
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CONSTELLIUM

CERTIFICATE
NUMBER

38

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

28 JULY 201

DATE OF EXPIRY

27 JULY 2022

CERTIFIED SINCE

28 JULY 201

AUTHORISED BY

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

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CERTIFICATION SCOPE

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

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at*

www.aluminium-stewardship.org

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">• Certification Audit
AUDIT FIRM	GUTcert (AFNOR GROUP)
AUDIT DATE	9 – 10 May 2019
AUDIT REPORT SUBMISSION	26 June 2019
AUDIT SCOPE	<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>
AUDIT OUTCOME	<ul style="list-style-type: none">• 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 2019 – 27 July 2022

NEXT AUDIT
TYPE

Recertification Audit

NEXT AUDIT
DUE DATE

27 July 2022

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 that conform to ASI Performance Standard's legal compliance requirements.</p> <p>There are systems in place to maintain awareness of and to ensure compliance with applicable law.</p> <p>The Entity holds ISO 14001 and OHSAS 18001 certifications from an accredited certification body. Corporate supports the site with legal counsel.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against corruption in all its forms, consistent with applicable law and prevailing international standards.</p> <p>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 Headquarters operates a whistleblowing hotline where potential breaches or suspected corruption can be reported confidentially.</p> <p>The financial system is periodically audited by an external tax auditor.</p> <p>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: https://www.constellium.com/sustainability/downloads/disclosure-and-certifications</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a code of conduct including principles relevant to environmental, social and governance performance.</p> <p>Constellium's group code of conduct can be accessed via the link below: https://www.constellium.com/sites/default/files/Sustainability/Codeofconduct/constellium_codeofconduct-2019-en-web.pdf</p> <p>Their supplier code of conduct is available via this link: https://www.constellium.com/sites/default/files/Sustainability/en_constellium_supplier_code_of_conduct_final.pdf</p>

CRITERION	RATING	COMMENT
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 the environmental, social and governance practices included in the ASI Performance Standard. 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. More information can be found via the link below:</p> <p>https://www.constellium.com/sites/default/files/certifications/constellium_singen_certificates_english_0.zip</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>In accordance with the ASI Performance Standard as well as their Environmental, Energy and Health & Safety Management System, the Entity has senior management endorsement and support through provision of resources and regularly review the policies. The Entity obtained ISO 14001, ISO 50001 and OHSAS 18001 certifications which are consistent with their ASI Certification Scope.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has communicated the policies internally and externally as appropriate (company website, intranet). Their supplier code of conduct is actively communicated to their suppliers. A copy of the latest EHS policy can be found via the following link:</p> <p>https://www.constellium.com/sustainability/Downloads/policies-codes-conduct.</p> <p>The Entity works against corruption in all its forms, consistent with applicable law and prevailing international standards. 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 Headquarters 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.</p>
2.2 Leadership	Conformance	<p>The Entity's plant manager has the overall responsibility and authority for ensuring</p>

CRITERION	RATING	COMMENT
		<p>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.</p>
<p>2.3a Environmental and Social Management Systems (environmental)</p>	<p>Conformance</p>	<p>The Entity has documented and implemented an environmental management system according to ISO 14001 and an energy management system according ISO 50001. These systems are certified by an accredited certification body.</p>
<p>2.3b Environmental and Social Management Systems (social)</p>	<p>Conformance</p>	<p>The Entity has documented and implemented an accredited H&S management system (OHSAS 18001). The facets human & labour rights are also managed in a social management system, but the practice is not yet formalized to the same extent as the EHS (Environment, Health and Safety) system.</p>
<p>2.4 Responsible Sourcing</p>	<p>Conformance</p>	<p>The Entity's sourcing process is in accordance with the requirements of the ASI Performance Standard. Please find below link to Constellium's supplier code of conduct: https://www.constellium.com/sites/default/files/Sustainability/en_constellium_supplier_code_of_conduct_final.pdf</p>
<p>2.5 Impact Assessments</p>	<p>Conformance</p>	<p>No new bigger projects or major changes to existing facilities took place since the Entity joined ASI. The site is located in a highly regulated country (Germany), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorization process (including Human Rights) and the Entity has systems in place to manage this effectively. However, social aspects are not yet regulated to the same extent as Health & Safety and environmental facets. This has been identified by the Entity and they are working to strengthen their existing processes.</p>
<p>2.6 Emergency Response Plan</p>	<p>Conformance</p>	<p>The Entity has a site-specific emergency response plan developed in collaboration with relevant stakeholders such as the neighbour companies, community and relevant authorities. The Entity also holds ISO 14001 and OHSAS 18001 certifications which are current to the Entity's Certification Scope under ASI. A firebrigade is permanently on site.</p>

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	The site systematically reviews environmental, social and governance issues as part of the Entity's planning and due diligence processes. Mergers & acquisitions are not managed on local level but by the Entity's Corporate Headquarters. There were no known mergers and acquisitions plans for the audited Entity since they joined ASI.
2.8 Closure, Decommissioning and Divestment	Conformance	The site systematically reviews environmental, social and governance issues as part of the Entity's planning process. Closure, decommissioning and divestment are not managed on local level but by corporate Headquarters. There were no closure, decommissioning and divestment plans for the audited Entity since they joined ASI.
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 Constellium group sustainability report, which is based on GRI (Global Reporting Initiative) principles. The Constellium materiality assessment and their 2017 business and sustainability report are publicly available following the links below: https://www.constellium.com/sites/default/files/Sustainability/constellium_materiality_assessment.pdf https://www.constellium.com/sites/default/files/constellium_business_and_sustainability_report_2017-200718.pdf
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, the Constellium group business and sustainability report 2017, 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: https://www.constellium.com/sustainability/downloads/brochures-reports (GRI section 419).
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes

