ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

CONSTELLIUM SE Europe and North America

CERTIFICATE NUMBER
38

ASI STANDARD
PERFORMANCE STANDARD (V3.1 2023)

CERTIFICATION LEVEL
FULL CERTIFICATION

ASI ACCREDITED AUDITING FIRM
DNV BUSINESS ASSURANCE SERVICES UK LTD.

DATE OF ISSUE
28 JULY 2024

DATE OF EXPIRY
27 JULY 2027

CERTIFIED SINCE
28 JULY 2019

AUTHORISED BY



Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

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

CERTIFICATION SCOPE

Constellium activities in Europe and North America including the head office of CONSTELLIUM SE in Paris (France), and the sites of Astrex (Canada), Bowling Green (USA), Chippis (Switzerland), C-TEC (France), Dahenfeld (Germany), Děčín (Czech Republic), Gottmadingen (Germany), Issoire (France), Levice (Slovakia), Montreuil-Juigné (France), Muscle Shoals (USA), Neuf-Brisach (France), Nuits-Saint-Georges (France), Ravenswood (USA), San Luis Potosi (Mexico), Sierre extrusion (Switzerland), Sierre Plate (Switzerland), Singen Extrusion (Germany), Singen Rolled Products (Germany), Steg (Switzerland), Van Buren (USA), Vigo (Spain), White (USA) and Zilina (Slovakia).

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Constellium
ENTITY NAME	CONSTELLIUM SE Europe and North America
CERTIFICATION SCOPE	Constellium activities in Europe and North America including the head office of CONSTELLIUM SE in Paris (France), and the sites of Astrex (Canada), Bowling Green (USA), Chippis (Switzerland), C-TEC (France), Dahenfeld (Germany), Děčín (Czech Republic), Gottmadingen (Germany), Issoire (France), Levice (Slovakia), Montreuil-Juigné (France), Muscle Shoals (USA), Neuf-Brisach (France), Nuits-Saint-Georges (France), Ravenswood (USA), San Luis Potosi (Mexico), Sierre extrusion (Switzerland), Sierre Plate (Switzerland), Singen Extrusion (Germany), Singen Rolled Products (Germany), Steg (Switzerland), Van Buren (USA), Vigo (Spain), White (USA) and Zilina (Slovakia).
SUPPLY CHAIN ACTIVITIES	• Aluminium Re-melting/Refining • Casthouses • Semi-Fabrication • Material Conversion
ASI STANDARD	• Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (9 – 10 May 2019) • Re-Certification Audit (11 – 15 July 2022) • Re-Certification Audit and Scope Change (3 October 2023 – 2 April 2024) • Surveillance Audit (28 April – 22 May 2026)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	• 9 – 10 May 2019 (Initial Certification Audit) • 11 – 15 July 2022 (Re-Certification Audit) • 3 October 2023 – 2 April 2024 (Re-Certification Audit and Scope Change) • 28 April – 22 May 2026 (Surveillance Audit)
AUDIT REPORT SUBMISSION	• 26 June 2019 (Initial Certification Audit) • 12 October 2022 (Re-Certification Audit) • 31 May 2024 (Re-Certification Audit and Scope Change) • 29 September 2026 (Surveillance Audit)
AUDIT SCOPE	Initial Certification Audit (9 – 10 May 2019) Rolling mill and casthouse facilities of the Constellium Singen P&ARP site (Germany). Supply chain activities included in the Audit Scope: • Casthouses • Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Re-Certification Audit (11 – 15 July 2022)

Rolling mill and casthouse facilities of the Constellium Singen P&ARP site (Germany).

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Re-Certification Audit and Scope Change (3 October 2023 – 2 April 2024)

The Audit Scope included the Head Office of CONSTELLIUM SE (France) and Děčín (Czech Republic), Neuf-Brisach (France), Ravenswood (USA), San Luis Potosi (Mexico) and Vigo (Spain). Criteria identified as Non-Conformities from the previous Certification Audit for the Muscle Shoals (USA) site were audited remotely.

The Entity uses the ASI multi-site sampling approach to include Astrex (Canada), Bowling Green (USA), Chippis (Switzerland), C-TEC (France), Dahenfeld (Germany), Gottmadingen (Germany), Issoire (France), Levice (Slovakia), Montreuil-Juigné (France), Nuits-Saint-Georges (France), Sierre extrusion (Switzerland), Sierre Plate (Switzerland), Singen Extrusion (Germany), Singen Rolled Products (Germany), Steg (Switzerland), Van Buren (USA), White (USA) and Zilina (Slovakia).

Constellium's existing ASI Certified Facilities have been transferred to this Business-level Certification, including Neuf-Brisach (France) (Certificate 83), Dahenfeld, Gottmadingen and Singen Extrusion (Germany) (Certificate 99), Děčín (Czech Republic) (Certificate 284) and, Bowling Green and Muscle Shoals (USA) (Certificate 290). This included transfer of the supply chain activities of Aluminium Re-melting/Refining and Material Conversion.

Supply chain activities included in the Audit Scope:

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

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (28 April – 22 May 2026)

The Audit Scope uses the ASI multi-site sampling approach to include Montreuil-Juigné (France), Singen Extrusion (Germany), Singen Rolled Products (Germany) and Van Buren (USA), Bowling Green (USA), Decin (Czech Republic), Corporate (France), Ravenswood, (USA) and San Luis Potosi (USA).

Supply chain activities included in the Audit Scope:

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

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME	• Certification
GHG PERFORMANCE EXEMPTION	The Entity has been approved for an exemption relating to its GHG emissions performance under Criteria 5.3a and/or 5.4. Under this exemption, Major Non-Conformance(s) will not count towards any Provisional Certification status, and

	the Entity must develop Corrective Action Plans and demonstrate progress over time.
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	28 July 2024 – 27 July 2027
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	27 July 2027
CERTIFICATE NUMBER	38
	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

Constellium is a global leader in the development, manufacturing, and recycling of Aluminium products and solutions. Constellium designs and manufactures advanced alloys and engineered solutions for a range of applications, such as beverage cans, cars, and airplanes. They are a public company listed on the New York Stock Exchange (NYSE: CSTM). Constellium operates 25 manufacturing sites in Europe, North America, and China, three Research and Development (R&D) centres, has approximately 12,000 employees and in 2025 generated approximately €7.5 billion (bn) in revenue.

Constellium Europe and North America (the 'Entity') includes the Paris headquarters and a total of 24 industrial, R&D and corporate office sites across Europe and North America. The Entity is structured around three business units: Aerospace and Transportation (A&T), Packaging and Automotive Rolled Products (P&ARP), and Automotive Structures and Industry (AS&I).

