

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Aluminium Dunkerque

CERTIFICATE NUMBER

88

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

DATE OF ISSUE

30 JUNE 2023

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

DATE OF EXPIRY

29 JUNE 2026

ASI ACCREDITED  
AUDITING FIRM

GUTCERT (AFNOR  
GROUP)

CERTIFIED SINCE

3 AUGUST 2020

AUTHORISED BY

A stylized, handwritten signature in black ink, appearing to be 'J. H.' followed by a long horizontal stroke.

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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)**

CERTIFICATION SCOPE

The production and sale of  
aluminium by electrolysis of  
alumina in the form of rolling slabs  
and ingots for remelting at  
Aluminium Dunkerque (France) site.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Aluminium Dunkerque SAS
ENTITY NAME	Aluminium Dunkerque
CERTIFICATION SCOPE	The production and sale of aluminium by electrolysis of alumina in the form of rolling slabs and ingots for remelting at Aluminium Dunkerque (France) site.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (23 – 25 June 2020)</li><li>Surveillance Audit (4 – 6 October 2021)</li><li>Re-Certification Audit and Scope Change (29 May – 2 June 2023)</li></ul>
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none"><li>23 – 25 June 2020 (Initial Certification Audit)</li><li>4 – 6 October 2021 (Surveillance Audit)</li><li>29 May – 2 June 2023 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>9 July 2020 (Initial Certification Audit)</li><li>26 October 2021 (Surveillance Audit)</li><li>16 June 2023 (Re-Certification Audit and Scope Change)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (23 – 25 June 2020)</u></p> <p>The audit scope covered the Alvançe Aluminium Dunkerque facility including the smelter and the casthouse based in Dunkerque, France. The production and sale of aluminium by electrolysis of alumina in the form of rolling slabs and ingots for remelting at the Dunkerque site.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Surveillance Audit (4 – 6 October 2021)</u></p> <p>The audit scope covered the Aluminium Dunkerque facility including the smelter and the casthouse based in Dunkerque, France. The production and sale of aluminium by electrolysis of alumina in the form of rolling slabs and ingots for remelting at the Dunkerque site.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Aluminium Smelting</li></ul>

- Casthouses

All relevant Criteria in the ASI Performance Standard were included in the audit scope.

Re-Certification Audit and Scope Change (29 May – 2 June 2023)

The audit scope covered the Aluminium Dunkerque facility including the smelter and the casthouse based in Dunkerque, France. The production and sale of aluminium by electrolysis of alumina in the form of rolling slabs and ingots for remelting at the Dunkerque site.

The supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouses

All relevant Criteria in the ASI Performance 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

30 June 2023 – 29 June 2026

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

29 December 2024

CERTIFICATE NUMBER

88



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

## ENTITY OVERVIEW

Located in North of France near Dunkirk, the Aluminium Dunkerque plant was founded in 1991. It was purchased by AIP (American Industrial Partners) on 1 October 2021 and is the largest primary aluminium foundry in Europe, with a capacity of approximately 290,000 tonnes per annum from 264 retention cells.

The facility has approximately 730 employees on site with a further 200 contractors engaged on a full-time basis.

The area under management is approximately 65 hectares (ha). The nearest towns are Gravelines and Loon Plage, both located approximately 4 kilometres from the Entity. Nearby sensitive receptors include the Natura 2000 reserve "Bancs de Flandres" and the natural reserve of "Platier d'Oye" located within five kilometres from the Entity.

Key external stakeholders include the local towns (i.e. Gravelines and Loon Plage), the local authorities, Dunkirk Harbour, and the Site Surveillance Committee (CSS).

