ASI CERTIFICATION
PERFORMANCE STANDARD

PRESENTED TO

Aluminium Dunkerque

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
88	**PERFORMANCE STANDARD (V3.1 2023)**	**FULL CERTIFICATION**	**GUTCERT (AFNOR GROUP)**
	DATE OF ISSUE	DATE OF EXPIRY	CERTIFIED SINCE
	30 JUNE 2026	**29 JUNE 2029**	**3 AUGUST 2020**

AUTHORISED BY

CERTIFICATION SCOPE

Production and sale of Aluminium by electrolysis of Alumina in the form of rolling slabs and ingots for remelting at Aluminium Dunkerque, France.

Aluminium Stewardship Initiative Ltd
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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

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Aluminium Dunkerque SAS
ENTITY NAME	Aluminium Dunkerque
CERTIFICATION SCOPE	Production and sale of Aluminium by electrolysis of Alumina in the form of rolling slabs and ingots for remelting at Aluminium Dunkerque, France.
SUPPLY CHAIN ACTIVITIES	• Aluminium Smelting • Casthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (23 – 25 June 2020) • Surveillance Audit (4 – 6 October 2021) • Re-Certification Audit and Scope Change (29 May – 2 June 2023) • Surveillance Audit (7 – 10 April 2025) • Re-Certification Audit (19 – 22 May 2026)
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	• 23 – 25 June 2020 (Initial Certification Audit) • 4 – 6 October 2021 (Surveillance Audit) • 29 May – 2 June 2023 (Re-Certification Audit and Scope Change) • 7 – 10 April 2025 (Surveillance Audit) • 19 – 22 May 2026 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	• 9 July 2020 (Initial Certification Audit) • 26 October 2021 (Surveillance Audit) • 16 June 2023 (Re-Certification Audit and Scope Change) • 6 May 2025 (Surveillance Audit) • 4 June 2026 (Re-Certification Audit)
AUDIT SCOPE	<u>Initial Certification Audit (23 – 25 June 2020)</u> The Audit Scope covered the Alvance Aluminium Dunkerque facility including the smelter and the Casthouse based in Dunkerque, France. The production and sale of aluminium by electrolysis of Alumina in the form of rolling slabs and ingots for remelting at the Dunkerque site. The 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

	<u>Surveillance Audit (4 – 6 October 2021)</u> The Audit Scope covered the Aluminium Dunkerque facility including the smelter and the Casthouse based in Dunkerque, France. The production and sale of Aluminium by electrolysis of Alumina in the form of rolling slabs and ingots for remelting at the Dunkerque site. The 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. <u>Re-Certification Audit and Scope Change (29 May – 2 June 2023)</u> The Audit Scope covered the Aluminium Dunkerque facility including the smelter and the Casthouse based in Dunkerque, France. The production and sale of Aluminium by electrolysis of Alumina in the form of rolling slabs and ingots for remelting at the Dunkerque site. The 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. <u>Surveillance Audit (7 – 10 April 2025)</u> The Audit Scope covered the Aluminium Dunkerque Facility including the smelter and the Casthouse based in Dunkerque, France. The production and sale of Aluminium by electrolysis of Alumina in the form of rolling slabs and ingots for remelting at the Dunkerque site. The supply chain activities included in the Audit Scope: • Aluminium Smelting • Casthouses Criteria that were identified as non-conformities from the previous Audit were included in the Audit Scope. <u>Re-Certification Audit and Scope Change (19 – 22 May 2026)</u> The Audit Scope covered the Aluminium Dunkerque facility including the smelter and the Casthouse based in Dunkerque, France. The production and sale of Aluminium by electrolysis of Alumina in the form of rolling slabs and ingots for remelting at the Dunkerque site. The supply chain activities included in the Audit Scope: • Aluminium Smelting • Casthouses All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.
AUDIT OUTCOME	• Certification
AUDIT METHODOLOGY DECLARATION	The Auditors confirm that: ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. ☑ The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. ☑ The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.

	☑ The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	30 June 2026 – 29 June 2029
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	30 December 2027
CERTIFICATE NUMBER	88
	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.

ENTITY OVERVIEW

Located in northern France near Dunkirk, the Aluminium Dunkerque (the 'Entity') plant was founded in 1991. It was purchased by AIP (American Industrial Partners) in October 2021 and is the largest Primary Aluminium foundry in Europe, with a capacity of approximately 290,000 tonnes per annum and incorporates 264 retention cells.

