
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CONSTELLIUM MUSCLE SHOALS (CMS LLC)

CERTIFICATE
NUMBER

290

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

18 AUGUST 2023

DATE OF EXPIRY

17 AUGUST 2026

CERTIFIED SINCE

18 AUGUST 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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

CERTIFICATION SCOPE

Muscle Shoals, Alabama (USA) including the Element 13 used beverage can recycling facility, with the main operations of delacquering, melting, casting and storage, Alloys Plant, which produces coils of aluminium sheet and Sheffield Facility, which produces slits coils for tabstock; and Bowling Green, Kentucky (USA) which produces flat rolled aluminium auto body sheet products.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME Constellium

ENTITY NAME Constellium Muscle Shoals (CMS LLC)

CERTIFICATION SCOPE Muscle Shoals, Alabama (USA) including the Element 13 used beverage can recycling facility, with the main operations of delacquering, melting, casting and storage, Alloys Plant, which produces coils of aluminium sheet and Sheffield Facility, which produces slits coils for tabstock; and Bowling Green, Kentucky (USA) which produces flat rolled aluminium auto body sheet products.

SUPPLY CHAIN ACTIVITIES

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

ASI STANDARD Performance Standard V2

AUDIT TYPE

- Initial Certification Audit

AUDIT FIRM Bureau Veritas Certification

AUDIT DATE

- 14 March – 13 April 2023

AUDIT REPORT SUBMISSION

- 30 May 2023

AUDIT SCOPE The audit scope covers the operations at Constellium Muscle Shoals, Alabama, USA and Constellium Bowling Green, Kentucky, USA.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

AUDIT OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

18 August 2023 – 17 August 2026

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

17 August 2024

CERTIFICATE
NUMBER

290

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity maintains an environmental, health and safety compliance obligations matrix that was last updated in September 2022. The Entity issues an annual Compliance Statement that is validated by a Third Party auditing firm.</p> <p>However, a gap in waste management was identified related to the Resource and Recovery Conservation Act (RCRA) classification of a current waste stream that was reclassified as a reuse stream and the associated change in the handling rules were not clearly established by the Entity.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented a global Code of Conduct for employees and a Supplier Code of Conduct which includes a Global-Anti Corruption policy that prohibits any form of bribery or corruption.</p>
1.3 Code of Conduct	Conformance	<p>At the corporate level, Constellium has developed and implemented a Code of Conduct Policy that identifies common compliance issues to provide clear guidance to resources to employees. The Code of Conduct is communicated to all employees at the Entity as part of the on-boarding process.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity's Muscle Shoals and Bowling Green Facilities maintain an Environment, Health and Safety (EHS) Policy for their site. Both sites are certified against ISO 14001 and ISO 45001 and the Policies outline the Entity's commitment to maintaining a safe workplace, fulfilling compliance obligations, integrating sustainability into business practices, and continuous improvement.</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity's sites are certified against both ISO 14001 and ISO 45001. The leadership responsibilities specific to EHS are outlined in the EHS Manual. There are dedicated resources for the implementation of the EHS requirements.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The EHS Policy at both sites is communicated during the on-boarding of new employees and posted in several locations across the sites.</p>
2.2 Leadership	Conformance	<p>The Entity has designated the Director of Environmental and Sustainability as the lead for</p>

CRITERION	RATING	COMMENT
		ensuring implementation of the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity maintains an Environmental Management System that has been certified against the requirements of ISO 14001:2015.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity's sites are certified against ISO 14001:2015 and ISO 45001:2018. In addition, the Entity has processes and procedures in place that address Human and Labour Rights, community engagement and sustainability. Social management programs are outlined in the Constellium Sustainability Report 2022, pages 40 – 47: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf
2.4 Responsible Sourcing	Conformance	The Entity has implemented the Constellium Supplier Code of Conduct, and all suppliers are expected to agree to the terms and must sign-off before being approved as a supplier. This Code is relevant for all suppliers, consultants, contractors and business partners.
2.5 Impact Assessments	Conformance	As part of the Due Diligence process for New Projects or Major Changes to existing Facilities, the Entity evaluates potential impacts to employees and to the Communities in which they operate.
2.6 Emergency Response Plan	Conformance	The Entity's Facilities each have emergency response procedures in place and have on-site trained emergency response teams. Drills have been conducted at least annually and are documented.
2.7 Mergers and Acquisitions	Conformance	All merger and acquisitions and the associated Due Diligence processes are managed at the Constellium Corporate level.
2.8 Closure, Decommissioning and Divestment	Conformance	All closure and divestment processes are managed at the Constellium Corporate level with no site involvement. There have been no closure activities at the Bowling Green or Muscle Shoals locations.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Constellium Group publishes a formal Sustainability Report in conformance with the

