
**ASI CERTIFICATION
PERFORMANCE
STANDARD**



PRESENTED TO

ALUDIUM FRANCE SAS

CERTIFICATE
NUMBER

275

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

18 APRIL 2023

DATE OF EXPIRY

17 APRIL 2026

CERTIFIED SINCE

18 APRIL 2023

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*

CERTIFICATION SCOPE

The Aludium Castelsarrasin plant (France), including semi-fabrication (Production of coils in cold rolling mill).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

| | |
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| MEMBER NAME | Aludium Premium Aluminium |
| ENTITY NAME | Aludium France SAS |
| CERTIFICATION SCOPE | The Aludium Castelsarrasin plant (France), including semi-fabrication (Production of coils in cold rolling mill). |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none">• Semi-Fabrication |
| ASI STANDARD | <ul style="list-style-type: none">• Performance Standard V2 |
| AUDIT TYPE | <ul style="list-style-type: none">• Initial Certification Audit |
| AUDIT FIRM | DNV Business Assurance Services UK Ltd. |
| AUDIT DATE | <ul style="list-style-type: none">• 13 – 15 September 2022 |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">• 15 March 2023 |
| AUDIT SCOPE | <p>The audit scope covers the Aludium Castelsarrasin plant (France), including semi-fabrication (Production of coils in cold rolling mill).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Semi-Fabrication <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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. |

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- ✔ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - ✔ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 18 April 2023 – 17 April 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 18 April 2024

CERTIFICATE NUMBER 275

SUMMARY OF FINDINGS

| CRITERION | RATING | COMMENT |
|--|-------------|---|
| PRINCIPLE 1 BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | The Entity has multiple systems in place to maintain awareness of and ensure Compliance with Applicable Law. The Code of Conduct is circulated to all Stakeholders and displayed on information panels for employees, also reiterates that all the Entities of the group must adhere to local and international regulations at all times. |
| 1.2 Anti-Corruption | Conformance | The Code of Conduct commits the Entity to work against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. Selected employees identified as being more exposed to this risk are trained, specifically on those subjects. |
| 1.3 Code of Conduct | Conformance | The Entity has implemented the Group level Code of Conduct which has been developed based on international standards and includes principles relevant to environmental, social and governance (ESG) performance. The Code is provided to all new employees upon hiring. |
| PRINCIPLE 2 POLICY & MANAGEMENT | | |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | The Entity has an integrated Sustainability Policy, signed by the Sustainability Manager, the Plant Director and the Health, Safety, Environmental and Quality Manager, which integrates the practices as prescribed in the ASI Performance Standard. |
| 2.1b Environmental, Social, and Governance Policy (senior management) | Conformance | The Entity's Health, Safety, Environment and Quality (HSEQ) Policy is signed and regularly reviewed by the Site Director, the HSEQ Manager and the Energy Representative. A sustainability representative has been nominated. |
| 2.1c Environmental, Social, and Governance Policy (communication) | Conformance | The Entity has a Health, Safety, Environment and Quality Policy which is posted on the display panels and the TV screen on the factory floor for Workers and is also communicated to sub-Contractors and clients. The elected employee representatives' committee (CSE) also regularly communicates on topics from the Policy. |
| 2.2 Leadership | Conformance | The Plant Director is nominated as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard. |

| CRITERION | RATING | COMMENT |
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| 2.3a Environmental and Social Management Systems (environmental) | Conformance | The Entity monitors and reviews its strategic environmental indicators in monthly management meetings and manages them in KmProd software. The Entity also holds a current and valid ISO14001 certification. |
| 2.3b Environmental and Social Management Systems (social) | Conformance | The Entity has multiple systems for managing its social and societal subjects: the Aludium Code of Conduct, the Human Rights Policy and procedures, the Entity's risk register (« Document Unique d'Evaluation des Risques»); other legally required monitoring of social and societal obligations (such as the annual personal interviews and bi-annual professional assessments). Indicators are tracked on the quality management software KmProd. The meetings of the elected Employee Representatives' Committee (Comité Socio-Economique, or CSE) is another method where social aspects are managed and monitored in the workplace. |
| 2.4 Responsible Sourcing | Conformance | The Entity's supplier evaluation questionnaire contains all sustainability aspects outlined in the terms and conditions. The Entity requires their suppliers to sign standard terms and conditions which contain sections on Business Ethics, Respect for Human Rights, the Environment and Health and Safety. The Entity has a site-level purchasing policy, the main sustainability criterion used for selecting a supplier is its proximity to the Entity, which has a positive impact on local businesses and is aligned with the site's goal of reducing CO ₂ emissions from transportation. |
| 2.5 Impact Assessments | Conformance | The Entity has procedures for conducting impact assessments, even though it has not undertaken any New Projects or Major Changes to existing Facilities in recent years, and has not planned any for the future. In the event of Major Changes to the site, the Entity would commission specialist consultancy, historically used by the site for impact assessments. For the validation of conformity to Human Rights Principles, the Entity has a dedicated procedure, based on the UN Guiding Principles for Business and Human Rights. This includes a gender analysis. The aspects of Governance, Social, Human Rights and the Environment are also part of the corporate Due Diligence process defined for Mergers and Acquisitions, and any New Project must follow Aludium Group's Compliance procedure. |
| 2.6 Emergency Response Plan | Conformance | The Entity holds a current certification to ISO14001 which is valid until 2024. In the latest report from the |

