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Alcoa Corporation VPI Implementation Plan- 2024 Update

Contents

- 1. Overview of Voluntary Principles Implementation.....pages 1-3**
- 2. Stakeholder Engagement and Communications.....pages 3-4**
- 3. Risk Assessment Methodology..... pages 4-5**
- 4. Interactions with Public Service Providers..... page 5**
- 5. Interactions with Private Security Providers.....pages 5-6**
- 6. Assessments.....pages 6-7**
- 7. Lessons and Challenges in VPSHR Implementation.....pages 7-8**
- 8. Engaged Company's Implementation Actions.....pages 8**

Overview Voluntary Principles Implementation

In 2024, Alcoa Corporation (Alcoa) continued in the implementation of the VPI at Alcoa's global operating locations.

The primary focus of the Alcoa VPSHR implementation continued at our Brazilian operations in São Luís, Poços de Caldas and Juruá. As previously stated to the Steering Committee, Alcoa had determined that its most significant risks of security-related human rights violations were in our Brazilian operating locations. Alcoa engages more private security forces in its Brazilian operations than any other operating region. These private security forces also face the greatest risk of managing security related responses to criminal activity and civil disruptions due to the higher levels of crime and social disruptions as compared to any other location under Alcoa's direct management.

The Alcoa Global Security Department continued to promote the VPSHR at our Brazilian locations in 2024. The continuing steps were to introduce the newly appointed Alcoa Brazil executive leadership and facility leadership teams to the VPSHR mission and to Alcoa's purpose and need to implement the VPSHR standards at all the Brazilian locations. The new executive and facility leadership teams were welcoming of the VPSHR message and demonstrated their concern to have the VPSHR standards implemented at our Brazilian operations and pledged their overwhelming support for the VPSHR.

The Alcoa Global Security Team in conjunction with a third-party consultant conducted security risk assessments (SRAs) at our ALUMAR, Juruti, and Pocos Brazilian operating locations. The security assessments were conducted by the Alcoa CSO, Regional Security Manager for LATAM, and a third-party contractor, Northcott Global Solutions (NGS) who are based out of London. The thorough security assessments reviewed the over-all security programs at the locations, the quality and performance of the private security forces, and adherence to the VPSHR standards in interactions between private and public security forces regarding both facility personnel and the local communities.

Once the SRAs were completed and associated risks to the facility's security program and Voluntary Principles were identified, the Global Security Department began engaging the Alcoa private security vendor GR, on the VPSHR. GR is the private security contractor for ALUMAR, Pocos, and Juruti operations. The Alcoa Regional Security Manager provided training to the Prosegur executive team on the mission of the VPSHR and Alcoa's commitment VPSHR standards for our operating locations. The executive team for GR was very supportive of the Voluntary Principles mission, and they committed to assist Alcoa in their implementation. The Alcoa Global Security Department then began the process of developing VPSHR training that could be provided to all GR managers, supervisors, and security guards operating at the Alcoa locations. The training was developed in Q2 of 2023 and refined in early 2024. The Regional Security Manager, with assistance from GR leadership, and began to roll out the training to the Prosegur personnel. The training was provided at all three locations in Q1 and Q2. In total, Alcoa trained all the associated private security personnel assigned to Alcoa locations which covered over 400 private security guards and managers. The VPSHR private security training has also been included in onboarding for all new hire private security personnel, so that all incoming private security personnel will be knowledgeable of the VPSHR standards and Alcoa's commitment to the implementation of the VPSHR at all operating locations in Brazil.

In addition to engaging with private security, the Voluntary Principles call on Alcoa to consult with public security about the impacts of Alcoa's security arrangements on human rights. In 2024, Alcoa engaged with public security forces that support our operations at our three Brazil locations on the VPSHR. The Alcoa Regional Security Manager has established a solid and cooperative relationship with the Brazilian Military Police and local authorities in the communities that we operate. Owing to political turnover, leadership in regional public security changed in 2024, necessitating that new relationships be built and new information-sharing about the Voluntary Principles was undertaken. Alcoa has developed an engagement plan for 2024 to regularly engage with public security on use of force and human rights. To date, engagement about the Voluntary Principles has been well received by the public security forces leadership, and they acknowledge the importance of human rights in all security operation on or near Alcoa locations.

In 2024, the Alcoa Global Security Department continued to build upon the VPSHR implementation successes in Brazil by continuing to implement VPSHR training to all Alcoa leadership teams, private security forces, and to the public security leadership in the communities that we operate. The Brazil locations will further have on-going assessments to be completed by the Regional Security Manager to help ensure the mitigation strategies for identified risks based off the 2024 SRAs are being properly managed and implemented. The Global Security

Department is also planning on the beginning roll-out of the VPSHR standards to other global regions that Alcoa operates. It is planned to have VPSHR informational training provided to operations in Australia, Europe, and North America. The primary audiences will be the local internal security representatives at our operating locations, private security vendors and management teams. The Global Security Department will also personally attempt to perform a few security assessments at sites in Europe, North America, and Australia if the business climate allows for the expenditures.

