
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CONSTELLIUM ROLLED PRODUCTS SINGEN GMBH & CO. KG

CERTIFICATE
NUMBER

38

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

28 JULY 2022

DATE OF EXPIRY

27 JULY 2025

CERTIFIED SINCE

28 JULY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a white background.

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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

CERTIFICATION SCOPE

Rolling mill and casthouse facilities of the
Constellium Singen site (Germany).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium Rolled Products Singen GmbH & Co. KG
CERTIFICATION SCOPE	Rolling mill and casthouse facilities of the Constellium Singen site (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouse• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (9 – 10 May 2019)• Re-Certification Audit (11 – 15 July 2022)
AUDIT FIRM	GUTcert (AFNOR GROUP)
AUDIT DATE	<ul style="list-style-type: none">• 9 – 10 May 2019 (Initial Certification Audit)• 11 – 15 July 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 26 June 2019 (Initial Certification Audit)• 12 October 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 – 10 May 2019)</u></p> <p>Rolling mill and casthouse facilities of the Constellium Singen site (Germany).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouse• Semi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification Audit (11 – 15 July 2022)</u></p> <p>Rolling mill and casthouse facilities of the Constellium Singen site (Germany).</p> <p>Supply chain activities included in the audit scope:</p>

-
- Casthouse
 - Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- 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.

CERTIFICATION
PERIOD

28 July 2022 – 27 July 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

27 July 2025

CERTIFICATE
NUMBER

38

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes to adhere to legal compliance requirements. There are systems in place to maintain awareness of and to ensure compliance with Applicable Law. Corporate supports the site with legal counsel.</p> <p>https://www.constellium.com/singen-germany-aluminium-manufacturing-plant-constellium</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented a Code of Conduct and communicated it internally and externally. The Entity has provided training to employees on business ethics. The corporate headquarters operates a whistleblowing hotline, and the financial system is periodically audited by an external tax auditor. The Constellium Group reports periodically on Anti-Corruption in its annual sustainability report. The Sustainability Report and Code of Conduct are available at:</p> <p>https://www.constellium.com/reports-hub</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct that includes principles relevant to Environmental, Social and Governance (ESG) performance. Constellium's Group Code of Conduct and Supplier Code of Conduct is available at:</p> <p>https://www.constellium.com/reports-hub</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented and maintains Policies consistent with ESG practices, and employees are trained on the Policies. More information is available at:</p> <p>https://www.constellium.com/reports-hub</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has senior management endorsement and support through the provision of resources and regularly reviews the Policies.</p> <p>https://www.constellium.com/reports-hub</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has communicated its ESG Policies internally and externally as appropriate. The Supplier Code of Conduct is communicated to suppliers.</p> <p>https://www.constellium.com/reports-hub</p>

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has designated the Plant Manager with the overall responsibility and authority to ensure conformance and sufficient resources to support the implementation of the Standard. They are supported by the local team and by the corporate sustainability team.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System in accordance with ISO 14001.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an Occupational Health and Safety (OH&S) Management System and a Social Management System for human and labour rights but not yet formalised to the same extent as the Environment, Health, and Safety (EHS) system.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Supplier Code of Conduct and sourcing process. The Constellium Group Supplier Code of Conduct is available at: https://www.constellium.com/reports-hub
2.5 Impact Assessments	Conformance	The Entity has not undertaken any big New Projects or Major Changes to existing Facilities since it joined ASI. The site is in a highly regulated country (Germany), where relevant projects and changes (e.g., linked to construction activities) must undergo a thorough analysis and authorisation process and requires systems to manage this effectively.
2.6 Emergency Response Plan	Conformance	The Entity has established a site-specific Emergency Response Plan developed in collaboration with relevant Stakeholders such as neighbouring companies, the community, and relevant authorities. A fire brigade is permanently on-site.
2.7 Mergers and Acquisitions	Conformance	The Entity has implemented an ESG Due Diligence Policy for Mergers and Acquisitions: https://www.constellium.com/reports-hub Mergers and acquisitions are managed by corporate and not at a local level.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has an ESG Due Diligence Policy and a procedure to manage Mergers, Closures and Divestments: https://www.constellium.com/reports-hub The sites are in an industrial area that has been active for more than 100 years. There are no

