report and communicate outcomes through corporate governance processes, sustainability reporting, and required modern slavery disclosures.

According to our due diligence framework, assessments may involve document review (including site-level records, policies, protocols, and incident reports); evaluation of employment and contractor practices; evaluation of security management practices; direct observation of working and living conditions; and interviews or focus groups with employees, contractors, community representatives, and potentially vulnerable groups. Identified risks/impacts are assessed in line with the UNGPs and resulting actions are documented in a HRAP that assigns accountability and timelines for completion.

Material findings are escalated to the Human Rights team and, where necessary, to executive leadership in accordance with HRMS governance requirements. Human rights due diligence is also embedded within existing operational systems, such as health and safety audits, operational risk assessments, workforce and contractor management processes, and security reviews.

⁴ <https://aluminium-stewardship.org/about-asi/members/Alcoa-Corporation>

Our internal processes and procedures are designed to support human rights due diligence for key topics, including modern slavery-related risks. This includes processes to evaluate worker ages, protect young apprentices, uphold collective bargaining agreements and unionization rights, and address potential issues related to working hours, discrimination, harassment, and health and safety exposures.

Governance and Accountability

Governance and accountability for operational human rights due diligence are shared across site, regional, and corporate levels.

Site leadership and other functional leadership, including Operations, Health & Safety, Human Resources, Sustainability, Social Performance, and Legal teams, are responsible for implementing HRMS requirements and developing and executing the HRAPs.

Regional Social Performance Directors provide oversight, consistency checks, and technical support, and coordinate cross-functional review of findings.

At the corporate level, our Human Rights team leads our human rights program and development of assessments, maintains and updates the HRMS, provides guidance on salient risks, and—where required—escalates issues to executive leadership.

Alcoa's Human Rights Council, a cross-functional senior leadership body, reviews human rights risks and priorities, provides strategic guidance, and ensures alignment of human rights expectations across functions and regions (see "Governance", [page 7](#)).

4.2 Supply Chain

We identify and manage modern slavery risks in our supply chain through our Responsible Sourcing Framework, which comprises our Supplier Sustainability Program (SSP) for external engagement with suppliers, coupled with internal tools and decision-making through our Responsible Sourcing Program. This forms the foundation of our supplier due diligence approach. In particular, the SSP establishes clear expectations for human rights, environmental performance, social practices, and governance, and provides a structured process for assessing suppliers and supporting ongoing improvement.

Integrated and Data-Driven Approach

The SSP integrates supplier screening, monitoring, and corrective actions through a continuous Assess–Audit–Advance cycle:

- **Assess** refers to the initial screening, risk classification, and continuous monitoring, that determines the level of risk for a given supplier. Subsequent parts of the process—and further due diligence required—will be defined by the results of this assessment.
- **Audit** requires suppliers to participate in different digital assessments, based upon the supplier's initial risk screening. Selected suppliers will be engaged through the Supplier Site Collaboration (SSC) Program, which provides enhanced on site evaluation.
- **Advance** enables suppliers to receive guidance, capacity building (including e learning), and targeted support to help strengthen their practices over time, especially where specific risks or gaps have been identified.

Throughout the Assess-Audit-Advance cycle, Alcoa uses the EcoVadis suite of services as the principal source of initial and continuous assessment. Through our third-party partner, suppliers are screened, scored, and monitored based on publicly available data, country risk, commodity risk, and supplier specific questionnaires. This includes modern slavery-specific datasets such as the Global Slavery Index. Alcoa also leverages other data intelligence tools and registries to identify and evaluate supplier risks. These inputs help identify suppliers that may require a deeper review, including digital questionnaires tailored to risk context, accelerated reassessments, or onsite engagement where warranted. Supply Chain oversight is led by our Responsible Sourcing team, supported by our Procurement, Energy, Commercial, Legal, Ethics & Compliance, and Social Performance & Human Rights teams where relevant. Together, these teams manage supplier-related human rights and modern slavery risks through due diligence, continuous monitoring, contracting requirements, and direct supplier engagement. They provide oversight so that risks are identified and escalated appropriately, nonconformances are addressed, and Alcoa's expectations are consistently applied across procurement activities.

