
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NOVELIS KOREA LIMITED

CERTIFICATE
NUMBER

140

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES UK
LTD

DATE OF ISSUE

21 JUNE 2021

DATE OF EXPIRY

20 JUNE 2024

CERTIFIED SINCE

21 JUNE 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

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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

The manufacture of aluminium and aluminium coil and sheet which includes the processes of recycling and remelting at the Yeongju Plant, Korea.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Korea Limited
CERTIFICATION SCOPE	The manufacture of aluminium and aluminium coil and sheet which includes the processes of recycling and remelting at the Yeongju Plant, Korea.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation)
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">24 – 28 May 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">9 June 2021
AUDIT SCOPE	<p>The audit scope includes all activities at the Novelis Korea Yeongju Plant located in Yeongju-si, Korea.</p> <p>Products produced in the Entity are aluminium coil for cans, automotive products and the IPG (Industrial Product Group) which produces electronic products and construction parts.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation) <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

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

21 June 2021 – 20 June 2024

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

20 December 2022

CERTIFICATE
NUMBER

140

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented a policy, procedure and process to maintain awareness of and ensure compliance with applicable laws. The Entity has provided training to employees and workers to ensure awareness of, and compliance evaluation is conducted to ensure compliance with applicable laws.
1.2 Anti-Corruption	Conformance	Policies related to Anti-Corruption are established, and it is addressed in the Novelis Code of Conduct, and Supplier Code of Conduct. Training on the Novelis Code of Conduct is provided with employees, and Novelis Supplier Code of Conducts is signed, and acknowledged by suppliers. Novelis Code of Conduct is accessible at: https://www.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf and Supplier Code of Conduct (in Korean) is accessible at: https://www.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-KOR-A4-04292021.pdf
1.3 Code of Conduct	Conformance	The Entity has established and implemented its Code of Conduct and Supplier Code of Conduct including principles related to environmental, social, governance, and commitment to local communities. The Entity has provided employees, and suppliers with training, and communication on the Code of Conduct. More information of Novelis Code of Conduct is accessible at: www.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf and Supplier Code of Conduct (in Korean) is accessible at: www.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-KOR-A4-04292021.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has established policies, systems, procedures, and processes that conform to the requirements of environmental, social, and governance principles. Policies are accessible at the Entity's intranet for communication with workers. The Entity's Environment, Health & Safety Policy is accessible at the website:

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		www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Senior management demonstrates a commitment to the implementation of policies, endorsement, and support to provide sufficient resources for regular review of policies to ensure conformance with ASI Performance Standard requirements.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The policies are available for internal and external stakeholders by communication through the Entity's intranet, and via the Entity's website and on-site. More information is accessible through:</p> <p>www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p> <p>www.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf</p>
2.2 Leadership	Conformance	A Senior Management representative has been nominated, and the responsibility and authority of each assigned personnel, and their key roles are defined to implement the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented and documented an Environmental Management System and maintains a valid ISO 14001:2015, Environmental Management System Certification.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established and maintained an integrated social management system manual to manage relevant ASI Performance Standard. The Entity has implemented and documented an Occupational Health and Safety Management System, and maintains a valid ISO 45001:2018, Occupational Health and Safety Management System Certificate.
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity has developed and implemented a policy, system, and processes that conform to the responsible sourcing requirements. Major suppliers are signed to comply with the Entity's Supplier Code of Conduct accessible at the Entity's website:</p> <p>www.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-KOR-A4-04292021.pdf</p> <p>and the Entity conducts supplier audits to major next tier suppliers. However, one minor non-conformance is raised on supplier audits, where audits of external major suppliers are planned but not yet conducted.</p>

CRITERION	RATING	COMMENT
2.5 Impact Assessments	Conformance	Impact Assessment on Environmental, Social, Health & Safety, Cultural and Human Rights is conducted by the Entity. Identified risks on social, environment, health & safety, and governance are assessed, and the associated control measures are established, and implemented. There has not been any new projects or major changes since the Entity became an ASI Member.
2.6 Emergency Response Plan	Minor Non-Conformance	The Entity has established and maintained Emergency and Contingency Response Plans, and its resumption plans. The established emergency response plans include collaboration with potentially affected stakeholder groups such as communities, workers in the Entity and in the in-house contractors. The workers and employees are provided with relevant emergency training courses, and emergency drills. However, one minor non-conformance is raised on emergency drill, where emergency evacuation drill was not conducted for canteen workers.
2.7 Mergers and Acquisitions	Conformance	The Entity has established a management procedure in case of Mergers and Acquisitions based on the requirement of ASI Performance Standard. No such activity has happened since the Entity became an ASI Member.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established a management procedure in case of Closure, Decommissioning and Divestment based on the requirement of ASI Performance Standard. No such activity has happened since the Entity became an ASI Member.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	An Annual Sustainability report is published, and it is publicly accessible at the Entity's premise (welcome center) and via the Novelis website: www.novelis.com/sustainability/
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with applicable law and regulations. There are no significant fines or penalties imposed on the Entity as reported in the Entity's Sustainability Report (Community and Social Section), and accessible at the Entity's welcome center for public communication.