CRITERION	RATING	COMMENT
		plans for the closure, decommissioning or divestments and are managed by corporate, not at the local level.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Constellium Group has publicly disclosed its governance approach and material environmental, social, and economic impacts in its sustainability report, based on the Global Reporting Initiative (GRI) and UN Global Compact principles. More information is available within the Business and Sustainability Performance Report 2021; pages 40- 41: https://www.constellium.com/reports-hub</p> <p>Relevant risks and opportunities are identified and evaluated in the Constellium.</p> <p>Constellium has published its commitment to the United Nations Global Compact: https://www.constellium.com/sustainability</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity discloses any non-compliances and liabilities within its annual sustainability report. In the 2021 report, for the GRI indicator 419-1 'Non-compliance with laws and regulations in the social and economic area', none were recorded for the whole group. More information is available within the Business and Sustainability Performance Report, page 89: https://www.constellium.com/reports-hub</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes that conform to Anti-Corruption requirements related to payments to governments and the facilitation of payments. The Constellium Group has publicly disclosed its governance approach within the sustainability report. More information is available within the Business and Sustainability Performance Report, pages 14, 40 and 86: https://www.constellium.com/reports-hub</p>
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	<p>The Entity has established Complaints Resolution Mechanisms to address stakeholder complaints, grievances and requests for information relating to its operations.</p> <p>An "Integrity Hotline" has been established (https://www.constellium.com/integrity-hotline) and is available 24 hours a day via toll-free</p>

CRITERION	RATING	COMMENT
		<p>telephone numbers in countries where Constellium has manufacturing Facilities or major offices.</p> <p>A secure e-mail option is also available: https://secure.ethicspoint.com/domain/media/en/gui/58698/index.html</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity's headquarters has evaluated life cycle impacts for its major product lines. The Summary of Life Cycle Assessments (LCAs) is available at: https://www.constellium.com/sustainability/life-cycle-assessments</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity has implemented a process to answer any customer request for LCA information. The Entity preferably uses the European Aluminium Association's environmental profile report 2018 that disclosed verified datasets allowing to provide 'cradle to gate' data.</p> <p>The Entity can produce both 'cradle to cradle' and 'cradle to gate' assessments on customer request.</p> <p>Information about Constellium's LCA is publicly available at: https://www.constellium.com/sustainability/life-cycle-assessments</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>When communicating externally on Life Cycle Assessment (LCA) information, the Entity communicates through its Headquarters with the adequate assumptions and boundaries.</p>
4.2 Product design	Conformance	<p>The Entity's headquarters has integrated sustainable requirements and Impact Assessments as part of its product development process. The Entity has implemented an assessment process on all new product development projects for sustainable impacts on energy, climate, waste, resources, social, and health & safety.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity's scrap is controlled and 100% recovered. It works systematically to minimise the generation of scrap.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>The Entity has established a scrap management procedure and thoroughly separates alloys and grades for recycling.</p>

CRITERION	RATING	COMMENT
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity and its Headquarters have established an aluminium recycling strategy. Constellium Group works with industry associations (e.g., European Aluminium) and customers to improve the recovery of Post-Consumer Scrap.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity's Headquarters has implemented recycling strategies that engage Stakeholders on different levels, markets, and product lines. The Entity's Headquarters is a member of the European Aluminium Association and is in joint programs to collect data and increase vehicle recycling rates and the 'Every can counts' program to increase recycling awareness.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	At the group level, Constellium Group has publicly disclosed its Greenhouse Gas (GHG) Emissions and energy use by type in its annual sustainability report. More information is available within the Business and Sustainability Performance Report, pages 62 and 80: https://www.constellium.com/reports-hub
5.2 GHG emissions reductions	Conformance	The Entity has publicly disclosed its GHG Emissions targets in its annual sustainability report. More information is available within the Business and Sustainability Performance Report, page 64: https://www.constellium.com/reports-hub
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	The Entity has developed and implemented Policies, systems, procedures, and processes according to local regulations and permits to manage Emissions to Air. https://www.constellium.com/singen-germany-aluminium-manufacturing-plant-constellium
6.2 Discharges to Water	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes

CRITERION	RATING	COMMENT
		according to local regulations and permits to manage Discharges to Water requirements. https://www.constellium.com/singen-germany-aluminium-manufacturing-plant-constellium
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted risk assessments and implemented measures to prevent contamination of air, water, and soil. https://www.constellium.com/singen-germany-aluminium-manufacturing-plant-constellium
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes to manage Spills and Leakage requirements. The Entity has a fire brigade with equipment for chemical protection and retention basins to retain extinguishing water.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented a procedure and system to communicate significant incidents, including Spills and Leakage to Stakeholders and the local authorities.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity's Headquarters report significant spills in its annual sustainability report. No incidents have occurred in recent years. More information is available at: https://www.constellium.com/reports-hub
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a Waste Management Strategy according to the Waste Mitigation Hierarchy with a focus on avoiding waste. All relevant employees have received training. In 2021, approximately 80% of all waste was recycled and 18 % was used in energy recovery.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has disclosed its waste quantities and disposal methods in its 2021 annual Sustainability Report. More information is available within the Business and Sustainability Performance Report, page 82: https://www.constellium.com/reports-hub
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.

