# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# TRIMET FRANCE

CERTIFICATE NUMBER 189 ASI STANDARD PERFORMANCE STANDARD (V2 2017)

DATE OF ISSUE
1 APRIL 2022

DATE OF EXPIRY

CERTIFICATION LEVEL FULL CERTIFICATION ASI ACCREDITED AUDITOR DEKRA CERTIFICATION

CERTIFIED SINCE
1 APRIL 2022

#### 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

Development, manufacture and sale of alloy in the form of wires, slabs and ingots, excluding upstream downstream transport; production of molten aluminium; and manufacture of anodes at the Saint-Jean-de-Maurienne and Castelsarrasin sites (France).

# SUMMARY AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	TRIMET Aluminium SE
ENTITY NAME	TRIMET France
CERTIFICATION SCOPE	Development, manufacture and sale of alloy in the form of wires, slabs and ingots, excluding upstream downstream transport; production of molten aluminium; and manufacture of anodes at the Saint-Jean-de-Maurienne and Castelsarrasin sites (France).
SUPPLY CHAIN ACTIVITIES	<ul> <li>Aluminium Smelting</li> <li>Aluminium Re-melting/Refining</li> <li>Casthouses</li> </ul>
ASI STANDARD	Performance Standard V2
AUDIT TYPE	Initial Certification Audit
AUDIT FIRM	DEKRA Certification
AUDIT DATE	6 – 10 December 2021 (On-site) and 22 December 2021 (Remote)
AUDIT REPORT SUBMISSION	8 February 2022
AUDIT SCOPE	The audit scope includes the development, manufacturing and sale of alloy in the form of wires, plates and ingots, excluding upstream downstream transport; production of molten aluminium and; manufacture of anodes at the Saint-Jean-de-Maurienne and Castelsarrasin sites (France).
	The audit of the Castelsarrasin site was undertaken remotely, consistent with a multi-site approach for an Initial Certification Audit.
	Supply chain activities included in the audit scope:
	Aluminium Smelting
	Aluminium Re-melting/Refining
	Casthouses
	All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME	Certification				
AUDIT METHODOLOGY	The Auditors confirm that:				
DECLARATION	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	1 April 2022 – 31 March 2025				
NEXT AUDIT TYPE	Re-Certification Audit				
NEXT AUDIT DUE DATE	31 March 2025				
CERTIFICATE NUMBER	189				

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT	
PRINCIPLE 1 BUSINESS INTEGRITY			
1.1 Legal Compliance	Conformance	The Entity implements a regulatory review as part of a procedure of the Integrated Management System and legal compliance is reviewed by external legal firms.	
1.2 Anti-Corruption	Conformance	Relevant employees are provided with training in Anti- Corruption. The Entity has established an internal whistleblower procedure which identifies the means of gathering any facts.	
1.3 Code of Conduct	Conformance	The Entity has adopted the Code of Conduct established by BME (Bundesverband Materialwirtschalft Einkaufund logistics e V.). The Code commits the Entity to supporting actions in favour of the environment on the part of employees and also includes the support of social and governance performance.	
PRINCIPLE 2 POLICY & MANAGE	MENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's Managerial Policy explicitly covers Corporate Social Responsibility (CSR). The Entity is certified to ISO 9001, ISO 14001, ISO 45001 and ISO 50001.	
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity is certified according to ISO 9001, ISO 14001, ISO 45001 and ISO 50001 which attest to senior management's commitment. Management reviews of the Corporate Social Responsibility (CSR) Policy are conducted annually.	
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity is certified according to ISO 9001, ISO 14001, ISO 45001 and ISO 50001 and has implemented an Integrated Management System, and has implemented internal and external communication to make its Corporate Social Responsibility (CSR) Policy known to stakeholders.	
2.2 Leadership	Conformance	The Entity has a document formalising the appointment of a management representative.	
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented an ISO 14001 certified Management System.	
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity's Management System is certified according to ISO 45001 and includes employee participation in risk assessment. The Entity's	

