

ASI CERTIFICATION  
PERFORMANCE  
STANDARD



PRESENTED TO

# Aluminerie Alouette

CERTIFICATE NUMBER

85

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

BNQ

DATE OF ISSUE

29 JANUARY 2024

DATE OF EXPIRY

28 JANUARY 2027

CERTIFIED SINCE

13 JULY 2020

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

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

# 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"><li>Aluminium Smelting</li><li>Casthouses</li></ul>
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (9 – 13 December 2019)</li><li>Surveillance Audit (20 October – 19 November 2022)</li><li>Re-Certification Audit (13 – 15 December 2022 and 6 – 26 June 2023)</li><li>Re-Certification and Scope Change Audit (14 - 16 November 2023)</li></ul>
AUDIT FIRM	BNQ
AUDIT DATE	<ul style="list-style-type: none"><li>9 – 13 December 2019 (Initial Certification Audit)</li><li>20 October – 19 November 2022 (Surveillance Audit)</li><li>13 – 15 December 2022 (on-site) and 6 – 26 June 2023 (remote) (Re-Certification Audit)</li><li>14 – 16 November 2023 (Re-Certification and Scope Change Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>24 June 2020 (Initial Certification Audit)</li><li>10 December 2022 (Surveillance Audit)</li><li>27 June 2023 (Re-Certification Audit)</li><li>12 December 2023 (Re-Certification and Scope Change Audit)</li></ul>
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"><li>Aluminium Smelting</li><li>Casthouses</li></ul> <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"><li>Aluminium Smelting</li></ul>

- Casthouses

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.

Re-Certification Audit (13 – 15 December 2022 (on-site) and 6 – 26 June 2023 (remote))

The audit scope covered the operations, maintenance and services required for the production of primary aluminium.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouses

All relevant criteria in the ASI Performance Standard were included in the audit scope. The on-site auditing activities were undertaken to integrate into the Entity's ISO standards audit schedule. The remote activities, including remote sessions and videoconferencing stakeholder interviews, were delayed due to the Force Majeure situation associated with nearby forest fires.

Re-Certification and Scope Change Audit (14 – 16 November 2023)

The audit scope covered the operations, maintenance and services required for the production of primary aluminium.

Supply chain activities included in the audit scope:

- Aluminium Smelting
- Casthouses

All applicable 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 company's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION PERIOD

29 January 2024 – 28 January 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

28 January 2027

CERTIFICATE NUMBER

85



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

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## ENTITY OVERVIEW

Inaugurated in 1992, Aluminerie Alouette is an independent aluminium producer. With over 900 employees and an annual production capacity of nearly 630,000 tonnes of primary aluminium, the Entity is the largest private employer in Sept-Îles (province of Quebec in Canada) and the largest aluminium smelter in America. The Entity is surrounded by the Sept-Îles Bay and the St-Lawrence River, approximately six kilometres southwest of the municipality. The Entity is located in an industrial area.

The Entity's ownership consists of the following five shareholders: AMAG Austria Metall AG (Austria, 20%), Hydro Aluminium (Norway, 20%), Investissement Québec (Canada, 6.67%), Marubeni Metals & Minerals (Japan, 13.33%) and Rio Tinto (Canada, 40%).

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	High	High	Medium	HIGH
<b>RISKS</b>	Medium	High	High	HIGH
<b>PERFORMANCE</b>	High	High	Medium	HIGH
<b>OVERALL</b>		<b>HIGH</b>		

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
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. The Entity is also supported by a consultancy when negotiating large-scale special contracts. A financial audit is undertaken both quarterly and annually. Legal compliance matters are discussed through the Owners Committee's annual meeting as part of a consortium. Representatives from all the Entity's major departments sign a compliance certificate on an annual basis which is addressed to the members and alternate members of the Owners Committee. This certificate is a declaration of conformity relating to labour law, fiscal legislation, environmental and Occupational Health and Safety (OH&amp;S) legislation.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has implemented various anti-Corruption measures, including the implementation of two Codes of Ethics and Conduct – one for business partners and one for employees. The Codes include principles relevant to environmental, social and governance performance, and are available at: <a href="https://www.alouette.com/en/our-commitment/governance">https://www.alouette.com/en/our-commitment/governance</a></p> <p>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. A whistleblowing mechanism has been implemented, supported by a neutral and impartial external firm.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented various anti-Corruption measures, including the implementation of two Codes of Ethics and Conduct – one for business partners and one for employees. The Codes include principles relevant to environmental, social and governance performance, and are available at: <a href="https://www.alouette.com/en/our-commitment/governance">https://www.alouette.com/en/our-commitment/governance</a></p> <p>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.</p> <p>The Code of Conduct is revised at least every five years or as required if there is any change to business or any indication of a control gap.</p>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented organisational practices as well as Policies that are consistent with required environmental, social and governance practices. These Policies include an Occupational Health and Safety (OH&amp;S) Policy, an Environmental Policy, a Social Responsibility Policy, a Responsible Energy Management Policy, a Quality Management Policy, and an Information Security Management Policy. All policies are signed by the President and Chief Executive Officer (CEO).</p> <p>The review and approval of the Policies are undertaken by the Executive and Management under a defined frequency. The implementation of Policies and procedures are validated via audit</p>