CRITERION	RATING	COMMENT
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.
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)	Conformance	The Entity recovers 100% of the Dross and segregates it according to alloy group.
6.8b Dross (recycling)	Conformance	The Entity sends all Dross to be recycled externally by an ASI certified organisation. The Dross is not landfilled.
6.8c Dross (review of alternatives)	Conformance	The Entity does not send the Dross to landfill, the 'German Recycling Management Act' (KrWG) forbids the landfill of Dross. The Entity annually reviews its produced Dross quantity and has implemented projects to improve its collection or reduce its generation.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has mapped and tracked its water withdrawal, discharges, and usage according to local regulations.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks within its Area of Influence and implemented prevention measures accordingly. The risk assessment identified a low risk rating for water management.
7.2a Water management (management plans)	Conformance	The Entity has implemented water management plans with targets that are annually reviewed. The

CRITERION	RATING	COMMENT
		risk assessment identified a low risk rating for water management.
7.2b Water management (monitoring)	Conformance	The Entity has assessed its water-related risks and implemented prevention measures accordingly. The risk assessment identified a low risk rating for water management.
7.3 Disclosure of water usage and risks	Conformance	The Entity's Headquarters has disclosed its water withdrawals and use in its 2021 annual Sustainability Report. More information is available within the Business and Sustainability Performance Report, page 81: https://www.constellium.com/reports-hub
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has implemented an Environmental Impact Assessment with input from a local environment Non-Government Organisation (NGO) addressing biodiversity issues within its Area of Influence. The risk assessment has identified a low risk rating for biodiversity management.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has implemented a process to review its Biodiversity Action Plan annually with an action plan to address the impacts identified as material.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity implemented a Biodiversity Action Plan in consultation with an NGO and cooperation with the Local Community (Stadt Singen).
8.2c Biodiversity management (reporting)	Conformance	The Entity's Biodiversity Action Plan is publicly available at: https://www.constellium.com/singen-germany-aluminium-manufacturing-plant-constellium
8.3 Alien Species	Conformance	The Entity takes preventive actions to avoid the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on biodiversity (e.g., fumigation of wooden pallets according to international code ISPM 15).
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.

CRITERION	RATING	COMMENT
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.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Constellium Group publicly subscribes to the United Nations Guiding Principles for Human Rights and has communicated this commitment within its Code of Conduct. The 'Human Rights Policy and Labour Practices' as well as the Code of Conduct, is available at: https://www.constellium.com/reports-hub
9.1b Human Rights Due Diligence (process)	Conformance	The Constellium Group has conducted and documented its 2018 Human Rights Due Diligence process until now without systematic consultation with external Stakeholders.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Constellium Group has conducted Human Rights assessments and has confirmed that no negative Human Rights impacts are present at the sites.
9.2 Women's Rights	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes covering women's rights. The Constellium's Code of Conduct for employees and the Supplier Code of Conduct include non-Discrimination and gender principles. Constellium group reports publicly on gender diversity indicators such as the number of female/male Workers and male/female senior managers. Forbes included Constellium Group on their inaugural list of the world's 300 most female-friendly companies: https://www.forbes.com/female-friendly-companies
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply as Indigenous Peoples or their lands, territories and resources are not present in the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply as Indigenous Peoples or their lands, territories and resources are not present in the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion does not apply as no cultural heritage sites have been identified in the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion does not apply as no Resettlements have taken place.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion does not apply as no Resettlements have taken place.
9.7a Local Communities (rights and interests)	Conformance	The Entity has demonstrated it respects the legal and customary rights and interests of Local Communities. The Human Rights Due Diligence assessment did not identify any negative impacts on local communities.
9.7b Local Communities (impacts)	Conformance	The Entity's Human Rights Due Diligence confirmed there are no issues with Local Communities and therefore there is no need for action. However, the Entity works to prevent adverse impacts on Local Community livelihoods.
9.7c Local Communities (livelihoods)	Conformance	The Entity's Human Rights Due Diligence did not identify the presence of issues negatively affecting Local Communities. However, the Constellium Group fosters their site's engagement with Local Communities. More information is available within the Business and Sustainability Performance Report, pages 57-58: https://www.constellium.com/reports-hub
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Constellium Group publicly discloses the group's exposure to Conflict-Affected and High-Risk Areas (CAHRAs) sourcing through the Responsible Minerals Initiative's Conflict Minerals Reporting Template (RMI-CMRT). The RMI-CMRT document, Constellium's answer to the Securities and Exchange Commission (SEC) regarding the Dodd-Frank Act, their Supplier Code of Conduct and their Responsible Supply Chain Management Policy are available at: https://www.constellium.com/reports-hub
9.9 Security practice	Conformance	The Entity does not employ armed security forces. The Entity's Human Rights risk assessment identified there are no specific risks related to security practices, which was verified through interviews.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has demonstrated it respects the rights of Workers to unite freely in unions, seek representation and join the Works Council without interference. A freely elected worker representative is in place.

