
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**ALVANCE
ALUMINIUM
DUNKERQUE**

CERTIFICATE
NUMBER

88

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

CERTIFICATION

ASI ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

3 AUGUST 2020

DATE OF EXPIRY

2 AUGUST 2023

CERTIFIED SINCE

3 AUGUST 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a light green background.

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

CERTIFICATION SCOPE

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

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

| | |
|-------------------------------|---|
| MEMBER NAME | ALVANCE Aluminium Dunkerque |
| ENTITY NAME | ALVANCE Aluminium Dunkerque |
| CERTIFICATION SCOPE | The production and sale of aluminium by electrolysis of alumina in the form of rolling slabs and ingots for remelting at Aluminium Dunkerque site. |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none">Aluminium SmeltingCasthouses |
| 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 (AFNOR Group) |
| AUDIT DATE | <ul style="list-style-type: none">23 . 25 June 2020 |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">9 July 2020 |
| AUDIT SCOPE | <p>The audit scope covered the Alvance Aluminium Dunkerque facility including the smelter and the casthouse based in Dunkerque. The production and sale of aluminium by electrolysis of alumina in the form of rolling slabs and ingots for remelting at Dunkerque site.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingCasthouses <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> |
| AUDIT OUTCOME | <ul style="list-style-type: none">Certification |
| AUDIT METHODOLOGY DECLARATION | <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. |

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- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 3 August 2020 - 2 August 2023

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 2 February 2022

CERTIFICATE NUMBER 88

SUMMARY OF FINDINGS

| CRITERION | RATING | COMMENT |
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| PRINCIPLE 1 BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | The Entity has implemented procedures for legal watch and ensure compliance with Applicable Law. Employees awareness on legal topics is raised through communication and training. |
| 1.2 Anti-Corruption | Minor Non-Conformance | Until 2018, before its acquisition, the Entity had several procedures and processes to work against corruption consistently with Applicable Law and international standards. The Entity is now re-establishing its own processes and procedures. The Entity has recorded no recent corruption incident. However, to date, these anti-corruption processes and procedures remain incomplete. |
| 1.3 Code of Conduct | Minor Non-Conformance | The Code of Conduct including principles relevant to environmental, social and governance performance is available on the website at the following link: https://www.aluminiumdunkerque.fr/code-de-conduite/ However it has not yet been communicated internally and directly to contractors. |
| PRINCIPLE 2 POLICY & MANAGEMENT | | |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | The Entity has developed and maintains a policy and a Code of Conduct consistent with the environmental, social and governance practices of the ASI standard. They can be found at the following links: - Policy : https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque/ - Code of Conduct : https://www.aluminiumdunkerque.fr/code-de-conduite/ |
| 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. |
| 2.1c Environmental, Social, and Governance Policy (communication) | Minor Non-Conformance | The Policy is communicated internally and externally. It is available on the website at the following link: |

| CRITERION | RATING | COMMENT |
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| | | <p>https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque/</p> <p>The Code of Conduct is available on the website at the following link:</p> <p>https://www.aluminiumdunkerque.fr/code-de-conduite/</p> <p>However it has not yet been communicated internally and directly to contractors.</p> |
| 2.2 Leadership | Conformance | The commercial manager and member of the steering committee, has been nominated ASI management representative by the plant manager. He has the responsibility and authority for ensuring conformance with the ASI standard. |
| 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) | Minor Non-Conformance | The Entity has documented and implemented a Social Management System. The system is not certified but contains the main components of a system consistent with international standards. However, the review into the effectiveness of the social management system has not been completed. |
| 2.4 Responsible Sourcing | Minor Non-Conformance | The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues, including mainly a Purchasing Policy and a Sustainable Procurement Charter available at https://www.aluminiumdunkerque.fr/fournisseurs/ , as well as an internal due diligence process. However to date, the Sustainable Procurement charter has not been yet communicated directly to suppliers (even if available on the website). As a consequence, the regular review of its acceptance and efficiency has not been undertaken. |
| 2.5 Impact Assessments | Conformance | 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. The site is located in a highly regulated country (France), where major projects and changes |

