LME submission 2024, 2023 calendar year data

Section 1 Brand Information

LME Brand Producer name	Producer 'X'
LME Brand name(s)	A, B, C, D, E, F, G, H
Address of Brand producing site	

Section 2

2a. Describe the Company's Management Systems

Producer 'X's Responsible Sourcing Framework (Framework) is an intelligence and risk-based decision framework which integrates the management and improvement of ESG performance into our Source to Contract, Supplier Relationship Management and contract lifecycle of our inbound supply chain commercial activities process. Identifying ESG risk and providing a structure to remediate and/or improve ESG performance.

The purpose of the Framework is to develop the supply chain required to reinvent the aluminium industry for a sustainable future, fostering the supplier relationships required to Advance Sustainably.

Our Standard Operating Procedure XXX (SOP) outlines the Responsible Sourcing Framework, defines responsibilities and program governance. Supporting the SOP is our Human Rights Policy, Indigenous People policy, Social Policy, Security Policy, Code of Conduct and Integrity Line.

We have 5 program partners supporting the Framework:

- Partner Service A – providing ESG risk screening, auditing and monitoring, Partner Service A uses a suite of intelligence sources to assess not only country and industry risk but also 21 ESG criteria. As part of the IQ screening algorithm country risk is assessed utilising databases such as the Corruption Perceptions Index combined with Partner Service A's extensive knowledge base. The 21 ESG criteria are summarised as follows:
    - Environment - Energy consumption and greenhouse gasses; Water; Biodiversity; Local and accidental pollution; Material, chemicals and waste; Product use; Product end-of-life; Customer health and safety; Environmental Services and advocacy
    - Human Rights - Employee Health and Safety; Working conditions; Social dialogue; Career management and training; Child labour, forced labour and human trafficking; Diversity, discrimination and harassment; External stakeholder human rights
    - Ethics – Corruption; Anticompetitive practices; Responsible Information Management
    - Sustainable Procurement - Supplier environmental practices; Supplier social practices
- Partner Service B – anti-bribery and corruption screening.
- Partner Service C – denied parties and sanction screening.
- Partner Service D - Maritime Observation System and platform providing vessel traceability and due diligence

Outlined in our Supplier Standards, the external facing element of the Framework is the Supplier Sustainability Program (SSP).

The SSP consists of three key pillars:

1. Assess – the assessment of our supply chain and supply chain source materials, against the ESG risks of Governance, Human Rights, Modern Slavery, Social and Environmental Impact. Suppliers are scored and monitored based on publicly available data, country risk, commodity risk.
2. Audit – to verify implementation, provide due diligence, and increase transparency. Supplier desk top audits and analysis provided through Partner Service A.
3. Advance – Working with out supply chains and Suppliers though improvement plans, setting key performance objectives and developing strategic partnerships to manage risk and create long-term value. Suppliers who score below 25 on their desktop audit are required to complete a corrective action plan and reassess within 12 months. Selected Suppliers are invited to participate in the field audit program.

Traders, Intermediaries and Scrap Suppliers undertake due diligence through Partner Service B.

All Suppliers are loaded into our Supplier Information Management (SIM) platform as part of the on boarding process. Here denied parties, sanctions screening and beneficial ownership is continuously screened and monitored through a Partner Service. Shipments are monitoring through Partner Service's, here vessel loading, discharge and tonnage information is available. Mineral origin data is manually collected and mapped per supplier for key raw materials.

The Program is governed by the Procurement PMO structure, tracked against the following KPIs:

- >95% of all Supplier's Assessed.
- All high-risk suppliers to complete further due diligence Ratings Assessment.
- >60% of Suppliers to improve Assessment Rating on reassessment.
- All Suppliers with a Rating <25 working on Corrective Action Plans.
- X (number set each year) of field audits.
- Regionally specific Inclusion & Diversity metrics.

The Program is reviewed for effectiveness through our annual reporting process (ie. Annual Sustainability Report and regional Modern Slavery Statements), 3 yearly ASI Performance Standard and Chain of Custody Audits, and third-party Human Rights Audits.

b) Describe how this policy been communicated to suppliers, employees, and the public

The SSP is outlined in our Supplier Standards. The Supplier Standards are publicly available on our website and form part of the tender documentation provided to suppliers through our ERP. Major updates are electronically communicated through our distribution list. Performance of the SSP is communicated publicly through our Annual Sustainability Report, and global Modern Slavery Statements.

