

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

NOVELIS EUROPE

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

Novelis Europe Chain of Custody certification includes regional management functions in Zurich (Switzerland) and production facilities in Sierre (Switzerland), Latchford (United Kingdom), Pieve, Bresso (Italy), Ohle, Goettingen, Nachterstedt and the joint venture site Alunorf (Germany).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc
ENTITY NAME	Novelis Europe
CERTIFICATION SCOPE	Novelis Europe Chain of Custody certification includes regional management functions in Zurich (Switzerland) and production facilities in Sierre (Switzerland), Latchford (United Kingdom), Pieve, Bresso (Italy), Ohle, Goettingen, Nachterstedt and the joint venture site Alunorf (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (21 – 29 August 2019)Scope Change Audit (7 September 2020 – 2 January 2021)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">21 – 29 August 2019 (Initial Certification Audit)7 September 2020 – 2 January 2021 (Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">27 November 2019 (Initial Certification Audit)13 March 2021 (Scope Change Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (21 – 29 August 2019)</u></p> <p>The audit scope included the joint venture site Aluminium Norf (Alunorf) (Germany) and Ohle (Germany).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesPost-Casthouse <p>All applicable criteria in the ASI Chain of Custody Standard were included in the audit scope.</p> <p><u>Scope Change Audit (7 September 2020 – 2 January 2021)</u></p> <p>The audit scope included Novelis AG (Switzerland), Gottingen, Nachterstedt Recycling and Nachterstedt Rolling (Germany).</p>

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Post-Casthouse

All relevant Criteria in the ASI Chain of Custody Standard were included in the audit scope.

AUDIT
OUTCOME

- Certification
-

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

24 January 2020 – 23 January 2023

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

23 July 2021

CERTIFICATION
NUMBER

64

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Novelis within all entities are members of ASI. The membership has been checked, details available at: https://aluminium-stewardship.org/about-asi/asi-members/novelis-inc/
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 Standard are met. The first management review is scheduled for early 2021.
1.4 Management representative	Conformance	A representative for ASI Chain of Custody Standard 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)	Conformance	Embedded into the ASI SAP Process and Mass Balance System and only becomes relevant following first ASI reporting period. A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7b Reporting to ASI (Input Percentage)	Conformance	Embedded into the ASI SAP Process and Mass Balance System and only becomes relevant following first ASI reporting period. A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7c Reporting to ASI (Positive Balance)	Conformance	Embedded into the ASI SAP Process and Mass Balance System and only becomes relevant following first ASI reporting period. A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	Embedded into the ASI SAP Process and Mass Balance System and only becomes relevant following first ASI reporting period. A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7e Reporting to ASI (Eligible Scrap)	Conformance	Embedded into the ASI SAP Process and Mass Balance System and only becomes relevant following

CRITERION	RATING	COMMENT
		first ASI reporting period. A report has not yet been issued, as at the time of the audit, there has been no sourcing of CoC Material by the Entity.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	Not relevant, will not be using ASI Credits System.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	Not relevant, will not be using ASI Credits System.
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		

CRITERION	RATING	COMMENT
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Conformance	All metal inputs received into Novelis plants within the Chain of Custody scope are assessed as described under eligibility and due diligence processes. Processes also exist for ordering and receiving CoC Material into casthouses of remelting/recycling centres and receiving CoC Material into post-casthouse facilities e.g rolling and finishing plants.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Conformance	All metal inputs received into Novelis plants within the Chain of Custody scope are assessed as described under eligibility and due diligence processes. Processes also exist for ordering and receiving CoC Material into casthouses of remelting/recycling centres and receiving CoC Material into post-casthouse facilities e.g rolling and finishing plants.
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.
4.2b Post-Consumer Scrap	Conformance	All metal inputs received into Novelis plants within the Chain of Custody scope are assessed as described under eligibility and due diligence processes. Processes also exist for ordering and receiving CoC Material into casthouses of remelting/recycling centres and receiving CoC Material into post-casthouse facilities e.g rolling and finishing plants.
4.3a Supplier records	Conformance	Novelis has implemented a system that monitors the suppliers of recyclable scrap and record the identity, principals and place/s of operation.
4.3b Cash payments	Not Applicable	Novelis makes no cash payments.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a CoC Certification Scope – Casthouses	Conformance	All metal inputs received into Novelis plants within the Chain of Custody scope are assessed as described under eligibility and due diligence processes. Processes also exist for ordering and receiving CoC Material into casthouses of remelting/recycling centres and receiving CoC Material into post-casthouse facilities e.g rolling and finishing plants.
5.1b ASI Performance Standard – Casthouses	Conformance	The Material Accounting System (SAP) and the processes described ensure that only ASI Material is

