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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# TRIMET FRANCE

CERTIFICATE  
NUMBER

189

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DEKRA  
CERTIFICATION

DATE OF ISSUE

1 APRIL 2022

DATE OF EXPIRY

31 MARCH 2025

CERTIFIED SINCE

1 APRIL 2022

AUTHORISED BY

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

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*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

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CERTIFICATION SCOPE

Development, manufacture and sale of alloy in the form of wires, slabs and ingots; production of molten aluminium; and manufacture of anodes at the Saint-Jean-de-Maurienne and Castelsarrasin sites (France).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

|                         |  |
|-------------------------|--|
| MEMBER NAME             | TRIMET Aluminium SE  |
| ENTITY NAME             | TRIMET France  |
| CERTIFICATION SCOPE     | Development, manufacture and sale of alloy in the form of wires, slabs and ingots; production of molten aluminium; and manufacture of anodes at the Saint-Jean-de-Maurienne and Castelsarrasin sites (France).   |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul>  |
| ASI STANDARD            | <ul style="list-style-type: none"><li>Performance Standard V2</li></ul>  |
| AUDIT TYPE              | <ul style="list-style-type: none"><li>Initial Certification Audit</li></ul>  |
| AUDIT FIRM              | DEKRA Certification  |
| AUDIT DATE              | <ul style="list-style-type: none"><li>6 – 10 December 2021 (On-site) and 22 December 2021 (Remote)</li></ul>   |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none"><li>8 February 2022</li></ul>  |
| AUDIT SCOPE             | <p>The audit scope includes the development, manufacturing and sale of alloy in the form of wires, plates and ingots, excluding upstream downstream transport; production of molten aluminium and; manufacture of anodes at the Saint-Jean-de-Maurienne and Castelsarrasin sites (France).</p> <p>The audit of the Castelsarrasin site was undertaken remotely, consistent with a multi-site approach for an Initial Certification Audit.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Aluminium Re-melting/Refining</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> |

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AUDIT  
OUTCOME

- Certification

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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.

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CERTIFICATION  
PERIOD

1 April 2022 – 31 March 2025

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NEXT AUDIT  
TYPE

Re-Certification Audit

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NEXT AUDIT  
DUE DATE

31 March 2025

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CERTIFICATE  
NUMBER

189

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## SUMMARY OF FINDINGS

| CRITERION  | RATING      | COMMENT  |
|--|-------------|--|
| PRINCIPLE 1 BUSINESS INTEGRITY   |             |  |
| 1.1 Legal Compliance   | Conformance | The Entity implements a regulatory review as part of a procedure of the Integrated Management System and legal compliance is reviewed by external legal firms.   |
| 1.2 Anti-Corruption  | Conformance | Relevant employees are provided with training in Anti-Corruption. The Entity has established an internal whistleblower procedure which identifies the means of gathering any facts.  |
| 1.3 Code of Conduct  | Conformance | The Entity has adopted the Code of Conduct established by BME (Bundesverband Materialwirtschaft Einkauf und Logistics e V.). The Code commits the Entity to supporting actions in favour of the environment on the part of employees and also includes the support of social and governance performance. |
| PRINCIPLE 2 POLICY & MANAGEMENT  |             |  |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | The Entity's Managerial Policy explicitly covers Corporate Social Responsibility (CSR). The Entity is certified to ISO 9001, ISO 14001, ISO 45001 and ISO 50001.   |
| 2.1b Environmental, Social, and Governance Policy (senior management)      | Conformance | The Entity is certified according to ISO 9001, ISO 14001, ISO 45001 and ISO 50001 which attest to senior management's commitment. Management reviews of the Corporate Social Responsibility (CSR) Policy are conducted annually.   |
| 2.1c Environmental, Social, and Governance Policy (communication)          | Conformance | The Entity is certified according to ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has implemented an Integrated Management System, and has implemented internal and external communication to make its Corporate Social Responsibility (CSR) Policy known to stakeholders.                           |
| 2.2 Leadership   | Conformance | The Entity has a document formalising the appointment of a management representative.  |
| 2.3a Environmental and Social Management Systems (environmental)           | Conformance | The Entity has implemented an ISO 14001 certified Management System.   |
| 2.3b Environmental and Social Management Systems (social)                  | Conformance | The Entity's Management System is certified according to ISO 45001 and includes employee participation in risk assessment. The Entity's  |