Stakeholder Engagement and Communications

During the continuing implementation of the Voluntary Principles in 2024, the Alcoa Global Security Department has continued to appreciate the immense value related to having close engagement with all the stakeholders of our Brazilian operations, to include facility personnel, management, private security members, public security members, and local community leaders. It has become exceedingly clear that to successfully implement the VPSHR standards will require clear and direct communications with all stakeholders on the importance and mission of the VPSHR.

As previously stated, the Alcoa Global Security Department focused heavily in 2024 on communicating the mission and purpose of the VPSHR to internal and external audiences on the importance of implementing the VPSHR and why these values of the VPSHR align perfectly with the Alcoa commitment to human rights. Alcoa has further shared the commitment to the VPSHR with other external partners, such as mining and metal partners; ICM and ASI. The engaged membership with the VPSHR has helped fortify to these organizations that Alcoa not only shares the values of the VPSHR but are committed to their full implementation at our global operations.

The Alcoa Global Security Department has been pleased with stakeholders' reception of the VPs, including within local management teams, private security partners and the public security partners. Global Security will continue to build on these successes in Brazil in 2024 by continuing to promote the VPSHR to these critical partners. The Global Security Department is further planning in 2025 to begin promoting the VPSHR to our operations outside of Brazil. There will be a focus on training our facility management team, security management and guards on the VPSHR standards in North America, Europe, and Australia.

The Global Security Department has worked successfully in Brazil with our External Affairs and Sustainability Departments to help promote Alcoa's human rights program to the local communities in which we operate. We have accomplished through a strong communication plan that has been delivered to local community leaders and organizations. There is an opportunity to better promote the VPSHR in these community outreaches and the Global Security Department will be looking for opportunities to support our external communications by providing guidance and support on the value of implementing the VPSHR at our local operations.

Lastly, Alcoa continues to make strides in the developing a strong global human rights program. This was highlighted late in 2024 by the Global Security Department fully supporting the and participating in the global Alcoa Human Rights Council.

Risk Assessment Methodology

Alcoa has taken a two-step approach to security risk evaluation in Brazil, starting with security risk assessments (SRAs), and validating their human rights-related findings through comprehensive ASI Certification audits.

In 2024, the Alcoa Global Security Department in conjunction with our third-party risk management partner, Northcott Global Solutions (NGS), performed security risk assessments at our São Luís, Poços and Jurutí operations in Brazil. The assessments covered one full week at each location and covered the entirety of the security programs security programs at each location. The key areas covered by the assessments included access controls, security management and policies, security infrastructure and technologies, and any associated risks to the operations and/or local communities. The associated risks further covered any risk to human rights violations by the private and public security forces. NGS utilizes an ISO 31000 Risk Assessment approach, and the following is an overview of the processes completed for the risk assessments. Similar SRAs were also completed at our North American operations in Louisiana and Indiana.

The NGS Security Risk Assessment (SRA) process was undertaken in phases. First was a scoping phase establishing the context of the project including both the operational footprint, and the amount and type of risk that an organization is prepared to pursue, retain, or take. Next was a critical asset inventory. The critical assets that support the project are identified in terms of the people, physical assets, information communication technology (ICT). Criticality was determined based on the assets' pertinence to human rights, information gathering, and business functioning. Next, risks were identified and assessed. The risks that may affect the project under review are identified and the level of risks assessed through consideration of the intent (or potential of a non-human threat actor) and capability (or capacity of a non-human threat actor). The consequence of relevant risks is then assessed against each critical asset in turn with consideration to the target attractiveness of the project to the threats identified and the current effectiveness of existing security controls in place. Security controls are of two types: 1. Protective Security Controls (PSC) are required to reduce the likelihood of a threat affecting the project. 2. Reactive Security Controls (RSC) are required to reduce the impact of the threat affecting the project. Risk analysis draws on the following definitions:

- Level 1 Pre-Incident Vulnerability = PSC Level x Target Attractiveness
- Level 2 Likelihood = Pre-Incident Vulnerability Level x Threat
- Level 3 Impact Consequences = Level x RSC
- Level 4 Risk Level = Likelihood x Impact

Finally, the SRA established risk mitigation strategies, assigning security controls against each risk. PSCs were identified to reduce likelihood of incidents, and RSCs were identified to reduce the impact and to lower the overall level of risk for Alcoa and local communities.