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	Medium	High	Medium	Medium
<b>RISKS</b>	Medium	Medium	Medium	Medium
<b>PERFORMANCE</b>	Medium	Medium	Medium	Medium
<b>OVERALL</b>	<b>MEDIUM</b>			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has implemented procedures for a legal watch to ensure compliance with Applicable Law. There is no customary law in Metropolitan France. Employee awareness on legal topics is raised through communication and training. The level of compliance to the environmental permit, containing the main environmental requirements, is high.</p> <p>However, regarding other environmental requirements, the level of completion of compliance action plans in the sectors of the Entity is low.</p>
1.2 Anti-Corruption	Minor Non-Conformance	<p>The Entity has implemented various mechanisms (including risk assessment and a new anti-corruption code) to work against Corruption in all its forms, consistently with Applicable Law and international standards. The Entity has improved its practices since the previous audit (including a new whistleblowing hotline and Ethics Committee), however, the implementation of some actions is still ongoing. The Entity has recorded no recent Corruption incident.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance. It is regularly reviewed (last review was in 2022) and has been widely communicated internally and externally. It is publicly disclosed on the Entity's website at:</p> <p><a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a></p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has developed, maintains and communicates both a Policy and Code of Conduct consistent with the environmental, social and governance practices of the ASI Performance Standard. They are regularly reviewed and updated (last review was in 2022), and are available at:</p> <p>Policy: <a href="https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque</a></p> <p>Code of Conduct: <a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a></p>
2.2a-c Leadership	Conformance	<p>The Commercial Manager, whom is a member of the Steering Committee, has been nominated as the ASI Management Representative. This role has the responsibility and authority for ensuring conformance with the ASI Performance Standard. Other managers (including the Human Resources (HR), Corporate Social Responsibility (CSR), and Communication Managers) also have responsibilities for the implementation and communication of the Policies. Adequate resources to implement and improve the Entity's ASI Management System are provided.</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</p>

CRITERION	RATING	COMMENT
		Management System according to ISO 50001. These systems are certified by an accredited certification body.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented and implemented a Social Management System. Whilst the system is not certified, it contains all of the main components of a system consistent with international standards.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Responsible Sourcing Policy addressing environmental, social and governance issues, including primarily the Purchasing Policy and a new Sustainable Procurement Charter, as well as an internal Due Diligence process. The Purchasing Policy and the Sustainable Procurement Charter are available at:</p> <p><a href="https://www.aluminiumdunkerque.fr/fournisseurs">https://www.aluminiumdunkerque.fr/fournisseurs</a></p> <p>These are regularly reviewed. Since the previous audit, improvements have been made regarding the Sustainable Procurement Charter and the suppliers' assessment.</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Facility is located in a highly regulated country (France), where major projects and changes must undergo a thorough analysis and authorisation process. The Entity has implemented processes to perform environmental and social Impact Assessments for New Projects or Major Changes, including consideration of how baseline conditions are affected by Historic Aluminium Operations. An environmental and social impact management plan would be defined, implemented and regularly reviewed. Consultation with internal and external Stakeholders as well as public disclosure of the assessments and plans within are included in the processes.</p> <p>As the Entity is commencing a New Project, it was checked that the process has been well implemented to date (e.g. risk assessment, information given to external Stakeholders).</p>
2.6a-h Human Rights Impact Assessment	Minor Non-Conformance	<p>The Facility is located in a highly regulated country (France), where major projects and changes must undergo a thorough analysis and authorisation process. There are no Indigenous Peoples in the area. There is no potential resettlement issue with future projects, as the Facility is within Dunkirk's harbour management area.</p> <p>The Entity has implemented processes to perform Human Rights Impact Assessments and implement/review a management plan for New Projects or Major Changes, including consideration of how Baseline Conditions are affected by Historic Aluminium Operations. Consultation with internal and external Stakeholders as well as public disclosure are included in the processes.</p> <p>For the new smelter project, no Material Human Rights impact has been identified by the Entity. However, the Human rights assessment, including a gender analysis, and its output are not clearly documented in the Entity's Impact Assessment for this project.</p>
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented a safety management system focused on major hazards and emergency plans that is regularly inspected by the authorities. Moreover, the Entity has implemented a certified ISO 14001 Environmental Management System including emergency preparedness and response. The Entity has its own fire and emergency brigade.

