

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# CONSTELLIUM

## AS&I EXTRUSION SINGEN, CONSTELLIUM AUTOMOTIVE STRUCTURES GOTTMADINGEN AND DAHENFELD

CERTIFICATE  
NUMBER

99

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI  
ACCREDITED  
AUDITOR

GUTCERT  
(AFNOR  
GROUP)

DATE OF ISSUE

22 OCTOBER 2020

DATE OF EXPIRY

21 OCTOBER 2023

CERTIFIED SINCE

22 OCTOBER 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

Extrusion plant of Constellium Singen (Germany)  
and Automotive Structure production sites of  
Gottmadingen (Germany) and Dahenfeld  
(Germany).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium AS&I Extrusion Singen, Constellium Automotive Structures Gottmadingen and Dahenfeld
CERTIFICATION SCOPE	Extrusion plant of Constellium Singen (Germany) and Automotive Structure production sites of Gottmadingen (Germany) and Dahenfeld (Germany)
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Semi-Fabrication</li><li>• Material Conversion (Industrial Users)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Certification Audit</li></ul>
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none"><li>• 20 July . 22 July 2020</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 22 September 2020</li></ul>
AUDIT SCOPE	<p>The Audit Scope includes the extrusion plant of Singen AS&amp;I, and the two downstream plants of Dahenfeld and Gottmadingen manufacturing car components from extruded profiles. Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Semi-Fabrication</li><li>• Material Conversion (Industrial Users)</li></ul> <p>All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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- The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
  - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD      22 October 2020 . 21 October 2023

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NEXT AUDIT TYPE              Re-Certification Audit

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NEXT AUDIT DATE              21 October 2023

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CERTIFICATION NUMBER      99

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented processes (including a legal register) which allow adequate awareness of legal requirements and which shall ensure compliance with Applicable Laws and regulations. Legal developments are systematically monitored and competent legal advice is available (Corporate supports the site with legal counsel). The Entity holds ISO 14001, ISO 50001 and OHSAS 18001 Certifications from an accredited Certification body.
1.2 Anti-Corruption	Conformance	The Entity has a system in place against corruption which is adequate to the size and nature of its business. Among the instruments, there is a Code of Conduct issued and communicated internally and externally. The Entity has provided training to employees with regards to business ethics. Corporate headquarter operates a whistleblowing hotline where potential breaches or suspected corruption can be reported confidentially. The financial system is periodically audited by an external tax Auditor. The corporation reports periodically on anti-corruption in its annual Sustainability Report. A copy of the latest Sustainability Report can be found via the following link: <a href="https://www.constellium.com/sustainability/downloads/brochures-reports">https://www.constellium.com/sustainability/downloads/brochures-reports</a> .
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance. Constellium's group Code of Conduct can be accessed via the link below: <a href="https://www.constellium.com/sites/default/files/Sustainability/Codeofconduct/constellium_codeofconduct-2019-en-web.pdf">https://www.constellium.com/sites/default/files/Sustainability/Codeofconduct/constellium_codeofconduct-2019-en-web.pdf</a> . Their supplier Code of Conduct is available via this link: <a href="https://www.constellium.com/sites/default/files/Sustainability/en_constellium_supplier_code_of_conduct_final.pdf">https://www.constellium.com/sites/default/files/Sustainability/en_constellium_supplier_code_of_conduct_final.pdf</a> .
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains policies consistent with the requirements of the ASI Performance Standard (see: <a href="https://www.constellium.com/sustainability/downloads/policies-codes-conduct">https://www.constellium.com/sustainability/downloads/policies-codes-conduct</a> to access the corporate EHS- and Human Rights Policies. The Policies are subject of periodic employee training. The site holds Certificates according ISO 14001, ISO 50001 and OHSAS 18001 from an accredited Certification body which is current for the Entity's Certification Scope. Copies of the Certificates can be downloaded via the link below: <a href="https://www.constellium.com/sites/default/files/certifications/constellium_singen_certificates_english_0.zip">https://www.constellium.com/sites/default/files/certifications/constellium_singen_certificates_english_0.zip</a> .

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard as well as the Entity's own Environmental, Energy and Health & Safety Management System, the Entity has senior management endorsement and support through provision of resources and regularly reviews the policies. The Entity obtained ISO 14001, ISO 50001 and OHSAS 18001 Certifications which are consistent with their ASI Certification Scope.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated the policies internally and externally as appropriate (company website, intranet, postings). The Constellium Corporate supplier Code of Conduct is actively communicated to their suppliers. A copy of the corporate policies can be found via the following link: <a href="https://www.constellium.com/sustainability/downloads">https://www.constellium.com/sustainability/downloads</a> .
2.2 Leadership	Conformance	The Entity's plant manager has the overall responsibility and authority for ensuring conformance with this Standard and to ensure sufficient resources to support the implementation of the Standard. He is supported by his local team as well as by the corporate sustainability team.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an accredited Management System covering Environment, Energy, Health & Safety H&S (ISO 14001, ISO 50001, OHSAS 18001, copies of the Certificates can be downloaded via the link: <a href="https://www.constellium.com/sites/default/files/certifications/constellium_singen_certificates_english_0.zip">https://www.constellium.com/sites/default/files/certifications/constellium_singen_certificates_english_0.zip</a> .
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented a Management System on social aspects. It is not certified but appears correctly implemented during the Audit. For health and safety aspects, the Entity has documented and implemented a specific management system according to OHSAS 18001. This system is Certified by an accredited certification body.
2.4 Responsible Sourcing	Conformance	The Entity's sourcing Process is in accordance with the requirements of the ASI Performance Standard. Please find below link to Constellium's Responsible Supply Chain Management Policy and Supplier Code of Conduct: <a href="https://www.constellium.com/sustainability/downloads/policies-codes-conduct">https://www.constellium.com/sustainability/downloads/policies-codes-conduct</a> .
2.5 Impact Assessments	Conformance	At the time of the Audit, the Entity was building a new press line on their premises (replacing the old line on existing ground of the site - no new land usage). Since the authorities did not consider this project as %major+and the project has no lasting negative effects on any of the subjects to be considered under this Criterion, an environmental, social, cultural or Human Rights Impact Assessment was not required for this project. For major projects, Constellium HQ is always involved.