Interactions with Public Service Providers

The interaction with the Brazilian Military Police and local public service providers has been a primary focus of Alcoa's VPSHR adherence as well as its Global Security agenda. Public security providers are critical for the successful operation of our facilities and for the safety and protection of all personnel and the local communities. Alcoa has worked diligently to help support the public security providers who protect our personnel in Brazil in a challenging security environment. Our Regional Security Manager and facility leadership members have developed good relationships with these public security providers and have created an open line of communication with public security providers' local and regional leadership. Public security leadership in Brazil has been fully engaged in discussions around security and human rights and willing to freely share information with Alcoa.

In 2024, Alcoa conducted quarterly information sharing between the local public service providers, private security contractors and Alcoa's own security lead. The sessions will include engagement on the VPSHR as beneficial to all parties. Regular engagement with public security is necessary not just for VPSHR compliance but also for Alcoa's security risk management writ large, as public security forces undergo leadership turnover that results in awareness-gaps about human rights performance in the security forces.

Alcoa's relationship with public security forces is formalized through MoUs. In specific circumstances, these MoUs authorize Alcoa to provide food to public security personnel and fuel for vehicles. In São Luís, one such MoU entailed Alcoa's provision of land and material support for construction of a Military Police post proximate to our Alumar site. Alcoa does not have any public service providers assigned to our operating locations in Brazil nor at any of our global operating locations or on our payroll. Public security providers are only brought onto Alcoa facilities on an as-needed basis (e.g., in the event of emergency or criminal activity).

Interactions with Private Security Providers

Alcoa utilizes contract security providers at all our solely managed global operations and does not employ any in-house security personnel. All Alcoa global security forces are fully government licensed by the jurisdictions in which they operate. Alcoa ensures that the private security providers are properly trained and supervised in accordance with the national, regional, and local regulations for private security providers. Alcoa also has a no weapons policy, applicable to lethal and non-lethal weapons, and is undertaking a personnel screening process, elaborated below, to vet the human rights background of private security personnel.

In Brazil, security and human rights risks are present in the private security sector. To manage these risks, Alcoa Global Security in conjunction with our Procurement Department and Ethics and Compliance Department have developed a mechanism to properly vet any private security provider seeking to do business with Alcoa. Through its screening process, Alcoa has identified three private security providers in Brazil that meet our high standards for ethics, human rights, legal, compliance, and internal governance. Once a private security provider candidate is established in the procurement process, Alcoa utilizes a third-party auditor, Socrates LLC, to perform a detailed examination of the providers reputations, capabilities, legal record, and human rights records to assure that the provider is following Alcoa's commitments to professional and ethical security practices. This process was successfully completed in 2025

with the hiring of Prosegur for our private security needs in ALUMAR and Juruti operations and led to GR being replaced by Prosegur.

Once a contract is awarded, the Alcoa Regional Security Manager works closely with the leadership of the private security provider to ensure smooth and successful onboarding of a private security provider. This onboarding process helps to ensure that the provider maintains strict protocols for the hiring of security guards that meet Alcoa's standards for any personnel to enter an Alcoa facility. To help increase Alcoa's capabilities in ensuring the highest quality personnel, the Global Security Department, Human Resources Department, and Legal Department have implemented a criminal background check program in Brazil that is compliant with all Brazilian regulations. This program was successfully implemented in 2024 led to the removal of numerous employees and contractors from the Brazil operations due to previous criminal violations.

The Regional Security Manager also ensured that the private security provider has developed and implemented a detailed Post Order Manual, (SOPs), which provides clear directions to the security guards on how to perform all their security duties properly and safely on Alcoa property. The Post Orders provide directions on the importance of the VPSHR and how they must be applied to security operations at all Alcoa locations. As previously stated, a key component of this process will be to ensure all private security provider personnel receive the VPSHR training on a recurring basis and that all new hires receive VPSHR training prior to assuming their final assignments on an Alcoa location.

In 2024, significant progress was made in implementing the Voluntary Principles at all the Brazilian locations. This challenging process has helped Alcoa better understand the requirements of the VPSHR and how they can be implemented in large and remote locations. The VPSHR training materials and processes developed and implemented in Brazil have become the foundation of Alcoa's VPSHR global program. This implementation period was a great resource in helping Alcoa take the message of the VPSHR to our other operating locations in North America, Europe, Australia, and our JV venture in Guinea. This will further assist Alcoa in filling any VPSHR gaps we have at our other global operating locations.

Assessments

As noted above, Alcoa's approach to security risk evaluation involves the location SRAs that were conducted with Alcoa personnel and with the assistance of the London based third-party risk management firm, NGS and the external third-party ASI audits. The NGS SRAs were detailed in their scope and holistic approach to identify security risks associated to all Alcoa personnel and to the local communities. The SRAs were successful in their implementation and garnered substantial information on the associated security risks at our three Brazilian locations. The NGS SRAs only identified the risk pertained to civil unrest and demonstrations that could potentially lead to issues with human rights grievances between community groups and the private and public security forces working on or near the Alcoa locations. Proposed mitigation strategies from the SRAs ISO 31000 protocols can reduce this potential human rights risk from High to Low. The key components of the risk mitigation strategy involve improvements to Alcoa's physical security barriers, access controls, community engagement and communications,

training for private and public security forces to include the VPSHR training, and procedures for fielding community grievances and for properly managing these grievances in a timely and fair manner for all parties involved.