| CRITERION | RATING | COMMENT |
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| | | must undergo a thorough analysis and authorization process. |
| 2.6 Emergency Response Plan | Conformance | <p>As a Seveso High threshold facility, the Entity has implemented a safety management system focused on major hazards and emergency plans, regularly inspected by the authorities. Moreover, the Entity has implemented a certified ISO 14001 environmental management system including emergency preparedness and response.</p> <p>The Entity has developed its site specific emergency response plans in collaboration with potentially affected stakeholders (authorities, workers representatives etc.). This is predominantly an internal operation plan (POI) but also includes other emergency plans. The facility has its own fire and emergency brigade. Regular drills are performed to test the emergency plans, even with external rescue services.</p> |
| 2.7 Mergers and Acquisitions | Conformance | Mergers and acquisitions are not managed at local level but at corporate headquarters. In a merger or acquisition case, an environmental, social and governance due diligence process is activated according to a Corporate process. |
| 2.8 Closure, Decommissioning and Divestment | Conformance | Closure, decommissioning or divestment are not managed at local level but at corporate headquarters. In such a case, an environmental, social and governance review process is activated. |
| PRINCIPLE 3 TRANSPARENCY | | |
| 3.1 Sustainability Reporting | Minor Non-Conformance | <p>The Entity publicly discloses its governance approach and its material environmental, social and economic impacts on its website and especially in its Sustainability Report, that can be found at the following link: https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque/</p> <p>However, some inconsistencies or gaps, mainly attributed to the inconsistency of the process to develop the Report (first edition ever for the current Entity) were identified in the Report.</p> |
| 3.2 Non-compliance and liabilities | Conformance | The Entity publicly discloses that there are no significant fines, judgments, penalties and non-monetary sanctions for failure to comply with |

| CRITERION | RATING | COMMENT |
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| | | Applicable Law, in its sustainability performance report (p 23 and 51) that can be found at the following link: https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque/ |
| 3.3a Payments to governments (legal and contractual) | Conformance | The Entity has developed and implemented a Code of Conduct and processes related to financial transactions, and therefore also to payments to governments. Only legal and obligatory payments related to taxes and duties are paid to governments. No issues were identified during the financial audits. |
| 3.3b Payments to governments (disclosure . bauxite mining) | Not Applicable | This criterion is not applicable to the Entity's Certification Scope. |
| 3.4 Stakeholder complaints, grievances and requests for information | Conformance | 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 and the company website. |
| PRINCIPLE 4 MATERIAL STEWARDSHIP | | |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts) | Minor Non-Conformance | The Entity has evaluated for all its product lines the life cycle impact focusing mainly on the life cycle carbon footprint. However this evaluation is incomplete: absence of the other main environmental criteria, absence of display of the distribution of the various impacts on the different life cycle stages. |
| 4.1b Environmental Life Cycle Assessment (cradle to gate) | Minor Non-Conformance | Upon customer request, the Entity would provide cradle-to-gate Life Cycle carbon footprint of its aluminium products. However, this information is currently incomplete. |
| 4.1c Environmental Life Cycle Assessment (public communication) | Minor Non-Conformance | The Entity communicates the life cycle carbon footprint estimate in its the sustainability report (p41), that can be found at the following link: https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque/ Information is given that this is an estimate based on European Aluminium data. However, the underlying assumptions are not clearly publicly available. |