CRITERION	RATING	COMMENT
		<p>processes (internal and external).</p> <p>The Entity communicates its ESG Policies both physically and electronically throughout the Entity, via the induction of new employees and Contractors, through several awareness initiatives (regular meetings) and via refresher training opportunities.</p> <p>The Entity's ESG commitment is available at:  <a href="https://www.alouette.com/en/our-commitment/esg-vision">https://www.alouette.com/en/our-commitment/esg-vision</a></p> <p>The Policies are available internally on the employee Portal (an Intranet) and externally (in French only) at:  <a href="https://www.alouette.com/en/our-commitment/governance/company-policy-directory">https://www.alouette.com/en/our-commitment/governance/company-policy-directory</a></p>
2.2a-c Leadership	Conformance	<p>The Vice President of Operations and Maintenance is the primary contact for ASI correspondence 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 Entity's Chief Financial Officer.</p> <p>This role is also supported by an internal ASI Implementation Committee which includes representatives from Health, Safety and Environment, Communications, Technology and operational excellence, Management Systems, Compliance, Human Resources and Risk Management functional areas</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 to the ISO 14001 Standard since 2005. The valid ISO 14001 certificate is available at:  <a href="https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=ALOUETTE&amp;noCertificat=#recherche_rcc_input">https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=ALOUETTE&amp;noCertificat=#recherche_rcc_input</a></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 their commitment to work.</p> <p>The management of OH&amp;S performance of partners, subcontractors and Contractors is integrated into the Entity's current activities.</p> <p>The Entity has been ISO 14001 and OHSAS 18001 certified since 2005 and transitioned to ISO 45001 in December 2020. Refer to the valid ISO 45001 certificate at:  <a href="https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=ALOUETTE&amp;noCertificat=#recherche_rcc_input">https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=ALOUETTE&amp;noCertificat=#recherche_rcc_input</a></p> <p>The Entity has established a working structure in partnership with the local First Nations community. These address aspects including workforce development, community support and economic spin-offs.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Responsible Sourcing Policy (The Partner Code of Conduct), 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>The majority of the Entity's current Alumina supply is sourced from ASI Certified suppliers. These supplies are managed by the Consortium Owners' Alumina Committee members who are also ASI Performance</p>

CRITERION	RATING	COMMENT
		Standard and Chain of Custody Certified, including Rio Tinto Aluminium, Hydro Aluminium and AMAG Austria Metall AG. The Entity's Partner Code of Conduct (which is the equivalent of a Responsible Sourcing Policy) is available at: <a href="https://www.alouette.com/en/our-commitment/governance">https://www.alouette.com/en/our-commitment/governance</a>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>There are no planned Major Changes or New Projects that may trigger an Environmental and Social Impact Assessment. To date, the Entity's Smelter and Facilities have been constructed in two (2) Phases after extensive legal Impacts Assessment processes.</p> <p>The Entity has demonstrated its ability to conduct environmental, social, cultural and Human Rights Impact Assessments for New Projects or Major Changes to existing Facilities. The Impact Assessment studies satisfy the legal requirements as the government then authorised the construction and extension of the smelter and related Facilities.</p> <p>The management of operational changes, significant projects or major modifications to existing Facilities are governed by a defined process that includes global and comprehensive risk analysis, including impacts on First Nations, if any.</p> <p>Further information is available at: <a href="https://www.alouette.com/en/our-commitment/esg-vision">https://www.alouette.com/en/our-commitment/esg-vision</a> (Entity's ESG commitment) and <a href="https://www.alouette.com/en/sustainability/actions">https://www.alouette.com/en/sustainability/actions</a> (Sustainability Actions).</p> <p>The Entity's annual Sustainable Development Reports also provide information to Stakeholders on ESG aspects and upcoming events.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	The Criterion is not applicable as there are no planned Major Changes or New Projects that would trigger a Human Rights Impact Assessment.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed site specific Emergency Response Plans (ERP) in collaboration with potentially affected Stakeholder groups such as Local Communities, Workers and their representatives, and relevant agencies.</p> <p>The Alouette ERP conforms to ISO 14001 and ISO 45001 requirements. Real emergency events have occurred in recent months (including a tower fire, major forest fires, roadblocks and an electrical failure) and the ERP deployment has been sufficient to prevent major EHS impacts, or significant Material loss.</p> <p>ERPs are shared with relevant municipal, provincial and federal authorities and with the geographically closest industrial facilities and a summary of the ERP is shared on the Entity's website at: <a href="https://www.alouette.com/en/our-company/employees/health-and-safety">https://www.alouette.com/en/our-company/employees/health-and-safety</a></p>
2.8a-d Suspended Operations	Conformance	<p>Various tools, processes and procedures are available and would be used in the event of major events creating Material ESG impacts, affecting operations or requiring them to be suspended.</p> <p>These processes are components of the Entity's Resilience Plan. A major roadblock and a major electric failure that occurred in December 2022 demonstrate that the deployment of the Resilience Plan is adequate.</p>



CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	The Entity's Due Diligence process for Mergers and Acquisitions is managed via the Owners' Agreement that governs the ESG management of assets.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Due Diligence process for Closure or Decommissioning considers environmental, social and governance aspects. The Owners' Agreement contains clauses governing the management of assets, in particular, the decommissioning of equipment in accordance with applicable environmental requirements. The Entity's legal Impact Assessment process also includes a decommissioning plan and public consultation of any Affected Populations and Organisations.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its Material environmental, social and economic impacts in its annual Sustainability Reporting process. The 2021 Sustainable Development Report is available at: <a href="https://www.alouette.com/environnement/rapports-de-developpement-durable">https://www.alouette.com/environnement/rapports-de-developpement-durable</a> (French) <a href="https://www.alouette.com/en/sustainability/sustainable-development-reports">https://www.alouette.com/en/sustainability/sustainable-development-reports</a> (English) The Entity introduced new and relevant ESG Indicators in 2022. The Entity 2022 Sustainability Report was published in December 2023. This first version is available only in French and will be available in English from early 2024.
3.2 Non-compliance and Liabilities	Conformance	When necessary, the Entity reports any non-compliance and liabilities via existing external communication tools. An administrative fine was disclosed in the 2022 Sustainable Development Report. The details of the administrative fine are available in the Environmental Incident Section of the Sustainability Report. The Entity publishes compliance data via its annual Sustainable Development Report and on the Entity's Webpage.
3.3a-c Payments to Governments	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. The Entity maintains a position of impartiality regarding partisan politics. Consequently, the Entity does not contribute to any political party, politician or candidate for public office, this is stated on the Code of Ethics and Business Conduct on page 17: <a href="https://www.alouette.com/en/our-commitment/governance">https://www.alouette.com/en/our-commitment/governance</a>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a series of complaints resolution tools and mechanisms to address Stakeholder complaints, grievances or requests for information relating to its operations. The preferred method to resolve disputes is through open dialogue. The process is aligned with the United Nations' Guiding Principles on Business and Human Rights. External Stakeholders lodge any complaints, grievances and requests for information at: <a href="https://www.alouette.com/en/contact-us">https://www.alouette.com/en/contact-us</a> Internal Stakeholders can use those tools which are the Advisory Committee (participatory management mechanism), the Environment, Health and Safety Committee, or the whistleblowing

CRITERION	RATING	COMMENT
		<p>mechanism supported by a neutral and impartial external firm (CanaGlobe Compliance Solutions). Internal and external Stakeholders can access this whistleblowing mechanism at: <a href="https://www.alouette.com/en/our-commitment/governance/whistleblower-line">https://www.alouette.com/en/our-commitment/governance/whistleblower-line</a></p> <p>This process will be reviewed every five years or as required if any changes to business or any indication of a control gap.</p>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has evaluated the life cycle impacts of its Primary Aluminium product which is a low-profile sow cast. A life cycle analysis was performed by an external firm on behalf of the Aluminium Association of Canada (AAC) which established the carbon footprint of an Aluminium ingot produced in the Province of Quebec. A specific report has been prepared for the Entity. Other 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). An analysis of the Entity's carbon footprint was published in 2022. The paper is open access and available at: <a href="https://link.springer.com/article/10.1007/s11837-022-05501-y">https://link.springer.com/article/10.1007/s11837-022-05501-y</a></p>
4.1b-c Environmental Life Cycle Assessment – Disclosure	Conformance	<p>The Entity provides life cycle information (predominantly Greenhouse Gas emissions) on request to its owners and their customers. The completed forms requested by the shareholders for previous Life Cycle Assessment (LCA) information requests are recorded by the Entity's Environment Department. Certificates of analysis for finished Aluminium Products are readily available to shareholders. The methodology, data, limitations and system boundaries as well as the results of the Quantis study on the carbon footprint of Quebec Aluminium can be provided to the public upon request. The Entity's carbon footprint was published in 2022. The paper is available at: <a href="https://link.springer.com/article/10.1007/s11837-022-05501-y">https://link.springer.com/article/10.1007/s11837-022-05501-y</a></p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity minimises the generation of Aluminium Process Scrap within its operations. A rejection rate indicator is continuously monitored at the Casthouse. The Entity manages the residual materials generated by its activities using the principle of 4R (Reduce, Reuse, Recycle and Recover) in order to eliminate material being sent to landfill. 100% of the Aluminium is recycled. There is no production or recycling of Aluminium alloys, the Entity 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.</p>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	In collaboration with Aluminium Association of Canada (AAC) and the International Aluminium Institute (IAI), the Entity supports a collection and recycling strategy. AAC and its Members display accurate measurements and efforts.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a–b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity's 2022 Sustainable Development Report presents information on specific energy consumption for smelting and direct Greenhouse Gases (GHG) emissions by sources: Scope 1 Direct GHG Emissions were below 2t CO<sub>2</sub> eq. / t Al in 2022, and Scope 2 Indirect GHG Emissions are approximately 0.02 t CO<sub>2</sub> eq. / t Al. The only source of energy used by the Entity is 100 % from Hydro-Quebec's hydroelectricity.</p> <p>Accredited verification bodies have verified the 2013 to 2022 GHG emissions for the Province of Quebec Carbon Cap and Trade System. The 2022 Sustainable Development Report is available at: <a href="https://www.alouette.com/environnement/rapports-de-developpement-durable">https://www.alouette.com/environnement/rapports-de-developpement-durable</a> (French) <a href="https://www.alouette.com/en/sustainability/sustainable-development-reports">https://www.alouette.com/en/sustainability/sustainable-development-reports</a> (English)</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable as the Entity, their smelter operations commenced in 1992.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Conformance	An analysis of the Entity's carbon footprint was published in 2022 and demonstrates an intensity well below 11.0 t CO <sub>2</sub> e/t Al. This study demonstrates a footprint of 3.9 t CO <sub>2</sub> e/t Al for the year 2019. The paper is available at: <a href="https://link.springer.com/article/10.1007/s11837-022-05501-y">https://link.springer.com/article/10.1007/s11837-022-05501-y</a>
5.3a–e GHG Emissions Reduction Plans	Conformance	<p>The Entity has developed an emissions reduction plan. In 2022, the Entity planned to reduce its direct GHG by using natural gas for baking anodes, replacing heavy fuel oil. More information is available at: <a href="https://www.alouette.com/en/media/press-releases?id=2741">https://www.alouette.com/en/media/press-releases?id=2741</a></p> <p>By implementing the natural gas project in 2022, the Entity expects to reduce its GHG emissions related to anode baking fuels by approximately 30 percent by the end of 2023. It should be noted that 2023 will be the first complete year where the Entity will use natural gas instead of heavy fuel oil for the baking of anodes.</p> <p>The Entity is pursuing its reduction efforts by implementing various initiatives, including achieving carbon neutrality by 2050. Further information on the Entity's commitment to achieve carbon neutrality 2050 is available at: <a href="https://www.alouette.com/en/media/press-releases?id=2664&amp;pg=0">https://www.alouette.com/en/media/press-releases?id=2664&amp;pg=0</a></p> <p>The Entity also supports the Mission Possible Partnership (MPP) Aluminium Sector Decarbonisation Roadmap in autumn 2022: <a href="https://missionpossiblepartnership.org/aluminium-sts-press-release/">https://missionpossiblepartnership.org/aluminium-sts-press-release/</a></p> <p>A reduction plan beyond 2023 is currently in development, based on the trajectories presented in the MPP report. In particular, it focuses on process optimisation, the use of renewable materials and energy, and the development of technological solutions.</p> <p>The ASI Entity GHG Pathways Calculation Tool as an ASI endorsed methodology will be implemented in 2024.</p>