| CRITERION | RATING | COMMENT |
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| | | Integrated Management Systems audit and the certification was reviewed, no major conformances were raised. |
| 2.7 Mergers and Acquisitions | Conformance | The Entity has not been subject to any merger or acquisition since its creation, however, if this occurred, the Entity would engage the Group level Mergers and Acquisitions Policy to review environmental, social and governance issues in the Due Diligence process, which is based on principles by the Organization for Economic Co-operation and Development (OECD). |
| 2.8 Closure, Decommissioning and Divestment | Conformance | The Entity has not commenced any closure, decommissioning or divestment since its creation, however, if this happened, the Entity would commission an external specialist company Antea historically used by the site for this type of project. |
| PRINCIPLE 3 TRANSPARENCY | | |
| 3.1 Sustainability Reporting | Conformance | The Entity publicly discloses its governance approach and its material environmental, social and economic impacts as part of the Code of Conduct and the annual Group level Sustainability Report, and publishes those for all Stakeholders at: https://aludium.com/3d-flip-book/sustainabilityreport_2021_en/ |
| 3.2 Non-compliance and liabilities | Conformance | The Entity has not had any significant fines, judgments, penalties or non-monetary sanctions for non-compliance over the last year, however, it would publicly disclose the information at the Group level in their annual Sustainability Report, page 18: https://aludium.com/3d-flip-book/sustainabilityreport_2021_en/ |
| 3.3a Payments to governments (legal and contractual) | Conformance | The Entity only makes or has made on its behalf, payments to governments on a legal and/or contractual basis. The Entity performs independent regulatory external audits by accredited agencies to verify. |
| 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 a complaints mechanism developed and implemented as part of its Environmental Management System The Entity holds a current and valid certification to ISO14001. In the latest report from the Integrated Management Systems audit and the certificate was reviewed, no major conformances were raised. Certification is valid until 2024. |

| CRITERION | RATING | COMMENT |
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| PRINCIPLE 4 MATERIAL STEWARDSHIP | | |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts) | Conformance | The Entity has conducted its Life Cycle Assessment (LCA) using a tool developed by ADEME (France's Agency for Environmental Transition). It is based on ISO14040 and ISO14044. Assumptions and limitations are included, and the evaluation of impacts is cradle-to-gate. |
| 4.1b Environmental Life Cycle Assessment (cradle to gate) | Conformance | The Entity has defined it would communicate LCA information to its clients upon request, on an ad-hoc basis; this would be managed by the ASI coordinator; the site has not received any such requests to date. |
| 4.1c Environmental Life Cycle Assessment (public communication) | Conformance | The Entity does not plan to communicate its LCA information publicly. |
| 4.2 Product design | Conformance | The Entity integrates clear objectives in its production to optimise the manufacturing process and minimise scrap. The Entity has defined an objective for the utilisation of material and increases this each year. Any aluminium scrap produced is then entirely reused in another plant of the Aludium Group. The utilisation indicator is tracked for every aluminium coil on the KmProd software. All Aludium plants have integrated LCA considerations into their product design and development strategy. |
| 4.3a Aluminium Process Scrap (targets) | Conformance | The Entity has implemented systems to minimise the generation of scrap, and already recovers 100% of it by collecting it, keeping alloys separated for easier recovery, and returning it to the Alicante and Amorebieta plants. Scrap indicators are tracked through the KmProd software, showing that the Entity increases its recovery rate year after year. Reasons for improvement include adjustments made by the production planning team and an improvement in the quality of the aluminium supply. |
| 4.3b Aluminium Process Scrap (alloy separation) | Conformance | The Entity has a clear and practical system in place for separating aluminium alloys and grades per chemical composition for recycling. The Entity's system incorporates the application of different colours of tape on the alloys, and bins of the corresponding colour on the factory floor where scrap is sorted out for recovery. |
| 4.4a Collection and recycling of products at end-of-life (strategy) | Conformance | The Entity implements the Group's recycling strategy whereby the Entity sends 100% of scrap to the Amorebieta and Alicante plants for re-use. Those partners need the scrap as part of their production |