CRITERION	RATING	COMMENT
		that conform to anti-corruption requirements related to payments to governments and facilitation of payments (among the instruments, there are policies, training, guidelines, risk assessments and audits; see also comments for criterion 1.2).
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	Minor Non-Conformance	The Entity has established accessible complaints resolution mechanisms, adequate to address stakeholder complaints, grievances and requests for information relating to its operations. However, the employee hotline does not fully comply with the EU Data Protection Regulation and is not designed for German employees.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity's Headquarters evaluated life cycle impacts from its major product lines, conforming to this criterion of the ASI Performance Standard.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	An Entity's Headquarters have procedures established to answer any customer request on Life Cycle Assessment (LCA) information.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	When communicating externally on Life Cycle Assessment (LCA) information, the Entity communicates through its Headquarters with the adequate assumptions and boundaries. A copy of the current LCAs can be found via the following link: https://www.constellium.com/sustainability/life-cycle-assessments .
4.2 Product design	Conformance	The Entity's Headquarters integrated sustainable requirements and impact assessments as part of its product development process.
4.3a Aluminium Process Scrap (targets)	Conformance	Scrap is firmly controlled by the Entity and 100% internally recovered.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity thoroughly separates alloys and grades for recycling.

CRITERION	RATING	COMMENT
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity and its Headquarters have a consistent aluminium recycling strategy established.
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 is a member of the European Aluminium Association, and also in programs such as the "LCA and recycling" program with the French government" to collect data and increase vehicle recycling rates and the "Every can counts" program to increase awareness on recycling.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity publicly disclose (through its Headquarters) greenhouse gas (GHG) emissions annually within the Carbon Disclosure Project (CDP) methodology. A copy of the latest CDP methodology can be found via the following link: https://www.constellium.com/sustainability/downloads/disclosure-and-certifications (sections C6.1 to C6.5). The Entity publicly discloses (through its Headquarters) its energy use by type annually in their sustainability report. A copy of the latest sustainability report can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports (GRI section 302-1).
5.2 GHG emissions reductions	Conformance	The Entity publicly discloses its greenhouse gas emissions targets on its website, available via the following link: https://www.constellium.com/singen-germany .
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	Emissions to the air are under tight control according to local regulations and permits. The

CRITERION	RATING	COMMENT
		<p>Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's air emissions requirements. The Entity has an ISO14001 valid certificate, which can be accessed via the link below:</p> <p>https://www.constellium.com/sites/default/files/certifications/constellium_singen_certificates_english_0.zip</p>
6.2 Discharges to Water	Conformance	<p>Discharges to water are under tight control according to local regulations and permits. The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's discharges to water requirements. The Entity's has an ISO14001 valid certificate, which is accessible via the following link:</p> <p>https://www.constellium.com/sites/default/files/certifications/constellium_singen_certificates_english_0.zip</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity performed risk assessments and implemented measures to prevent contamination of air, water and soil. The Entity holds a valid ISO 14001 certificate, which can be retrieved from the following link:</p> <p>https://www.constellium.com/sites/default/files/certifications/constellium_singen_certificates_english_0.zip</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's assessment and management of spills and leakage requirements. This includes external communication.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has a procedure and system in place to communicate on spills to its stakeholders.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity's Headquarters report its significant spills publicly in its annual sustainability report. Fortunately, no such incidents did happen in recent years. A copy of the latest sustainability report can be found via the following link:</p> <p>https://www.constellium.com/sustainability/downloads/disclosure-and-certifications.</p>

CRITERION	RATING	COMMENT
6.5a Waste management and reporting (strategy)	Conformance	The Entity implemented a waste management strategy according to the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity discloses its waste quantities and disposal methods in its annual sustainability report. A copy of the latest sustainability report can be found via the following link: https://www.constellium.com/sustainability/downloads/disclosure-and-certifications . This reporting does not yet include a distinction between Hazardous and Non-Hazardous Waste generation.
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.
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	100% of the dross is gathered, segregated per alloy group and recycled externally. No dross is landfilled.

CRITERION	RATING	COMMENT
6.8b Dross (recycling)	Conformance	100% of the dross is gathered, segregated per alloy group and recycled externally. No dross is landfilled.
6.8c Dross (review of alternatives)	Conformance	100% of the dross is gathered, segregated per alloy group and recycled externally. No dross is landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity tracks its water withdrawal and usage according to strict local regulations and conforms to ASI Performance Standard's water assessment requirements.
7.1b Water assessment (risk assessment)	Conformance	The Entity assessed its water-related risks within its Area of Influence, and implemented prevention measures accordingly. The risk assessment for the Entity resulted in a "low" risk rating regarding water management.
7.2a Water management (management plans)	Conformance	The Entity implemented water management plans with targets, and review them yearly in accordance with ASI Performance Standard's water assessment requirements. The risk assessment for the Entity resulted in a "low" risk rating regarding water management.
7.2b Water management (monitoring)	Conformance	The Entity assessed its water-related risks and implemented prevention measures accordingly, conforming to the ASI Performance Standard. The risk assessment for the Entity resulted in a "low" risk rating regarding water management.
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity's Headquarters discloses its material water-related risks within the Carbon Disclosure Project (CDP) water assessment and a copy of the latest CDP water assessment can be found via the following link: https://www.constellium.com/sustainability/downloads/disclosure-and-certifications.</p> <p>The Entity's Headquarters discloses its water withdrawals and uses in its annual sustainability report and a copy of the annual sustainability report can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports.</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity implemented an environmental impact assessment with input from a local

CRITERION	RATING	COMMENT
		nature NGO (Non-Government Organisation) 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)	Minor Non-Conformance	The Entity recently implemented an appropriate biodiversity action plan and no monitoring has yet been performed. A review of its effectiveness must be planned and performed regularly.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity implemented a biodiversity action plan in accordance with the Biodiversity Mitigation Hierarchy.
8.2c Biodiversity management (reporting)	Minor Non-Conformance	Communication on achieved biodiversity outcomes does not yet exist as the process just started. The Entity must implement a disclosure of the Entity's biodiversity risks and outcomes.
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.
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.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	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. The code can be accessed via the following link: https://www.constellium.com/sites/default/files/Sustainability/Codeofconduct/constellium_codeofconduct-2019-en-web.pdf