The Entity currently has approximately 850 employees on site with a further 200 contractors engaged on a full-time basis.

The area under management is approximately 65 hectares (ha). The nearest towns are Gravelines and Loon Plage, both located approximately four kilometres from the Entity. Nearby sensitive receptors include the Natura 2000 reserve "Bancs de Flandres" and the natural reserve of "Platier d'Oye" both located within five kilometres from the Entity.

Key external Stakeholders include the local towns (i.e. Gravelines and Loon Plage), the local authorities, Dunkirk Harbour, and the Site Surveillance Committee (CSS).

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
SYSTEMS	Medium	High	Medium	MEDIUM
RISKS	Medium	High	Medium	MEDIUM
PERFORMANCE	High	High	Medium	HIGH
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	The Entity has implemented procedures to ensure compliance with Applicable Law. There is no customary law in metropolitan France. Employee awareness on legal topics is raised through communication and training. Compliance assessment is well-structured and closely monitored for certain topics including environment, Health, and Safety. The overall status and reporting of legal compliance and relevant regulatory requirements applicable to the Entity is however considered too generic and incomplete.
1.2 Anti-Corruption	Minor Non-Conformance	The Entity has implemented various mechanisms (including a risk assessment and an anti-Corruption code) to work against Corruption in all its forms, consistently with Applicable Law and international standards. The Entity has recorded no recent Corruption incidents. The Entity has improved its practices since the previous Audit. At the time of the Audit, the implementation of some procedural controls relating to financial transactions and monitoring however were still ongoing.
1.3a-e Code of Conduct	Conformance	The Entity has implemented a General Code of Conduct that addresses principles relevant to environmental, social and governance performance. The Code is regularly reviewed (most recent review was this year) and has been widely communicated internally and externally. The Code is disclosed at: https://www.aluminiumdunkerque.com/our-csr-strategy
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed, maintains and communicates both a Policy and a General Code of Conduct consistent with the Environmental, Social and Governance (ESG) practices of the ASI Performance Standard. These documents are regularly reviewed and updated, and available at: Aluminium Dunkerque Policy: https://www.aluminiumdunkerque.com/our-pillars/ Code of Conduct: https://www.aluminiumdunkerque.com/our-csr-strategy
2.2a-c Leadership	Conformance	The Entity's Commercial Manager, who is also a member of the Steering Committee, has been nominated as the ASI Management Representative. This role has the responsibility and authority for ensuring conformance with the ASI Performance Standard. Other managers (including Human Resources (HR), Corporate Social Responsibility (CSR), and Communication Managers) are also responsible for the implementation and communication of the Policies. Adequate resources to implement and improve the Entity's ASI Management System are provided.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an Environmental Management System according to ISO 14001 and an Energy

