

---

# ASI CERTIFICATION PERFORMANCE STANDARD

---



PRESENTED TO

# ALUMINIUM DUNKERQUE

CERTIFICATE  
NUMBER

88

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
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 horizontal line.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

---

CERTIFICATION SCOPE

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

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Aluminium Dunkerque SAS
ENTITY NAME	Aluminium Dunkerque
CERTIFICATION SCOPE	The production and sale of aluminium by electrolysis of alumina in the form of rolling slabs and ingots for remelting at Aluminium Dunkerque (France) site.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (23 – 25 June 2020)</li><li>Surveillance Audit (4 – 6 October 2021)</li></ul>
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none"><li>23 – 25 June 2020 (Initial Certification Audit)</li><li>4 – 6 October 2021 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>9 July 2020 (Initial Certification Audit)</li><li>26 October 2021 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (23 - 25 June 2020)</u></p> <p>The audit scope covered the Alvanco 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"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p>

---

Surveillance Audit (4 - 6 October 2021)

The audit scope covered the Aluminium Dunkerque (France) 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.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouses

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

---

AUDIT  
OUTCOME

- Certification

---

AUDIT  
METHODOLOGY  
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

---

CERTIFICATION  
PERIOD

3 August 2020 ~~to~~ 2 August 2023

---

NEXT AUDIT  
TYPE

Re-Certification Audit

---

NEXT AUDIT  
DUE DATE

2 August 2023

---

CERTIFICATE  
NUMBER

88

---

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented procedures for a legal watch to ensure compliance with Applicable Law.</p> <p>Employees awareness on legal topics is raised through communication and training.</p>
1.2 Anti-Corruption	Minor Non-Conformance	<p>Until 2018, prior to the takeover by Gupta Family Group Alliance, the Entity had several procedures and processes to work against Corruption consistent with Applicable Law and international standards. The Entity is re-establishing its own processes and procedures, through an action plan.</p> <p>Despite observed improvements in 2021, anti-corruption processes and procedures are still incomplete.</p> <p>The Entity has recorded no recent corruption incident.</p>
1.3 Code of Conduct	Conformance	<p>The Code of Conduct including principles relevant to environmental, social and governance performance is available on the website at the following link:</p> <p><a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a></p> <p>It has been widely communicated internally and externally.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has developed and maintains a Policy and a Code of Conduct consistent with the environmental, social and governance practices of the ASI Performance Standard.</p> <p>They are updated and can be found at the following links:</p> <p>Policy: <a href="https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque</a></p> <p>Code of Conduct: <a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a></p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has senior management endorsement and support through provision of resources.</p> <p>Policies are endorsed by senior management and regularly reviewed.</p>

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Policy is communicated internally and externally. It is available on the website at the following link:  <a href="https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque</a></p> <p>The Code of Conduct has been widely communicated internally and externally and is available on the website at the following link:  <a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a></p>
2.2 Leadership	Conformance	<p>The Commercial Manager, and member of the Steering Committee, has been nominated ASI Management Representative by the Plant Manager. This role has the responsibility and authority for ensuring conformance with the ASI Performance Standard.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has documented and implemented an Environmental Management System according to ISO 14001 and an Energy Management System according to ISO 50001. These systems are certified by an accredited certification body.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>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. Since last year, it has been improved especially regarding the review of its effectiveness.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues, including mainly a Purchasing Policy and a Sustainable Procurement Charter, as well as an internal due diligence process.</p> <p>These documents are available at:  <a href="https://www.aluminiumdunkerque.fr/fournisseurs">https://www.aluminiumdunkerque.fr/fournisseurs</a></p> <p>Since last year, improvements have been made regarding communication of the Sustainable Procurement Charter to suppliers and regular review of its acceptance.</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.</p> <p>Consultation with internal and external stakeholders is included.</p> <p>The site is located in a highly regulated country</p>

CRITERION	RATING	COMMENT
		(France), where major projects and changes must undergo a thorough analysis and authorization process.
2.6 Emergency Response Plan	Minor Non-Conformance	<p>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 Entity has its own fire and emergency brigade.</p> <p>However, since the beginning of 2020, no drill has been performed according to the schedule.</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	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:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p> <p>The process to edit this report and the report itself has recently been improved.</p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity publicly discloses that there are no significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law, in its Sustainability Report that can be found at the following link:</p> <p><a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>