| CRITERION                                   | RATING      | COMMENT   |
|---|-------------|---|
|   |             | Corporate Social Responsibility (CSR) approach is outlined in the annual Sustainability Report.   |
| 2.4 Responsible Sourcing                    | Conformance | The Entity has developed and implemented a Code of Conduct for its suppliers and communicates all Corporate Social Responsibility (CSR) aspects to suppliers in the form of requirements.   |
| 2.5 Impact Assessments                      | Conformance | The Entity's projects are systematically implemented using a V-cycle methodology and upstream stages are undertaken in partnership with staff representatives. Impact Assessments are undertaken by the Entity as required by French law.   |
| 2.6 Emergency Response Plan                 | Conformance | An Emergency Response Plan is legally required as the Entity has a high-threshold Seveso classification. The Entity has a POI (internal operations plan), last updated in November 2021 which identifies the scenarios. The fire department collaborates on the emergency exercises and the subsequent report is provided to the Workers' representatives.  |
| 2.7 Mergers and Acquisitions                | Conformance | Mergers and acquisitions are managed by the Entity's parent company TRIMET Aluminum SE.   |
| 2.8 Closure, Decommissioning and Divestment | Conformance | French regulations by the French administration (DREAL) require the Entity to consider environmental, societal and governance issues in the event of a closure. Closure and decommissioning requirements are the responsibility of the Entity's Supervisory Committee.  |
| PRINCIPLE 3 TRANSPARENCY                    |             |   |
| 3.1 Sustainability Reporting                | Conformance | The TRIMET Sustainability Report is prepared in accordance with the Global Reporting Initiative (GRI) guidelines and includes a GRI index and addresses the 17 UN Sustainable Development Goals:<br><a href="https://www.trimet.eu/fr/telechargements/rapports-sur-le-developpement-durable">https://www.trimet.eu/fr/telechargements/rapports-sur-le-developpement-durable</a><br>The Entity has prepared a 2020 Sustainability Report, available for download on the website:<br><a href="https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf">https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf</a><br>(English version) |
| 3.2 Non-compliance and liabilities          | Conformance | The Entity discloses information on non-compliance and liabilities associated with Applicable Law in the Sustainability Report. There were no incidents reported in the 2020 Sustainability Report.   |

