

RESPONDING TO OUR MATERIALITY ASSESSMENT

Constellium conducted its second Materiality Assessment in 2017-2018. By asking internal and external stakeholders, we developed a series of actions to align our sustainability efforts with their priorities.

Human Rights

We strengthened Constellium's human rights and labor practices policies, so that they are aligned with the UN Guiding Principles on Business and Human Rights and other internationally recognized standards. We established these principles not only for our own operations and employees, but for our business partners and suppliers, too. The policy appears in our new Code of Conduct, published in several languages. We also incorporated the topic of human rights into our Responsible Supply Chain Management Policy, implemented via our supply chain due diligence process.

In the fourth quarter of 2018, we launched a human rights due diligence process with the help of Shift, a non-profit organization, to assess existing or potential risks across our operations. Our Sustainability team conducted workshops with the management teams of several of our plants in different business units and geographic locations. At this early stage of the process, we could see that our own operations do not generate major risks of human rights violations, but we identified areas of risk and areas that could be improved, related to the nature of a plant's

operations, its development phase, size, local culture, applicable regulations, and/or social situation.

In April 2019, we organized a global workshop with leadership from different key functions to discuss these risks. It produced a Constellium human rights heat map which was presented to the Executive Committee. Now that we have a global understanding of the risks, we are working on an action plan to mitigate them. Some of our next steps are to provide more extensive training on our Code of Conduct and to work on increasing gender diversity. We are also developing an e-learning course, expected to be available in 2019.

Business Ethics

We reworked our Supplier Code of Conduct to take into account our human rights and labor practices policies, as well as new legislation against corruption. As a result, compliance and sustainability now go hand in hand. Our anti-corruption due diligence process now contains both legal and sustainability requirements, especially in our supply chain.

Communication and Training

We have made progress on both topics. We created onsite sustainability training sessions for Sales, Purchasing, and R&D functions, and an e-learning module is under development. We also increased the frequency of internal communications about our achievements. We communicate regularly with our customers on our sustainability targets and meet with industry associations and NGOs, particularly through our engagement with the Aluminium Stewardship Initiative and multi-stakeholder awareness programs such as Every Can Counts.

Reducing the Impact of Operations

This topic is high on our sustainability agenda, especially the two most material items: reducing landfill waste and increasing energy efficiency. Both are part of our 2020 sustainability targets. We work to ensure that our employees fully understand these concepts and make them part of their daily work routines at all our sites. (See pp. 47-48 for more information.)

Our GHG Target

Reducing our carbon footprint is still a work in progress. We have defined targets for certain sites, but a global approach has proven to be more challenging, due to the evolution of both our production volumes and product mix. We expect to establish an overall target and will communicate it at that time.

“Shift is pleased to support Constellium as the company starts identifying potential human rights risks across its value chain, and exploring ways to mitigate them.”

Susannah McLaren,
Advisor, Shift

THE PRIORITIES OF INTERNAL AND EXTERNAL STAKEHOLDERS

Note: This graph shows only the scores that received a minimum of 8 out of 10 in terms of importance to stakeholders.



- 1. ● Recycling
- 2. ● Being innovative
- 3. ● Improving customer satisfaction
- 4. ● Developing products with environmental benefits
- 5. ● Ensuring gender equity*
- 6. ● Improving safety at work
- 7. ● Preventing pollution
- 8. ● Reducing use of harmful substances
- 9. ● Reducing GHG emissions
- 10. ● Energy efficiency
- 11. ● Increasing economic performance
- 12. ● Reducing landfill waste
- 13. ● Preventing forced/compulsory labor
- 14. ● Enforcing the respect of human rights
- 15. ● Business ethics
- 16. ● Complying with public policies
- 17. ● Enforcing freedom of association
- 18. ● Preventing child labor
- 19. ● Responsible purchasing
- 20. ● Transparency and respect of confidentiality

*We included this topic in the matrix because of its high rating despite the small number of external stakeholders who rated it (10).