New employees receive onboarding training, with annual training modules delivered on both the Responsible Sourcing Procurement and Chain of Custody. All training is available on demand through our Procurement University.

c) Explain the management structure responsible for the Producer's due diligence, including who is directly responsible for implementing the supply chain due diligence policy

Accountability for the Framework sits with the Chief Procurement Officer/ Vice President Procurement, and responsibility for the execution and management of the program is with the Director Responsible Sourcing (Global Procurement).

The Responsible Sourcing department comprises of 1 director, 1 direct report, 1 intern and an agile team of 10 champions embedded in regional sourcing teams, and 4 auditors for the field audits.

d) Describe the system of controls and transparency over the mineral supply chain put in place by the Producer. This includes:

a. the type of information the Producer collects from suppliers,

b. whether this information is required in commercial contracts with suppliers

c. the format of the record-keeping of the Producer (such as paper-based, computerised, digital leger technology, or part of an institutionalised mechanism)

and d. for how long this information is stored

ESG related information for the purposes of the Program is collected and managed by our Program Partners. Each of our Program Partners has their own Data Privacy Standards, and through our contracts are required to be compliant with regional legislation (as applicable). Record keeping is digital, and Partner Service A for example retain supplier data for 5 years past the end of the contractual relationship between Partner Service A and that Supplier.

Producer 'X' retains summarised data to support our annual disclosures.

e. Describe the data the management system has yielded this Reporting Period and how it has strengthened the company's due diligence efforts

The data collected through our Program Partners forms the criteria for ESG risk determination and location mapping by our Program Partners which informs the further due diligence measures to be taken. Location mapping allows us to understand the location our Tier 1 supply chain and subsidiaries, risk determination allows us to segment our supply chain and develop strategies to address specific ESG criteria. Partner Services assessment and Partner Service Audits provide insights into specific indicators to determine ESG maturity and inform contract KPIs and management. Partner Service's ongoing screening alerts us to sanctions changes and other ESG concerns providing a dynamic scoring ensuring that risk assessments are continuous and triggers for further due diligence are not just annual. Introduced in 2023 our field audit program involves conducting field audits of selected suppliers. The field audit program provides a ground level audit of a suppliers actions, policies and treatment of employees, and aims to work with the supplier to improve their Partner Service Ratings score, identify any modern slavery red flag, and advance broader sustainability efforts.

f. Confirm that a company-level or industry-wide grievance mechanism has been established and provide evidence

Producer 'X' operates a global Integrity Line. The Integrity Line is referenced on our website, in our Code of Conduct and Supplier Standards..

g. Describe the Producer's method for identifying Conflict-Affected and High-Risk Areas ("CAHRA")

CAHRAs are identified as part of our SSP in the Assess stage through Partner Service A. Partner Service A uses among others sources the Corruptions Perception Index to determine a country risk rating for Suppliers and subsidiaries. Partner Services B utilises their International Bribery and Corruption Index. Further we map and monitor key raw materials utilizing Partner Service data, and overlay that with the CAHRA list published by the European Commission CAHRAs (cahraslist.net).

Brand A - B RFA workbook

	Country identification			Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation			
Question from RFA	3.a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.	3.b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.	3.c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.	3.d. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	3.e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.	3.f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.	3.g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps			Additional comments
Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.	
Bauxite	Brazil	Source	Bauxite	Non CAHRA	Yes	No	No	NA	The Company is a signatory to the EITI and as such discloses payments to the governance in our relevant operating countries. The Company discloses financial performance and government payment in our Annual Report and Annual Sustainability Report. Through the SSP all suppliers are assessed and monitored through our. program partners for red flags associated with money laundering, fraud, corruption, compliance, organized crime, sanctions, embargos and associated regulatory and reputational risks. Jamaica supplier note - whilst the supplier entity does not produce its own financial disclosures the private corporation joint venture partners do, and with this disclose financials in relation to the Jamaican operations. Historical data and on government revenues generated from bauxite operations can be searched but generally lags. The government has the Jamacia Bauxite Institute which monitor production, employment and environment performance, so enforcement of environment performance is action by the institute.	
	Jamaica	Source	Bauxite	Non CAHRA	Yes	No	No	NA		
	Australia	Source	Bauxite	Non CAHRA	Yes	No	No	NA		
Alumina	Australia	Source	Alumina	Non CAHRA	Yes	No	No	NA		
	Brazil	Source	Alumina	Non CAHRA	Yes	No	No	NA		
	USA	Source	Alumina	Non CAHRA	Yes	No	No	NA		
	Canada	Transit	Alumina	Non CAHRA	NA	No	NA	NA		

