

ASI CERTIFICATION
CHAIN OF CUSTODY
STANDARD



PRESENTED TO

**CONSTELLIUM
NEUF-BRISACH**

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITOR
106	CHAIN OF CUSTODY (V1 2017)	FULL CERTIFICATION	GUTCERT (AFNOR GROUP)
DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE	
2 DECEMBER 2020	1 DECEMBER 2023	2 DECEMBER 2020	

AUTHORISED BY

A handwritten signature in white ink on a dark grey 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

CERTIFICATION SCOPE

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

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

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/RefiningCasthousesPost-Casthouse
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (14 – 16 October 2020)Surveillance Audit (14 – 15 June 2022)
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">14 - 16 October 2020 (Initial Certification Audit)14 – 15 June 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">11 November 2020 (Initial Certification Audit)21 June 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (14 – 16 October 2020)</u></p> <p>The audit scope included casting, rolling, finishing and recycling facilities at Neuf-Brisach facility.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse <p>Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.</p>

Surveillance Audit (14 – 15 June 2022)

The audit scope included casting, rolling, finishing and recycling facilities at Neuf-Brisach facility.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Post-Casthouse

Relevant Criteria from the ASI Chain of Custody Standard were included in the Audit Scope.

AUDIT
OUTCOME

- 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

2 December 2020 – 1 December 2023

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

1 December 2023

CERTIFICATE
NUMBER

106

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	<p>Constellium has been an ASI Member since January 2015 under the Production and Transformation membership class: https://aluminium-stewardship.org/about-asi/asi-member-listing.</p> <p>Constellium has operational control over the Entity of Neuf-Brisach included in the scope of the ASI Chain of Custody Standard.</p>
1.2 Management system	Conformance	The Entity has implemented a Management System that addresses all applicable requirements of the ASI Chain of Custody Standard. The objectives, scope, and responsibilities are well defined, and resources are provided to ensure its implementation.
1.3 Management system reviews	Conformance	The Entity ensures periodic reviews and updates (mainly during the quarterly quality meetings) of the Chain of Custody Management System and integrated within the global Management System reviews of the Entity.
1.4 Management representative	Conformance	The Entity has nominated a Management Representative (Head of Metal Manager) having overall responsibility and authority for the Entity's conformance with all applicable requirements of the ASI Chain of Custody Standard.
1.5 Training	Conformance	The Entity has established and implemented communications and training measures that make relevant personnel aware of and competent in their responsibilities under the ASI Chain of Custody (CoC) Standard. Adequate training was provided to the CoC operational team.
1.6 Record keeping	Conformance	The Entity has implemented a procedure to maintain up-to-date records covering all applicable requirements of the ASI Chain of Custody Standard. According to this procedure, records are kept for a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity has implemented a procedure to periodically report information to the ASI Secretariat within three months after the end of each calendar year. The Input and Output Quantities of CoC Materials over the calendar year are reported.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity has implemented a procedure to periodically report information to the ASI Secretariat within 3 months after the end of each calendar year. The Input Percentage calculated over the calendar year is reported.

CRITERION	RATING	COMMENT
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity has implemented a procedure to periodically report information to the ASI Secretariat within three months after the end of each calendar year. The maximum Positive Balance in the calendar year is reported.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity has implemented a procedure to periodically report information to the ASI Secretariat within three months after the end of each calendar year. The maximum Internal Overdraw within the calendar year and the percentage of Input Quantity of CoC Material are reported.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	The Entity has implemented a procedure to periodically report information to the ASI Secretariat within three months after the end of each calendar year. The total Input Quantity of Eligible Scrap with a breakdown by Post-Consumer/Pre-Consumer Scrap in the calendar year is reported.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Conformance	The Entity has implemented a procedure to periodically report information to the ASI Secretariat within three months after the end of each calendar year. The quantity of ASI Aluminium allocated to ASI Credits in the calendar year is reported.
1.7g Reporting to ASI (ASI Credits purchased)	Conformance	The Entity has implemented a procedure to periodically report information to the ASI Secretariat within three months after the end of each calendar year. The quantity of ASI Credits purchased in the calendar year is reported.
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.2a Control of CoC Material	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.2b No further outsourcing	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.2c Risk assessment	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.3 Output Quantity	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.

