

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

NOVELIS

CERTIFICATE
NUMBER

64

ASI
STANDARD

CHAIN OF CUSTODY
(V1 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

SZI GMBH

DATE OF ISSUE

24 JANUARY 2020

DATE OF EXPIRY

23 JANUARY 2023

CERTIFIED SINCE

24 JANUARY 2020

AUTHORISED BY

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

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

CERTIFICATION SCOPE

All production lines (delivery, melting halls, rolling mills and storage) to produce aluminium coils at the Alunorf facility in Neuss, Germany; and, cold mill semi-finished products, packaging products and flexible tubes manufactured at the Novelis Ohle plant (Germany).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Novelis
ENTITY NAME	Novelis Europe
CERTIFICATION SCOPE	The certification scope included all production lines (delivery, melting halls, rolling mills and storage) to produce aluminium coils at the Alunorf facility in Neuss, Germany; and, cold mill semi-finished products, packaging products and flexible tubes manufactured at the Novelis Ohle plant (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Aluminium Re-melting/Refining• Post-casthouse
ASI STANDARD	<ul style="list-style-type: none">• Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	SZI GmbH
AUDIT DATE	21 . 29 August 2019
AUDIT REPORT SUBMISSION	27 November 2019
AUDIT SCOPE	Supply chain activities included in the audit scope: <ul style="list-style-type: none">• Casthouses• Aluminium Re-melting/Refining• Post-casthouse All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

24 January 2020 . 23 January 2023

NEXT AUDIT
TYPE

Surveillance

NEXT AUDIT
DUE DATE

24 July 2021

CERTIFICATION
NUMBER

64

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Alu Norf and Novelis Ohle are members of ASI. The membership has been checked.
1.2 Management system	Conformance	An "ASI Chain of Custody" management system exists. It is likely limited because the Entity has not yet sourced CoC Material, and therefore unable to effectively implement all parts of the system.
1.3 Management system reviews	Conformance	The requirements of the ASI Chain of Custody are met. The first management review is scheduled for early 2020.
1.4 Management representative	Conformance	A representative for ASI Chain of Custody is appointed.
1.5 Training	Conformance	ASI training and communication is regulated. Initial training has already been carried out.
1.6 Record keeping	Conformance	Processes for required ASI records and archives are defined. The retention period for the relevant CoC documents is at least 5 years.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	Embedded into the ASI SAP Process and mass balance system and only becomes relevant following first ASI reporting period.
1.7b Reporting to ASI (Input Percentage)	Not Applicable	Embedded into the ASI SAP Process and mass balance system and only becomes relevant following first ASI reporting period.
1.7c Reporting to ASI (Positive Balance)	Not Applicable	Embedded into the ASI SAP Process and mass balance system and only becomes relevant following first ASI reporting period.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	Embedded into the ASI SAP Process and mass balance system and only becomes relevant following first ASI reporting period.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	Embedded into the ASI SAP Process and mass balance system and only becomes relevant following first ASI reporting period.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	Embedded into the ASI SAP Process and mass balance system and only becomes relevant following first ASI reporting period.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	Not relevant, will not be using ASI Credits System.

