



Alcoa

Policy Advocacy: 2024 Disclosure

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Our Approach to Policy Advocacy

Public policy issues are critical to our business. Alcoa Corporation (“Alcoa” or the “Company”) uses public policy engagement to advocate for positions that advance our strategic priorities, including directly and indirectly through our membership in industry associations and organizations.

Alcoa maintains policies and procedures governing our public policy and engagement process, including political contributions and lobbying activities, that are consistent with our [Code of Conduct and Ethics](#) and support continued compliance with applicable laws and regulations.

Our political engagement is subject to oversight by the Company’s senior and executive management. Executive management provides periodic updates to the Safety, Sustainability and Public Issues Committee of the Alcoa Corporation Board of Directors, which has oversight responsibility of the Company’s political activities and matters of public policy and corporate citizenship, pursuant to its [Charter](#).

Political Activities

POLITICAL CONTRIBUTIONS

Except as otherwise permitted by the Company’s [Political Contributions Policy](#), the Company and its directors, officers, employees, and contractors are prohibited from using Company funds, property, services, or any other thing of value for or in aid of, or in opposition to, (i) any political parties, campaign committees, or candidates for public office, or (ii) any committee, grass roots organization, or other group or organization whose principal purpose is to influence the outcome of a ballot initiative, referendum or other vote of the electorate on a public issue (collectively, “Political Contributions”).

ALCOA CORPORATION EMPLOYEES’ POLITICAL ACTION COMMITTEE (PAC)

Eligible employees of the Company may contribute to the Alcoa Corporation Employees’ Political Action Committee (“PAC”), which is only applicable in the U.S. Employees’ decisions to contribute or not to the PAC is in their sole discretion and carries no risk whatsoever of reprisal regardless of their decision. The PAC is a legal and transparent means to engage eligible employees in the political process, build relationships with bi-partisan candidates who align with Alcoa on business issues, and express united interests with one voice. Consistent with applicable U.S. law, the Company covers certain administrative expenses of the PAC, including employee time to attend PAC board meetings and providing resources and facilities for PAC-focused employee updates and meetings. No Alcoa assets or funds are contributed to the PAC’s account. The PAC is governed by a board that consists of several of the PAC-eligible employees. The PAC board is responsible for the management of all PAC activities, including the approval of all PAC distributions.

As permitted by U.S. and state law, the PAC contributed approximately US\$12,750.00 to the Federal and State committees of individuals running for public office as well as other political committees. Monthly reporting, by year, of the PAC’s contributions is available for review at the website of the U.S. Federal Election Commission (found [here](#)).

Lobbying Activities

DIRECT LOBBYING

In the countries and regions in which the Company operates, we engage with government and regulatory officials on several key issues and emerging risks and opportunities, including the environment, climate, energy, taxes, critical minerals, trade, as well as permitting and licenses. Our public policy advocacy efforts follow applicable laws and rules in each jurisdiction, and we report on those efforts and their expenses as required by law. For example:

- In the United States, the Company discloses its U.S. federal and state lobbying activity and expenditures as required by law. Each quarter Alcoa files form [LD-2](#) to report its federal lobbying expenses to the Office of the Clerk of the House of Representatives and the Secretary of the Senate. Semi-annually Alcoa files form [LD-203](#), its lobbying contribution report.
- In Canada, Alcoa reports to the [Office of the Commissioner of Lobbying](#).
- In Europe, Alcoa reports to the [EU Transparency Register](#).
- In Australia, Alcoa reports to [Lobbyist Register](#).

Alcoa maintains a procedure to identify and screen potential lobbyists. All potential third-party lobbyists are reviewed through the Company's rigorous anti-corruption intermediary process, and strict accounting and compliance procedures facilitate compliance with applicable registration and reporting obligations.

PROCESS

When Alcoa considers that the services of a third-party lobbyist would be necessary and appropriate to assist in legitimate lobbying activities on Alcoa's behalf, the following procedure applies:

The specifics of any proposed lobbyist engagement are reviewed in advance with Alcoa's senior regional management responsible for government relations to determine that the engagement or understanding is consistent with applicable Alcoa policies and procedures to ensure compliance.

- ① Third party lobbyists pass through Alcoa's Intermediary review process prior to commencing any lobbying services.
- ② A lobbying consulting services agreement is entered into with a third-party lobbyist before any services commence. Such agreements will not have a duration longer than one year, though they may be renewed following a review by the appropriate accountable person within the Company.
- ③ All fees and reimbursement of expenses associated with third-party lobbyists or grassroots lobbying campaigns are systematically accounted for in Alcoa's financial statements, enabling the Company to properly report its lobbying efforts and expenses.
- ④ Upon execution of an agreement with any third-party lobbyist or with any group undertaking a grassroots lobbying effort, it is returned to the Company's accountable person, who will provide copies to such other Alcoa departments as appropriate, including the Legal department.

