
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NOVELIS NORTH AMERICA – BEREA, KY

CERTIFICATE
NUMBER

212

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

30 JUNE 2022

DATE OF EXPIRY

29 JUNE 2025

CERTIFIED SINCE

30 JUNE 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall'.

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

Beverage Cans (including recycling) at Novelis Berea, KY (USA): Produces aluminum ingots; material ultimately used by beverage can makers for can body and can ends.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis NNA – Berea, KY
CERTIFICATION SCOPE	Beverage Cans (including recycling) at Novelis Berea, KY (USA): Produces aluminum ingots; material ultimately used by beverage can makers for can body and can ends.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">18 – 22 April 2022
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">6 June 2022
AUDIT SCOPE	<p>The audit scope covers Novelis in Berea, KY (USA).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.

-
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
-

CERTIFICATION PERIOD 30 June 2022 – 29 June 2025

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 29 December 2023

CERTIFICATE NUMBER 212

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	The Entity has implemented an adequate system to monitor and comply with applicable legal requirements through the use of procedures and worksheets to demonstrate compliance. However, it was not evidenced that the labour legislation and ILO conventions are mapped and properly monitored.
1.2 Anti-Corruption	Conformance	The Entity acts against Corruption in all its forms, including Extortion and Bribery, in accordance with Applicable Law and current international standards. For more information, refer to the Code of Conduct on pages 5 and 6: https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf and the Ethics Line: Vox Novelis: https://www.novelis.com/suppliers/ethics-line-vox-novelis
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct, including principles relevant to environmental, social and governance performance: https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented Policies consistent with environmental, social and governance practices: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented a document control system which senior management endorse and support through the availability of resources and periodic review of the Policies. The Environment, Health, Safety and Quality Policy is available at: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has publicly disclosed Policies consistent with environmental, social and governance practices internally on policy boards and the website:

CRITERION	RATING	COMMENT
		https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
2.2 Leadership	Conformance	The Entity has appointed the Vice President (VP) of Operations Novelis North America as the Management Representative with overall responsibility and authority to ensure compliance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has been certified in accordance with ISO 14001: https://www.novelis.com/wp-content/uploads/2022/05/Berea-ISO-14001-Certificate.pdf
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has defined and documented the Social Management System in the Social Responsibility Policy. The Entity first signed its commitment to the UN Compact in 2011. For more information access the link: https://www.novelis.com/about-us/people
2.4 Responsible Sourcing	Minor Non-Conformance	The Entity has implemented a Responsible Purchasing Policy and a Supplier Code of Conduct for suppliers covering environmental, social and governance issues. For further information refer to the links: https://www.novelis.com/suppliers https://www.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-ENG-04292021.pdf However, it was not evidenced that the contracted suppliers have signed the commitment to comply with the Supplier Code of Conduct.
2.5 Impact Assessments	Conformance	The Entity has documented an environmental assessment process, which takes into account environmental, social, cultural, Human Rights and a gender analysis, for New Projects.
2.6 Emergency Response Plan	Conformance	The Entity has implemented site-specific Emergency Response Plans developed in collaboration with potentially affected stakeholder groups such as Communities, Workers and their representatives and relevant agencies through the Standard Emergency Action Plan.
2.7 Mergers and Acquisitions	Conformance	The Entity has documented an environmental assessment process, which takes into account

CRITERION	RATING	COMMENT
		environmental, social, cultural, human rights and a gender analysis, for New Projects including mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has documented an environmental assessment process which includes processes for closure, deactivation and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has made its approach to governance, environmental, social and economic impacts publicly available in the Sustainability Report: https://www.novelis.com/wp-content/uploads/2021/03/Novelis-Sustainability-Platform.pdf
3.2 Non-compliance and liabilities	Conformance	Information on fines, sentences, penalties and sanctions are publicly disclosed on the US Environmental Protection Authority's (EPA) website for Enforcement and Compliance History Online (ECHO): https://echo.epa.gov/facilities/facility-search/results
3.3a Payments to governments (legal and contractual)	Conformance	Payments to governments made on behalf of the Entity include operational taxes and fees only. The Entity has a procedure, in accordance with the Anti-Corruption Policy, for analysing, approving and making payments to governments.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and gender and culturally sensitive grievance mechanisms suitable for dealing with complaints, grievances and requests for information from stakeholders: https://www.novelis.com/suppliers/ethics-line-vox-novelis
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has assessed the life cycle impacts of its main product lines for which Aluminium is used through the 'Life Cycle Assessment of North American Aluminum Cans' report, prepared for The Aluminum Association, which is relevant to the Entity's products: https://www.aluminum.org/sites/default/files/2021-10/2021AluminumCanLCARreportFullVersion.pdf

