

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CONSTELLIUM EXTRUSIONS DĚČÍN S.R.O.

CERTIFICATE
NUMBER

284

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

16 MAY 2023

DATE OF EXPIRY

15 MAY 2024

CERTIFIED SINCE

16 MAY 2023

AUTHORISED BY

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

CERTIFICATION SCOPE

Manufacturing of semifinished aluminium and aluminium alloy products produced by casting and subsequent hot extrusion and cold forming including partial machining at Děčín extrusion plant (Czech Republic).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium Extrusions Děčín s.r.o.
CERTIFICATION SCOPE	Manufacturing of semifinished aluminium and aluminium alloy products produced by casting and subsequent hot extrusion and cold forming including partial machining at Děčín extrusion plant (Czech Republic).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit
AUDIT FIRM	GUTcert (AFNOR GROUP)
AUDIT DATE	<ul style="list-style-type: none">• 28 February – 2 March 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 22 April 2022
AUDIT SCOPE	<p>The audit scope includes the Constellium Extrusions Děčín plant including production of aluminum billets and semi-fabricated products (bars, tubes, sections).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Casthouses• 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

16 May 2023 – 15 May 2024

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

15 November 2023

CERTIFICATE
NUMBER

284

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity holds ISO 14001, ISO 45001 and ISO 50001 certifications from an accredited certification body and undertakes regular workplace assessments by an independent verifier, refer: https://www.constellium.com/locations/decin/#tab=download</p> <p>Corporate Headquarters supports the site with legal counsel.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has a documented system in place against Corruption. Among the instruments, a Code of Conduct has been 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.</p> <p>The corporation reports periodically on anti-corruption in its annual Sustainability Report, available at: https://www.constellium.com/sustainability/policies-reports-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. The Constellium Group Code of Conduct is available at: https://www.constellium.com/sustainability/policies-reports-and-certifications and https://www.constellium.com/locations/decin/#tab=download</p>
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 to periodic employee training. The site holds certificates according to ISO 14001, ISO 50001 and ISO 45001 from an accredited certification body which is current for the Entity's Certification Scope. Further information is available via: https://www.constellium.com/sustainability/policies-reports-and-certifications and</p>

CRITERION	RATING	COMMENT
		https://www.constellium.com/locations/decin/#tab=download
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Policies are endorsed by senior management, and periodically reviewed as required in the Environmental, Energy and Health and Safety Management Systems. Responsibilities are defined. Resources are provided and the Entity receives support from Corporate Headquarters (global sustainability team).</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has communicated the Policies internally and externally as appropriate via the corporate and local websites:</p> <p>https://www.constellium.com/sustainability/policies-reports-and-certifications</p> <p>https://www.constellium.com/locations/decin/#tab=download</p> <p>The Supplier Code of Conduct is actively communicated to suppliers.</p>
2.2 Leadership	Conformance	<p>The Entity's Plant Manager has the overall responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources to support the implementation of the standard. This role is supported by a local team as well as the corporate sustainability team.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has documented and implemented an Environmental Management System according to ISO 14001 and an Energy Management System according to ISO 50001. These systems are certified by an accredited certification body.</p> <p>The effectiveness of implementation has been confirmed by recent audit reports related to the above mentioned standards.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has documented and implemented an Occupational Health and Safety Management System according to ISO 45001. The facets of Human and Labour Rights are also managed in a Social Management System, but the practice is not yet formalised to the same extent as the EHS (Environment, Health and Safety) system. Nonetheless, the Entity has achieved an Ecovadis 'platinum' sustainability rating and successfully passed an external workplace conditions assessment. For further information see:</p> <p>https://www.constellium.com/locations/decin/#tab=download</p>

