

Modern Slavery Statement

1. About Constellium

Constellium is a global leader in the development, manufacturing and recycling of aluminium products and solutions primarily for the packaging, automotive and aerospace markets. With 12,500 employees, we operate 28 manufacturing sites and three R&D centers across Europe, North America, and China. More than 100 years of aluminium expertise and a commitment to sustainability, innovation, and continuous improvement have made Constellium a trusted partner to its customers around the world. We are a leader in the production of aluminium can sheet, as well as the recycling of used beverage cans. In automotive, our advanced aluminium solutions help manufacturers produce lighter, safer, and more fuel-efficient vehicles, as well as electric vehicles with greater range. In the aerospace market, we offer innovative, high-performance products and services to companies working in commercial aircraft, military aircraft, and space programs. We also supply the transportation, industry, defense, building and construction, renewable energy, and distribution sectors with an extensive selection of rolled and extruded products. More information about Constellium is available in the [About Us](#) section of our website.

2. Living Our Values

We are fully committed to living our values of safety, trust, respect, transparency, collaboration and empowerment, and to working with customers and suppliers who share those values.

Consistent with these values, Constellium is a signatory to the United Nations Global Compact. We are fully committed to acting in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs). We fully endorse and support the principles outlined in the International Bill of Human Rights and the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

As such, we are committed to the prevention of all forms of slavery, forced labor or servitude, child labor and human-trafficking (collectively referred to herein as "Modern Slavery"), both in our business and in our supply chain.

Modern Slavery is a serious crime and a violation of fundamental human rights. There are various forms of this 'Modern Slavery' which involve an individual being exploited by others, for personal or commercial gain; this encompasses a range of activities from recruiting, harboring, transporting, providing to obtaining labor through threat or coercion.

3. Preventing Modern Slavery in Our Value Chain

We are committed to implementing and enforcing systems and controls to prevent Modern Slavery in our business and in our value chain. We expect the same strict standards from all of our contractors, suppliers and other business partners, and we require our contractors and suppliers to comply with our policies and codes to combat the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children.

We have established a series of policies and standards to reinforce our commitments to safeguard and protect human rights throughout our business, including:

- [Worldwide Code of Employee and Business Conduct](#) (Code of Conduct)
- Social Management System
- [Human Rights Policy and Labor Practices](#)
- [Policy for Reporting Wrongdoings](#)
- [Sustainable Sourcing Policy](#) (formerly our Responsible Supply Chain Management Policy)
- [Supplier Code of Conduct](#)

These policies specifically prohibit forced or child labor, slavery and human trafficking. All our suppliers are expected to adhere to our Supplier Code of Conduct, which includes the prevention of Modern Slavery in all its forms.

4. Preventing Modern Slavery in Our Business

Constellium provides every employee with a written statement that outlines the terms and conditions of their employment. We align our employment practices including pay, time-off, work hours, and breaks with local laws and practices to ensure the health and safety of all our employees and contractors.

Additionally, Constellium ensures that the appropriate checks are completed on all employees during the employment process to confirm they are legally able to work and works with recruitment agencies and partners that share our commitment to minimizing the risk of Modern Slavery.

Each year, we conduct compliance training for our employees on our Code of Conduct, which outlines expected behaviors and company values, including how to report concerns or suspicions of violations of

Modern Slavery Statement

Human Rights. Since 2019, we have achieved a 100% completion rate on our annual Code of Conduct training.

5. Ensuring Compliance Internally and in Our Supply Chain

Employees, contractors and other external stakeholders are expected to report any suspicions of Modern Slavery in our business or supply chains immediately to our confidential third party [Integrity Hotline](#) or [Ombudsman](#) to be investigated promptly.

The Compliance Committee, chaired by our Senior Vice President and Group General Counsel, oversees training and communication of our Worldwide Code of Employee and Business Conduct, as well as its compliance, updating, and enforcement. This committee reviews cases received via the Integrity Hotline or other channels. Each review also provides an opportunity to study cases at a global level, so that we can mitigate any overall risks or concerns. This committee's reports to the Audit Committee include any material issues regarding the Constellium Policy on Sustainable Sourcing, the Human Rights Policy and Labor Practices, alleged cases of corruption or influence peddling. More information is available on the Corporate [Governance](#) section of our website.

6. Assessing Human Rights Risk within Our Business

At least every five years, Constellium performs a Human Rights risk assessment and due diligence process to identify and assess the potential or actual risks within and around our business. Annually, we conduct a risk assessment to determine potential risks within our business and supply chain as well. Our Sustainable Sourcing Policy details the assessment process for our supply chain. As part of these processes, we are dedicated to minimizing the risks of Modern Slavery in our business and our communities.

We continue to monitor and assess our compliance with our internal policies through the use of our Human Rights Due Diligence process, Integrity Hotline, investigate possible violations and continue to bring awareness to topics and risks concerning Human Rights.

Violations of Human Rights, potential modern slavery or human trafficking can be referred to our [Integrity Hotline](#) for prompt investigation.