4.3 Engagement With Suppliers

Throughout the Supplier Sustainability Program (SSP), Alcoa engages suppliers at varying levels through a risk-based human rights due diligence approach. All suppliers are engaged at an appropriate level during the SSP's Assess-Audit-Advance cycle, while more intensive, direct engagement is undertaken with a select group of suppliers identified as higher risk, including through our Supplier Site Collaboration (SSC) program. The SSC program involves targeted, on-site engagement with invited suppliers to collaboratively evaluate risk, share information, and manage risks through

the development and implementation of CAPs. Audits are conducted at supplier facilities and are carried out by trained Alcoa personnel using methods such as direct observation, document review, and interviews. These engagements focus on evaluating suppliers' human rights risks—including risks related to modern slavery—and deepen our engagement with those suppliers to support improvements.

SSC engagements help surface potential modern slavery risks that may not be evident through screening alone. Indicators relevant to modern slavery include recruitment practices, employment arrangements, and working conditions. SSC engagements may also include worker interviews to help identify issues that are not apparent through documentation or digital assessments.

SSC engagements are carried out in line with the procedures defined in our Responsible Sourcing Framework. Where modern slavery-related risk indicators are identified, suppliers are required to develop CAPs. Progress against these actions is monitored through our responsible sourcing governance processes, with escalation to Alcoa's senior leadership where necessary.

Suppliers invited to participate in the SSC program meet certain risk criteria defined by our SSP. These criteria are as follows:

- The supplier has a low score in the labor and human rights section of the supplier ratings assessment;
- The supplier has a significant finding identified through our media monitoring program (360 Watch); or,
- The supplier operates in a potentially higher-risk industry and/or country.

Suppliers may also be selected for our participatory audits for other reasons, at the discretion of Alcoa's Responsible Sourcing team.

In 2025, we engaged 12 suppliers through our SSC program. Based on initial screening and assessment results, these suppliers were selected due to operations in higher-risk geographies and industries, particularly where risks may arise through extended subcontracting or labor recruitment practices.

4.4 2025 Findings, Actions, and Outcomes

We have used insights from site-level due diligence, supplier screening and monitoring tools, field audits, and internal reporting processes in 2025 to shape targeted actions to address modern slavery-related risks across our operations and supply chain.

4.4.1 Operations

In 2025, no incidents of modern slavery were identified in our operations.

However, in 2024, our human rights due diligence identified a process improvement opportunity related to working hours in the United States. During 2025, Alcoa implemented enhanced global monitoring and fatigue management controls, including KPIs and a centralized time-and-attendance dashboard. These measures have strengthened oversight and confirmed that working time practices are effectively managed in line with applicable laws and collective agreements.

4.4.2 Supply Chain

In 2025, no incidents of modern slavery were identified in our supply chain.

Through our SSP, we maintained broad assessment and auditing coverage of our global supplier base using EcoVadis, including monitoring and tracking of corrective actions. In 2025, we facilitated on-site supplier engagements with 12 suppliers through our SSC program.

Key Outcomes in 2025

In 2025, Alcoa identified two potential modern slavery-related matters through its due diligence processes. Both were investigated and assessed using established review and escalation mechanisms, which confirmed that neither met recognized indicators of modern slavery and no reportable incidents were identified. These outcomes demonstrate that our monitoring systems are functioning as intended—flagging potential risks for review—while appropriately filtering out matters that are not material or within scope of reporting.

4.4.3 Complaints Mechanisms and Access to Remedy

Alcoa maintains multiple channels for raising concerns, including site-level complaints mechanisms for community members in relevant languages. Our global Integrity Line (described in more detail below) is accessible to all employees, contractors, suppliers, and community members.

In 2025, no reports related to modern slavery were received through the Integrity Line (see below) or any other complaints mechanism.

Site-Level Community Complaints Mechanisms

Alcoa's site-level community complaints mechanisms are designed for community members and operate in line with our Global Complaint Management Procedure. This procedure sets minimum requirements and outlines steps for intake, triage, investigation, response, appeal, remedy implementation, and closure verification. Standard timeframes include acknowledgement of the complaint within two business days, investigation within 10 days, and communication of outcomes within 20 days, with an established appeal process at the site-level.

Where community complaints require remediation, we seek outcomes-oriented solutions aligned with responsible business and human rights frameworks and tailored to the specific context. Site-level mechanisms continue to expand across our operating locations through cross-functional collaboration.

Integrity Line (Whistleblower Hotline)

The Integrity Line is Alcoa's toll-free confidential whistleblower hotline, operated by NAVEX Global and available 24/7 in multiple languages. It can be accessed by employees, contractors, suppliers, community members, and other concerned parties, with the option to report anonymously online or by phone.

