
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

ALUMINERIE ALOUETTE

CERTIFICATE
NUMBER

85

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BNQ

DATE OF ISSUE

13 JULY 2020

DATE OF EXPIRY

12 JULY 2023

CERTIFIED SINCE

13 JULY 2020

AUTHORISED BY

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

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

CERTIFICATION SCOPE

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

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Aluminerie Alouette
ENTITY NAME	Aluminerie Alouette Inc.
CERTIFICATION SCOPE	Aluminium smelter, casthouse and operational activities conducted at Alouette facilities in Canada.
SUPPLY CHAIN ACTIVITIES	<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">Initial Certification Audit (9 – 13 December 2019)Surveillance Audit (20 October – 19 November 2022)
AUDIT FIRM	BNQ
AUDIT DATE	<ul style="list-style-type: none">9 – 13 December 2019 (Initial Certification Audit)20 October – 19 November 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">24 June 2020 (Initial Certification Audit)10 December 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 – 13 December 2019)</u></p> <p>The audit scope covered the operations, maintenance and services required for the production of primary aluminium.</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> <p><u>Surveillance Audit (20 October – 19 November 2022)</u></p> <p>The audit scope covered the operations, maintenance and services required for the production of primary aluminium.</p>

	<p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"> ● Aluminium Smelting ● Casthouses <p>All relevant criteria in the ASI Performance Standard were included in the audit scope. The audit has been undertaken as a combined on-site and 'desktop' exercise due to COVID-19 related restrictions in Québec, Canada.</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. <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	13 July 2020 –12 July 2023
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DUE DATE	12 July 2023
CERTIFICATE NUMBER	85

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has maintained awareness of legal requirements and any changes in the law that may impact it. The Entity's legal review services are provided by several expert firms in the field of forensic accounting and they are mandated to inform the Entity of any change that may affect it, in particular in terms of labour law or taxation. The Entity is also supported by a specialized consultancy when negotiating large-scale special contracts. A financial audit exercise is undertaken quarterly and annually. Legal compliance matters are discussed through the Owners Committee annual meeting as part of a consortium.</p> <p>Annually, representatives from all of the Entity's major departments sign a compliance certificate addressed to the members and alternate members of the Owners Committee. This certificate is a declaration of conformity relating to a plurality of domains such as labour law, fiscal legislation, environmental and Occupational Health and Safety (OHS) legislation.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented various anti-corruption measures, including implementation of two written codes of ethics and conduct: for business partners and for employees. The codes include principles relevant to environmental, social and governance performance, and are available at: https://www.alouette.com/en/our-commitment/governance</p> <p>The Code of Ethics and Business Conduct is presented to every new employee and serves as a good practice guide. This Code is supported by a respectful workplace Policy. The Partner Code of Conduct is communicated to each supplier, either through commercial contract documents or through an awareness letter.</p> <p>A whistleblowing mechanism has been implemented, supported by a neutral and impartial external firm.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented two written codes of ethics and conduct: for business partners and for employees. The codes include principles relevant to environmental, social and governance performance, and are available at: https://www.alouette.com/en/our-commitment/governance</p>

CRITERION	RATING	COMMENT
		The Code of Ethics and Business Conduct is provided to every new employee and serves as a good practice guide. This Code is supported by a respectful workplace Policy. The Partner Code of Conduct is communicated to each supplier, either through commercial contract documents or through an awareness letter.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented organizational practices as well as policies that are consistent with the environmental, social and governance practices included in the ASI Performance Standard. Policies include an Occupational Health and Safety (OHS) Policy, an Environmental Policy, a Responsible Energy Management Policy, a Quality Management Policy, and an Information Security Management Policy.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has environmental, social and governance Policies that are signed and endorsed by the President and CEO which provides resources accordingly.</p> <p>The review and approval of the Policies are carried out by the Executive and Management under a defined frequency. The implementation of Policies and procedures is validated by an audit process (internal and external).</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity communicates its OHS, Environmental, Energy as well as Quality and Information Security Policies internally through their prominent display (physically and electronically), the induction of new employees and contractors, several awareness initiatives (regular meetings) and refresher training opportunities.</p> <p>The Policies are available internally on the employee portal and externally on request via: https://www.alouette.com/en</p>
2.2 Leadership	Conformance	<p>The Management Systems Director is the main contact for ASI correspondence or requests and is the Entity's senior Management Representative having overall responsibility and authority for ensuring conformance with the ASI Performance Standard with the help of the Chief Financial Officer.</p> <p>This role is also supported by an internal ASI Implementation Committee composed of the following representatives: Director – Communication; Director – OHS, Environment and Quality; Senior Advisor –</p>

