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## **Alcoa Corporation Annual Report to the Voluntary Principles Initiative — 2025**

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### **Introduction and Reporting Scope**

In 2025, Alcoa Corporation (Alcoa) continued implementing the Voluntary Principles Initiative (VPI) across its global operating locations through a risk-based approach aligned with the core expectations of the Voluntary Principles on Security and Human Rights: assessing security and human rights risks, engaging public and private security providers, consulting stakeholders, training security personnel, monitoring performance, and strengthening accountability mechanisms.

Alcoa's 2025 implementation priorities were designed to move the program beyond awareness-building and toward a more mature management-system model. This included integrating VPSHR expectations into security risk assessments, vendor onboarding, post orders, leadership engagement, public security dialogue, grievance management, and recurring assurance activities. This approach supports Alcoa's broader human rights commitments while helping ensure that security practices are consistent, documented, measurable, and capable of continuous improvement.

This report covers Alcoa's implementation activities for the 2025 calendar year and is organized to describe progress against core areas of VPSHR implementation, including commitment, policies and procedures, risk assessment, engagement with public and private security providers, country-level implementation, monitoring and assurance, lessons learned, and priorities for the next reporting cycle.

## **Commitment to the Voluntary Principles**

Alcoa's primary VPSHR implementation focus remained on its Brazilian operations in São Luís, Poços de Caldas, and Jurutí. As previously communicated to the Steering Committee, Alcoa determined that its most significant risks of security-related human rights impacts are at its Brazilian operating locations. Alcoa engages more private security personnel in Brazil than in any other operating region. These private security forces also face the greatest likelihood of managing security-related responses to criminal activity and civil disruption because of higher levels of crime and social disruption compared with other locations under Alcoa's direct management.

Alcoa continued to promote awareness and understanding of the VPSHR across its Brazilian operations in 2025. This included engagement with newly appointed Alcoa Brazil executive leaders and facility leadership teams on the purpose of the VPSHR, Alcoa's human rights commitments, and the importance of consistent implementation at operating locations. Leadership engagement strengthened internal accountability and reinforced the expectation that security activities must be conducted in a manner that respects human rights.

The Alcoa Global Security Team, in conjunction with a third-party consultant, conducted security risk assessments (SRAs) at the ALUMAR, Jurutí, and Poços de Caldas operating locations in Brazil. The assessments were conducted by the Alcoa Chief Security Officer, the LATAM Regional Security Manager, and Northcott Global Solutions (NGS), a London-based third-party risk management firm. The assessments reviewed each location's overall security program, the quality and performance of private security forces, and adherence to VPSHR standards in interactions among private security providers, public security forces, facility personnel, and local communities.

After the SRAs were completed and risks to facility security programs and the Voluntary Principles were identified, the Global Security Department engaged Alcoa's private security vendor, GR, on the VPSHR. GR was the private security contractor for the ALUMAR, Poços de Caldas, and Jurutí operations. The Alcoa Regional Security Manager provided training to the GR executive team on the mission of the VPSHR and Alcoa's commitment to implementing VPSHR standards at its operating locations. GR's executive team was supportive of the Voluntary Principles and committed to assisting Alcoa with implementation. The Alcoa Global Security Department then began developing VPSHR training for all GR managers, supervisors, and security guards assigned to Alcoa locations. The training was developed in Q2 2023 and refined in early 2024. With support from GR leadership, the Regional Security Manager began rolling out the training to GR personnel. Training was delivered at all three locations in Q1 and Q2. In total, Alcoa trained more than 400 private security guards and managers assigned to Alcoa locations. VPSHR private security training has also been incorporated into onboarding for all newly hired private security personnel, ensuring that incoming personnel understand VPSHR standards and Alcoa's commitment to implementation at all operating locations in Brazil.

In addition to engaging with private security providers, the Voluntary Principles call on Alcoa to consult with public security providers about the human rights impacts of Alcoa's security arrangements. In 2025, Alcoa engaged public security forces that support operations at its three Brazil locations. The Alcoa Regional Security Manager established strong, cooperative relationships with the Brazilian Military Police and local authorities in the communities where

Alcoa operates. Because political turnover in 2024 changed regional public security leadership, Alcoa undertook renewed relationship-building and information-sharing on the Voluntary Principles. Alcoa developed a 2025 engagement plan to support regular dialogue with public security providers on use of force and human rights. To date, engagement on the Voluntary Principles has been well received by public security leadership, who have acknowledged the importance of human rights in all security operations on or near Alcoa locations.

