
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALUMINERIE ALOUETTE

CERTIFICATE
NUMBER

85

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

CERTIFICATION

ASI ACCREDITED
AUDITOR

BNQ

DATE OF ISSUE

13 JULY 2020

DATE OF EXPIRY

12 JULY 2023

CERTIFIED SINCE

13 JULY 2020

AUTHORISED BY

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

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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

Aluminium smelter, casthouse and operational
activities conducted at Alouette facilities in
Canada.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME Aluminerie Alouette

ENTITY NAME Aluminerie Alouette Inc.

CERTIFICATION SCOPE Aluminium smelter, casthouse and operational activities conducted at Alouette facilities in Canada.

SUPPLY CHAIN ACTIVITIES

- Aluminium Smelting
- Casthouses

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- First Certification Audit

AUDIT FIRM BNQ

AUDIT DATE

- 9 . 13 December 2019

AUDIT REPORT SUBMISSION

- 24 June 2020

AUDIT SCOPE The audit scope covered the operations, maintenance and services required for the production of primary aluminium.

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.
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- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 13 July 2020 - 12 July 2023

NEXT AUDIT TYPE Surveillance audit

NEXT AUDIT DUE DATE 12 January 2022

CERTIFICATE NUMBER 85

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity maintains awareness of its legal requirements and of any changes in the law that may impact it. To this end, it benefits from legal watch services offered by several expert firms in the field of forensic accounting. They are mandated to inform the Entity of any change that may affect it, in particular in terms of labour law or taxation. The entity is also supported by specialized consultancy when negotiating large-scale special contracts. Moreover, a financial audit exercise is carried out quarterly and annually. Legal compliance matters are discussed through the Owners Committee annual meeting because Alouette is a Consortium.</p> <p>Annually, representatives from all of the Entity's major departments sign a compliance certificate addressed to the members and alternate members of the Owners' Committee of the Entity. This certificate is a declaration of conformity relating to a plurality of domains such as labour law, fiscal legislation, environmental and Occupational Health and Safety (OHS) legislation.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity implements two written codes of ethics and conduct: one for business partners, and another one for the conduct of business by the Entity's employees. Those codes include principles relevant to environmental, social as well as governance performance, and are available on the Entity's webpage (https://www.alouette.com/en/our-commitment/governance).</p> <p>The code for the conduct of business is presented to every new employee and serves as a good practice guide. This code is supported by a respectful workplace Policy. The code of conduct for business partners is communicated to each supplier, either through commercial contract documents or through an awareness letter.</p> <p>A whistle-blowing mechanism has been put in place, supported by a neutral and impartial external firm.</p>
1.3 Code of Conduct	Conformance	<p>The Entity implements two written codes of ethics and conduct: one for business partners, and another one for the conduct of business by the</p>

CRITERION	RATING	COMMENT
		<p>Entity's employees. Those codes include principles relevant to environmental, social as well as governance performance, and are available on the Entity's webpage (https://www.alouette.com/en/our-commitment/governance).</p> <p>The code for the conduct of business is presented to every new employee and serves as a good practice guide. This code is supported by a Respectful Workplace Policy. The code of conduct for business partners is communicated to each supplier, either through commercial contract documents or through an awareness letter.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity implements organizational practices as well as policies that proved to be consistent with the environmental, social, and governance practices included in this Standard.</p> <p>Policies include an Occupational Health and Safety (OHS) Policy, an Environmental Policy, a Responsible Energy Management Policy, a Quality Management Policy, as well as an Information Security Management Policy.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>All of the policies cited in 2.1a are signed, thus endorsed, by the President and CEO of the Entity which provides resources accordingly.</p> <p>The review and approval of those policies are carried out by the Executive and Management under a defined frequency.</p> <p>Moreover, the implementation of policies and procedures is validated by an audit process (internal and external).</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity communicates its OHS, Environmental, Energy as well as Information Security Policies internally through their prominent display (physically and electronically), the induction of new employees and contractors, several awareness initiatives (regular meetings) and refresher training opportunities.</p> <p>The Policies can be made available on request via the company's external website https://www.alouette.com/en and Internally on the</p>