CRITERION	RATING	COMMENT
		produced from casthouses that are certified in accordance with the ASI Performance Standard.
5.2 Casthouse Products	Conformance	The Material Accounting System (SAP) ensures that ASI aluminium is securely identifiable and traceable. At minimum, 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	Conformance	All metal inputs received into Novelis plants within the Chain of Custody scope are assessed as described under eligibility and due diligence processes. Processes also exist for ordering and receiving CoC Material into casthouses of remelting/recycling centres and receiving CoC Material into post-casthouse facilities e.g rolling and finishing plants.
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. The Code is available at: https://de.novelis.com/wp-content/uploads/2020/04/Novelis-Supplier-Code-of-Conduct.pdf
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. The Code is available at: https://de.novelis.com/wp-content/uploads/2020/04/Novelis-Supplier-Code-of-Conduct.pdf
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,

CRITERION	RATING	COMMENT
		Human Rights Due Diligence) are fulfilled. The Code is available at: https://de.novelis.com/wp-content/uploads/2020/04/Novelis-Supplier-Code-of-Conduct.pdf
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. The Code is available at: https://de.novelis.com/wp-content/uploads/2020/04/Novelis-Supplier-Code-of-Conduct.pdf
7.2 Risk assessment	Conformance	Novelis has implemented procedures to assess the risks of non-compliance with its Responsible Sourcing Policy by its suppliers of Non-CoC and Recyclable Scrap Material. 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	The Entity has established complaints mechanisms to raise concerns through different channels, such as the company website: http://novelis.com/contact-us/ or Ethics Hotline: https://secure.ethicspoint.com/domain/media/en/gui/57484/index.html
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	Novelis has developed a system for recording, reporting and documenting the flow of material with the Novelis ASI entity mass balance. The approach is embedded into the SAP and BI Processes. The mass balance system becomes relevant following first ASI reporting period. As there has been no transfer of CoC Material at the time of the first Certification Audit, the effectiveness of this CoC mass balance system will be assessed at the next Surveillance Audit.
8.2a Post-Consumer Scrap	Conformance	Novelis has a Material Accounting System developed. Record of the breakdown of recyclable scrap (included input quantity of post-consumer scrap) is integrated within the Material Accounting System. The effectiveness of this Material

CRITERION	RATING	COMMENT
		Accounting System will be assessed during the next Surveillance Audit.
8.2b Pre-Consumer Scrap (total)	Conformance	Novelis has developed a Material Accounting System that covers ASI CoC Standard requirements including recording of the breakdown of recyclable scrap (included input quantity of total pre-consumer scrap).
8.2c Pre-Consumer Scrap (Eligible Scrap)	Conformance	Novelis has developed a Material Accounting System that covers ASI CoC Standard requirements including recording of the breakdown of recyclable scrap (included input quantity of pre-consumer scrap that is eligible scrap).
8.3 Material Accounting Period	Conformance	Novelis has defined a Material Accounting Period of 12 months by following the Financial Year (April-March).
8.4 Input Percentage	Conformance	The input percentage for the defined time period (Financial Year (April- March)) is calculated and recorded according to the given formula. The effectiveness of the Material Accounting System interacting with the given formula will be assessed during next Surveillance Audit.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Conformance	The input percentage for the defined time period (Financial Year (April- March)) is calculated and recorded according to the given formula. The effectiveness of the Material Accounting System interacting with the given formula will be assessed during next Surveillance Audit.
8.6 Output Quantity determination	Conformance	Novelis uses the input percentage for the material accounting period to determine the output quantity of CoC Material, by mass.
8.7 Output Quantity designation	Conformance	Novelis' Material Accounting System has been established to ensure that the output quantity of CoC Material is designated as 100% CoC Material.
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	Novelis has implemented appropriate processes to check that the total output of CoC Material and eligible scrap does not proportionally exceed the input percentage as applied to total input of CoC Material and eligible scrap over the material accounting period.