CRITERION	RATING	COMMENT
2.4 Verification and record-keeping	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's Certification Scope.
2.5 Error management	Not Applicable	This Criterion is not applicable as the Entity does not have Outsourcing Contractors included within the Entity's 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	Conformance	ASI Liquid Metal is produced only from the recycling facility of the Entity, which is within the ASI Chain of Custody Standard Certification Scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	ASI Liquid Metal is produced only from the recycling facility of the Entity, which is within the Entity's ASI Performance Standard Certification Scope.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Entity has implemented a process to account for Eligible Scrap as Pre-Consumer Scrap designated as CoC Material and Aluminium recovered from Dross that is subject to supplier Due Diligence.
4.2b Post-Consumer Scrap	Conformance	The Entity has implemented a process to account for Eligible Scrap as Post-Consumer Scrap that is subject to supplier Due Diligence.
4.3a Supplier records	Conformance	The Entity has implemented a system to record the identity, principals, and places of operation of all direct suppliers of Recyclable Scrap Material through its SAP

CRITERION	RATING	COMMENT
		software. This process was reviewed and correctly applied.
4.3b Cash payments	Conformance	Cash transactions with direct suppliers of Recyclable Scrap Material are not allowed nor undertaken.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope – Casthouses	Conformance	The Entity ensures that it produces ASI Aluminium only from Casthouses within the CoC Certification Scope of ASI Chain of Custody Certified Entities. Only Aluminium slabs sourced externally from other ASI CoC Certified Entities are considered as ASI Aluminium.
5.1b ASI Performance Standard – Casthouses	Conformance	The Entity ensures that it produces ASI Aluminium only from Casthouses that are certified against the ASI Performance Standard. Only Aluminium slabs sourced externally from other ASI Performance Standard Certified Entities are considered as ASI Aluminium.
5.2 Casthouse Products	Conformance	The Entity has a system to ensure full traceability via product identification on all shipments and deliveries from the Casthouses. The unique identification system, supported by the Enterprise Resource Planning (ERP) and production systems, can be linked to the Input Quantity of CoC Material for the Material Accounting Period.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	The Entity's rolling and finishing plants are within the Entity's CoC Certification Scope. Aluminium sourced from other non-CoC Certified Entities is not considered CoC Material.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	The Entity's rolling and finishing plants are within the Entity's Performance Standard Certification Scope.
6.1c Sourcing ASI Aluminium	Conformance	The Entity sources Aluminium coils from other CoC Certified Entities, however, this Material is not considered ASI Aluminium as associated CoC Documents are not provided.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Entity has communicated its supplier Code of Conduct to suppliers of Non-CoC Material and Recyclable Scrap Material https://www.constellium.com/sustainability/downloads/policies-codes-conduct The Code includes relevant standards on Anti-Corruption.