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Conformance	<p>The management of GHG emissions are subject to an internal procedure, which prescribes the quantification process, identifies source data, and ensures the traceability of the calibration of the measurement equipment.</p> <p>The Entity is also currently ISO 14001 certified and is annually verified by an accredited GHG verification body for the Province of Quebec Carbone Cap and Trade System.</p>
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	<p>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 the control of atmospheric emissions as well as ambient air sampling stations in conformity with its provincial Environmental Permit.</p> <p>The Entity monitors its Emissions to Air via its Environmental Management System (EMS) and preventive action plans are implemented to ensure emissions are in conformance with legal requirements.</p> <p>Material atmospheric emissions and the corresponding management plans are disclosed in the 2022 Sustainable Development Report. In the 'Environment and climate changes – Atmospheric Emissions' section.</p>
6.2a-g Discharges to Water	Conformance	<p>No process water is released into the environment. Run-off from the Entity is routed to a sedimentation basin and sampling of the final effluent is undertaken continually. Results are reported monthly to the provincial Ministry of Environment for the provincial Environmental Permit. Annual results are also published in the Entity's Sustainable Development Report.</p> <p>The specific Environmental Permit of the Entity is reviewed monthly by the Regional Respondents of the Provincial Ministry of Environment. The requirements of this specific permit are considered to be very strict in acknowledgment of the environmental sensitivity of the Entity's Area of Influence. For Discharges to Water, the Entity's Area of Influence is the Gulf of the St-Laurent.</p> <p>Material Discharges to Water and the corresponding management plans are disclosed in the 2022 Sustainable Development Report in the 'Environment and climate changes – Preserving life' section.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has implemented a procedure for 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. Preventive maintenance programs are scheduled and performed. A 'go/no-go' process and communication with Stakeholders has also been established. Inspections and monitoring with alarm detection are undertaken to detect Spills or equipment failures. ERPs which include disclosure to authorities have been implemented in case of equipment failure and/or Spills.</p> <p>The ERPs are reviewed at least every three years or as needed after any Spill or discharge, any changes to business that may materially affect risks of Spills or discharges or any sign of a control gap. As specified in the management manual and the 2022 Sustainability Report, emergency procedures are tested annually to improve response to emergency situations. Also, a post-intervention</p>

CRITERION	RATING	COMMENT
		<p>assessment is undertaken after a major event (e.g. fire extinguisher water). Spill response requirements are incorporated in the ERP.</p> <p>ERP are publicly disclosed on the Entity's website in the health and safety section. <a href="https://www.alouette.com/en/our-company/employees/health-and-safety">https://www.alouette.com/en/our-company/employees/health-and-safety</a></p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>Any Spill or Leakage is declared to both provincial and federal governmental authorities and followed up by the Entity's Environment team. Spills and both planned and unplanned equipment shutdowns (such as air scrubbers and dust collectors) are tracked and included in monthly and annual reports, which are provided to the provincial Ministry of Environment for the provincial Environmental Permit.</p> <p>For major planned shutdowns on air scrubbers (to ensure the efficiency of the equipment in the long-term), the Entity informs the local (municipal) authorities and other Stakeholders to explain the reason(s), anticipated impacts and mitigation measures.</p> <p>The Entity has implemented the required mechanisms to publicly disclose Impact Assessments of Spills (if any) and any remediation actions taken through the annual Sustainability Reporting function. Spill management and ERP deployment and drills have been audited as per the ISO 14001 certification process. Debriefs relating to the ERP address Impact Assessments of the spills and remediation actions taken as required.</p> <p>ERP debriefings address Impact Assessments of Spills (if any) and remediation actions taken. In case of major Spills, the Sustainability Report will be the preferred vehicle to communicate the Impact Assessments of the Spills and any remediation actions taken. A press release may also be considered to reassure any potentially affected Stakeholders.</p> <p>In 2022, there were no significant Spills on-site. The potential impact of any material Spills and Leakages will be published as soon as practicable after an incident. A section on Spills and Leakages is presented in the 2022 Sustainability Report, in the 'Environment and climate changes – Environmental Incidents' section.</p>
6.5a-c Waste Management and Reporting	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. Projects and initiatives on waste reduction or recycling are implemented to improve overall performance. The Entity uses a Circular Economy approach for their waste management plan. Through its annual Sustainability Report, the Entity has disclosed the summary of its Hazardous and Non-Hazardous Waste and disposal methods.</p> <p>In addition, the Entity annually uploads their data related to Hazardous Wastes to the Provincial Ministry of the Environment's website and is included in the Provincial Ministry of the Environment's annual report. Spent Pot Lining (SPL) is independently and separately reported from other Hazardous Wastes of the Entity.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	The Entity stores and manages SPL in a manner that prevents release to the environment. The Entity has an approved building with a certificate of authorisation from the Provincial Ministry of Environment for the safe storage of SPL. The Entity has implemented a detailed procedure to ensure safe loading and unloading operations and to minimise any particulate emissions. Official quarterly inspections are