CRITERION	RATING	COMMENT
8.10a Internal Overdraws (not exceed 20%)	Conformance	The Material Accounting System (SAP) ensures that a material overdraw of 20% is not exceeded.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	Novelis' Material Accounting System is designed to ensure that the internal overdraw will not exceed the amount of CoC Material affected by a force majeure situation.
8.10c Internal Overdraws (period to make up)	Conformance	Novelis' Material Accounting System is designed to ensure that the internal overdraw will be made up within the subsequent material accounting period.
8.11a Positive Balance (carry over)	Conformance	Novelis' Material Accounting System is designed to ensure that any carry over of a positive balance is clearly identified.
8.11b Positive Balance (expiry)	Conformance	Novelis' Material Accounting System is designed to ensure that any positive balance of output CoC Material at the end of the material accounting period will be carried over to the subsequent period and that such carry over will expire at the end of that period if not drawn down.
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 "The information provided in the CoC

CRITERION	RATING	COMMENT
		Document is in conformance with the ASI CoC Standard.”
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: <ul style="list-style-type: none"> - average intensity of GHG emissions. - ASI Certification status (post-casthouse). The Entity will upon request by customers provide Sustainability data if available.
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: <ul style="list-style-type: none"> - average intensity of GHG emissions. The Entity will upon request by customers provide Sustainability data if available.
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: <ul style="list-style-type: none"> - ASI Certification status for the ASI Performance Standard. The Entity will upon request by customers provide Sustainability data if available.
9.4 Supplementary Information (optional)	Conformance	All CoC Material issued is accompanied by the appropriate documentation. Any supplementary information will be capable of support by objective evidence.
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 (the Material Accounting System).
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.

CRITERION	RATING	COMMENT
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.
10.2 Verify consistency with shipments	Conformance	Novelis has developed a system for recording, reporting and documenting the flow of material with the Novelis ASI entity mass balance. This includes: <ul style="list-style-type: none"> • Calculating the CoC input percentage for the relevant period. • Detecting and managing any errors. • Creating and distributing CoC documentation to accompany sale of CoC Material. • Annual reporting to the ASI Secretariat. The approach is embedded into the SAP and BI processes. 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 Standard. 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.

CRITERION	RATING	COMMENT
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.
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	Novelis has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. As there has been no claims regarding CoC at the time of the first Certification Audit, the effectiveness of the procedure will be assessed at the next Surveillance Audit.
12.1b Verifiable evidence	Conformance	Novelis has implemented a procedure for claims related to CoC Material consistent with the ASI Claims Guide. As there has been no claims regarding CoC at the time of the first Certification Audit, the effectiveness of the procedure will be assessed at the next Surveillance Audit.

CRITERION	RATING	COMMENT
12.1c Employee training	Conformance	Novelis has trained relevant employees regarding ASI claims and/or representations.

Document Control and Version History

Revision	Date	Notes
0	24 January 2020	Initial Certification Audit (Full Certification)
1	31 March 2021	Scope Change Audit to include Sierre Novelis AG (Switzerland), Gottingen, Nachterstedt Recycling and Nachterstedt Rolling (Germany), as well as applying a multi-site approach that now specifically lists all sites that were previously included under the initial certification scope.