

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CONSTELLUM NEUF-BRISACH

CERTIFICATE
NUMBER

83

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

26 JUNE 2020

DATE OF EXPIRY

25 JUNE 2021

CERTIFIED SINCE

26 JUNE 2020

AUTHORISED BY

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

CERTIFICATION SCOPE

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

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	Constellium Neuf-Brisach
CERTIFICATION SCOPE	Casting, rolling, finishing and recycling facilities of Constellium Neuf-Brisach site (France).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">First Certification Audit
AUDIT FIRM	GUTcert (ANFOR Group)
AUDIT DATE	<ul style="list-style-type: none">27 . 29 May 2020
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">13 June 2020
AUDIT SCOPE	<p>The audit scope covered: Complete site of Constellium Neuf-Brisach site (France), including casting, rolling, finishing and recycling facilities.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p>At the time of the audit, access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a desktop exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>

AUDIT OUTCOME	<ul style="list-style-type: none"> Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. <input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. <input checked="" type="checkbox"/> 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. <input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	26 June 2020 - 25 June 2021
NEXT AUDIT TYPE	Surveillance audit
NEXT AUDIT DUE DATE	25 December 2020
CERTIFICATE NUMBER	83

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented systems and procedures for legal watch and ensure compliance with Law applicable. Corporate supports the Entity with legal council. Employees awareness on legal topics is raised through communication and training.
1.2 Anti-Corruption	Conformance	Consistent with French law and prevailing international standards, the Entity has implemented several processes, procedures to work against corruption. Notable amongst those are: codes of conduct widely communicated, a risk assessment, trainings, whistleblowing mechanisms, internal and external controls. The corporation reports periodically on anti-corruption in its annual sustainability report, that can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports
1.3 Code of Conduct	Conformance	Entity's Headquarters has implemented a worldwide code of conduct including principles relevant to environmental, social and governance performance that can be found via the following link https://www.constellium.com/sustainability/downloads/policies-codes-conduct On the Neuf-Brisach Plant, the Code of Conduct is effectively implemented and communicated to the interested parties.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented and maintains policies, at Corporate and/or local level, consistent with the environmental, social and governance practices included in the ASI Performance Standard. Main Corporate policies can be found via the following link https://www.constellium.com/sustainability/downloads/policies-codes-conduct .
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has senior management endorsement and support through provision of resources. Policies are endorsed by senior management and regularly reviewed.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity communicates the policies internally and externally (on the company website and intranet). The supplier code of conduct is also actively communicated to the suppliers.
2.2 Leadership	Conformance	The Entity's plant manager has the overall responsibility and authority for ensuring conformance with ASI Standard and to ensure sufficient resources to support its implementation. He is supported by his local team as well as by the corporate sustainability team.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an environmental management system according to ISO 14001 and an energy management system according to ISO 50001. These systems are certified by an accredited certification body.
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has documented and implemented a management system on social aspects. It is not certified but appears correctly implemented during the audit.</p> <p>For health and safety aspects, the Entity has documented and implemented a specific management system according to OHSAS 18001. This system is certified by an accredited certification body.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented a responsible sourcing Policy covering environmental, social and governance issues. It includes, in particular, signature of the Supplier Code of Conduct, supplier mapping and due diligence procedures. The responsible sourcing Policy can be found via the following link</p> <p>https://www.constellium.com/sustainability/downloads/policies-codes-conduct</p>
2.5 Impact Assessments	Conformance	<p>The Entity has implemented processes to perform environmental, social, cultural and Human Rights Impact Assessments for new projects or major changes. Consultation with internal and external stakeholders is included.</p> <p>The site is located in a highly regulated country (France), where major projects and changes must undergo a thorough analysis and authorization process.</p>