| CRITERION | RATING | COMMENT |
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| 4.2 Product design | Not Applicable | This criterion is not applicable to the Entity's Certification Scope. |
| 4.3a Aluminium Process Scrap (targets) | Conformance | The Entity has implemented a process to minimize aluminium process scrap. A target is defined and action plans implemented. 100% of the scrap is recycled internally or externally. |
| 4.3b Aluminium Process Scrap (alloy separation) | Conformance | The Entity has implemented a process to segregate scraps by alloys and grades to facilitate recycling. This process includes labelling, inventory in storage register and training of employees. |
| 4.4a Collection and recycling of products at end-of-life (strategy) | Conformance | The Entity has implemented a recycling strategy based on increasing remelt capacity and recycling loops with customers. Currently there is no recycling of downstream products but the Entity has defined ambitious targets with an action plan to reach the recycling of 30 kt aluminium per year within 3 years. |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance | The Entity engages with some regional collection and recycling initiatives regarding circular economy. It also explores partnerships with downstream customers to support recycling. |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS | | |
| 5.1 Disclosure of GHG emissions and energy use | Conformance | The Entity accounts for and publicly discloses its material GHG emissions and energy use, annually, in its sustainability report (p 45 and 59 to 61) that can be found at the following link: https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque/ |
| 5.2 GHG emissions reductions | Minor Non-Conformance | The Entity publishes time-bound GHG emissions reduction targets, in its sustainability report (p 45 and 46) for direct and indirect material GHG emissions. The report can be found at the following link: https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque/ However there is currently no structured action plan to reach the 2024 and 2030 targets. Furthermore the 2024 target is currently unclear. |
| 5.3a Aluminium Smelting (management system) | Conformance | The Entity has implemented an ISO 14001 management system certified by a third party, which incorporates Greenhouse Gases |

| CRITERION | RATING | COMMENT |
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| | | emissions management. Operational control procedures, regular monitoring and audits are implemented to limit direct Greenhouse Gases emissions, especially at the electrolysis. |
| 5.3b Aluminium Smelting (up to and including 2020) | Conformance | The Entity has calculated its scope 1 and 2 GHG emissions from the production of aluminium. The verified result is 2.68 t CO ₂ eq/t Al in 2019, which is below the 8 t CO ₂ eq/t Al requirement. |
| 5.3c Aluminium Smelting (after 2020) | Not Applicable | This criterion is not applicable because the criterion 5.3.b applies. |
| PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE | | |
| 6.1 Emissions to Air | Conformance | The Entity quantifies, monitors and manages its air emissions according to French regulations and its certified ISO 14001 management system. Air emissions are under tight control according to local regulations and permits. Plans are implemented to reduce their impacts. The Entity publishes its air emissions mainly in its yearly Sustainability Report (p39, p45-48), that can be found via the following link: https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque/ |
| 6.2 Discharges to Water | Conformance | The Entity quantifies, monitors and manages its discharges to water according to French regulations and its certified ISO 14001 management system. Discharges to water are under tight control according to local regulations and permits. Plans are implemented to reduce their impacts. The Entity publishes its discharges to water mainly in its yearly Sustainability Report (p44), that can be found via the following link: https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque/ |
| 6.3a Assessment and Management of Spills and Leakage (assessment) | Conformance | The Entity conducts periodic assessment of the major risks of spills and leakage through various risk analysis, which is reviewed 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 manage major |

| CRITERION | RATING | COMMENT |
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| | | risks of spills and leakage. This system is regularly inspected by the French Authority and is ISO 14001 certified. |
| 6.4a Reporting of Spills (immediate disclosure) | Conformance | The Entity has implemented procedures to disclose the volume, type and potential impact of significant spills immediately after an incident. There has been no significant spill since the member joined ASI. |
| 6.4b Reporting of Spills (regular reporting) | Conformance | The Entity has implemented a process to publicly disclose significant incidents (including spills), impact assessments and remediation actions taken, in its yearly sustainability report that can be found via the following link: https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque/ There has been no significant spill since the member joined ASI. |
| 6.5a Waste management and reporting (strategy) | Conformance | The Entity seeks to optimise processes for the recovery and recycling of carbon and refractory materials from SPL, which are reinforced by internal processes. The Entity is also looking for alternatives to improve its recovery rate of SPL, which includes the development of an action plan. |
| 6.5b Waste management and reporting (disclosure) | Conformance | The Entity discloses its hazardous/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 p49 and 50). |
| 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. |