CRITERION	RATING	COMMENT
		<p>The Entity has developed its site specific Emergency Response Plans in collaboration with potentially affected Stakeholders (including authorities and Workers' representatives). This is predominantly an internal operation plan (POI) but also includes other emergency plans. They are regularly reviewed. Drills are duly performed. Significant progress has been made regarding these plans/drills compared to the previous audit.</p> <p>Due to the safety and security risks associated with full public disclosure of the plans, only the authorities and emergency services are fully informed. Some elements could be released publicly upon request, subject to management approval.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed, based on its risk assessment, various emergency or Business resilience plans (e.g. plans for civil conflicts, pandemic, natural disaster, and cyberattack). These plans are regularly reviewed, at least every five years or in case of any significant change/indication of a control gap.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>Mergers and acquisitions are not managed at local level but at Corporate Headquarters. In a merger or acquisition case, an environmental, social and governance Due Diligence process is activated according to a Corporate process. It would include consideration about Historical Aluminium Operations.</p> <p>The Entity was acquired by AIP effective 1 October 2021. An action plan was implemented and closed out in 2022. As such, the Facility is no longer involved in processes post-acquisition.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>Closure, decommissioning or divestment are not managed at local level but at Corporate Headquarters. In such a case, an environmental, social and governance review process would be activated, according to a closure plan. Stakeholders' consultations would take place and a plan for monitoring Material impacts, including legacy impacts, would be implemented, as required by French regulations. A closure plan was documented in 2016 by the previous owner, and has been updated in 2022 regarding the financial component.</p> <p>There has been no recent case of closure, decommissioning or divestment for the Entity.</p>
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has publicly disclosed its governance approach and its Material environmental, social and economic impacts on its website and in its Sustainability Report, available at:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity has publicly disclosed significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law, in its Sustainability Report, refer to page 54:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>

CRITERION	RATING	COMMENT
3.3a-c Payments to Governments	Conformance	The Entity has developed and implemented a Code of Conduct and processes related to financial transactions, including payments to governments. Only legal and obligatory payments related to taxes and duties are paid to governments. No financial or in-kind political contributions are made.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has implemented various mechanisms to address Stakeholder complaints, grievances and requests, especially the work council, a site committee with external stakeholders and the company website. The whistleblowing line is made available through the Sustainable Procurement Charter:</p> <p><a href="https://whistleblowersoftware.com/secure/98b1c541-3d45-4f93-bf1e-681d526f8fb2/channel-select">https://whistleblowersoftware.com/secure/98b1c541-3d45-4f93-bf1e-681d526f8fb2/channel-select</a></p> <p>A more direct access point will be provided following a website redesign in 2023.</p> <p>These mechanisms are regularly reviewed and shared with Stakeholders.</p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has performed complete Life Cycle Assessment (LCA) for its main Aluminium Product lines (slabs and ingots).
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has publicly disclosed its LCAs for its main Aluminium Product lines (slabs and ingots) on the website:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p> <p>On customer request, accurate information regarding the data of these assessments is also actually provided.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a process to minimise Aluminium Process Scrap. The Entity targets 100% of scrap for collection, recycling and/or re-use. Actions plans are implemented. Currently, most of the scrap is recycled internally. The Entity has implemented a process to segregate scraps by alloys and grades to facilitate recycling. This process includes labelling, inventory in storage register and training of employees.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity engages with some regional collection and recycling initiatives regarding the Circular Economy. Within its new Smelter project that aims to receive external scrap for recycling, the Entity is currently exploring partnerships with downstream customers to support recycling.
<b>5. GREENHOUSE GAS EMISSIONS</b>		



CRITERION	RATING	COMMENT
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity accounts for and publicly discloses its Material Greenhouse Gas (GHG) emissions and energy use, annually, in its Sustainability Report, pages 23 – 29:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p> <p>Data are independently verified prior to publication.</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable, as the Smelter has started production before 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	The Entity has a Mine to Metal GHG emissions intensity below 5 t CO <sub>2</sub> e/t Al (well below the 11 t CO <sub>2</sub> e /t Al threshold).
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan and ensured a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario, aligned with the Science-Based Targets initiative (SBTi). The GHG Emissions Reduction Pathway includes targets for 2025, 2030 and 2050, which addresses both Direct and Indirect GHG emissions.</p> <p>The GHG Emissions Reduction Plan and Pathways are regularly reviewed and are publicly disclosed annually in the Sustainability Report, pages 24-27, as well as the progress against the GHG Emissions Reduction Plan:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented an ISO 14001 Management System certified by a third party, which incorporates GHG emissions management.</p> <p>Operational control procedures, regular monitoring and audits (especially relating to the electrolysis process) are implemented to achieve performance aligned to the GHG Emissions Reduction Plan and targets.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity quantifies, monitors and manages its Emissions to Air, within its Area of Influence (limited to the Facility area, the loading dock and the airshed), according to French regulations and its certified ISO 14001 Environmental Management System.</p> <p>Air emissions are controlled at the Facility and around, according to local regulations and permits. Plans are implemented to reduce their impacts and regularly reviewed. The Entity publishes its air emissions and the actions plans in its annual Sustainability Report, pages 28-33:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>
6.2a-g Discharges to Water	Minor Non-Conformance	The Entity quantifies, monitors and manages its Discharges to Water, within its Area of Influence (limited to the Facility area and the loading