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		<p>Management Systems; Advisor – Compliance Health, Safety & Environment; Advisor – Human Resources; and Coordinator – Risk management.</p> <p>The Entity also implements a Lean Visual Management project to monitor the implementation of the ASI Performance Standard with the ASI Implementation Committee members.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has implemented, through the integration of various processes and business practices, elements relevant to the management of environmental issues. The Entity's Environmental Management System (EMS) has been certified under the ISO 14001 standard since 2005.</p> <p>The valid ISO 14001 certificate is available at: https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=ALOUETTE&noCertificat=60582-1-01#recherche_rcc_input</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has implemented, through the integration of various processes and business practices, elements relevant to the management of social issues. Social risks are assessed at a broader managerial scale. Periodic surveys are conducted to measure employee satisfaction as well as commitment to work.</p> <p>Occupational Health and Safety (OHS) management of partners, subcontractors and contractors is integrated into the organization's current activities. The Entity has been ISO 14001 and OHSAS 18001 certified since 2005, having transitioned to ISO 45001 in December 2020. Please refer to the valid ISO 45001 certificate at: https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=ALOUETTE&noCertificat=60583-1-01#recherche_rcc_input</p>
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity has implemented a responsible sourcing Policy, which is deployed through a variety of tools including, amongst others: a procedure for managing purchases of goods and services, a suppliers' code of conduct, procurement guidelines established by the Alumina Committee, a supplier audit program and a supplier preselection questionnaire.</p> <p>However, the evidences of Due Diligence relating to the supply of Alumina are not systematically available at the Entity's site since it is the Consortium Owners who directly manage the supply of Alumina.</p>
2.5 Impact Assessments	Conformance	<p>The Entity has demonstrated its ability to conduct environmental, social, cultural and Human Rights</p>

CRITERION	RATING	COMMENT
		Impact Assessments for New Projects or Major Changes to existing facilities. The Impact Assessment studies satisfy the legal requirements since the government authorised the construction and extension of the smelter and related facilities. Management of operational changes, significant project or major modifications to existing facilities are supervised by a defined process that includes global and comprehensive risk analysis, including impacts on First Nations.
2.6 Emergency Response Plan	Conformance	The Entity has developed site specific Emergency Response Plans (ERP) in collaboration with potentially affected Stakeholder groups such as communities, workers and their representatives, and relevant agencies. The Alouette ERP conforms to ISO 14001 and ISO 45001 requirements.
2.7 Mergers and Acquisitions	Conformance	The Due Diligence process for mergers and acquisition materializes through the Owners' Agreement that governs the management of assets.
2.8 Closure, Decommissioning and Divestment	Conformance	The Due Diligence process for closure or decommissioning takes into account environmental, social and governance aspects. Indeed, the Owners' Agreement contains clauses governing the management of assets, in particular the decommissioning of equipment in accordance with applicable environmental requirements.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its material environmental, social and economic impacts in the annual sustainability reporting. The 2021 Sustainable Development Report is available at: https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/rdd_2021_en_2.pdf
3.2 Non-compliance and liabilities	Conformance	In recent history, no significant judgment, fine, penalty or sanction resulting from a major non-compliance has occurred (monetary or other). However, if necessary, the Entity would report this information via the annual Sustainable Development Report. Any non-compliance would then be published in the same manner as compliance data are currently published for OHS and environmental indicators.