CRITERION	RATING	COMMENT
		<p>Portal (the intranet site only available in French for the Entity's employees).</p>
2.2 Leadership	Conformance	<p>The Management Systems Director is the main contact for ASI correspondence or requests, is the Entity's senior Management Representative having overall responsibility and authority for ensuring conformance with the requirements of this Standard with the help of the Chief Financial Officer as financial contact.</p> <p>He is also supported in his duty by an internal ASI Implementation Committee composed of the following representatives:</p> <ul style="list-style-type: none"> - Director . Communication & Training - Superintendent . Management Systems & Continuous Improvement - Senior Advisor . Management Systems - Advisor . Compliance Health, Safety & Environment - Advisor . Human Resources - Coordinator - Management Systems <p>The Entity also implements of a lean management visual station "Project ASI" to monitor the implementation of the Performance Standard with the ASI Implementation Committee members.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has implemented, through the integration of various processes and business practices, elements relevant to the management of environmental issues. Indeed, the Entity's environmental management system (EMS) has been certified under the ISO 14001 Standard since 2005.</p> <p>The valid ISO 14001 certificate can be viewed using the following link: https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=&noCertificat=53320-2-01.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity implements, through the integration of various processes and business practices, elements relevant to the management of social issues.</p> <p>Risks associated with the social sphere are assessed at a broader managerial scale. Furthermore, periodic surveys are conducted to</p>

CRITERION	RATING	COMMENT
		<p>measure employee satisfaction as well as commitment to work.</p> <p>Occupational Health and Safety (OHS) management of partners, subcontractors, contractors is integrated into the organization's current activities.</p> <p>The Entity has been ISO 14001 and OHSAS 18001 certified since 2005; currently to the 2015 version of the 14001 standard and to the 2007 version of the 18001 standard. Please see the valid OHSAS 18001 Certificate of the Entity: https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=&noCertificat=53320-3-01.</p>
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity has implemented a responsible sourcing policy that meets the criterion. This policy is deployed through a variety of tools which include, amongst others: a procedure for managing purchases of goods and services, a suppliers' code of conduct, procurement guidelines established by the Alumina Committee, a supplier audit program and a supplier preselection questionnaire.</p> <p>However, the evidence of due diligence relating to the supply of alumina are not systematically available at the Entity's site since it is the Owners of the Consortium who directly manage the supply of alumina.</p>
2.5 Impact Assessments	Conformance	<p>The Entity has demonstrated its ability to conduct environmental, social, cultural and human rights impact assessments for new projects or major changes to existing facilities. The Impacts Assessments Studies were satisfying the legal requirements since the governments authorised the construction and extension of this smelter and its related facilities.</p> <p>Indeed, management of operational changes, significant project or major modifications to existing facilities are supervised by a defined process that includes global and comprehensive risk analysis, including impacts on First Nations (if any).</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has developed site specific emergency response plans (ERP) in collaboration with potentially affected stakeholders' groups such as communities, workers and their representatives,</p>

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		and relevant agencies. The Alouette ERP satisfies ISO 14001 and OHSAS 18001 Standards.
2.7 Mergers and Acquisitions	Conformance	The due diligence process for mergers and acquisition materializes through the Owner's (the Consortium) Agreement that contains clauses governing the management of assets. The process is adequate with the criterion requirements.
2.8 Closure, Decommissioning and Divestment	Conformance	The due diligence process for closure or decommissioning takes into account environmental, social and governance aspects. Indeed, the Owner's Agreement contains clauses governing the management of assets, in particular the decommissioning of equipment in accordance with applicable environmental requirements.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity, through its annual sustainability report, publicly discloses its governance approach and its material environmental, social and economic impacts. The 2018 sustainability report is available on the Entity's webpage (https://www.alouette.com/en/the-environment/sustainable-development-reports).
3.2 Non-compliance and liabilities	Minor Non-Conformance	In the recent history of Alouette, no significant judgment, fine, penalty or sanction resulting from a major non-compliance has occurred (monetary or other). However, if necessary, the company would report this information via its annual sustainable development report. If any, non-compliance will be then published the same way as for the same subject for which compliance data are currently published for OHS and environmental indicators (https://www.alouette.com/en/the-environment/sustainable-development-reports). However, the mode of public disclosure of non-compliance (NC) and liabilities is not fully compliant with ASI requirements because the publication is not systematically controlled by the Entity (a minor infraction was found to be exclusively published by the Provincial Ministry of the Environment).
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes payments to governments on a legal and/or contractual basis. Those payments are all verified by government revenue agencies. Moreover, energy distribution contracts

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		signed with a state-owned company are subject to a government decree.
3.3b Payments to governments (disclosure . bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity, through various means, implements a complaint resolution tools or mechanisms that are adequate to address stakeholder complaints, grievances or requests for information relating to its operations.</p> <p>The preferred way to resolve disputes is through open dialogue. Internal stakeholders can use those tools that are the advisory committee (participatory management mechanism), the environment, health and safety committee, or the whistle-blowing mechanism that has recently been put in place, supported by a neutral and impartial external firm.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity evaluated life cycle impacts of its only primary aluminium product which is a low profile sow cast. A life cycle analysis was performed in 2013 by an external and independent firm on behalf of the Aluminium Association of Canada (AAC) to establish the carbon footprint of an aluminium ingot produced in the Province of Quebec (available only in French : https://www.economie.gouv.qc.ca/fr/bibliotheques/secteurs/environnement/empreinte-carbone-des-produits/lavantage-carbone-quebecois-le-cas-de-laluminium-primaire/).</p> <p>A personalized analysis of the report has been prepared for the Entity and presents results even slightly below the Quebec average in carbon footprint.</p> <p>For the purposes of the Environmental Impact Studies and to respect the ISO 14001:2015 requirements, other families of impacts have also been evaluated by the Entity (e.g. the water life cycle on site, the raw material as well as the residues in a circular economy approach, etc.).</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	As a joint venture, the Entity provides life cycle information (mainly greenhouse gas emissions) on request to its owners (for themselves or for their customers).