Question from RFA	4.a. Indicate where the Relevant Companies have operated in or sourced minerals during the Reporting Period.	4.b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.	4.c. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	4.d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.
Clarification of required answers	Please enter the country name.	Please enter "No Mineral Production" or "Mineral Production"	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA".	
	Brazil	Mineral Production	No CAHRAs	
	Australia	Mineral Production	No CAHRAs	
	Canada	Mineral Production	No CAHRAs	
	United States	Headquarters	No CAHRAs	
	United States	Mineral Production	No CAHRAs	
	Jamacia	Mineral Production	No CAHRAs	

Brand C RFA workbook

	Country identification			Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation			
Question from RFA	3.a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.	3.b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.	3.c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.	3.d. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	3.e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.	3.f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.	3.g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps			Additional comments
Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.	
Bauxite	Brazil	Source	Bauxite	Non CAHRA	Yes	No	No	NA	The Producer is a signatory to the EITI and as such discloses payments to the governance in our relevant operating countries. The Producer discloses financial performance and government payment in our Annual Report and Annual Sustainability Report. Through the SSP all suppliers are assessed and monitored through our program partners for red flags associated with money laundering, fraud, corruption, compliance, organized crime, sanctions, embargos and associated regulatory and reputational risks. Jamacia supplier note - whilst the supplier entity does not produce its own financial disclosures the private corporation joint venture partners do, and with this disclose financials in relation to the Jamaican operations. Historical data and on government revenues generated from bauxite operations can be searched but generally lags. The government has the Jamacia Bauxite Institute which monitor production, employment and environment performance, so enforcement of environment performance is action by the institute.	
	Jamacia	Source	Bauxite	Non CAHRA	Yes	No	No	NA		
	Australia	Source	Bauxite	Non CAHRA	Yes	No	No	NA		
Magnesium	United States	Source	Magnesium	Non CAHRA	Yes	No	No	NA		
Alumina	Brazil	Source	Alumina	Non CAHRA	Yes	No	No	NA		
	Australia	Source	Alumina	Non CAHRA	Yes	No	No	NA		
	United States	Source	Alumina	Non CAHRA	Yes	No	No	NA		

Question from RFA	4.a. Indicate where the Relevant Companies have operated in or sourced minerals during the Reporting Period.	4.b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.	4.c. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	4.d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.
Clarification of required answers	Please enter the country name.	Please enter "No Mineral Production" or "Mineral Production"	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA".	
	Brazil	Mineral Production	No CAHRAs	
	United States	Headquarters, Mineral Production	No CAHRAs	
	Jamacia	Mineral Production	No CAHRAs	
	Australia	Mineral Production	No CAHRAs	

Brand D RFA workbook

	Country Identification			Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation			
Question from RFA	1.a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.	1.b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.	1.c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.	1.d. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	1.e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.	1.f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.	1.g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps			Additional comments
Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.	
Bauxite	Guinea	Source	Bauxite	Non CAHRA	Yes	No	Yes	Yes	The Producer is a signatory to the EITI and as such discloses payments to the governance in our relevant operating countries. The Producer discloses financial performance and government payment in our Annual	
Alumina	Spain	Source	Alumina	Non CAHRA	Yes	No	No	Yes	Report and Annual Sustainability Report. Through the SSP all suppliers are assessed and monitored through our program partners for red flags associated with money laundering, fraud, corruption, compliance, organized crime, sanctions, embargos and associated regulatory and reputational risks. Through the EcoVadis Ratings Audit suppliers are identified if they are EITI members and are monitored for compliance. Guiena's EITI performance and the suppliers disclosures are referenced here https://eiti.org/documents/guinea-2021-eiti-report notably pages 71, 79 and 80.	