Further information about the Entity is available on the Constellium website: https://www.constellium.com/about-us

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented processes that includes a legal register, that facilitates for adequate awareness of legal requirements to ensure Compliance with Applicable Laws and regulations. Legal developments are systematically monitored, and competent legal advice is available (Corporate supports each site with legal counsel). The Entity holds ISO 14001, ISO 50001 and ISO 45001 certifications from an accredited certification body, and site-level compliance is monitored at the Constellium Corporate level. The Entity's corporate governance approach is disclosed in Constellium's 20-F SEC Filing, Item 16G Corporate Governance in its Annual Report (published each year in March). Refer to: https://www.constellium.com/investors/sec-filings The Entity maintains an environmental, health and safety compliance obligations matrix which was reviewed for target setting for 2025/26. For further information on the Entity's corporate governance approach, refer to: https://www.constellium.com/investors/governance
1.2 Anti-Corruption	Conformance	The Entity has established a robust system to ensure ethical business conduct, which is based on the French law Sapin II, including requirements of the anti-Corruption management system. Various internal institutions oversee business ethics and compliance including the Audit Committee of Board of Directors, Compliance Committee, Internal Audit Committee. The Corporate Code of Employee and Business Conduct covering business ethics has been issued (available also in local language): https://www.constellium.com/sustainability/policies-reports-and-certifications Anti-Corruption principles are included in both the Code of Conduct and Supplier Code of Conduct. The Entity has an 'Integrity Hotline' which is an anonymous platform to confidentially report any issues or concerns related to anti-Corruption and Bribery allegations in a confidential manner. Constellium's Audit Committee oversees compliance with the Constellium Code of Conduct, and any reported whistleblowing cases. The Committee's Charter is available at: https://res.cloudinary.com/constellium/image/upload/v1663769260/PDF%20documents/Governance/audit_committee_charter_sep_2021_d9pp2h.pdf The Entity reports on anti-Corruption in its 2022 Sustainability Report, as per 'GRI 205 Anti-corruption', pages 12 and 64. Training and communication on the Code of Conduct, and anti-Corruption and Bribery awareness is disclosed on page 15: https://www.constellium.com/sustainability/policies-reports-and-certifications
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance. The Constellium Code of Conduct can be accessed at: https://res.cloudinary.com/constellium/image/upload/v1682075890/PDF%20documents/Policies%20and%20Certifications/Code%20of%20Co

CRITERION	RATING	COMMENT
		nduct%20-%202019/constellium_codeofconduct-2019-en-web_r0lnzg_xfoeck.pdf The Supplier Code of Conduct is available at: https://res.cloudinary.com/constellium/image/upload/v1705497008/PDF%20documents/Policies%20and%20Certifications/Supplier%20Code%20of%20Conduct/2024/EN_Constellium_Supplier_Code_of_Conduct_-_2024_01_xz7nhc.pdf Constellium reports on Group-level compliance training levels in the 2025 Sustainability Report: https://www.constellium.com/sustainability/policies-reports-and-certifications Site-level implementation of the Criteria was evaluated during the Audit.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented and maintains Policies consistent with the requirements of the ASI Performance Standard, including the Constellium EHS Policy and Human Rights Policy and Labour Practices: https://www.constellium.com/sustainability/downloads/policies-codes-conduct The Policies are the subject of periodic employee training and are endorsed by senior management, at Chief Executive Officer-level. Constellium is a public company, accountable to shareholders, the Board of Directors and Committees, and the global Code of Conduct. The Board of Directors is collectively responsible for the management of the company, the general conduct of the Entity's business and its corporate governance structure. The Non-Executive Directors supervise and provide guidance to the Executive Director, who is entrusted with the day-to-day management of the company. Most of the Entity's locations hold and maintain ISO 14001, ISO 50001 and ISO 45001 certified Management Systems by an accredited third party, an overview of which is available at: https://www.constellium.com/sustainability/policies-reports-and-certifications
2.2a-c Leadership	Conformance	Constellium's Vice President Group Sustainability & Public Affairs Europe ('VP Group Sustainability') is responsible for leading the implementation and communication of ASI Certification for the Entity (and the Constellium Group). At Board Level, the ASI Certification Status of the Entity is monitored by the Safety & Sustainability Committee and is reviewed at least twice a year. Training on the ASI Performance Standard is organised for each function and each business unit, which cascade to the local teams.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity's manufacturing sites are all ISO 14001 certified. Further information on the Entity's EHS Policy implementation is disclosed in the 2025 Sustainability Report, page 40. The percentage of Constellium's manufacturing sites that have ISO 14001 certification is a performance indicator that has been independently assured (see page 86 of the 2025 Sustainability Report for PwC's independent assurance statement). The Sustainability Report is available at: https://www.constellium.com/sustainability/policies-reports-and-certifications

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems - Social	Conformance	All the Entity's manufacturing sites are certified against both ISO 14001:2015 and ISO 45001:2018. In addition, the Entity has processes and procedures in place that address Human and Labour Rights, community engagement and sustainability. Social management programs are outlined in the Constellium 2025 Sustainability Report, from page 45: https://www.constellium.com/sustainability/policies-reports-and-certifications As one example, the Ravenswood Facility has identified social impacts from a Human Rights scoping review. Relevant social performance indicators are monitored at a site level and trainings on labour and Human Rights are provided to Workers. An Impact Assessment procedure ensures that any social, labour and Human Rights impacts are identified and mitigated for New Projects or Major Changes.
2.4a-e Responsible Sourcing	Conformance	Constellium established a Responsible Supply Chain Management Policy in 2018, which was last revised in late 2023. The Entity has implemented this Policy and responsible sourcing implementation updates are disclosed in the 2025 Sustainability Report, pages 55-56, which is available at: https://www.constellium.com/sustainability/policies-reports-and-certifications The Supplier Code of Conduct is also available on the Entity's website in different languages. The Entity has a key performance indicator of 'The "% of key and high-risk suppliers that signed the Supplier Code of Conduct", which has been independently assured as part of PwC's independent assurance statement for the 2025 Sustainability Report, pages 82 and 88.
2.5a-g Environmental and Social Impact Assessments	Conformance	At Constellium's corporate level, the evaluation of environmental and social impacts is incorporated into the capital expenditure (CAPEX) process. The related Policy document is revised every five years and underscores the imperative of conducting comprehensive Environmental and Social Impact Assessments for Major Projects. At the Neuf-Brisach manufacturing site, the Facility underwent a permitting process in 2022 for a new recycling plant, FD6, with 130,000 metric tonnes of planned recycling capacity by the end of 2024. An Environmental Impact Assessment (EIA) was submitted in 2022, and the document underwent a month-long public inquiry period and was made available on the Prefecture's website. No significant environmental risks were identified as part of the 2022 EIA. The Social Impact Assessment for this project was disclosed to the Sites Monitoring Commission ('Commission de Suivi de Site', CSS). The Commission included relevant representatives from both the administration and civil society (neighbouring towns, local associations, employees).
2.6a-h Human Rights Impact Assessment	Conformance	The Entity has conducted site-level Human Rights risk assessment workshops at some of their manufacturing sites, including Singen, Neuf-Brisach, Děčín, Levice, Žilina, Muscle Shoals, Ravenswood, White, Van Buren, Bowling Green, and San Luis Potosí. A global workshop with leadership from different key functions discussed the risks and a Human Rights 'Heat Map' was produced. Constellium has completed a first phase of a company-wide Human Rights Due Diligence process, which has enabled the identification of salient Human Rights risks.