CRITERION	RATING	COMMENT
2.4 Responsible Sourcing	Minor Non-Conformance	<p>Constellium Group has issued and communicated its Supplier Code of Conduct: https://www.constellium.com/sustainability/policies-reports-and-certifications</p> <p>As part of the implementation of the corporate Responsible Supply Chain Management Policy, the Entity systematically audits relevant suppliers. However, environmental, social and governance aspects have not yet been adequately included in these supplier audits.</p>
2.5 Impact Assessments	Minor Non-Conformance	<p>Approval is required from Corporate Headquarters for New Projects and Major Changes to existing Facilities, which has systems in place to assess the risks related to these projects. The Entity has demonstrated environmental Impact Assessments for recent projects.</p> <p>However, a social, cultural and Human Rights Impact Assessment for these projects was not provided.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has a site-specific emergency response plan developed in collaboration with the community and relevant authorities. Emergency situations are periodically trained.</p> <p>The Entity also holds ISO 14001 and ISO 45001 certifications which are current to the Entity's Certification Scope.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity systematically reviews environmental, social and governance issues as part of the planning and Due Diligence processes. Mergers and acquisitions are not managed at the local level, rather by the Entity's Corporate Headquarters. The Entity's ESG Due Diligence Policy is publicly available: https://res.cloudinary.com/constellium/image/upload/v1663769844/PDF%20documents/Governance/esg_diligences_policy_dsnczd.pdf</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity systematically reviews environmental, social and governance issues as part of the planning and Due Diligence processes. Closure, decommissioning and divestments are not managed at the local level, rather by the Entity's Corporate Headquarters. The Entity's ESG Due Diligence Policy is publicly available: https://res.cloudinary.com/constellium/image/upload/v1663769844/PDF%20documents/Governance/esg_diligences_policy_dsnczd.pdf</p>

CRITERION	RATING	COMMENT
3.1 Sustainability Reporting	Conformance	The Constellium Group has publicly disclosed its governance approach (page 14) and its material environmental, social and economic impacts in its annual Sustainability Report, which is based on GRI (Global Reporting Initiative) and UN Global Compact principles: https://www.constellium.com/sustainability/policies-reports-and-certifications
3.2 Non-compliance and liabilities	Conformance	Non-compliance and liabilities are disclosed in the Constellium annual Sustainability Report: https://www.constellium.com/sustainability/policies-reports-and-certifications The GRI indicator on non-compliance with laws and regulations in the social and economic area (419-1), reported in the 2021 Business and Sustainability Report (page 89) and 2022 Sustainability Report (page 68), indicates there were no significant non-compliance or liabilities recorded.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to Anti-Corruption requirements related to payments to governments and the facilitation of payments (among the instruments, there are policies, training, guidelines, risk assessments and audits).
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 to address Stakeholder complaints, grievances and requests for information relating to its operations. An 'Integrity Hotline' has been established and is available 24/7 via a toll-free telephone number with trained specialists able to respond across various languages: https://www.constellium.com/integrity-hotline A secure e-mail option is also available: https://secure.ethicspoint.com/domain/media/en/gui/58698/index.html However, the publicly available description of the mechanism is not transparent enough since relevant information is not readily available when accessing the hotline (e.g., response time and responsibility for the mechanism).
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the environmental life cycle impacts of the main products in a Life Cycle

CRITERION	RATING	COMMENT
		Assessment (LCA) with help from external experts. The study covers cradle-to-gate.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has a process in place to respond to any customer requests and information on Constellium's LCA is available from the Entity upon request. Management confirmed that until the time of the audit, there were no requests for a full cradle-to-gate LCA from customers.
4.1c Environmental Life Cycle Assessment (public communication)	Not Applicable	This Criterion is not applicable, as the Entity does not currently communicate on LCA and does not make its LCA(s) publicly available. However, on a corporate level, information on Constellium's approach to LCAs is available in the group's Sustainability Report, page 31: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf
4.2 Product design	Not Applicable	This Criterion is not applicable, as all product specifications are provided by the Entity's customers. In this regard, the Entity has none of its own design activities.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has implemented a process to minimise and monitor the generation of Aluminium Process Scrap. There are measures in place to decrease the generation of production scrap. Targets are established and monitoring of scrap is implemented. Scrap quantities are regularly reviewed. All aluminium scrap is externally recycled.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	As confirmed during the site tour, the Entity has developed and applies a strict separation of Aluminium Process Scrap per aluminium alloy group.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity is currently building its own recycling centre, which will support the efforts to foster recycling of its Products. A detailed plan for construction was on hand. The Entity does not supply directly to consumers, rather it has a B2B (Business-to-Business) market.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity only supplies other businesses and does not sell to consumers. It has extended its Casthouse with a dedicated re-melt furnace to recycle not only internal scrap but to also allow processing of customer scrap and scrap with organics.

