

# CONSTELLIUM SE

## POLICY FOR REPORTING WRONGDOINGS

### 1. Purpose

This policy of Constellium SE and its group companies (together the "Group") addresses the Group's continuing commitment to **ethical behavior** by fostering an environment where **employees** as well as **other internal and external stakeholders** are encouraged to raise concerns, report wrongdoing or suspected wrongdoing, and are protected against retaliation for exercising this right.

This policy establishes the process and describes the different channels for reporting and how those concerns will be reviewed and what safeguards are in place to protect the reporter.

### 2. Definitions

For the purposes of this policy the terms below shall have the given definitions:

#### Wrongdoing

Wrongdoing in the workplace covers misconduct, malpractice, malfeasance, or impropriety of any nature that occurs within or is related to the workplace. Examples include, but are not limited to:

- violation of the company's code of conduct,
- violation of company's policies and procedures,
- fraud.

'Fraud' covers any illegal act characterized by deceit, concealment, or violation of trust [*Source: Institute of Internal Auditors*].

#### Good faith

Good faith is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe the report is true; However, a report does not have to be proven to be true to be made good in faith. Good faith is lacking when the disclosure is known to be malicious, false, or frivolous.

#### Ombudsman

A designated neutral or impartial person whose major function is to provide independent, impartial, confidential, and informal assistance to managers and employees, clients, and/or other stakeholders of Constellium. The Ombudsman is a member of the Compliance Committee.

### 3. Reporting Wrongdoing and Respective Channels

Employees or stakeholders who become aware of any suspected, attempted, or committed wrongdoing are encouraged to make a report as soon as possible.

Constellium has designated channels for reporting concerns or suspicions of instances of wrongdoing or irregularities.

#### How can I report?

The following reporting channels encourage open communication for individuals to speak up and raise concerns. Each of these channels ensures that concerns are investigated promptly, while maintaining the reporter's confidentiality. Concerns or Reports of Wrongdoing can be submitted through any of these channels at any time:

- **Internal Reporting Channels** – Employees are encouraged to raise concerns through local reporting channels such as their line manager, local management, Human Resources, and local works councils or union representatives. Concerns can also be raised through the Legal or Internal Audit teams.

- **Integrity Hotline & Online Submission Form** – Both employees and other internal/external stakeholders may use the Integrity Hotline or the [Online Submission Form](#). You can use the link or scan the QR code below to access the submission form.



The Integrity Hotline has toll free numbers available for each country in which the Group has locations (Constellium's toll-free numbers are available on our [website](#) and [intranet](#)).

The Hotline and Webform are managed through an external third-party vendor to ensure the reporter's anonymity and confidentiality. Reports can be made in the local language, at any time, 24 hours a day 7 days a week.

- **Ombudsman** - Concerns or suspected wrongdoings can also be emailed directly to the Ombudsman at [Ombudsman@constellium.com](mailto:Ombudsman@constellium.com)
- **External Reporting Channels** – In accordance with the EU Whistleblower Protection Directive, reports can also be raised through appropriate external competent authorities or relevant state-level members, as applicable.

In the event the act of wrongdoing concerns **a member of the Compliance Committee or Executive Committee** the Report of wrongdoing should be either:

- filed through the independent Integrity Hotline or Online Submission Form (in which case, the report will be sent directly to the Chair of the Audit Committee of the Board of Directors), or
- sent to the Chair of the Audit Committee at the following address:

Chair, Audit Committee  
Constellium  
Washington Plaza  
40-44, rue Washington  
75008 Paris, France

#### 4. Confidentiality and Zero-tolerance against Retaliation

The Company will strive to protect the confidentiality of the reporter. However, the Group (or its designated employees) may disclose the reporter's identity and confidential information if required by law or regulation.

All investigations are done in compliance with applicable laws in all relevant jurisdictions.

Constellium has a zero-tolerance stance against retaliation for reports of wrongdoings made in good faith. The right to protection against retaliation does not include immunity for any personal wrongdoing that is alleged, investigated and proven.

Any claims of acts of retaliation should be submitted to Human Resources or, if necessary, to a member of the Compliance Committee. Any person who retaliates against someone who in good faith has reported an event is subject to corrective action, including discipline up to and including possible termination of employment, to the extent permitted by applicable laws.

#### 5. Inquiry and Investigation Procedures

The Compliance Committee is the overseer of this policy and shall ensure that for each report investigations are made, actions taken, and relevant information is reported to the Executive and Audit Committees.

For all Reports of Wrongdoing:

- An inquiry or investigation will be initiated to determine if the report can be substantiated or has merit.

- Depending on the nature of the incident, the inquiry or investigation will be made by an individual or individuals (the “Case Manager”) designated by the Compliance Committee. This may include Local or Group HR, internal or external Counsel, or Internal Audit.
- All reports are reviewed by the “Case Manager” who is knowledgeable in investigating and following up on cases of Wrongdoing.
- The “Case Manager” will be bound by a strict obligation of confidentiality and will use their reasonable judgment to decide if there is a sufficient basis to commence a more formal investigation of the Report of Wrongdoing.
- If a Report of Wrongdoing is found to have merit, the “Case Manager” will promptly investigate and provide a conclusion, even if it is preliminary or qualified, regarding the merits of the report.
- All cases submitted via the Integrity Hotline & Online Submission Form are reviewed and responded to within three months of submission date.
- Results of all investigations will be reviewed at the Compliance Committee before closing the investigation. Records of all cases will be kept by the Compliance Committee and reported to the Audit Committee of the Board of Directors.

If a Report of Wrongdoing involves a **criminal act**, the Case Manager **must report all known criminal activities to the law enforcement for their investigation**. The timing of law enforcement involvement is at the discretion of local management. Also, based on sensitivity and confidentiality, the Case Manager may disseminate the information to alert the Group CFO, Group Controller, Internal Audit, Legal, other central functions, business units, and reporting units.

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