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes payments to governments on a legal and/or contractual basis. Those payments are all verified by government revenue agencies. Energy distribution contracts signed with a state-owned company are subject to a government decree.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>The Entity through various means, has implemented complaints resolution tools and mechanisms that are adequate to address stakeholder complaints, grievances or requests for information relating to its operations.</p> <p>The preferred way to resolve disputes is through open dialogue. Internal stakeholders can use those tools that are the Advisory Committee (participatory management mechanism), the Environment, Health and Safety Committee, or the whistleblowing mechanism, which is supported by a neutral and impartial external firm.</p> <p>The ISO 14001 and ISO 45001 Standard audits deployed in the 2017 – 2021 period also help demonstrate adequate stakeholder complaints, grievances and requests for information treatment processes.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has evaluated the life cycle impacts of its only Primary Aluminium product which is a low profile sow cast. A life cycle analysis was performed by an external and independent firm on behalf of the Aluminium Association of Canada (AAC) to establish the carbon footprint of an aluminium ingot produced in the Province of Quebec.</p> <p>A personalized analysis of the report has been prepared for the Entity and presents results even slightly below the Quebec average in carbon footprint. For the purposes of the Environmental Impact Studies and to respect the ISO 14001:2015 requirements, other families of impacts have also been evaluated by the Entity (e.g. the water life cycle on site, the raw material as well as the residues in a circular economy approach).</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>As a joint venture, the Entity provides life cycle information (mainly greenhouse gas emissions) on request to its owners (for themselves or for their customers).</p> <p>The completed forms requested by the shareholders</p>

CRITERION	RATING	COMMENT
		for previous LCA information requests are recorded by the Environment team. Certificates of analysis for finished Aluminium Products are readily available to shareholders.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The methodology, data, limitations and the system boundaries as well as the results of the Quantis study on the carbon footprint of Quebec Aluminium can be communicated by the Entity upon demand.
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 minimises the generation of Aluminium Process Scrap within its own operations. A rejection rate indicator is continuously monitored and challenged at the casthouse (through a lean management visual station) and via the internal dashboard of the metal sector. The Entity's philosophy is to manage the residual materials generated by its activities using the principle of 4R (Reduce, Reuse, Recycle and Recover) in order to eliminate landfill. 100% of the Aluminium is recycled.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	There is no production or recycling of Aluminium alloys by the Entity that produces only high purity Primary Aluminium. 'Off-spec' Aluminium and by-products are recycled internally, or externally, in accordance with the allowances accepted by the owners.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has a recycling strategy described in the Residual Materials Management Plan, which is aimed at optimizing Aluminium recycling according to the 4R principle in order to eliminate landfill. Implementation of the Plan has been successfully verified through ISO 14001 audits.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity with the support of AAC (Aluminium Association of Canada) has implemented a collection and recycling strategy. Accurate measurements and efforts to date are displayed locally, regionally and nationally by all AAC members including the Entity.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The 2021 Sustainable Development Report is publicly available via: https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/rdd_2021_en_2.pdf

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		<p>Annual Sustainable Development Reports for previous years (2010 to 2020) are also available. The 2021 Sustainable Development Report presents a graph of specific energy consumption for smelting and Direct Greenhouse Gas (GHG) emissions by source:</p> <ul style="list-style-type: none"> • The Scope 1 Direct GHG emissions in 2021 were 1.82 t CO₂e/ t Al. • The Scope 2 Indirect GHG emissions are not significant as the only source of energy used is 100% from Hydro-Quebec's hydroelectricity (< 0.01 t CO₂e/ t Al).
5.2 GHG emissions reductions	Conformance	<p>As specified in the 2021 Sustainable Development Report, the Entity is pursuing its reduction efforts by implementing various initiatives. The Entity has achieved a reduction in direct emissions intensity with its reduction technology and has plans to reduce direct GHG emissions related to the replacement of heavy fuel oil by natural gas. The intensity emission caps for its reduction technology are already published by the Province of Quebec's Government as part of the Quebec's Carbon Cap and Trade System for 2021 to 2023.</p> <p>The Entity has published its quantitative direct emissions reduction target for upcoming years in the 2021 Sustainable Development Report: https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/rdd_2021_en_2.pdf</p>
5.3a Aluminium Smelting (management system)	Conformance	<p>The Environmental Management System covers the various aspects of GHG emissions and ensures emissions are well below 8 tonnes CO₂e per tonne Aluminium.</p> <p>As required by provincial government regulations on the Cap and Trade System, direct GHG emissions and the quantification process are verified annually by an accredited third party.</p>
5.3b Aluminium Smelting (up to and including 2020)	Conformance	<p>The results of the Scope 1 and Scope 2 GHG emissions from the production of Aluminium have been maintained below the level of 8 tonnes CO₂e per tonne Aluminium since the commencement of operations in 1992.</p> <p>As required by Quebec regulations regarding the Cap and Trade System, direct GHG emissions and the quantification process are verified annually by an accredited third party.</p>