| CRITERION   | RATING         | COMMENT  |
|---|----------------|--|
| 3.3a Payments to governments (legal and contractual)                | Conformance    | The Entity's Anti-Corruption policy and processes are established and the Entity does not make payments to government.   |
| 3.3b Payments to governments (disclosure - bauxite mining)          | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 3.4 Stakeholder complaints, grievances and requests for information | Conformance    | Stakeholders can make complaints and requests for information of the Entity via telephone contact with the relevant persons. The Entity registers and handles all requests from interested parties.  |
| PRINCIPLE 4 MATERIAL STEWARDSHIP                                    |                |  |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts)       | Conformance    | The Entity has two Environmental Product Declaration's (EDP's) for electrical wire rod, prepared in response to a customer request. The Entity's Sales Department transmits information on the publication upon customer request.  |
| 4.1b Environmental Life Cycle Assessment (cradle to gate)           | Conformance    | The Entity has two Environmental Product Declaration's (EDP's), which are compliant with EN 15804 and are available upon request.  |
| 4.1c Environmental Life Cycle Assessment (public communication)     | Conformance    | The Entity has two Environmental Product Declaration's (EDP's), which include information on the potential environmental impacts during the life cycle. The Entity provides information on the publication upon customer request.  |
| 4.2 Product design  | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.  |
| 4.3a Aluminium Process Scrap (targets)                              | Conformance    | The Entity recycles 100% of the Aluminium waste and maintains several indicators and figures to ensure an accurate tracking of recycling targets.  |
| 4.3b Aluminium Process Scrap (alloy separation)                     | Conformance    | The Entity has dedicated areas where different waste types are separated. The instructions for remelting are delivered via the Entity's Information Center to determine the quantities that can be used to produce Aluminium.  |
| 4.4a Collection and recycling of products at end-of-life (strategy) | Conformance    | The Entity has a partnership with two customers and a recycling facility to maintain a rate of recycled Aluminium of external origin, which it monitors and supervises.<br>A significant investment in a chip compactor at the Saint-Jean-de-Maurienne site supports its strategic objectives. |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance    | The Entity is committed with several partners to increase the recycling rate and uses indicators to monitor its impact.   |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS                                  |                |   |
| 5.1 Disclosure of GHG emissions and energy use                        | Conformance    | The Entity has prepared a public Sustainability Report which includes data on energy and GHG emissions, refer pages 34 and 40:<br><a href="https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf">https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf</a> (English version)   |
| 5.2 GHG emissions reductions  | Conformance    | The Entity has a decarbonization roadmap which establishes the objective for 2025 of a reduction of Scope 1 and Scope 2 GHG emissions. Regarding indirect emissions, the supply of electrical energy to the sites includes more than 90% carbon-free electricity. Information is disclosed on the website:<br><a href="https://www.trimet.eu/fr/ueber_trimet/nachhaltigkeit/umwelt-und-klimaschutz">https://www.trimet.eu/fr/ueber_trimet/nachhaltigkeit/umwelt-und-klimaschutz</a> |
| 5.3a Aluminium Smelting (management system)                           | Conformance    | The Entity published an annual Sustainability Report which demonstrates the reduction of GHG emissions.   |
| 5.3b Aluminium Smelting (up to and including 2020)                    | Conformance    | The annual Sustainability Report discloses that the Scope 1 and Scope 2 GHG emissions are well below the 8 tonnes CO <sub>2</sub> -eq per metric tonne Aluminium. The Management System establishes objectives and indicators to monitor continuous improvement.  |
| 5.3c Aluminium Smelting (after 2020)                                  | Not Applicable | This Criterion is not applicable as Aluminium smelting activities commenced prior to 2020.  |
| PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE                            |                |   |
| 6.1 Emissions to Air  | Conformance    | The Entity declares its air emissions to the French environmental administration annually. The Entity's Management System is certified according to ISO 14001 with an action plan to address air emissions. The Sustainability Report discloses data on air emissions.  |
| 6.2 Discharges to Water   | Conformance    | The Entity's Management System is certified according to ISO 14001 and Discharges to Water are strictly controlled according to the Entity's permit to operate. The Sustainability Report contains information on the environmental impacts. The French administration (DREAL) regularly monitors the Entity.   |
| 6.3a Assessment and Management of Spills and Leakage (assessment)     | Conformance    | The Entity's Management System is certified according to ISO 14001 which includes the   |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
|   |                | management of environmental risks including Spills and Leakage.   |
| 6.3b Assessment and Management of Spills and Leakage (management) | Conformance    | The Entity's Management System is certified according to ISO 14001. The Entity manages an internal and external communication process with stakeholders and manages Spills through corrective actions to prevent their occurrence.  |
| 6.4a Reporting of Spills (immediate disclosure)                   | Conformance    | The Entity holds an operating license and reports Spills to all the related regulatory declarations which quantify the impacts.   |
| 6.4b Reporting of Spills (regular reporting)                      | Conformance    | The Entity publicly discloses the environmental impact of Spills to the local French environmental administration and in the 2020 Sustainability Report, available for download at the website: <a href="https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf">https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf</a> (English version)   |
| 6.5a Waste management and reporting (strategy)                    | Conformance    | The Entity has an environmental action plan which includes waste management and waste reduction. Actions are implemented in accordance with the Entity's Corporate Social Responsibility (CSR) Policy.  |
| 6.5b Waste management and reporting (disclosure)                  | Conformance    | The Entity publicly discloses waste management and disposal, including quantities of Hazardous and Non-Hazardous Waste in the annual Sustainability Report, available for download at the website: <a href="https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf">https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf</a> (English version)<br>The 2021-2022 waste management plan is documented and is consistent with the disclosure on the website. |
| 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 (state 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)          | Conformance    | The Entity manages Spent Pot Lining (SPL) and Dross to prevent their release into the environment. A third-party advises the Entity to optimize its management.  |
| 6.7b Spent Pot Lining (SPL) (recovery and recycling)          | Conformance    | The Entity has commissioned an external consultant to report on Spent Pot Lining (SPL) optimization which has resulted in the preparation of an environmental action plan.<br>There is no SPL discharged into marine and aquatic environments and internal operations plans are implemented for centennial flood situations. |
| 6.7c Spent Pot Lining (SPL) (Untreated SPL)                   | Conformance    | Spent Pot Lining (SPL) is managed and stored so as not to impact the environment before being disposed of as waste. Landfilling of SPL occurs when necessary following stabilisation.  |
| 6.7d Spent Pot Lining (SPL) (review of alternatives)          | Conformance    | The Entity commissioned an external consultant to report on alternatives to landfilling and stockpiling Spent Pot Lining and an internal process to evaluate alternatives was undertaken in 2021.  |
| 6.7e Spent Pot Lining (SPL) (marine and aquatic environments) | Conformance    | There is no Spent Pot Lining (SPL) discharged into marine and aquatic environments and a centennial flood situation is prevented by an internal operations plan.   |
| 6.8a Dross (recovery)   | Conformance    | The Entity has an internal procedure and a contract with an external metal refiner to maximise the recovery of Dross and Dross residues.   |
| 6.8b Dross (recycling)  | Conformance    | The Entity has a contract with a metal refiner and recycles 100% of Dross.   |
| 6.8c Dross (review of alternatives)                           | Not Applicable | This Criterion is not applicable as Dross volumes are all valorised.   |
| PRINCIPLE 7 WATER STEWARDSHIP                                 |                |  |
| 7.1a Water assessment (mapping)                               | Conformance    | The Entity has updated the mapping of water withdrawals as part of its leak remediation work and is implementing an automated process for the measurement of incoming flows. The Entity communicates water management with stakeholders.   |
| 7.1b Water assessment (risk assessment)                       | Conformance    | The Entity has analysed the risks associated with the supply of cooling water within its Area of Influence and action plans are in place to prevent impact.  |