CRITERION	RATING	COMMENT
		The promotion of recycling is undertaken by Corporate Headquarters supporting the activities of a relevant industry association.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	At Group level, Constellium has publicly disclosed its Greenhouse Gas (GHG) emissions and energy use by type annually in the Sustainability Report. The latest available report at the time of the audit was for 2021, refer to the 2021 Business and Sustainability Report, pages 62 and 80: https://www.constellium.com/sustainability/policies-reports-and-certifications
5.2 GHG emissions reductions	Conformance	The Entity has publicly disclosed its GHG emissions reduction targets in its annual sustainability performance reports. The latest available report at the time of the audit covers 2021, refer to the 2021 Business and Sustainability Report, page 64: https://www.constellium.com/sustainability/policies-reports-and-certifications
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 Air are under tight control according to local regulations and permits. The Entity has developed and implemented policies, systems, procedures, and processes that conform to the ASI Performance Standard requirements. The Entity has a valid ISO 14001 certificate.
6.2 Discharges to Water	Conformance	The Entity monitors and, at the corporate level, publishes its key Discharges to Water in the annual Sustainability Report, see page 56, GRI 303-1 and 306-1: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has implemented a process to identify potential emergency situations caused by Spills and Leakages and prepared emergency plans accordingly. There is also a specific emergency plan for water pollution in place in accordance with national legislation. The presence of emergency equipment has been confirmed during the site visits.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed and implemented procedures and processes that conform to the ASI Performance Standard requirements for the assessment and management of Spills and Leakages. This includes emergency, monitoring and communication procedures.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Any Spill is handled internally by the plant team and recorded in a database. As part of legal requirements, the Entity has implemented a procedure and system to communicate spills to the authorities and other Stakeholders in due time.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity monitors and, at the corporate level, publishes information about Material Spills and Leakages in its annual Sustainability Report, page 36: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf In that document, a track record of zero significant environmental incidents over more than seven years was reported.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy. The clear focus is on the avoidance of waste. The Entity has a policy for minimisation of waste generation in production and aims to increase the sorting of waste for recycling. Performance indicators are defined and monitored.
6.5b Waste management and reporting (disclosure)	Conformance	Constellium Group has made the quantity of Hazardous and Non-Hazardous Waste generated by the group, and the associated waste disposal methods publicly available in its annual Sustainability Report, pages 37 and 55: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf

CRITERION	RATING	COMMENT
		0Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf
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	The site tour, interviews and document review confirmed that about 100% of the Dross is gathered and recycled externally.
6.8b Dross (recycling)	Conformance	As confirmed by document review and interviews, about 100% of the Dross is shipped to an external recycler. Dross is not landfilled.
6.8c Dross (review of alternatives)	Conformance	As confirmed by document review and interviews, about 100% of the Dross is shipped to an external recycler. Dross is not landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Interviews and document review confirmed that the Entity has identified and monitored its water withdrawal and use by source and type.

CRITERION	RATING	COMMENT
7.1b Water assessment (risk assessment)	Conformance	The Entity's risk assessment did not identify Material water-related risks in Watersheds in their Area of Influence, as confirmed by interviews, document review and site tour.
7.2a Water management (management plans)	Not Applicable	This Criterion is not applicable, as the Entity's risk assessment did not identify any Material water-related risks. Confirmed by interviews, document review and site tour.
7.2b Water management (monitoring)	Not Applicable	This Criterion is not applicable, as the Entity's risk assessment did not identify any Material water-related risks. Confirmed by interviews, document review and site tour.
7.3 Disclosure of water usage and risks	Conformance	The Entity's Corporate Headquarters discloses group-level water withdrawals and use in its annual Sustainability Report. Refer to the 2022 report, pages 37, 56 and 65: https://www.constellium.com/sustainability/policies-reports-and-certifications

PRINCIPLE 8 BIODIVERSITY

8.1 Biodiversity assessment	Major Non-Conformance	Although environmental assessments are part of the legally mandated permitting process and are in place, the Entity does not have a biodiversity assessment available.
8.2a Biodiversity management (biodiversity action plans)	Minor Non-Conformance	Although environmental assessments are part of the legally mandated permitting process and are in place, the Entity does not have a biodiversity assessment available. Consequently, a Biodiversity Action Plan has not been issued.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Minor Non-Conformance	The Entity does not have a biodiversity assessment available and consequently, a Biodiversity Action Plan has not been issued.
8.2c Biodiversity management (reporting)	Minor Non-Conformance	The Entity does not have a biodiversity assessment available and consequently, a Biodiversity Action Plan has not been issued and therefore, the biodiversity outcomes have not been shared with Stakeholders and made publicly available.
8.3 Alien Species	Minor Non-Conformance	On customer request, for non-European export, the Entity takes preventive actions to avoid the introduction of Alien Species that could have significant adverse impacts on biodiversity (fumigation or chemical treatment of wooden packaging according to international phytosanitary code ISPM 15).