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	The Entity has developed its site specific emergency response plans (internal operational plan, continuity plans) in collaboration with potentially affected stakeholders. Regular drills are performed.
2.7 Mergers and Acquisitions	Conformance	Mergers & acquisitions are not managed at local level but by corporate headquarters. In a merger or acquisition case, an environmental, social and governance due diligence process is activated according to a Corporate process.
2.8 Closure, Decommissioning and Divestment	Conformance	Closure, decommissioning and divestments are not managed on local level but by corporate headquarter. In this case, an environmental, social and governance due diligence process is activated.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity publicly discloses its governance approach and its material environmental, social and economic impacts at Corporate level, through Business and Sustainability performance reports in line with GRI (Global Reporting Initiative) guidelines, that can be found via the following link:</p> <p>https://www.constellium.com/sustainability/downloads/brochures-reports</p> <p>These reports are verified by third-party auditors.</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law, at corporate level in the Business and sustainability performance report. The last report of 2018 mentions that there was no major and significant non-compliance issue during this year for the whole corporation. A copy of the latest sustainability report can be found via the following link:</p> <p>https://www.constellium.com/sustainability/downloads/brochures-reports (See GRI 205-3, 307-1, 406-1, 416-2, 419-1 in the GRI part of the report).</p>
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented policies, procedures and processes related to payments to governments. This topic is covered by the Code of Conduct. Only legal and obligatory payments related to taxes and duties

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		are paid. SOX (Sarbanes-Oxley) rules are applied to ensure the transparency of payments to governments. Periodic audits are conducted. No issues are identified.
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	Unable to Rate	The Entity has implemented various accessible, transparent, understandable, culturally and gender sensitive channels to address stakeholder complaints, grievances and requests, especially the work council, a site committee with external stakeholders, a hotline, the website etc. However, due to the coronavirus context, it was not possible to interview internal and external stakeholders. Thus, even if the Entity practices seem sound, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity's Headquarters has evaluated the environmental life cycle impacts of the main product lines of the Neuf-Brisach plant. These assessments have been externally verified and will be updated. A copy of the current LCA summaries can be found via the following link: https://www.constellium.com/sustainability/life-cycle-assessments .
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has defined and implemented procedures to provide adequate cradle-to-gate Life Cycle Assessment (LCA) information on its Aluminium products, upon customer request. A copy of the current LCA summaries can be found via the following link: https://www.constellium.com/sustainability/life-cycle-assessments .
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	When communicating externally on Life Cycle Assessment (LCA) information, the Entity communicates through its Headquarters or the website, with the adequate assumptions and boundaries. Upon request, the critical review report of the full LCA study is also sent. A copy

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		of the current LCA summaries can be found via the following link: https://www.constellium.com/sustainability/life-cycle-assessments .
4.2 Product design	Conformance	During a new product development, desired by customers, sustainability checks are performed. It integrates clear sustainable performance assessments on main impacts (energy, climate, waste, resources, social, health and safety) and objectives.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has implemented a process to minimize aluminium process scrap and it has been minimized the last years. 100% of scrap is recycled internally.
4.3b Aluminium Process Scrap (alloy separation)	Unable to Rate	The Entity has implemented various procedures to segregate internal scrap for recycling. This has been verified through interview and documents. However, due to the coronavirus context, it was not possible to perform a site tour to check the segregation. Thus, even if the Entity practices seem sounds, the criteria was assessed as Unable to Rate until Site tour can be performed. This site tour is already planned in the months to come.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity recycles products at end-of-life from its customers. The Entity's Headquarters also has a consistent and detailed recycling strategy, including specific timelines, activities and targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity's Headquarters engage with collection and recycling systems at various levels to support recycling of products at end of life and raise awareness on recycling. For instance, the Entity is member of the Recycling division of the European Aluminium Association, of France Aluminium recycling and participates in the "Every can counts" program.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity publicly discloses on a yearly basis, at corporate level, GHG emissions and energy use by source in the Business and Sustainability Performance Report and in the CDP (Carbon Disclosure Project) answer. All documents are available on Constellium website, via the