| CRITERION   | RATING         | COMMENT   |
|---|----------------|---|
| 7.2a Water management (management plans)  | Conformance    | As part of the 2021-2022 environmental action plan, two actions are planned to mitigate risks identified for the water supply. The progress on implementation is regularly reviewed within the framework of the ISO 14001 certified Environmental Management System.  |
| 7.2b Water management (monitoring)  | Conformance    | The ISO 14001 certified Environmental Management System includes evaluation of the effectiveness of water management action plans.  |
| 7.3 Disclosure of water usage and risks   | Conformance    | The Entity responds to all mandatory declarations resulting from the national water agency. The Entity publicly discloses its consumption and significant risks in its Sustainability Report, available on the website: <a href="https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf">https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf</a> (English version) |
| PRINCIPLE 8 BIODIVERSITY  |                |   |
| 8.1 Biodiversity assessment   | Conformance    | A Biodiversity assessment was conducted in 2021 and a subsequent Biodiversity Action Plan is being implemented.<br>An agricultural expert studies the impact of fluorinated emissions on surrounding vegetation annually and monitoring results demonstrate a reduction in impact.  |
| 8.2a Biodiversity management (biodiversity action plans)                            | Conformance    | The Entity's 2021 – 2025 Biodiversity Action Plan specifies eight actions which are being implemented.  |
| 8.2b Biodiversity management (consultation and mitigation hierarchy)                | Conformance    | The Biodiversity Mitigation Hierarchy is respected for each of the actions included in the Biodiversity Action Plan. The Plan is available for consultation within the Entity.  |
| 8.2c Biodiversity management (reporting)  | Conformance    | The Entity reports on Biodiversity outcomes in the 2020 Sustainability Report, refer pages 43 - 45: <a href="https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf">https://www.trimet.eu/fileadmin/downloads/en/Sustainability_reports/TRIMET_RAPPORT_FR_11122021.pdf</a> (English version)   |
| 8.3 Alien Species   | Conformance    | The Entity's Biodiversity Action Plans includes actions to avoid the introduction of Alien Species that could harm 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 mines)            | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope.   |