CRITERION	RATING	COMMENT
		Management System according to ISO 50001. Both systems are certified by an accredited certification body.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has documented and implemented a Social Management System. Whilst the system is not certified, it contains all the main components of a system consistent with international standards.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented responsible sourcing Policies addressing environmental, social and governance issues, including primarily the Purchasing Policy and a new Responsible Supply Charter, as well as an internal Due Diligence process. These Policies are regularly reviewed. The Purchasing Policy and the Responsible Supply Charter are available at: https://www.aluminiumdunkerque.com/suppliers-and-services Since the previous Audit, improvements have been made regarding the Due Diligence process, specifically relating to supplier audits.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no Major Changes or New Projects.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented a Safety Management System focused on major hazards and emergency plans that are regularly inspected by the authorities. The Entity has implemented a certified ISO 14001 Environmental Management System which requires emergency preparedness and response controls. The Entity also has its own fire and emergency brigade. The Entity has developed site-specific Emergency Response Plans in collaboration with potentially affected Stakeholders (including authorities and Workers' representatives). This is predominantly an Internal Operation Plan (POI) but also includes other emergency plans which are regularly reviewed. Drills are also regularly undertaken. Due to the safety and security risks associated with full public disclosure of the plans, only the authorities and emergency services are fully informed. Some elements are available for disclosure upon request, subject to management approval.
2.8a-d Suspended Operations	Conformance	Based on its risk assessment, the Entity has developed, various emergency, or Business resilience plans (e.g. plans for civil conflicts, pandemics, natural disasters, and cyberattacks). These plans are regularly reviewed, at least every five years, or in case of any significant change/indication of a control gap.
2.9a-b Mergers and Acquisitions	Conformance	Future mergers and acquisitions would be managed at the Entity's Corporate Headquarters. When there is a merger or acquisition, an environmental, social and governance Due Diligence process is activated according to corporate processes and would include consideration of Historical Aluminium Operations. There have been no mergers or acquisitions since 2021.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	Closure, decommissioning, or divestment activities at the Entity's Corporate Headquarters. In such a case, an environmental, social and governance review process would be activated, according to a closure plan. Stakeholders' consultations would take place and a plan for monitoring Material impacts, including Legacy Impacts, would be implemented, as required by French regulations. A closure plan was documented in 2016 by the previous owner of the facility and was updated recently to include a revision of financial considerations. There have been no recent cases of closure, decommissioning, or divestment for the Entity.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its Material environmental, social, and economic impacts on its website and in its CSR Report 2025, available at: https://www.aluminiumdunkerque.com/our-csr-strategy
3.2 Non-compliance and Liabilities	Conformance	The Entity has publicly disclosed significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law. The Entity's regulatory Compliance status is disclosed in the CSR Report, pages 58-59 and 80: https://www.aluminiumdunkerque.com/our-csr-strategy
3.3a-c Payments to Governments	Conformance	The Entity has developed and implemented a Code of Conduct and processes related to financial transactions, including payments to governments. Only legal and obligatory payments related to taxes and duties are paid to governments. No financial or in-kind political contributions are made. Taxes paid are disclosed at: https://www.pappers.fr/entreprise/aluminium-dunkerque-321970782
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented various mechanisms to address Stakeholder complaints, grievances, and requests, especially the Works Council, a site committee with external Stakeholders and the company website. The Entity's 'whistleblowing' line is available through the Sustainable Procurement Charter. Refer to: https://whistleblowersoftware.com/secure/98b1c541-3d45-4f93-bf1e-681d526f8fb2/channel-select These mechanisms are regularly reviewed and shared with Stakeholders.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has performed a complete Life Cycle Assessment (LCA) for its main Aluminium Product lines (slabs and ingots).
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has publicly disclosed its LCAs for its main Aluminium Product lines (slabs and ingots) at: https://www.aluminiumdunkerque.com/our-csr-strategy Upon customer request, accurate information regarding data used in these assessments are provided. Information provided includes underlying assumptions and system boundaries.
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a process to minimise Aluminium Process Scrap and segregate Scrap by alloys and grades to facilitate recycling. This process involves labelling, updating the storage register and inventory and training employees. The Entity targets 100% of Scrap for collection, recycling, and/or re-use. Action plans are implemented. Currently, most Scrap is recycled internally.
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.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity engages with various regional collection and recycling initiatives regarding the Circular Economy. Some internal/external Scrap is recycled in the new smelter on site. The Entity is currently exploring partnerships with downstream customers to support recycling.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity accounts for and publicly discloses its Material Greenhouse Gas (GHG) emissions and energy use annually in its CSR Report 2025, pages 21-29: https://www.aluminiumdunkerque.com/our-csr-strategy These data are independently verified prior to publication.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as the Smelter commenced production before 2020.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Conformance	The Entity has a Mine to Metal GHG emissions intensity of approximately 4t CO_2e/t Al (below the 11 t CO_2e /t Al threshold).
5.3a GHG Emissions Reduction Plans	Conformance	The Entity has established a GHG Emissions Reduction Plan and defined a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario and is aligned with the ASI endorsed methodology.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Conformance	The Entity's GHG Emissions Reduction Pathway includes Intermediate Targets for 2025, 2030, and 2050, which addresses both Direct and Indirect GHG Emissions. It is globally consistent with the ASI endorsed methodology. The 2025 targets for scopes 1 and 2 GHG emissions have been achieved. The Entity's emission reduction trends for Scope 1, 2, and 3 GHG emission types is positive, further calculations are being undertaken The GHG Emissions Reduction Plan and Pathways are regularly reviewed and publicly disclosed annually in the CSR Report 2025, as well as the progress against the GHG Emissions Reduction Plan, pages 22-29: https://www.aluminiumdunkerque.com/our-csr-strategy
5.4 GHG Emissions Management	Conformance	The Entity has implemented an ISO 14001 Management System certified by a third party, which incorporates GHG emissions management. Operational control procedures, regular monitoring,