CRITERION	RATING	COMMENT
		Corporate Social Responsibility (CSR) approach is outlined in the annual Sustainability Report.
2.4 Responsible Sourcing	Conformance	The Entity has developed and implemented a Code of Conduct for its suppliers and communicates all Corporate Social Responsibility (CSR) aspects to suppliers in the form of requirements.
2.5 Impact Assessments	Conformance	The Entity's projects are systematically implemented using a V-cycle methodology and upstream stages are undertaken in partnership with staff representatives. Impact Assessments are undertaken by the Entity as required by French law.
2.6 Emergency Response Plan	Conformance	An Emergency Response Plan is legally required as the Entity has a high-threshold Seveso classification. The Entity has a POI (internal operations plan), last updated in November 2021 which identifies the scenarios. The fire department collaborates on the emergency exercises and the subsequent report is provided to the Workers' representatives.
2.7 Mergers and Acquisitions	Conformance	Mergers and acquisitions are managed by the Entity's parent company TRIMET Aluminum SE.
2.8 Closure, Decommissioning and Divestment	Conformance	French regulations by the French administration (DREAL) require the Entity to consider environmental, societal and governance issues in the event of a closure. Closure and decommissioning requirements are the responsibility of the Entity's Supervisory Committee.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The TRIMET Sustainability Report is prepared in accordance with the Global Reporting Initiative (GRI) guidelines and includes a GRI index and addresses the 17 UN Sustainable Development Goals: <u>https://www.trimet.eu/fr/telechargements/rapports-sur-</u> <u>le-developpement-durable</u> The Entity has prepared a 2020 Sustainability Report, available for download on the website: <u>https://www.trimet.eu/fileadmin/downloads/en/Sustain</u> <u>ability_reports/TRIMET_RAPPORT_FR_11122021.pdf</u> (English version)
3.2 Non-compliance and liabilities	Conformance	The Entity discloses information on non-compliance and liabilities associated with Applicable Law in the Sustainability Report. There were no incidents reported in the 2020 Sustainability Report.

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	The Entity's Anti-Corruption policy and processes are established and the Entity does not make payments to government.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	Stakeholders can make complaints and requests for information of the Entity via telephone contact with the relevant persons. The Entity registers and handles all requests from interested parties.
PRINCIPLE 4 MATERIAL STEWA	RDSHIP	
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has two Environmental Product Declaration's (EDP's) for electrical wire rod, prepared in response to a customer request. The Entity's Sales Department transmits information on the publication upon customer request.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has two Environmental Product Declaration's (EDP's), which are compliant with EN 15804 and are available upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has two Environmental Product Declaration's (EDP's), which include information on the potential environmental impacts during the life cycle. The Entity provides information on the publication upon customer request.
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity recycles 100% of the Aluminium waste and maintains several indicators and figures to ensure an accurate tracking of recycling targets.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has dedicated areas where different waste types are separated. The instructions for remelting are delivered via the Entity's Information Center to determine the quantities that can be used to produce Aluminium.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has a partnership with two customers and a recycling facility to maintain a rate of recycled Aluminium of external origin, which it monitors and supervises. A significant investment in a chip compactor at the Saint-Jean-de-Maurienne site supports its strategic objectives.