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		following link: https://www.constellium.com/sustainability/downloads/disclosure-and-certifications .
5.2 GHG emissions reductions	Conformance	The Entity's Headquarters has published a corporate time-bound greenhouse gas emissions reduction target in its sustainable report, available via https://www.constellium.com/sustainability/sustainability-core-our-business . The Entity publicly discloses its time-bound greenhouse gas emissions target on its website, available via the following link: https://www.constellium.com/neuf-brisach-france-aluminium-manufacturing-plant-constellium . It addresses both direct and indirect emissions. It was retraced that both targets are related and consistent.
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity monitors and publishes, at corporate level, its key emissions to air in its yearly Business and Sustainability Performance Report, that can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports see p63 GRI 305-7) For Neuf-Brisach plant, emissions to the air are under tight control according to local regulations and permits. Plans are implemented to reduce their impacts.
6.2 Discharges to Water	Conformance	The Entity monitors and publishes, at corporate level, its key discharges to water in its yearly Business and Sustainability Performance Report, that can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports (see p63 GRI 306-1) For Neuf-Brisach plant, discharges to water are under tight control according to local regulations and permits. Plans are implemented to reduce their impacts.

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6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity conducts regular assessment of the major risks of spills and leakage through various risk analysis, checked by the French Authority and/or covered by the ISO 14001 certification.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented a management system, including emergency, monitoring and communication procedures, to deal with the major risks of spills and leakage. This system is regularly inspected by the French Authority.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented procedures to disclose significant spills to affected parties, immediately after an incident.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publicly reports, at corporate level, significant spills yearly in the Business and sustainability report, that can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports (see p68 GRI 306-3) No event to report for the plant.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy according to the Waste Mitigation Hierarchy, at corporate and local level. A corporate target is defined to reduce landfilling. Waste management is included within the ISO 14001 certified management system.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity discloses, at corporate level, its hazardous and non-hazardous waste quantities and disposal methods in its annual sustainability report. A copy of the latest sustainability report can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports (see p47 and 64).
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

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6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8a Dross (recovery)	Conformance	The Entity has implemented processes to maximise the recovery of aluminium by treatment of dross and dross residues. 100% of the dross is gathered, segregated per alloy group and recycled internally or externally. No dross is landfilled.
6.8b Dross (recycling)	Conformance	The Entity has implemented processes to maximise the recycling of treated dross residues. Actually, all dross residues are recycled internally or externally. There is no landfilling.
6.8c Dross (review of alternatives)	Conformance	The Entity recycles internally and externally all dross residues. We could verified that there is no landfilling.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and monitors its water withdrawal and use by source and type. Main withdrawal is groundwater for process cooling water.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed the current and forecast water-related risks within its Area of Influence (limited to the plant area). The assessment shows a low risk level regarding water.
7.2a Water management (management plans)	Not Applicable	This criterion has been rated as not applicable due to the low risk level identified in the risk assessment performed by the Entity.

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Not Applicable	This criterion has been rated as not applicable due to the low risk level identified in the risk assessment performed by the Entity.
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity discloses, at corporate level, its water withdrawals and uses in its 2018 annual sustainability report that can be found via the following link: https://www.constellium.com/sustainability/downloads/brochures-reports (p.63 and 68 GRI-303-3).</p> <p>The Entity discloses its material water-related risks within the Carbon Disclosure Project (CDP) water assessment that can be found via the following link: https://www.constellium.com/sustainability/downloads/disclosure-and-certifications</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity has assessed the risk and materiality of the impacts on biodiversity, within its Area of Influence (limited to the plant area including the 110ha forest.</p> <p>The assessment shows a low risk level regarding biodiversity. Main biodiversity topic is the forest and its fauna, which is under a forest management plan with a public entity.</p>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This criterion has been rated as not applicable due to the low risk level identified in the risk assessment performed by the Entity.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This criterion has been rated as not applicable due to the low risk level identified in the risk assessment performed by the Entity.
8.2c Biodiversity management (reporting)	Not Applicable	This criterion has been rated as not applicable due to the low risk level identified in the risk assessment performed by the Entity.
8.3 Alien Species	Conformance	The Entity takes preventive actions (such as transportation instructions) to avoid the accidental or deliberate introduction of alien species that could have significant adverse impacts on biodiversity.
8.4a Commitment to No Go-in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