CRITERION	RATING	COMMENT
9.1b Human Rights Due Diligence (process)	Conformance	Constellium group has a conducted a documented human rights diligence process but until now without systematic consultation of external stakeholders. However, the site is deeply imbedded in the community and society and as witnessed by interviewed stakeholders and management, there are currently no salient issues with regard to human rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The corporate human rights assessments have confirmed that there are no salient adverse Human Rights impacts present at the audited site. The Entity did not identifies as having caused or contributed to adverse Human Rights impacts.
9.2 Women's Rights	Conformance	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. Constellium has identified the need to overcome the historical disadvantage of women as one its priorities and has established a task force for gender diversity, which includes a member from the audited site.
9.3 Indigenous Peoples	Not Applicable	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.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	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.
9.5 Cultural and sacred heritage	Not Applicable	This criterion of the ASI Performance Standard does not apply to the Entity, as no sacred or cultural heritage sites and values within the Entity's area of influence are present. Also, Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Not Applicable	This criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements being considered or taking place during the period since joining ASI, or expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion of the ASI Performance Standard does not apply to the Entity, as no resettlements being considered or taking place during the period since joining ASI, or expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of local communities.
9.7b Local Communities (impacts)	Conformance	The human rights due diligence confirmed that there are no issues with local communities and therefore no need for action. However, The Entity prevents any adverse impacts on local community livelihoods.
9.7c Local Communities (livelihoods)	Conformance	The Constellium group urges each of its sites to engage with local communities. See their Business and Sustainability Performance Report 2017 on p. 46, accessible via the following link: https://www.constellium.com/sites/default/files/constellium_2017_business_and_sustainability_performance_report.pdf .
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 https://www.constellium.com/sustainability/downloads/disclosure-and-certifications
9.9 Security practice	Conformance	The site does not employ armed security forces. During the Entity's human rights risk

CRITERION	RATING	COMMENT
		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.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity does respect the right of collective bargaining. It adheres to the industry Collective Bargaining Agreement (CBA) and there are also CBAs on site level. 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 China, the right of collective bargaining is limited. All employees are covered by CBAs.
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. Minimum working age of 15 years is respected. The youngest worker (apprentice) was 16 years old. There are robust practices in place to ensure then children are not employed.
10.2b Child Labour (hazardous)	Conformance	The Entity does neither use nor support the use of child labour and does not engage in or supporting 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.
10.2c Child Labour (worst forms)	Conformance	The Entity does neither use nor support the use of child labour and does not engage in or supporting 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

CRITERION	RATING	COMMENT
		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 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 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, 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

CRITERION	RATING	COMMENT
		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 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 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 with the industry standard.
10.7b Remuneration (method of payment)	Conformance	As has been verified by document review and interviews during the assessment, the Entity's wage payments are timely, in legal tender and fully documented.
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 is OHSAS 18001:2007 certified by an accredited certification body, therefore it is

CRITERION	RATING	COMMENT
		eligible for harmonization. The Entity has implemented and communicated it's OHS policy as required by the ASI Performance Standard.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity is OHSAS 18001:2007 certified by an accredited certification body, therefore it is eligible for harmonization. The Entity has implemented and communicated it's OHS policy as required by the ASI Performance Standard.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity is OHSAS 18001:2007 certified by an accredited certification body, therefore it is eligible for harmonization. The Entity has implemented and communicated it's OHS policy as required by the ASI Performance Standard.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity is OHSAS 18001:2007 certified by an accredited certification body, therefore it is eligible for harmonization. The Entity has implemented and communicated it's OHS policy as required by the ASI Performance Standard.
11.2 OH&S Management System	Conformance	The audit team reviewed the most recent OHSAS 18001:2007 certificate and report. Any identified non-conformances are being actioned by the Entity. The certificate is valid and covers the full Entity's ASI Certification Scope. The Entity's OH&S management system is well implemented.
11.3 Employee engagement on health and safety	Conformance	The audit team reviewed the most recent OHSAS 18001:2007 certificate and report. Any identified non-conformances are being actioned by the Entity. The certificate is valid and covers the full Entity's ASI Certification Scope. The Entity's OH&S management system is well implemented.
11.4 OH&S performance	Conformance	The audit team reviewed the most recent OHSAS 18001:2007 certificate and report. Any identified non-conformances are being actioned by the Entity. The certificate is valid and covers the full Entity's ASI Certification Scope. The Entity's OH&S management system is well implemented.

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

CONSTELLIUM

CERTIFICATE
NUMBER

55

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

DECEMBER 201

DATE OF EXPIRY

3 DECEMBER 2022

CERTIFIED SINCE

DECEMBER 201

AUTHORISED BY

A handwritten signature in white ink on a dark grey background.