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is committed with several partners to increase the recycling rate and uses indicators to monitor its impact.
PRINCIPLE 5 GREENHOUSE GAS	SEMISSIONS	
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has prepared a public Sustainability Report which includes data on energy and GHG emissions, refer pages 34 and 40: <u>https://www.trimet.eu/fileadmin/downloads/en/Sustain</u> <u>ability_reports/TRIMET_RAPPORT_FR_11122021.pdf</u> (English version)
5.2 GHG emissions reductions	Conformance	The Entity has a decarbonization roadmap which establishes the objective for 2025 of a reduction of Scope 1 and Scope 2 GHG emissions. Regarding indirect emissions, the supply of electrical energy to the sites includes more than 90% carbon-free electricity. Information is disclosed on the website: https://www.trimet.eu/fr/ueber_trimet/nachhaltigkeit/um welt-und-klimaschutz
5.3a Aluminium Smelting (management system)	Conformance	The Entity published an annual Sustainability Report which demonstrates the reduction of GHG emissions.
5.3b Aluminium Smelting (up to and including 2020)	Conformance	The annual Sustainability Report discloses that the Scope 1 and Scope 2 GHG emissions are well below the 8 tonnes CO <sub>2</sub> -eq per metric tonne Aluminium. The Management System establishes objectives and indicators to monitor continuous improvement.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable as Aluminium smelting activities commenced prior to 2020.
PRINCIPLE 6 EMISSIONS, EFFL	UENTS AND WA	A STE
6.1 Emissions to Air	Conformance	The Entity declares its air emissions to the French environmental administration annually. The Entity's Management System is certified according to ISO 14001 with an action plan to address air emissions. The Sustainability Report discloses data on air emissions.
6.2 Discharges to Water	Conformance	The Entity's Management System is certified according to ISO 14001 and Discharges to Water are strictly controlled according to the Entity's permit to operate. The Sustainability Report contains information on the environmental impacts. The French administration (DREAL) regularly monitors the Entity.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity's Management System is certified according to ISO 14001 which includes the

CRITERION	RATING	COMMENT
		management of environmental risks including Spills and Leakage.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity's Management System is certified according to ISO 14001. The Entity manages an internal and external communication process with stakeholders and manages Spills through corrective actions to prevent their occurrence.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity holds an operating license and reports Spills to all the related regulatory declarations which quantify the impacts.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity publicly discloses the environmental impact of Spills to the local French environmental administration and in the 2020 Sustainability Report, available for download at the website: <u>https://www.trimet.eu/fileadmin/downloads/en/Sustain</u> <u>ability_reports/TRIMET_RAPPORT_FR_11122021.pdf</u> (English version)
6.5a Waste management and reporting (strategy)	Conformance	The Entity has an environmental action plan which includes waste management and waste reduction. Actions are implemented in accordance with the Entity's Corporate Social Responsibility (CSR) Policy.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity publicly discloses waste management and disposal, including quantities of Hazardous and Non- Hazardous Waste in the annual Sustainability Report, available for download at the website: <u>https://www.trimet.eu/fileadmin/downloads/en/Sustain</u> <u>ability_reports/TRIMET_RAPPORT_FR_11122021.pdf</u> (English version) The 2021-2022 waste management plan is documented and is consistent with the disclosure on the website.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT	
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.	
6.7a Spent Pot Lining (SPL) (storage and management)	Conformance	The Entity manages Spent Pot Lining (SPL) and Dross to prevent their release into the environment. A third-party advises the Entity to optimize its management.	
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity has commissioned an external consultant to report on Spent Pot Lining (SPL) optimization which has resulted in the preparation of an environmental action plan. There is no SPL discharged into marine and aquatic environments and internal operations plans are implemented for centennial flood situations.	
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	Spent Pot Lining (SPL) is managed and stored so as not to impact the environment before being disposed of as waste. Landfilling of SPL occurs when necessary following stabilisation.	
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity commissioned an external consultant to report on alternatives to landfilling and stockpiling Spent Pot Lining and an internal process to evaluate alternatives was undertaken in 2021.	
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	There is no Spent Pot Lining (SPL) discharged into marine and aquatic environments and a centennial flood situation is prevented by an internal operations plan.	
6.8a Dross (recovery)	Conformance	The Entity has an internal procedure and a contract with an external metal refiner to maximise the recovery of Dross and Dross residues.	
6.8b Dross (recycling)	Conformance	The Entity has a contract with a metal refiner and recycles 100% of Dross.	
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable as Dross volumes are all valorised.	
PRINCIPLE 7 WATER STEWARDSHIP			

7.1a Water assessment (mapping)	Conformance	The Entity has updated the mapping of water withdrawals as part of its leak remediation work and is implementing an automated process for the measurement of incoming flows. The Entity communicates water management with stakeholders.
7.1b Water assessment (risk assessment)	Conformance	The Entity has analysed the risks associated with the supply of cooling water within its Area of Influence and action plans are in place to prevent impact.