| CRITERION | RATING | COMMENT |
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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) | Conformance | All Spent Pot Lining is stored internally in a building with retention, compliant with the Entity's permit. |
| 6.7b Spent Pot Lining (SPL) (recovery and recycling) | Conformance | The Entity seeks to optimise processes for the recovery and recycling of carbon and refractory materials from SPL. Internal processes are implemented to that end. The Entity is also looking for alternatives to improve its recovery rate of SPL, which includes the development of an action plan.. |
| 6.7c Spent Pot Lining (SPL) (Untreated SPL) | Conformance | The Entity does not landfill untreated Spent Pot Lining. Some Spent Pot Linings are landfilled, after a stabilization treatment performed by the waste contractor. The stabilisation/landfill facilities are authorized by the relevant French authority. |
| 6.7d Spent Pot Lining (SPL) (review of alternatives) | Conformance | The Entity reviews annually the alternative options to landfilling of treated SPL and/or stockpiling of SPL, through its management review. More frequently, alternatives are discussed with contractors. |
| 6.7e Spent Pot Lining (SPL) (marine and aquatic environments) | Conformance | There is no discharge of SPL to marine or aquatic environments. This is confirmed by waste tracking documents. |
| 6.8a Dross (recovery) | Conformance | The Entity seeks to maximise the recovery of Aluminium contained in dross and dross residues, through an internal process and external refiners. An action plan is ongoing to optimize internal process. |
| 6.8b Dross (recycling) | Conformance | The Entity maximises the recycling of treated Dross residues. There is no landfilling of dross residues. All dross residues are recovered. |
| 6.8c Dross (review of alternatives) | Conformance | There is no landfilling of dross residues. All dross residues are recovered. It is confirmed by waste tracking documents. |
| 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 |

| CRITERION | RATING | COMMENT |
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| | | use is industrial back-up water for closed cooling circuit. |
| 7.1b Water assessment (risk assessment) | Conformance | The Entity has assessed the water-related risks within its Area of Influence (i.e. watersheds of the plant area). The assessment shows a medium-high risk level regarding water, consistent with the local authorities having high expectations regarding water. |
| 7.2a Water management (management plans) | Conformance | The Entity has implemented a water management plan with time-bound targets. The main target is the reduction by 20% by 2023 (compared to 2019) of the total water consumption. |
| 7.2b Water management (monitoring) | Conformance | Monitoring of the action plan effectiveness is undertaken monthly via the management committee. |
| 7.3 Disclosure of water usage and risks | Minor Non-Conformance | The Entity publishes its annual water consumption in its Sustainable Development Report (pages 42-43) that can be found at the following link: https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque However, there is no publication of use and material water-related risks. Furthermore, discrepancies were identified during the audit regarding water consumptions published in the report. |
| PRINCIPLE 8 BIODIVERSITY | | |
| 8.1 Biodiversity assessment | Conformance | The Entity has assessed the risk and materiality of the impacts on biodiversity, within its Area of Influence (limited to the plant and the loading dock of the harbour). The assessment defines a low risk level regarding biodiversity. Main biodiversity issues on the facility regard birds and flora. Positive actions were taken regarding the Peregrine Falcons. |
| 8.2a Biodiversity management (biodiversity action plans) | Not Applicable | This criterion was considered not applicable because the Entity has assessed that there is no material impacts on biodiversity due to its operations. |

| CRITERION | RATING | COMMENT |
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| 8.2b Biodiversity management (consultation and mitigation hierarchy) | Not Applicable | This criterion was considered not applicable because the Entity has assessed that there is no material impacts on biodiversity due to its operations. |
| 8.2c Biodiversity management (reporting) | Not Applicable | This criterion was considered not applicable because the Entity has assessed that there is no material impacts on biodiversity due to its operations. |
| 8.3 Alien Species | Conformance | The Entity has assessed a low risk related to alien species. However, the Entity takes preventive actions (such as fumigation) to avoid the accidental or deliberate introduction of alien species that could have significant adverse impacts on biodiversity. |
| 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 | The Entity has established a Code of Conduct, which is available at the following link: https://www.aluminiumdunkerque.fr/code-de-conduite/ It includes commitments to respect Human Rights. |
| 9.1b Human Rights Due Diligence (process) | Minor Non-Conformance | The Entity has implemented a due diligence procedure to assess, prevent, mitigate and account for its current and potential impacts on Human Rights. Various risk assessments, controls, suppliers, reviews and audits are performed. If necessary, a mitigation plan is activated and followed up. However, some documents regarding suppliers' assessment, audits and reviews only address human rights in a very general way and needs to be more explicit. |