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		<p>The completed forms requested by the shareholders for previous LCA information requests are recorded by the Environment team. Certificate of analysis for finished aluminium products are readily available to shareholders.</p>
<p>4.1c Environmental Life Cycle Assessment (public communication)</p>	<p>Conformance</p>	<p>The methodology, the data used, the limits and the system boundaries as well as the results of the Quantis study on the carbon footprint of Quebec aluminium are available on the website of the Province of Quebec Ministry of Economy and Innovation (available only in French):</p> <p>https://www.economie.gouv.qc.ca/fr/bibliotheques/secteurs/environnement/empreinte-carbone-des-produits/lavantage-carbone-quebecois-le-cas-de-laluminium-primaire/.</p>
<p>4.2 Product design</p>	<p>Not Applicable</p>	<p>This criterion is not applicable to the Entity's Certification Scope.</p>
<p>4.3a Aluminium Process Scrap (targets)</p>	<p>Conformance</p>	<p>The Entity minimizes the generation of aluminium process scrap within its own operations. A rejection rate indicator is continuously monitored and challenged at the casthouse (through a lean management visual station) and via the internal dashboard of the Metal sector.</p> <p>The Entity's philosophy is to manage the residual materials generated by its activities using the principle of 4R (Reduce, Reuse, Recycle and Recover) in order to eliminate landfill. 100% of the aluminium is recycled.</p>
<p>4.3b Aluminium Process Scrap (alloy separation)</p>	<p>Conformance</p>	<p>There is no production or recycling of aluminium alloys by the Entity which produce only high purity primary aluminium. Off specs aluminium and by-products are recycled internally, or externally, in accordance with the allowances accepted by the owners.</p>
<p>4.4a Collection and recycling of products at end-of-life (strategy)</p>	<p>Conformance</p>	<p>The Entity's recycling strategy is described in its Residual Materials Management Plan and is aimed at optimizing aluminium recycling according to the 4R principle in order to eliminate landfill.</p> <p>The implementation of that plan has been successfully verified through ISO 14001 audits.</p>

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4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>The Entity with the support of AAC (Aluminium Association of Canada) has implemented a collection and recycling strategy for years.</p> <p>Accurate measurement and effort are displayed locally, regionally and nationally by all AAC members including the Entity.</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The 2018 annual sustainable development report is available to the general public via the company's website. Annual Sustainable Development Reports for previous years (2010 to 2017) are also available.</p> <p>The 2018 sustainable development report presents a graph of specific energy consumption for smelting and direct greenhouse gas (GHG) emissions by sources :</p> <p>~ The Scope 1 Direct greenhouse gas (GHG) emissions were 1.87 t CO₂ eq. / t Al in 2018.</p> <p>~ The Scope 2 Indirect GHG emissions are not significant as the only source of energy used is 100 % from Hydro-Quebec's hydroelectricity (which is very low in CO₂ emissions with less than 0.01 t CO₂ eq. / t Al).</p> <p>The 2018 sustainable development report is available at: https://www.alouette.com/en/the-environment/sustainable-development-reports (see page 8 for GHG emissions and page 7 for energy use).</p>
5.2 GHG emissions reductions	Minor Non-Conformance	<p>As specified in the 2018 sustainable development report, the company is pursuing its reduction efforts by implementing various initiatives, including that of being supplied with natural gas. The 2018 sustainability report is available at https://www.alouette.com/en/the-environment/sustainable-development-reports (see page 8 for the GHG emissions and page 15 for the upcoming natural gas supply).</p> <p>The Entity is already achieving excellent direct emission intensity for its reduction technology and will soon have the opportunity to reduce its direct GHG emissions related to the replacement of diesel by natural gas. The intensity emission caps for its</p>