CRITERION	RATING	COMMENT
		<p>conducted and documented.</p> <p>The Entity optimises processes for the recovery and recycling of carbon and refractory materials from SPL. The Entity does not landfill untreated SPL, which is stored inside a controlled warehouse. SPL is not landfilled or stockpiled outside. All SPL are sent to an external and approved treatment plant.</p> <p>Treated SPL residue (i.e. the refractory portion) may occasionally be sent by the SPL treatment plant to an authorised landfill site or recycled or valorised. In 2022, the treated SPL residues have been 100% recycled. The Entity does not discharge SPL into the environment, including marine or aquatic environments.</p>
6.8a-d Dross	Conformance	<p>Dross is recycled by external specialised and authorised Contractors. The recovery rate of Aluminium and other Dross residues is maximised where possible. In the majority of cases, 100% of the residue is recycled while in some exceptional situations, a small fraction is disposed of at authorised sites.</p> <p>The Entity has reviewed alternative options to landfilling of Dross residues. A strategic management plan has been implemented to reduce landfill and technological improvements are currently underway.</p>
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	<p>A Life Cycle Assessment LCA has been undertaken for the Entity's water usage. All water is provided to the Entity via the municipal water network. Water is used predominantly for cooling water for the process and domestic purposes.</p> <p>The Entity does not own nor control any hydropower facility nor directly withdraw fresh or underground water for operational or domestic reasons. The only groundwater withdrawal is for non-significant quantities for underground water environmental monitoring.</p> <p>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. Lawrence Gulf. Domestic effluents are collected and disposed of in the city wastewater treatment facility.</p> <p>The Entity's site and Facilities have no significant influence or material risk on water quality in the Watersheds of the Area of Influence (St Lawrence Gulf, Marconi Peninsula – industrial zone, Bay of Sept-Iles, the Sept-Iles Archipelago, the City of Sept-Iles and Clarke-City – residential zone). Water usage or discharge is disclosed in the 2022 Sustainability Report.</p>
7.2a-e Water Management	Not Applicable	<p>The Criterion is not applicable as the Entity's site and Facilities have no significant influence or Material risk on water quality in the Watersheds of the Area of Influence.</p>
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>Full Impact Assessment studies have been undertaken by a third party for both Phase 1 and Phase 2 of the expansion project of the Entity's site and Facilities. The risk studies on biodiversity demonstrate the absence of threatened or vulnerable species in the Area of Influence. The main risk is the impact of the fluoride emissions on terrestrial vegetation.</p>