CRITERION	RATING	COMMENT
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has assessed the life cycle impacts of its main product lines for which Aluminium is used through the 'Life Cycle Assessment of North American Aluminum Cans' report, prepared for The Aluminum Association, which is relevant to the Entity's products. Upon customer request, the Entity provides line-specific or product-specific information demonstrating the cradle-to-gate analysis Life Cycle Assessment (LCA).
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity publicly discloses the Life Cycle Assessment prepared for The Aluminum Association, 'Life Cycle Assessment of North American Aluminum Cans', which is relevant to the Entity's products: https://www.aluminum.org/sites/default/files/2021-10/2021AluminumCanLCAReportFullVersion.pdf
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 minimizes the generation of Aluminium Process Scrap in its own operations and recycles (remelts) all scrap generated.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity minimizes the generation of Aluminium Process Scrap in its own operations and recycles (remelts) all scrap generated.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	As a supplier member of the national trade association, the Can Manufacturers Institute (CMI), the Entity works in collaboration with member companies to advance recycling legislation and fund new recycling programs. The CMI and The Aluminum Association announced ambitious aluminium beverage can recycling rate targets of 70% by 2030, 80% by 2040 and 90% by 2050.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is engaged with collection and recycling systems and supports and participates in regional projects to increase recycling, such as partnerships with the Atlanta's State Farm Arena and Mercedes-Benz Stadium, involvement with Habitat for Humanity's 'Recycle for Good' program and membership in The Recycling Partnership's 'Circular Economy Accelerator' initiative.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts for and publicly discloses material GHG emissions and energy use by source

CRITERION	RATING	COMMENT
		<p>annually on the CDP Climate Change platform and on US Environmental Protection Agency's platform: https://echo.epa.gov/detailed-facility-report?fid=110000379135 https://pt-br.novelis.com/wp-content/uploads/2021/03/Novelis-Sustainability-Platform.pdf</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity accounts for and publicly discloses material GHG emissions and energy use on the website on the 'Our Ambition' page and in the Sustainability Report on pages 7-9. The Entity has committed to a 10% energy reduction and a 30% reduction in carbon footprint by 2026. For further information please refer to the links: https://pt-br.novelis.com/sustainability-commitments https://pt-br.novelis.com/wp-content/uploads/2021/03/Novelis-Sustainability-Platform.pdf</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>The Entity quantifies and reports emissions to the atmosphere that have adverse effects on humans or the environment, being available through the Freedom of Information Act (FOIA). The Entity has defined the plans to minimize the adverse impact on the environment in the Operation, Maintenance and Monitoring Plan. The Novelis Environmental Metrics Reporting and Management Directive includes all emissions and acceptable limits and the form of emissions management and periodicity of data analysis.</p>
6.2 Discharges to Water	Conformance	<p>The Entity has carried out an assessment of the main risk areas of operations where Spills and Leakages can contaminate the air, water and/or soil. Discharged water is treated by the Effluent Treatment System and meets the pre-defined parameters.</p>

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has carried out an assessment of the main risk areas of operations where Spills and Leakages can contaminate the air, water and/or soil through the Spill Prevention, Control and Response Performance Standard procedure.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented a management plan and external communication, compliance controls and monitoring program to prevent and detect the Spills and Leakages through the Spill Prevention, Control and Response Performance Standard procedure. During the last three years, there have been no significant Spills identified.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented a management plan and external communication, compliance controls and monitoring program to prevent and detect the spills and leaks through the Spill Prevention, Control and Response Performance Standard procedure. There have been no significant Spills identified.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented a management plan and external communication, compliance controls and monitoring program to prevent and detect these spills and leaks through the Spill Prevention, Control and Response Performance Standard procedure. There have been no significant Spills identified and therefore no requirement for external communication.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy through the Waste Management Program procedure.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy through the Waste Management Program procedure. However, it was not evidenced that the Entity publicly disclosed the quantity of Hazardous and Non-Hazardous Waste generated.
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.