### **Policies, Procedures, and Management Systems**

Alcoa's 2025 implementation activities continued to integrate VPSHR expectations into practical security management processes. Key areas of integration included security risk assessments, mitigation tracking, private security onboarding, post orders, recurring training, public security engagement, grievance management, and leadership review. These activities provide the foundation for a repeatable governance model that can be applied to other operating regions based on risk profile, security complexity, and community interface.

### **Stakeholder Engagement and Communications**

Stakeholder engagement remained central to Alcoa's VPSHR implementation approach in 2025. Global Security engaged with facility leadership, management teams, private security personnel, public security providers, External Affairs, Sustainability, and local community stakeholders to support implementation of the VPSHR and to reinforce the connection between security practices, human rights, and community relationships.

As previously noted, the Alcoa Global Security Department focused heavily in 2025 on communicating the mission and purpose of the VPSHR to internal and external audiences, emphasizing why implementation is important and how the VPSHR aligns with Alcoa's commitment to human rights. Alcoa also shared its commitment to the VPSHR with external partners, including mining and metals organizations such as ICMM and ASI. Engagement with the VPSHR has reinforced to these organizations that Alcoa not only shares the values of the Voluntary Principles but is committed to their full implementation across its global operations.

The Alcoa Global Security Department has been encouraged by stakeholders' reception of the Voluntary Principles, including among local management teams, private security partners, and public security partners. Global Security will continue to build on these successes in Brazil in 2025 by promoting the VPSHR with these critical partners. In 2026, the Global Security Department also plans to begin promoting the VPSHR to operations outside Brazil, with a focus on training facility management teams, security management, and security guards in North America, Europe, and Australia.

The Global Security Department has worked successfully in Brazil with the External Affairs and Sustainability Departments to promote Alcoa's human rights program in local communities. This has been accomplished through a strong communications plan delivered to local community leaders and organizations. There remains an opportunity to more clearly incorporate the VPSHR into these community outreach efforts. The Global Security Department will look for opportunities to support external communications by providing guidance on the value of implementing the VPSHR at local operations.

Alcoa will continue strengthening stakeholder engagement by moving from broad awareness-building toward a more structured engagement cycle that documents key stakeholders, frequency

of engagement, issues raised, actions taken, and outcomes achieved. This approach will provide clearer evidence that community concerns and public security risks are considered in security planning, mitigation design, and grievance management.

Lastly, Alcoa continues to make progress in developing a strong global human rights program. This progress was highlighted in late 2025 by the Global Security Department's full support for, and participation in, the global Alcoa Human Rights Council.

### **Risk Assessment Methodology**

Alcoa has taken a two-step approach to security risk evaluation in Brazil, beginning with security risk assessments (SRAs) and validating human rights-related findings through comprehensive ASI certification audits. This approach aligns with VPSHR expectations that companies periodically conduct comprehensive security and human rights risk assessments, evaluate the potential impacts of their security arrangements, and use the findings to develop practical mitigation, monitoring, and assurance measures.

In 2025, the Alcoa Global Security Department, in conjunction with its third-party risk management partner, Northcott Global Solutions (NGS), performed security risk assessments at the São Luís, Poços de Caldas, and Juruti operations in Brazil. Each assessment covered one full week at the location and reviewed the full scope of the security program. Key areas included access controls, security management and policies, security infrastructure and technologies, and associated risks to operations and local communities. The assessments also evaluated potential human rights risks involving private and public security forces. NGS uses an ISO 31000 risk assessment approach. The following provides an overview of the process used for the assessments. Similar SRAs were also completed at Alcoa's North American operations in Louisiana and Indiana.

The NGS Security Risk Assessment process was undertaken in phases. The first phase established the project context, including the operational footprint and the amount and type of risk the organization is prepared to pursue, retain, or accept. The second phase involved developing a critical asset inventory. Critical assets supporting the project were identified across people, physical assets, and information and communications technology. Criticality was determined based on the assets' relevance to human rights, information gathering, and business continuity. Next, risks were identified and assessed. Risks that could affect the project were evaluated by considering the intent and capability of human threat actors, or the potential and capacity of non-human threat actors. Consequences were then assessed against each critical asset, considering the project's attractiveness to identified threats and the effectiveness of existing security controls. Security controls were categorized as protective security controls, which reduce the likelihood of a threat affecting the project, and reactive security controls, which reduce the impact if a threat occurs. Risk analysis used 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.