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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	The Entity has defined and communicated a Human Rights and labor practices Policy and also a commitment to respect of Human Rights within its Code of Conduct. They both can be found at the following link : https://www.constellium.com/sustainability/downloads/policies-codes-conduct
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Human Rights Due Diligence process through corporate and local risk assessments. Specific due diligences are performed regarding suppliers and contractors, according to the responsible sourcing program.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has not caused or contributed recently to adverse human rights impacts. In the event, the Entity has implemented processes to cooperate in the remediation through legitimate processes.
9.2 Women's Rights	Unable to Rate	The Entity has implemented Policies and processes to ensure respect for the rights and interests of women, consistent with international standards. A specific improvement program is ongoing at corporate level and at the Neuf-Brisach plant. However, due to the coronavirus context, it was not possible to interview stakeholders. Thus, even if the Entity practices seem sound, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.
9.3 Indigenous Peoples	Not Applicable	There are no indigenous people present in the area (Alsace region of France).
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no indigenous people present in the area (Alsace region of France).

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9.5 Cultural and sacred heritage	Not Applicable	The Entity is not located in any protected area around sacred or cultural heritage sites.
9.6a Resettlements (avoid or minimise)	Not Applicable	There are no resettlements being considered or taking place during the period since joining ASI or expected to occur during the certification period.
9.6b Resettlements (where unavoidable)	Not Applicable	There are no resettlements being considered or taking place during the period since joining ASI or expected to occur during the certification period.
9.7a Local Communities (rights and interests)	Unable to Rate	<p>The Entity is committed to respect the legal and customary rights and interests of local communities. According to the due diligence process, there is no rural/remote community dependent upon resources that may be affected by the Entity's operations.</p> <p>However, due to the coronavirus context, it was not possible to interview internal and external stakeholders. Thus, even if the Entity practices seem sound, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.</p>
9.7b Local Communities (impacts)	Unable to Rate	<p>According to the due diligence process, there is no rural/remote community dependent upon resources that may be affected by the Entity's operations. However, the Entity has implemented processes to prevent and address any adverse impacts on local Community livelihoods resulting from its activities. A site Committee with representatives of local communities takes place periodically. There is no recent complaint.</p> <p>However, due to the coronavirus context, it was not possible to interview internal and external stakeholders. Thus, even if the Entity practices seem sound, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity's activity creates direct and indirect jobs locally.</p> <p>The Entity has a proactive approach of working with local communities and neighbourhood</p>

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		organizations to improve and support mutual interests, through for instance participations to local events and donations to schools and hospitals.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has a strong policy to not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. Risks assessments of suppliers are performed. Public disclosure of the absence of exposure, through the Responsible Minerals Initiative, is available at https://www.constellium.com/sustainability/downloads/disclosure-and-certifications
9.9 Security practice	Conformance	The Entity respects Human Rights in line with good practices in its security practices. The Entity facility uses the services of an external security provider. Security guards are unarmed and trained. No specific risks related to security practices are identified in the provider's assessment. There is no known human rights violation caused by the security service, on the facility.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of workers to associate freely in Labour Unions at Corporate and plant level. A specific agreement with Labour Unions exists at Neuf-Brisach. The Worker council (Conseil social et économique) is freely elected.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to collective bargaining. A specific agreement with Labour Unions exists at Neuf-Brisach.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This criterion of the ASI Performance Standard is not applicable to the Entity, as the right to freedom of association and collective bargaining is not restricted in France.
10.2a Child Labour (minimum age)	Conformance	The Corporate Entity strictly prohibits child labour that is not in accordance with the conventions of the International Labour. At Neuf-Brisach plant, minimum working age is 18. There is in fact no employment of workers under 18 on the facility. Regarding suppliers, a due diligence process about child labour is also implemented.

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10.2b Child Labour (hazardous)	Conformance	<p>The Corporate Entity strictly prohibits child labour that is not in accordance with the conventions of the International Labour.</p> <p>At Neuf-Brisach plant, minimum working age is 18. There is in fact no employment of workers under 18 on the facility.</p> <p>Regarding suppliers, a due diligence process about child labour is also implemented.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Corporate Entity strictly prohibits child labour that is not in accordance with the conventions of the International Labour.</p> <p>At Neuf-Brisach plant, minimum working age is 18. There is in fact no employment of workers under 18 on the facility.</p> <p>Regarding suppliers, a due diligence process about child labour is also implemented.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>There is no requirement in any labour agreement, employee handbook or agreement with a recruiting firm that requires the employees to pay any type of fee or advance.</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>There is no requirement in any labour agreement, employee handbook or agreement with a recruiting firm that requires workers (migrant or no) to lodge deposits or security payments at any time.</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>There is no practice of debt bondage.</p>