| CRITERION | RATING | COMMENT |
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| | | therefore Aludium France measures and forecasts its scrap and how much will be sent to each plant. The Aludium Group also states a commitment to aluminium recycling in its Code of Conduct. |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance | The Entity is engaged in international initiatives at the Group level to promote the recycling of end-of-life products, such as AluFoil (formerly the European Aluminium Foil Association - EAFA). The Entity is part of AluFoil (formerly EAFA). |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS | | |
| 5.1 Disclosure of GHG emissions and energy use | Minor Non-Conformance | <p>The Entity collects Greenhouse Gases (GHG) emissions and energy use data for Scopes 1, 2 and 3. To achieve this carbon footprint evaluation, the Entity has commissioned a third-party specialist, with a methodology based on ISO 14064-1:2006. Any limitations are addressed in the report. The full report was being finalised at the date of the audit, even though the interim results were available for review. The data has not been publicly disclosed, however, the Entity has made plans for all Environmental and Social indicators to be published in the next Group Sustainability Report.</p> <p>The Entity monitors its energy use per source and reduces it year on year; progression is discussed at monthly management reviews. The Entity is also working towards ISO50001 certification.</p> |
| 5.2 GHG emissions reductions | Minor Non-Conformance | <p>The Entity has designed energy reduction targets. The figures were presented in Aludium France's annual Energy Review (Revue Energétique Aludium 2022). The site already collects these data as part of its certification to ISO50001. Energy indicators are followed by the EHS team in the quality management software KMProd.</p> <p>The source data is also consolidated by the site in its sustainability data collection file submitted to the head office for future publication.</p> <p>The Entity however has not yet designed and published GHG emissions targets, it has only designed energy reduction targets. There are emissions performance forecasts for the 2021-2025 period, but those do not represent an actual goal with action plans aimed at achieving it.</p> |
| 5.3a Aluminium Smelting (management system) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 5.3b Aluminium Smelting (up to and including 2020) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |

| CRITERION | RATING | COMMENT |
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| 5.3c Aluminium Smelting (after 2020) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE | | |
| 6.1 Emissions to Air | Conformance | <p>The Entity quantifies and reports its Emissions to Air through a declaration to local authorities in a dedicated platform (Gestion électronique du registre des émissions polluantes, GEREPE).</p> <p>The latest inspection report by a third-party has shown no emissions above the legal limits set by the Entity's industrial permit (Arrêté Préfectoral).</p> <p>The Entity also implements plans to minimise the adverse impacts of its emissions. One notable initiative already in place is a biofilter for removing the lamination oil from air emissions; this has also been inspected by a third-party and has confirmed the achievement of a significant reduction of emissions.</p> |
| 6.2 Discharges to Water | Conformance | <p>The Entity quantifies and reports its Emissions to Air through a declaration to local authorities in a dedicated platform (Gestion électronique du registre des émissions polluantes, GEREPE).</p> <p>The latest inspection report by a third-party has shown no emissions above the legal limits set by the Entity's industrial permit (Arrêté Préfectoral).</p> <p>The Entity also implements plans to minimise the adverse impacts of its emissions. One notable initiative already in place is a biofilter for removing the lamination oil from air emissions; this has also been inspected by a third-party and has confirmed the achievement of a significant reduction of emissions.</p> |
| 6.3a Assessment and Management of Spills and Leakage (assessment) | Conformance | The Entity has identified its main risk of leakage or spill and the behaviours that might lead to it occurring. Which are outlined in a procedure. The Entity undertakes exercises on chemical prevention to minimise the risk. |
| 6.3b Assessment and Management of Spills and Leakage (management) | Conformance | <p>The Entity has compliance controls and a monitoring programme to prevent and detect potential Spills and Leakages.</p> <p>The procedure includes prevention, instructions on how to communicate internally and externally, how to contain the potential chemical incident, remediation, plus a template for reporting areas to improve.</p> |
| 6.4a Reporting of Spills (immediate disclosure) | Conformance | In case of emergency, the Entity would adhere to its emergency plan and immediately make a declaration to the regional authority for environmental and urbanism management (Directions Régionale de l'Environnement, de l'Aménagement et du Logement - |