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

CERTIFICATION SCOPE

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

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at www.aluminium-stewardship.org*

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

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">• Casthouses• Post-Casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	GUTcert (AFNOR GROUP)
AUDIT DATE	6 October 2019
AUDIT REPORT SUBMISSION	5 November 2019
AUDIT SCOPE	<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">• Casthouses• Post-Casthouse <p>Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><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.<input checked="" type="checkbox"/> 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 4 December 2019 – 3 December 2022

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 3 June 2021

CERTIFICATION NUMBER 55

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Constellium (parent company of the audited Entity "Constellium Rolled Products Singen GmbH & Co. KG") 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 https://aluminium-stewardship.org/about-asi/asi-members/constellium/
1.2 Management system	Conformance	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. The site manager has taken overall responsibility of the implementation of ASI standards within the Entity. The specific requirements regarding ASI chain-of-custody are managed by the supply chain specialist of the Entity. Roles and responsibilities are defined in writing and are communicated within the Entity.
1.5 Training	Conformance	The Entity has established a training plan, prepared and conducted chain-of-custody specific training to relevant personnel and intends to raise awareness of all employees.
1.6 Record keeping	Conformance	The Entity has implemented measures to ensure that up-to-date records covering all applicable requirements of the ASI CoC Standard are maintained and retained for a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The provisions of the Entity for annual reporting to the ASI secretariat 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

CRITERION	RATING	COMMENT
		time of the audit, there has been no sourcing of CoC Material by the Entity.
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. Applicable requirements of criterion 1.7 are met. Note: A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material 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. Applicable requirements of criterion 1.7 are met. Note: A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material 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. Applicable requirements of criterion 1.7 are met. Note: A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The Entity is not engaged in Aluminium Re-melting/Refining to produce Recycled Aluminium. This criterion is therefore not applicable.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	The provisions of the Entity for annual reporting to the ASI secretariat are suitable and appear to be robust. Applicable requirements of criterion 1.7 are met. Note: A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The Entity does not intend to use ASI Credits. This criterion is therefore not applicable.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This criterion (2.1) is currently not applicable, as the Entity does not include outsourcing contractors within their CoC certification scope.
2.2a Control of CoC Material	Not Applicable	This criterion (2.2a) 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 (2.2b) is currently not applicable, as the Entity does not include outsourcing contractors within their CoC certification scope.

CRITERION	RATING	COMMENT
2.2c Risk assessment	Not Applicable	This criterion (2.2c) 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 (2.3) 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 (2.4) 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 (2.5) 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.
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.

CRITERION	RATING	COMMENT
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	Conformance	Constellium Singen Casthouse is within the CoC Certification Scope, which is defined as Constellium Rolled Products Singen GmbH & Co. KG with its supply chain activities Casthouse and Post-Casthouse.
5.1b ASI Performance Standard – Casthouses	Conformance	Constellium Singen is a founding ASI member, and has achieved certification against the ASI Performance Standard in 2019, as is shown on the ASI website https://aluminium-stewardship.org/about-asi/asi-members/constellium/ The Certification scope is rolling mill and casthouse facilities of the Constellium Singen site (Germany).
5.2 Casthouse Products	Conformance	The Entity's material accounting system is designed to ensure that all input as well as output of CoC material is identified by unique identification numbers. These numbers are traceable with in the Entity's enterprise-resource-planning system. All output of ASI CoC material can be linked to the input quantity of CoC Material for a given material accounting period.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	Due to the system design and as the Entity has both casthouse and post-casthouse activities under the same ASI certification, it is ensured that the Entity is producing ASI aluminium from material within its 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 (https://aluminium-stewardship.org/about-asi/asi-members/constellium/).
6.1c Sourcing ASI Aluminium	Conformance	The Entity's strategic plans with future ASI certified suppliers will secure the supply and production of ASI CoC materials. The Entity will be sourcing ASI aluminium directly from another ASI CoC certified Entity, or via a metal's trader or warehouse. The documented system in place ensures that in any case, the Entity which produced the ASI aluminium can supply or verify the associated CoC documentation, containing information sufficient to identify the corresponding shipment. The ASI status

CRITERION	RATING	COMMENT
		of suppliers of ASI material will be periodically checked by the Entity.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has issued and communicated a supplier code of conduct and also a responsible supply chain management policy (available in multiple languages on Constellium's website (https://www.constellium.com/sustainability/downloads/policies-codes-conduct)). The supplier code of conduct is in line with criterion 1.2 of the ASI Performance Standard and covers: - Labor and Human Rights - Environment, Health, Safety and Energy - Business Ethics (anti-corruption) - and Sustainable Procurement. Suppliers are required to sign the supplier code of conduct (or they have a matching one and they commit to adhere to that).
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has issued and communicated a supplier code of conduct and also a responsible supply chain management policy (available in multiple languages on Constellium's website (https://www.constellium.com/sustainability/downloads/policies-codes-conduct)). The code of conduct covers: - Labor and Human Rights - Environment, Health, Safety and Energy - Business Ethics - and Sustainable Procurement. Suppliers are required to sign the supplier code of conduct (or they have a matching one and they commit to adhere to that).
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has issued and communicated a supplier code of conduct and also a responsible supply chain management policy (available in multiple languages on Constellium's website (https://www.constellium.com/sustainability/downloads/policies-codes-conduct)). The code of conduct covers: - Labor and Human Rights - Environment, Health, Safety and Energy - Business Ethics - Sustainable Procurement - and acceptance to be assessed against these principles (like "human rights due diligence"). Suppliers are required to sign the supplier code of conduct (or they have a matching one and they commit to adhere to that).
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has issued and communicated a supplier code of conduct and also a responsible supply chain management policy (available in multiple languages on Constellium's website (https://www.constellium.com/sustainability/downloads/policies-codes-conduct)). The code of conduct covers: - Labor and Human Rights - Environment,

CRITERION	RATING	COMMENT
		Health, Safety and Energy - Business Ethics (including Export/Import restrictions and regulations and sourcing of Conflict Minerals, Dodd Franck Act). - and Sustainable Procurement. Suppliers are required to sign the supplier code of conduct (or they have a matching one and they commit to adhere to that).
7.2 Risk assessment	Conformance	The Entity runs a risk oriented, documented, due diligence process for its suppliers. This process includes the need for measurable risk mitigation in the event of identified potential or actual adverse impacts. The process is described in Constellium's responsible supply chain management policy, which can be accessed in multiple languages via the following link: https://www.constellium.com/sustainability/download/policies-codes-conduct
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 https://www.constellium.com/contact and the E-mail address Sustainability@constellium.com .
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 system is 12 months starting from the first day of the calendar year.