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	The Entity has a site specific Emergency Response Plan developed in collaboration with relevant Stakeholders such as the neighbour companies, community and relevant authorities (e.g. fire brigade, civil protection). The Entity also holds ISO 14001 and OHSAS 18001 Certifications, which are current to the Entity's Certification Scope under ASI. A fire brigade is permanently on site.
2.7 Mergers and Acquisitions	Conformance	The Entity systematically reviews environmental, social and governance issues as part of the Entity's planning and Due Diligence Processes. Mergers and Acquisitions are not managed on local level but by corporate headquarter. There were no known Mergers and Acquisitions plans for the audited Entity since they joined ASI. A corporate procedure has specified the approach on environmental, social & governance due diligences for mergers & acquisitions, closure, decommissioning and divestment processes.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity systematically reviews environmental, social and governance issues as part of the Entity's planning and Due Diligence processes. Mergers and Acquisitions are not managed on local level but by the corporate headquarters. There were no known mergers and acquisitions plans for the audited Entity since they joined ASI. A corporate procedure has specified the approach on environmental, social & governance due diligences for mergers & acquisitions, closure, decommissioning and divestment processes.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	Constellium has published its commitment to the United Nations Global Compact. The group publicly disclosed its governance approach and its material environmental, social and economic impacts in the annual Constellium group Sustainability Report, which is based on GRI (Global Reporting Initiative) Principles. The 2019 business and Sustainability Report is publicly available following the link below: <a href="https://www.constellium.com/sites/default/files/constellium_business_sustainability_report_2019.pdf">https://www.constellium.com/sites/default/files/constellium_business_sustainability_report_2019.pdf</a> . The latest materiality assessment is described in the 2018 Sustainability Report on pages 37-39. <a href="https://www.constellium.com/sites/default/files/constellium_business_and_sustainability_report_2018_3.pdf">https://www.constellium.com/sites/default/files/constellium_business_and_sustainability_report_2018_3.pdf</a> .
3.2 Non-Compliance and liabilities	Conformance	Non-Compliance and liabilities are disclosed in Entity's Sustainability Review as per Global Reporting Initiative (GRI) guidelines. As stated in the Constellium group business and Sustainability Report 2019, for the GRI indicator "monetary value of significant fines /monetary sanctions", none were

CRITERION	RATING	COMMENT
		recorded for the whole group. A copy of the latest Sustainability Report can be found via the following link: <a href="https://www.constellium.com/sites/default/files/constellium_business_sustainability_report_2019.pdf">https://www.constellium.com/sites/default/files/constellium_business_sustainability_report_2019.pdf</a> (p. 72, GRI sections 417-2, 417-3, 419-1, p.70 GRI 307-1).
3.3a Payments to governments (legal and contractual)	Conformance	Non-Compliance and liabilities are disclosed in Entity's Sustainability Review as per Global Reporting Initiative (GRI) guidelines. As stated in the Constellium group business and Sustainability Report 2019, for the GRI indicator "monetary value of significant fines /monetary sanctions", none were recorded for the whole group. A copy of the latest Sustainability Report can be found via the following link: <a href="https://www.constellium.com/sites/default/files/constellium_business_sustainability_report_2019.pdf">https://www.constellium.com/sites/default/files/constellium_business_sustainability_report_2019.pdf</a> (p. 72, GRI sections 417-2, 417-3, 419-1, p.70 GRI 307-1).
3.3b Payments to governments (disclosure . Bauxite Mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has established accessible Complaints Resolution Mechanisms, adequate to address Stakeholder complaints, grievances and requests for information relating to its operations.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity's Headquarters has evaluated the environmental life cycle impacts of the main product line (Crash Management Systems). A copy of the current LCA summary can be found via the following link: <a href="https://www.constellium.com/sustainability/life-cycle-assessments">https://www.constellium.com/sustainability/life-cycle-assessments</a> .
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has defined and implemented procedures to provide adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium products, upon customer request. A copy of the current LCA summaries can be found via the following link: <a href="https://www.constellium.com/sustainability/life-cycle-assessments">https://www.constellium.com/sustainability/life-cycle-assessments</a> .
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	When communicating externally on Life Cycle Assessment (LCA) information, the Entity communicates through its Headquarters or the website, with the adequate assumptions and boundaries. Upon request, the critical review report of the full LCA study is also sent. A copy of the current LCA summaries can be found via the following link: <a href="https://www.constellium.com/sustainability/life-cycle-assessments">https://www.constellium.com/sustainability/life-cycle-assessments</a> .

