
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NOVELIS UK LTD (LATCHFORD)

CERTIFICATE
NUMBER

125

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

SZI GmbH

DATE OF ISSUE

31 MARCH 2021

DATE OF EXPIRY

30 MARCH 2022

CERTIFIED SINCE

31 MARCH 2021

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

All activities on the Latchford site to produce aluminium products including shredding, decoating, melting and casting.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis UK Ltd (Latchford)
CERTIFICATION SCOPE	All activities on the Latchford site to produce aluminium products including shredding, decoating, melting and casting.
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">Certification Audit
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">18 January – 6 March 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">18 March 2021
AUDIT SCOPE	<p>The audit scope includes all activities on the Latchford site to produce aluminium products including shredding, decoating, melting and casting.</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> <p>At the time of the Audit (January – March 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional 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

31 March 2021 – 30 March 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

30 September 2021

CERTIFICATE
NUMBER

125

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. There are systems in place to maintain awareness of and ensure compliance with applicable law. The Entity holds ISO 14001 and OHSAS 18001 certifications from an accredited certification body. Corporate supports the site with legal counsel.</p> <p>However, frequencies to regularly update the legal compliance register are not determined yet.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against corruption in all its forms, consistent with applicable law and prevailing international standards. Among the instruments, a Code of Conduct is issued and communicated internally and externally. The Entity has provided training to employees with regards to business ethics. Corporate Headquarters operates a whistleblowing hotline where potential breaches or suspected corruption can be reported confidentially.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance. The Novelis Group Code of Conduct can be accessed via: https://www.novelis.com/wp-content/uploads/2015/09/ENG_CodeofConduct06.pdf</p> <p>The Supplier Code of Conduct is available via: https://novelis.com/wp-content/uploads/2020/04/Novelis-Supplier-Code-of-Conduct.pdf</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Novelis Group Environment, Health, Quality, Safety (EHQS) Policy is communicated both internally and externally. Internal communication is ensured through annual trainings and informational announcements. The external communication is given via Novelis webpage: https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p>

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>In accordance with the ASI Performance Standard as well as their EHSQ Policy, the Entity has senior management endorsement and support through provision of resources and regularly review the policies. The Entity obtained ISO 14001, ISO 9001 and BS OHSAS 18001:2007 certifications which are consistent with their ASI Certification Scope.</p> <p>https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Novelis EHSQ Policy is continuously communicated both internally and externally. Internal communication is ensured through annual trainings and informational announcements. A copy of the latest EHS policy can be found via:</p> <p>https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p>
2.2 Leadership	Minor Non-Conformance	<p>The Novelis CEO has corporate responsibility and authority to ensure conformance with the Performance Standard. However, no senior management representative, having overall responsibility and authority for ensuring conformance with this ASI Performance Standard, has been nominated on Entity level.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has documented and implemented an Environmental Management System according to ISO 14001. The Management System is certified by an accredited certification body.</p>
2.3b Environmental and Social Management Systems (social)	Minor Non-Conformance	<p>The Entity has documented an Environmental Management System which has been certified according to ISO 14001:2015. Furthermore the Entity has implemented and fulfills the requirements of a Social Management System (SA 8000). However, the Entity did not yet schedule surveillance frequencies for internal social audits or integrate these social items into their internal audit program.</p>
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity's Supplier Code of Conduct is in accordance with requirements of the ASI Performance Standard. The Novelis Supplier Code of Conduct can be found via:</p> <p>https://www.novelis.com/wp-content/uploads/2020/04/Novelis-Supplier-Code-of-Conduct.pdf</p>

CRITERION	RATING	COMMENT
		However, the Entity has departed from its defined process and shall approve and maintain suppliers and service providers in accordance to its pre-defined responsible sourcing aspects (supplier screening).
2.5 Impact Assessments	Conformance	As part of the internal risk assessments, the influencing factors such as environment, social, human rights are recorded and evaluated in the context of new projects and system changes. No new bigger projects or major changes to existing facilities took place since the Entity joined ASI. The site is located in a highly regulated country (UK), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorization process (including Human Rights). The Entity has systems in place to manage this effectively.
2.6 Emergency Response Plan	Conformance	The Entity has a well implemented and trained Emergency Response Plan. External stakeholders like community and authority are involved. There are regular trainings with the local fire fighters, the community and workers.
2.7 Mergers and Acquisitions	Conformance	Acquisitions executed by Novelis Headquarters are accompanied by a due diligence process and supported by external specialists to reflect environmental, social and governance issues.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity systematically reviews environmental, social and governance issues as part of the Entity's planning process. Closure, decommissioning and divestment are not managed on local level but by Corporate Headquarters. There were no closure, decommissioning and divestment plans for the audited Entity since they joined ASI.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Minor Non-Conformance	The Entity is part of the Novelis Group sustainability reporting. The Group publicly disclosed its governance approach and its material environmental, social and economic impacts in the Novelis Group Sustainability Report: https://www.novelis.com/wp-content/uploads/2020/04/Novelis-2018-Sustainability-Report-Final-lowres.pdf However, the Novelis Sustainability Report has not been updated since 2018. The newly established Purpose Report 2020 does not include the