CRITERION	RATING	COMMENT
		<p>dock), according to French regulations and its certified ISO 14001 Environmental Management System.</p> <p>Discharges to Water are under strict control according to local regulations and permits. Plans are implemented to reduce their impacts. They are regularly reviewed. The Entity publishes its Discharges to Water in its annual Sustainability Report, page 36:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p> <p>However, the action plan is not publicly disclosed.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented a Management System, including emergency, monitoring and communication procedures, to manage major risks of Spills and Leakage. This system is regularly inspected by the French authority and is ISO 14001 certified. The Entity conducts periodic assessments of the major risks of Spills and Leakage through various risk analyses, which are reviewed by the French authority and/or covered by the ISO 14001 certification. The Entity has implemented management plans, that are regularly reviewed, to prevent, detect and remediate Spills and Leakages.</p> <p>Due to the safety and security risks associated with full public disclosure of the plans, only the authorities and emergency services are fully informed. Some elements could be released upon request, subject to management approval.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented procedures to disclose the volume, type and potential impact of significant Spills immediately after an incident.</p> <p>The Entity has implemented a process to publicly disclose significant incidents (including Spills), Impact Assessments and remediation actions taken, in its annual Sustainability Report, refer to page 39:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p> <p>There has been no significant Spill since the Entity joined ASI.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a waste management system, within its Area of Influence, included within its certified ISO 14001 Management System. Targets are defined. The recovery rate has improved significantly since the previous audit.</p> <p>The Entity's waste strategy has been developed in accordance with the Waste Mitigation Hierarchy. Waste management is implemented according to French regulations. The Entity has assessed impacts of its wastes on human health and the environment in its health and safety risk assessment and environmental analysis.</p> <p>The Entity discloses its Hazardous and Non-Hazardous Waste quantities and disposal methods in its annual Sustainability Report, page 37:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7a-f Spent Pot Lining (SPL)	Conformance	<p>All Spent Pot Lining (SPL) is stored internally in a building with appropriate containment facilities which are compliant with the Entity's permit. The Entity seeks to optimise processes for the recovery and recycling of carbon and refractory materials from SPL, as confirmed by its master plan. Internal processes are implemented to that end.</p> <p>Most carbon SPL is recovered. Some SPL are landfilled, but only after stabilisation treatment is performed by the waste contractor. The stabilisation and landfill facilities are authorised by the relevant French authority. The Entity reviews annually the alternative options to landfilling of treated SPL through its management review. More frequently, the action plan associated is reviewed and alternatives are discussed with external contractors.</p> <p>There is no discharge SPL to freshwater, brackish water or marine environments. This is confirmed by site inspection and waste tracking documents.</p>
6.8a-d Dross	Conformance	<p>The Entity stores and manages Dross (storage in covered area, retention pond) to prevent release to the environment. The Entity seeks to maximise the recovery of Aluminium contained in Dross and Dross residues, through internal processes and external refiners.</p> <p>An action plan is ongoing to optimise internal process and Dross storage capacity. It is well followed up. The Entity maximises the recycling of treated Dross residues, as there is no landfilling of Dross residues. All Dross residues are recovered. It is confirmed by waste tracking documents.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has identified and monitors its water withdrawal and use by source and type. The main use is for industrial back-up water for its closed cooling circuit. The Entity has assessed the water-related risks within its Area of Influence (i.e. watersheds of the plant area and loading dock). The assessment demonstrated a high risk level regarding water, consistent with the local authorities having high expectations regarding water and local context. The Entity publicly discloses water withdrawal and use by source and type, as well as the related risks in its annual Sustainability Report, pages 34-37:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>
7.2a-e Water Management	Conformance	<p>The Entity has implemented a Water Management Plan with time-bound targets, in conjunction with local authorities and organisations. It is reviewed annually and in case of significant change/indication of control gap.</p> <p>The Entity discloses the latest version of the management plans in its annual Sustainability Report, pages 34-37:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>