CRITERION	RATING	COMMENT
7.2a Water management (management plans)	Conformance	As part of the 2021-2022 environmental action plan, two actions are planned to mitigate risks identified for the water supply. The progress on implementation is regularly reviewed within the framework of the ISO 14001 certified Environmental Management System.
7.2b Water management (monitoring)	Conformance	The ISO 14001 certified Environmental Management System includes evaluation of the effectiveness of water management action plans.
7.3 Disclosure of water usage and risks	Conformance	The Entity responds to all mandatory declarations resulting from the national water agency. The Entity publicly discloses its consumption and significant risks in its Sustainability Report, available on the website: <u>https://www.trimet.eu/fileadmin/downloads/en/Sustain ability_reports/TRIMET_RAPPORT_FR_11122021.pdf</u> (English version)
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A Biodiversity assessment was conducted in 2021 and a subsequent Biodiversity Action Plan is being implemented. An agricultural expert studies the impact of fluorinated emissions on surrounding vegetation annually and monitoring results demonstrate a reduction in impact.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity's 2021 – 2025 Biodiversity Action Plan specifies eight actions which are being implemented.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Mitigation Hierarchy is respected for each of the actions included in the Biodiversity Action Plan. The Plan is available for consultation within the Entity.
8.2c Biodiversity management (reporting)	Conformance	The Entity reports on Biodiversity outcomes in the 2020 Sustainability Report, refer pages 43 - 45: https://www.trimet.eu/fileadmin/downloads/en/Sustain ability_reports/TRIMET_RAPPORT_FR_11122021.pdf (English version)
8.3 Alien Species	Conformance	The Entity's Biodiversity Action Plans includes actions to avoid the introduction of Alien Species that could harm Biodiversity.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has developed a Charter of Human Rights and Working Conditions which is provided to new employees and subcontractors.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity conforms to European and French law on the protection of the Human Rights for employees and subcontractors. The commitment is communicated via the Charter of Human Rights and Working Conditions.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has appointed a person responsible for verifying that the Entity meets all of its commitments in terms of Human Rights and compliance with the company Charter, which is communicated to stakeholders. The responsible person consults with management and leads any required remediation.
9.2 Women's Rights	Conformance	The Entity respects the French law on gender equality and organizes consultation on these subjects with the unions in several meetings throughout the year.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no cultural and sacred heritage sites or values as part of the Entity's Area
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as there is no Resettlement necessary as there are no Indigenous Peoples within the Entity's Area of Influence.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as there is no Resettlement necessary as there are no Indigenous Peoples within the Entity's Area of Influence.
9.7a Local Communities (rights and interests)	Conformance	The Entity has no plans to expand the footprint of its sites. The Entity supports associations and local organisations with financial assistance.

CRITERION	RATING	COMMENT
9.7b Local Communities (impacts)	Conformance	The Entity supports associations and local organisations with financial assistance.
9.7c Local Communities (livelihoods)	Conformance	The Entity offers financial assistance to sports clubs and local humanitarian associations.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has a procedure to avoid contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity has a security provider that respects its Corporate Social Responsibility (CSR) Policy.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the French law requiring it to adhere to a Collective Agreement.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the French law requiring it to adhere to a Collective Agreement.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as French law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity complies with French law which prohibits Child Labour and the Entity makes responsible purchases using its Code of Conduct established by BME (Bundesverband Materialwirtschalft Einkaufund logistics e V.).
10.2b Child Labour (hazardous)	Conformance	The Entity complies with French law which prohibits Child Labour. The Entity respects Collective Agreements and makes responsible purchases using its Code of Conduct established by BME (Bundesverband Materialwirtschalft Einkaufund logistics e V.).
10.2c Child Labour (worst forms)	Conformance	The Entity respects Collective Agreements and French law that protects against Child Labour and does so through a Code of Conduct established by BME (Bundesverband Materialwirtschalft Einkaufund logistics e V.).
10.3a Forced Labour (human trafficking)	Conformance	The Entity has a Corporate Social Responsibility (CSR) Policy, respects French law and does not engage in nor support the use of Forced Labour.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has a Corporate Social Responsibility (CSR) Policy, respects French law and does not