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| | | DREAL) and other affected parties. Those steps are listed in both the spill management procedure and the emergency preparation procedure. |
| 6.4b Reporting of Spills (regular reporting) | Conformance | In case of Spill or Leakage, the Entity would publicly disclose in the Group level Sustainability Report its Impact Assessments and remediation actions are taken. The site has never had a significant spill. The disclosure table is available on page 18: https://aludium.com/3d-flip-book/sustainabilityreport_2021_en/ |
| 6.5a Waste management and reporting (strategy) | Conformance | The Entity's waste management strategy is designed in accordance with the Waste Mitigation Hierarchy. As per legal requirements, the Entity tracks in its waste register its waste by type and disposal method. The company consolidates the quantities per type and material, and aims to reduce them year on year; progression is discussed at monthly management reviews (CODIR). |
| 6.5b Waste management and reporting (disclosure) | Conformance | The Entity discloses monthly its quantities of Hazardous and Non-Hazardous Waste on a government platform, and discloses publicly on an annual basis the quantity of Hazardous and Non-Hazardous Waste generated by its activities, and its associated Waste disposal methods, page19: https://aludium.com/3d-flip-book/sustainabilityreport_2021_en/ |
| 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 (state 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) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |

| CRITERION | RATING | COMMENT |
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| 6.7b Spent Pot Lining (SPL) (recovery and recycling) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7c Spent Pot Lining (SPL) (Untreated SPL) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7d Spent Pot Lining (SPL) (review of alternatives) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7e Spent Pot Lining (SPL) (marine and aquatic environments) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.8a Dross (recovery) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.8b Dross (recycling) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.8c Dross (review of alternatives) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |

PRINCIPLE 7 WATER STEWARDSHIP

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| 7.1a Water assessment (mapping) | Conformance | The Entity has mapped its water withdrawal and use by source and type. The entity uses both municipal water and river water, and applies the thresholds defined in its industrial permit (Arrêté Préfectoral). Consumption is monitored daily, weekly and monthly, and reviewed by senior management during the CODIR (Management Review) meeting. |
| 7.1b Water assessment (risk assessment) | Conformance | The Entity has used the Aqueduct Tool to assess the water-related risk in its Area of Influence, developed by the World Resources Institute. The result page shows the sectors consuming the most water, a description of the water risk in the Occitanie region where Aludium is located, a map of local wetlands (zones humides) and how many miles of river are running through the area. The overall risk for Aludium's location is identified as medium. |
| 7.2a Water management (management plans) | Conformance | The Entity's water management plans address its material risks and have been in place for several years. A numerical target has been set for 2022 to further reduce the consumption of water per ton of finished product. The Entity already consumes less than half of what its industrial permit (Arrêté Préfectoral) allows, and further reductions are expected as the action plan continues to be implemented. |

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| 7.2b Water management (monitoring) | Conformance | <p>The Entity's water management plans have been in place for several years.</p> <p>Water indicators are monitored weekly by the Environmental, Health and Safety (EHS) team and recorded in the quality management software KmProd. The indicators and objectives also are reviewed in the monthly reviews with senior management (CODIR). Actions already implemented include conducting a water leak reduction campaign by the maintenance team, and future actions include trials on reusing neutralised industrial water.</p> <p>The action plan is formalised on the KmProd database for 2022, with the percentage of progress achieved.</p> |
| 7.3 Disclosure of water usage and risks | Conformance | <p>The Entity reports its water consumption both through a declaration to local authorities on a dedicated platform (Gestion électronique du registre des émissions polluantes, GEREPE) with an annual declaration of week-by-week data. It also makes it publicly available, alongside its water risks, through the Aludium Group Sustainability Report, page 18: https://aludium.com/3d-flip-book/sustainabilityreport_2021_en/</p> |
| PRINCIPLE 8 BIODIVERSITY | | |
| 8.1 Biodiversity assessment | Conformance | <p>The Entity has undertaken a biodiversity assessment to evaluate the risk and materiality of the impacts of the land use and activities in its Area of Influence. The assessment concludes that the Entity has very low to no negative impact on biodiversity. It however has a positive impact due to its buffer area of natural woodland it owns and maintains as a natural space next to the industrial site. The variety of open, semi-open and wooded areas on this land constitutes an attractive habitat for multiple species of European birds, invertebrates and other wildlife, and has been found to constitute a biodiversity enhancement.</p> |
| 8.2a Biodiversity management (biodiversity action plans) | Conformance | <p>The biodiversity assessment concludes that the Entity has very low to no negative impact on biodiversity. The plant has an action plan to further improve biodiversity, by undertaking late-season grass cutting, managing the wooded area more closely, making plans to monitor the potential arrival of exotic species, informing the workforce on the topic of biodiversity, and installing beehives.</p> <p>The ASI coordinator has taken the recommended actions from the biodiversity study, entered them into quality management software KmProd and has applied deadlines; the software allows tracking the</p> |

