HARASSMENT AND BULLYING FREE WORKPLACE POLICY

This policy applies worldwide to Alcoa and its subsidiaries, affiliates, partnerships, ventures and other business associations that are effectively controlled by Alcoa, directly or indirectly (together the "Company"), and all directors, officers and employees of the Company.

Alcoa seeks to provide a trusting workplace that is safe, respectful and inclusive of all individuals and that is free from harassment, bullying, offensive or disrespectful conduct. This is the foundation of our Care for People value.

This is a global policy that covers harassment and bullying which occurs both in and out of the workplace, such as on business trips, or at work-related events or social functions, written communications, or is in violation of our Social Media Policy. It covers harassment, microaggressions and bullying behavior by or towards employees, contractors, vendors, customers, suppliers or visitors. Our Company complies with all country and local laws prohibiting harassment, and our Code of Conduct prohibits harassment in the workplace. Violations will not be tolerated and may result in disciplinary action or termination of employment.

While the legal definition of harassment and bullying may vary by country or local jurisdiction, the following non-exhaustive list of behaviors are unacceptable and in violation of this policy:

- Microaggressions
- Intimidating or threatening behavior, verbal or physical
- Degrading comments or jokes
- Showing disrespect towards others because of individual characteristics
- Sending or displaying material that is offensive or pornographic (including emails, texts, instant messages or pictures)
- Racial, ethnic, gender, religious, homophobic or age-related derogatory remarks
- Sexual harassment

It is important to remember that harassment is determined by the impact actions have on others. Ideally, those impacted or those witnessing a concern, share this feedback at the time it happens which creates an opportunity for a respectful response once the impact is known.

If you experience or witness behavior that you feel is offensive, harassing or bullying, we rely on you to report these concerns to ensure that we operate in accordance with our values, policies and code of conduct. Alcoa's Anti-Retaliation Policy expressly prohibits retaliation against anyone who reports an incident in good faith. Concerns will be promptly, impartially, and confidentially investigated and acted upon.

Everyone at Alcoa has a right to feel safe and respected at work and we all have a responsibility to speak up and act when we see something that conflicts with the Company's Values, Equal Employment Opportunity Policy, or Code of Conduct.

WHERE TO DIRECT QUESTIONS OR REPORT CONCERNS

Contact Alcoa's Integrity Line to seek advice or raise a concern.