CRITERION	RATING	COMMENT
		A Human Rights Impact Assessment was undertaken for the Neuf-Brisach recycling plant, FD6. Consultation with external Stakeholders is managed through the CSS. The CSS is a legal requirement and is organised by the Prefecture. Its role is to monitor and report the local impacts of the site's activity. External Stakeholders are active contributors to the CSS meetings. The Commission's participants include the Neuf-Brisach site's elected employee representatives, the Mayor's office, the regional Authority for Environmental and Urbanism Management (Directions Régionale de l'Environnement, de l'Aménagement et du Logement - DREAL), and neighbouring community groups. The commencement of any Major Project is always consultative with the local population as there is a legal requirement to undertake public consultation, 'Enquête Publique', in the surrounding towns, before the project. The duration of this consultation is typically two months.
2.7a-f Emergency Response Plan	Conformance	The Entity has site-specific Emergency Response Plans (ERPs) developed in collaboration with relevant Stakeholders such as the neighbouring companies, community and relevant authorities (e.g. fire brigade, civil protection). The Entity also holds ISO 14001 certification for its Facilities, which are current to the Entity's Certification Scope. The Entity has developed its site-specific ERPs (internal operational plan, continuity plans) in collaboration with potentially affected Stakeholders. Regular drills are performed. The Entity currently operates two Seveso industrial sites, with one classified as upper tier (i.e. high-risk). All site ERPs are available upon request.
2.8a-d Suspended Operations	Conformance	The Entity's sites prepare their own Business Continuity Plans, which include scenarios of suspended operations or significant alterations to business operations. As part of the Constellium Enterprise Risk Management process, the internal audit function confirms that Business Continuity Plans are regularly updated and prepared by local sites. Performance against these requirements is regularly presented to the Executive Committee.
2.9a-b Mergers and Acquisitions	Conformance	Mergers and acquisitions are managed at the corporate level, governed by Constellium's Environmental, Social and Governance (ESG) Due Diligences for Mergers and Acquisitions (M&A), Closure, Decommissioning, and Divestment Processes Policy, available at: https://www.constellium.com/investors/governance Board approval is required for Material business acquisition, merger or divestment. In such a case, an ESG Due Diligence process is activated, as described in the EHS First Manual and the ESG Due Diligence Policy. There are no recent examples of mergers and acquisitions.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity systematically reviews ESG issues as part of the Entity's Due Diligence processes, including the ESG Due Diligences for Mergers and Acquisitions (M&A), Closure, Decommissioning, and Divestment Processes Policy. The Policy is available at: https://www.constellium.com/investors/governance Environmental Impact Assessments, Social Impact Assessments and consultations with the European Works Council were reviewed during the Audit for recent divestments, including the sale of Constellium Extrusion Plants in Germany and the sale of Ussel in France. For more information, refer to:

CRITERION	RATING	COMMENT
		https://www.constellium.com/news/constellium-sells-its-facility-in-ussel-france-to-noe-industries https://www.constellium.com/news/constellium-to-sell-three-german-extrusion-plants-to-vaessen-aluminium
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity has publicly disclosed its governance approach and its Material environmental, social and economic impacts in the annual Constellium Sustainability Report, (on pages 13-14 for the 2025 Report), which is based on the Global Reporting Initiative (GRI) Guidelines and UN Global Compact principles. The GRI Content Index is referenced in the 2025 Sustainability Report, pages 73-81. An independent assurance statement of selected ESG information disclosed in the Report is available on pages 86-88. The 2025 Sustainability Report is available at: https://www.constellium.com/sustainability/policies-reports-and-certifications
3.2 Non-compliance and Liabilities	Conformance	Non-compliance and liabilities are disclosed in the annual Sustainability Report: https://www.constellium.com/sustainability/policies-reports-and-certifications The GRI Content Index in the 2025 Sustainability Report (from page 73) indicates there were no significant non-compliance or liabilities recorded in the reporting period.
3.3a-c Payments to Governments	Conformance	The Entity has 'zero tolerance' toward any form of Bribery and Corruption, in line with all Applicable Laws (including the U.S. *Foreign Corrupt Practices Act*, the U.K. *Bribery Act* and the French Law Sapin II). Both periodic compliance with the *Sarbanes-Oxley Act* audits and internal financial auditing are conducted. The effectiveness of the Entity's internal control over financial reporting has been audited by an independent registered public accounting firm (PricewaterhouseCoopers). The Constellium Audit Committee oversees the processes and the results, as outlined in the Audit Committee Charter. Payments to government are publicly disclosed in the 2025 Sustainability Report as per the GRI 415-1, page 81: https://www.constellium.com/sustainability/policies-reports-and-certifications
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a series of mechanisms for raising stakeholder grievances including the potential for anonymous reporting via its independently managed 'Integrity Hotline'. The Entity tracks grievances raised and reviews the mechanism for effectiveness. The Integrity Hotline is an anonymous platform used to report any ethical issues in a confidential matter, available at: https://www.constellium.com/integrity-hotline At a Corporate-level, Constellium conducts regular Stakeholder engagement and Materiality assessments. Details of their latest review is available in the Sustainability Report, available at: https://www.constellium.com/sustainability
4. Material Stewardship		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment	Conformance	Constellium has conducted cradle-to-gate Life Cycle Assessment (LCA) evaluations on its primary Product lines, encompassing beverage cans, automotive parts, and crash management systems. The Entity has taken measures to ensure the integrity and accuracy by using third party LCA experts to verify the methodology. Constellium's global LCA model calculates the carbon footprint and other environmental impacts from different life cycle phases of a Product or activity, according to ISO 14040 and 14044 Standards. For further information, please see the 2025 Sustainability Report, page 12: https://www.constellium.com/sustainability/policies-reports-and-certifications
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity's LCA data are not publicly available but is disclosed to customers upon request. Further information on the Entity's approach to LCA studies is disclosed in the 2025 Sustainability Report, page 12: https://www.constellium.com/sustainability/policies-reports-and-certifications
4.2 Product Design	Conformance	The Entity invests in Research and Development (R&D) and has established a suite of product design objectives which include: - manufacturing lighter components for vehicles, to reduce fuel consumption - recycling pre- and post-consumer Aluminium Scrap, and to this effect, the Entity implements a 'Recycling Assessment' process which requires all new Product development to consider the possibility of increasing pre-or post-consumer Scrap as inputs. The Entity's innovation process undergoes rigorous review, ensuring alignment with sustainability goals and objectives. A dedicated sustainability check template evaluates critical areas of work, including health and safety, GHG emissions, recycling, waste generation, resource utilisation and social aspects.
4.3a-b Aluminium Process Scrap	Conformance	The Entity's manufacturing sites have implemented processes to efficiently segregate and recycle Aluminium Scrap material. The Entity procures Scrap from both customers and suppliers. The Entity tracks various types of Scrap at all sites, including internal Scrap, which is managed separately from overall recycling content accounting. Recycled content is allocated to its intended destinations, ensuring transparency and accountability. The Entity's recycling strategy and recycling targets are disclosed in the 2025 Sustainability Report, page 34: https://www.constellium.com/sustainability/policies-reports-and-certifications
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has established partnerships with their customers, and other Stakeholders to promote a Circular Economy. The Entity has disclosed its recycling strategy and targets in the 2025 Sustainability Report, page 34: https://www.constellium.com/sustainability/policies-reports-and-certifications The Entity only supplies other businesses and does not sell to end consumers. It has extended its casting and recycling Facility with a dedicated furnace to recycle not only internal Scrap but to also allow processing of customer Scrap and Post-Consumer Scrap.