CRITERION	RATING	COMMENT
		However, currently, the Entity has not yet made a risk analysis to assess the risk of potential impacts from alien and invasive species.
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 Group 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 ‘Human Rights Policy and Labor Practices’ as well as the Code of Conduct are available at: https://www.constellium.com/sustainability/policies-reports-and-certifications Employees receive related training regularly, as confirmed during document review and interviews.
9.1b Human Rights Due Diligence (process)	Conformance	Constellium Group has conducted a documented Human Rights Due Diligence process with internal Stakeholders. The Entity is embedded in the community and the assessment confirmed that there are currently no salient adverse issues regarding Human Rights. Identified risks are mainly in the supply chain and the Group is addressing them.
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 Entity. The Entity did not identify as having caused or contributed to adverse Human Rights impacts.
9.2 Women’s Rights	Minor Non-Conformance	During the site tour, interviews and document review, no indication of intentional Discrimination against women was observed. Constellium Group reports publicly on gender diversity indicators such as the number of female/male Workers and male/female

CRITERION	RATING	COMMENT
		<p>senior managers, refer to the Sustainability Report 2022, pages 25, 45, 46 and 60: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf</p> <p>Equal pay is implemented. However, a proactive, systematic and comprehensive approach to ensure respect for the needs and interests of women is not yet visible on site level.</p>
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, 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 is not applicable, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations. There are no Indigenous Peoples present in the area. The industrial site has been active for more than 100 years.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable, 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.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable, as confirmed by interviews, the Entity did not require people to resettle or to be displaced. The Entity's senior management confirmed that this is also not planned for New Projects or Major Changes.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable, as confirmed by interviews, the Entity did not require people to resettle or to be displaced. The Entity's senior management confirmed that this is also not planned for New Projects or Major Changes.
9.7a Local Communities (rights and interests)	Conformance	Interviews with management, Workers and external Stakeholders confirmed that the Entity respects the rights and interests of the Local Community. The Human Rights Due Diligence assessment did not identify any salient negative impact of the Entity with regard to the Local Community.
9.7b Local Communities (impacts)	Conformance	The Entity's Human Rights Due Diligence did not identify the presence of issues negatively affecting

CRITERION	RATING	COMMENT
		<p>the Local Community.</p> <p>However, Constellium Group does foster the site's engagement with Local Communities. For further information refer to the 2021 Business and Sustainability Report, pages 57-58 and the 2022 Sustainability Report, page 47: https://www.constellium.com/sustainability/policies-reports-and-certifications</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity's Human Rights Due Diligence did not identify the presence of issues negatively affecting the Local Community.</p> <p>However, Constellium Group does foster the site's engagement with Local Communities. For further information refer to the 2021 Business and Sustainability Report, pages 57-58 and the 2022 Sustainability Report, page 47: https://www.constellium.com/sustainability/policies-reports-and-certifications</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>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. Constellium publicly discloses the Group's exposure to conflict-affected sourcing through the Responsible Minerals Initiative - Conflict Minerals Reporting Template (RMI-CMRT). This document, Constellium's response to the Securities and Exchange Commission (SEC) regarding the Dodd-Frank Act, their Supplier Code of Conduct and their Responsible Supply Chain Management Policy are available on Constellium's website: https://www.constellium.com/sustainability/policies-reports-and-certifications</p>
9.9 Security practice	Conformance	<p>The Entity does not employ armed security forces. During the Entity's Human Rights risk 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.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>As confirmed by interviews with Workers and their representatives, the Entity respects the rights of Workers to unite freely in the union, seek representation and join the union without interference. A freely elected union committee is established.</p>