CRITERION	RATING	COMMENT
		and audits (especially relating to the electrolysis process) are implemented to achieve performance aligned with the GHG Emissions Reduction Plan and targets. A specific team is dedicated to the implementation and management of decarbonisation projects throughout the Entity.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity quantifies, monitors, and manages its Emissions to Air within its Area of Influence (limited to the Facility area, the loading dock, and the airshed) according to French regulations and its certified ISO 14001 Environmental Management System. Air emissions are controlled at the Facility and its surrounds, according to local regulations and permits. Plans are implemented to reduce impacts, which are regularly reviewed. The Entity has published its air emissions and action plans in its CSR Report 2025 (pages 34-37) and the VSME Report 2025 (page 13): https://www.aluminiumdunkerque.com/our-csr-strategy
6.2a-g Discharges to Water	Conformance	The Entity quantifies, monitors, and manages its Discharges to Water within its Area of Influence (limited to the Facility area and the loading dock) according to French regulations and its certified ISO 14001 Environmental Management System. Discharges to Water are strictly controlled according to local regulations and permits. Plans are implemented to reduce their impacts, and they are regularly reviewed. The Entity publicly reports Discharges to Water on its website, through its CSR Report 2025 (page 36), and the VSME Report 2025 (page 12): https://www.aluminiumdunkerque.com/our-csr-strategy
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has implemented a Management System, including emergency, monitoring, and communication procedures, to manage major risks of Spills and Leakage. This system is regularly inspected by the French authority and is ISO 14001 certified. The Entity conducts periodic assessments of the major risks of Spills and Leakage through various risk analyses, which are reviewed by the French authority and/or covered by the ISO 14001 certification. The Entity has implemented management plans, which are regularly reviewed to prevent, detect and remediate Spills and Leakages. Due to the safety and security risks associated with full public disclosure of the plans, only the authorities and emergency services are fully informed. Some elements are available for disclosure upon request, subject to management approval.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has implemented procedures to disclose the volume, type, and potential impact of significant Spills immediately after any incident. The Entity has implemented a process to publicly disclose significant incidents (including Spills), Impact Assessments and remediation actions taken. No significant Spills have been recorded since the Entity joined ASI.
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a Waste management system as part of its certified ISO 14001 Management System. Targets are defined and the recovery rate has improved significantly since the previous Audit. The Entity's Waste strategy has been developed in accordance with the Waste Mitigation Hierarchy. Waste management is implemented

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		according to French regulations. The Entity has assessed the impacts of its waste on human health and the environment in its health and safety risk assessment and environmental analysis. The Entity has disclosed its Hazardous and Non-Hazardous Waste quantities and disposal methods in its CSR Report 2025 (pages 43-45), and the VSME Report (page 18): https://www.aluminiumdunkerque.com/our-csr-strategy
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	All Spent Pot Lining (SPL) is stored internally within a building that incorporates appropriate containment facilities that are compliant with the Entity's permit. Based on its master plan, the Entity seeks to optimise the recovery and recycling of carbon and refractory materials from SPL. Internal processes are implemented accordingly. Whilst some components of SPL is recovered, other components are landfilled, but only after stabilisation treatment is performed by the waste contractor. The stabilisation and landfill facilities are authorised by the relevant French authority. The Entity reviews annually alternative options to landfilling of treated SPL through its management review. More frequently, the action plan is reviewed, and alternatives are discussed with external contractors. There is no discharge of SPL to freshwater, brackish water, or marine environments. This was confirmed during the Audit via a site inspection and review of waste tracking documents.
6.8a-d Dross	Conformance	The Entity stores and manages Dross in a covered area and retention pond) to prevent release into the environment. The Entity seeks to maximise the recovery of Aluminium contained in Dross and Dross residues, through internal processes such as a Dross press, and external refiners. The Entity maximises the recycling of treated Dross residues, as there is no landfilling of Dross residues. All Dross residues are recovered as confirmed by waste tracking documents.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity has identified and monitored its water withdrawal and use by source and type. Water is mainly used for industrial backup water for the closed cooling circuit. The Entity has assessed the water-related risks within its Area of Influence (i.e. Watersheds of the plant area and loading dock). The assessment demonstrated a high-risk level, which is consistent with the high expectations of local authorities regarding water, its management, and the local context. The Entity discloses water withdrawal and uses by source and type, and related risks in its CSR Report 2025, pages 70-73: https://www.aluminiumdunkerque.com/our-csr-strategy
7.2a-e Water Management	Conformance	The Entity has implemented a Water Management Plan with time-bound targets developed in conjunction with the requirements of local authorities and organisations. It is reviewed annually and in case of significant change or indication of a control gap.