CRITERION	RATING	COMMENT
5.3c Aluminium Smelting (after 2020)	Conformance	Any increase in production is expected to be at the same or better GHG emission performance as the facilities will use similar technology (or better) and the same energy source.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	Air emissions are quantified annually, and reported to the provincial and federal governments as well as in the Entity's sustainability report. The Entity has various facilities for controlling atmospheric emissions as well as ambient air sampling stations in conformity with its provincial Environmental Permit. The Entity has monitored its Emissions to Air through implementation of the Environmental Management System (EMS) and preventive action plans are implemented to keep emissions in conformance with the legal requirements.
6.2 Discharges to Water	Conformance	No process water is released to the environment. The runoff from the site is routed to a sedimentation basin and sampling of the final effluent is carried out continually. The results are reported monthly to the provincial Ministry of Environment for the purposes of the provincial Environmental Permit. Annual results are also published in the Entity's Sustainable Development Report.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has a procedure on risk management that defines the methodology and criteria for evaluating environmental, health and safety risks, including Spills and Leakages that may contaminate air, water and/or soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Preventive maintenance programs are scheduled and performed. Temporary shutdowns of air scrubbing equipment occur to reduce impacts on vegetation and the community. A 'go/no-go' process and communication to stakeholders has been established. Inspections and monitoring with alarm detection are carried out to detect spills or equipment failures. Emergency Response Plans (ERP), including disclosure to authorities, are in place in case of equipment failure or spills.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Any spill or leak is declared to provincial and federal governmental authorities and followed up by the Entity's Environment team. Spills and planned and unplanned equipment shutdowns (air scrubbers and dust collectors) are tracked and included in the monthly and annual reports transmitted to the provincial Ministry of

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		<p>Environment for the purposes of the provincial Environmental Permit.</p> <p>For major planned shutdowns on air scrubbers (to ensure efficiency of the equipment in the long-term), the Entity informs the local (municipal) authorities and other stakeholders to explain the reasons, anticipated impacts and mitigation measures.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has implemented the required mechanisms to publicly disclose impact assessments of Spills (if any) and remediation actions taken through the annual sustainability reporting.</p> <p>Spill management and Emergency Response Plans (ERP) deployments or drills have been audited for the purposes of ISO 14001. ERP debriefs address Impact Assessments of the spills and remediation actions taken as required.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity's waste management strategy is described in the waste management plan and is based on the life cycle analysis of residues and the principles of mitigation hierarchy.</p> <p>Projects and initiatives on waste reduction or recycling are implemented to improve the performance. The long-term objective is to have a zero waste landfilled.</p> <p>The Entity has maintained a Golden Level Provincial Certification for its waste management plan since 2017. The Entity uses a circular economy approach for their waste management plan and is ISO 14001:2015 certified.</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>Through its annual Sustainable Development Report, the Entity has disclosed the summary of its Hazardous and Non-Hazardous Waste with the disposal method:</p> <p>https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/rdd_2021_en_2.pdf</p> <p>Spent Pot Lining (SPL) is independently reported from the other hazardous wastes of the Entity.</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.

CRITERION	RATING	COMMENT
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	The Entity stores and manages Spent Pot Lining (SPL) in a way that prevents the release to the environment. The Entity has an approved building with a certificate of authorization from the Provincial Ministry of Environment for the safe storage of SPL. The Entity has implemented a detailed procedure to ensure the safe loading/unloading operations and to minimize particle emissions. Official quarterly inspections are conducted and documented.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity can demonstrate its ability to optimize processes for the recovery and recycling of carbon and refractory materials from SPL.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	The Entity does not landfill untreated SPL. Spent Pot Lining is stored inside a controlled warehouse and SPL is not landfilled or stockpiled outside. All SPL is sent to an external and approved treatment plant.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity does not landfill treated SPL nor stockpile SPL. All SPL is sent to an approved external treatment plant. The SPL management plan is regularly reviewed. Treated SPL residue (the refractory portion) may occasionally be sent by the SPL treatment plant to an authorised landfill site or recycled or valorised.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity does not discharge SPL into the environment, including marine or aquatic environments. The SPL management plan is audited for the purpose of the ISO 14001 certification.
6.8a Dross (recovery)	Conformance	According to the supplied evidence, internal recycling of Dross is privileged. The other portion of Dross is recycled by external specialized and authorized firms. The recovery rate of Aluminium and other Dross residues is maximized depending on the mandated firm.
6.8b Dross (recycling)	Conformance	The Entity maximizes the recycling of treated Dross residues. In some cases, 100% of the residue is recycled while in other situations, a small fraction is disposed of at authorized sites.