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity does respect the right to Collective Bargaining and adheres to the site-specific Collective Bargaining Agreement (CBA). Freedom of Association is stated in the Human Rights Policy but not explicitly the right to Collective Bargaining (as the policy has global coverage, and in China, the right to 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 is not applicable, as the right to Freedom of Association and Collective Bargaining is not restricted in the Czech Republic.
10.2a Child Labour (minimum age)	Conformance	The Entity does neither use nor support the use of Child Labour. The minimum working age of 15 years is respected. The youngest worker (summer students for office work only) was 16 years. There are robust practices implemented to ensure that children are not employed.
10.2b Child Labour (hazardous)	Conformance	The Entity does neither use nor support the use of Child Labour. The minimum working age of 15 years is respected. The youngest worker (summer students for office work only) was 16 years. There are robust practices implemented to ensure that children are not employed.
10.2c Child Labour (worst forms)	Conformance	The Entity does neither use nor support the use of Child Labour. The minimum working age of 15 years is respected. The youngest worker (summer students for office work only) was 16 years. There are robust practices implemented to ensure that children are not employed.
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, nor support, Human Trafficking either directly or through any employment or 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

CRITERION	RATING	COMMENT
		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.
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 (typically 2 months), as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	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 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, as confirmed by interviews and document review. There is annual online training for all employees, and according to job grade, some employees receive additional training.
10.5 Communication and engagement	Conformance	The Entity have various communication channels in place, including regular meetings, information boards, and intranet, to 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.

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10.6 Disciplinary practices	Conformance	The Entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion and gender-based violence, in accordance with the Constellium 'Human Rights Policy and Labor Practices' document and 'Code of Employee and Business Conduct', both accessible via: https://www.constellium.com/sustainability/policies-reports-and-certifications
10.7a Remuneration (living wage)	Conformance	The Entity respects 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 complies 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. A clock-in system is in place and records are on hand.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented its Occupational Health and Safety (OH&S) Management System which is certified to ISO 45001 by an accredited certification body. Constellium's corporate and the Entity's local OH&S Policies are publicly available: https://res.cloudinary.com/constellium/image/upload/v1665599074/PDF%20documents/Policies%20and%20Certifications/Policies/EHS%20Policy/ehspolicy2016-eng_1_bmfjjo.pdf https://assets.ctfassets.net/e62qtriulv4v/5RhQAWAL_CSeXTDyQsnBza/cff6acc99a9ce8961fafec842dca487c/Politika_2_Integrovan_ho_Syst_mu_zen_.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has implemented its OH&S Policy, which is applied to Workers, Contractors and Visitors.

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>Constellium's Code of Conduct and Human Rights Policy and Labor Practices document are issued and communicated internally and externally.</p> <p>The Human Rights Policy and Labor Practices contains a commitment to comply with Applicable Law on Workers' health and safety: https://www.constellium.com/sustainability/policies-reports-and-certifications</p> <p>The Constellium Code of Employee and Business Conduct (page 10) states that "Constellium will not tolerate any violation of the International Labour Organization (ILO) Principles."</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>Interviewed Workers all confirmed that they have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. The right is confirmed in the Constellium 'caring for each other' program, which has been deployed for some years with associated training sessions for employees.</p> <p>Management clearly commits to a "safety first" approach and has communicated this to the workforce.</p>
11.2 OH&S Management System	Minor Non-Conformance	<p>The Entity holds an ISO 45001 certificate from an accredited certification body, which is valid and covers the Entity's Certification Scope, refer: https://www.constellium.com/sustainability/policies-reports-and-certifications</p> <p>The latest audit report did not identify any non-conformity.</p> <p>However, the OH&S Management System is not fully effective, as its not ensured that permanent Contractor Workers are included in evacuation drills.</p>
11.3 Employee engagement on health and safety	Conformance	<p>The Entity has established a joint health and safety committee, where Workers and management raise, discuss and resolve work related health and safety issues. Evidence for regular meetings of the Health and Safety Committee was on hand. The Committee usually meets quarterly.</p>
11.4 OH&S performance	Conformance	<p>The Entity has defined annual objectives and targets including specific key performance indicators to evaluate its occupational health and safety performance. Leading and lagging indicators are defined and regularly monitored.</p>

Document Control and Version History

Revision	Date	Notes
0	16 May 2023	Initial Certification Audit – Provisional Certification