CRITERION	RATING	COMMENT
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Entity has communicated its supplier Code of Conduct to suppliers of Non-CoC Material and Recyclable Scrap Material: https://www.constellium.com/sustainability/downloads/policies-codes-conduct The Code includes relevant standards on Responsible Sourcing.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Entity has communicated its supplier Code of Conduct to suppliers of Non-CoC Material and Recyclable Scrap Material: https://www.constellium.com/sustainability/downloads/policies-codes-conduct The Code includes relevant standards on Human Rights Due Diligence.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Entity has communicated its supplier Code of Conduct to suppliers of Non-CoC Material and Recyclable Scrap Material: https://www.constellium.com/sustainability/downloads/policies-codes-conduct The Code includes relevant standards on Conflict-Affected and High-Risk Areas.
7.2 Risk assessment	Conformance	The Entity has implemented procedures to assess the risks of non-compliance with its Responsible Sourcing Policy by its suppliers of Non-CoC Material and Recyclable Scrap Material. A specific risk assessment matrix has been developed for recyclable scrap suppliers. Due Diligence checks are performed mainly using the ECOVADIS platform. Results from the risk assessments and Due Diligence process are documented and appropriate actions are undertaken if necessary.
7.3 Complaints mechanism	Conformance	The Entity has established an appropriate complaints mechanism through various procedures and tools (e.g., Constellium ASI and Sustainability mailboxes). There have been no recent complaints expressed by interested parties.
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has defined and implemented a Material Accounting System recording Input and Output Quantity of CoC and Non-CoC Material by mass. Instructions are defined to collect the input data. Input and Output Quantities of CoC and Non-CoC Material are recorded in tons in the Mass Balance System. Weighing scales used for the Mass Balance System are calibrated.

CRITERION	RATING	COMMENT
8.2a Post-Consumer Scrap	Conformance	The breakdown of Recyclable Scrap (including Input Quantity of Post-Consumer Scrap) is recorded in the Entity's Material Accounting System.
8.2b Pre-Consumer Scrap (total)	Conformance	The breakdown of Recyclable Scrap (including Input Quantity of total Pre-Consumer Scrap) is integrated within the Material Accounting System.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The breakdown of Recyclable Scrap (including Input Quantity of Pre-Consumer Scrap that is Eligible Scrap) is recorded and integrated within the Entity's Material Accounting System.
8.3 Material Accounting Period	Conformance	The Entity has defined a Material Accounting Period of 12 months (from 01/01 to 31/12).
8.4 Input Percentage	Conformance	The Entity calculates and records the Input Percentage using the appropriate formula. Units in the numerator and the denominator are the same.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The Entity calculates and records the Input Percentage using the appropriate formula. Units in the numerator and the denominator are the same. Input Quantities of Eligible Scrap and Recyclable Scrap are based on an assessment of Aluminium content.
8.6 Output Quantity determination	Conformance	The Entity uses the Input Percentage for the Material Accounting Period to determine the Output Quantity of CoC Material by mass.
8.7 Output Quantity designation	Conformance	The Entity has defined in the CoC procedure that the Output Quantity of CoC Material is designated as 100% CoC Material.
8.8 Output Quantity – Pre-Consumer Scrap	Conformance	The Entity has defined and implemented that for Pre-Consumer Scrap produced by the Entity, the Input Percentage of the Material Accounting Period is used to determine the Output Quantity of Eligible Scrap.
8.9 Outputs not exceed inputs	Conformance	The Entity has implemented a procedure to verify that the total output of CoC Material and Eligible Scrap does not proportionally exceed the Input Percentage as applied to the 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 ensures a maximum of 20% Internal Overdraw of total Input Quantity of CoC Material occurs within the Material Accounting Period.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	The Entity's Material Accounting System is designed to ensure that the Internal Overdraw will not exceed the

