
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 2019

DATE OF EXPIRY

27 JULY 2022

CERTIFIED SINCE

28 JULY 2019

AUTHORISED BY

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