CRITERION	RATING	COMMENT
2 OUTSOURCING CONTRACTORS		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	Currently not relevant as no outsourced contractors being used in current scope.
2.2a Control of CoC Material	Not Applicable	Currently not relevant as no outsourced contractors being used in current scope.
2.2b No further outsourcing	Not Applicable	Currently not relevant as no outsourced contractors being used in current scope.
2.2c Risk assessment	Not Applicable	Currently not relevant as no outsourced contractors being used in current scope.
2.3 Output Quantity	Not Applicable	Currently not relevant as no outsourced contractors being used in current scope.
2.4 Verification and record-keeping	Not Applicable	Currently not relevant as no outsourced contractors being used in current scope.
2.5 Error management	Not Applicable	Currently not relevant as no outsourced contractors being used in current scope.
3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL		
3.1a CoC Certification Scope . Bauxite Mining	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.1b ASI Performance Standard . Bauxite Mining	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.2a CoC Certification Scope . Alumina Refining	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Performance Standard . Alumina Refining	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.3a CoC Certification Scope . Aluminium Smelting	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
3.3b ASI Performance Standard . Aluminium Smelting	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL		
4.1a CoC Certification Scope . Aluminium Re-Melting/Refining	Conformance	Today no material for the post-casthouse is sourced from other CoC certified entities.
4.1b ASI Performance Standard . Aluminium Re-Melting/Refining	Conformance	The Entity (Alunorf) is certified against the ASI Performance Standard.
4.2a Pre-Consumer Scrap and Dross	Conformance	The Novelis Material Accounting System (SAP) records and balances CoC pre-consumer scrap and treated dross residues. It also records the respective suppliers.

CRITERION	RATING	COMMENT
4.2b Post-Consumer Scrap	Conformance	The Novelis Material Accounting System (SAP) records and balances CoC post-consumer scrap. It also records the respective suppliers.
4.3a Supplier records	Conformance	Novelis has implemented a system that monitors the suppliers of recyclable scrap and ensures that the following requirements are met: identity, principals and place/s of operation.
4.3b Cash payments	Not Applicable	'Not Applicable' as Novelis makes no cash payments.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope . Casthouses	Conformance	Currently no material for the casthouse is sourced from other CoC certified entities.
5.1b ASI Performance Standard . Casthouses	Conformance	The material accounting system (SAP) and the processes described ensure that only ASI material is produced from casthouses that are certified in accordance with the ASI performance standard. Alunorf is certified against the ASI Performance Standard.
5.2 Casthouse Products	Conformance	The Material Accounting System (SAP) ensures that ASI aluminium is securely identifiable and traceable. At least the ASI aluminium is given a number on the material.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope . Post-Casthouse	Conformance	The material accounting system (SAP) and the processes described ensure that only CoC material is produced from an entity that is in the CoC Certification scope.
6.1b ASI Performance Standard . Post-Casthouse	Conformance	The material accounting system (SAP) and the processes described ensure that only CoC material is produced from an entity that has an ASI Performance Standard certification.
6.1c Sourcing ASI Aluminium	Not Applicable	The Entity is not sourcing from another CoC Certified Entity or via traceable CoC documentation if from a trader or warehouse.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	The Novelis Supplier Code of Conduct is publicly available and a prerequisite for cooperation with suppliers (even if not COC material). The requirements of the ASI Performance Standard (1.2, Anti-corruption) are fulfilled. https://novelis.com/de/suppliers/

CRITERION	RATING	COMMENT
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	The Novelis Supplier Code of Conduct is publicly available and a prerequisite for cooperation with suppliers (even if not COC material). The requirements of the ASI Performance Standard (2.4, Responsible Sourcing)) are fulfilled. https://novelis.com/de/suppliers/
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	The Novelis Supplier Code of Conduct is publicly available and a prerequisite for cooperation with suppliers (even if not COC material). The requirements of the ASI Performance Standard (9.1, Human Rights Due Diligence) are fulfilled. https://novelis.com/de/suppliers/
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	The Novelis Supplier Code of Conduct is publicly available and a prerequisite for cooperation with suppliers (even if not COC material). The requirements of the ASI Performance Standard (9.9, Conflict Affected and High Risk Areas)) are fulfilled. https://novelis.com/de/suppliers/
7.2 Risk assessment	Conformance	To minimize the risk of non-compliance at suppliers (non-CoC material and recyclable scrap material), there is a risk assessment. Any necessary measures are derived from this and transferred to an action plan. This risk assessment is updated annually or carried out at new suppliers. The Entity undertakes measurable risk mitigation where risks of adverse impacts are identified.
7.3 Complaints mechanism	Conformance	A guided complaint process is implemented. If there are legal violations or deviations, these will be published by the permitted authority. https://www.bezreg-arnsberg.nrw.de/themen/u/umweltinspektionen_5/ui_b_mk/plettenberg/Novelis-Deutschland-GmbH_-_Plettenberg---21_06_2017.pdf https://www.emas.de/fileadmin/user_upload/umwelte_rklaerungen/reg/DE-137-00016_Aluminium-Norf-GmbH.pdf The Ethic Hotline (also for external stakeholders) is 08001806638
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has a Material Accounting System developed to govern and report on input quantity as well as output quantity of CoC material and Non CoC material.