CRITERION	RATING	COMMENT
8.4 Input Percentage	Conformance	The input percentage for a given material accounting period is calculated using the formula prescribed in criterion 8.4 of the ASI CoC standard.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
8.6 Output Quantity determination	Conformance	The input percentage for a given material accounting period is used to calculate the output quantity (by mass).
8.7 Output Quantity designation	Conformance	By system design it is ensured that the output quantity of CoC material, which may form part of the total production, will be designated as 100% of the CoC material.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	By system design the Entity has ensured that the input percentage for a given material accounting period is used to determine the output quantity of eligible scrap (pre-consumer scrap from its processing).
8.9 Outputs not exceed inputs	Conformance	By system design it is ensured that the total output of CoC material and eligible scrap does not proportionally exceed the input percentage as applied to total input of CoC material and eligible scrap over the material accounting period.
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; - the internal overdraw will not exceed the amount of CoC material affected by the force majeure situation - and the internal overdraw will be made up within the subsequent material accounting period.
8.10b Internal Overdraws (not exceed affected amount)	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; - the internal overdraw will not exceed the amount of CoC material affected by the force majeure situation - and the internal overdraw will be made up within the subsequent material accounting period.
8.10c Internal Overdraws (period to make up)	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; - the internal overdraw will not exceed the amount of CoC material affected by the force majeure situation

CRITERION	RATING	COMMENT
		- and the internal overdraw will be made up within the subsequent material accounting period.
8.11a Positive Balance (carry over)	Conformance	The Entity's material accounting system is designed to ensure that - the accounting system does clearly identify any carry over of a positive balance, - where the Entity has a positive balance of output CoC material at the end of a given material accounting period, this will be carried over to the subsequent material accounting period but will be either drawn down or expire at the end of that subsequent accounting period.
8.11b Positive Balance (expiry)	Conformance	The Entity's material accounting system is designed to ensure that - the accounting system does clearly identify any carry over of a positive balance, - where the Entity has a positive balance of output CoC material at the end of a given material accounting period, this will be carried over to the subsequent material accounting period but will be either drawn down or expire at the end of that subsequent accounting period.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has a system that can produce, control and store CoC documents. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2a Date of issue	Conformance	The Entity has a system that can produce CoC documents with a date of issue. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2b Reference number	Conformance	The Entity has a system that can produce CoC documents with a reference number. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2c Issuing Entity	Conformance	The Entity has a system that can produce CoC documents with the Issuing Entity. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2d Receiving customer	Conformance	The Entity has a system that can produce CoC documents with the receiving customer. At the time of the audit, there were no examples of effective

CRITERION	RATING	COMMENT
		implementation as the Entity has not yet sourced CoC Material.
9.2e Responsible employee	Conformance	The Entity has a system that can produce CoC documents with the responsible employee. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2f Conformance statement	Conformance	The Entity has a system that can produce CoC documents with a conformance statement. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2g Type of CoC Material	Conformance	The Entity has a system that can produce CoC documents with the type of CoC material. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2h Mass of CoC Material	Conformance	The Entity has a system that can produce CoC documents with the mass of CoC material. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.2i Mass of total material	Conformance	The Entity has a system that can produce CoC documents with the mass of total material. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.3a Sustainability Data (optional)	Conformance	The Entity has established a template for issuing CoC documents and will communicate its European average GHG emissions upon customer request. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.3b Sustainability Data (passing on)	Conformance	The Entity has established a template for issuing CoC documents and will communicate its European average GHG emissions upon customer request. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has established a template for issuing CoC documents and will integrate its ASI Certification status for the ASI Performance Standard for the Entity. At the time of the audit, there

CRITERION	RATING	COMMENT
		were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.4 Supplementary Information (optional)	Conformance	The Entity has established a template for issuing CoC documents and will communicate supplementary data upon customer request with well documented objective evidence. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.5 Response to verification requests	Conformance	The Entity has established a procedure for managing CoC communication with customers. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
9.6 Error management	Conformance	The Entity has implemented a procedure for managing its CoC documents as required by the ASI Chain of Custody Standard and a management system of potential errors. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has implemented a procedure with verification steps to review the completeness of received CoC documents as required by the ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
10.2 Verify consistency with shipments	Conformance	The Entity has implemented a procedure with verification steps to review the consistency of received CoC documents as required by the ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has implemented a procedure with verification steps to review the supplier CoC Certification status of received CoC documents as required by the ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
10.4 Error management	Conformance	The Entity has implemented a procedure to review received CoC documents as required by the ASI Chain of Custody Standard and a management system of potential errors. At the time of the audit,

CRITERION	RATING	COMMENT
		there were no examples of effective implementation as the Entity has not yet sourced CoC Material.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.1b Link to Casthouse Products	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.1c No double counting	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2a Date of issue	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2b Reference number	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2c Issuing Entity	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2d Receiving Entity	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2e Conformance statement	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2f ASI Credits statement	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.2g Quantity	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3b Material Accounting System – purchasing	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3c Expiry	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3d No re-trading	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3e No allocation to physical products	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.

CRITERION	RATING	COMMENT
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable as the Entity does not intend to use the Market Credit System for the time being.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity has established internal procedures and prepared internal trainings to ensure any external communication is consistent with the ASI Claim Guide. Any external communication is controlled centrally by the Entity's Headquarters.
12.1b Verifiable evidence	Conformance	The Entity has established internal procedures to ensure any external communication is consistent with the ASI Claim Guide and only verifiable claims are made.
12.1c Employee training	Conformance	The Entity has established internal procedures and prepared trainings to ensure any external communication is consistent with the ASI Claim Guide.