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		necessary sustainability data as required by ASI Performance Standard.
3.2 Non-compliance and liabilities	Conformance	<p>Entity specific information on significant fines, judgments, penalties and non-monetary sanctions are published by UK government. Public access is ensured via the UK Act 1974. The Public Register of Prosecutions by the Health and Safety Executive is found here: https://www.hse.gov.uk/enforce/convictions.htm</p> <p>The Public Register of Prosecutions by the Environment Agency is found here: https://environment.data.gov.uk/public-register/view/search-enforcement-action</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>The Entity complies with the strict local legislation and has implemented policies and procedures to conform to this requirement.</p> <p>To prevent corruption, detailed behaviours are described in the Novelis Code of Conduct. It is precisely regulated, for example, which payments are made to authorities.</p>
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 is certified ISO 14001:2015 and BS OHSAS 18001 and has implemented fair complaints resolution mechanisms. A whistleblowing hotline is in place.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>In cooperation with an external consultant, life cycle evaluations were carried out. As a tool, the Sima Pro software is used.</p> <p>The requirements of ISO 14040 are fulfilled.</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The Entity contributes life cycle inventory data to regional initiatives e.g Aluminum Association and European Aluminium Sustainable Development Indicators (SDI): https://www.european-aluminium.eu/media/1998/2017-01-30-epd3-anodised-sheet-novelis.pdf</p> <p>Life Cycle Assessments will be delivered to customers for their products by request (they are including the cradle to gate process).</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	LCA's are available for the relevant products. Relevant data can be accessed via the European Aluminium SDI: https://www.european-

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		aluminium.eu/media/1998/2017-01-30-epd3-anodised-sheet-novelis.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	A working scrap management is implemented. Aluminium process scrap should be reduced to a minimum, if scrap is generated it will be 100% recycled or reused.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	There is a closed-loop production. Aluminium alloys and grades are recorded separately and recycled according to type.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	An aluminium recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate is aimed for. The recycling strategy captures the product from the beginning to end of life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	An aluminium recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate is aimed for. Novelis is actively engaged in European initiatives or groups that support and improve national collection rates.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The plant is part of the International Greenhouse Gas Trade. EHS figures such as energy consumption, emissions, waste numbers and water consumption are visible in working areas (shopfloor). However, the energy use by source on an annual basis isn't publicly disclosed. In the Novelis Purpose Report 2020 only consolidated key figures on corporate basis have been published, see page 31: https://www.novelis.com/wp-content/uploads/2020/11/2020-Purpose-Report-ENG-Page.pdf
5.2 GHG emissions reductions	Minor Non-Conformance	Environmental activities to reduce energy consumption and as such greenhouse gas (GHG) emissions are undertaken. GHG emissions KPI's and targets are provided in the Sustainability Report https://de.novelis.com/wp-content/uploads/2020/04/Novelis-2018-Sustainability-Report-Final-lowres.pdf However, the Novelis Sustainability Report has not been updated since 2018 and the newly

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		established Purpose Report 2020 does not include the necessary data.
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	Emissions to the air are under tight control according to local regulations and permits. The emissions are monitored, controlled and reduced constantly.
6.2 Discharges to Water	Conformance	Contamination of waters have to be reported to the authority in accordance with the Water Act 2014 and permits without delay. Regular routine water checks are carried out. Emissions to water that have adverse effects on humans and the environment are under UK law and in line with the operation permit of the Latchford plant. Emissions to water and the risk of emissions to soil are subject to environmental goals published in the report of the Emission Protection Officer (EHS Manager).
6.3a Assessment and Management of Spills and Leakage (assessment)	Unable to Rate	The Entity performed risk assessments and implemented measures to prevent and detect contamination of air, water and soil. Furthermore, regular internal audits are conducted to verify effectiveness and adherence to defined actions. Emergency procedures for major risk areas have been introduced. We have assessed this Criteria as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity performed risk assessments and implemented prevention measures on material leakages. Relevant spills are reported to the Authority and by the Authority to all other relevant public interest parties (if necessary).
6.4a Reporting of Spills (immediate disclosure)	Conformance	The reporting of spills is regulated, trained and tested. There have been no reportable spills