CRITERION	RATING	COMMENT
		The Entity has announced that by 2030, 50% of Aluminium input will be from recycled sources. On average, recycled metal input accounted for 47% of Constellium's metal input in 2025.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has established an Aluminium recycling strategy that engages Stakeholders on different levels, markets and Product lines. For instance, Constellium is a Member of the European Aluminium Association, and are also engaged in programs aiming at data collection, raising awareness and increasing recycling rates in several application areas, including automotive and packaging. The Entity engages with collection and recycling systems at various levels to support recycling of Products at End of Life and raise awareness on recycling. For instance, the Entity is a member of the Recycling Division of the European Aluminium Association, European Aluminium Packaging Group and works with Stakeholders in the U.S. Aluminium Association to increase recycling rates of Aluminium beverage cans. Constellium is a founding member of the non-profit organisation 'Every Can Counts'. Through this organisation, the Entity is increasing the collection rate of beverage cans and as of now it is present in 19 countries. The details of the partnerships are disclosed in the 2025 Sustainability Report, from page 34: https://www.constellium.com/sustainability/policies-reports-and-certifications Furthermore, the Entity works with local organisations, such as UK-based Alupro, France Aluminium Recyclage, and Spain's Arpal, to develop and promote collection schemes, including deposit return systems, in each market.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity's Greenhouse Gas (GHG) emissions and energy use related data is gathered, calculated and disclosed at a Corporate level. The GHG emissions are publicly disclosed in the 2025 Sustainability Report, pages 29-33. Energy use per source is disclosed on page 59 (GRI section 302-1): https://www.constellium.com/sustainability/policies-reports-and-certifications The GHG emissions Scope 1, 2 and 3, and energy use by source indicators are independently assured according ISAE 3000 assurance standard by independent auditors. The Assurance Statement is disclosed in the 2025 Sustainability Report, page 86.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Major Non-Conformance	The Entity has established GHG Emissions Reduction Pathways and demonstrated performance aligned with its Scope 1 and Scope 2 pathway. Its performance against the procurement-related Scope 3

CRITERION	RATING	COMMENT
		pathway however remains above the trajectory established using the ASI GHG Emissions Pathway Method. As a result, the Entity is unable to demonstrate full conformance with the GHG emissions reduction pathway performance requirements. This is because it is recognised that the Entity is (currently) structurally limited in its ability to reduce emissions intensity in line with a GHG Emissions Reduction Pathway consistent with a 1.5ºC warming scenario. This is the first Certification Period in which the Entity has exceeded the required GHG Emissions Reduction Pathway. As per the Criteria 5.3a & 5.4 Exemption Process, both Non-Conformances are exempt from the Certification outcomes and member obligations resulting from non-conformance as outlined in the ASI Assurance Manual. It is expected that the Entity will be required to ongoing disclose its performance and to meet the other requirements of the GHG emissions related criteria and to reduce its emissions intensity (all conditions of exemption). At subsequent Audits, the Entity's ability to meet the conditions of exemption will be reviewed, should the Major Non-Conformances remain valid. Under these exemption rules, Major Non-Conformance against Criterion 5.3a or performance related elements of 5.4 will not count towards the maximum three (3) Major Non-Conformances leading to a Provisional Certification nor 3+ leading to non-issuance or revocation of a Certificate.
5.3b-e GHG Emissions Reduction Plans - Targets, review and disclosure	Minor Non-Conformance	The Entity demonstrates that Scope 1 and 2 and procurement-related Scope 3 GHG Emissions Reduction Pathways have been established using the ASI methodology. Actual performance was reviewed against the established pathways. Scope 1 and 2 performance remained below the pathway trajectory and Scope 3 performance demonstrated progress toward the pathway. The GHG Emissions Reduction Plan is reviewed annually and on any changes to the business that alter baselines or targets. The Entity publicly discloses its GHG reduction targets, baseline year and annual performance in the Constellium 2025 Sustainability Report 2025 pages 27 and 33: https://www.constellium.com/sustainability/policies-reports-and-certifications A Scope 3 GHG emissions reduction target aligned with the ASI GHG Emissions Pathway Method however has not been publicly disclosed.
5.4 GHG Emissions Management	Conformance	The Entity's major European sites have achieved and maintain ISO 50001 Energy Management Systems. Energy use data, the key contributor to the Entity's Scope 1 and 2 GHG emissions, are collected on a quarterly basis from sites, and validated at Corporate level. GHG emissions reduction against targets are quarterly reviewed during Quarterly Business Reviews.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity monitors and publishes its Material Emissions to Air in its annual Sustainability Report. Data collection is performed at all sites and gathered in a common database. The key performance indicator of 'Air emissions of Volatile Organic Compounds (VOC), oxides of sulphur (SOx), oxides of nitrogen (NOx), particulate materials per ton of