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| | | percentage progress of each action and monitoring its effectiveness. |
| 8.2b Biodiversity management (consultation and mitigation hierarchy) | Conformance | The action plan was consultative, designed in collaboration with the biodiversity consultant, and built taking into account the mitigation hierarchy. |
| 8.2c Biodiversity management (reporting) | Conformance | The data relating to Biodiversity outcomes, action plans and progress is disclosed in the Entity's Sustainability Report, page 20: https://aludium.com/3d-flip-book/sustainabilityreport_2021_en/ The Entity's ASI coordinator is proposing to share the results of the Biodiversity assessment with external Stakeholders in late 2023. |
| 8.3 Alien Species | Conformance | The Entity's potential risk of introducing Alien Species is minimal and well-managed through different means including legal requirements to buy pallets treated with chemicals to prevent parasites. The Entity has decided to purchase only pallets made up of locally grown and processed wood, as per the requirements of its Responsible Sourcing Policy. The Entity has taken into account the recommendations of the biodiversity assessment and made concrete plans to continuously monitor the potential introduction of exotic species in its Area of Influence. |
| 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 mines) | 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's Group level Code of Conduct states their commitment to respect Human Rights. The Code explicitly prohibits Child Labour, respects the freedom of employees to join legally authorised associations; condemns Forced Labour, physical abuse, and any other form of abusive behaviour towards employees and other organisations they do business with, see section 7.5 "Social Citizenship" page 24: |

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| | | <p>https://aludium.com/3d-flip-book/code-of-conduct Human Rights Due Diligence is also taken into account in the Group's procedure for Mergers and Acquisitions.</p> |
| 9.1b Human Rights Due Diligence (process) | Conformance | <p>The Aludium Group implements a Human Rights Compliance Validation Procedure, aiming to detect the risks associated with Human Rights violations caused by its direct and indirect activities. The procedure was designed based on the Human Rights Compliance Assessment (HRCA) methodology created by the Danish Council on Human Rights.</p> <p>The workflow has been adjusted by the Entity to add the role of the elected employee representatives' committee (CSE) to collect and discuss any Human Rights risk raised by the questionnaire. As per the procedure, any issues raised must be communicated to the designated Compliance Officer who will initiate an investigation. The results are brought to the attention of the Sustainability Council and reported to the Board in an annual memo. A corrective action and remediation plan must be drafted and implemented. The Entity also runs a confidential Employee Reporting Channel.</p> |
| 9.1c Human Rights Due Diligence (remediation) | Conformance | <p>The Entity's potential Human Rights risk was assessed as very low and the Entity has not been identified as having contributed to actual adverse impact.</p> <p>Additionally, the Entity purchases from suppliers that are both certified to the ASI Performance and Chain of Custody Standards.</p> <p>If the Entity has identified itself as having caused or contributed to adverse Human Rights impact, it would follow the investigation and remediation procedure described in the Group's Human Rights Validation Procedure.</p> |
| 9.2 Women's Rights | Conformance | <p>The Entity's Code of Conduct states the Group's commitment to upholding women's rights. A Women's Committee has also been created recently at the Group level to 1) Create a space for open discussion between women working at the Entity, 2) Promote the attractiveness of industrial jobs for women.</p> <p>The Entity has multiple processes to ensure respect for the rights and interests of women. The results of its "Bilan Egalité Hommes-Femmes" (evaluation of Male-Female equality) show a good performance on indicators such as the number of women amongst the highest remunerations in the business, job promotion rate, percentage of women having received a salary</p> |