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		inside/outside the plant since ISO 14001 was implemented in 1999.
6.4b Reporting of Spills (regular reporting)	Conformance	The reporting of spills is regulated, trained and tested. There are regular visits by the state environmental authorities. There have been no reportable spills inside/outside the plant since ISO 14001 was implemented in 1999.
6.5a Waste management and reporting (strategy)	Unable to Rate	The Entity implemented a Waste Management Strategy. The goals in the field of waste management are fulfilled. A reduction of the waste stream is recognizable. The Entity's Waste Management Strategy has been completed in accordance with the waste mitigation hierarchy. We have assessed this Criteria as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Authority may, if necessary, request the report of the waste officer. On request, the quantities of hazardous and non-hazardous waste will be made available to the public. Regular monitoring by the district government verifies compliance with legal requirements. However, not all quantities of hazardous and non-hazardous waste generated by the Entity and associated waste disposal method has been publicly disclosed annually.
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 (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.

CRITERION	RATING	COMMENT
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)	Unable to Rate	100% of the white dross is recycled internally. After treating the black dross with argon and cooled to stop the oxidation process, it is sent to external local contractors, who treats the dross and return it as aluminium bars. We have assessed this Criteria as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
6.8b Dross (recycling)	Unable to Rate	100% of the white dross is recycled internally. After treating the black dross with argon and cooled to stop the oxidation process it is sent to external local contractors, who treats the dross and return it as aluminium bars. We have assessed this Criteria as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
6.8c Dross (review of alternatives)	Unable to Rate	100% of the white dross is recycled internally. After treating the black dross with argon and cooled to stop the oxidation process it is sent to external local contractors, who treats the dross and return it as aluminium bars. We have assessed this Criteria as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity tracks its water usage according to local regulations. An overview of the water entrances, the various consumers and the different wastewater flows are described and regularly reviewed.
7.1b Water assessment (risk assessment)	Conformance	The Entity assessed its water-related risks and implemented prevention measures accordingly in their entire area of influence.
7.2a Water management (management plans)	Unable to Rate	The Entity has implemented targets for its water management. The targets are regularly reviewed

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		<p>during authority visits as well as during the Environmental Management System review on an annual basis.</p> <p>We have assessed this Criteria as 'Unable to Rate', until the Entity can be assessed during the on-site audit.</p>
7.2b Water management (monitoring)	Unable to Rate	<p>Water management is implemented. Consumption figures and specifications are regularly monitored and reviewed.</p> <p>We have assessed this Criteria as 'Unable to Rate', until the Entity can be assessed during the on-site audit.</p>
7.3 Disclosure of water usage and risks	Minor Non-Conformance	<p>The required water law approvals are available. The requirements of the Water Act 2014 are met. Through regular inquiries of the state environmental authorities, the requirements are checked. In the Novelis Purpose Report 2020 only consolidated key figures on corporate basis have been published, see page 31:</p> <p>https://www.novelis.com/wp-content/uploads/2020/11/2020-Purpose-Report-ENG-Page.pdf</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>Environmental Risk Assessments are carried out as part of approval procedures. The risk assessment covers the entire influence area of the Latchford plant location including an assessment of biodiversity impacts. Actual permit:</p> <p>https://environment.data.gov.uk/public-register/industrial-installations/registration/BL6802IU?_pageState=result-all</p>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	<p>There were no material biodiversity impacts identified in the risk assessment. If necessary, biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently there are no open measures.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	<p>There were no material biodiversity impacts identified in the risk assessment. If necessary, biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently there are no open measures.</p> <p>Issues of biodiversity are also subject to any operating permit. Even though no material impact has been identified, actions were taken to prevent biodiversity impacts.</p>

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8.2c Biodiversity management (reporting)	Conformance	Even though no material impact has been identified, there are regular reporting processes during the annual management review and the public report of the state environmental authorities.
8.3 Alien Species	Conformance	The Entity has taken preventive actions to prevent introduction of alien species. Packaging material used for export materials (e.g. wooden pallets, NIMP15) are thermally treated to eliminate risk of alien species being introduced to other regions.
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	Novelis publicly subscribes to the United Nations Guiding Principles and has issued and communicated both its Code of Conduct (Promote a Desirable Work Environment) and Supplier Code of Conduct (Labour and Human Rights), which includes a commitment to respect human rights. The Codes can be accessed via: https://novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf and: https://novelis.com/wp-content/uploads/2020/04/Novelis-Supplier-Code-of-Conduct.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Code of Conduct including human rights aspects. As part of a risk assessment, the requirements of human rights within the area of influence of the Entity were examined. The focus here is a preventive approach to identify legal issues in advance.
9.1c Human Rights Due Diligence (remediation)	Conformance	The local compliance assessment (acc. SA 8000) have confirmed that there are no salient adverse human rights impacts present at the audited site. The Entity did not identify any issue that have