CRITERION	RATING	COMMENT
		product shipped' is independently third party assured. Constellium discloses data against GRI 305 'Emissions' in the 2025 Sustainability Report, pages 61, 67 and 78: https://www.constellium.com/sustainability/policies-reports-and-certifications An example of site-specific reporting of Emissions to Air, at the Neuf-Brisach site, in accordance with the environmental permit requirements, specific parameters must be reported. Emissions from the Casthouse and Recycling plant are among the key parameters subject to annual measurement. Relevant emissions are measured. The air emissions data undergoes rigorous verification during assurance processes to ensure accuracy and compliance. An annual calculation of air emissions data flow is conducted, with the resultant values being entered into the EHS portal for further analysis and reporting. Any instances of emissions exceeding the prescribed limits are promptly communicated to the French Prefecture, accompanied by a comprehensive Corrective Action Plan (CAP).
6.2a-g Discharges to Water	Conformance	The Entity has collected, consolidated and published information on Discharges to Water. It discloses information on water discharge against GRI 303-2 'Management of water discharge related impacts' and 303-4 'Water discharge'. Data are third party verified and disclosed in the 2025 Sustainability Report, page 65: https://www.constellium.com/sustainability/policies-reports-and-certifications The Entity discloses parameters such as Dissolved Aluminium, Total Hydrocarbon, Total Fluoride, (Biochemical Oxygen Demand 5 (BOD5), Total Suspended Solids (TSS) and Chemical Oxygen Demand (COD). Water discharge management is undertaken according to local regulations and each Facility's specific water management Policy, and is included in the ISO 14001 certification scope (as mentioned in GRI 303-2).
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The management of environmental risks is addressed comprehensively by the Entity within the framework of the Constellium Directive on Spill Containment and Countermeasures, which is available for all sites. This document was revised in 2022 and establishes the requirements for management of environmental releases to air and water and management of Waste to minimise potential environmental impacts, material losses and operational costs. Key aspects of this approach include: - Incorporation of environmental risks within the risk assessment process, which encompasses potential issues such as Spills and Leakages; - Regular monthly reporting of environmental incidents and near-miss occurrences facilitates ongoing risk monitoring; - Quarterly reviews of environmental risks and performance ensure timely adjustments and improvements; and, - As part of each sites' Emergency Preparedness and Response Plan, management plans and operational controls are readily available to local authorities as required. This operational aspect is managed at the local level, ensuring responsiveness and compliance with regulatory requirements. The Entity discloses against GRI 303-2 'Management of water discharge-related impacts' and 303-4 'Water discharge' in the 2025 Sustainability Report, page 66:

CRITERION	RATING	COMMENT
		https://www.constellium.com/sustainability/policies-reports-and-certifications
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has established a robust procedure and system to effectively communicate Spills to local authorities. This includes implementing protocols to promptly disclose significant Spills to affected parties immediately following an incident. Furthermore, the Entity has put in place a comprehensive procedure and system to communicate significant incidents, such as Spills and Leakages, to Stakeholders and local authorities. The Entity's Sustainability Report includes a section to report major or significant incidents, 'Preventing Environmental incidents', page 40: https://www.constellium.com/sustainability/policies-reports-and-certifications The Entity is reporting information relating to Spills in line with GRI 303-2 'Management of water discharge-related impacts' and GRI 303-4 'Water discharge'.
6.5a-c Waste Management and Reporting	Minor Non-Conformance	The Entity is managing Waste as per the Waste Mitigation Hierarchy, reporting in accordance with GRI 306-3 'Waste generated' and discloses its Waste management approach in the 2025 Sustainability Report, page 64: https://www.constellium.com/sustainability/policies-reports-and-certifications Waste generated is within the independent assurance scope of the report, as indicated in the independent assurance statement, pages 86-88. Hazardous and Non-Hazardous Waste categories are defined in accordance with the definition outlined in the EU Waste Framework Directive and harmonised with the U.S. waste classification. The Entity has established a comprehensive procedure and system on emergency preparedness and crisis management which prescribes the need for disclosure in case of significant environmental incident. The risk assessment for the Van Buren site does not however address impacts of Waste in its Area of Influence, and there is no evidence that a formal Waste Management Plan is in place, designed in accordance with the Waste Mitigation Hierarchy.
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Constellium Management of Wastes and Environmental Releases Directive details the Entity's requirements for management of environmental releases to air and water and the management of Waste to minimise potential environmental impacts, material losses and operational costs. The directive specifies that the sites should maintain records on the type of Waste, quantities, Waste source, storage method and location, Waste disposal method (i.e. treatment, recycling, landfill and incineration), type of landfill material (inert, reactive), and authorised waste management companies approved by each site. The Entity has implemented processes to maximise the recovery of Aluminium by treatment of Dross and Dross residues. All Dross is

CRITERION	RATING	COMMENT
		gathered, segregated per alloy group and recycled internally or externally. No Dross is landfilled. The Entity reports information on Waste generation in line with GRI 306 'Waste; in the 2025 Sustainability Report, page 64: https://www.constellium.com/sustainability/policies-reports-and-certifications
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity's water withdrawals are summarised in the 2025 Sustainability Report and as per GRI requirements, pages 40-42 and 65: https://www.constellium.com/sustainability/policies-reports-and-certifications Water withdrawal data are collected at site level and consolidated at Group level. The data is assured by an independent third party. The Entity has established an internal Policy document on resource management which includes water and all types of water withdrawal which was signed in 2023. The Entity has also performed water risk assessments based on the online WRI Aqueduct tool. The Entity's reporting is aligned with GRI 303 'Water and Effluents', and the water-related data is available in the 2025 Sustainability Report, page 65: https://www.constellium.com/sustainability/policies-reports-and-certifications
7.2a-e Water Management	Conformance	The Entity has corporate Policies and Procedures in place for efficient use of water, with the objective to foster a systematic approach to resource management within the Entity, utilise effective Management Systems and strive for continual improvement in EHS performance. The majority of the Entity's sites monitor their water consumption at least once per quarter, and are seeking to improve their measurement systems. The Ravenswood site has established a Water Management Plan that includes water intake and withdrawal monitoring. Risk assessment for the Watershed is performed through the ISO 14001 aspects and impacts management mechanisms. In 2025, water withdrawal from areas with water stress, according to the WRI Aqueduct Water Risk Atlas, totalled 54.4 megalitres (ML). The Entity's reporting is aligned with GRI 303 'Water and Effluents', and water-related data is included in the 2025 Sustainability Report, pages 40-42, 65 and 77: https://www.constellium.com/sustainability/policies-reports-and-certifications
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has corporate Policies and Procedures in place that addresses Biodiversity and Ecosystem Services risk assessment. The latest version of the document was reviewed in 2023. This document establishes the Entity's management requirements to protect ecosystems, habitats and species related to the footprint or an Area of Influence. Biodiversity assessments are conducted for all sites. During the Audit, the Table of Biodiversity Assessments was reviewed. The Entity