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6.8c Dross (review of alternatives)	Conformance	The Entity has reviewed alternative options to landfilling of Dross residues. In addition, a strategic management plan is implemented to reduce landfill and technological improvements are currently underway.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	<p>A life cycle assessment has been performed on the water usage for the site. All water is provided by municipal pumping systems. Water is used predominantly for cooling water for the process and for domestic purposes.</p> <p>The Entity does not own nor control any hydropower facility nor directly withdraws fresh or underground water for operational or domestic reasons. The only groundwater withdrawal is for non-significant quantities for the purpose of environmental monitoring.</p>
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity has conducted a water life cycle assessment. All process cooling water is sent the two Fume Treatment Centres (CTF: the Fume Scrubbers). There is no process effluent discharged to the environment or to any sewer. All run-off water is collected and treated in a settling pond and monitored before discharging into the St-Laurent Gulf. Domestic effluents are collected and disposed into the city wastewater treatment facility.</p> <p>The Entity has no significant influence or material risk on water quality in the Watersheds in the Area of Influence.</p>
7.2a Water management (management plans)	Conformance	<p>The Entity has implemented a water management procedure that includes monitoring of the run-off water collected and discharged as well as underground water. The Entity reports these results to the Provincial Ministry of Environment for the purposes of the Environmental Permit.</p> <p>The Entity has no significant influence or material risk on water quality in the Watersheds in the Area of Influence.</p>
7.2b Water management (monitoring)	Conformance	<p>The monitoring of the effectiveness of the water management plan is performed through the monitoring of the results of the run-off effluent, making sure they stay below the regulatory limits. All data and exceedances, if any, are reported and corrected as prescribed by the Environmental Permit.</p>
7.3 Disclosure of water usage and risks	Conformance	A summary of the water data is included in the annual reporting presented to stakeholders. The water

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		<p>consumption does not present a significant impact, as all process water is reused internally.</p> <p>The water consumption and the run-off water results are presented in the 2021 Sustainable Development Report:</p> <p>https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/rdd_2021_en_2.pdf</p> <p>The Entity has no significant influence or material risk on water quality in the Watersheds in the Area of Influence.</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>Impact Assessment studies were conducted by a third party in 1989 for Phase 1 and in 2002 for Phase 2 expansion projects. In 2009, a new study was performed for a potential expansion project. The biodiversity risk studies demonstrate the absence of threatened or vulnerable species in the Entity's Area of Influence.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>The Entity's has a Biodiversity Action Plan (BAP), determined by the provincial Environmental Permit, which requires the monitoring of all potential impact factors on biodiversity.</p> <p>Surveys and monitoring are conducted annually with the use of bio-indicators. In addition, an ambient air monitoring program addresses the Area of Influence. No impacts have been noted to date. A voluntary annual inspection of targeted vegetation is also implemented by the Entity.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The Provincial Ministry of Environment developed specifications and requirements of the Biodiversity Action Plan monitoring programs. Impact assessments were subject to public consultation before construction and expansion.</p> <p>The Entity has implemented avoidance and minimisation measures. Rehabilitation, restoration or offsetting measures were not required.</p>
8.2c Biodiversity management (reporting)	Conformance	<p>A summary of the results of the ambient air and impacts on biodiversity are presented in annual sustainability reports. The report was shared with stakeholders during the annual presentation of the Entity's performance and is available at:</p> <p>https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/rdd_2021_en_2.pdf</p>