CRITERION	RATING	COMMENT
4.2 Product design	Minor Non-Conformance	At corporate level, sustainability aspects are considered during the development of a new alloy. During the local development of a new product requested by a customer, the final agreement takes into account economic and practical feasibility. However, the Audit Team believes that sustainability issues are usually considered on local level but during the interviews, the Entity had not sufficient documentation at hand to demonstrate that clear objectives are established, monitored and reviewed in the design and development process for products (except of course for mass savings associated with the substitution of steel parts by lighter aluminium parts designed by the Entity).
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has implemented a process to minimize and monitor the Aluminium Process Scrap generation. There are measures to decrease the generation of fabrication scrap and the top management implemented scrap generation monitoring and targets. This is regularly reviewed during team meetings, as the Audit Team could verify. Scrap is 100% externally recovered.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entities developed and apply a strict separation of Process Scrap per aluminium alloy group.
4.4a Collection and recycling of Products at end-of-life (strategy)	Conformance	The Entity and its Headquarters have established a consistent aluminium recycling strategy as there is an external recycling unit within another Member's Entity. At a HQ level, targets and timeline were set to improve sorting and recycling.
4.4b Collection and recycling of Products at end-of-life (engagement)	Conformance	The Entity's Headquarters have recycling strategies that engage Stakeholders on different levels, markets and product lines. The Entity's Headquarters are a Member of the European Aluminium Association, and are also engaged in programs aiming at data collection, raising awareness and increasing recycling rates in several application areas, including automotive and packaging.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entities account for and publicly disclose on a yearly basis, at corporate level, GHG emissions and energy use by source in its Business and Sustainability Performance Report and in the CDP (Carbon Disclosure Project) answers. All documents are available on Constellium's website, via the following link: <a href="https://www.constellium.com/sustainability/downloads/disclosure-and-certifications">https://www.constellium.com/sustainability/downloads/disclosure-and-certifications</a> .
5.2 GHG emissions reductions	Conformance	The Entities publicly disclose its time-bound greenhouse gas emissions target on its website, available via the following link: <a href="https://www.constellium.com/singen-germany-aluminium-manufacturing-plant-constellium">https://www.constellium.com/singen-germany-aluminium-manufacturing-plant-constellium</a> . It addresses both direct and indirect emissions. They also implemented an action plan to achieve their goal.



CRITERION	RATING	COMMENT
5.3a Aluminium Smelting (Management System)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

#### PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE

6.1 Emissions to Air	Conformance	<p>Emissions to the air are under tight control according to local regulations and permits.</p> <p>The Entity monitors and publishes, at corporate level, its key emissions to air in its yearly Business and Sustainability Performance Report, that can be found via the following link: <a href="https://www.constellium.com/sustainability/downloads/brochures-reports">https://www.constellium.com/sustainability/downloads/brochures-reports</a> (see p63 GRI 305-7).</p> <p>For the Entity, emissions to the air are under tight control according to local regulations and plans are implemented to reduce their impacts.</p>
6.2 Discharges to Water	Conformance	<p>The Entity monitors and publishes, at corporate level, its key Discharges to Water in its yearly Business and Sustainability Performance Report, that can be found via the following link: <a href="https://www.constellium.com/sustainability/downloads/brochures-reports">https://www.constellium.com/sustainability/downloads/brochures-reports</a> (see p63 GRI 306-1).</p> <p>For the Entity, Discharges to Water are under tight control according to local regulations and permits. Plans are implemented to reduce their impacts.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity performed risk assessments and implemented measures to prevent contamination of air, water and soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented a Management System, including emergency, monitoring and communication procedures, to deal with the major risks of spills and leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Any spill will be handled internally by the plant fire brigade. The Entity has a procedure and system in place to properly communicate on spills to the local authorities. Fortunately, this didn't happen recently.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity's Headquarters report its significant spills publicly in its annual Sustainability Report. Such incidents did not happen in recent years. A copy of the latest Sustainability Report can be

CRITERION	RATING	COMMENT
		found via the following link: <a href="https://www.constellium.com/sustainability/downloads/disclosure-and-certifications">https://www.constellium.com/sustainability/downloads/disclosure-and-certifications</a> (GRI 306-3).
6.5a Waste management and reporting (strategy)	Conformance	Following the "German Recycling Management Act" (KrWG), the Entity has established a waste management strategy for the whole industrial site that is in accordance with the Waste Mitigation Hierarchy. As a result, less than 1% of wastes are sent to landfill as there is no other available option.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity discloses, at corporate level, its hazardous and non hazardous waste quantities and disposal methods in its annual Sustainability Report. A copy of the latest Sustainability Report can be found via the following link: <a href="https://www.constellium.com/sustainability/downloads/brochures-reports">https://www.constellium.com/sustainability/downloads/brochures-reports</a> (see p46 GRI 306-2).
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

#### PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The Entity has identified and monitors its water withdrawal and use by source and type. Even though it is under tight control, the overview could be improved to enhance clarity. Withdrawals come from multiple deep wells and from the town water and there are onsite over 100 water meters and regular analyses. The overall water withdrawal, discharges and uses could be simplified into one graphical Sankey diagram to improve clarity and monitoring.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed the current and forecast water-related risks within its Area of Influence, which is limited to the industrial area. The Entity respects all legal requirements due to the "Water protection area". The assessment has been performed with the external and online "Aqueduct water risk atlas" service and shows a low risk level at short and long term.
7.2a Water management (management plans)	Not Applicable	This Criterion has been rated as not applicable due to the low risk level identified in the risk assessment performed by the Entity.
7.2b Water management (monitoring)	Not Applicable	This Criterion has been rated as not applicable due to the low risk level identified in the risk assessment performed by the Entity.
7.3 Disclosure of water usage and risks	Conformance	The Entity discloses, at corporate level, its water withdrawals and uses in its 2019 annual Sustainability Report that can be found via the following link: <a href="https://www.constellium.com/sustainability/downloads/brochures-reports">https://www.constellium.com/sustainability/downloads/brochures-reports</a> (p.65 GRI-303-3). The Entity discloses its material water-related risks within the Carbon Disclosure Project (CDP) water assessment that can be found via the following link: <a href="https://www.constellium.com/sustainability/downloads/disclosure-and-certifications">https://www.constellium.com/sustainability/downloads/disclosure-and-certifications</a> .