CRITERION	RATING	COMMENT
		Global Reporting Initiative (GRI) Standard annually. The current report is available at: https://www.constellium.com/sustainability/policies-reports-and-certifications
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions as outlined in the GRI 307 section of the Constellium Sustainability Report.
3.3a Payments to governments (legal and contractual)	Conformance	The anti-Corruption Policy is outlined in the Constellium Code of Conduct. The Entity does not tolerate any form of Corruption, in line with all applicable national laws.
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 established an accessible Complaints Resolution Mechanism to address Stakeholder complaints, grievances and requests for information relating to its operations. The Constellium Group maintains an Integrity Hotline that is an independent service that allows internal and external Stakeholders to communicate confidentially, and is available 24/7 via toll-free telephone numbers.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Life Cycle Assessment (LCA) information is included in the Constellium Sustainability Report 2022, available at: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Constellium Corporate Sustainability team published Third Party verified Life Cycle Assessments (LCA) in April 2015 for can sheet and automotive sheet and are currently in the process of renewing these LCAs. A timeline for completion of the updated LCAs was presented during the audit with the completion scheduled by the end of 2023.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Constellium Corporate Sustainability team published Third Party verified LCAs in April 2015 for can sheet and automotive sheet, and are currently in the process of renewing these LCAs and then

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		publish in 2023. LCA information is included in the Constellium Sustainability Report 2022, available at: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf
4.2 Product design	Conformance	The Entity uses recycled material in the manufacture of their can sheet and automotive sheet that is produced at the Muscle Shoals Facility and then coated at the Bowling Green Facility. Targets for the amount of recycled Aluminium that is used in their Products have been established. This information is outlined in the Sustainability Report.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity is working with beverage can makers, fillers, brewers, and tooling manufacturers to design high-recycled content alloys for their Products. These initiatives are described in the Constellium Sustainability Report.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Muscle Shoals site sorts scrap by alloy type so it can be reintroduced to the front of the process in a systematic way. They maintain a daily recovery report that shows the recycling rates. At Bowling Green, all scrap material is collected and sent off-site for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity is partnering with their customers to find solutions for the sorting and segregating of scrap and to develop End Products that incorporate scrap material and are easier to recycle. This information is outlined in the Constellium Sustainability Report.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Constellium Group is engaged with global, state and local entities to increase the amount of Aluminium that is recycled across the supply chain. They have established strategies that engage key Stakeholders, markets and product lines including both automotive and beverage cans which are the primary Products of Muscle Shoals and Bowling Green.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	At Group level, Constellium calculates its Greenhouse Gas (GHG) emissions (Scope 1, 2 and 3), including that of the Entity, and reports these

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		<p>data in the annual submission to the CDP Climate Change program, available at: www.cdp.ne</p> <p>The Muscle Shoals site also discloses energy use and GHG emissions annually, as required by the US Environmental Protection Agency (EPA). The most recent submittal was March 22, 2022.</p>
5.2 GHG emissions reductions	Conformance	<p>Constellium has established the GHG emissions reduction goal of a 30% reduction by 2030. Both the Muscle Shoals and Bowling Green sites have identified projects that will support this corporate wide reduction goal.</p> <p>The GHG emissions reduction targets are published in the annual Sustainability Report: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf</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.
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	Both the Muscle Shoals and Bowling Green Facilities have a site specific air emissions permit. The permits require the tracking and reporting of air emissions on an annual basis.
6.2 Discharges to Water	Conformance	Both the Muscle Shoals and Bowling Green Facilities have a site specific wastewater permit, which outlines discharge limits for the pre-treatment of industrial wastewater prior to discharge to the local or privately owned treatment facilities.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Both sites have implemented and maintained an Emergency Response Plan, which outlines the requirements for responding to Spills. The Plan outlines effective responses, including control and recovery, for a range of potential emergency events including Spills and Leakage. The program includes employee orientation training and more detailed training for employees who have spill response