CRITERION	RATING	COMMENT
8.3 Alien Species	Conformance	The Entity has implemented a procedure to manage the risk of Alien Species introduction, mainly related to foreign packaging materials. The Entity requires that all vessels are certified by Rightship Approval and follow the International Marine Organization (IMO) procedures for the ballast water.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity implements efforts to respect Human Rights in ways appropriate to its size and circumstances, including the implementation of a respectful workplace policy, a procedure for behaviour management, the establishment of an advisory committee, and the code of ethics and business conduct. The respectful workplace policy explicitly refers to the Canadian Charter of Rights and Freedoms 1982.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a respectful workplace policy, a procedure for behaviour management, the establishment of an advisory committee, as well as the code of ethics and business conduct.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has implemented a respectful workplace policy, a procedure for behaviour management, the establishment of an advisory committee, as well as the code of ethics and business conduct.
9.2 Women’s Rights	Conformance	The Entity has implemented the necessary policies, processes or mechanisms to ensure respect for the rights and interests of women. The code of ethics and business conduct as well as the respectful workplace policy and the procedure for behaviour management further contribute to ensuring the respect for the rights and interests of women.

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9.3 Indigenous Peoples	Conformance	The Entity consults and cooperates in good faith with the local First Nations community. Indigenous Peoples are consulted when the Entity puts forward an initiative, including land use, employment, economic opportunities and presence in the community. Permanent communication channels have been implemented.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	Whilst the Entity has not implemented any project that potentially impacts on Indigenous Peoples, processes have been established in order to obtain Free, Prior and Informed Consent (FPIC) of the local Indigenous Peoples prior to the approval of any project affecting their lands or territories and other resources.
9.5 Cultural and sacred heritage	Conformance	During the establishment of the Entity and its expansion, no sacred or cultural heritage sites and values were impacted, and therefore no specific action was required from the Entity to avoid or remedy any impacts. The Entity has established and implemented permanent communication channels with the band council.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity is located in an industrial sector dedicated to heavy industry and complies with the development plan and zoning plan of the City of Sept-Îles (Province of Quebec). Environmental impact assessments determined that there was no significant impact on land use.
9.6b Resettlements (where unavoidable)	Conformance	Since no displacement or relocation of human activities has occurred or is foreseen, there Entity does not require a resettlement action plan. The closest community is located approximately 14 kilometres from the Entity and there are no neighbours, recreational or commercial activities around the Entity, except for port activities.
9.7a Local Communities (rights and interests)	Conformance	The Entity has demonstrated that it respects the legal and customary rights and interests of Local Communities through the impact study associated with the most recent expansion of the plant. Stakeholders' group representatives including the First Nations have been interviewed.
9.7b Local Communities (impacts)	Conformance	The Entity prevents and addresses any adverse impacts on Local Community livelihoods through its participation in the Environmental Monitoring Observatory of Sept-Îles Bay: http://baie.septiles.ca/index.php (available only in French);

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		the Air Quality Round Table of Sept-Îles: http://air.septiles.ca/index.php (available only in French); or via the most recent external perception survey.
9.7c Local Communities (livelihoods)	Conformance	The Entity explores with Local Communities opportunities to respect and support their livelihoods (through its support to economic development organizations, particularly with respect to initiatives highlighting the expertise of aboriginal businesses).
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity does not contribute to armed conflict nor Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity is not located in CAHRAs, as Canada has been assessed as a low-risk country. The Entity has provision to prevent supplying raw materials to CAHRAs.
9.9 Security practice	Conformance	A private contractor manages the site security. An internal procedure describes the control and access process to the site. The Emergency Response Plan addresses the security of the site.
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 and collectively bargain. The Workers aren't associated in a union but rather negotiate their working conditions through an Advisory Committee. Members of the Committee consist mainly of elected representatives from the Workers.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The operation of the Advisory Committee is enshrined in a reference manual. The minutes from the meetings of this Committee are accessible to employees via an internal intranet portal. All Collective Bargaining processes are implemented through the Advisory Committee.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as the Entity does not operate in a country where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity has demonstrated not to engage in nor support Child Labour. The basic minimum age to work for the Entity is 18 years old. All student jobs or internships are remunerated and a basic training or mentoring program is offered to all new temporary employees.