#### PRINCIPLE 8 BIODIVERSITY

8.1 Biodiversity assessment	Conformance	The Area of Influence for the biodiversity covers ca 129 hectares and includes the "alusingen" area with other companies. Any
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CRITERION	RATING	COMMENT
		new project must be authorized by the local authority which evaluate "Nature, Landscape and Climate" impacts prior to authorization. With the help of a local nature NGO, the Entity developed a biodiversity procedure and a biodiversity risk analysis that includes suggestions of protection measures. The Entity also implemented an environmental Impact Assessment that covers biodiversity issues within its Area of Influence. The assessment for the Entity resulted in a "low" risk rating regarding biodiversity management.
8.2a Biodiversity management (Biodiversity Action Plans)	Not Applicable	This Criterion has been rated as not applicable due to the low risk level identified in the risk assessment performed by the Entity. Nevertheless, as part of the EHS Management System, some measures are implemented and reviewed to protect the local biodiversity.
8.2b Biodiversity management (Consultation and mitigation hierarchy)	Not Applicable	This Criterion has been rated as not applicable due to the low risk level identified in the risk assessment performed by the Entity.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion has been rated as not applicable due to the low risk level identified in the risk assessment performed by the Entity.
8.3 Alien Species	Conformance	The Entity has identified that the main risks of introduction of Alien Species are associated with products transportation and in particular with wooden pallets. The Entity takes preventive actions with packaging instructions, to avoid the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity.
8.4a Commitment to No Go+in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to No Go+in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine Rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine Rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9.1a Human Rights Due Diligence (Policy)	Conformance	<p>Constellium publicly subscribes to the United Nations Guiding Principles and has issued and communicated its Code of Conduct, which includes a commitment to respect Human Rights.</p> <p>The code can be accessed via the following link:  <a href="https://www.constellium.com/sites/default/files/Sustainability/Cod eofconduct/constellium_codeofconduct-2019-en-web.pdf">https://www.constellium.com/sites/default/files/Sustainability/Cod eofconduct/constellium_codeofconduct-2019-en-web.pdf</a>.</p>
9.1b Human Rights Due Diligence (Process)	Conformance	<p>Constellium group has conducted a documented Human Rights Due Diligence Process with internal Stakeholders, the next step is to conduct systematic consultation of external Stakeholders. The site is deeply imbedded in the Community and society and as confirmed by interviewed Stakeholders and management, there are currently no salient issues with regard to Human Rights.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The corporate Human Rights assessments has confirmed that there are no salient adverse Human Rights impacts present at the audited site. The Entity did not identify as having caused or contributed to adverse Human Rights impacts.</p>
9.2 Women's Rights	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to the women's rights requirements. During the site tour, interviews and document review, no indication for deliberate discrimination of women was observed. The Constellium group is reporting publicly on gender diversity indicators such as the number of female/male workers and male/female senior managers (Sustainability Report 2019, pages 51; 62-64; see:  <a href="https://www.constellium.com/sites/default/files/constellium_business_sustainability_report_2019.pdf">https://www.constellium.com/sites/default/files/constellium_business_sustainability_report_2019.pdf</a>. Constellium has identified the need to overcome the historical disadvantage of women as one of its priorities and has established a task force for gender diversity.</p>
9.3 Indigenous Peoples	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.</p>
9.5 Cultural and sacred heritage	Not Applicable	<p>There are no indigenous people present in the area, neither are there any land, sacred or cultural heritage sites within the Entity's Area of Influence. Industrial site located in Central Europe is active since more than 100 years.</p>

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Not Applicable	There are no indigenous people present in the area. The industrial site is active since more than 100 years.
9.6b Resettlements (where unavoidable)	Not Applicable	There are no indigenous people present in the area. The industrial site is active since more than 100 years.
9.7a Local Communities (rights and interests)	Conformance	The interviews during the assessment confirmed that the Entity respects the legal and customary rights and interests of Local Communities.
9.7b Local Communities (impacts)	Not Applicable	The Entity's Human Rights Due Diligence confirmed that there are no issues with Local Communities and therefore there is no need for action.
9.7c Local Communities (livelihoods)	Not Applicable	The Constellium group urges each of its sites to engage with Local Communities. See their Business and Sustainability Performance Report 2019 on p. 46, accessible via the following link: <a href="https://www.constellium.com/sites/default/files/constellium_business_sustainability_report_2019.pdf">https://www.constellium.com/sites/default/files/constellium_business_sustainability_report_2019.pdf</a> .
9.8 Conflict-Affected and High-Risk Areas	Conformance	During the assessment, there were no indications observed that the Entity would contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. The Constellium group publicly discloses the group's exposure to conflict affected sourcing through the Responsible Minerals Initiative - Conflict Minerals Reporting Template (RMI-CMRT) document. This document and Constellium's answer to the Securities and Exchange Commission (SEC) regarding the Dodd-Frank Act are available on Constellium's website at: <a href="https://www.constellium.com/sustainability/downloads/disclosure-and-certifications">https://www.constellium.com/sustainability/downloads/disclosure-and-certifications</a> .
9.9 Security practice	Conformance	The sites do not employ armed security forces. During the Entity's Human Rights risk assessment, no specific risks related to security practices were identified. Worker interviews confirmed that there were no known Human Rights violations caused by the security service.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	The Entity respects the rights of workers to unite freely in the unions, seek representation and join the works council without interference. A freely elected worker representation is in place. Document reviews and interviews confirmed that the Entity's management has adopted an open attitude towards employee representatives.
10.1b Freedom of Association and Right	Conformance	The Entity does respect the right of Collective Bargaining. It adheres to the industry wide Collective Bargaining Agreement (CBA) and there are also CBAs on site level. All own blue collar