CRITERION	RATING	COMMENT
		assignments. In addition, each site maintains a Spill Response Procedure which is reviewed annually.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has established procedures to manage any Spills or Leakage. These procedures are outlined in each site's Spill Prevention, Control and Countermeasure (SPCC) Plan and also in site specific procedures.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed and implemented emergency Spill response and reporting procedures.
6.4b Reporting of Spills (regular reporting)	Conformance	Both sites evaluate Spills to determine if regulatory reporting thresholds are exceeded. If so, spill reports would be submitted as required by regulation. Any significant Spills would be included in the annual Sustainability Report.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a Waste management and reporting strategy with goals specific to the reduction of Waste, as outlined in the Constellium Sustainability Report. Waste generation is tracked at each Facility and reported monthly to the corporate sustainability team.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has implemented a Waste management and reporting strategy with goals specific to the reduction of Waste, as outlined in the Constellium Sustainability Report. Waste generation is tracked at each Facility and reported monthly to the corporate sustainability team. Waste generation volumes are disclosed in regulatory reports and/or in the Constellium Sustainability Report, page 38: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf
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.

CRITERION	RATING	COMMENT
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.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity's Muscle Shoals site currently collects Dross and sends it to a third party Dross processor. The separated Aluminium is returned to the Entity for re-introduction into the melt furnaces.
6.8b Dross (recycling)	Conformance	The Entity's Muscle Shoals site currently collects Dross and sends it to a third party Dross processor. The separated Aluminium is returned to the Entity for re-introduction into the melt furnaces.
6.8c Dross (review of alternatives)	Conformance	The Entity's Muscle Shoals site currently collects Dross and sends it to a third party Dross processor. The separated Aluminium is returned to the Entity for re-introduction into the melt furnaces.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity withdraws water from a variety of sources for use in their manufacturing processes. Water usage is measured at least monthly via meter readings and the tracking of utility bills.
7.1b Water assessment (risk assessment)	Conformance	The Entity uses the Aqueduct water modelling tool to evaluate water-related risks. Muscle Shoals is ranked as low risk and Bowling Green as medium risk.
7.2a Water management (management plans)	Minor Non-Conformance	The Entity uses the Aqueduct water modelling tool to evaluate water-related risks and to determine water management needs. The Muscle Shoals site was determined to be a low risk and Bowling Green

CRITERION	RATING	COMMENT
		<p>as a medium risk. Water usage information is presented in the Sustainability Report. https://www.constellium.com/sustainability/policies-reports-and-certifications However, the Entity has not yet established time-bound targets for water usage for either site.</p>
7.2b Water management (monitoring)	Conformance	<p>The Entity's sites monitor water usage on a monthly basis by reading water withdrawal meters and tracking water utility bills. Water usage is monitored as part of Constellium's monthly sustainability scorecard. The Entity's compliance with current water permit requirements is monitored and reported to the regulatory agencies as required.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Constellium Group discloses group-level water usage in the Sustainability Report and on their website: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity had a third party conduct a Biodiversity assessment in April 2022. There were no high risks identified that would require any action plans.</p>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	<p>This Criterion is not applicable, as the third party Biodiversity assessment determined there were no high risks identified that would require any action plans.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	<p>This Criterion is not applicable, as the third party Biodiversity assessment determined there were no high risks identified that would require any action plans.</p>
8.2c Biodiversity management (reporting)	Not Applicable	<p>This Criterion is not applicable, as the third party Biodiversity assessment determined there were no high risks identified that would require any action plans. Biodiversity management is included in the Constellium Sustainability Report: https://res.cloudinary.com/constellium/image/upload/v1678721325/PDF%20documents/Brochures%20and%20Reports/Business%20and%20Sustainability%20Reports/Reports%20and%20Brochure%202022-23/Sustainability_Report_2022_-_En_jwbvej.pdf</p>