| CRITERION | RATING | COMMENT |
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| 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 a procedure to cooperate in the remediation through legitimate processes. |
| 9.2 Women's Rights | Conformance | The Entity has implemented a Code of Conduct and processes to ensure respect for the rights and interests of women, consistent with international standards. There is a strong commitment of management and an ongoing action plan to increase women's presence at the facility. |
| 9.3 Indigenous Peoples | Not Applicable | There are no indigenous people present in the area (North of France). |
| 9.4 Free, Prior, and Informed Consent (FPIC) | Not Applicable | There are no indigenous people present in the area (North of France). |
| 9.5 Cultural and sacred heritage | Conformance | The Entity's plant is not located in any protected area around sacred or cultural heritage sites, according to the Monumentum website and the World Heritage list. |
| 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 | No resettlements are being considered or taking place during the period since joining ASI or expected to occur during the certification period. There are also no indigenous people in the area. |
| 9.7a Local Communities (rights and interests) | Conformance | The Entity is committed to respect the legal and customary rights and interests of local communities. According to the Entity's risk assessment, there is no rural/remote community dependent upon resources that may be affected by the Entity's operations. The Entity has a community engagement approach. Several mechanisms exist to discuss with local communities and their representatives. |
| 9.7b Local Communities (impacts) | Conformance | According to the Entity's risk assessment, there is no rural/remote community dependent upon resources that may be affected by the Entity's operations. |

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| | | However, the Entity has implemented processes to prevent and address any adverse impacts on Local Communities and especially dust emissions. An action plan is ongoing to improve the control of dust emissions and a global monitoring of the complaints is performed by a third-party entity for the whole industrial area. |
| 9.7c Local Communities (livelihoods) | Conformance | The Entity's risk assessment process has not identified issues affecting Local Communities. However, it is important to note that the Entity supports the local communities through creation of direct/indirect jobs and various partnerships. |
| 9.8 Conflict-Affected and High-Risk Areas | Conformance | The Entity has implemented a due diligence process to perform a regular assessment of suppliers, primarily based on their country of origin, using the Coface's country risk assessments. No country with armed conflicts nor high-risk areas were found. The process integrates further reviews should a supplier be marked as medium risk and the assessment is reviewed annually. |
| 9.9 Security practice | Conformance | The Entity has an internal security officer and employs an external private security provider to verify the entries and exits on the site. There are regular verifications that all security staff members hold their national authorisations, and which are up-to-date. The security provider is not armed. |
| 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. A specific company agreement exists on right of association. The Worker council CSE (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 the plant. The Entity participates in good faith to its implementation. |
| 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 Entity strictly prohibits child labour that is not in accordance with law and conventions of |

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| | | <p>the International Labour, as documented in its Code of conduct.</p> <p>Minimum working age of 15 is globally required but on the facility, the minimum working age is 18.</p> |
| 10.2b Child Labour (hazardous) | Conformance | <p>The Entity strictly prohibits hazardous and worst forms of child labour, as documented in its Code of conduct.</p> <p>At the plant, minimum working age is 18.</p> <p>Regarding suppliers, a due diligence process is implemented.</p> |
| 10.2c Child Labour (worst forms) | Conformance | <p>The Entity strictly prohibits hazardous and worst forms of child labour, as documented in its Code of conduct.</p> <p>At the plant, minimum working age is 18.</p> <p>Regarding suppliers, a due diligence process is implemented.</p> |
| 10.3a Forced Labour (human trafficking) | Conformance | <p>The Entity has a Code of Conduct that strictly prohibits forced labour. Regarding suppliers, a due diligence process regarding forced labour is also implemented.</p> |
| 10.3b Forced Labour (deposits, fees, advances) | Conformance | <p>The Entity has a Code of Conduct that strictly prohibits 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 Code of Conduct that strictly prohibits 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 (either local or migrant) to lodge deposits or security payments at any time.</p> |
| 10.3d Forced Labour (debt bondage) | Conformance | <p>The Entity has a Code of Conduct that strictly prohibits forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented.</p> <p>There is no practice of debt bondage.</p> |