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CONSTELLIUM NEUF-BRISACH

CERTIFICATE
NUMBER

83

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

26 JUNE 2020

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25 JUNE 2021

CERTIFIED SINCE

26 JUNE 2020

AUTHORISED BY

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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

Casting, rolling, finishing and recycling facilities of
Constellium Neuf-Brisach site (France).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium Neuf-Brisach
CERTIFICATION SCOPE	Casting, rolling, finishing and recycling facilities of Constellium Neuf-Brisach site (France).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">First Certification Audit
AUDIT FIRM	GUTcert (ANFOR Group)
AUDIT DATE	<ul style="list-style-type: none">27 . 29 May 2020
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">13 June 2020
AUDIT SCOPE	<p>The audit scope covered: Complete site of Constellium Neuf-Brisach site (France), including casting, rolling, finishing and recycling facilities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p>At the time of the audit, access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken 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">• Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none">☑ 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	26 June 2020 - 25 June 2021
NEXT AUDIT TYPE	Surveillance audit
NEXT AUDIT DUE DATE	25 December 2020
CERTIFICATE NUMBER	83

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented systems and procedures for legal watch and ensure compliance with Law applicable. Corporate supports the Entity with legal council. Employees awareness on legal topics is raised through communication and training.
1.2 Anti-Corruption	Conformance	Consistent with French law and prevailing international standards, the Entity has implemented several processes, procedures to work against corruption. Notable amongst those are: codes of conduct widely communicated, a risk assessment, trainings, whistleblowing mechanisms, internal and external controls. The corporation reports periodically on anti-corruption in its annual sustainability report, that can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports
1.3 Code of Conduct	Conformance	Entity's Headquarters has implemented a worldwide code of conduct including principles relevant to environmental, social and governance performance that can be found via the following link https://www.constellium.com/sustainability/downloads/policies-codes-conduct On the Neuf-Brisach Plant, the Code of Conduct is effectively implemented and communicated to the interested parties.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains policies, at Corporate and/or local level, consistent with the environmental, social and governance practices included in the ASI Performance Standard. Main Corporate policies can be found via the following link https://www.constellium.com/sustainability/downloads/policies-codes-conduct .
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has senior management endorsement and support through provision of resources. Policies are endorsed by senior management and regularly reviewed.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates the policies internally and externally (on the company website and intranet). The supplier code of conduct is also actively communicated to the suppliers.
2.2 Leadership	Conformance	The Entity's plant manager has the overall responsibility and authority for ensuring conformance with ASI Standard and to ensure sufficient resources to support its implementation. 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 environmental management system according to ISO 14001 and an energy management system according to ISO 50001. These systems are certified by an accredited certification body.
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 has implemented a responsible sourcing Policy covering environmental, social and governance issues. It includes, in particular, signature of the Supplier Code of Conduct, supplier mapping and due diligence procedures. The responsible sourcing Policy can be found via the following link https://www.constellium.com/sustainability/downloads/policies-codes-conduct
2.5 Impact Assessments	Conformance	The Entity has implemented processes to perform environmental, social, cultural and Human Rights Impact Assessments for new projects or major changes. Consultation with internal and external stakeholders is included. The site is located in a highly regulated country (France), where major projects and changes must undergo a thorough analysis and authorization process.

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	The Entity has developed its site specific emergency response plans (internal operational plan, continuity plans) in collaboration with potentially affected stakeholders. Regular drills are performed.
2.7 Mergers and Acquisitions	Conformance	Mergers & acquisitions are not managed at local level but by corporate headquarters. In a merger or acquisition case, an environmental, social and governance due diligence process is activated according to a Corporate process.
2.8 Closure, Decommissioning and Divestment	Conformance	Closure, decommissioning and divestments are not managed on local level but by corporate headquarter. In this case, an environmental, social and governance due diligence process is activated.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity publicly discloses its governance approach and its material environmental, social and economic impacts at Corporate level, through Business and Sustainability performance reports in line with GRI (Global Reporting Initiative) guidelines, that can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports These reports are verified by third-party auditors.
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law, at corporate level in the Business and sustainability performance report. The last report of 2018 mentions that there was no major and significant non-compliance issue during this year for the whole corporation. A copy of the latest sustainability report can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports (See GRI 205-3, 307-1, 406-1, 416-2, 419-1 in the GRI part of the report).
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, procedures and processes related to payments to governments. This topic is covered by the Code of Conduct. Only legal and obligatory payments related to taxes and duties

CRITERION	RATING	COMMENT
		are paid. SOX (Sarbanes-Oxley) rules are applied to ensure the transparency of payments to governments. Periodic audits are conducted. No issues are identified.
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	Unable to Rate	The Entity has implemented various accessible, transparent, understandable, culturally and gender sensitive channels to address stakeholder complaints, grievances and requests, especially the work council, a site committee with external stakeholders, a hotline, the website etc. However, due to the coronavirus context, it was not possible to interview internal and external stakeholders. Thus, even if the Entity practices seem sound, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.
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 lines of the Neuf-Brisach plant. These assessments have been externally verified and will be updated. A copy of the current LCA summaries can be found via the following link: https://www.constellium.com/sustainability/life-cycle-assessments .
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: https://www.constellium.com/sustainability/life-cycle-assessments .
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

CRITERION	RATING	COMMENT
		of the current LCA summaries can be found via the following link: https://www.constellium.com/sustainability/life-cycle-assessments .
4.2 Product design	Conformance	During a new product development, desired by customers, sustainability checks are performed. It integrates clear sustainable performance assessments on main impacts (energy, climate, waste, resources, social, health and safety) and objectives.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has implemented a process to minimize aluminium process scrap and it has been minimized the last years. 100% of scrap is recycled internally.
4.3b Aluminium Process Scrap (alloy separation)	Unable to Rate	The Entity has implemented various procedures to segregate internal scrap for recycling. This has been verified through interview and documents. However, due to the coronavirus context, it was not possible to perform a site tour to check the segregation. Thus, even if the Entity practices seem sounds, the criteria was assessed as Unable to Rate until Site tour can be performed. This site tour is already planned in the months to come.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity recycles products at end-of-life from its customers. The Entity's Headquarters also has a consistent and detailed recycling strategy, including specific timelines, activities and targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity's Headquarters engage with collection and recycling systems at various levels to support recycling of products at end of life and raise awareness on recycling. For instance, the Entity is member of the Recycling division of the European Aluminium Association, of France Aluminium recycling and participates in the "Every can counts" program.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity publicly discloses on a yearly basis, at corporate level, GHG emissions and energy use by source in the Business and Sustainability Performance Report and in the CDP (Carbon Disclosure Project) answer. All documents are available on Constellium website, via the