## 8. BIODIVERSITY AND ECOSYSTEM SERVICES

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Minor Non-Conformance	The Entity had previously assessed the risks and impacts on Biodiversity, within its Area of Influence (limited to the plant and the loading dock of the harbour), based on the data of the previous biodiversity studies. The Entity commenced a review of this assessment in 2023, with a more comprehensive inventory and risk assessment of the Biodiversity and Ecosystem Services. The inventory has begun in 2023 and is scheduled to continue until mid-2024. However, the assessment is currently incomplete.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as whilst the Entity's assessment on Ecosystem Services is currently ongoing, the Entity has identified the typical main Priority Ecosystem Services for an Aluminium Smelter, - the water resource ecosystem service. Actions to reduce water consumption are already undertaken with local authorities and relevant Affected Populations and Organisations.
8.2a-g Biodiversity Management	Minor Non-Conformance	<p>The Entity commenced a review of its Biodiversity risk assessment in 2023 with an aim to complete a more comprehensive inventory and risk assessment of the Biodiversity and Ecosystem Services. An action plan exists for the inventory and the development of a biodiversity action plan, but the Biodiversity Action Plan is not yet established. It will be developed by a qualified biodiversity specialist, in consultation with other local organisations.</p> <p>The Entity continues to implement various positive actions, including the peregrine falcons' nest repair and reforestation of a plot in the town of Gravelines. There is also no use of pesticides in the maintenance of vegetative areas.</p> <p>Public disclosure of both this commitment and work in progress has been presented in the Sustainability Report, page 39:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p> <p>However, the complete Biodiversity Action Plan remains in development and as such, is not yet publicly disclosed.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as whilst the Entity's assessment on Ecosystem Services is currently ongoing, the Entity has identified the typical main Priority Ecosystem Services for an Aluminium Smelter - the water resource ecosystem service. Actions to reduce water consumption are already undertaken with local authorities and relevant Affected Populations and Organisations. Significant reduction in consumption has been achieved since 2019.
8.4 Alien Species	Conformance	The Entity has assessed Alien Species as a low risk. However, the Entity takes preventive actions (such as fumigation) to avoid the accidental or deliberate introduction of Alien Species that could have significant adverse impacts on Biodiversity. Thorough inventory of Alien Species already present at the Facility is also ongoing, in order to implement measures to control them.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is not located near any World Heritage Properties ( <a href="https://whc.unesco.org/fr/list/">https://whc.unesco.org/fr/list/</a> ). There are no current or future projects that could impact World Heritage Properties.

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Conformance	<p>The Entity has identified Protected Areas within its Area of Influence and the Facility is not located within a regulatory Protected Area. There are some Protected Areas within a ten kilometre radius of the Entity.</p> <p>The plant is located in the National Area of Ecological, Faunistic and Floristic Interest (ZNIEFF) area 'la Plaine maritime flamande entre Watten, Loon-Plage et Oye-Plage', which is an area of interest with respect to fauna and flora and without regulatory constraints.</p> <p>Whilst there is no requirement for the development of management plans associated with the nearby Protected Areas or the ZNIEFF area, the Entity is developing a biodiversity management plan that will address the protection of notable species in the area under its control.</p>
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity commits to respecting Human Rights and observing the UN Guiding Principles on Business and Human Rights and has documented this commitment in gender responsive documents including the following:</p> <p>Code of Conduct: <a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a></p> <p>Policy: <a href="https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque</a></p> <p>Sustainable Procurement Charter: <a href="https://www.aluminiumdunkerque.fr/fournisseurs">https://www.aluminiumdunkerque.fr/fournisseurs</a></p> <p>These documents are reviewed at least every three years and in case of significant change/indication of control gap. The Entity has implemented a gender responsive Due diligence process to assess, prevent, mitigate and account for its current and potential impacts on Human Rights. It takes into account legacy impacts and is regularly reviewed. Mapping and consultation of Stakeholders is included in the process. Various risk assessments, controls and reviews are performed. If necessary, mitigation plans are activated and then followed up.</p> <p>There is no significant recent case of having caused or contributed to adverse Human Rights impacts at the Entity or in the supply chain. A minor number of individual disciplinary sanctions related to Harassment have been taken.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity commits in its Code of Conduct to prohibit all forms of Discrimination, including that based on gender. The Entity has a company agreement regarding equal rights for men and women.</p> <p>The Entity implements a program promoting gender equity and women's empowerment that addresses barriers to professional development, discrimination, violence and harassment. The program is regularly reviewed.</p> <p>Female Worker interviews confirmed the strong commitment of the Entity towards women's rights.</p>