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| | | <p>raise in the year following their maternity leave, and the number of women sitting in the Management Committee. There are women in every department and at every level of responsibility at the Entity, and interviews confirmed the site's encouragement of women's empowerment.</p> <p>The Entity's performance is communicated internally and externally in the Sustainability Report 2021, page 16: https://aludium.com/3d-flip-book/sustainabilityreport_2021_en/</p> |
| 9.3 Indigenous Peoples | Not Applicable | There are no Indigenous People, lands, territories or resources in the Area of Influence of the Entity. |
| 9.4 Free, Prior, and Informed Consent (FPIC) | Not Applicable | There are no Indigenous People, lands, territories or resources in the Area of Influence of the Entity. |
| 9.5 Cultural and sacred heritage | Not Applicable | There are no Indigenous People, lands, territories or resources in the Area of Influence of the Entity. |
| 9.6a Resettlements (avoid or minimise) | Conformance | The risk of re-settlement is low to non-existent where the Entity operates. The site has been in the same location since the 1970s and has not had any major extensions or resettlements. This was confirmed by the review of historical maps in previous impact assessments. The stability of the situation was also confirmed during external Stakeholder interviews. |
| 9.6b Resettlements (where unavoidable) | Conformance | The Entity is not planning any Major Change that would lead to resettlements. If a Major Change to the industrial Facility implied a risk of resettlement, the project would be subject at a minimum to an impact assessment, a Human Rights compliance validation procedure, and a consultation of affected Stakeholders. |
| 9.7a Local Communities (rights and interests) | Conformance | <p>In its "Action Sociale auprès de la communauté locale" procedure (social engagement with Local Communities), the Entity has mapped its Stakeholders and recognises its responsibility to contribute positively to the development of the communities in which it operates and where it has commercial interests, as well as to minimise any potential adverse impact.</p> <p>The Code of Conduct reiterates this commitment, see section 7 "Relations with our communities": https://aludium.com/3d-flip-book/code-of-conduct</p> <p>External Stakeholder interviews confirmed the positive relationship of the Entity with neighbouring communities.</p> |

| CRITERION | RATING | COMMENT |
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| 9.7b Local Communities (impacts) | Conformance | The Entity has very low to non-existent adverse impact on the Local Community livelihoods resulting from its activities. The Entity also has a complaint reporting procedure for neighbouring communities (Protocole de traitement des plaintes du voisinage) derived from ISO14001 requirements, however, there has not been any significant complaint in recent years. |
| 9.7c Local Communities (livelihoods) | Conformance | The Entity's social action matrix defines a list of actions for positive contribution, with a designated person in charge, a frequency of follow-up, a measurement metric, and an objective, such as participating annually in a local job fair, welcoming on site two or more interns from local schools per quarter, or sharing of good practices in monthly meetings with other local plants. In July 2022, the Entity also launched a Local Community survey to collect information on what the population thinks of and expects from the Entity. |
| 9.8 Conflict-Affected and High-Risk Areas | Conformance | The Entity's potential impact has been assessed as part of the Aludium Group's Human Rights Due Diligence assessment and has concluded that it does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas. |
| 9.9 Security practice | Conformance | The Entity's site is small and is not involved with any public and private security providers. |
| PRINCIPLE 10 LABOUR RIGHTS | | |
| 10.1a Freedom of Association and Right to Collective Bargaining (freedom of association) | Conformance | The Entity respects its Workers' Freedom of Association and Right to Collective Bargaining. Representatives from major trade unions are active on site. Aludium France also has an elected employee representatives' committee mixing Workers and management (the Comité Social et Economique - CSE). |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining) | Conformance | The Entity respects its Workers' Freedom of Association and Right to Collective Bargaining and uses as a reference the Collective Bargaining agreement of the local Metal industry sector, "Convention Collective de la Métallurgie Midi-Pyrénées", and participates in the process in good faith. |
| 10.1c Freedom of Association and Right to Collective Bargaining (alternative means) | Not Applicable | This Criterion is not applicable as the Entity is not located in a country where the right to Freedom of Association and Collective Bargaining is restricted. |