CRITERION	RATING	COMMENT
3.3a 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.
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)	Conformance	The Entity has performed a complete Life Cycle Assessment for its main product lines (slabs and ingots).
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	To date, there has been no customer request received. The Entity has defined a process to provide the cradle-to-gate life cycle carbon footprint of its aluminium products upon customer request. .
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity communicates the Life Cycle Assessment in its Sustainability Report, that can be found at the following link: <a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a> Information is clearly given about LCA results, boundaries and underlying assumptions.
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. The Entity targets 100% of scrap for collection, recycling and/or re-use. Actions plans are implemented. Currently, the major part 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.

CRITERION	RATING	COMMENT
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 significant recycling of downstream products. But a new Roadmap is currently being discussed, a target is defined for 2022 and a new mid-term target is being discussed.
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 (pages 23 – 27) that can be found at the following link: <a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a>
5.2 GHG emissions reductions	Conformance	The Entity publishes time-bound GHG emissions reduction targets, in its sustainability report for direct and indirect material GHG emissions. A Roadmap and an action plan are documented. The Sustainability Report (pages 24 -27) can be found at the following link: <a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a>
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 emissions management. Operational control procedures, regular monitoring and audits are implemented to limit direct Greenhouse Gases emissions, especially relating to the electrolysis process.
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 2.38 t CO <sub>2</sub> eq/t Al in 2020, which is below the 8 t CO <sub>2</sub> eq/t Al requirement.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable because Criterion 5.3b 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



CRITERION	RATING	COMMENT
		<p>its certified ISO 14001 Environmental Management System.</p> <p>Air emissions are controlled according to local regulations and permits. Plans are implemented to reduce their impacts. There was a significant reduction of perfluorocarbon (PFC) emissions in 2020-2021.</p> <p>The Entity publishes its air emissions in its annual Sustainability Report (pages 71- 75), that can be found at the following link:  <a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>
6.2 Discharges to Water	Conformance	<p>The Entity quantifies, monitors and manages its discharges to water according to French regulations and its certified ISO 14001 Environmental Management System.</p> <p>Discharges to water are under tight control according to local regulations and permits. Plans are implemented to reduce their impacts. A new strategy to reach compliance is currently being developed.</p> <p>The Entity publishes its discharges to water predominantly in its annual Sustainability Report (page 69), that can be found via the following link:  <a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity conducts periodic assessments of the major risks of Spills and Leakage through various risk analyses, which are reviewed by the French Authority and/or covered by the ISO 14001 certification.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has implemented a management system, including emergency, monitoring and communication procedures, to manage major risks of Spills and Leakage. This system is regularly inspected by the French Authority and is ISO 14001 certified.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has implemented procedures to disclose the volume, type and potential impact of significant Spills immediately after an incident.</p> <p>There has been no significant spill since the member joined ASI.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has implemented a process to publicly disclose significant incidents (including spills), impact assessments and remediation actions</p>

CRITERION	RATING	COMMENT
		<p>taken, in its annual Sustainability Report (page 85), that can be found via the following link: <a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p> <p>There has been no significant spill since the Entity joined ASI.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has implemented a waste management system included within its certified ISO 14001 Management System. Targets are defined. The recovery rate has improved significantly since the last audit.</p> <p>The Entity's waste strategy is in accordance with the Waste Mitigation Hierarchy. Waste management is implemented according to French regulations.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity discloses its Hazardous/Non-Hazardous Waste quantities and disposal methods in its annual Sustainability Report (page 77--78), that can be found via the following link: <a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a></p>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	All Spent Pot Lining is stored internally in a building with appropriate containment facilities which are 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 now implemented to that end and most carbon SPL is now recovered.

CRITERION	RATING	COMMENT
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity does not landfill untreated Spent Pot Lining. Compared to last year, most carbon Spent Pot Lining are now recovered. Some Spent Pot Linings are landfilled, but 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. The main use is for industrial back-up water for its 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 demonstrated 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.