GRASS ROOTS LOBBYING

Grass roots lobbying refers to attempts to influence legislation by affecting the opinion of the public and encouraging the audience to take action with respect to legislation. As a general matter, Alcoa does not engage in grass roots lobbying.

Our Areas of Interest

In 2024, we participated at the national and international levels in industry associations such as the Aluminum Association and the International Aluminium Institute (IAI) among others. (See our [Industry Associations Disclosure section](#)). Apart from providing the Company the opportunity to influence and learn about new policies, as well as regulatory concerns, our public policy advocacy efforts focused broadly on climate, energy and trade.

Climate

As outlined in our [Climate Change Policy](#), Alcoa acknowledges the scientific evidence of climate change reported by the United Nations Intergovernmental Panel on Climate Change (UNIPCC) and the need for an urgent global response. We are committed to support the outcomes of the Paris Agreement and its long-term goals through advocacy and engagement on climate policy, decarbonizing our global operations, producing lower carbon products, and pursuing breakthrough technology innovations in aluminum production. We support legislation and public policy to encourage the development of affordable and reliable low carbon energy needed to enable cost-effective decarbonization of industrial operations.

Alcoa has set an ambition to achieve net zero GHG emissions across our global smelting and refining operations by 2050 for direct (Scope 1) and indirect (Scope 2) emissions with interim targets to achieve a 30 percent reduction by 2025 and a 50 percent reduction by 2030 compared to our 2015 baseline (intensity basis). We also continue to investigate opportunities and evaluate the feasibility of science-aligned Scope 3 targets and reductions within our value chain (See our [2023 Sustainability Report](#)).

Our approach to climate change therefore requires our industry associations to acknowledge the scientific evidence of global warming reported over time by the UNIPCC and to advocate for the policies required to meet the goals of the Paris Agreement. We engage with industry associations that are aligned with the Paris Agreement's goals and objectives, such as the International Aluminium Institute (IAI), European Aluminium Association, Brazilian Aluminum Association, Australian Aluminium Council, Aluminium Association of Canada, and the Aluminum Association in the United States.

Energy

Alumina refining and aluminum smelting processes are energy intensive by nature. This requires access to energy that is reliable, affordable and in line with our decarbonization ambition.

Our current path to achieve our stated ambition includes continuing to increase the use of renewable energy in our operations, identifying potential decarbonization opportunities within our portfolio of operating assets continuing to identify and implement energy efficiency projects, and developing new technologies that have the potential to unlock decarbonization on a larger scale. Alcoa's new technologies under development include inert anode technology (ELYSIS™), post-consumer scrap purification process (ASTRAEA™) and zero-carbon alumina refining (Refinery of the Future™) (see our [Products page](#)).

With our industry associations, we expect any positions and advocacy to promote access to affordable renewable energy and decarbonization investments in low carbon energy.

Trade

We believe that a thriving global marketplace depends on balanced trade regulations at both national and international levels. We work with our industry associations to level the global playing field for our industry and, where necessary, through the enforcement of effective trade defense instruments such as anti-dumping measures or unilateral duties. We also work with our industry associations to ensure any protective measures achieve their goals of creating a fairer system of trade.

Industry Associations Disclosure

Alcoa belongs to and actively participates in various trade associations and organizations around the world to understand, exchange ideas about, and seek to manage risks associated with changing government policies and legal landscapes.

These associations play an important role in the aluminum industry and provide the Company another channel to engage in the legislative and regulatory process and influence matters that impact the industry.

Alcoa participates in industry associations where membership provides value to our business and key stakeholders. Though each association is different, Alcoa prioritizes:

- Opportunities to understand a range of views on issues affecting our industry
- Engagement opportunities with our peers and customers across the industry
- Sharing best practice and technical insights
- Providing input to the development of industry standards
- Sharing the Company's position on particular issues and perspectives
- Opportunities to enhance industry practices and the regulatory landscape
- Access to insights, subject-matter expert knowledge and collaborative support on business-critical issues

Accountability

Overseeing the relationship with each industry association includes the following responsibilities:

- **Policy alignment:** Strive to align the association's policy positions with those of Alcoa.
- **Regular engagements:** Maintain consistent engagement with the association and providing updates on their activities to Alcoa.
- **Periodic reviews:** Conduct a periodic evaluation of industry association membership and policy alignment.