CRITERION	RATING	COMMENT
		conducted a global Integrated Biodiversity Assessment Tool (IBAT) review to identify and assess relevant Biodiversity and Ecosystem Services risks, while on-site biodiversity assessments are undertaken by qualified third-party consultants. Further information relating to Biodiversity is disclosed in the 2025 Sustainability Report, pages 40-42: https://www.constellium.com/sustainability/policies-reports-and-certifications Where Impact Assessments identify potential impact, measures are implemented to mitigate risks to the ecosystem.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	The Entity addresses the Biodiversity and Ecosystem Services risk assessment with appropriate Policies and Procedures, for the protection of ecosystems, habitats, and species within its footprint or Area of Influence which align to the ASI Performance Standard requirements and IUCN (International Union for Conservation of Nature) Red List of Threatened Species and the Integrated Biodiversity Assessment Tool (IBAT). Details of its Biodiversity risk assessments have been publicly disclosed on in the 2025 Sustainability Report, pages 40-42: https://www.constellium.com/sustainability/policies-reports-and-certifications A Priority Ecosystem has been identified at the Neuf-Brisach site, particularly related to the expansion of the recycling plant for which the Facility has disclosed a detailed management plan to the authorities.
8.2a-g Biodiversity Management	Conformance	The Entity has undertaken Biodiversity risk assessments at all of its Facilities, with some sites implementing a Biodiversity Action Plan to address potential Material risks and impacts. The Entity's Facilities that were determined to have no or low risks or potential impacts on Biodiversity and Ecosystem Services have not developed a Biodiversity Action Plan, whilst those Facilities where risks have been identified, Biodiversity Action Plans have been developed and implemented. Further information on Biodiversity is also discussed in the 2025 Sustainability Report, pages 40-42: https://www.constellium.com/sustainability/policies-reports-and-certifications
8.3a-c Management of Priority Ecosystem Services	Conformance	The Entity, a manufacturer of semi-finished Products, maintains a low overall Biodiversity impact. Despite this, a Biodiversity assessment was conducted to identify specific risks within Biodiversity and Priority Ecosystems. The Entity has identified potential Biodiversity impacts from the operations at the Neuf-Brisach site on nearby ecosystems, particularly due to the discharges into the Rhine River and the nearby forest area. As required, the Facility closely monitors discharge levels and enforces strict controls and discloses information to local authorities in accordance with Applicable Laws. For risks related to the forest, the Entity has submitted a comprehensive management plan to the Prefecture.
8.4 Alien Species	Conformance	The Entity has established Policies and Procedures to effectively manage Alien Species. Through site-specific risk assessments, potential risks are identified and targeted measures are implemented

CRITERION	RATING	COMMENT
		to address the risks accordingly. The Entity has introduced a specific directive and guidance document. The Entity's sites assess the Species Threat Abatement and Restoration (STAR) indicator from the Integrated Biodiversity Assessment Tool (IBAT) and determined measures to be taken. Additional information on the Entity's Policies and initiatives relating to Biodiversity is included in the 2025 Sustainability Report: https://www.constellium.com/sustainability/policies-reports-and-certifications
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has identified a few sites in proximity to World Heritage Properties; however, it has determined that its operations do not impact these heritage sites. The Entity has demonstrated that the local authorities have not required any special permits or additional documentation in relation to these operations.
8.6a-d Protected Areas	Conformance	The Entity has conducted IBAT studies at the corporate level to complement onsite Biodiversity risk assessments, aiming to identify Protected Areas across all the Entity's Facilities. The IBAT studies provides a global view of Biodiversity issues across all sites using the STAR data layer. According to this methodology, no site was ranked higher than "medium" risk, with most sites classified as "low" risk due to their locations. If a Facility is identified within a Protected Area, the Entity ensures it has the necessary authorisation and permits to operate. Additional information on Constellium's Policies and initiatives relating to Biodiversity is included in the 2025 Sustainability Report, pages 40-42: https://www.constellium.com/sustainability/policies-reports-and-certifications
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 Constellium Human Rights Policy is aligned to the UN Guiding Principles on Business and Human Rights: https://www.constellium.com/sustainability/policies-reports-and-certifications The Entity has been a signatory member of the UN Global Compact since 2013. The respect of Human Rights is a commitment as described in the Constellium Code of Conduct, which was communicated to all employees and contractors, and the Supplier Code Conduct, which is communicated to supply chain partners. In 2018, the Entity completed a Human Rights Due Diligence assessment, engaging with local sites and internal Stakeholders via workshops. This assessment is now being updated, and the Entity is working with third party Human Rights experts to undertake this review. The Human Rights Scoping Review was reviewed during the Audit. The Compliance Committee, chaired by the Senior Vice President, Group General Counsel, oversees the training and communication of

CRITERION	RATING	COMMENT
		the worldwide Code of Employee and Business Conduct, as well as its compliance, updating, and enforcement. This Committee provides quarterly reports to the Audit Committee that include any Material issues regarding the Sustainable Sourcing Policy, the Human Rights Policy and Labor Practices, alleged cases of Corruption or influence peddling, or alleged breaches of the General Data Protection Regulation (GDPR). The Entity discloses against GRI 412-1 'Human Rights Assessment' in the 2025 Sustainability Report, page 80: https://www.constellium.com/sustainability/policies-reports-and-certifications
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has developed and implemented Policies, systems, Procedures and processes that conform to the women's rights requirements. The Constellium Group is reporting publicly on gender diversity indicators such as the number of female/male Workers and male/female senior managers in the 2025 Sustainability Report, page 72 under GRI 405-1 'Diversity of governance bodies and employees'. Further information on the Gender Diversity Programme is included on page 71-72: https://www.constellium.com/sustainability/policies-reports-and-certifications The Entity compensates all employees equitably based on their competitive labour market data, performance levels and contributions to the Entity's success while ensuring adherence to all Applicable Laws and regulations. The Entity's corporate headquarters has established a steering committee addressing gender equity and women empowerment with senior management to oversee the gender diversity strategy implementation and progress against targets.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
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 Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage - Identification	Conformance	An inventory of World Heritage locations in the vicinity of the Entity's Facilities was performed at Corporate level. In the sites sampled for the scope of this Audit, no cultural and sacred heritage sites were identified. As per French law, Constellium submits a Vigilance Plan on an annual basis, which describes its Human Rights and Modern Slavery risk assessment and mitigation measures. The Entity did not identify