The mitigation items identified in the SRAs are being tracked monthly by Global Security to help ensure that measurable improvements are being made. A potential gap in the mitigation of these risks was to ensure all the functional groups inside Alcoa were moving in conjunction with each other to help ensure that there was a unity of mission and planning for lowering the risk of any human rights grievances. The Global Security Department has been working closely with our External Affairs Department, facility leadership, Sustainability Department and Crisis Management Teams on these processes and have seen improvement since the completion of the SRAs.

Alcoa's ASI audits validate the outcomes and management strategies laid out in our SRAs. Audits to certify Alcoa operations to the ASI Performance Standards validate our approach to security and human rights through designated standards and criteria addressing security, human rights and conflict. In 2024, Alcoa undertook corporate wide ASI certification, under audit processes conducted by DNV Business Assurance Services UK Ltd. These audits cover subject matter including human rights and security. The audits have found Alcoa conformant with ASI standards for human rights policy commitments, due diligence, and management of security and conflict risk.

Site-level ASI external audits are scheduled in Brazil, Iceland, Canada in 2024.

Lessons and Challenges in VPSHR Implementation

In Alcoa's application to the VPSHR, we identified Brazil as the operating context with the greatest human rights and security risks for Alcoa. Thus, our initial VPSHR focus was on the Brazil operations. Alcoa realized that this would be a significant challenge due to the size and remoteness of our Brazilian locations. The process of implementing the VPSHR would first require the small 3-person Global Security Department to become fully educated on the VPSHR standards so that these standards could be properly communicated to our location leadership teams and to the public and private security providers. The Global Security Department did take advantage of listening to other VPSHR members presentations to garner how they were able to achieve their implementations in environments that were in many cases more difficult than Alcoa's situation in Brazil. The Global Security Department was then able to create presentations and training materials that could be effectively shared to our internal teams and the security providers. It then became a logistical challenge to take the VPSHR message to over 400 private security leaders and guards, 50 public security leaders, and 50 internal location leaders. This challenge took numerous labor hours by our Brazil Regional Security Manager and numerous labor hours from our location specific security superintendents. The addition of implementing the VPSHR proved challenging to this small team as it was a sizable workload added to their already busy and stressful work in managing the safety and security for thousands of employees and contractors and securing hundreds of square kilometers of Alcoa property in remote and potentially dangerous environments. The Global Security Department and location leadership took on this challenge knowing that the values and mission of the VPSHR are critical

to our over-all security programs and for our ability to safely and ethically operate in the communities that Alcoa is proud to be associated.

Alcoa did have opportunity to see the implementation of the VPSHR bear fruit in 2024. In May, the Alcoa Human Rights Council performed a tabletop exercise that was related to a crisis at an Alcoa port location in Canada. The tabletop exercise was developed and implemented by a third-party risk management expert. The exercise challenged the team members to manage the crisis and related human rights violations systematically and in compliance with the Alcoa Human Rights Policy and the values of the VPSHR. The exercise allowed the team members to process how Alcoa would manage and mitigate any threat to human rights at one of our operating locations. The exercise was well received by all the team members and allowed the Human Rights Council and Global Security to better understand how critical it is to ensure that the values of the VPSHR are fully implemented at our operating locations and that all team members are fully trained on the VPSHR.

Alcoa believes that by facing the VPSHR implementation challenges in Brazil and with the learnings from the tabletop exercise the organization is now much better prepared to take the materials and lessons learned from the implementation and actual security incidents to help implement the VPSHR at our remaining global operating locations in 2024 and 2025.

Engaged Company's Implementation Actions

Requested Actions

1. Alcoa began undertaking Aluminum Stewardship Initiative (ASI) certification under ASI's Performance Standard v3 in 2023. Audits of ASI's alignment with this standard, which has heightened expectations around security and conflict, took place at three locations, resulting in certifications at all three sites. Three more locations were fully certified in 2024 and found to be in compliance with the values of the VPSHR.
2. Alcoa's implementation of the VPSHR at our Brazilian locations entailed formally training hundreds of internal and external personnel on the VPSHR, as well as establishing a program for continual training for our Brazilian private security vendor. The tabletop exercise demonstrated that the Alcoa Human Rights Council is fully engaged with the VPSHR values and that we can and are successfully implementing the VPSHR outside of Brazil and into our global operations.