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| 10.2a Child Labour (minimum age) | Conformance | <p>The Entity does not engage in nor support Hazardous Child Labour and complies with related national and international law.</p> <p>The hiring procedure implemented by the Human Resources department guarantees that the mandatory documents for verifying right-to-work and legal age to work are gathered and checked. The youngest person on site is a 19 year old apprentice. Contracts were reviewed, showing the employees' date of birth.</p> <p>This is backed by the Entity's Human Rights policy based on internationally recognised principles including the International Labour Organisation (ILO) Conventions C138 and C182.</p> |
| 10.2b Child Labour (hazardous) | Conformance | <p>The Entity does not engage in nor support the Worst Forms of Child Labour and complies with related national and international law.</p> <p>The hiring procedure implemented by the Human Resources department guarantees that the mandatory documents for verifying right-to-work and legal age to work are gathered and checked. The youngest person on site is a 19 year old apprentice. Contracts were reviewed, showing the employees' date of birth.</p> <p>This is backed by Entity's Human Rights policy based on internationally recognised principles including the International Labour Organisation (ILO) Conventions C138 and C182.</p> |
| 10.2c Child Labour (worst forms) | Conformance | <p>The Entity does not engage in nor support the Worst Forms of Child Labour and complies with related national and international law.</p> <p>The hiring procedure implemented by the Human Resources department guarantees that the mandatory documents for verifying right-to-work and legal age to work are gathered and checked. The youngest person on site is a 19 year old apprentice. Contracts were reviewed, showing the employees' date of birth.</p> <p>This is backed by the Entity's Human Rights policy based on internationally recognised principles including the International Labour Organisation (ILO) Conventions C138 and C182.</p> |
| 10.3a Forced Labour (human trafficking) | Conformance | <p>The Entity does not engage in nor support the use of Forced Labour, or Human Trafficking. The hiring procedure and Company Rules (Réglement Intérieur) prevent this, as well as the Entity's Human Rights policy based on internationally recognised principles (the United Nations Guiding Principles for Business and Human Rights and ILO Conventions).</p> <p>This was also confirmed by interviews with Workers</p> |

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| | | and a representative from the local employment agency. |
| 10.3b Forced Labour (deposits, fees, advances) | Conformance | <p>The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers. The hiring procedure and Company Rules (Réglement Intérieur) prevent this, as well as the Entity's Human Rights policy based on internationally recognised principles (the United Nations Guiding Principles for Business and Human Rights and the International Labour Organisation Conventions).</p> <p>This was also confirmed by interviews with Workers and a representative from the local employment agency.</p> |
| 10.3c Forced Labour (migrant workers) | Conformance | <p>The Entity does not engage in nor support the use of Forced Labour, nor employs Migrant Workers. The hiring procedure and Company Rules (Réglement Intérieur) prevent this, as well as the Entity's Human Rights policy based on internationally recognised principles (the United Nations Guiding Principles for Business and Human Rights and the International Labour Organisation Conventions). This was also confirmed by interviews with Workers and a representative from the local employment agency.</p> |
| 10.3d Forced Labour (debt bondage) | Conformance | <p>The Entity does not engage in nor support the use of Forced Labour, nor holds Workers in Debt Bondage. The hiring procedure and Company Rules (Réglement Intérieur) prevent this, as well as the Entity's Human Rights policy based on internationally recognised principles (the United Nations Guiding Principles for Business and Human Rights and the International Labour Organisation Conventions). This was also confirmed by interviews with Workers and a representative from the local employment agency.</p> |
| 10.3e Forced Labour (freedom of movement) | Conformance | <p>The Entity does not engage in nor support the use of Forced Labour, nor unreasonably restricts the freedom of movement of Workers. The hiring procedure and Company Rules (Réglement Intérieur) prevent this, as well as the Entity's Human Rights policy based on internationally-recognised principles (the United Nations Guiding Principles for Business and Human Rights and the International Labour Organisation Conventions). This was also confirmed by interviews with Workers and a representative from the local employment agency.</p> |

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| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | <p>The Entity does not engage in nor support the use of Forced Labour, nor retain original copies of Workers' identity papers, work permits, travel documents or training certificates;</p> <p>The hiring procedure and Company Rules (Réglement Intérieur) prevent this, as well as the Entity's Human Rights policy based on internationally recognised principles (the United Nations Guiding Principles for Business and Human Rights and the International Labour Organisation Conventions). This was also confirmed by interviews with Workers and a representative from the local employment agency.</p> |
| 10.3g Forced Labour (freedom to terminate employment) | Conformance | <p>The Entity does not engage in nor support the use of Forced Labour, nor deny Workers the freedom to terminate their employment at any time without penalty.</p> <p>The hiring procedure and Company Rules (Réglement Intérieur) prevent this, as well as the Entity's Human Rights policy based on internationally-recognised principles (the United Nations Guiding Principles for Business and Human Rights and the International Labour Organisation Conventions). This was also confirmed by interviews with Workers and a representative from the local employment agency.</p> |
| 10.4 Non-Discrimination | Conformance | <p>The Entity has procedures in place to ensure equal opportunities and prevent Discrimination. The mandatory display panels make available to staff the related texts of law as per legal requirement: articles 225-1 to 225-4 of the penal code prohibiting and sanctioning all forms of Discrimination; articles 222-33 and 222-33-2 of the penal code about sexual and moral harassment; and articles L3221-1 to L3221-7 about equality of pay between men and women.</p> <p>The hiring procedure prohibits and prevents Discrimination, backed by the Entity's Human Rights policy based on internationally recognised principles (the United Nations Guiding Principles for Business and Human Rights and ILO Conventions).</p> <p>This was also confirmed by interviews with Workers and a representative from the local employment agency.</p> |
| 10.5 Communication and engagement | Conformance | <p>The Entity has established multiple communication channels between Workers and management: an elected employee representatives' committee (CSE); short standing meetings (causeries); training sessions; Human Resources office's drop-in sessions, and for confidential reporting, The Entity operates a whistle-</p> |