CRITERION	RATING	COMMENT
8.2a Post-Consumer Scrap	Conformance	The Entity has a Material Accounting System developed to govern and report on input quantity of Post-Consumer Scrap.
8.2b Pre-Consumer Scrap (total)	Conformance	The Entity has a Material Accounting System developed to govern and report on input quantity of Pre-Consumer Scrap.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	The Entity has a Material Accounting System developed to govern and report on input quantity of pre-consumer scrap delivering both CoC material and Non-CoC material.
8.3 Material Accounting Period	Conformance	For the future, the material accounting period should be 12 months (always one calendar year).
8.4 Input Percentage	Conformance	The input percentage for the defined time period (12 months, calendar year) is calculated and recorded according to the given formula. At the time of the audit, there were no examples of records or implementation of the systems as there was no sourcing and transfer of CoC material.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The input percentage for the defined time period is calculated and recorded according to the given formula. At the time of the audit, there were no examples of records or implementation of the systems as there was no sourcing and transfer of CoC Material.
8.6 Output Quantity determination	Conformance	In order to determine the output of CoC material, the quantity is calculated on the basis of the calculated input quantity. This query can be done via SAP.
8.7 Output Quantity designation	Conformance	The Entity's Material Accounting System in SAP has been established to ensure that always only 100% aluminium is called CoC aluminium.
8.8 Output Quantity . Pre-Consumer Scrap	Conformance	The Material Accounting System (SAP) ensures that the absolute output quantity of CoC material (for example, the sum of the output quantity and the eligible scrap) is never more than the input quantity of CoC material.
8.9 Outputs not exceed inputs	Conformance	The Material Accounting System (SAP) ensures that the absolute output quantity of CoC material is never more than the input quantity to CoC material (relating to the material accounting period).
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Material Accounting System (SAP) ensures that a material overdraw of 20% is not exceeded.

CRITERION	RATING	COMMENT
8.10b Internal Overdraws (not exceed affected amount)	Conformance	In the event of a force majeure situation, the process (Material Accounting System and the interaction of trained personnel) should check that the internal material overdraw does not exceed the quantity due to the force majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	The internal overdraw due to a force majeure situation is cleared in the following material accounting period. This is verified by regular reviews (at least annually).
8.11a Positive Balance (carry over)	Conformance	The Entity's Material Accounting System and internal control mechanisms will assure that a positive balance is carried over to the subsequent material accounting period.
8.11b Positive Balance (expiry)	Conformance	The material accounting system (SAP) was considered on the basis of a live presentation. At the time of the audit, there were no examples of records or implementation of the systems as there was no sourcing and transfer of CoC material.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	When CoC material is sent, the relevant shipping documents are created by the Material Accounting System (SAP).
9.2a Date of issue	Conformance	A document management process is in place. The necessary documents contain (at least) the date of issue.
9.2b Reference number	Conformance	A document management process is in place. The necessary documents contain (at least) the reference number for the CoC document.
9.2c Issuing Entity	Conformance	A document management process is in place. The necessary documents contain (at least) the identity, address and CoC certification number of the Entity.
9.2d Receiving customer	Conformance	A document management process is in place. The necessary documents contain (at least) the identity and address of the customer receiving the CoC material.
9.2e Responsible employee	Conformance	A document management process is in place. The necessary documents contain (at least) the responsible employee of the Entity who can verify information in the CoC document.
9.2f Conformance statement	Conformance	A document management process is in place. The necessary documents contain (at least) a statement confirming that <i>the information provided in the CoC</i>