| CRITERION  | RATING         | COMMENT   |
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| 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 developed a Charter of Human Rights and Working Conditions which is provided to new employees and subcontractors.  |
| 9.1b Human Rights Due Diligence (process)            | Conformance    | The Entity conforms to European and French law on the protection of the Human Rights for employees and subcontractors. The commitment is communicated via the Charter of Human Rights and Working Conditions.   |
| 9.1c Human Rights Due Diligence (remediation)        | Conformance    | The Entity has appointed a person responsible for verifying that the Entity meets all of its commitments in terms of Human Rights and compliance with the company Charter, which is communicated to stakeholders. The responsible person consults with management and leads any required remediation. |
| 9.2 Women's Rights                                   | Conformance    | The Entity respects the French law on gender equality and organizes consultation on these subjects with the unions in several meetings throughout the year.   |
| 9.3 Indigenous Peoples                               | Not Applicable | This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.  |
| 9.4 Free, Prior, and Informed Consent (FPIC)         | Not Applicable | This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.  |
| 9.5 Cultural and sacred heritage                     | Not Applicable | This Criterion is not applicable as there are no cultural and sacred heritage sites or values as part of the Entity's Area  |
| 9.6a Resettlements (avoid or minimise)               | Not Applicable | This Criterion is not applicable as there is no Resettlement necessary as there are no Indigenous Peoples within the Entity's Area of Influence.  |
| 9.6b Resettlements (where unavoidable)               | Not Applicable | This Criterion is not applicable as there is no Resettlement necessary as there are no Indigenous Peoples within the Entity's Area of Influence.  |
| 9.7a Local Communities (rights and interests)        | Conformance    | The Entity has no plans to expand the footprint of its sites. The Entity supports associations and local organisations with financial assistance.   |

| CRITERION  | RATING         | COMMENT   |
|--|----------------|---|
| 9.7b Local Communities (impacts)   | Conformance    | The Entity supports associations and local organisations with financial assistance.   |
| 9.7c Local Communities (livelihoods)   | Conformance    | The Entity offers financial assistance to sports clubs and local humanitarian associations.   |
| 9.8 Conflict-Affected and High-Risk Areas  | Conformance    | The Entity has a procedure to avoid contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.   |
| 9.9 Security practice  | Conformance    | The Entity has a security provider that respects its Corporate Social Responsibility (CSR) Policy.  |
| PRINCIPLE 10 LABOUR RIGHTS   |                |   |
| 10.1a Freedom of Association and Right to Collective Bargaining (freedom of association) | Conformance    | The Entity respects the French law requiring it to adhere to a Collective Agreement.  |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)  | Conformance    | The Entity respects the French law requiring it to adhere to a Collective Agreement.  |
| 10.1c Freedom of Association and Right to Collective Bargaining (alternative means)      | Not Applicable | This Criterion is not applicable as French law does not restrict the right to Freedom of Association and Collective Bargaining.   |
| 10.2a Child Labour (minimum age)   | Conformance    | The Entity complies with French law which prohibits Child Labour and the Entity makes responsible purchases using its Code of Conduct established by BME (Bundesverband Materialwirtschaftl Einkaufund logistics e V.).                                 |
| 10.2b Child Labour (hazardous)   | Conformance    | The Entity complies with French law which prohibits Child Labour. The Entity respects Collective Agreements and makes responsible purchases using its Code of Conduct established by BME (Bundesverband Materialwirtschaftl Einkaufund logistics e V.). |
| 10.2c Child Labour (worst forms)   | Conformance    | The Entity respects Collective Agreements and French law that protects against Child Labour and does so through a Code of Conduct established by BME (Bundesverband Materialwirtschaftl Einkaufund logistics e V.).                                     |
| 10.3a Forced Labour (human trafficking)  | Conformance    | The Entity has a Corporate Social Responsibility (CSR) Policy, respects French law and does not engage in nor support the use of Forced Labour.   |
| 10.3b Forced Labour (deposits, fees, advances)   | Conformance    | The Entity has a Corporate Social Responsibility (CSR) Policy, respects French law and does not   |