CRITERION	RATING	COMMENT
		amount of CoC Material affected by a force majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	The Entity's Material Accounting System ensures that the Internal Overdraw will be made up within the subsequent Material Accounting Period.
8.11a Positive Balance (carry over)	Conformance	The Entity identifies any carry over of a Positive Balance in its Material Accounting System.
8.11b Positive Balance (expiry)	Conformance	The Entity's Material Accounting System is designed to ensure that any Positive Balance of output CoC Material at the end of the Material Accounting Period will be carried over to the subsequent period and any carry over will expire at the end of that period if not drawn down.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	The Entity has issued a monthly CoC Document to each customer to account for all batches shipped. There is a link between the monthly CoC Document and individual shipments.
9.2a Date of issue	Conformance	The Entity has included CoC information (including the date of issue of the CoC Document) in its CoC Documents.
9.2b Reference number	Conformance	The Entity has included CoC information (including a reference number for the CoC Document linked to the Material Accounting System) in its CoC Documents.
9.2c Issuing Entity	Conformance	The Entity has included CoC information (including the identity, address and CoC Certification number of the Entity issuing the CoC Document) in its CoC Documents.
9.2d Receiving customer	Conformance	The Entity has included CoC information (including the identity and address of the customer receiving the CoC Material, and their CoC Certification number) in its CoC Documents.
9.2e Responsible employee	Conformance	The Entity has included CoC information (including the details of the responsible employee of the Entity who can verify the information in the CoC Document) in its CoC Documents.
9.2f Conformance statement	Conformance	The Entity has included CoC information (including the following statement, "The information provided in the CoC Document is in conformance with the ASI CoC Standard") in its CoC Documents.
9.2g Type of CoC Material	Conformance	The Entity has included CoC information (including the type of CoC Material in shipments) in its CoC Documents.

CRITERION	RATING	COMMENT
9.2h Mass of CoC Material	Conformance	The Entity has included CoC information (including the mass of CoC Material in the shipment) in its CoC Documents.
9.2i Mass of total material	Conformance	The Entity has included CoC information (including the mass of total Material in the shipment) in its CoC Documents.
9.3a Sustainability Data (optional)	Not Applicable	This Criterion is not applicable as the Entity does not intend to include Sustainability Data regarding GHG Emissions in the CoC Document.
9.3b Sustainability Data (passing on)	Not Applicable	This Criterion is not applicable as the Entity does not intend to include Sustainability Data regarding GHG Emissions in its CoC Documents.
9.3c Post-Casthouse ASI Certification status	Conformance	The Entity has included information on its ASI Performance Standard Certification, including its Certification Number and date of validity, in its CoC Documents.
9.4 Supplementary Information (optional)	Conformance	The Entity has defined that any Supplementary Information included in the CoC Document is to be supported by Objective Evidence.
9.5 Response to verification requests	Conformance	The Entity has defined and implemented systems (e.g., a generic mailbox) to respond to requests for verification of information in CoC Documents issued by the Entity.
9.6 Error management	Conformance	The Entity has a procedure that defines how errors regarding CoC Material shipments must be handled (e.g., documentation of the error, root cause analysis, communication, and improvement actions to avoid recurrence).
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The Entity has a procedure to verify information in the received CoC Documents.
10.2 Verify consistency with shipments	Conformance	The Entity has a procedure to verify the received CoC Documents. The verification takes place before recording information in the Material Accounting System.
10.3 Verify supplier CoC Certification status	Conformance	The Entity has defined and implemented regular checks of the validity and scope of the supplier's ASI CoC Certification.
10.4 Error management	Conformance	The Entity has defined in its procedure how errors are handled regarding CoC Documents, such as documenting the error, performing a root cause analysis,

CRITERION	RATING	COMMENT
		communication of the error, and improvement actions to avoid recurrence.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1b Link to Casthouse Products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1c No double counting	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.1d No Positive Balance for ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2a Date of issue	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2b Reference number	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2c Issuing Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2d Receiving Entity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2e Conformance statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2f ASI Credits statement	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.2g Quantity	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3b Material Accounting System – purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3c Expiry	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3d No re-trading	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3e No allocation to physical products	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.

CRITERION	RATING	COMMENT
11.3f Verify supplier CoC Certification status	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	This Criterion is not applicable as the Entity does not use the Market Credit System.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity has implemented a procedure for making claims related to CoC Material consistent with the ASI Claims Guide. Communications are made in a manner consistent with the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	The Entity has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. The Entity's communications are supported by verifiable evidence.
12.1c Employee training	Conformance	The Entity has trained relevant employees regarding ASI claims and/or representations.

Document Control and Version History

Revision	Date	Notes
0	2 December 2020	Initial Certification Audit – Full Certification
1	8 July 2022	Surveillance Audit