CRITERION	RATING	COMMENT
to Collective Bargaining (Collective Bargaining)		workers are covered by the regulations of the CBA. Freedom of Association is stated in the Human Rights Policy (but not explicitly the right of Collective Bargaining. Rationale: the Policy has global coverage, in certain countries, the right of Collective Bargaining is limited).
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion of the ASI Performance Standard is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is not restricted in the country where the Entity operates/is located/seated.
10.2a Child Labour (minimum age)	Conformance	The Entity does neither use, nor support the use of Child Labour and does not engage in, or support, hazardous Child Labour. Young workers are employed for educational purpose only. If at all, work with hazardous substances happens only under supervision and as part of vocational education.
10.2b Child Labour (hazardous)	Conformance	As confirmed by the on-site tour and by interviews, young workers are employed for educational purpose only. If at all, work with hazardous substances happens only under supervision and as part of vocational education.
10.2c Child Labour (worst forms)	Conformance	As confirmed by site tour, document review and worker interviews, the Entity does neither use nor support, the use of Child Labour and does not engage in, nor support worst forms of Child Labour.
10.3a Forced Labour (Human trafficking)	Conformance	The Entity does neither engage in, nor support, the use of Forced Labour. The Entity does not engage in, nor support, Human trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and document review.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does neither engage in, nor support, the use of Forced Labour. The Entity does not require any form of deposit, recruitment fee or equipment in advance from workers either directly or through employment or recruitment agencies, as confirmed by interviews and document review.
10.3c Forced Labour (Migrant Workers)	Conformance	The Entity does neither engage in, nor support, the use of Forced Labour. The Entity does not require workers to lodge deposits or security payments at any time, as confirmed by interviews and document review.
10.3d Forced Labour (Debt Bondage)	Conformance	The Entity does neither engage in, nor support, the use of Forced Labour. The Entity does not hold workers in Debt Bondage or force them to work in order to pay off a debt, as confirmed by interviews and document review.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does neither engage in nor support, the use of Forced Labour. The Entity does not unreasonably restrict the freedom of movement of workers in the workplace, as confirmed by

CRITERION	RATING	COMMENT
		interviews and document review. The Entity does not provide on-site housing.
10.3f Forced Labour (retention of identity papers, permits, Certificates)	Conformance	The Entity does neither engage in, nor support, the use of Forced Labour. The Entity does not retain original copies of workers' identity papers, work permits, travel documents or training certificates, as confirmed by interviews and document review. Applicants must present an ID, but only a copy will be filed.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does neither engage in, nor support, the use of Forced Labour. The Entity does not deny workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length (3-6 months, depending on the length of service), as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	As confirmed by interviews and document review, the Entity does ensure equal opportunities and does not engage in or support discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to discrimination. Constellium has identified the need to overcome the historical disadvantage of women as one of its priorities and has established a task force for gender diversity. Employees received diversity and anti-discrimination training.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity does ensure open communication and direct engagement with workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	As confirmed by interviews and document review, the Entity does neither engage in nor tolerate, the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of workers.
10.7a Remuneration (living wage)	Conformance	The Entity does respect the rights of workers to a living wage and ensures that wages paid for a normal working week meet or exceed the industry Standard, as confirmed by document review and worker interviews. Working time, payment and leave are negotiated in collective bargaining agreements. The wages paid are substantially above the legal minimum. They are in line or above the industry Standard.



CRITERION	RATING	COMMENT
10.7b Remuneration (method of payment)	Conformance	The Entity's wage payments are timely, in legal tender and fully documented, as have been verified by document review and interviews during the assessment.
10.8 Working Time	Conformance	The Entity does comply with Applicable Law and industry Standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreements and part of each employment contract. Clocking-in System is in place. Records are on hand.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	The Entity has an Occupational Health and Safety Policy and Management System Certified OHSAS 18001:2007 by an accredited Certification body. Minor Non-Conformances identified in the recent OHSAS 18001 audit have been adequately addressed.
11.1b Occupational Health and Safety (OH&S) Policy (Workers and Visitors)	Conformance	The Entity has an Occupational Health and Safety Policy and Management System Certified OHSAS 18001:2007 by an accredited Certification body. Minor Non-Conformances identified in the recent OHSAS 18001 audit have been adequately addressed.
11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and Standards)	Conformance	The Entity has an Occupational Health and Safety Policy and Management System Certified OHSAS 18001:2007 by an accredited Certification body. Minor Non-Conformances identified in the recent OHSAS 18001 audit have been adequately addressed.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has an Occupational Health and Safety Policy and Management System Certified OHSAS 18001:2007 by an accredited Certification body. Minor Non-Conformances identified in the recent OHSAS 18001 audit have been adequately addressed.
11.2 OH&S Management System	Conformance	The Entity has an Occupational Health and Safety Policy and Management System Certified OHSAS 18001:2007 by an accredited Certification body. Minor Non-Conformances identified in the recent OHSAS 18001 audit have been adequately addressed.
11.3 Employee engagement on health and safety	Conformance	The Entity has an Occupational Health and Safety Management System Certified OHSAS 18001:2007 by an accredited Certification body. The Entity provides Workers with various mechanisms to discuss and participate in the resolution of Occupational Health and Safety issues with the top management.
11.4 OH&S performance	Conformance	The Entity has an Occupational Health and Safety Management System Certified OHSAS 18001:2007 by an accredited