CRITERION	RATING	COMMENT
		<i>Document is in conformance with the ASI CoC Standard.+</i>
9.2g Type of CoC Material	Conformance	A document management process is in place. The necessary documents contain (at least) the type of CoC material in the shipment.
9.2h Mass of CoC Material	Conformance	A document management process is in place. The necessary documents contain (at least) the mass of CoC material in the shipment.
9.2i Mass of total material	Conformance	A document management process is in place. The necessary documents contain (at least) the mass of total material in the shipment.
9.3a Sustainability Data (optional)	Conformance	In addition to the requirements of item 9.2, the following environmental data are also identified and included in the documentation: - average intensity of GHG emissions - ASI Certification status (post-casthouse).
9.3b Sustainability Data (passing on)	Conformance	In addition to the requirements of item 9.2, the following environmental data are also identified and included in the documentation: - average intensity of GHG emissions
9.3c Post-Casthouse ASI Certification status	Conformance	In addition to the requirements of item 9.2, the following environmental data are also identified and included in the documentation: - ASI Certification status for the ASI Performance Standard.
9.4 Supplementary Information (optional)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
9.5 Response to verification requests	Conformance	The contact person indicated on the ASI documents is responsible for processing inquiries. All necessary information is stored in SAP.
9.6 Error management	Conformance	If there are errors when shipping CoC material, a root cause analysis is started immediately. In addition, an 8D report will be created. The report specifies the type of complaint, responsibilities and measures to remedy the defect.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	If CoC material is to be procured, the relevant accompanying documents are checked by the goods receipt and stored in the system (SAP). The processes have been implemented, even if they could not be verified for effectiveness until CoC Material is sourced.

CRITERION	RATING	COMMENT
10.2 Verify consistency with shipments	Conformance	Upon receipt of CoC material, compliance with the relevant CoC documents is performed. The staff employed is trained. Data is not transferred to the main accounting system until the reconciliation has taken place. The processes have been implemented, even if they could not be verified for effectiveness until CoC Material is sourced.
10.3 Verify supplier CoC Certification status	Conformance	If CoC material is procured, it will be asked in advance if the supplier meets the requirements of the ASI CoC. There is a supplier list that is kept up to date at all times. The processes have been implemented, even if they could not be verified for effectiveness until CoC Material is sourced.
10.4 Error management	Conformance	If there are errors or even a recall when shipping CoC material, a root cause analysis is started immediately. In addition, a special report (8D) will be created. The report specifies the type of complaint, responsibilities and measures to remedy the defect.

11 MARKET CREDITS SYSTEM: ASI CREDITS

11.1a Material Accounting System . allocation	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.1b Link to Casthouse Products	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.1c No double counting	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.2a Date of issue	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.2b Reference number	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.2c Issuing Entity	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.2d Receiving Entity	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.2e Conformance statement	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.2f ASI Credits statement	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.

CRITERION	RATING	COMMENT
11.2g Quantity	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.3a CoC Certification Scope . purchasing ASI Credits	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.3b Material Accounting System . purchasing	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.3c Expiry	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.3d No re-trading	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.3e No allocation to physical products	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable as the Entity does not intend to utilize the ASI market credits system.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	The Entity has documented and allocated responsibilities for a claims and communication when or if they make any claims. This will fulfil all requirements of the ASI Claims Guide.
12.1b Verifiable evidence	Conformance	The Entity has documented and allocated responsibilities for a claims and communication when or if they make any claims. This will fulfil all requirements of the ASI Claims Guide.
12.1c Employee training	Conformance	The Entity has documented and allocated responsibilities for a claims and communication when or if they make any claims. This will fulfil all requirements of the ASI Claims Guide. Relevant employees are well trained.