Upon receiving a report, NAVEX provides the caller with a reference number that allows the caller to check for updates. Our Ethics & Compliance team promptly confirms receipt, determines the appropriate investigative approach, and identifies whether the matter should be handled locally, regionally, or corporately. Where allegations are substantiated, the Ethics & Compliance team follows up to ensure recommended actions are implemented. Caller confidentiality is protected throughout the process unless disclosure is required by law, or is otherwise impractical.

We assess the effectiveness of the Integrity Line through independent quarterly audits, and also through annual benchmarking reports from NAVEX, which provide metrics on case volume, allegation categories, substantiation rates, closure times, and usage patterns. If and when concerns related to modern slavery are raised through the Integrity Line, they are escalated to our Social Performance & Human Rights team.

Supply Chain

We expect our suppliers to maintain their own effective complaints mechanisms, and we support this expectation through engagement, dialogue, and capability building. In 2025, 73% of our audited suppliers have complaints mechanisms which represent an increase of 3% from the previous year.

Audited Suppliers with Complaints Mechanisms



4.5 Remediation

Our Human Rights Policy establishes the requirements for effective remediation should we cause or contribute to an adverse human rights impact. Whether a potential impact is identified through our human rights due diligence for operations, our SSP, or through one of our complaints mechanisms, we will initiate improvements through time-bound CAPs.

Remediation of modern slavery impacts require case-specific approaches, and may include a combination of enhanced supervision, targeted training, new operational controls, and verification through follow-up engagements. Where supplier performance does not improve, or where critical risks persist despite these efforts, we may apply commercial measures, up to and including termination of the business relationship.

To strengthen and standardize remediation practices across the extractives sector, Alcoa supported the development of the [Modern Slavery Response and Remedy Framework](#), a publicly available resource created in collaboration with [Australia's Human Rights Resources and Energy Collaborative \(HRREc\)](#), Walk Free, and peer companies. This framework complements our supplier engagement approach by providing structured guidance for companies addressing modern slavery risks in their value chains.

5. Training and Capacity Building

Training is a central component of our approach to enhancing the ability of employees, contractors, suppliers and other external stakeholders to identify, assess and respond to risks associated with modern slavery.

5.1 Training for Employees and Contractors

We deliver a role-segmented suite of internal training to embed human rights considerations into our work. Core programs include Code of Conduct and Integrity Line awareness sessions, and modules delivered via corporate learning systems; these set expectations on ethical conduct, reporting concerns, and anti-retaliation, and outline responsibilities under the Human Rights Policy and HRMS. For some roles (e.g., operational leaders, supervisors and specialists), additional content covers human rights concepts, decent working conditions and modern slavery risks, and is integrated into onboarding training, with periodic refreshers.

In 2025, 100% of enrolled employees completed Alcoa's annual Code of Conduct training, which covers expectations related to ethical conduct, reporting concerns, and anti-retaliation. Human rights-specific training is delivered through separate, targeted modules for relevant roles, with refresher cadence either annual or biennial depending on the role and risk exposure. In 2025, we developed new human rights training, with delivery commencing in 2026 for leadership and subject matter experts. This training was informed by external human rights specialists and combines live sessions with corporate learning system modules. The curriculum focuses on how to apply human rights due diligence in practice, linking roles and accountabilities to the

HRMS; recognizing salient issues in operational contexts; strengthening the use of complaints mechanisms (such as when to escalate, and how to protect against retaliation); and working through scenario-based exercises that translate policies into concrete actions.

In parallel, some of our site-level teams received locally contextualized human rights training that complements the global content and supports on-the-ground implementation of actions coming out of due diligence and complaints reviews.

5.2 Training for Procurement and Commercial Teams

Alcoa's Procurement and Commercial teams play a central role in the identification and management of modern slavery risks within Alcoa's supply chain. To support this responsibility, training is delivered through Procurement University, our internal learning platform for procurement teams, and through sustainability-related training modules that embed human rights expectations throughout the sourcing lifecycle. Content across these modules reinforces responsibilities under our Responsible Sourcing Framework, explains how supplier screening and assessment tools function (including EcoVadis and related tools), and clarifies escalation pathways and corrective action expectations.

5.3 Supplier and Third-Party Training and Capacity Building

Alcoa is committed to strengthening supplier performance and reducing modern slavery risks in our supply chain, and we support supplier capacity building through several mechanisms.

Suppliers undergoing sustainability assessments have access to the EcoVadis Academy, enabling them to pursue training related to specific areas of improvement. In 2025, 8% of our suppliers completed training related to labor and human rights through the EcoVadis Academy as part of their assessment and remediation processes, contributing to improvements in governance and performance within the supply chain.