CRITERION	RATING	COMMENT
		<p>The Entity publicly discloses the effectiveness of the measures taken to promote gender equity in its annual Sustainability Report, page 52:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p> <p>It also discloses its mandatory men and women equality index:</p> <p><a href="https://www.aluminiumdunkerque.fr/egalite-professionnelle-hommes-femmes">https://www.aluminiumdunkerque.fr/egalite-professionnelle-hommes-femmes</a></p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous People present in the area (Northern France).
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable, as there are no Indigenous People present in the area (Northern France).
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no Indigenous People present in the area (Northern France).
9.5a Cultural and Sacred Heritage - Identification	Conformance	There are no Indigenous People present in the area (Northern France). The Entity's plant is not located in any area with sacred or cultural heritage sites and values, according to both the Monumentum website and the World Heritage list.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable, as there are no Indigenous People present in the area (Northern France).
9.6a-i Displacement	Not Applicable	No resettlements have taken place during the period since joining ASI, nor are expected to occur during the certification period. There are also no Indigenous People in the area.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity is committed to respecting the legal and customary rights and interests of Local Communities. According to the Entity's risk assessment, there is no rural/remote Community dependent upon resources that may be affected by the Entity's operations.</p> <p>The Entity has a community engagement approach. Several mechanisms exist to engage with Local Communities and their representatives, as concerns are raised.</p> <p>The Entity's risk assessment process has not identified issues affecting Local Communities. However, the Entity supports the Local Communities through various partnerships (e.g. education, sports, culture, and environment). This action plan is regularly reviewed. The Entity publicly discloses its actions in the Sustainability Report, pages 56-59:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>

CRITERION	RATING	COMMENT
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has established a sound Management System to avoid any involvement in armed conflict or Human Rights abuses including a clear Policy documented in its Code of Conduct and its Sustainable Procurement Charter, the definition of responsibilities and attribution of resources in the Procurement Team, a Due Diligence procedure duly documented, the collection of information regarding suppliers through the Heidelberg conflict barometer and an a questionnaire sent to these suppliers, and a grievance mechanism.
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has implemented a Due Diligence procedure that includes the identification and assessment of Conflict-Affected and High-Risk Areas risks in its supply chain. Risks have been assessed for all main suppliers, considering the Heidelberg conflict barometer and responses to questionnaires sent to these suppliers.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity has implemented a Due Diligence procedure that includes the way to respond to identified Conflict-Affected and High-Risk Areas risks in its Aluminium supply chain. A mitigation plan is documented, shared with senior management and followed up.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity has prepared itself to be audited by a third party on its Due Diligence practices. This present ASI Audit report provides evidence of this.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity reports annually on its supply chain Due Diligence in its Sustainability Report, page p54: <a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a>
9.9 Security practice	Conformance	The Entity has an internal security officer and employs an external private security provider to verify the entries to and exits off site. Regular verifications to ensure all security staff members hold their national authorisations are undertaken, and which are up to date. Security provider personnel are not armed, and no complaints against security agents have been received.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the Freedom of Association and the rights of Workers to collective bargaining. A specific agreement with Labour Unions exists at the Entity. The Entity participates in good faith to its implementation. A decision to join a labour union is made solely by the Worker. Labor Unions are free to organise, elect their representatives and collectively bargain on behalf of workers. Interviews with managers, workers and workers representative have confirmed these elements.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the right to Freedom of Association and Collective Bargaining is not restricted in France.
10.2a-c Child Labour	Conformance	The Entity strictly prohibits Child Labour that is not in accordance with law and conventions of the International Labour Organisation, as