CRITERION	RATING	COMMENT
		Material impacts on cultural and sacred heritage sites at any of its locations.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no resettlements/displacement currently being considered or have occurred during the period since the Entity joined ASI, or are expected to occur during the Certification Period.
9.7a-h Affected Populations and Organisations	Conformance	The Human Rights Due Diligence assessment did not identify any negative impacts on Local Communities. This assessment was undergoing review at the time of the Audit. The Entity has disclosed its community development programs according to GRI 413-1 in the 2025 Sustainability Report, from page 45: https://www.constellium.com/sustainability/policies-reports-and-certifications The relevant interested parties, their needs and expectations and associated risks and opportunities are documented using the EHS Business Context Worksheet.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented a Responsible Supply Chain Management Policy and Supplier Code of Conduct that is aligned with the United Nations Global Compact. The Entity expects all contracted suppliers to sign the Supplier Code of Conduct and to respect and adhere to its terms in regard to the environment, society, business ethics, Human Rights, and labour practices. The Entity expanded their Integrity Hotline during 2022 and updated their Supplier Code of Conduct to include the hotline and explaining how important it is for suppliers to raise any red flags concerning procurement activities.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity conducted a supplier risk mapping exercise during 2023, which described its methodology and approach (Scope, Risk Dimensions and Quantification). It has identified the country of origin, legal entity names of its purchased ingots suppliers and conducted a Conflict-Affected and High-Risk Areas (CAHRA) assessment. The Entity's ingot suppliers were either ASI Certified Entities or listed as London Metal Exchange (LME) approved brands. The Entity requires its primary and at-risk suppliers to undergo an EcoVadis assessment every three years, addressing Human Rights, environment, Health and Safety, and ethics. For Aluminium suppliers, the Entity considers ASI Certification as the assurance for the responsible production, sourcing and stewardship of Aluminium. Further information is provided in the 2025 Sustainability Report, from page 55: https://www.constellium.com/sustainability/policies-reports-and-certifications
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity implements a structured risk-based Due Diligence process for Aluminium sourced from Conflict-Affected and High-Risk Areas (CAHRA). The process includes smelter identification and tracking, country and regional risk assessments, enhanced Due Diligence for

CRITERION	RATING	COMMENT
		higher-risk suppliers, and ongoing monitoring through internal controls and independent risk intelligence tools. Risk mitigation measures are integrated into supplier management and sourcing decisions, supporting continuous assessment and management of potential Human Rights and conflict-related risks throughout the Aluminium supply chain.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The ASI Audit is an independent third-party assessment of the Entity's Due Diligence practices, and as such satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity reports annually on supplier Due Diligence including a specific paragraph about Conflict-Affected and High-Risk Areas (CAHRA), from page 54 of their Sustainability Report 2025: https://www.constellium.com/sustainability/policies-reports-and-certifications
9.9 Security practice	Conformance	The Entity's sites do not employ armed security forces. During the Entity's Human Rights risk assessment, no specific risks related to security practices were identified. Worker interviews confirmed that there were no known Human Rights violations caused by the security service. The Entity utilises a third party for security services at each location. The security providers are trained in and must adhere to Constellium's Supplier Code of Conduct.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity's Human Rights Policy and Labor Practices includes the right to Freedom of Association, as disclosed against GRI 407-1 in the 2025 Sustainability Report, pages 80 and 83: https://www.constellium.com/sustainability/policies-reports-and-certifications
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 the regions where the Entity operates (Europe and North America).
10.2a-c Child Labour	Conformance	The Entity neither uses nor supports the use of Child Labour and does not engage in, or support, Hazardous Child Labour. Workers aged between 16 and 18 are employed for vocational education purposes only, and are limited to apprenticeship programs in France, Germany and Switzerland, and supervised by senior operators at all times. The Constellium Employee Code of Conduct and Constellium Human Rights Policy & Labor Practices document the Entity's expectations. Both documents are available at: https://www.constellium.com/sustainability/policies-reports-and-certifications
10.3a-c Forced Labour	Conformance	The Entity has implemented the Constellium Human Rights Policy and Labor Practices and a Supplier Code of Conduct that strictly prohibits Forced Labour. There is no requirement in any labour agreement,

CRITERION	RATING	COMMENT
		employee handbook or agreement with a recruiting firm that requires employees to pay any type of fee in advance. The Entity does not require Workers to lodge deposits or security payments at any time. This was verified through interviews and document review during the Audit. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace, as confirmed by interviews and document review. The Entity does not provide on-site housing. Constellium has published a Modern Slavery Statement, which is available at: https://www.constellium.com/sustainability/policies-reports-and-certifications Employees, contractors and other external Stakeholders are able to report any suspicions of modern slavery in operations or supply chains via the confidential third party Integrity Hotline or Ombudsman to be investigated promptly. The Compliance Committee, chaired by the Senior Vice President and Group General Counsel, oversees training and communication of the Code of Employee and Business Conduct, as well as its compliance, updating, and enforcement. This Committee reviews cases received via the Integrity Hotline or other channels.
10.4a-c Non-Discrimination	Conformance	The Human Rights Policy and Labor Practices sets out the expectations for non-Discrimination, and the commitment to anti-Discrimination is entailed within Entity's Code of Conduct: https://www.constellium.com/sustainability/policies-reports-and-certifications As a signatory of the United Nations Global Compact (UNGC), the Entity requires its suppliers to also commit to anti-Discrimination as described in its Supplier Code of Conduct, available at the above website. The Entity does not tolerate gender-based pay Discrimination. The Entity also monitors merit and equity among its employees on a regular basis to ensure fairness of compensation. Constellium reports on non-Discrimination as per GRI 406 in its Sustainability Report: https://www.constellium.com/sustainability/policies-reports-and-certifications
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review undertaken during the Audit, the Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment. The Entity's process for grievances is outlined in each of the Collective Bargaining Agreements and in the Human Resources Manual. This process is followed to address any employee complaints. An Integrity Hotline is available that allows for the reporting of a concern or complaint that is then investigated following a defined procedure. The Entity's internal communications efforts include bi-monthly webinars, digital magazine, and a weekly newsletter. A global employee survey is undertaken every two years to measure employee engagement. Further detail is available in the 2025 Sustainability Report, pages 49-51:

CRITERION	RATING	COMMENT
		https://www.constellium.com/sustainability/policies-reports-and-certifications
10.6a-g Violence and Harassment	Minor Non-Conformance	In accordance with the Entity's Code of Conduct, sexual Harassment or Harassment on the basis of race, ethnic origin, gender, national or social origin, religious or political belief, disability or on the basis of any personal characteristic protected by law, will not be tolerated. The Entity's anti-Harassment Policy also extends to the Entity's suppliers as per the Supplier Code of Conduct. Both documents are available at: https://www.constellium.com/sustainability/policies-reports-and-certifications Constellium publicly reports according to GRI 2-16 'Communication of Critical Concerns' in its Sustainability Report. The Entity's Integrity Hotline is an independent service that provides a means for employees and suppliers to anonymously and confidentially report violations of the Code of Conduct as well as other unethical, illegal or irresponsible dealings via phone or web-form. The Hotline is available in all local languages. All concerns are documented by the external hotline operator and shared with the assigned case manager in the respective country for investigation and resolution. At the Ravenswood site, the previously identified issue, that there is no evidence that Violence and Harassment hazards were taking into account in the OH&S Management System and that risks have been identified and assessed, is still not fully addressed and an update of the Risk Assessment to integrate Violence and Harassment was not completed with the participation of Workers and their representatives.
10.7a-c Remuneration	Conformance	Working time, payment and leave are negotiated in Collective Bargaining Agreements. The wages are paid in accordance with, or above the industry standard. The Entity conducted a living wage benchmarking assessment in 2023 to assess its global operations. The Entity's wage payments are timely, in legal tender and fully documented, as have been verified by document review and interviews during the Audits. Overtime is entirely voluntary. Overtime work is paid at a premium of more than 25%. Overtime is managed locally, within the relevant legal or collective agreement framework and in line with business requirements. Specific work schedules, Overtime allocations and other time off are negotiated at the local level with representatives of the Works Councils or Trade Unions.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreements and part of each employment contract. A clock-in system is in place at each Facility. A sample of employee records, payroll information and Working Time data was reviewed during site-level visits and assessments. The Entity reports according to GRI 401 'Employment'; in the 2025 Sustainability Report, page 70: https://www.constellium.com/sustainability/policies-reports-and-certifications
10.9a-b Informing Workers of Rights	Conformance	The Entity has implemented a Human Rights Policy and Labor Practices and a Code of Conduct, which requires operating companies to inform Workers of their rights, available at: https://res.cloudinary.com/constellium/image/upload/v1665599354/PDF documents/Policies and Certifications/Policies/Human Rights and

CRITERION	RATING	COMMENT
		Labor Pratices/external_-_human_rights_policy_and_labor_practices_final_0_hkrjxq.pdf and https://www.constellium.com/sustainability/policies-reports-and-certifications Employees are trained on Human Rights during Code of Conduct training. Through this training, and as confirmed during Worker interviews, Workers are informed of their rights, including the whistleblower policy, grievance mechanism, rights to join or not join a Labour Union or work council without fear of intimidation or reprisal. The Entity has reported on Freedom of Association and Collective Bargaining under GRI 407-1 in the 2025 Sustainability Report: https://www.constellium.com/sustainability/policies-reports-and-certifications
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	Most the Entity's locations hold an ISO 45001 certification from an accredited certification body, refer to: https://www.constellium.com/sustainability/policies-reports-and-certifications The Entity maintains an EHS Policy which is also available via the above link. Constellium publicly discloses and monitors the percentage of the workforce covered by an Occupational Health and Safety (OH&S) Management System which is independently assured in their Sustainability Report.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity discloses details on its OH&S Management System as per GRI 403 guidance. The majority of the Entity's sites are ISO 45001 certified. The Entity has established indicators to monitor Health and Safety performance, including the Employee Recordable Case Rate (11.91 per million hours worked for both employees and contractors in 2025, 2.07 per million hours worked for employees, and 0.94 per million hours worked for contractors/workers who are not employees in 2025). Further information is available in the 2025 Sustainability Report, page 79: https://www.constellium.com/sustainability/policies-reports-and-certifications OH&S metrics were included in the independent assurance scope for the Sustainability Report. Constellium has disclosed comparative analyses of Health and Safety performance with peer businesses at: https://www.constellium.com/sustainability/safety-and-health
11.2 Employee engagement on Health and Safety	Conformance	All the Entity's sites have workforce representation in Health and Safety committees, in which Workers and Worker representatives are members of this committee. These committees hold quarterly meetings to discuss Material Health and Safety issues. Further information is reported to address GRI 403-4 in the 2025 Sustainability Report, from page 45: https://www.constellium.com/sustainability/policies-reports-and-certifications The Entity has established processes to assure employees can participate and provide input specific to any Health and Safety concerns. These processes are described in the EHS Manuals and are also part of the daily operational meetings. The Entity maintains an EHS Policy which is also available via the above link. Most of the Entity's sites hold ISO 45001 certification from an accredited certification body.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	28 July 2019	Initial Certification Audit – Full Certification
1	3 November 2022	Re-Certification Audit – Full Certification
2	19 June 2024	Re-Certification Audit and Scope Change – Full Certification. Scope Change to apply PS V3. Scope Change to transfer Constellium's existing ASI Certified Facilities of Neuf-Brisach (France) (Certificate 83), Dahenfeld, Gottmadingen and Singen AS&I (Germany) (Certificate 99), Děčín Extrusion plant (Czech Republic) (Certificate 284, and Bowling Green and Muscle Shoals (USA) (Certificate 290), and the supply chain activities of Aluminium Re-melting/Refining and Material Conversion. Scope Change to add Astrex (Canada), Chippis (Switzerland), C-TEC (France), Issoire (France), Levice (Slovakia), Montreuil-Juigné (France), Nuits-Saint-Georges (France), Sierre extrusion (Switzerland), Sierre Plate (Switzerland), Singen Extrusion (Germany), Steg (Switzerland), Van Buren (USA), White (USA) and Zilina (Slovakia). The 'Singen' Facility included in the Initial Certification Audit and Re-Certification Audit is now distinguished as 'Singen Rolled Products and the 'Singen AS&I' Facility redefined as 'Singen Extrusion'. The 'Děčín Extrusion plant' is redefined as 'Děčín'.
3	22 November 2026	Surveillance Audit