Question from RFA	4.a. Indicate where the Relevant Companies have operated in or sourced minerals during the Reporting Period.	4.b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.	4.c. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	4.d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.
Clarification of required answers	Please enter the country name.	Please enter "No Mineral Production" or "Mineral Production"	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA".	
	Spain	Mineral Production	No CAHRAs	
	Guinea	Mineral Production	No CAHRAs	
	United States	Headquarters	No CAHRAs	

Brand E RFA workbook

	Country Identification			Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation			
Question from RFA	1.a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.	1.b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.	1.c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.	1.d. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	1.e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.	1.f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.	1.g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps			Additional comments
Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.	
Bauxite	Guinea	Source	Bauxite	Non CAHRA	Yes	No	Yes	Yes	The Producer is a signatory to the EITI and as such discloses payments to the governance in our relevant operating countries. The Producer discloses financial performance and government payment in our Annual Report and Annual Sustainability Report. Through the SSP all suppliers are assessed and monitored through our program partners for red flags associated with money laundering, fraud, corruption, compliance, organized crime, sanctions, embargos and associated regulatory and reputational risks. Through the EcoVadis Ratings Audit suppliers are identified if they are EITI members and are monitored for compliance. Guiena's EITI performance and the suppliers disclosures are referenced here https://eiti.org/documents/guinea-2021-eiti-report notably pages 71,79 and 80.	
Alumina	Spain	Source	Alumina	Non CAHRA	Yes	No	No	Yes		
	Germany	Source	Alumina	Non CAHRA	Yes	No	Yes			
	Norway	Transit	Alumina	Non CAHRA	NA	No	NA			

Question from RFA	4.a. Indicate where the Relevant Companies have operated in or sourced minerals during the Reporting Period.	4.b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.	4.c. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	4.d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.
Clarification of required answers	Please enter the country name.	Please enter "No Mineral Production" or "Mineral Production"	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA".	
	Spain	Mineral Production	No CAHRAs	
	Norway	Mineral Production	No CAHRAs	
	Guinea	Mineral Production	No CAHRAs	
	United States	Headquarters	No CAHRAs	
	Germany	Mineral Production	No CAHRAs	

Brand F RFA workbook

		Country identification		Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation			
Question from RFA	1.a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.	1.b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.	1.c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.	1.d. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	1.e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.	1.f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.	1.g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps			Additional comments
Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.	
Bauxite	Australia	Source	Bauxite	Non CAHRA	Yes	No	No	NA	The Producer is a signatory to the EITI and as such discloses payments to the governance in our relevant operating countries. The Producer discloses financial performance and government payment in our Annual Report and Annual Sustainability Report. The Indonesian supplier identified publishes an annual sustainability report which outlines, economic value including Taxes and community investment. Suppliers are responsible for their meeting the reporting and disclosure requirements of the countries they operate in. Through the SSP all suppliers are assessed and monitored through our program partners for red flags associated with money laundering, fraud, corruption, compliance, organized crime, sanctions, embargos and associated regulatory and reputational risks.	
	Indonesia	Source	Bauxite	Non CAHRA	Yes	No	No	NA		
Alumina	Australia	Source	Alumina	Non CAHRA	Yes	No	No	NA		
	Indonesia	Source	Alumina	Non CAHRA	Yes	No	No	NA		

Question from RFA	4.a. Indicate where the Relevant Companies have operated in or sourced minerals during the Reporting Period.	4.b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.	4.c. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	4.d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.
Clarification of required answers	Please enter the country name.	Please enter "No Mineral Production" or "Mineral Production"	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA".	
	Australia	Mineral Production	No CAHRAs	
	United States	Headquarters	No CAHRAs	
	Indonesia	Mineral Production	No CAHRAs	

Brand G RFA workbook

	Country identification			Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation			
Question from RFA	3.a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.	3.b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.	3.c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.	3.d. Classify each country's Conflict Affected or High-Risk Area ("CAHRA") status.	3.e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.	3.f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.	3.g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps			Additional comments
Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.	
Bauxite	Brazil	Source	Bauxite	Non CAHRA	Yes	No	No	NA	The Producer is a signatory to the EITI and as such discloses payments to the governance in our relevant operating countries. The Producer discloses financial performance and government payment in our Annual Report and Annual Sustainability Report. Through the SSP all suppliers are assessed and monitored through our program partners for red flags associated with money laundering, fraud, corruption, compliance, organized crime, sanctions, embargos and associated regulatory and reputational risks. Through the EcoVadis Ratings Audit suppliers are identified if they are EITI members and are monitored for compliance.	
Alumina	Brazil	Source	Alumina	Non CAHRA	Yes	No	No	NA		