CRITERION	RATING	COMMENT
		Certification body. The Entity evaluates its OHS performance through various lagging and leading indicators.

**Document Control and Version History**

Revision	Date	Notes
0	22 October 2020	Issued (Initial Certification)

# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

# CONSTELLIUM AS&I EXTRUSION SINGEN, AUTOMOTIVE STRUCTURES GOTTMADINGEN AND DAHENFELD

CERTIFICATE  
NUMBER

112

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

GUTCERT  
(AFNOR  
GROUP)

DATE OF ISSUE

29 ANUARY 2021

DATE OF EXPIRY

2 ANUARY 202

CERTIFIED SINCE

29 ANUARY 2021

AUTHORISED BY

A handwritten signature in white ink on a dark grey background. The signature is stylized and appears to be 'J. H.' followed by a long horizontal line.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at [www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

Extrusion plant of Constellium Singen (Germany) and  
Automotive Structure production sites of  
Gottmadingen (Germany) and Dahenfeld (Germany).

# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY STANDARD

### OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium AS&I Extrusion Singen, Constellium Automotive Structures Gottmadingen and Dahrenfeld
CERTIFICATION SCOPE	Extrusion plant of Constellium Singen (Germany) and Automotive Structure production sites of Gottmadingen (Germany) and Dahrenfeld (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Post-Casthouse</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Chain of Custody Standard V1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• First Certification Audit</li></ul>
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none"><li>• 30 November – 1 December 2020</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 17 December 2020</li></ul>
AUDIT SCOPE	<p>Includes the extrusion plant of Singen AS&amp;I, and the two downstream plants of Dahrenfeld and Gottmadingen manufacturing car components from extruded profiles.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Post-Casthouse</li></ul> <p>All relevant Criteria in the ASI Chain of Custody Standard were included in the Audit Scope.</p> <p>At the time of the audit (November – December 2020), access to facilities was not possible, due to COVID-19 related travel restrictions. Those facilities were audited as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this Report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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- The Audit Scope and Audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
  - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD	29 January 2021 – 28 January 2024
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	28 July 2022
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CERTIFICATE NUMBER	112
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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Constellium (parent company of the audited Entity "Constellium Singen GmbH") is an active ASI Member (Production and Transformation group) and it has committed to ASI's membership obligations. For further information please check the ASI website: <a href="https://aluminium-stewardship.org/about-asi/asi-members/constellium/">https://aluminium-stewardship.org/about-asi/asi-members/constellium/</a> .
1.2 Management system	Conformance	As confirmed by document review and interviews, the Entity has established a Management System that addresses all applicable requirements of the ASI CoC Standard. It has implemented relevant policies, systems, procedures and processes. The Management System includes a robust Material Accounting System based on the Entity's Enterprise-Resource-Planning System.
1.3 Management system reviews	Conformance	The Entity has established a mechanism for the periodic review and update of the Chain of Custody Management System, in line with the other facets of its Integrated Management System.
1.4 Management representative	Conformance	On group level, the Director Group Sustainability is in charge for implementation of and compliance with ASI requirements. Within the Entity, there is one person responsible for the implementation of ASI CoC Standard per site. Roles and responsibilities are defined in writing and are communicated within the Entity.
1.5 Training	Conformance	The Entity has prepared and conducted Chain of Custody specific training to relevant personnel and has communicated CoC related information to all employees.
1.6 Record keeping	Conformance	The Entity has implemented procedures to maintain up-to-date records covering all applicable requirements of the Chain of Custody Standard for more than the required 5 years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are documented in a procedure. They are suitable and appear to be robust. Reporting will include Input and Output Quantities of CoC Materials over the calendar year. Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.

CRITERION	RATING	COMMENT
1.7b Reporting to ASI (Input Percentage)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include Input Percentages calculated for the calendar year. Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.
1.7c Reporting to ASI (Positive Balance)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include the maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period, if any. Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include the maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents. Note: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in Aluminium Re-Melting/Refining to produce Recycled Aluminium.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in producing Casthouse Products.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The provisions of the Entity for Annual Reporting to the ASI Secretariat are suitable and appear to be robust. Reporting will include quantity of ASI Aluminium allocated to ASI Credits in the calendar year. Note 1: For the time being, the Entity does not intend to use ASI market credits. Note 2: A report has not yet been issued, as at the time of the audit, no ASI CoC Material was handled by the Entity.
<b>2 OUTSOURCING CONTRACTORS</b>		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.