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		<p>reduction technology are already published by the Government of the Province of Quebec as part of the Quebec's Carbon Cap and Trade System for 2021 to 2023.</p> <p>However, the Entity has not yet directly published its quantitative direct emissions reduction target for the upcoming years.</p>
5.3a Aluminium Smelting (management system)	Conformance	<p>The environmental management system adequately covers the various aspects of GHG and ensures emissions are well below the criterion of 8 t CO₂ eq. / t Al.</p> <p>As required by Quebec regulations regard the Cap and Trade System, direct GHG emissions and the quantification process are verified annually by an accredited third party.</p> <p>This Entity is also currently ISO 14001 certified.</p>
5.3b Aluminium Smelting (up to and including 2020)	Conformance	<p>The company's records go back to the beginning of its operations in 1992. The results of the Scope 1 and Scope 2 GHG emissions from the production of Aluminium have been maintained below the level of 8 t CO₂ eq. /t Al since the original start-up.</p> <p>As required by Quebec regulations regard the Cap and Trade System, direct GHG emissions and the quantification process are verified annually by an accredited third party.</p>
5.3c Aluminium Smelting (after 2020)	Conformance	<p>Any increase in production is highly expected to be at the same greenhouse gas (GHG) performance or better than the existing facility as the facilities will continue to be operated with similar technology (or a better one) and the same energy source (Hydro-Quebec's hydroelectricity which is very low in CO₂ emissions).</p>
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>Air emissions are quantified annually, and reported to the provincial and federal governments as well as in the company's sustainability report. The company has various facilities for controlling atmospheric emissions as well as ambient air sampling stations.in conformity with its Provincial Environmental Permit.</p> <p>The Entity is closely monitoring its emission to air</p>

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		<p>with the help of their environmental management system (EMS) and preventive action plans are in place to keep these emissions in conformance with the legal requirements. This EMS is currently certified to ISO 14001:2015.</p>
6.2 Discharges to Water	Conformance	<p>No process water is released to the environment.</p> <p>The runoff from the site is routed to a sedimentation basin and sampling of the final effluent is carried out continually. The results are reported monthly to the provincial Ministry of Environment for the purposes of the provincial Environmental Permit. Annual results are also published in the company's sustainable development report.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity's procedure on risk management defines the methodology and criteria for evaluating environmental, health and safety (EHS) risks, including spills and leaks that may contaminate air, water and/or soil.</p> <p>The Entity is currently certified to ISO 14001:2015.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>Preventive maintenance programs are scheduled and performed.</p> <p>Temporary shutdowns of air scrubbing equipment are planned to reduce impacts on vegetation and the community. A go-no-go process and communication to stakeholders are in place.</p> <p>Inspections and monitoring with alarm detection are carried out to detect spills or equipment failures. Emergency Response Plans (ERP), including disclosure to authorities, are in place in case of equipment failure or spills.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>Any spill or leak is declared to provincial and federal governmental authorities. The follow-up with the governmental agencies is carried out by the Environment team of the Entity.</p> <p>Spills (if any), as well as planned and unplanned equipment shut downs (air scrubbers and dust collectors) are tracked and included in the monthly and annual reports transmitted to the provincial ministry of the Environment for the purposes of the Provincial Environmental Permit of the Entity.</p> <p>For major planned shut downs on air scrubbers (to</p>

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		<p>ensure efficiency of the equipment in the long-term), the Entity informs the local (municipal) authorities and other stakeholders to explain the reasons, anticipated impacts and mitigation measures.</p>
<p>6.4b Reporting of Spills (regular reporting)</p>	<p>Conformance</p>	<p>The Entity has implemented the required mechanisms in place to be able to publicly disclose impact assessments of the spills (if any) and remediation actions taken through its sustainability report.</p> <p>Spill management and Emergency Response Plans (ERP) deployments or drills have been audited for the purposes of ISO 14001. ERP Debriefing are covering Impact Assessments of the spills (if any) and remediation actions taken.</p>
<p>6.5a Waste management and reporting (strategy)</p>	<p>Conformance</p>	<p>According to the supplied evidence, the waste management strategy is described in the waste management plan and is based on the life cycle analysis of residues and the principles of mitigation hierarchy.</p> <p>Projects and initiatives on waste reduction or recycling are implemented to improve the performance. The long-term objective is to have a zero waste landfilled.</p> <p>The Entity has Golden Level Provincial Certification since 2017 for its Waste Management plan. The Entity uses a circular economy approach for their waste management plan and is ISO 14001:2015 certified.</p>
<p>6.5b Waste management and reporting (disclosure)</p>	<p>Conformance</p>	<p>Through its Sustainable Development Annual report, the Entity discloses the summary of hazardous and non-hazardous waste with the disposal method.</p> <p>In addition, Spent Pot Lining (SPL) is independently reported from the other hazardous wastes of the Entity.</p> <p>The Entity 2018 sustainability report is available at: https://www.alouette.com/en/the-environment/sustainable-development-reports (see page 6 for the wastes).</p>
<p>6.6a Bauxite Residue (storage construction)</p>	<p>Not Applicable</p>	<p>This criterion is not applicable to the Entity's Certification Scope.</p>