CRITERION	RATING	COMMENT
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 (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity maximizes the recovery of Aluminium through the treatment of Dross by contracted companies.
6.8b Dross (recycling)	Conformance	The Entity segregates Dross to improve Aluminium recovery and minimizes the generation of Dross residues by contracted companies.
6.8c Dross (review of alternatives)	Conformance	The Entity has evaluated options as an alternative to landfill for slag residues in the 'Third Party Dross Processing' study.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped water use by source and type which includes water withdrawal, consumption and discharge.
7.1b Water assessment (risk assessment)	Conformance	The Entity has evaluated the risks related to water in watersheds in the Entity's Area of Influence via the Berea Watershed Assessment. Data for the risk assessment was extracted from the following website: https://www.wri.org/aqueduct Water-related risks are low.
7.2a Water management (management plans)	Conformance	The Entity has evaluated the risks related to water in watersheds in the Entity's Area of Influence via the

CRITERION	RATING	COMMENT
		Berea Watershed Assessment. Water-related risks are low. However, the Entity monitors water use and reports results for inclusion in Novelis' Group data in the Sustainability Report.
7.2b Water management (monitoring)	Conformance	The Entity has evaluated the risks related to water in watersheds in the Entity's Area of Influence via the Berea Watershed Assessment. Water-related risks are low. However, the Entity evaluates the effectiveness of the corporate action plan for the use of water every two years in the Sustainability Report. For further information refer to the link on pages 4 and 8: https://www.novelis.com/wp-content/uploads/2021/03/Novelis-Sustainability-Platform.pdf
7.3 Disclosure of water usage and risks	Conformance	The Entity has evaluated the risks related to water in Watersheds in the Entity's Area of Influence via the Berea Watershed Assessment report and from the Novelis CDP Water Security Questionnaire 2021. For further information refer to the link, on pages 4 and 8: https://www.novelis.com/wp-content/uploads/2021/03/Novelis-Sustainability-Platform.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risks related to the materiality of impacts on Biodiversity from land use and activities in the Entity's Area of Influence via the Ecological Footprint Report.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has assessed the risks related to the materiality of impacts on Biodiversity from land use and activities in the Entity's Area of Influence via the Ecological Footprint Report. The Entity evaluated the risks of local activities on Biodiversity and developed appropriate and preventive action plans.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has assessed the risks related to the materiality of impacts on Biodiversity from land use and activities in the Entity's Area of Influence via the Ecological Footprint Report, which indicated no impact on Biodiversity requiring remediation. Action plans have been developed.
8.2c Biodiversity management (reporting)	Conformance	The Entity has assessed the risks related to the materiality of impacts on Biodiversity from land use and activities in the Entity's Area of Influence via the Ecological Footprint Report.

CRITERION	RATING	COMMENT
		There were no impacts on Biodiversity identified that required remediation. The action plan has been developed and the Entity will disclose the outcomes in the upcoming Sustainability Report.
8.3 Alien Species	Conformance	The Entity assessed the risks related to the materiality of impacts on biodiversity from land use and activities in the Entity's Area of Influence through the Ecological Footprint, the report provides a summary of the site's regional ecology. Evidenced that during the assessment, no impacts on Biodiversity that need remediation were identified, the action plan developed demonstrates that the Entity establishes positive impact actions for improvement, conservation and prevention of accidental or deliberate introduction of alien species that may have significant adverse impacts on biodiversity. The Entity will make the public disclosure in the next edition of the Sustainability report.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has developed a commitment to Human Rights, first adhered to the UN Global Compact in 2011 and discloses the Novelis Code of Conduct to all Workers and suppliers: https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has developed the Environmental and Social Due Diligence process to identify, prevent, mitigate and account for how it addresses actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has developed the Environmental and Social Due Diligence process to identify, prevent,