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has demonstrated it respects the right of Collective Bargaining. It adheres to the industry Collective Bargaining Agreement (CBA) and there are CBAs at the site level.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as the Entity does not operate in a country (Germany) where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity does neither use nor support the use of Child Labour and has implemented practices to ensure children are not employed. The minimum working age of 15 years is respected, and the youngest worker is an apprentice who is 16 years old.
10.2b Child Labour (hazardous)	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 purposes only. If at all, work with hazardous substances occurs only under supervision and as part of vocational education.
10.2c Child Labour (worst forms)	Conformance	The Entity does neither use nor support the use of Child Labour and does not engage in or support the 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 or support Human Trafficking either directly or through any employment or recruitment agencies. This was verified through interviews and document review.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require Workers to lodge deposits or security payments at any time. This was verified through interviews and document review.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Workers to lodge deposits or security payments at any time. This was verified through interviews and document review.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold Workers in Debt Bondage or force them to work to pay off a debt. This was verified through interviews and document review.

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace. This was verified through 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 not retain original copies of Workers' identity papers, work permits, travel documents or training certificates, as confirmed by interviews and document review.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny Workers the freedom to terminate their employment at any time without penalty or give notice at a reasonable length. This was verified through interviews and document review.
10.4 Non-Discrimination	Conformance	The Entity ensures equal opportunities and does not engage in or support Discrimination or any other condition that could give rise to Discrimination. This was confirmed through interviews and document review. The Constellium Group 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 receive diversity and Anti-Discrimination training. Further information is available at: https://www.constellium.com/people-careers/diversity-and-inclusion
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues without the threat of reprisal, intimidation, or harassment. This was verified through interviews and document review.
10.6 Disciplinary practices	Conformance	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. This was verified through interviews and document review.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to earn a living wage and meet industry standards. The wages paid are above the legal minimum. Working time, payment and leave are negotiated in Collective Bargaining Agreements. This was

CRITERION	RATING	COMMENT
		verified through worker interviews and document reviews.
10.7b Remuneration (method of payment)	Conformance	The Entity's wage payments are timely, in legal tender and documented. This was verified through interviews and document review.
10.8 Working Time	Conformance	The Entity has demonstrated it complies 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 each employment contract.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is ISO 45001 certified and has implemented and communicated its Occupational Health and Safety (OH&S) Policy: https://www.constellium.com/reports-hub
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented and communicated its OH&S Policy: https://www.constellium.com/reports-hub
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has implemented and communicated its OH&S Policy with a commitment to comply with Applicable Law. Constellium Group Code of Conduct requires adherence to ILO Conventions, page 10: https://www.constellium.com/reports-hub
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Minor Non-Conformance	The Entity has implemented and communicated its Occupational Health and Safety (OH&S) Policy. However, it was identified neither the Constellium Group Policy nor the local EHS Policy includes a statement that Workers have the right to understand the hazards and safe practices for their work and the authority to refuse or stop unsafe work. Although there is no specific statement in the Policies, management constantly communicates to the Workers that EHS is a top priority and that no work is that important that it cannot be performed safely.
11.2 OH&S Management System	Conformance	The Entity has implemented an OH&S Management System and holds an ISO 45001 certificate. https://www.constellium.com/reports-hub
11.3 Employee engagement on health and safety	Conformance	The Entity has established a health & safety committee has which meets quarterly. Workers

CRITERION	RATING	COMMENT
		and worker representatives are members of this committee.
11.4 OH&S performance	Conformance	The Entity has defined leading and lagging indicators to evaluate its OH&S performance. The safety performance information of the Constellium group is available in the Business and Sustainability Performance Report, page 76: https://www.constellium.com/reports-hub

Document Control and Version History

Revision	Date	Notes
0	28 July 2019	Initial Certification Audit – Full Certification
1	3 November 2022	Re-Certification Audit – Full Certification