CRITERION	RATING	COMMENT
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)	Conformance	<p>The Entity has been able to demonstrate its ability to store and manage spent pot lining (SPL) in a way that prevents the release or leachate of it to the environment. Indeed, an approved building with a certificate of authorization from the Provincial Ministry of Environment allows a safe storage of SPL.</p> <p>A detailed procedure is followed to ensure the safe loading/unloading operations and to minimize particle emissions.</p> <p>Official quarterly inspections are conducted and documented.</p>
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has been able to demonstrate its ability to optimize processes for the recovery and recycling of carbon and refractory materials from spent pot lining (SPL).
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity does not landfill untreated spent pot lining (SPL) where there is the potential for adverse environmental effects. Rather, SPL is stored inside a controlled warehouse. There is no SPL landfilled or stockpiled outside. All SPL is sent to an external and approved SPL treatment plant.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	<p>The Entity does not landfill treated spent pot lining (SPL) nor stockpile SPL. All SPL is sent to an approved external SPL treatment plant. SPL management plan is regularly reviewed.</p> <p>Treated SPL residue (the refractory portion) is occasionally sent by the SPL treatment Plant to authorised landfill sites or maybe also recycled or valorised.</p>

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6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity does not discharge spent pot lining (SPL) into the environment, including marine or aquatic environments. The SPL management plan has been audited for years for the purpose of the ISO 14001 certification.
6.8a Dross (recovery)	Conformance	<p>According to the supplied evidence, internal recycling of dross is privileged.</p> <p>The other portion of dross is recycled by external specialized and authorized firms. The recovery rate of aluminium and other dross residues is maximized depending on the mandated firm.</p>
6.8b Dross (recycling)	Conformance	<p>The Entity maximizes the recycling of treated dross residues.</p> <p>In some cases, 100% of the residue is recycled while in other situations, a small fraction is buried in authorized sites.</p>
6.8c Dross (review of alternatives)	Conformance	The Entity does review alternative options to landfilling of dross residues. In addition, a strategic management plan is implemented to reduce landfill and technological improvements are currently going on.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	<p>A life cycle assessment has been performed on the water usage for the site. Water is totally provided by the municipal pumping systems.</p> <p>The water is used mostly as cooling water for the process and for domestic purposes.</p> <p>The Entity does not own nor control any hydropower facility or directly withdraw fresh or underground water for operational or domestic reasons. The only groundwater withdrawal is in non-significant quantities for the purpose of the environmental monitoring.</p>
7.1b Water assessment (risk assessment)	Conformance	<p>The water life cycle assessment helps to demonstrate the following. All process cooling water is sent the two Fume Treatment Centres (CTF: the Fume Scrubbers).</p> <p>There is no process effluent discharged to the environment or to any sewer. All run-off water is collected and treated in a settling pond and monitored before discharging into the St-Laurent</p>

CRITERION	RATING	COMMENT
		<p>Gulf.</p> <p>Domestic effluents are collected and disposed into the city wastewater treatment facility, next to the plant.</p> <p>Globally, the Entity's site and facilities have no significant influence or material risk on water quality in the watersheds of the area of influence.</p>
7.2a Water management (management plans)	Conformance	<p>The water management procedure of the Entity includes a monitoring of the run-off water collected and discharged as well as underground water.</p> <p>The Entity reports these results to the Provincial Ministry of Environment for the purposes of the Provincial Environmental Permit.</p> <p>Globally, the Entity's site and facilities have no significant influence or material risk on water quality in the watersheds of the area of influence.</p>
7.2b Water management (monitoring)	Conformance	<p>The monitoring of the effectiveness of the water management plan is performed through the monitoring of the results of the run-off effluent, making sure they stay below the regulatory limits.</p> <p>All data and exceedances, if any, are reported and corrected as prescribed by the environmental permit. The data show the effectiveness of the plans.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>A summary of the water data is included in annual sustainability reports presented to the different stakeholders.</p> <p>The water consumption does not present a significant impact, as all process water is reused internally.</p> <p>The water consumption and the run-off water results are presented in the 2018 sustainability report at https://www.alouette.com/en/the-environment/sustainable-development-reports (see page 10).</p> <p>Globally, the Entity's site and facilities have no significant influence or material risk on water quality in the watersheds of the area of influence.</p>

