



Constellium Supplier Code of Conduct

▲ Opening Statement

Constellium is a world leader in the manufacturing of high-quality aluminum products for a broad scope of markets and applications. At Constellium, sustainability not only entails ensuring that our own social, environmental and ethical standards are high but also to ensure that our values are reflected across our supply chain.

The Constellium Supplier Code of Conduct embodies a framework outlining the standards of integrity for which we strive throughout our business and supply chain. Suppliers are expected to agree to the terms of this code and uphold this code in all of their business operations. The Supplier Code of Conduct applies to all suppliers, subsidiaries, consultants, contractors and affiliates of Constellium.

Constellium is determined to keep improving its products and processes within its business. There are multiple advantages for our suppliers and business partners to adhere to the principles outlined in this Supplier Code of Conduct including:

- Demonstrating a commitment to good governance, ethics and continuous improvement
- Protecting and enhancing reputation and brand value
- Creating more sustainable and competitive products
- Increasing awareness of social, environmental and ethical risks

Constellium Supplier Code of Conduct

▲ Labor and Human Rights

As a signatory of the United Nations Global Compact (UNGC), we at Constellium have the upmost respect for human and labor rights. We require our suppliers to also espouse these values.

1. Anti-discrimination
 - Suppliers shall not discriminate against any worker based on age, disability, ethnicity, gender, marital status, national or social origin, political affiliation, race, religion, or sexual orientation in hiring, salary, promotion or termination.
2. Anti-Harassment and Abuse
 - Suppliers shall ensure a workplace free of harassment and abuse, including but not limited to verbal abuse, psychological harassment, mental and physical coercion, and sexual harassment.
3. Forced Labor
 - Suppliers shall ensure that all work is voluntary ;
 - Suppliers shall not withhold workers' original government-issued identification and travel documents.
4. Prevention of Child Labor
 - Suppliers shall not engage in child labor¹.
5. Working, Hours Wages and Benefits
 - Suppliers shall follow all applicable laws and internationally recognized standards with respect to working hours, compensation, benefits, overtime and days of rest.
6. Freedom of Association and Collective Bargaining
 - As legally permitted, suppliers shall freely allow workers to associate with others, form and join (or refrain from joining) organizations of their choice, and bargain collectively.

▲ Environment, Health and Safety

Suppliers shall ensure a safe and healthy work environment. Suppliers have an obligation to help protect the environment for the society at large.

1. Occupational Health, Safety and Hazard Protection
 - Suppliers shall identify, evaluate, and manage occupational health and safety hazards. Suppliers shall provide workers with appropriate personal protective equipment and instruction on its proper use.
 - Suppliers shall develop and implement emergency plans, response procedures and a system for corrective action.
2. Environment
 - Suppliers shall have systems in place to ensure safe management of waste, air emissions and wastewater discharges.
 - Suppliers shall obtain, keep current, and comply with all required environmental permits.
 - Suppliers shall seek to reduce the use of energy, water, natural resources and hazardous substances by implementing conservation and substitution measures.

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▲ Business Ethics

Ethics are at the foundation of doing business at Constellium. We are committed to “do it right.” and want to do business with organizations that we know we can trust.

1. Business Integrity
 - Suppliers shall not be involved in corruption, extortion, embezzlement, or bribery. Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate.
2. Disclosure of Information
 - Suppliers shall accurately record and disclose information regarding its business activities, labor, health and safety, and environmental practices to all appropriate parties.
3. Protection of Intellectual Property and Confidential Information
 - Suppliers shall respect intellectual property rights and safeguard customer information.
4. Conflicts of Interest
 - Suppliers shall avoid conflicts of interest and the appearance of conflicts of interest.

▲ Sustainable Procurement

- Suppliers shall represent and warrant to cascade the principles contained in this Supplier Code of Conduct to their own suppliers and to implement a continuous improvement and compliance regime.

This Constellium Supplier Code of Conduct applies to all suppliers, subsidiaries, consultants, contractors and affiliates of Constellium. It is a requisite part of all contractual agreements entered into between Constellium and its suppliers from the date of entry into force of this code indicated.

In case any violation of this Code is identified, the applicable supplier might, at Constellium’s discretion, be given time to remediate the problem, with Constellium assistance where possible. If the problem is not addressed in an effective way and within a clear timeframe that is acceptable to Constellium, we reserve the right to terminate our business relationship with the violating supplier.

¹This is in reference to the UNGC definition of child labor in accordance with ILO conventions (Minimum Age Convention No. 138 and the Worst Forms of Child Labor Convention No. 182)

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All suppliers (and their subsidiaries), consultants and contractors entering into a commercial relationship with any Constellium entity from the day of entering into such relationship will also be deemed as adhering to the Constellium Supplier Code of Conduct, and the written entitlement document (i.e. purchase order, contract, master service agreement, etc.) will be considered as acceptance.

By adhering to this Supplier Code of Conduct, each supplier of Constellium accepts to be assessed or audited by Constellium or by a third party mandated by Constellium on the above-mentioned principles. I HEREBY ACKNOWLEDGE that I am an authorized representative of the company referenced below, have carefully reviewed and understood the substance of the above document, and confirm that the company referenced below is in full compliance with Constellium Supplier Code of Conduct.

Supplier Company Name: _____

Supplier representative name (Print): _____

Title of supplier representative (Print): _____

Date: _____

Signature and Company Stamp