A further opportunity for strategic alignment is to summarize SRA outputs in a standardized VPSHR risk register that links each identified security and human rights risk to a risk owner, mitigation action, due date, residual risk rating, evidence of completion, and escalation path. This would help demonstrate that risk assessment findings are translated into accountable management actions and reviewed through a consistent governance process.

## **Country Implementation: Brazil**

### **Engagement with Public Security Providers**

Engagement with the Brazilian Military Police and local public security providers remained a primary area of VPSHR implementation in 2025. Public security providers play an important role in maintaining public safety and supporting emergency response in communities where Alcoa operates. Alcoa's Regional Security Manager and facility leadership maintained open lines of communication with local and regional public security leadership and continued to promote awareness of security and human rights considerations relevant to Alcoa's operations.

In 2025, Alcoa conducted quarterly information-sharing sessions among local public security providers, private security contractors, and Alcoa security leads. These sessions included engagement on the VPSHR and were beneficial to all parties. Regular engagement with public security is necessary not only for VPSHR compliance but also for Alcoa's broader security risk management, particularly because public security forces may experience leadership turnover that can create awareness gaps regarding human rights performance within security operations. To strengthen alignment further, these engagements should continue to document key discussion topics, attendance, human rights themes, follow-up actions, and any commitments related to use of force, proportionality, incident response, and respect for community rights.

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).

### **Management of Private Security Providers**

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

expectations that private security providers be carefully selected, contractually managed, trained on human rights standards, supervised, and monitored for performance.

In Brazil, security and human rights risks are present within the private security sector. To manage these risks, Alcoa Global Security, in conjunction with the Procurement Department and Ethics and Compliance Department, developed a mechanism to vet private security providers seeking to do business with Alcoa. Through this screening process, Alcoa identified three private security providers in Brazil that meet its high standards for ethics, human rights, legal compliance, and internal governance. This process was successfully completed in 2025 with the hiring of Prosegur for private security needs at the ALUMAR and Juruti operations and resulted in 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 and continued in 2025 and 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 developed and implemented a detailed Post Order Manual and standard operating procedures that provide clear direction to security guards on how to perform their duties properly and safely on Alcoa property. The Post Orders reinforce the importance of the VPSHR and explain how the standards must be applied to security operations at all Alcoa locations. As previously stated, a key component of this process is ensuring that all private security provider personnel receive VPSHR training on a recurring basis and that all new hires receive VPSHR training before assuming their final assignments at an Alcoa location.

Alcoa will continue embedding VPSHR expectations into private security contracts, onboarding materials, post orders, training requirements, incident reporting procedures, and performance reviews. This will help ensure that VPSHR standards are incorporated into day-to-day security operations and vendor accountability, rather than treated solely as a stand-alone training requirement.

In 2025, significant progress was made in implementing the Voluntary Principles at all Brazilian locations. This challenging process helped Alcoa better understand VPSHR requirements and how they can be implemented effectively at large and remote locations. The VPSHR training materials and processes developed and implemented in Brazil have become the foundation of Alcoa's global VPSHR program. This implementation period also helped Alcoa take the VPSHR message to other operating locations in North America, Europe, Australia, and its joint venture in Guinea. This work will further assist Alcoa in identifying and addressing VPSHR gaps across its global operating locations.

### **Monitoring, Assurance, and Assessments**

As noted above, Alcoa's approach to security risk evaluation includes location-level SRAs conducted by Alcoa personnel with support from NGS, as well as external third-party ASI audits. The NGS SRAs were detailed in scope and used a holistic approach to identify security risks affecting Alcoa personnel and local communities. The SRAs were successfully implemented and generated substantial information on security risks at Alcoa's three Brazilian locations. The SRAs identified a key risk related to civil unrest and demonstrations that could potentially lead to human rights grievances involving community groups and private or public security forces working on or near Alcoa locations. Proposed mitigation strategies based on ISO 31000 protocols are designed to reduce this potential human rights risk from High to Low. Key components of the mitigation strategy include improvements to physical security barriers, access controls, community engagement and communications, training for private and public security forces, including VPSHR training, and procedures for receiving, managing, and resolving community grievances in a timely and fair manner.