CRITERION	RATING	COMMENT
		engage in nor support the use of Forced Labour. Deposits, fees or security payments are not required.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has a Corporate Social Responsibility (CSR) Policy, respects French law and does not engage in nor support the use of Forced Labour. Deposits, fees or security payments are not required.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has a Corporate Social Responsibility (CSR) Policy, respects French law and does not engage in nor support the use of Forced Labour. Deposits, fees or security payments are not required.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has a Corporate Social Responsibility (CSR) Policy, respects French law and does not engage in nor support the use of Forced Labour.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in Forced Labour and only stores copies of the original documents necessary to comply with French labour laws.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity respects the Collective Agreement and French labour law for announcing termination of the working contract.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination and communicates this commitment in its Human Rights Code of Conduct. The Entity expects the same from its suppliers in its Supplier Code of Conduct. The French law which requires public disclosure on the gender equality index is respected.
10.5 Communication and engagement	Conformance	The Entity uses mandatory Social Commissions provided for under the Labour Code to ensure employees participate and representation regarding their working conditions.
10.6 Disciplinary practices	Conformance	The Entity respects its employees and disciplinary measures are regulated by law and outlined in an internal document provided to all new employees.
10.7a Remuneration (living wage)	Conformance	The Entity has established Collective Agreements and wages are in accordance with the Agreement.
10.7b Remuneration (method of payment)	Conformance	All wage payments are documented and submitted on the 30 <sup>th</sup> of the current month to the Workers bank accounts.
10.8 Working Time	Conformance	Working hours are recorded electronically and paid monthly. Management of the Working Time respects the French law.

CRITERION	RATING	COMMENT
PRINCIPLE 11 OCCUPATIONAL	HEALTH AND S	AFETY
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity's Corporate Social Responsibility (CSR) Policy is widely communicated to all stakeholders. The Management System is certified according to ISO 45001 which demonstrates that an Occupational Health and Safety Policy is well implemented and communicated.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Corporate Social Responsibility (CSR) Policy is widely communicated to all stakeholders. Workers and subcontractors are informed of the health and safety risks and the required preventive measures.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Occupational Health and Safety Policy complies with international standards and applicable ILO Conventions. The Sustainability Report discloses the results of performance against health and safety Key Performance Indicators (KPI's).
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Workers' representatives meet with management annually to review the mandatory documents on health and safety risks. Workers are aware of their right to stop unsafe work and the safety video at the site's reception areas further inform of the right to refuse dangerous work.
11.2 OH&S Management System	Conformance	The Entity's Management System is certified according to ISO 45001 and the December 2020 audit found no non-conformities.
11.3 Employee engagement on health and safety	Conformance	The Entity's Management System is certified according to ISO 45001 and consults with Workers on Occupational Health and Safety (OH&S) matters. The Entity implements a Social and Economic Commission (CSE), as required by French law, where management and Workers representatives meet on OH&S at least four times per year. The Entity has an intranet-based tool to allow Workers and external companies to report on OH&S issues.
11.4 OH&S performance	Conformance	The Entity has established a roadmap on the safety of people and processes. A Steering Group, including a member of the Safety, Health and Working Conditions Commission and management meets fortnightly. Key Performance Indicators (KPI's) are a mix of lagging and leading indicators.

### **Document Control and Version History**

Revision	Date	Notes
0	1 April 2022	Initial Certification Audit - Full Certification