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		The biological receiving environment, as described in the Phase 2 Impact study, is considered the applicable Area of Influence for Biodiversity and Ecosystem Services.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	The Criterion is not applicable as the risks and potential impacts on Biodiversity and Priority Ecosystem Services identified have been assessed as low.
8.2a-g Biodiversity Management	Conformance	<p>The Entity has developed a Biodiversity Action Plan, determined by the provincial Environmental Permit, which requires the monitoring of all potential impact factors and risks on biodiversity. Surveying and monitoring are conducted annually with the use of fluoride bio-indicators. In addition, an ambient air monitoring program addresses the Entity's Area of Influence. No impacts have been identified to date outside the site. An annual inspection of fluoride impact on vegetation is also undertaken by the Entity.</p> <p>The Provincial Ministry of Environment has developed specifications and requirements for the Biodiversity Action Plan monitoring programs in the Provincial Environmental Permit. Impact Assessments were subject to public consultation before construction and expansion. The Entity has implemented avoidance and minimisation measures. Rehabilitation, restoration or offsetting measures were not required. A summary of the ambient air results and vegetation/biodiversity impacts is presented in the 2022 Annual Report on Sustainable Development. The targeted parameters are hydrogen fluoride (HF), sulphur dioxide (SO<sub>2</sub>) and particles. Biodiversity management is discussed in the Entity's Sustainability Report, in the 'Environment and climate changes – Preserving life and Biodiversity' and the 'Environment and climate changes – Ambient Air' sections.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable as no Priority Ecosystem Services have been identified in the Impact Assessments.
8.4 Alien Species	Conformance	The Entity has implemented a procedure to manage the risk of Alien Species introduction, predominantly related to foreign packaging materials. The Entity requires that all vessels are certified by RightShip Approval and adhere to the International Marine Organization (IMO) procedures for ballast water.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable as the Entity is not located on, adjacent or near World Heritage Properties.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable as the Entity is not located on, adjacent or near Protected Areas.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-l Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity implements efforts to respect Human Rights in a manner 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, the Code of Ethics and Business Conduct, and a Gender-Responsive Policy commitment to respect Human Rights. The Respectful Workplace Policy explicitly refers to the Canadian Charter of Rights and Freedoms 1982.</p> <p>Further information is available at:</p> <p>ESG commitment: <a href="https://www.alouette.com/en/our-commitment/esg-vision">https://www.alouette.com/en/our-commitment/esg-vision</a></p> <p>Sustainability Actions: <a href="https://www.alouette.com/en/sustainability/actions">https://www.alouette.com/en/sustainability/actions</a></p> <p>Social Responsibility Politic (in French): <a href="https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/politique_de_responsabilite_sociale.pdf?v=1699994546">https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/politique_de_responsabilite_sociale.pdf?v=1699994546</a></p> <p>Code of Ethics and The Partner Code of Conduct (for suppliers): <a href="https://www.alouette.com/en/our-commitment/governance">https://www.alouette.com/en/our-commitment/governance</a></p> <p>2022 Sustainability Report ('Our Human Capital' section): <a href="https://www.alouette.com/environnement/rapports-de-developpement-durable">https://www.alouette.com/environnement/rapports-de-developpement-durable</a> (French)</p> <p><a href="https://www.alouette.com/en/sustainability/sustainable-development-reports">https://www.alouette.com/en/sustainability/sustainable-development-reports</a> (English)</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has implemented 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 respect for the rights and interests of women with a gender equity perspective.</p> <p>The effectiveness of the measures taken to promote gender equity on an annual basis is published in the 2022 Sustainability Report (the 'Our Human Capital – Celebrate the differences' section).</p>
9.3a-l Indigenous Peoples	Conformance	<p>The Entity consults and cooperates in good faith with the local First Nations community. Indigenous Peoples are consulted when the Entity proposes an initiative such as land use, employment, economic opportunities and presence in the community.</p> <p>Permanent communication channels have been implemented between the Entity and the Band Council: Innu Takuaikan Uashat Mak Mani-Utenam (ITUM).</p> <p>Regular meetings are also held between the Band Council's Chief and the Entity's President. The Entity is continuous consultation via various mechanisms, including an annual breakfast with the community, continued communication with the employment development group of the Community, presence in schools (promotion of employment opportunities), as well as contributions to professional training and granting of scholarships, and different community support initiatives. The Entity also invites the Innu business community to participate in the Entity's call for tenders.</p> <p>Further information on the Entity's commitment to respecting Human Rights with an Indigenous Peoples perspective is available at:</p> <p>ESG commitment: <a href="https://www.alouette.com/en/our-commitment/esg-vision">https://www.alouette.com/en/our-commitment/esg-vision</a></p> <p>Social Responsibility Politic (in French):</p>



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		<a href="https://www.alouette.com/data/63-gaiv2/ressources/documents/sys_docs/politique_de_responsabilite_sociale.pdf?v=1699994546">https://www.alouette.com/data/63-gaiv2/ressources/documents/sys_docs/politique_de_responsabilite_sociale.pdf?v=1699994546</a>
9.4a Free, Prior, and Informed Consent (FPIC)-- New Projects or Major Changes	Conformance	<p>There are no planned Major Changes or New Projects that may trigger an Environmental, Social or Human Rights Impact Assessment or a formal ensure Free, Prior and Informed Consent (FPIC) process. The Entity provides FPIC to the local First Nations community prior to the approval of any project that would affect their lands or territories and other resources.</p> <p>The Entity has demonstrated its ability to conduct environmental, social, cultural and Human Rights Impact Assessments for New Projects or Major Changes to existing Facilities. The management of operational changes, significant projects or major modifications to existing Facilities are supervised by a defined process that includes global and comprehensive risk analysis.</p> <p>In Canada and the Province of Quebec, laws and regulations for Impact Assessments are strict. In Canada, laws which protect Human Rights and First Nations have been well entrenched and local legislation is very advanced with respect to these areas.</p> <p>Where required, First Nations affected by any project can participate actively in the authorisation processes and consultation related to the legal Impact Assessment processes.</p>
9.4b Free, Prior, and Informed Consent (FPIC)-- Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC)-- Demonstrate support	Conformance	<p>There is no planned Major Changes or New Projects that may currently trigger an Environmental, Social or Human Rights Impact Assessment or an official FPIC Process.</p> <p>If and as required in future, Indigenous Peoples would be systematically consulted in the event the Entity would commence a project/initiative that could potentially affect their lands and/or livelihoods.</p>
9.5a Cultural and Sacred Heritage-- Identification	Conformance	<p>The receiving environment is the St-Lawrence Gulf, the Marconi Peninsula (industrial zone), the Bay of Sept-Iles, the Sept-Iles Archipelago, the City of Sept-Iles and Clarke-City (a residential zone). This area also includes ITUM's Uashat community, including the Georges-Ernest sector located in the vicinity of the City of Sept-Iles.</p> <p>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.</p> <p>The Entity regularly consults with potentially affected communities, more specifically the ITUM Band Council.</p>
9.5b Cultural and Sacred Heritage - Impacts	Conformance	<p>No socio-economic activities were impacted on the Marconi Peninsula during the establishment of the Entity and its expansion, and no heritage, sacred or Cultural site was impacted, no specific action has been required by the Entity to avoid or remedy impacts. However, the Entity regularly consults with potentially affected communities, more specifically the ITUM Band Council.</p>