CRITERION	RATING	COMMENT
8.1 Biodiversity assessment	Conformance	<p>Full impacts assessment studies were conducted by a third party in 1989 for Phase 1 and in 2002 for Phase 2 expansion projects. In 2009, a new study was performed for a potential expansion project.</p> <p>The risk studies on biodiversity demonstrated the absence of threatened or vulnerable species in the area of influence.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>The biodiversity action plan (BAP) is driven by the provincial environmental permit, which requires the monitoring of all potential impact factors on biodiversity.</p> <p>Surveys and monitoring are conducted annually with the use of bio-indicators. In addition, an ambient air monitoring program covers the area of influence. No impacts have been noted so far. A voluntary annual inspection of targeted vegetation is also implemented by the Entity.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The biodiversity action plan meets the criterion as the main stakeholder concerned, the Provincial Ministry of Environment, did develop the specifications and requirements of the monitoring programs. Impact assessments were subject to public consultations, before construction and expansion.</p> <p>The Entity approach is respecting the Mitigation Hierarchy as avoidance and minimisation measures are already in place. Up to now, rehabilitation, restoration or offsetting measures were not required.</p>
8.2c Biodiversity management (reporting)	Conformance	<p>A summary of the results of the ambient air and impacts on the biodiversity are presented in annual sustainability reports.</p> <p>The report was also shared with the stakeholders and is available at https://www.alouette.com/en/the-environment/sustainable-development-reports (see pages 11 and 12).</p>
8.3 Alien Species	Conformance	<p>The Entity has implemented a procedure to manage the risk of alien species introduction, mainly related to foreign packaging materials.</p> <p>The Entity requires that all vessels are certified by Rightship Approval and follow the International</p>

CRITERION	RATING	COMMENT
		Marine Organization (IMO) procedures for the ballast water.
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	<p>The Entity puts diligent efforts to respect human rights in ways appropriate to its size and circumstances. Those efforts include: the implementation of a respectful workplace policy, a procedure for behaviour management, the setup of an advisory committee, as well as the code of conduct of business by the Entity's employees.</p> <p>Furthermore, the respectful workplace policy explicitly refers to the Canadian Charter of Rights and Freedoms of 1982.</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity puts diligent efforts to respect human rights in ways appropriate to its size and circumstances. Those efforts include: the implementation of a respectful workplace policy, a procedure for behaviour management, the setup of an advisory committee, as well as the code of conduct of business by the Entity's employees.</p> <p>Furthermore, the respectful workplace policy explicitly refers to the Canadian Charter of Rights and Freedoms of 1982.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity puts diligent efforts to respect human rights in ways appropriate to its size and circumstances. Those efforts include: the implementation of a respectful workplace policy, a procedure for behaviour management, the setup of an advisory committee, as well as the code of</p>

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		<p>conduct of business by the Entity's employees.</p> <p>Furthermore, the respectful workplace policy explicitly refers to the Canadian Charter of Rights and Freedoms of 1982.</p>
9.2 Women's Rights	Conformance	<p>The Entity implements the necessary policies, processes or mechanisms to ensure respect for the right and interests of women.</p> <p>Moreover, the code of conduct of business by the Entity's employees as well as the respectful workplace policy or the procedure for behaviour management further contribute in ensuring the respect for the right and interests of women.</p>
9.3 Indigenous Peoples	Conformance	<p>The Entity does what is necessary to consult and cooperate in good faith with the local native community.</p> <p>Indigenous peoples are consulted each time the Entity puts forward an initiative, including land use, manpower issues (employability), economic opportunities and presence in the community.</p> <p>Permanent communication channels are implemented between the Entity and the band council.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>The Entity does what is necessary in order to obtain free, prior and informed consent (FPIC) of the local native community prior to the approval of any project affecting their lands or territories and other resources.</p>
9.5 Cultural and sacred heritage	Conformance	<p>Considering the fact that no human presence nor socio-economic activities were impacted on the Marconi Peninsula during the establishment of the factory and its expansion, and that no heritage, sacred or cultural site was thus incidentally impacted, no specific action was required from the Entity to avoid or remedy impacts.</p> <p>However, permanent communication channels are implemented between the Entity and the band council.</p>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The environmental impact assessments demonstrate that the plant is located in an industrial sector dedicated to heavy industry and complies with the development plan and zoning plan of the</p>

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		<p>City of Sept-Îles (Province of Quebec).</p> <p>No significant impact on land use was found.</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>Since no displacement or relocation of human activities has occurred or is foreseen, there is no resettlement action plan required for any project or current operations.</p> <p>The closest community lives 14 km from the plant. There are no neighbours, recreational or commercial activities around the Entity's site, except for some port activities.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity demonstrated that it respects the legal and customary rights and interests of local communities through the impact study associated with the most recent expansion of the plant.</p> <p>Stakeholders group representatives including the first nations have been met in interview for the purposes of this ASI-PS Certification Audit.</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity prevents and addresses any adverse impacts on local community livelihoods (through its participation in the Environmental Monitoring Observatory of Sept-Îles Bay http://baie.septiles.ca/index.php (available only in French) and the Air Quality Round Table of Sept-Îles (http://air.septiles.ca/index.php) (available only in French or the most recent external perception survey).</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity demonstrated that it explores with local communities opportunities to respect and support their livelihoods (through its support to economic development organizations, particularly with respect to initiatives highlighting the expertise of aboriginal businesses).</p> <p>Stakeholders group representatives including the first nations have been met in interview for the purposes of this ASI-PS Certification audit.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity does not contribute to armed conflict nor human rights abuses in conflict-affected and high-risk areas.</p> <p>The Entity's site is not located in a conflict or high-risk area, as Canada has been assessed as a low risk country. The Entity has provision to prevent</p>