Mitigation items identified in the SRAs are tracked monthly by Global Security to help ensure measurable progress. One potential gap in mitigating these risks was ensuring that all relevant Alcoa functional groups were aligned and working together with a unified mission and plan to reduce the risk of human rights grievances. The Global Security Department has worked closely with the External Affairs Department, facility leadership, Sustainability Department, and Crisis Management Teams on these processes and has observed improvement since completion of the SRAs. Going forward, Global Security should continue strengthening the connection between SRA findings, grievance mechanisms, incident reporting, corrective actions, and leadership review so that VPSHR implementation is supported by clear evidence of monitoring, escalation, and continuous improvement.

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 2025, 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.

Together, the SRA process, ASI audit findings, monthly mitigation tracking, and Brazil implementation activities provide a strong foundation for VPSHR assurance. Alcoa will continue working toward a consolidated annual VPSHR performance review that summarizes risk trends, training completion, public and private security engagement, incidents or grievances, mitigation status, audit findings, lessons learned, and priorities for the following year.

### **Lessons Learned and Implementation Challenges**

Alcoa identified Brazil as the operating context with the greatest security-related human rights risk for the company, and therefore prioritized Brazilian operations for initial VPSHR implementation. The size and remoteness of Alcoa's Brazilian operations created implementation challenges, including the need to train more than 400 private security leaders and guards, 50 public security leaders, and 50 internal location leaders. This effort required significant time and coordination from a small Global Security team, the Brazil Regional

Security Manager, and location security superintendents. A key lesson from 2025 is that VPSHR implementation is most effective when integrated into core security management systems, including risk assessment, training, vendor management, community engagement, grievance management, and leadership review.

Alcoa also had the opportunity to see the implementation of the VPSHR produce positive results in 2025. Alcoa successfully managed multiple small environmental protests at its mining operations in Western Australia. Security teams at the mining locations engaged effectively with protestors and ensured they were able to safely express their grievances in a location that did not place protestors or security teams at risk. The protests were small in scale and remained safe and secure for all participants. The Alcoa Human Rights Council and External Affairs Department also held follow-up meetings and communications with protestors and community members to discuss concerns peacefully and develop a shared path to protect the environment while reinforcing Alcoa's commitment to environmental stewardship and community stakeholders. These protest activities highlighted Alcoa's commitment to the Voluntary Principles and to being a good corporate citizen in the areas where it operates.

This experience also demonstrates the value of applying VPSHR principles outside the initial high-priority geography. The Western Australia example should be used as a practical case study for future training because it illustrates proportionate security response, respect for peaceful expression, coordination with External Affairs and human rights governance, and follow-up engagement with stakeholders after security events.

## **Priorities for 2026**

1. Establish a standardized VPSHR governance and reporting process that consolidates SRA findings, mitigation tracking, training completion, public and private security engagement, incidents, grievances, audit results, and lessons learned into an annual performance review.
2. Expand VPSHR implementation beyond Brazil using a risk-based rollout model that prioritizes locations with higher security complexity, greater reliance on private security, or elevated community interface risks.
3. Embed VPSHR expectations into private security contracts, onboarding, post orders, performance management, and incident reporting to strengthen vendor accountability.
4. Continue structured engagement with public security providers, including documentation of dialogue on human rights, use of force, escalation protocols, and community protection.
5. Strengthen coordination among Global Security, External Affairs, Sustainability, Legal, Procurement, Human Resources, Crisis Management, and site leadership to ensure VPSHR risks are addressed through an integrated business process.

## **Implementation Actions Completed in 2025**

### **Selected Implementation Actions**

1. Alcoa began undertaking Aluminum Stewardship Initiative (ASI) certification under ASI's Performance Standard v3 in 2023. Audits assessing alignment with this standard, which includes heightened expectations related to security and conflict, took place at



three locations and resulted in certification at all three sites. Three additional locations were fully certified in 2025 and found to be in compliance with the values of the VPSHR.

2. Alcoa's implementation of the VPSHR at its Brazilian locations included formal training for hundreds of internal and external personnel, as well as the establishment of a continuing training program for its Brazilian private security vendor.