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9.6a-i Displacement	Conformance	<p>The Entity is located in an industrial complex that includes only heavy industry and complies with the development plan and zoning plan of the City of Sept-Îles (Province of Quebec, Canada).</p> <p>Environmental Impact Assessment studies determined that there were no significant impacts on land use. Since no displacement or relocation of human activities has occurred or is foreseen, the Entity does not require a Resettlement Action Plan. The closest community (Clarke-City) by road is located approximately 14 kilometres from the Entity and there are no neighbours, recreational or commercial activities around the Entity, except for port activities.</p>
9.7a-h Affected Populations and Organisations	Conformance	<p>Potentially Affected Populations and Organisations were consulted during the Legal Impact Assessments studies. After these studies were found to be satisfactory, the Governments authorised the implementation (Phase 1) and expansion (Phase 2) of the Entity's smelter, Facilities and activities. 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 (in 2002).</p> <p>The Entity explores with Local Communities opportunities to respect and support their livelihoods, through its support to economic development organisations, particularly with respect to initiatives highlighting the expertise of aboriginal businesses.</p> <p>Stakeholders' group representatives including the First Nations were interviewed during this Audit.</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity and its shareholders have the tools and processes to identify and assess risk to contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). These processes have been deployed in the Alumina supply chain by the shareholders. These processes are managed by the Owners' Alumina Committee members who is ASI Performance Standard and ASI Chain of Custody Certified.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Entity does not contribute to armed conflict nor Human Rights abuses in CAHRAs. The Entity is not located in a CAHRA, as Canada has been assessed as a low-risk country. The Entity has a provision to prevent the supply of raw materials to CAHRAs.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>It has been demonstrated by shareholders that whenever any risk is identified by the Entity or its shareholders in the Alumina supply chain, a specific strategy is designed and implemented to mitigate risk.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity, along with its shareholders, conducts internal and external audits annually on various pertinent topics to ensure its ongoing compliance with ethical sourcing standards and identify areas for improvement in the supply chain. The Owners' Alumina Committee members that are ASI Certified have the necessary processes implemented to be in conformance with this Criterion.</p>
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	<p>Through the Owners' Alumina Committee where the Entity meets with its shareholders and in other forms of accountability driven by the Owners' Agreement, supply chain Due Diligence results are reported at least annually between the Entity and its shareholders. Urgent matters from the Alumina supply chain are reported more frequently as needed.</p>

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9.9 Security practice	Conformance	A private Contractor firm 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. There are no armed personnel on site or any abusive security practices. The security provider has applied recognised sound standards.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the rights of Workers to associate freely and collectively bargain. The Workers are not affiliated with a Trade Union. An Advisory Committee is in place and contributes to a collaborative approach, which is the foundation of the Entity's employees' relations. Members of the Committee consist predominantly of elected representatives from the Workers of all divisions across the Entity. Various mechanisms are in place within the Advisory Committee to enable ongoing exchanges, market benchmarking and reviews of working conditions. The minutes from the meetings of this Committee are accessible to employees via an internal intranet portal. Members of the Advisory Committee were independently interviewed for the purposes of this Audit, and confirmed these findings.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as Freedom of Association and the Right to Collective Bargaining are permitted in the country (Canada) where the Entity operates.
10.2a-c Child Labour	Conformance	The Entity has demonstrated it does not engage in, nor support Child Labour. The basic minimum age to work at 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. 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 significantly reduced.
10.3a-c Forced Labour	Conformance	The Entity implements human resources best practices. There is no Forced Labour in the Entity and no human trafficking that are strictly forbidden in the Province of Quebec and in Canada. There is no required deposit or recruitment fee. Personal Protective Equipment (PPE) is supplied or paid by the Entity, and there is no required lodging deposit or security payment by the Entity. The Entity also does not hold Workers in debt bondage or force them to work to pay off any debt. The Entity does not unreasonably restrict the freedom of movement of workers and there is no on-site housing. The only access restrictions that apply on-site are for Occupational Health and Safety (OH&S) purposes and intellectual property protection. The Entity does not take any original identity paper, work permit, travel document or training certificates. All personal human resources files remain accessible to the concerned employee during opening hours, including reproductions or photocopies of employees' documents. The process of applying for job(s) is voluntary and open to all applicants via mail, in person and online via the Entity's website. Foreign Workers must have a valid Canadian work permit. The employees have the freedom to terminate their employment within the legal frame of the Province of Quebec and Canadian legislation. The Entity has published multiple statements detailing, amongst others, how it respects the Human Rights and Labour Rights