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		supplying raw materials in conflict-affected and high-risk areas.
9.9 Security practice	Conformance	<p>A private contractor manages the site security. An internal procedure describes the control and access process to the site.</p> <p>The Emergency Response Plan covers the security of the site. Security practices follow recognised good standards.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The Entity has demonstrated that it respects the rights of workers to associate freely and collectively bargain. Entity's workers aren't associated in a union but rather negotiate their working conditions through an Advisory Committee. Members of the committee consist mainly of elected representatives from the workers.</p> <p>Members of the Advisory Committee have been independently interviewed from the management for the purposes of this ASI-PS Certification Audit.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The operation of the Advisory Committee is enshrined in a reference manual (confidential document). Minutes from the meetings of this committee are all made accessible to employees via an internal diffusion through the Portal (the Intranet site for the Entity's employees).</p> <p>All collective bargaining processes are implemented through the Advisory Committee.</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	<p>The Entity does not operate in a country where applicable law restricts the right to freedom of association and collective bargaining.</p> <p>Entity's workers aren't associated with a union but rather negotiate their working conditions through an Advisory Committee.</p>
10.2a Child Labour (minimum age)	Conformance	<p>The Entity has demonstrated not to engage in nor support child labour. The basic minimum age to work for the Entity is 18 years old. All student jobs or internships are paid, and a basic training or mentoring program is offered to all new temporary employees.</p> <p>Considering the above as well as the laws and regulations applicable to the Province of Québec</p>

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		and Canada in terms of labour law, the risk of using or supporting child labour is thus significantly attenuated.
10.2b Child Labour (hazardous)	Conformance	<p>The Entity has demonstrated not to engage in nor support child labour. The basic minimum age to work for the Entity is 18 years old. All student jobs or internships are paid, and a basic training or mentoring program is offered to all new temporary employees.</p> <p>Considering the above as well as the laws and regulations applicable to the Province of Québec and Canada in terms of labour law, the risk of using or supporting child labour is thus significantly attenuated.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Entity has demonstrated not to engage in nor support child labour. The basic minimum age to work for the Entity is 18 years old. All student jobs or internships are paid, and a basic training or mentoring program is offered to all new temporary employees.</p> <p>Considering the above as well as the laws and regulations applicable to the Province of Québec and Canada in terms of labour law, the risk of using or supporting child labour is thus significantly attenuated.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity implements human resources best practices. There is no forced labour in the Entity and no human trafficking. Forced labour and human trafficking are strictly forbidden in the Province of Québec and in Canada.</p> <p>The Entity has demonstrated not to engage in nor support the use of forced labour. Several procedures have been developed by the Human Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Québec and from Canada.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity has demonstrated that it does not require any form of deposit, recruitment fee or equipment advance, thus meeting the criterion.</p> <p>The Entity has demonstrated not to engage in nor support the use of forced labour. Several procedures have been developed by the Human</p>

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		<p>Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Québec and from Canada.</p>
<p>10.3c Forced Labour (migrant workers)</p>	<p>Conformance</p>	<p>The Entity has demonstrated its ability to meet this criterion as it does not require any form lodging deposit or security payment.</p> <p>The Entity has demonstrated not to engage in nor support the use of forced labour. Several procedures have been developed by the Human Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Québec and from Canada.</p>
<p>10.3d Forced Labour (debt bondage)</p>	<p>Conformance</p>	<p>The Entity has demonstrated not to engage in, nor support the use of forced labour, including holding workers in debt bondage or forcing them to work in order to pay off a debt.</p> <p>The Entity has demonstrated not to engage in nor support the use of forced labour. Several procedures have been developed by the Human Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Québec and from Canada.</p>
<p>10.3e Forced Labour (freedom of movement)</p>	<p>Conformance</p>	<p>The Entity does not unreasonably restrict the freedom of movement of workers and there is no on-site housing.</p> <p>The Entity has demonstrated not to engage in nor support the use of forced labour. Several procedures have been developed by the Human Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Québec and from Canada.</p>
<p>10.3f Forced Labour (retention of identity papers, permits, certificates)</p>	<p>Conformance</p>	<p>The Entity does not take any original identity paper, work permit, travel document or training certificates. All personal human resources files remain accessible to the concerned employee during opening hours and are comprised of reproductions or photocopies of employees documents.</p> <p>The Entity has demonstrated not to engage in nor support the use of forced labour. Several</p>