CRITERION	RATING	COMMENT
		following link: https://www.constellium.com/sustainability/downloads/disclosure-and-certifications .
5.2 GHG emissions reductions	Conformance	The Entity's Headquarters has published a corporate time-bound greenhouse gas emissions reduction target in its sustainable report, available via https://www.constellium.com/sustainability/sustainability-core-our-business . The Entity publicly discloses its time-bound greenhouse gas emissions target on its website, available via the following link: https://www.constellium.com/neuf-brisach-france-aluminium-manufacturing-plant-constellium . It addresses both direct and indirect emissions. It was retraced that both targets are related and consistent.
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 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: https://www.constellium.com/sustainability/downloads/brochures-reports see p63 GRI 305-7) For Neuf-Brisach plant, emissions to the air are under tight control according to local regulations and permits. Plans are implemented to reduce their impacts.
6.2 Discharges to Water	Conformance	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: https://www.constellium.com/sustainability/downloads/brochures-reports (see p63 GRI 306-1) For Neuf-Brisach plant, discharges to water are under tight control according to local regulations and permits. Plans are implemented to reduce their impacts.

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity conducts regular assessment of the major risks of spills and leakage through various risk analysis, checked by the French Authority and/or covered by the ISO 14001 certification.
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. This system is regularly inspected by the French Authority.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented procedures to disclose significant spills to affected parties, immediately after an incident.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publicly reports, at corporate level, significant spills yearly in the Business and sustainability report, that can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports (see p68 GRI 306-3) No event to report for the plant.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy, at corporate and local level. A corporate target is defined to reduce landfilling. Waste management is included within the ISO 14001 certified management system.
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: https://www.constellium.com/sustainability/downloads/brochures-reports (see p47 and 64).
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.

CRITERION	RATING	COMMENT
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 has implemented processes to maximise the recovery of aluminium by treatment of dross and dross residues. 100% of the dross is gathered, segregated per alloy group and recycled internally or externally. No dross is landfilled.
6.8b Dross (recycling)	Conformance	The Entity has implemented processes to maximise the recycling of treated dross residues. Actually, all dross residues are recycled internally or externally. There is no landfilling.
6.8c Dross (review of alternatives)	Conformance	The Entity recycles internally and externally all dross residues. We could verified that there is no landfilling.
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. Main withdrawal is groundwater for process cooling water.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed the current and forecast water-related risks within its Area of Influence (limited to the plant area). The assessment shows a low risk level regarding water.
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.

CRITERION	RATING	COMMENT
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	<p>The Entity discloses, at corporate level, its water withdrawals and uses in its 2018 annual sustainability report that can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports (p.63 and 68 GRI-303-3).</p> <p>The Entity discloses its material water-related risks within the Carbon Disclosure Project (CDP) water assessment that can be found via the following link: https://www.constellium.com/sustainability/downloads/disclosure-and-certifications</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity has assessed the risk and materiality of the impacts on biodiversity, within its Area of Influence (limited to the plant area including the 110ha forest.</p> <p>The assessment shows a low risk level regarding biodiversity. Main biodiversity topic is the forest and its fauna, which is under a forest management plan with a public entity.</p>
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.
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 takes preventive actions (such as transportation 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.

CRITERION	RATING	COMMENT
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.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has defined and communicated a Human Rights and labor practices Policy and also a commitment to respect of Human Rights within its Code of Conduct. They both can be found at the following link : https://www.constellium.com/sustainability/downloads/policies-codes-conduct
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Human Rights Due Diligence process through corporate and local risk assessments. Specific due diligences are performed regarding suppliers and contractors, according to the responsible sourcing program.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has not caused or contributed recently to adverse human rights impacts. In the event, the Entity has implemented processes to cooperate in the remediation through legitimate processes.
9.2 Women's Rights	Unable to Rate	The Entity has implemented Policies and processes to ensure respect for the rights and interests of women, consistent with international standards. A specific improvement program is ongoing at corporate level and at the Neuf-Brisach plant. However, due to the coronavirus context, it was not possible to interview stakeholders. Thus, even if the Entity practices seem sound, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.
9.3 Indigenous Peoples	Not Applicable	There are no indigenous people present in the area (Alsace region of France).
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no indigenous people present in the area (Alsace region of France).

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Not Applicable	The Entity is not located in any protected area around sacred or cultural heritage sites.
9.6a Resettlements (avoid or minimise)	Not Applicable	There are no resettlements being considered or taking place during the period since joining ASI or expected to occur during the certification period.
9.6b Resettlements (where unavoidable)	Not Applicable	There are no resettlements being considered or taking place during the period since joining ASI or expected to occur during the certification period.
9.7a Local Communities (rights and interests)	Unable to Rate	The Entity is committed to respect the legal and customary rights and interests of local communities. According to the due diligence process, there is no rural/remote community dependent upon resources that may be affected by the Entity's operations. However, due to the coronavirus context, it was not possible to interview internal and external stakeholders. Thus, even if the Entity practices seem sound, the criteria was assessed as 'Unable to Rate' until interviews with stakeholders can be performed. These interviews are already planned in the months to come.
9.7b Local Communities (impacts)	Unable to Rate	According to the due diligence process, there is no rural/remote community dependent upon resources that may be affected by the Entity's operations. However, the Entity has implemented processes to prevent and address any adverse impacts on local Community livelihoods resulting from its activities. A site Committee with representatives of local communities takes place periodically. There is no recent complaint. However, due to the coronavirus context, it was not possible to interview internal and external stakeholders. Thus, even if the Entity practices seem sound, the criteria was assessed as 'Unable to Rate' until interviews with stakeholders can be performed. These interviews are already planned in the months to come.
9.7c Local Communities (livelihoods)	Conformance	The Entity's activity creates direct and indirect jobs locally. The Entity has a proactive approach of working with local communities and neighbourhood