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>At Neuf-Brisach plant, workers are free to leave their working places.</p>
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>At Neuf-Brisach plant, no original copies of workers' identity papers, work permits, travel documents or training certificates are held.</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>The Entity has a Human Rights and labor practices policy and a supplier code of conduct that strictly prohibit forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>At Neuf-Brisach plant, conditions of termination of working contracts are defined by French law, collective bargaining agreements and described in personal worker contracts.</p>
10.4 Non-Discrimination	Unable to Rate	<p>The Entity has documented its commitment to equal opportunities and zero tolerance to discrimination in its code of conduct that can be found via the following link https://www.constellium.com/sustainability/downloads/policies-codes-conduct.</p> <p>At Constellium Neuf-Brisach plant, the commitment to equal opportunities and no discrimination is recalled and communicated. No recent case of discrimination brought to the French labour justice.</p> <p>However, due to the coronavirus context, it was not possible to interview stakeholders. Thus, even if the Entity practices seem sounds, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.</p>
10.5 Communication and engagement	Unable to Rate	<p>The Entity has an open and inclusive communication process between management, workers and unions. It allows to raise concerns, report non-conformities and to suggest improvements</p>

CRITERION	RATING	COMMENT
		However, due to the coronavirus context, it was not possible to interview internal and external stakeholders. Thus, even if the Entity practices seem sounds, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.
10.6 Disciplinary practices	Unable to Rate	<p>The Entity prohibits the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers.</p> <p>The rules for disciplinary practices are documented and communicated to workers, in accordance with French law.</p> <p>However, due to the coronavirus context, it was not possible to interview internal and external stakeholders. Thus, even if the Entity practices seem sounds, the criteria was assessed as Unable to Rate until interviews with stakeholders can be performed. These interviews are already planned in the months to come.</p>
10.7a Remuneration (living wage)	Conformance	The Entity pays wages according to French regulations and agreements with Labor Unions. These wages exceed the legal or industry minimum standard.
10.7b Remuneration (method of payment)	Conformance	At Neuf-Brisach Plant, payments of wages are conducted monthly in a punctual manner. All workers are getting payslips with payments details.
10.8 Working Time	Conformance	The Entity complies with French applicable Law and the local collective agreement of the metal industry on working Time, overtime working hours, public holidays and paid annual leave. An agreement concerning shorter working hours also exists, in accordance with French Law.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has an occupational health and safety policy and management system certified OHSAS 18001:2007 by an accredited certification body.</p> <p>The Entity has implemented and communicated its OHS policy, with strong leadership of top management.</p>

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has an occupational health and safety policy and management system certified OHSAS 18001:2007 by an accredited certification body. This system applies to all workers and visitors present in any area or activity under its control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has an occupational health and safety policy and management system certified OHSAS 18001:2007 by an accredited certification body. A commitment to comply with OHS standards and regulations is documented in the Entity's health and safety Policy.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has an occupational health and safety policy and management system certified OHSAS 18001:2007 by an accredited certification body. Worker's right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work is included in the Entity's health and safety Policy and its "Règlement intérieur" (Internal Rules).
11.2 OH&S Management System	Conformance	The Entity has an occupational health and safety management system certified OHSAS 18001:2007 by an accredited certification body.
11.3 Employee engagement on health and safety	Conformance	The Entity has an occupational health and safety management system certified OHSAS 18001:2007 by an accredited certification body. The Entity provides workers with various mechanisms to discuss and participate in the resolution of Occupational Health and Safety issues with management and in particular a joint health and safety committee.
11.4 OH&S performance	Conformance	The Entity has an occupational health and safety management system certified OHSAS 18001:2007 by an accredited certification body. The Entity evaluates its OHS performance through various lagging and leading indicators.

Document Control and Version History

Revision	Date	Notes
0	26 June 2020	Issued (Initial certification audit)