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		The Entity has disclosed the latest version of the management plans in the CSR Report 2025, page 72: https://www.aluminiumdunkerque.com/our-csr-strategy
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the risks and impacts on Biodiversity within its Area of Influence (limited to the plant and the loading dock of the harbour) based on a comprehensive study performed in 2023-24. The Biodiversity specialist that supported the impact assessment identified water use and the preservation of sandy areas as the most important elements and as high risk.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity has assessed through a comprehensive Biodiversity study, that it contributes to impacts on Ecosystem Services, primarily the provisioning services of water resources. A review with an environmental association has been performed. The use of water is regularly discussed with authorities and other local Stakeholders.
8.2a-g Biodiversity Management	Conformance	The Entity has implemented a Biodiversity Action Plan with time-bound targets to address the risks/impacts identified in the Biodiversity study completed which is regularly monitored and reviewed. The Biodiversity Action Plan was developed by a Qualified Specialist, in accordance with the Biodiversity Mitigation Hierarchy and has also been communicated and discussed with local Stakeholders. The Entity also works with local authorities and local organisations (Syndicat des eaux du Dunkerquois) to reduce its water consumption. The Biodiversity Plan is publicly disclosed in the CSR Report 2025, pages 74-75: https://www.aluminiumdunkerque.com/our-csr-strategy
8.3a-c Management of Priority Ecosystem Services	Conformance	The main Priority Ecosystem Service on which the Entity depends is water resources. An action plan is implemented to reduce water consumption. For other Priority Ecosystem Services of relevance identified through the risk assessment based on the data of the previous Biodiversity studies, the Entity has implemented a Biodiversity Action Plan, according to the Biodiversity Mitigation Hierarchy.
8.4 Alien Species	Conformance	The Entity has conducted a comprehensive Biodiversity study, which identified Alien Species present on-site. Various actions are implemented and scheduled to control these Alien Species. Furthermore, the Entity takes preventive actions (such as fumigation) to avoid the further introduction of Alien Species at the Facility.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is not located near any World Heritage Properties (https://whc.unesco.org/fr/list). There are no current or future projects that could impact World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity has identified Protected Areas within its Area of Influence, and the Facility is not located within a regulatory Protected Area. There are some Protected Areas within a ten-kilometre radius of the Entity. The plant is located in the National Area of Ecological, Faunistic and Floristic Interest (ZNIEFF) area 'la Plaine maritime flamande entre

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		Watten, Loon-Plage et Oye-Plage', which is an area of interest with respect to fauna and flora and without regulatory constraints. Whilst there is no requirement for the development of management plans associated with the nearby Protected Areas or the ZNIEFF area, the Entity has implemented a Biodiversity Action Plan to address the protection of notable species within its Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	The Entity commits to respecting Human Rights and observing the UN Guiding Principles on Business and Human Rights and has documented this commitment in gender-responsive documents including the General Code of Conduct and the Responsible Supply Charter, available at: https://www.aluminiumdunkerque.com/suppliers-and-services These documents are reviewed at least every five years and in case there is a significant change or indication of a control gap. The Entity has implemented a gender-responsive Due Diligence process to assess, prevent, mitigate, and account for its current and potential impacts on Human Rights. The Due Diligence process considers Legacy Impacts and is regularly reviewed. The mapping and consultation of Stakeholders are included in the process. Various risk assessments, controls, and reviews are performed. If necessary, mitigation plans are activated and then followed up. There is no significant case of having caused or contributed to adverse Human Rights impacts at the Entity or within the supply chain.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity commits in its Code of Conduct to prohibit all forms of Discrimination, including that based on gender. There is a company agreement regarding equal rights for men and women. Female Worker interviews confirmed the strong commitment of the Entity towards women's rights. The Entity has implemented a program promoting gender equity and women's empowerment that addresses barriers to professional development, Discrimination, Violence and Harassment. The Entity publicly discloses the effectiveness of the measures taken to promote gender equity in the CSR Report 2025 (pages 58-59) and VSME Report 2025 (pages 20-23), available at: https://www.aluminiumdunkerque.com/our-csr-strategy
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in the area (Northern France).
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in the area (Northern France).