CRITERION	RATING	COMMENT
		organizations to improve and support mutual interests, through for instance participations to local events and donations to schools and hospitals.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has a strong policy to not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. Risks assessments of suppliers are performed. Public disclosure of the absence of exposure, through the Responsible Minerals Initiative, is available at https://www.constellium.com/sustainability/downloads/disclosure-and-certifications
9.9 Security practice	Conformance	The Entity respects Human Rights in line with good practices in its security practices. The Entity facility uses the services of an external security provider. Security guards are unarmed and trained. No specific risks related to security practices are identified in the provider's assessment. There is no known human rights violation caused by the security service, on the facility.
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 associate freely in Labour Unions at Corporate and plant level. A specific agreement with Labour Unions exists at Neuf-Brisach. The Worker council (Conseil social et économique) is freely elected.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to collective bargaining. A specific agreement with Labour Unions exists at Neuf-Brisach.
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 France.
10.2a Child Labour (minimum age)	Conformance	The Corporate Entity strictly prohibits child labour that is not in accordance with the conventions of the International Labour. At Neuf-Brisach plant, minimum working age is 18. There is in fact no employment of workers under 18 on the facility. Regarding suppliers, a due diligence process about child labour is also implemented.

CRITERION	RATING	COMMENT
10.2b Child Labour (hazardous)	Conformance	<p>The Corporate Entity strictly prohibits child labour that is not in accordance with the conventions of the International Labour.</p> <p>At Neuf-Brisach plant, minimum working age is 18. There is in fact no employment of workers under 18 on the facility.</p> <p>Regarding suppliers, a due diligence process about child labour is also implemented.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Corporate Entity strictly prohibits child labour that is not in accordance with the conventions of the International Labour.</p> <p>At Neuf-Brisach plant, minimum working age is 18. There is in fact no employment of workers under 18 on the facility.</p> <p>Regarding suppliers, a due diligence process about child labour is also implemented.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>There is no requirement in any labour agreement, employee handbook or agreement with a recruiting firm that requires the employees to pay any type of fee or advance.</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>There is no requirement in any labour agreement, employee handbook or agreement with a recruiting firm that requires workers (migrant or no) to lodge deposits or security payments at any time.</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>There is no practice of debt bondage.</p>

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>At Neuf-Brisach plant, workers are free to leave their working places.</p>
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>At Neuf-Brisach plant, no original copies of workers' identity papers, work permits, travel documents or training certificates are held.</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>At Neuf-Brisach plant, conditions of termination of working contracts are defined by French law, collective bargaining agreements and described in personal worker contracts.</p>
10.4 Non-Discrimination	Unable to Rate	<p>The Entity has documented its commitment to equal opportunities and zero tolerance to discrimination in its code of conduct that can be found via the following link https://www.constellium.com/sustainability/downloads/policies-codes-conduct.</p> <p>At Constellium Neuf-Brisach plant, the commitment to equal opportunities and no discrimination is recalled and communicated. No recent case of discrimination brought to the French labour justice.</p> <p>However, due to the coronavirus context, it was not possible to interview stakeholders. Thus, even if the Entity practices seem sounds, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.</p>
10.5 Communication and engagement	Unable to Rate	<p>The Entity has an open and inclusive communication process between management, workers and unions. It allows to raise concerns, report non-conformities and to suggest improvements</p>

CRITERION	RATING	COMMENT
		However, due to the coronavirus context, it was not possible to interview internal and external stakeholders. Thus, even if the Entity practices seem sounds, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.
10.6 Disciplinary practices	Unable to Rate	<p>The Entity prohibits the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers.</p> <p>The rules for disciplinary practices are documented and communicated to workers, in accordance with French law.</p> <p>However, due to the coronavirus context, it was not possible to interview internal and external stakeholders. Thus, even if the Entity practices seem sounds, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.</p>
10.7a Remuneration (living wage)	Conformance	The Entity pays wages according to French regulations and agreements with Labor Unions. These wages exceed the legal or industry minimum standard.
10.7b Remuneration (method of payment)	Conformance	At Neuf-Brisach Plant, payments of wages are conducted monthly in a punctual manner. All workers are getting payslips with payments details.
10.8 Working Time	Conformance	The Entity complies with French applicable Law and the local collective agreement of the metal industry on working Time, overtime working hours, public holidays and paid annual leave. An agreement concerning shorter working hours also exists, in accordance with French Law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has an occupational health and safety policy and management system certified OHSAS 18001:2007 by an accredited certification body.</p> <p>The Entity has implemented and communicated its OHS policy, with strong leadership of top management.</p>

CRITERION	RATING	COMMENT
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. This system applies to all workers and visitors present in any area or activity under its control.
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. A commitment to comply with OHS standards and regulations is documented in the Entity's health and safety Policy.
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. Worker's right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work is included in the Entity's health and safety Policy and its "Règlement intérieur" (Internal Rules).
11.2 OH&S Management System	Conformance	The Entity has an occupational health and safety management system certified OHSAS 18001:2007 by an accredited certification body.
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 management and in particular a joint health and safety committee.
11.4 OH&S performance	Conformance	The Entity has an occupational health and safety management system certified OHSAS 18001:2007 by an accredited certification body. The Entity evaluates its OHS performance through various lagging and leading indicators.

Document Control and Version History

Revision	Date	Notes
0	26 June 2020	Issued (Initial certification audit)