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

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		regulations of the Province of Quebec and from Canada.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold Workers in Debt Bondage or force them to work in order to pay off a debt. Several procedures have been developed by the Human Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Quebec and from Canada.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not unreasonably restrict the freedom of movement of Workers and there is no on-site housing. Several procedures have been developed by the Human Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Quebec and from Canada.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>The Entity does not withhold any original identity documentation work permit, travel document or training certificates. All personal human resources files remain accessible to the concerned employee during opening hours and are comprised of reproductions or photocopies of employees' documents.</p> <p>Several procedures have been developed by the Human Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Quebec and from Canada.</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>The employees have the freedom to terminate their employment within the legal frame of the Province of Québec and Canada legislation. The Entity has demonstrated not to engage in nor support the use of forced labour.</p> <p>Several procedures have been developed by the Human Resources Department in order to demonstrate its compliance with applicable labour laws and regulations of the Province of Quebec and from Canada.</p>
10.4 Non-Discrimination	Conformance	The Entity implements diligent effort to not engage in or support Discrimination, in any type or form, in a manner appropriate to its circumstances. Those efforts include, amongst others: the implementation of a respectful workplace policy, a procedure for behaviour management, the establishment of an Advisory Committee, as well as the code of ethics and business conduct. The Entity also applies the

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		prescribed provincial labour work standards in its hiring processes.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers for work related conditions, and does this through different communication platforms.
10.6 Disciplinary practices	Conformance	The Entity neither engages in, nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. The Entity's disciplinary practices are framed around the legally established standards regarding labour rights, and follow the logic of gradation. The risks of mental coercion are managed through a set of tools that include the implementation of a respectful workplace policy, a procedure for behaviour management, the setup of an Advisory Committee, as well as the code of ethics and business conduct.
10.7a Remuneration (living wage)	Conformance	The Entity has demonstrated that it appropriately remunerates Workers. To ensure this, a salary survey is conducted annually with support of an external firm. Results are communicated to employees.
10.7b Remuneration (method of payment)	Conformance	Payments are made in a timely manner and on a weekly basis, in legal tender and fully documented through electronic support.
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on working time (including Overtime), public holidays and paid annual leave. Annual leave (vacation time) policies are clear and formally documented. Vacation time is granted fairly and equitably.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	An Occupational Health and Safety (OHS) Policy is implemented and was reviewed and signed by the President & Chief Executive Officer. The Policy supports the mission of the organization to achieve a strong safety culture and is also periodically reviewed.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The OHS Policy is presented to all new Workers, as part of the induction process. All visitors and contractors' employees are exposed to the key-objectives of the OHS Policy. The Policy is posted in different areas of the plant and is available on the Entity's Intranet.

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		The application of the OHS Policy for employers, contractors and visitors is in conformity with the Entity's ISO 45001 certification.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The OHS Policy includes a commitment to the prevention of accidents and to comply with applicable legal requirements. Audit programs are conducted on a continual basis to ensure compliance. The Entity and all Workers, visitors and contractors share the responsibility of their own health and safety and the responsibility for the health and safety of co-workers.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The OHS Policy refers to the right of workers to participate in accident prevention and the safe practices for their work. The specific details of the duty to refuse or stop any unsafe work is defined in an internal procedure. The risk management and the right to refuse or stop unsafe work processes respect the ISO 45001 requirements.
11.2 OH&S Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OHS) Management System, which is certified to ISO 45001:2018. The Entity performs internal audits on a continuous basis. The Entity's valid ISO 45001 certificate can be viewed at: https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=ALOUETTE&noCertificat=60583-1-01#recherche_rcc_input
11.3 Employee engagement on health and safety	Conformance	Workers have access to the established Central Joint Occupational Health and Safety (OHS) Committee and supported by joint Sectorial Committees. The committees meet approximately ten times a year and minutes of meetings are posted on billboards and on the Intranet. Different means are available for the Workers to provide suggestions and improvements such as pre-shift meetings, workplace inspections or projects approvals.
11.4 OH&S performance	Conformance	The multiple OH&S Key Performance Indicators (results oriented and proactive) are strictly monitored and compared with peers or best practices. The Entity aims for continuous improvement in its OH&S performance. Various statistics and OHS reports are internally published to support continuous improvement.

Document Control and Version History

Revision	Date	Notes
0	13 July 2020	Issued (Initial certification audit)
1	30 January 2022	Surveillance Audit