In some instances, members of our executive team sit on industry association boards or executive committees. These roles offer additional opportunities to gain membership advantages as previously outlined, while it does not alter Alcoa's approach compared to being a regular member.

Review process

We recognize that not all industry associations' views may be fully aligned with the Alcoa's views. As such, Alcoa conducts an annual periodic evaluation of our industry association memberships and policy alignment.

Where significant differences in policy positions arise, we may provide greater clarity on our own positions and work to share our position in the association. If differences remain significant, Alcoa will take the following steps:

1. Initial engagement: Discuss our position with the association's leadership and gain further clarity into theirs.

2. Opportunity for alignment: Identify opportunities to align our positions and reach mutual understanding to resolve the issue.

3. Escalation: If no resolution is achieved within an appropriate timeframe, escalate the issue to the Chief External Affairs Officer.

4. Membership review: If the misalignment is substantial and persists, alternative actions will be considered, including the suspension or termination of Alcoa's membership.

Industry Associations Participation

In recognition of the interest in our memberships with industry associations, particularly their policy advocacy roles, we are committed to maintaining transparency and continuous oversight of these affiliations by disclosing, on annual basis, relevant information pertaining to our top 10 industry association memberships, including details on each association, its key priorities and goals, and our annual financial contributions.

This enables our stakeholders to thoroughly review our memberships and to address any questions or concerns they may have.

Below are the top ten industry associations of which Alcoa is a member, by membership dues for 2024.

Industry Associations	Jurisdiction	Rationale	2024 Total Membership Dues, USD*
Aluminum Association of Canada	Canada	Brings together Canada's three primary aluminum producers (Alcoa, Aluminerie Alouette, and Rio Tinto). The organization represents the industry to the general public, public authorities, aluminum users, and key environmental and economic stakeholders.	584,000
US Aluminum Association	U.S.	The Association represents the aluminum value chain in the US, as well as suppliers to the industry- this segment includes almost 70% of all aluminum products shipped in North America. The Association works to support a growing and competitive U.S. aluminum industry, develop standards, and conduct business intelligence and sustainability research geared towards important stakeholders.	457,000
Western Australia Chamber of Minerals and Energy	Australia	CMEWA is the representative body of the resources sector in Western Australia. The organization works on policy issues. They support the competitiveness of the resources sector in WA and allow the industry to speak with a unified voice. Key priorities include research activities, occupational health and safety, education and training, environment, exploration, Indigenous affairs, the economy, infrastructure, tax, and workforce development.	387,000
Brazil Aluminum Association (ABAL)	Brazil	ABAL provides a common forum to discuss relevant topics to the industry, including primary and downstream users. The goal of the organization is to increase the representation and communication of key industry positions.	327,000

International Aluminium Institute (IAI)	International	IAI membership is comprised of global bauxite, alumina, and aluminum companies from all of the major production regions of the world. IAI is responsible for gathering industry data to generate relevant insights and to inform the public. The purpose of the organization is to promote the sustainable development of the aluminum industry and to increase demand for aluminum products by raising awareness of their unique and valuable properties.	259,000
European Aluminium Association	Europe	European Aluminium represents Europe's metals value chain. Membership is comprised of primary aluminum producers, downstream manufacturers of extruded, rolled, and cast aluminum, producers of recycled aluminum and national aluminum associations. Key workstreams include policy work, especially related to climate change, the energy system and decarbonization. The organization also conducts research of relevance to the industry and works on standards and lifecycle assessments.	219,000
International Council on Metals and Mining (ICMM)	International	ICMM is a CEO-led leadership organization with the goal of improving sustainable development across the mining and metals industry. The mission of ICMM is to create a safe, just, and sustainable world with responsibly produced metals and minerals.	199,000
Brazilian Association for Self-Energy Producers (ABIAPE)	Brazil	ABIAPE is focused on promoting the interests of energy electricity self-producers. ABIAPE works to increase the competitiveness, social perception and supply security of energy generation in Brazil.	197,000
Australian Aluminium Council	Australia	This organization represents the Australian aluminum industry at the national level. The council aims to increase understanding of the aluminum industry in Australia and beyond. The organization also encourages the growth of the industry and acts as the focal point on issues such as climate change, energy, trade, health and the environment. Through its technical group, the Council develops and maintains material specifications, standards, and other technical data.	175,000
Icelandic Aluminum Association (SAMAL)	Iceland	SAMAL was founded by Rio Tinto Iceland, Norðurál and Alcoa Fjarðarál. SAMAL as an organization is a member of European Aluminium and World Aluminium. The organization promotes the development of the Icelandic aluminum industry. They educate and facilitate information around the industry. Members of SAMAL are also required to join the Federation of Icelandic Industries.	142,000



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