CRITERION	RATING	COMMENT
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	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in the area (Northern France).
9.5a Cultural and Sacred Heritage - Identification	Conformance	The Entity's plant is not located in any area with sacred or cultural heritage sites or values, according to both the Monumentum website (https://monumentum.fr) and the World Heritage list.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples present in the area (Northern France).
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as it is located in an industrial zone and does not have any New Projects or Major Changes that may cause displacement and/or resettlement.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is committed to respecting the legal and customary rights and interests of Local Communities. According to the Entity's risk assessment, there is no rural/remote Community dependent upon resources that may be affected by the Entity's operations. The Entity has implemented community engagement approach with several mechanisms existing to engage with Local Communities and their representatives when concerns are raised. The Entity's risk assessment process has not identified issues affecting Local Communities. However, the Entity supports the Local Communities through various partnerships (e.g. education, sports, culture, and environment). This action plan is regularly reviewed. The Entity discloses its actions in the CSR Report 2025, pages 60-69: https://www.aluminiumdunkerque.com/our-csr-strategy
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity has established a robust Management System to avoid any involvement in armed conflicts or Human Rights abuses. This includes a clear policy position in its Code of Conduct and its Sustainable Procurement Charter, the definition of responsibilities and allocation within the Procurement Team, a documented Due Diligence procedure, the collection of supplier information through the Heidelberg Conflict Barometer and supplier questionnaires, and a Grievance Mechanism.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented a Due Diligence procedure that includes the identification and assessment of Conflict-Affected and High-Risk Areas (CAHRAs) risks in its supply chain. All main suppliers have been assessed for risk, considering the Heidelberg Conflict Barometer, responses to questionnaires sent to these suppliers, and the ASI certification status of Aluminium suppliers.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a Due Diligence procedure that includes the way to respond to identified CAHRAs risks in its Aluminium supply chain. A mitigation plan is implemented and reviewed regularly.

CRITERION	RATING	COMMENT
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence processes were included in the scope of this ASI Performance Standard Certification Audit and addresses this requirement.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity reports annually on its supply chain Due Diligence in the CSR Report 2026, pages 41-42: https://www.aluminiumdunkerque.com/our-csr-strategy The status and outcome of the Entity's relevant Alumina refiners and bauxite mines supply chain Due Diligence is not however detailed in the report.
9.9 Security practice	Conformance	The Entity has an internal security officer and employs an external private security provider. The Entity has an internal security officer and employs an external private security provider to verify the entries to and exits off-site. Regular verifications are undertaken to ensure all security staff members have their national authorisations, which are 'up to date'. Security provider personnel are not armed, and no complaints against security agents have been received.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the Freedom of Association and the rights of Workers to Collective Bargaining. A specific agreement with Labour Unions exists at the Entity. The Entity participates in good faith in its implementation. A decision to join a Labour Union is made solely by the Worker. Labour Unions are free to organise, elect their representatives and collectively bargain on behalf of Workers. Interviews with managers, Workers and Workers representatives confirmed these elements.
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 the right to Freedom of Association and Collective Bargaining is not restricted in France.
10.2a-c Child Labour	Conformance	The Entity strictly prohibits Child Labour that is not in accordance with the law and conventions of the International Labour Organisation, as documented in its Code of Conduct and Responsible Supply Charter. These documents are available at: https://www.aluminiumdunkerque.com/suppliers-and-services While the minimum working age in France is 15 years, the Entity requires a minimum working age of 18 years.
10.3a-c Forced Labour	Conformance	The Entity strictly prohibits Forced Labour, as documented in its Code of Conduct and Responsible Supply Charter. These documents are available at: https://www.aluminiumdunkerque.com/suppliers-and-services A Due Diligence process regarding Forced Labour is also implemented regarding suppliers. The Entity has implemented practices to prevent any direct or indirect practices related to Forced Labour, including Debt Bondage, Human Trafficking, and retention of identity papers. Interviews and site inspection confirmed that there are no Forced Labour or related practices at the Facility.