Question from RFA	4.a. Indicate where the Relevant Companies have operated in or sourced minerals during the Reporting Period.	4.b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.	4.c. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	4.d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.
Clarification of required answers	Please enter the country name.	Please enter "No Mineral Production" or "Mineral Production"	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA".	
	Brazil	Mineral Production	No CAHRAs	
	United States	Headquarters	No CAHRAs	

Brand H RFA workbook

	Country identification			Red Flag 1	Red Flag 2	Red Flag 3	EITI Implementation			
Question from RFA	3.a. On the basis of the Producer's Company Management Systems for tracing the transit of materials from its operations and those of its suppliers, list all countries from which the minerals used for this Brand originated and transited through during the Reporting Period.	3.b. Identify whether each of the countries listed in (a.) is a source for the Brand material or a country through which the material only transits.	3.c. Specify the type of material being sourced or transited. This is optional to disclose and only requested to assist in answering the remaining questions.	3.d. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	3.e. For each of the source countries identified, assess if the volume of mineral the Producer sourced during the Reporting Period is in keeping with the source country's known reserves and expected production levels. Provide the result of your assessment.	3.f. For each of the countries identified, assess if this country known to transit materials from CAHRAs.	3.g. For each of the source countries in (b.), assess the status of the supplier's Extractive Industry Transparency Initiative ("EITI") implementation following these steps			Additional comments
Clarification of required answers	Please enter the country name.	Please enter "Source" or "transit only".	Optional: you may enter the type of material sourced if desired.	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA". For "Some CAHRAs", provide specific region in comments column K.	For source countries only: Please enter Yes or No for source countries and NA for transit only countries.	For all countries: Please enter Yes if known to transit materials from CAHRAs or No if not.	For source countries only: (i) State whether or not the country is an EITI-implementing country. Please enter Yes or No for source countries and NA (Not Applicable) for transit only countries.	For source countries only: (ii) If the supplier is located in an EITI-implementing country, identify if the supplier is in compliance with the EITI reporting requirements of that country. Provide links to the relevant company's submission for the purpose of EITI reporting, where such a disclosure does not reveal commercially sensitive information.	For source countries only: (iii) If the country is not an EITI-implementing country, identify if the supplier takes other steps to provide transparency on payments to governments and other matters in line with the aims of EITI. Provide link(s) to disclosures where available.	
Bauxite	Brazil	Source	Bauxite	Non CAHRA	Yes	No	No	Yes	The Producer is a signatory to the EITI and as such discloses payments to the governance in our relevant operating countries. The Producer discloses financial performance and government	
	Jamacia	Source	Bauxite	Non CAHRA	Yes	No	No	NA		
	Australia	Source	Bauxite	Non CAHRA	Yes	No	No	NA		
Alumina	Brazil	Source	Alumina	Non CAHRA	Yes	No	No	Yes, Alcoa level		
	Australia	Source	Alumina	Non CAHRA	Yes	No	No	NA		
	United States	Source	Alumina	Non CAHRA	Yes	No	No	NA		
	United States	Transit	Alumina	Non CAHRA	NA	No	NA			

Question from RFA	4.a. Indicate where the Relevant Companies have operated in or sourced minerals during the Reporting Period.	4.b. Classify the locations provided in (a.) into either locations where no minerals are produced (such as headquarters, offices, or holding companies) or locations where minerals are produced.	4.c. Classify each country's Conflict-Affected or High-Risk Area ("CAHRA") status.	4.d. If any CAHRAs are identified, provide confirmation that the Producer has secured evidence that the origin or transit of the material entering their feedstock was not sourced from the CAHRA that raised the OECD supplier red flag and that the Relevant Company has strong company-wide due diligence management systems.
Clarification of required answers	Please enter the country name.	Please enter "No Mineral Production" or "Mineral Production"	Please enter country CAHRA evaluation as "No CAHRAs", "Some CAHRAs", or "All CAHRA".	
	Brazil	Mineral Production	No CAHRAs	
	United States	Headquarters, Mineral Production	No CAHRAs	
	Australia	Mineral Production	No CAHRAs	
	Jamacia	Mineral Production	No CAHRAs	

Appendix 1: Attachments

1. Human rights policy
2. Indigenous peoples policy
3. Social policy
4. Security policy
5. Code of conduct
6. Integrity line
7. Ecovadis rating
8. Supplier standards