These resources complement our targeted supplier engagements, including activities through our SSC program. Through these collaborative engagements, suppliers receive guidance, participate in worker interviews, and work closely with our teams to develop and implement corrective actions. Supplier training and engagement also occur through direct dialogue, capacity-building workshops, and communication of updated expectations during procurement processes. While training delivery varies by region, supplier category and assessment route, our goal remains consistent: to strengthen supplier understanding of Alcoa's standards and to support improvements in labor practices that help prevent modern slavery and related adverse impacts.

6. Assessing Effectiveness

We evaluate the effectiveness of our actions to identify, manage, and reduce risks to people, including risks associated with modern slavery, through a combination of KPIs, management reviews and internal audits, supplier performance metrics and, where applicable, third-party validation. Our approach is embedded within our broader human rights management system, which includes ongoing monitoring, internal review, and continuous improvement.

We verify that commitments are effectively implemented, and track feedback and agreed KPIs over time. This includes post-implementation checks on our community complaints and Integrity Line processes (considering complainant feedback and KPIs on timeliness, satisfaction, and repeat cases), and periodic reassessment through our human rights impact assessment cycle (typically every three to five years, or sooner if conditions change).

6.1 Effectiveness Monitoring and Indicators

6.1.1 Operations

We review site-level findings on an issue-by-issue basis, including action plan development and delivery status, complaints mechanism performance for community complaints, and verification of remedy implementation where applicable.

During 2025, effectiveness monitoring focused on case-specific checks such as whether agreed actions are implemented and issues do not recur, with outcome-oriented verification where feasible (e.g., evidence of reduced risk indicators, timely closure of actions, and confirmation from affected workers or their representatives). Site and regional management review outputs and escalate through established management channels.

To further strengthen these practices, Alcoa is formalizing a more structured monitoring framework and governance approach, which began in 2025 and is continuing into 2026 to further systematize effectiveness monitoring across operations.

Building on practices outlined in our 2024 Modern Slavery Statement, operational indicators of effectiveness continue to include:

- Fair wage assessments, including ongoing reviews of pay practices;
- Availability of collective bargaining agreements, as an indicator of worker representation;
- Health and safety data, including leading and lagging indicators that reflect working-condition risks;
- Actions to prevent child labor in the workforce, including verification during onboarding and contractor oversight;
- Worker feedback and complaint logs, which help assess whether workers perceive their environment as rights-respectful.

For the 2025 reporting period, operations-level performance data informed our human rights due diligence program and effectiveness monitoring. Ongoing validation and consolidation of this data supports continuous improvement and will further strengthen how outcomes for affected stakeholders and the effectiveness of our due diligence processes are demonstrated over time.

6.1.2 Supply Chain

To understand whether our actions are improving supplier practices over time, we review screening coverage, assessed-spend coverage, supplier ratings and trends, the number and depth of on-site engagements, and the status and sustainability of CAPs, including closure and follow-up verification. Where relevant, this also includes insights from targeted on-site engagements. These metrics are reviewed through the Responsible Sourcing program governance and integrated into sourcing and contract decisions.

In 2025, we maintained broad screening and assessment coverage of our global supplier base through our SSP, which is powered by EcoVadis and related supply chain intelligence tools. Where relevant, targeted on-site engagements were conducted through our SSC program and used to verify improvements.

Key metrics for 2025 include:

- **Suppliers screened: 10,650 (global total).** This represents the full active supplier network reviewed through EcoVadis, with internal risk flags to establish baseline exposure and triage where deeper assessment is needed.
- **Suppliers assessed (ratings/audits): 1,182 individual suppliers,** representing **~57% of global annual spend.** Focusing assessment coverage on spend concentration allows higher-leverage relationships to be evaluated more rigorously and prioritized for engagement.
- **Average assessed supplier score on Labor and Human Rights: 58.8** (regional range 56.7–63.1; on a 0-100 scale, with 100 being the best). We use these results to sequence corrective actions and calibrate follow ups, prioritizing our efforts where scores are lowest. This compares favorably to the EcoVadis benchmark score for this category of 52.1.

- **Suppliers flagged as higher-risk by screening: 175.**

Higher-risk suppliers are flagged by country and industry-risk factors, 360° Watch media monitoring findings, or adverse indicators. These suppliers are subject to enhanced due diligence and engagement, including document reviews, targeted questionnaires, or site-level collaboration where warranted.

Effectiveness is additionally tracked through CAPs on-time closure, re-assessment outcomes for lower-scoring suppliers, and testing for non-recurrence of previously observed issues.