CRITERION	RATING	COMMENT
		The Entity has publicly disclosed a Modern Slavery Statement in its CSR Report 2025, page 42: https://www.aluminiumdunkerque.com/our-csr-strategy
10.4a-c Non-Discrimination	Conformance	The Entity has documented its commitment to equal opportunities and zero tolerance to Discrimination in its Code of Conduct: https://www.aluminiumdunkerque.com/our-csr-strategy Job appraisals are performed during annual performance reviews with objective criteria. Differences are analysed periodically with the Workers' representative to correct potential discrepancies. The Entity promotes a culture of non-Discrimination through various communication and training There has been no recent case of Discrimination recorded at the Entity.
10.5 Communication and engagement	Conformance	The Entity has an open and inclusive communication process between management, Workers, and Workers' representatives to discuss working conditions, workplace, and compensation issues. This allows concerns to be raised, non-conformities to be reported, and suggestions for improvement.
10.6a-g Violence and Harassment	Conformance	In consultation with Workers and their representatives, the Entity has implemented a Code of Conduct and internal rules regarding Violence and Harassment. The Code prohibits the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual Harassment, or verbal abuse of Workers. The Code of Conduct is regularly reviewed (at least every five years and in case of significant change or indication of control gap) and is publicly disclosed at: https://www.aluminiumdunkerque.com/our-csr-strategy Violence and Harassment risks are included in the Entity's risk assessment and improvement actions have been implemented. The Entity provides regular information and training on Violence and Harassment risks and prevention/protection measures, and all employees have received training, with four employees have been nominated as Violence/Harassment contact persons.
10.7a-d Remuneration	Conformance	The Entity ensures that Workers have a written, understandable work contract. Wages are defined by French regulations, the collective agreement of the chemical industry and Company agreements. Wages exceed the legal minimum standard and respect the industry minimum standard. The Entity makes monthly wage payments according to French regulations and in a punctual manner. All Workers receive payslips with payment details. The Entity pays a premium of at least the equivalent of 25% for work exceeding 35 hours per week as defined by French law.
10.8a-c Working Time	Conformance	The Entity complies with French Applicable Law and the collective agreement of the chemical industry on Working Time, Overtime working hours, public holidays and paid annual leave. Company agreements regarding Working Time and shorter working hours also exist. A time Management System has been implemented to follow up on any Overtime working hours and paid leave. The Entity ensures Workers receive an average of one day off per seven-day period, and

CRITERION	RATING	COMMENT
		a less than eight-hour workday on average over a six-month period, as checked in the time Management System.
10.9a-b Informing Workers of Rights	Conformance	The Entity regularly informs Workers of their Rights through the onboarding process, various internal communication channels, and the Human Resources team. Workers' representatives also play an important role in relaying information to Workers about their Rights.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has documented and implemented an Occupational Health and Safety (OH&S) Management System. The System is not certified; however, it contains the main components of a system consistent with international Standards. The Management System is applicable to all Workers and Visitors. Some elements of the System (including the definition of a five-year vision for OH&S and the performing of various external audits) have been significantly improved since the previous ASI Audit.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The OH&S Management System is reviewed quarterly via safety reviews and more comprehensively annually and considers any significant changes or indications of a control gap. Several leading and lagging indicators are also reviewed. The public disclosure of these indicators, as well as the comparative analyses of performance with peer businesses are detailed in the CSR Report 2025, pages 53 and 84-85: https://www.aluminiumdunkerque.com/our-csr-strategy
11.2 Employee engagement on Health and Safety	Conformance	The Entity provides Workers with various mechanisms to discuss and participate in the resolution of OH&S issues with management, including a joint Health and Safety Committee for Workers as well as a Health and Safety Committee for primary contractors.

ASI LIMITATION OF LIABILITY DISCLAIMER

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	3 August 2020	Issued (Initial Certification Audit)
1	25 November 2021	Surveillance Audit; Update to Member Name and Entity Name to reflect change in ownership of the Entity; Corrected the date of the Initial Certification Audit in the Audit Scope description.
2	30 June 2023	Re-Certification Audit and Scope Change – Full Certification; Scope Change to apply V3; Minor editorial changes to the Audit Scope description for the Certification Audit and Surveillance Audit.
3	22 May 2025	Surveillance Audit Correction to 8.1b and 8.3a-c in Rev 2 to 'Conformance' (from 'Not Applicable').
4	25 June 2026	Re-Certification Audit – Full Certification