| CRITERION | RATING | COMMENT |
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| | | blower line, with a guarantee of protection of the identity of the whistle-blower. |
| 10.6 Disciplinary practices | Conformance | The mandatory display of workplace information (Affichage obligatoire) includes the disciplinary rules and scale of sanctions, as part of Company Rules (Règlement Intérieur). This states that Aludium France does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. The Entity has nominated an anti-harassment representative, as per legal requirements, and Workers have multiple ways of reporting potential issues. |
| 10.7a Remuneration (living wage) | Conformance | The Entity pays Workers a living wage above the legal minimum and the levels are listed in the Collective Bargaining agreement. Any deductions are in line with legal requirements. Overtime is compensated at a premium. Various bonuses and compensations are granted to Workers. |
| 10.7b Remuneration (method of payment) | Conformance | Wages and benefits are paid monthly, as verified on payslips, on the paid software and in Worker interviews. A calendar of payslips is displayed for Workers in the break room. |
| 10.8 Working Time | Conformance | Working hours comply with national laws and with the Collective Bargaining agreement of the local Metal sector, "Convention Collective de la Métallurgie Midi-Pyrénées". Whenever there is work above the legal limit of thirty-five hours per week, Workers are given recuperation days as compensation. Overtime hours are voluntary, as confirmed in employees' files, payslips and interviews. |
| PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY | | |
| 11.1a Occupational Health and Safety (OH&S) Policy (policy) | Conformance | The Entity has a policy covering Quality, Health, Safety and Energy (QHSEE), signed by the Director. The Entity also holds ISO45001 certification and has no open major non-conformities in its latest audit report. The certificate is valid until March 2024. |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors) | Conformance | The Entity's Quality, Health, Safety and Energy (QHSEE) Policy applies to everyone present in any area or activities under the entity's control. There is an appointed manager for QHSEE. Initial Health and Safety training is carried out on the first days of the recruit's arrival and then refreshed annually. |

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| | | The Entity's Health and safety risk assessment is exhaustive and aligned with legal requirements. |
| 11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards) | Conformance | The Entity's policy contains a commitment to comply with Applicable Laws on Workers' health and safety. Additionally, the policy states a commitment to train and empower Workers by making safety a priority, involving team members in setting targets, evaluating and enhancing competencies, and leading by example by showing discipline in the application of the rules. |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work) | Conformance | The Entity's policy states the right of Workers to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. Awareness of this was confirmed in Worker's interviews. |
| 11.2 OH&S Management System | Conformance | The Entity is ISO45001 certified and has no open major non-conformities in its latest audit report. The certificate is valid until March 2024. |
| 11.3 Employee engagement on health and safety | Conformance | The Entity has established multiple communication channels for Health and Safety topics: an elected employee representatives' committee (CSE); short standing meetings (causeries); training sessions; Human Resources office's drop-in sessions, and for confidential reporting, a whistle-blower line with a guarantee of protection of the identity of the whistle-blower. |
| 11.4 OH&S performance | Conformance | The Entity's performance on health and safety is presented in the Management Review (Comité de Direction - CODIR) every month; examples of topics reviewed are updates to the health and safety risk assessment and universal indicators such as recordable cases. The Human Resources Manager and the Health, Safety and Environment Manager are responsible for the manual input into the support material for the presentation, root cause analysis and corrective actions. |

Document Control and Version History

| Revision | Date | Notes |
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| 0 | 18 April 2023 | Initial Certification Audit – Full Certification |