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		<p>and its actions to address potential abuses such as Modern Slavery. The Social Responsibility Politic presents the Entity's engagements against Modern Slavery: <a href="https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/social_responsibility_policy.pdf?v=1705518358">https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/social_responsibility_policy.pdf?v=1705518358</a></p> <p>The Entity is currently finalising its Modern Slavery Statement, as this will be a requirement under Canadian Law from mid-2024. This first legal Modern Slavery Statement will be shared through the following link after May 31, 2024, and will be revised annually: <a href="https://www.alouette.com/en/our-commitment/governance">https://www.alouette.com/en/our-commitment/governance</a></p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity implements efforts to not engage in, nor support Discrimination, in any type or form, in a manner appropriate to its circumstances. Those efforts include 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 Entity also applies all the prescribed labour work standards in its hiring processes.</p> <p>Members of the Advisory Committee were independently interviewed for the purposes of this Audit, and confirmed these findings.</p>
10.5 Communication and engagement	Conformance	<p>The Entity ensures open communication and direct engagement with Workers regarding work related conditions, and does this through different communication platforms. There are two formal employee committees made up of elected members' representatives of the Entity's organisational structure. These are the Central Joint Environment, Occupational Health and Safety (OH&amp;S) Committee and the Advisory Committee for working conditions, employee relations and compensation.</p> <p>An Employee Assistance Program (EAP) is provided by an external firm for employees and their family members where all information remains confidential. Members of the Advisory Committee and the Central Joint OH&amp;S Committee were independently interviewed for the purposes of this Audit, and confirmed these findings.</p>
10.6a-g Violence and Harassment	Conformance	<p>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 a system of gradation.</p> <p>Risks relating to mental coercion are managed through a set of tools that includes the implementation of a Respectful Workplace Policy, a procedure for behaviour management, the Advisory Committee, as well as the Code of Ethics and Business Conduct.</p> <p>The Entity has published multiple statements detailing, amongst others, how it respects the Human Rights and Labour Rights and its actions to address potential abuses such as Violence and Harassment. Further information on performance relating to Violence and Harassment prevention includes:</p> <p>ESG commitment: <a href="https://www.alouette.com/en/our-commitment/esg-vision">https://www.alouette.com/en/our-commitment/esg-vision</a></p> <p>Social Responsibility Politic (in French): <a href="https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/politique_de_responsabilite_sociale.pdf?v=1699994546">https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/politique_de_responsabilite_sociale.pdf?v=1699994546</a></p> <p>Partners Code of Conduct: <a href="https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/alouette_supplier_codeofco">https://www.alouette.com/data/63-aalv2/ressources/documents/sys_docs/alouette_supplier_codeofco</a></p>

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		<a href="#">nduct_oct2019_eng.pdf?v=1574094403</a> Code of Ethics and Business Conduct: <a href="https://www.alouette.com/data/63-galv2/ressources/documents/sys_docs/141605_code_ethics_ang_aa_i.pdf?v=1580221146">https://www.alouette.com/data/63-galv2/ressources/documents/sys_docs/141605_code_ethics_ang_aa_i.pdf?v=1580221146</a>
10.7a-d Remuneration	Conformance	The Entity has demonstrated that it appropriately remunerates Workers. A salary survey is conducted annually with the support of an external firm, and the results are communicated to employees. Payments are made in a timely manner and on a weekly basis, in legal tender and fully documented through electronic means. The Entity respects the laws and regulations applicable to the Province of Quebec and Canada in terms of labour law.
10.8a-c 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.
10.9a-b Informing Workers of Rights	Conformance	The Entity respects the laws and regulations applicable to the Province of Quebec and Canada in terms of labour law. The Entity applies an 'open-door' philosophy, and a collaborative approach and presents an adequate intake and integration program. The Entity regularly informs Workers via various communication channels to ensure that they are well informed of their rights.
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System, which is certified to ISO 45001:2018. The Entity performs internal audits, inspections and verifications continuously. The OH&S Management System is audited each year by an ISO Accredited Certification Body and the results are presented to the Entity's senior management. The Entity's valid ISO 45001 certificate is available at: <a href="https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=ALOUETTE&amp;noCertificat=#recherche_rc_input">https://www.bnq.qc.ca/en/certified-clients.html?nomentreprise=ALOUETTE&amp;noCertificat=#recherche_rc_input</a>
11.1b-e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure	Conformance	The OH&S Management System is reviewed at least every three years. Risks are identified and monitored on an ongoing basis. The risk management procedure specifies that all changes require a risk analysis. The OH&S Management System may also be reviewed as needed after any change to business that represents OH&S material risks or on any indication of a control gap. The 2022 Sustainability Report presents leading and lagging indicators and a comparative analysis of OH&S performance between the Entity and its peers from the Aluminium Association of Canada (AAC). Refer to the 'Our human capital - Promote a healthy and safe workplace' section: <a href="https://www.alouette.com/environnement/rapports-de-developpement-durable">https://www.alouette.com/environnement/rapports-de-developpement-durable</a> (French) <a href="https://www.alouette.com/en/sustainability/sustainable-development-reports">https://www.alouette.com/en/sustainability/sustainable-development-reports</a> (English)
11.2 Employee engagement on Health and Safety	Conformance	Workers have access to the Central Joint Occupational Health and Safety (OH&S) Committee and are supported by joint Sectorial Committees. Both Committees meet approximately ten times a year and minutes of meetings are provided on notice boards and the

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		<p>Intranet. Different means are available for the Workers to provide suggestions and improvements such as pre-shift meetings, workplace inspections or projects approval.</p> <p>The Central Joint OH&amp;S Committee Co-President was interviewed as an internal Stakeholders' representative, and it was demonstrated the implementation and maintenance of the Workers' engagement in OH&amp;S and the efficient deployment of the Committee. Two active members of the Advisory Committee have also been interviewed, and demonstrated the implementation and maintenance of the Workers' engagement.</p>

### ASI LIMITATION OF LIABILITY DISCLAIMER

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### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	13 July 2020	Initial Certification Audit – Full Certification
1	30 January 2022	Surveillance Audit
2	12 July 2023	Re-Certification Audit – Full Certification
3	29 January 2024	Re-Certification and Scope Change Audit from Performance Standard V2 to V3.

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