CRITERION	RATING	COMMENT
2.2a Control of CoC Material	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.2b No further outsourcing	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.2c Risk assessment	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.3 Output Quantity	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.4 Verification and record-keeping	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.
2.5 Error management	Not Applicable	This Criterion is currently not applicable, as the Entity does not include Outsourcing Contractors within their CoC Certification Scope.

### 3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL

3.1a CoC Certification Scope – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Performance Standard – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a CoC Certification Scope – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Performance Standard – Alumina Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a CoC Certification Scope – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Performance Standard – Aluminium Smelting	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

### 4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL

4.1a CoC Certification Scope - Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.1b ASI Performance Standard - Aluminium Re-Melting/Refining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.



CRITERION	RATING	COMMENT
4.2a Pre-Consumer Scrap and Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.2b Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Supplier records	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3b Cash payments	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope - Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.1b ASI Performance Standard - Casthouses	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2 Casthouse Products	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope - Post-Casthouse	Conformance	The Entity's system is designed to ensure that it is itself producing ASI Aluminium only from Facilities which are within its own ASI CoC Certification Scope.
6.1b ASI Performance Standard - Post-Casthouse	Conformance	The Entity is Certified against the ASI Performance Standard, as can be verified on the ASI website <a href="https://aluminium-stewardship.org/about-asi/asi-members/constellium/">https://aluminium-stewardship.org/about-asi/asi-members/constellium/</a> .
6.1c Sourcing ASI Aluminium	Conformance	The Entity has defined that its Post-Casthouse Facilities shall only source ASI Aluminium from other ASI Certified Entities or via metal Traders. At the time of audit, ASI Aluminium has not yet been sourced at the Post-Casthouse Facilities.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has communicated its Supplier Code of Conduct to suppliers of Non-CoC Material. This Code can be found at: <a href="https://www.constellium.com/sustainability/downloads/policies-codes-conduct">https://www.constellium.com/sustainability/downloads/policies-codes-conduct</a> . It includes an Anti-Corruption Criterion.
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has communicated its Supplier Code of Conduct to suppliers of Non-CoC Material. This Code can be found at: <a href="https://www.constellium.com/sustainability/downloads/policies-codes-conduct">https://www.constellium.com/sustainability/downloads/policies-codes-conduct</a> . It includes a Responsible Sourcing Criterion.

CRITERION	RATING	COMMENT
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has communicated its Supplier Code of Conduct to suppliers of Non-CoC Material. This Code can be found at: <a href="https://www.constellium.com/sustainability/downloads/policies-codes-conduct">https://www.constellium.com/sustainability/downloads/policies-codes-conduct</a> . It includes a Human Rights Due Diligence Criterion.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has communicated its Supplier Code of Conduct to suppliers of Non-CoC Material. This Code can be found at: <a href="https://www.constellium.com/sustainability/downloads/policies-codes-conduct">https://www.constellium.com/sustainability/downloads/policies-codes-conduct</a> . It includes a Conflict-Affected and High-Risk Areas Criterion.
7.2 Risk assessment	Conformance	The Entity has implemented procedures to assess the risks of Non-Compliance/Compliance with its Responsible Sourcing Policy of its Non-CoC Material suppliers. Due Diligence checks are performed mainly using the ECOVADIS platform. Results of risk assessments and Due Diligence checks are well documented. Corrective Actions will be requested and undertaken if the results are sub-standard.
7.3 Complaints mechanism	Conformance	The Entity has a system in place to receive and handle feedback, including complaints and grievances of Stakeholders. This mechanism is in accordance with Criterion 3.2 of the ASI Performance Standard. Main means of contact are the webpage <a href="https://www.constellium.com/contact">https://www.constellium.com/contact</a> and the E-mail address <a href="mailto:sustainability@constellium.com">sustainability@constellium.com</a> are disclosed in the Supplier Code of Conduct.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity's Management System includes a Material Accounting System that records Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass. The Material Accounting System is based in the Entity's Enterprise-Resource-Planning System.
8.2a Post-Consumer Scrap	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2b Pre-Consumer Scrap (total)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.3 Material Accounting Period	Conformance	The Entity has specified in writing, that the Material Accounting Period in the Entity's Material Accounting

CRITERION	RATING	COMMENT
		System is 12 months starting from the first day of the calendar year.
8.4 Input Percentage	Conformance	The Entity calculates and records the Input Percentage using the appropriate formula. Units in the numerator and the denominator are the same. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.5 Input Percentage (Aluminium Re-Melting/Refining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	The Entity uses the Input Percentage for the Material Accounting Period to determine the Output Quantity of CoC Material, by mass. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.7 Output Quantity designation	Conformance	As written in the Entity's CoC procedure, the Entity has established that the Output Quantity of CoC Material is designated as 100% CoC Material. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.8 Output Quantity - Pre-Consumer Scrap	Conformance	For Pre-Consumer Scrap produced by the Entity, the Input Percentage of the Material Accounting Period will be used to determine the Output Quantity of Eligible Scrap. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.9 Outputs not exceed Inputs	Conformance	The Entity has implemented a procedure to check that the total output of CoC Material does not proportionally exceed the Input Percentage as applied to total input of CoC Material over the Material Accounting Period. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Entity's Material Accounting System is designed to ensure that max. 20% overdraw of total Input Quantity of CoC Material will happen within the Material Accounting Period in case of force majeure. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity's Material Accounting System is designed to ensure the Internal Overdraw will not exceed the amount of CoC Material affected by the force majeure situation. At the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity's Material Accounting System is designed to ensure that the Internal Overdraw will be made up within the subsequent Material Accounting Period. At