| CRITERION   | RATING      | COMMENT  |
|---|-------------|--|
|   |             | engage in nor support the use of Forced Labour. Deposits, fees or security payments are not required.  |
| 10.3c Forced Labour (migrant workers)                                     | Conformance | The Entity has a Corporate Social Responsibility (CSR) Policy, respects French law and does not engage in nor support the use of Forced Labour. Deposits, fees or security payments are not required.  |
| 10.3d Forced Labour (debt bondage)  | Conformance | The Entity has a Corporate Social Responsibility (CSR) Policy, respects French law and does not engage in nor support the use of Forced Labour. Deposits, fees or security payments are not required.  |
| 10.3e Forced Labour (freedom of movement)                                 | Conformance | The Entity has a Corporate Social Responsibility (CSR) Policy, respects French law and does not engage in nor support the use of Forced Labour.  |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | The Entity is not involved in Forced Labour and only stores copies of the original documents necessary to comply with French labour laws.  |
| 10.3g Forced Labour (freedom to terminate employment)                     | Conformance | The Entity respects the Collective Agreement and French labour law for announcing termination of the working contract.   |
| 10.4 Non-Discrimination   | Conformance | The Entity is committed to Non-Discrimination and communicates this commitment in its Human Rights Code of Conduct. The Entity expects the same from its suppliers in its Supplier Code of Conduct. The French law which requires public disclosure on the gender equality index is respected. |
| 10.5 Communication and engagement   | Conformance | The Entity uses mandatory Social Commissions provided for under the Labour Code to ensure employees participate and representation regarding their working conditions.   |
| 10.6 Disciplinary practices   | Conformance | The Entity respects its employees and disciplinary measures are regulated by law and outlined in an internal document provided to all new employees.   |
| 10.7a Remuneration (living wage)  | Conformance | The Entity has established Collective Agreements and wages are in accordance with the Agreement.   |
| 10.7b Remuneration (method of payment)                                    | Conformance | All wage payments are documented and submitted on the 30 <sup>th</sup> of the current month to the Workers bank accounts.  |
| 10.8 Working Time   | Conformance | Working hours are recorded electronically and paid monthly. Management of the Working Time respects the French law.  |

| CRITERION   | RATING      | COMMENT   |
|---|-------------|---|
| PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY                                       |             |   |
| 11.1a Occupational Health and Safety (OH&S) Policy (policy)                       | Conformance | The Entity's Corporate Social Responsibility (CSR) Policy is widely communicated to all stakeholders. The Management System is certified according to ISO 45001 which demonstrates that an Occupational Health and Safety Policy is well implemented and communicated.  |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)         | Conformance | The Entity's Corporate Social Responsibility (CSR) Policy is widely communicated to all stakeholders. Workers and subcontractors are informed of the health and safety risks and the required preventive measures.  |
| 11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards) | Conformance | The Entity's Occupational Health and Safety Policy complies with international standards and applicable ILO Conventions. The Sustainability Report discloses the results of performance against health and safety Key Performance Indicators (KPI's).   |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)    | Conformance | The Workers' representatives meet with management annually to review the mandatory documents on health and safety risks. Workers are aware of their right to stop unsafe work and the safety video at the site's reception areas further inform of the right to refuse dangerous work.  |
| 11.2 OH&S Management System   | Conformance | The Entity's Management System is certified according to ISO 45001 and the December 2020 audit found no non-conformities.   |
| 11.3 Employee engagement on health and safety                                     | Conformance | The Entity's Management System is certified according to ISO 45001 and consults with Workers on Occupational Health and Safety (OH&S) matters. The Entity implements a Social and Economic Commission (CSE), as required by French law, where management and Workers representatives meet on OH&S at least four times per year. The Entity has an intranet-based tool to allow Workers and external companies to report on OH&S issues. |
| 11.4 OH&S performance   | Conformance | The Entity has established a roadmap on the safety of people and processes. A Steering Group, including a member of the Safety, Health and Working Conditions Commission and management meets fortnightly. Key Performance Indicators (KPI's) are a mix of lagging and leading indicators.  |

**Document Control and Version History**

| Revision | Date         | Notes  |
|----------|--------------|--|
| 0        | 1 April 2022 | Initial Certification Audit - Full Certification |