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		caused or contributed to adverse human rights impacts.
9.2 Women's Rights	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to the women's rights requirements. Novelis has identified the need to overcome the historical disadvantage of women as one of its priorities and has established the program "Woman in Novelis" (WiN). This program aims to motivate, retain and develop all employees, with a focus on building and celebrating a diverse culture that includes female employees.
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	Up to now, no expansion of the entire plant is planned which may have impact on this Criterion. However, the requirements of the ASI Performance Standard will be considered as part of new risk assessment.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion does not apply to the Entity, as no resettlements are being considered or have taken place during the period since joining ASI, or expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity does not claim any resources that could lead to a lack of resources in the area and among its population. The Entity respects and is very sensitive to the neighbourhood, the community and all other interest groups in the vicinity of the work. An evaluation of the interested parties took place.
9.7b Local Communities (impacts)	Conformance	The Social Self Assessment (SA 8000) confirmed that there are no issues with local communities and

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		therefore no need for action. However, the Entity prevents any adverse impacts on local community livelihoods.
9.7c Local Communities (livelihoods)	Conformance	The Novelis Group requests each of its sites to engage with local communities. See the Novelis-Neighbour Program: https://www.novelisrecycling.co.uk/corporate-social-responsibility/novelis-neighbour/
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has strict procedures to ensure it doesn't contribute in any way to human rights abuses in high-risk areas.
9.9 Security practice	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 9.9 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.1 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.1 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.1 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.

CRITERION	RATING	COMMENT
10.2a Child Labour (minimum age)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.2 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.2b Child Labour (hazardous)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.2 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.2c Child Labour (worst forms)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.2 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.3a Forced Labour (human trafficking)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.3 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.3b Forced Labour (deposits, fees, advances)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.3 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.3c Forced Labour (migrant workers)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.3 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to

CRITERION	RATING	COMMENT
		Rate', until the Entity can be assessed during the on-site audit.
10.3d Forced Labour (debt bondage)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.3 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.3e Forced Labour (freedom of movement)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.3 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.3 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.3g Forced Labour (freedom to terminate employment)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.3 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.4 Non-Discrimination	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.4 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.5 Communication and engagement	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a

CRITERION	RATING	COMMENT
		physical assessment of Criterion 10.5 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.6 Disciplinary practices	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.6 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.7a Remuneration (living wage)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.7 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.7b Remuneration (method of payment)	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.7 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
10.8 Working Time	Unable to Rate	Whilst records relating to the systems were reviewed and assessed as being up to date and in conformance with the ASI Performance Standard, a physical assessment of Criterion 10.8 to determine performance was not undertaken. We have therefore assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is OHSAS 18001 certified by an accredited certification body, therefore it is eligible for harmonization. The Entity has implemented and communicated it's EHS Policy as required by the ASI Performance Standard.

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Novelis Health and Safety Policy is applied to workers and visitors. Instruments and institutions are implemented as foreseen by local law (H&S committee, workplace risk assessment etc.) or by Novelis internal instructions. Many activities are set (e.g. best behaviour practice, safety culture etc.) to reduce workplace related risks. For further information see:</p> <p>https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>A Health and Safety Policy (guidelines) is in place and published. It is made accessible to all employees, visitors and suppliers (intranet / internet). The Policy includes the obligation to comply with legal requirements:</p> <p>https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>Employees are regularly briefed on the dangers at the workplace (based on the risk assessment). They have the right and obligation to report unsafe conditions and stop the work immediately if necessary.</p>
11.2 OH&S Management System	Conformance	<p>A Health and Safety Management System in accordance with BS OHSAS 18001 is in place. Any identified non-conformances are being actioned by the Entity. The certificate is valid and covers the full Entity's ASI Certification Scope. The Entity's Health and Safety Management System is well implemented. Internal and external audits are conducted to confirm effectiveness of the system.</p>
11.3 Employee engagement on health and safety	Conformance	<p>Employees are involved in the preparation of risk assessments. The safety officers have a mandate in the regular Occupational Health and Safety Committees (4 x year).</p>
11.4 OH&S performance	Conformance	<p>The continuous improvement of occupational health and safety performance is driven by performance indicators and the achievement of goals. Occupational health and safety committee meetings take place four times a year. There is a review of the numbers and the targets and measures are discussed and coordinated. The performance measures include lagging and leading indicator.</p>

Document Control and Version History

Revision	Date	Notes
0	31 March 2021	Initial Certification Audit – Provisional Certification