CRITERION	RATING	COMMENT
		<p>documented in its Code of Conduct and Sustainable Procurement Charter. These documents can be found at:</p> <p><a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a> and <a href="https://www.aluminiumdunkerque.fr/fournisseurs">https://www.aluminiumdunkerque.fr/fournisseurs</a></p> <p>The minimum working age of 15 years is globally required, but at the Entity, the minimum working age is 18 years.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity strictly prohibits Forced Labour, as documented in its Code of Conduct and Sustainable Procurement Charter. These documents can be found at:</p> <p><a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a> and <a href="https://www.aluminiumdunkerque.fr/fournisseurs">https://www.aluminiumdunkerque.fr/fournisseurs</a></p> <p>Regarding suppliers, a Due Diligence process regarding Forced Labour is also implemented.</p> <p>The Entity has implemented practices to prevent any direct or indirect practices related to Forced labour, including Debt Bondage, Human Trafficking, retention of identity papers. Interviews and site inspection confirmed that there is no Forced Labour or related practices at the Facility.</p> <p>It was checked that the Entity has prepared, for its next annual 2022 Sustainability Report, a public disclosure of a Modern Slavery Statement detailing actions addressing modern slavery (i.e. communication of the Code of Conduct to suppliers, and Due Diligence process).</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has documented its commitment to equal opportunities and zero tolerance to Discrimination in its Code of Conduct:</p> <p><a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a></p> <p>Job appraisals are performed during annual performance reviews with objective criteria. Differences are analysed periodically with the Workers' representative in order to correct potential discrepancies.</p> <p>The Entity promotes a culture of non-discrimination through various communications and trainings There has been no recent case of Discrimination recorded.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has an open and inclusive communication process between management, Workers and Workers' representatives. It allows the raising of concerns, to report non-conformities and to suggest improvements.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented a Code of Conduct and internal rules, in consultation with Workers and their representatives. It prohibits the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. The Code of Conduct is regularly reviewed (at least every five years and in case of significant change or indication of control gap) and is publicly disclosed:</p> <p><a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a></p> <p>Violence and Harassment risks are included in the Entity's risk assessment and improvement actions are implemented.</p>



CRITERION	RATING	COMMENT
		The Entity provides regular information and training on Violence and Harassment risks and prevention/protection measures (in particular 100% of employees trained in the last years and two employees nominated as violence/harassment referents, as requested by French law)
10.7a-d Remuneration	Conformance	The Entity ensures that Workers have a written, understandable work contract. Wages are defined by French regulations, the collective agreement of the chemical industry and company agreements. Wages exceed the legal minimum standard and respect the industry minimum standard. The Entity makes monthly wage payments according to French regulations, in a punctual manner. All Workers receive payslips with payment details. The Entity pays a premium of at least the equivalent of 25% for work exceeding 35 hours per week as defined by French law.
10.8a-c Working Time	Conformance	The Entity complies with French Applicable Law and the collective agreement of the chemical industry on Working Time, Overtime working hours, public holidays and paid annual leave. Company agreements regarding Working Time and shorter working hours also exist. A time management system is implemented to follow up Overtime working hours and paid leave. The Entity ensures Workers receive an average of one day off per seven day period, and a less than eight hour workday on average over a six-month period, as checked in the time management system.
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity regularly informs Workers of their Rights through onboarding, communication channels and the Human Resources team. Workers' representatives are also an important relay of information for Workers about their Rights.</p> <p>The right to Freedom of Association and Collective Bargaining is not restricted by law in France.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has documented and implemented an Occupational Health and Safety (OH&S) Management System. The system is not certified however it contains the main components of a system consistent with international standards. The Management System is applicable to all Workers and Visitors. Some elements of the System (including the focus on fatal risks, and contractors' prevention plan) have been significantly improved in the previous year.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The OH&amp;S Management System is reviewed quarterly and more globally annually, taking into account any significant changes and indication of control gap). Many leading and lagging indicators are also reviewed.</p> <p>However, the public disclosure of these indicators, as well as the comparative analysis of performance with peer businesses, in the Sustainability Report is incomplete. Refer to page 43:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity provides Workers with various mechanisms to discuss and participate in the resolution of Occupational Health and Safety issues

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		with management. In particular, a joint Health and Safety Committee for Workers and a Health and Safety Committee with the main contractors both exist at the Entity.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	3 August 2020	Issued (Initial Certification Audit)
1	25 November 2021	Surveillance Audit; Update to Member Name and Entity Name to reflect change in ownership of the Entity; Corrected the date of the Initial Certification Audit in the Audit Scope description.
2	30 June 2023	Re-Certification Audit and Scope Change – Full Certification; Scope Change to apply V3; Minor editorial changes to the Audit Scope description for the Certification Audit and Surveillance Audit.