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Conformance	Monitoring of the water action plan effectiveness is undertaken at least monthly via the management committee.
7.3 Disclosure of water usage and risks	Conformance	The Entity publishes its annual water consumption, use and material water-related risks in its Sustainability Report (page 65 – 68), that can be found at the following link: <a href="https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/developpement-durable-aluminium-dunkerque</a>
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 defined a low risk level regarding biodiversity. The main biodiversity issues at the facility relate to birds and flora. Positive management actions have been implemented for Peregrine Falcons and seagulls.
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.
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.

CRITERION	RATING	COMMENT
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: <a href="https://www.aluminiumdunkerque.fr/code-de-conduite/">https://www.aluminiumdunkerque.fr/code-de-conduite/</a> It includes commitments to respect Human Rights.
9.1b Human Rights Due Diligence (process)	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.
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, which is already showing positive results.
9.3 Indigenous Peoples	Not Applicable	There are no Indigenous People present in the area (Northern France).
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	There are no indigenous people present in the area (ern 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.

CRITERION	RATING	COMMENT
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	<p>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.</p> <p>The Entity has a community engagement approach. Several mechanisms exist to discuss with local Communities and their representatives, as concerns are raised.</p>
9.7b Local Communities (impacts)	Conformance	<p>According to the Entity's risk assessment, there is no rural/remote Community dependent upon resources that may be affected by the Entity's operations.</p> <p>However, the Entity has implemented processes to prevent and address any adverse impacts on local Communities and especially dust emissions and one noise issue. A global monitoring of the complaints is performed by a third-party entity for the whole industrial area.</p>
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 the 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 country risk assessment tool). 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 to and exits off site. Regular verifications that all security staff members hold

CRITERION	RATING	COMMENT
		their national authorisations are undertaken, 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 the International Labour Organisation, as documented in its Code of Conduct. Minimum working age of 15 is globally required, but at the Entity, the minimum working age is 18.
10.2b Child Labour (hazardous)	Conformance	The Entity strictly prohibits Hazardous and Worst Forms of Child Labour, as documented in its Code of Conduct. The Entity's minimum working age is 18. Regarding suppliers, a due diligence process is implemented.
10.2c Child Labour (worst forms)	Conformance	The Entity strictly prohibits Hazardous and Worst Forms of Child Labour, as documented in its Code of Conduct. The Entity's minimum working age is 18. Regarding suppliers, a due diligence process is implemented.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has a Code of Conduct that strictly prohibits Forced Labour. Regarding suppliers, a due diligence process regarding Forced Labour is also implemented.
10.3b Forced Labour (deposits, fees, advances)	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.

CRITERION	RATING	COMMENT
		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.
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>
10.3e Forced Labour (freedom of movement)	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>At the 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 Code of Conduct that strictly prohibits Forced Labour. Regarding suppliers, a due diligence process about Forced Labour is also implemented.</p> <p>At the 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 Code of Conduct that strictly prohibits Forced Labour. Regarding suppliers, a due diligence process about Forced Labour is also implemented.</p> <p>At the 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	Conformance	<p>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:  <a href="https://www.aluminiumdunkerque.fr/code-de-conduite">https://www.aluminiumdunkerque.fr/code-de-conduite</a></p>



CRITERION	RATING	COMMENT
		At the plant, the commitment to equal opportunity and non-discrimination is 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.
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 monthly wage payments according to French regulations, 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		
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: <a href="https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque">https://www.aluminiumdunkerque.fr/hseq-aluminium-dunkerque</a>
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

CRITERION	RATING	COMMENT
		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.
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. Some improvements (for example, compliance status) were made this year. However the management review of the OHS system is still not fully consistent regarding some aspects (for example, health management).
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 both present on site.
11.4 OH&S performance	Conformance	The Entity evaluates its OH&S performance through various lagging and leading indicators (frequency rates, number of health projects etc.). Periodic performance reviews and benchmarking of performance is also performed. Improving trends on frequency and severity rates for both 2020 and 2021 were noted.

#### **Document Control and Version History**

Revision	Date	Notes
0	3 August 2020	Issued (Initial Certification Audit)
1	25 November 2021	Surveillance Audit; Update to Member Name and Entity Name to reflect change in ownership of the Entity; Corrected the date of the Initial Certification Audit in the Audit Scope description.