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| 10.3e Forced Labour (freedom of movement) | Conformance | The Entity has a Code of Conduct that strictly prohibits forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented. At the plant, workers are free to leave their working places. |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | The Entity has a Code of Conduct that strictly prohibits forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented. At the plant, no original copies of workers' identity papers, work permits, travel documents or training certificates are held. |
| 10.3g Forced Labour (freedom to terminate employment) | Conformance | The Entity has a Code of Conduct that strictly prohibits forced labour. Regarding suppliers, a due diligence process about forced labour is also implemented. At the plant, conditions of termination of working contracts are defined by French law, collective bargaining agreements and described in personal worker contracts. |
| 10.4 Non-Discrimination | Conformance | The Entity has documented its commitment to equal opportunities and zero tolerance to discrimination in its Code of Conduct, which can be found at the following link: https://www.aluminiumdunkerque.fr/code-de-conduite/ At the plant, the commitment to equal opportunities and no discrimination is recalled and communicated. |
| 10.5 Communication and engagement | Conformance | The Entity has an open and inclusive communication process between management, workers and workers representatives. It allows to raise concerns, to report non-conformities and to suggest improvements. |
| 10.6 Disciplinary practices | Conformance | 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. It is documented in the Code of Conduct. The rules for disciplinary practices are communicated to workers, in accordance with French law. |

| CRITERION | RATING | COMMENT |
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| 10.7a Remuneration (living wage) | Conformance | Wages are defined by French regulations, the chemical collective agreement and company agreements. Wages exceed the legal minimum standard and respect the industry minimum standard. |
| 10.7b Remuneration (method of payment) | Conformance | The Entity makes wage payments according to French regulations, monthly in a punctual manner. All workers receive payslips with payment details. |
| 10.8 Working Time | Conformance | The Entity complies with French Applicable Law and the collective agreement of the chemical industry on working time, overtime working hours, public holidays and paid annual leave. Company agreements regarding working time and shorter working hours also exist. A time management system is implemented to follow up overtime working hours and paid leave. |

PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

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|---|-------------|--|
| 11.1a Occupational Health and Safety (OH&S) Policy (policy) | Conformance | The Entity implements, communicates and periodically reviews its Occupational Health and Safety Policy, with strong leadership of top management. The Policy can be found at the following link: https://www.aluminiumdunkerque.fr/hseg-aluminium-dunkerque/ |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors) | Conformance | The Entity applies its Occupational Health and Safety Policy to all workers and visitors present in any area or activity under its control. A safety induction module is mandatory for all contractors and visitors entering the site. Specific health and safety controls and audits are performed regarding contractors' practices. |
| 11.1c Occupational Health and Safety (OH&S) Policy (Applicable Law and standards) | Conformance | The Entity's Policy includes a commitment to comply with all legal and other requirements. |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work) | Conformance | The Entity's Policy contains a commitment to involve and consult workers on risk prevention and a commitment to protect workers from injuries and occupational illnesses. Understanding of hazards and safe practices are reinforced to workers in the safety induction modules. Worker's authority to refuse or stop unsafe work is documented in the Internal Rules of the plant. |

| CRITERION | RATING | COMMENT |
|---|-----------------------|--|
| 11.2 OH&S Management System | Minor Non-Conformance | The Entity has documented and implemented an Occupational Health and Safety Management System. The system is not certified but contains the main components of a system consistent with international standards. However some components of the system (planning, management review) are not fully consistent. |
| 11.3 Employee engagement on health and safety | Conformance | The Entity provides workers with various mechanisms to discuss and participate in the resolution of Occupational Health and Safety issues with management. In particular a joint health and safety committee for workers and a health and safety committee with main contractors are present on site. |
| 11.4 OH&S performance | Conformance | The Entity evaluates its OH&S performance through various lagging and leading indicators (frequency rate, number of health project etc.). Periodic performance reviews and benchmarking is also performed to strive to assist in continual improvement. |

Document Control and Version History

| Revision | Date | Notes |
|----------|---------------|--------------------------------------|
| 0 | 3 August 2020 | Issued (Initial certification audit) |