CRITERION	RATING	COMMENT
		mitigate and account for how it addresses actual and potential impacts on Human Rights. The Entity does not identify as having caused or contributed to adverse impacts on Human Rights.
9.2 Women's Rights	Conformance	The Entity has implemented a Working Committee to ensure respect for the rights and interests of women, in accordance with international standards, including the United Nations Convention on the Elimination of All Forms of Discrimination Against Women, establishing commitments including the #breakTheBias campaign, parental leave policy and online advertising campaigns. For further information refer to the link: https://www.youtube.com/watch?v=erylpgRTVks
9.3 Indigenous Peoples	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure respect for the rights and interests of Indigenous Peoples, in accordance with international standards, including ILO Convention 169 and the United Nations Declaration on the Rights of Indigenous Peoples, after mapping the indigenous communities.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy to ensure consultation and cooperation with Indigenous Peoples when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated with and living on relevant lands.
9.5 Cultural and sacred heritage	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, relevant when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated with and living on relevant lands. The policy ensures the Entity, in consultation with affected Communities, cooperates to identify cultural or sacred heritage sites and values within the Area of Influence and takes appropriate measures to avoid or remedy the impacts, as well as to guarantee continued rights of access to such sites or values.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy to ensure that viable alternatives to avoid or minimise physical and/or economic displacement are considered when New Projects or Major Changes to

CRITERION	RATING	COMMENT
		existing projects may have significant impacts on Indigenous Peoples culturally associated and living on the relevant lands.
9.6b Resettlements (where unavoidable)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy to ensure that viable alternatives to avoid or minimise physical and/or economic displacement are considered when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated and living on the relevant lands. There is no evidence of the need for displacement or Resettlement.
9.7a Local Communities (rights and interests)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and in the use of natural resources. For further information refer to the link: https://www.novelis.com/about-us/community-outreach
9.7b Local Communities (impacts)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy to prevent and address any adverse impacts on the livelihoods of the Local Community resulting from its activities. For further information refer to the link: https://www.novelis.com/about-us/community-outreach
9.7c Local Communities (livelihoods)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy to prevent and address any adverse impacts on the livelihoods of the Local Community resulting from its activities. For further information refer to the link: https://www.novelis.com/about-us/community-outreach
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented the Novelis Supplier Code of Conduct and does not contribute to armed conflicts or Human Rights abuses in Conflict-Affected and High-Risk Areas: https://www.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-ENG-04292021.pdf During the process of qualifying new suppliers, the Conflict Minerals Questionnaire is signed: https://www.novelis.com/suppliers/rfx-process

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity has a contracted and private security company that respects the Human Rights of Workers in accordance with known security standards and good practices.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (Freedom of Association)	Conformance	The Entity respects the rights of Workers to freely associate in Labour Unions, seek representation and join Workers' Councils without interference and in compliance with the National Labor Relations Act of the USA. For further information refer to the link: https://www.nlr.gov/guidance/key-reference-materials/national-labor-relations-act
10.1b Freedom of Association and Right to Collective Bargaining (Collective Bargaining)	Conformance	The Entity respects the rights of Workers to freely associate in Labour Unions, seek representation and join Workers' Councils without interference and in compliance with the National Labor Relations Act of the USA. For further information refer to the link: https://www.nlr.gov/guidance/key-reference-materials/national-labor-relations-act
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Criterion is not applicable as the Entity respects the rights of Workers to freely associate in Labour Unions, seek representation and join Workers' Councils and operates in a country that does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights. Child Labour is not used. For further information refer to the link: https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf
10.2b Child Labour (hazardous)	Conformance	The Entity has implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights. Child Labour is not used. For further information refer to the link: https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights. Child Labour is not used. For further information refer to the link:

CRITERION	RATING	COMMENT
		https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf
10.3a Forced Labour (Human trafficking)	Conformance	<p>The Entity has implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not engage in or support trafficking in persons directly or through any employment or recruitment agency. For further information refer to the link:</p> <p>https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers, directly or through employment or recruitment agencies. For further information refer to the link:</p> <p>https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not require Migrant Workers to make deposits or deposit payments at any time. For further information refer to the link:</p> <p>https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>The Entity implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not hold Workers in debt bondage or force them to work to pay off a debt. For further information refer to the link:</p> <p>https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf</p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>The Entity implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace or in housing on the premises. For further information refer to the link:</p>