CRITERION	RATING	COMMENT
8.3 Alien Species	Conformance	There is no evidence of Alien Species at the Entity's sites and the Biodiversity assessment determined the risk of Alien Species being introduced as low.
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, as part of the Constellium Group, is a signatory to the United Nations Global Compact. Constellium is a signatory to the United National Global Compact. The Constellium Human Rights Policy and Labor Practices outlined in the Code of Conduct includes their commitment to act in accordance with UN Guiding Principles on Business and Human Rights and other internationally recognised standards.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has undertaken a Human Rights risk assessment to identify any potential Human Rights risks specific to their operations. Any at-risk supplier is required to undergo an EcoVadis assessment every three years, which addresses Human Rights, environmental, health, safety and business ethics.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has implemented relevant Constellium Policies and procedure for employees to report Discrimination, harassment, or retaliation. Employees are able to report any potential Discrimination, harassment, or retaliation to his or her supervisor, the Human Resources Department, any member of management, or call the Constellium Integrity Hotline.
9.2 Women's Rights	Conformance	The Entity compensates all employees equitably based on their competitive labour market data, performance levels and contributions to Constellium's success while ensuring adherence to

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		all Applicable Laws and regulations. The Entity's corporate headquarters has established a taskforce for gender diversity and actively recruits women for all open positions.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as the Entity's sites do not impact Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as the Entity's sites do not impact Indigenous Peoples.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as the Entity's sites are not located on, or near a cultural or sacred heritage site.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there have been no Resettlements resulting from the Entity's operations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there have been no Resettlements resulting from the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity supports and promotes community projects and has established initiatives with the local Chamber of Commerce and local university.
9.7b Local Communities (impacts)	Conformance	The relevant interested parties, their needs and expectations and associated risks and opportunities are documented using the EHS Business Context Worksheet for both the Bowling Green and Muscle Shoals sites. The needs and expectations of interested parties are considered during the annual planning process. An Integrity Hotline is available to members of the community to report any complaint.
9.7c Local Communities (livelihoods)	Conformance	The relevant interested parties, their needs and expectations and associated risks and opportunities are documented using the EHS Business Context Worksheet for both the Bowling Green and Muscle Shoals sites. The interested parties' needs and expectations are considered in the annual EHS planning process. An Integrity Hotline is available to members of the public to report any complaint.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity does not operate in a Conflict-Affected or High-Risk Area, nor sources materials from such an area. The Entity evaluates their locations and suppliers.

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9.9 Security practice	Conformance	The Entity utilises a third party for security services at each location. The security provider is trained in and must adhere to Constellium's Code of Conduct.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity protects the rights of employees to join, or not join, a labour union or work council, without fear of intimidation or reprisal or any type of Harassment. The Muscle Shoals location has Collective Bargaining Agreements in place with the United Steel Workers and Operating Engineers. Bowling Green is presently a non-Union site.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity implements a Human Rights and Labor Practices Policy that protects the rights of employees to join a labour union. At Muscle Shoals there are two Collective Bargaining Agreements in place, with the United Steelworkers and Operating Engineers. Bowling Green is presently a non-Union Site.
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 adheres to all regulations related to Child Labour laws and compulsory or Forced Labour, and does not employ individuals under the age of 18.
10.2b Child Labour (hazardous)	Conformance	The Entity adheres to all regulations related to Child Labour laws and compulsory or Forced Labour, and does not employ individuals under the age of 18.
10.2c Child Labour (worst forms)	Conformance	The Entity adheres to all regulations related to Child Labour laws and compulsory or Forced Labour, and does not employ individuals under the age of 18.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has implemented the Constellium Human Rights Policy, Code of Conduct and Supplier Code of Conduct, which identifies their commitment to implement measures to prevent and manage the risk of Human Trafficking or modern slavery. This is also a requirement for suppliers in the Entity's supply chain.
10.3b Forced Labour (deposits, fees, advances)	Conformance	As outlined in the Constellium Code of Conduct, compulsory or Forced Labour is forbidden within the Entity and for any third parties doing business with the Entity. The Code of Conduct is available at:

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		https://res.cloudinary.com/constellium/image/upload/v1663769849/PDF%20documents/Governance/constellium_codeofconduct-2019-en-web_r0lnzg.pdf
10.3c Forced Labour (migrant workers)	Conformance	As outlined in the Constellium Code of Conduct, compulsory or Forced Labour is forbidden within the Entity and for any third parties doing business with the Entity.
10.3d Forced Labour (debt bondage)	Conformance	As outlined in the Constellium Code of Conduct, compulsory or Forced Labour is forbidden within the Entity and for any third parties doing business with the Entity.
10.3e Forced Labour (freedom of movement)	Conformance	As outlined in the Constellium Code of Conduct, compulsory or Forced Labour is forbidden within the Entity and for any third parties doing business with the Entity.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	As outlined in the Constellium Code of Conduct, compulsory or Forced Labour is forbidden within the Entity and for any third parties doing business with the Entity.
10.3g Forced Labour (freedom to terminate employment)	Conformance	As outlined in the Constellium Code of Conduct, compulsory or Forced Labour is forbidden within the Entity and for any third parties doing business with the Entity.
10.4 Non-Discrimination	Conformance	The Entity has implemented the corporate Code of Conduct. Employees receive diversity and anti-Discrimination training as part of onboarding and annual compliance training.
10.5 Communication and engagement	Conformance	The Entity's process for grievances is outlined in each of the Collective Bargaining Agreements and in the Human Resources (HR) Manual. This process is followed to address any employee complaints. In addition, an integrity hotline is available that allows for the reporting of a concern or complaint that is then investigated following a defined procedure.
10.6 Disciplinary practices	Conformance	The Entity has implemented the Constellium corporate Policies and procedures for Disciplinary actions. These are outlined in the Human Resources (HR) Manual and in the case of Muscle Shoals, disciplinary procedures are also outlined in the Collective Bargaining Agreements.

CRITERION	RATING	COMMENT
10.7a Remuneration (living wage)	Conformance	The Entity pays its employees on a bi-weekly payroll cycle in accordance with applicable labour laws.
10.7b Remuneration (method of payment)	Conformance	The Entity makes wage payments that are timely via electronic deposits, in legal tender and are fully documented.
10.8 Working Time	Conformance	The Entity complies with the applicable labour laws specific to Working Time including Overtime and holiday pay. This is outlined in the Human Resources (HR) Manual and/or in the Collective Bargaining Agreements.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented a Health and Safety Policy that outlines their commitment to maintaining a safe workplace.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Health and Safety Policies and procedures are applicable to site Visitors and Contractors as well as employees. Contractors and Visitors are required to complete a safety orientation and training prior to being allowed on-site.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Minor Non-Conformance	The Entity's Policy contains a commitment to comply with Applicable Laws on Workers' health and safety. However, one occurrence of missing regulatory safety training was identified during the audit.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity ensures that employees have the right to stop work if they feel it is unsafe. This is stated in the Human Resources (HR) Manual.
11.2 OH&S Management System	Minor Non-Conformance	The Entity's sites have implemented an EHS Management System that is currently certified against the requirements of ISO 14001:2015 Environmental Management Systems and ISO 45001:2018 Occupational Health and Safety Management Systems. The details of the Management Systems are outlined in each site's EHS Management Systems Manual and includes the Entity's policies, procedures, plans, resources, processes, and the delineation of roles and responsibilities. However, during the on-site audit, a gap was identified in the management of corrective actions identified after inspections conducted by a certified third party. At the time of the audit, the Bowling

CRITERION	RATING	COMMENT
		Green site was in the process of developing a system to address these deficiencies.
11.3 Employee engagement on health and safety	Conformance	The Entity has established processes to assure employees are able to participate and provide input specific to any health or safety concerns. These processes are described in the EHS Manuals and are also part of the daily operational meetings.
11.4 OH&S performance	Conformance	The Entity monitors and measures its Health and Safety performance and publishes a scorecard for each business unit highlighting leading and lagging metrics as well as necessary corrective action plans. Health and Safety data is also published as part of Constellium's Sustainability Report.

Document Control and Version History

Revision	Date	Notes
0	18 August 2023	Certification Audit – Full Certification