CRITERION	RATING	COMMENT
		the time of the audit, actual ASI CoC Material was not yet handled by the Entity.
8.11a Positive Balance (carry over)	Conformance	The Entity's Material Accounting System is designed to ensure any carry over of a Positive Balance is clearly identified. At the time of the audit, no ASI CoC Material was handled by the Entity.
8.11b Positive Balance (expiry)	Conformance	The Entity's Material Accounting System is designed to ensure that any Positive Balance of output CoC Material at the end of the Material Accounting Period will be carried over to the subsequent period and that such carry over will expire at the end of that period if not drawn down. At the time of the audit, no ASI CoC Material was handled by the Entity.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities as evidenced by a review of the Entity's ASI Chain of Custody related procedures, review of 'dummy' CoC Documents and interviews with personnel. The Entity will include CoC information in a separate accompanying document.
9.2a Date of issue	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes Date of Issue.
9.2b Reference number	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes a reference number.
9.2c Issuing Entity	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the identity, address and CoC Certification Number of the Issuing Entity.
9.2d Receiving customer	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the identity, address and CoC Certification Number of the receiving Entity.

CRITERION	RATING	COMMENT
9.2e Responsible employee	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the name of the responsible employee.
9.2f Conformance statement	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes a statement confirming that "The information provided in the CoC Document is in Conformance with the ASI CoC Standard."
9.2g Type of CoC Material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the Mass of CoC Material in the shipment.
9.2h Mass of CoC Material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the Type of CoC Material in the shipment.
9.2i Mass of total material	Conformance	The Entity ensures that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities. The design of the CoC Documents includes the Mass of total Material in the shipment.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in Aluminium Smelting, Aluminium Re-Melting/Refining or Casthouse operations. For the time being, Constellium does not provide Entity specific sustainability information to customers. Data for the group is available from the Constellium website: <a href="https://www.constellium.com/sustainability">https://www.constellium.com/sustainability</a> .
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable, as the Entity is not engaged in Aluminium Smelting, Aluminium Re-Melting/Refining or Casthouse operations. For the time being, Constellium does not provide Entity specific sustainability information to customers and therefore does not include data related to greenhouse gas emissions in CoC Documents. Sustainability Data for the group is available from the Constellium website: <a href="https://www.constellium.com/sustainability">https://www.constellium.com/sustainability</a> .

CRITERION	RATING	COMMENT
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has decided to provide information about its ASI Certification Status for the ASI Performance Standard on its CoC Documents.
9.4 Supplementary Information (optional)	Not Applicable	This Criterion is not applicable, as the Entity does not wish to include Supplementary Information on its CoC Documents.
9.5 Response to verification requests	Conformance	Relevant personnel have been trained and are aware of their duties under ASI CoC Standard. The system appears to be robust to document verification requests, errors, Corrective Actions and any potential preventive measures to meet ASI Chain of Custody Criteria.
9.6 Error management	Conformance	The Entity has defined in its ASI Management Procedure the way errors regarding CoC shipments shall be handled (documentation of the error, root cause analysis, communication, improvement actions to avoid recurrence).

#### 10 RECEIVING COC DOCUMENTS

10.1 Verify required information included	Conformance	The Entity has defined in a procedure the way to verify the received CoC Documents. A specific check list has been created. Tests of checklist performed are satisfactory. As there has been no sourcing of CoC Material at the time of the first Certification Audit, the effectiveness of this verification will be assessed at the next Surveillance Audit.
10.2 Verify consistency with shipments	Conformance	The Entity has defined in the ASI management Procedure how to verify the received CoC Documents and a specific checklist has been created to perform it. All deliveries are verified when entering the Facilities prior being entered in the internal SAP System. As there has been no sourcing of CoC Material at the time of the first Certification Audit, the effectiveness of this verification will be assessed at the next Surveillance Audit.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has defined a quarterly check of the validity and scope of supplier's ASI CoC Certification.
10.4 Error management	Conformance	The Entity has designed verification steps to review the consistency of received CoC Documents as required by the ASI Chain of Custody Standard. Relevant staff have been trained accordingly. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.

#### 11 MARKET CREDITS SYSTEM: ASI CREDITS

CRITERION	RATING	COMMENT
11.1a Material Accounting System - allocation	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.1c No double counting	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.1d No Positive Balance of ASI Credits	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2a Date of issue	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2b Reference number	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.2g Quantity	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3a CoC Certification Scope - purchasing ASI Credits	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3b Material Accounting System - purchasing	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.

CRITERION	RATING	COMMENT
11.3c Expiry	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3d No re-trading	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.
11.3g Five year maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable, as, for the time being, the Entity does not intend to use the market credit system.

## 12 CLAIMS AND COMMUNICATIONS

12.1a ASI Claims Guide	Conformance	The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. As there has been no claims regarding CoC at the time of the first Certification Audit, the effectiveness of the procedure will be assessed at the next Surveillance Audit.
12.1b Verifiable evidence	Conformance	The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. The Entity has demonstrated awareness that all ASI-related claims have to be supported by verifiable evidence. As there have been no claims regarding CoC at the time of the first Certification Audit, the effectiveness of the procedure will be assessed at the next Surveillance Audit.
12.1c Employee training	Conformance	The Entity has trained relevant employees regarding ASI claims and/or representations.

### Document Control and Version History

Revision	Date	Notes
0	29 January 2021	Issued (Full Certification)