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		<p>procedures have been developed by the Human Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Québec and from Canada.</p>
<p>10.3g Forced Labour (freedom to terminate employment)</p>	<p>Conformance</p>	<p>The employees have the freedom to terminate their employment within the legal frame of the Province of Québec and Canada legislation. The Entity has demonstrated not to engage in nor support the use of forced labour.</p> <p>The Entity has demonstrated not to engage in nor support the use of forced labour. Several procedures have been developed by the Human Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Québec and from Canada.</p>
<p>10.4 Non-Discrimination</p>	<p>Conformance</p>	<p>The evidence suggests that the Entity puts diligent efforts not to engage in nor support discrimination, in any type or form, in ways appropriate to its circumstances.</p> <p>Those efforts include, amongst others: the implementation of a respectful workplace policy, a procedure for behaviour management, the setup of an Advisory Committee, as well as the code of conduct of business by the Entity's employees. The Entity also applies the prescribed provincial labour work standards in its hiring processes.</p>
<p>10.5 Communication and engagement</p>	<p>Conformance</p>	<p>The Entity ensures open communication and direct engagement with workers for work related conditions, and that, through different communication platforms.</p>
<p>10.6 Disciplinary practices</p>	<p>Conformance</p>	<p>The Entity neither engages in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers.</p> <p>Indeed, the Entity's disciplinary practices are framed around the legally established standards regarding labour rights, and follow the logic of gradation. The risks of mental coercion are managed through a set of tools that include, among others: the implementation of a respectful workplace policy, a procedure for behaviour</p>

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		management, the setup of an Advisory Committee, as well as the Code of conduct of business by the Entity's employees.
10.7a Remuneration (living wage)	Conformance	The Entity has demonstrated that it appropriately remunerates workers. To ensure it, a salary survey is conducted annually with the help of an external firm, and results are communicated to employees.
10.7b Remuneration (method of payment)	Conformance	Payments are timely, on a weekly basis, in legal tender and fully documented through electronic support.
10.8 Working Time	Conformance	<p>The Entity complies with applicable law and industry standards on working time (including overtime), public holidays and paid annual leave.</p> <p>Annual leave (vacation time) policies are clear and formally documented. Vacation time is granted fairly and equitably.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>An Occupational Health and Safety (OHS) Policy is in place and was reviewed and signed by the President & Chief Executive Officer.</p> <p>The Policy supports the mission of the organization to achieve a strong safety culture and is periodically reviewed.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Occupational Health and Safety Policy (OHS) is presented to all new workers, as part of the induction process. All visitors and contractor's employees are exposed to the key-objectives of the OHS Policy. The Policy is posted in different areas of the plant and available on the intranet.</p> <p>The application of the OHS Policy for employers, contractors and visitors is in conformity with the Entity's OHSAS 18001 standard certification.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>The OHS Policy includes a commitment to the prevention of accidents and to comply with applicable legal requirements.</p> <p>Audit programs are conducted on a continual basis to ensure compliance.</p> <p>The Entity and all workers, visitors and contractors share the responsibility of their own health and</p>

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		safety and the responsibility for the health and safety of co-workers too.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Occupational Health and Safety (OHS) Policy refers to the right of workers to participate in accident prevention and the safe practices for their work. The specific details of the duty to refuse or stop any unsafe work is defined in an internal procedure. The risk management and the right to refuse or stop unsafe work processes respect the OHSAS 18001 requirements.
11.2 OH&S Management System	Conformance	<p>Based on the provided objective evidence, we conclude to the implementation of the following elements:</p> <p>~ An Occupational Health and safety (OHS) Management System, certified to the OHSAS 18001:2007 standard is implemented. The Entity performs internal audits on a continuous basis.</p> <p>~ The Entity's valid OHSAS 18001 certificate can be viewed at: https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=&noCertificat=53320-3-01</p>
11.3 Employee engagement on health and safety	Conformance	<p>The evidence suggests that workers have access to a Central Joint Occupational Health and Safety (OHS) Committee is in place and supported by joint Sectorial Committees. The committees meet about ten times a year and minutes of the meeting are taken and posted on billboards and on the intranet.</p> <p>Different means are available for the workers to provide suggestions and improvements such as pre-shift meeting, workplace inspections or projects approval.</p>
11.4 OH&S performance	Conformance	<p>The multiple OHS Key Performance Indicators (KPI . results oriented and proactive) are strictly monitored and compared with peers or best practices. The Entity strives for continuous improvement in OHS performance.</p> <p>Various statistics and OHS reports are internally published to support continuous improvement.</p>

Document Control and Version History

Revision	Date	Notes
0	13 July 2020	Issued (Initial certification audit)