CRITERION	RATING	COMMENT
		https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>The Entity implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not keep original copies of Workers' identity documents, work permits, travel documents or training certificates. For further information refer to the link:</p> <p>https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>The Entity implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not deny Workers the freedom to terminate their employment contract at any time, without penalty, upon reasonable notice. For further information refer to the link:</p> <p>https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf</p>
10.4 Non-Discrimination	Conformance	<p>The Entity has developed the Equal Employment Opportunity and Discrimination and Harassment Free Workplace Policies to ensure equal opportunities and that it does not engage in or support Discrimination in the hiring, salary, promotion, training, promotion opportunities or termination of any Worker based on gender, race, national origin. or social status, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that may give rise to Discrimination. For further information refer to the link:</p> <p>https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf</p>
10.5 Communication and engagement	Conformance	<p>The Entity has developed the Equal Employment Opportunity and Discrimination and Harassment Free Workplace Policies to ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of work and compensation issues, without the threat of reprisal, intimidation or harassment. For more information access the link:</p> <p>https://www.novelis.com/sustainability</p>

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	The Entity has developed the Workplace Violence Prevention Program Standard to ensure that it does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment and gender-based violence, including sexual harassment or verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	The Entity has developed the Employee Compensation Standard to ensure the Workers' rights to a minimum wage, and that wages are paid monthly and annually updated via the Hourly Wage Increase History Table which must be sufficient to meet the Workers' basic needs.
10.7b Remuneration (method of payment)	Conformance	The Entity has developed the Employee Compensation Standard to ensure the Workers' rights to a minimum wage, and that wages are paid monthly and annually updated via the Hourly Wage Increase History Table which must be sufficient to meet the Workers' basic needs.
10.8 Working Time	Conformance	The Entity has developed the Employee Compensation Standard to ensure Workers' rights for a working day that complies with local legislation, including Overtime, holidays and paid annual vacations.

PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Policy (Policy)	Conformance	<p>The Entity is certified in accordance with ISO 45001: https://www.novelis.com/wp-content/uploads/2022/05/Berea-ISO-45001-Certificate2-14.pdf</p> <p>The Entity has an Integrated System Policy, approved by the Senior Management. It is made available in the internal system and publicly disclosed on the website: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity is certified in accordance with ISO 45001 with the elaboration of an Integrated System Policy, approved by the Senior Management. It is made available in the internal system and publicly disclosed on the website: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p> <p>https://www.novelis.com/wp-content/uploads/2022/05/Berea-ISO-45001-Certificate2-14.pdf</p>

CRITERION	RATING	COMMENT
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity is certified in accordance with ISO 45001 with the elaboration of an Integrated System Policy according to international standards and ILO Conventions on Occupational Health and Safety, approved by the Senior Management. It is made available in the internal system and publicly disclosed on the Entity's website. For further information refer to the links: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf https://www.novelis.com/wp-content/uploads/2022/05/Berea-ISO-45001-Certificate2-14.pdf
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed several safety tools, including the 'Duty of Refusal' tool, which includes the employee's duty to understand the dangers and safe practices of their work and the authority to refuse or interrupt unsafe work. For further information refer to the links: https://www.novelis.com/wp-content/uploads/2022/05/Berea-ISO-45001-Certificate2-14.pdf https://www.novelis.com/suppliers/safety-absolutes
11.2 OH&S Management System	Conformance	The Entity has documented an Occupational Health and Safety Management System and is certified to ISO 45001. For further information refer to the links: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf https://www.novelis.com/wp-content/uploads/2022/05/Berea-ISO-45001-Certificate2-14.pdf
11.3 Employee engagement on health and safety	Conformance	Workers participate in improving the culture of safety and awareness through involvement in various committees. For further information refer to the link: https://www.novelis.com/suppliers/safety-absolutes
11.4 OH&S performance	Conformance	The Entity assesses its performance in Occupational Health and Safety through indicators monitored by the Entity's board and seeking continuous improvement of practices through periodically revised tools. For further information refer to the link: https://www.novelis.com/suppliers/safety-absolutes

Document Control and Version History

Revision	Date	Notes
0	30 June 2022	Initial Certification Audit – Full Certification