6.2 Management Reviews and Governance

Effectiveness is strengthened through regular management reviews at site, regional, and corporate levels, and through governance forums that evaluate trends and the adequacy of controls. Due diligence outcomes and complaints trends inform corrective measures and, where needed, escalation through established management channels. At the corporate level, the HRMS assigns oversight and reporting accountabilities for monitoring, remediation and annual performance review.

External assurance complements these activities. Operating sites are audited against the ASI Performance Standard on a three-year cycle, and, where applicable, the ASI Chain of Custody Standard. In supply chains, ASI requirements include supply chain due diligence expectations (e.g., Conflict-Affected and High-Risk Area (CAHRA) analysis and, for red-flag situations, on-the-ground assessment).

In 2025, insights from management reviews and assurance activities also informed ongoing updates to complaints mechanism design and related human rights training.

7. Future Focus

We will continue to strengthen our approach to managing modern slavery risks over the coming years, with a focus on deepening risk analysis, improving supply chain visibility and further embedding the HRMS across functions and regions.

Key actions planned for 2026 include:

- Revise and publish the updated Human Rights Policy.
- Review and update the Human Rights Council Charter.
- Advance risks integration into our Operational Risk Management approach.
- Validate and formalize Human Rights Action Plans for all sites.
- Finalize and launch implementation of the Human Rights Monitoring Framework.

8. Appendix

8.1 Entities

8.1.1 Australian Reporting Entities

Reporting Entity	ACN	Registered Address	Description
Alcoa of Australia Limited	000 364 992	Level 2 235 St Georges Terrace Perth, Western Australia, 6000 Australia	Mining, refining, smelting, casting
Alcoa Australia Holdings Pty Ltd	096 987 370	Level 2 235 St Georges Terrace Perth, Western Australia, 6000 Australia	Shareholding
A.F.P. Pty Ltd	004 513 599	Level 2 235 St Georges Terrace Perth, Western Australia, 6000 Australia	Not involved in operational or supply chain decision-making.
Alcoa Portland Aluminium Pty Ltd	006 306 752	Level 2 235 St Georges Terrace Perth, Western Australia, 6000 Australia	100% owned subsidiary of Alcoa of Australia Limited; manager of Portland Smelter.
Eastern Aluminium Pty Ltd	062 841 007	Level 2 235 St Georges Terrace Perth, Western Australia, 6000 Australia	Non-operational.
Hedges Gold Pty Ltd	005 592 067	Level 2 235 St Georges Terrace Perth, Western Australia, 6000 Australia	Not involved in operational or supply chain decision-making.
ACAP Australia Pty Ltd	058 452 556	Level 2 235 St Georges Terrace Perth, Western Australia, 6000 Australia	Not involved in operational or supply chain decision-making.
Eastern Aluminium (Portland) Pty Ltd	067 391 824	Level 2 235 St Georges Terrace Perth, Western Australia, 6000 Australia	Not involved in operational or supply chain decision-making.
Alcoa Energy Holdings Australia Pty Ltd	110 752 808	Level 2 235 St Georges Terrace Perth, Western Australia, 6000 Australia	Not involved in operational or supply chain decision-making.

8.1.2 Canadian Reporting Entities

Reporting Entity	Business Number	Registered Address	Description
Alcoa Canada Co.	13811 7494	1250 Rene-Levesque Blvd. West, Suite 3930, Montreal, Quebec H3B 4W8	Smelting & casting at Baie-Comeau.
Alcoa-Aluminerie de Deschambault L.P.	83316 5368	1, boul. des Sources, Deschambault Grondines (Quebec) G0A 1S0	Smelting & casting at Deschambault.
Alcoa Wolinbec Company ULC	83501 8961	666 Burrard Street, Suite 1700, Park Place, Vancouver (British Columbia) V6C 2X8	Smelting & casting at Bécancour.

Key Operational Sites Covered by the Modern Slavery Statement

Legislation applicable to Alcoa's operations include Australia's *Modern Slavery Act 2018* (Cth) and Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023*. Entities reporting under specific modern slavery and transparency laws are listed in the Appendix. Operations covered by such laws are:

Operations Subject to Modern Slavery Reporting Requirements

Australia

Port facilities: Bunbury & Kwinana

Bauxite mines: Huntly & Willowdale

Alumina refineries: Kwinana, Pinjarra and Wagerup

Aluminum smelters (current and former): Portland, Port Henry

Former mining / energy sites: Anglesea

Residue storage areas: Hedges

Farmlands: Pinjarra and Wagerup

Canada

Aluminum smelters: Baie-Comeau, Bécancour, Deschambault