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	The Entity's financial audit report verified by the external third party accounting firm, and financial results are disclosed at the Entity's website: http://investors.novelis.com/historical-results and the Government website http://dart.fss.or.kr/ Certificates of full national/local tax payment to Government are issued by Government agencies.
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	Internal complaint or grievance reporting mechanisms (hotline numbers, suggestion boxes, grievance handling council) have been established, and external complaints or whistle-blowing mechanisms (hotline numbers) are accessible through the Entity's website: www.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Environmental Life Cycle Assessments are conducted by the external third party for the Entity's products (Aluminium Can Body and Aluminium Can End). The Environmental Life Cycle Assessment reports are cradle-to-grave, and it is based on the ISO 14040:2006 Environmental management, Life cycle assessment, Principles and Framework Standard. Summary of the Environmental Life Cycle Assessment reports in Korean is accessible at the Entity's welcome center for public communication.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Environmental Life Cycle Assessment report can be provided upon request as stated in the Entity's Sustainability Report. There have been no requests to date.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Environmental Life Cycle Assessment Report is published in Korean, and it is accessible at the Entity's welcome center for public communication.
4.2 Product design	Conformance	The Entity integrates relevant objectives in the design and development process for products to enhance sustainability, including the environmental life cycle impacts of the products. The target for these relevant aspects is defined annually, and monitored monthly, and evaluated every year.
4.3a Aluminium Process Scrap (targets)	Conformance	Based on the Entity's Scrap Management Process, the process scrap within its own close-loop system

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		operations are collected from production facilities and recycled/reused without further packaging, or storage. The Entity has a target of 100% scrap for collection, recycling and/or re-use.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented the separation of Aluminium alloys and grades for recycling. The generated target for process scrap utilization rate is 100%.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	There is a commitment to increase recycling scrap in the Entity's production, which is stated in the Sustainability Platform Brochure (issued in 2021), and it is published at the Entity's website: https://www.novelis.com/wp-content/uploads/2021/04/Novelis-Sustainability-Platform-Brochure-Korean.pdf The Entity has established a recycling target of using scrap materials in the production, and targets are monitored every month.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	There is no local, or national collection and recycling system for Aluminium scraps in Korea. The Entity has its own recycling systems and plans to increase and implement accurate measurement of recycling rates for production of the Entity's products.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity is under Greenhouse Gas (GHG) Emission Trading Scheme regulated by the Government. Scope 1 and 2 GHG emissions and energy use by source are tracked, calculated, and documented. As legally bounded, GHG emission and Energy use are verified by the accredited third party annually. Results of GHG emission and Energy use in 2019 and 2020 are included in the Sustainability Report (Page 15 of Environment Section) which is available to the public at the Entity's premise (welcome center). Also, the Entity's GHG emission (281,214 tCO ₂ eq) and energy use (5,564 TJ) is disclosed at the public website of National Greenhouse Gas Inventory and Research Center operated by the Ministry of Environment: www.gir.go.kr
5.2 GHG emissions reductions	Conformance	The Entity set up GHG emission reduction targets (Scope 1 and 2) in 2021 based on the GHG emission level in 2020 aligning with the group target assigned. The associated management program/plans to achieve reduction target is established and implemented. GHG target is

CRITERION	RATING	COMMENT
		accessible at the Entity's Sustainability Report (Page 17 of Sustainability Goal Section) posted at the Entity's premise (welcome center).
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	Operation of air emission facilities are approved by the Government. The pollutants in the air emission are quantified in the Environmental Impact Assessment report. The waste air generated in the operation is collected and treated before emission to mitigate adverse impacts. Emissions meet the local emission limit and does not exceed the legal limit since initial operation of the Entity in October 1992.
6.2 Discharges to Water	Conformance	The Entity has operated wastewater treatment plants in the Entity's premise. The Entity has setup water reduction targets and plans to minimize adverse impacts. The amount of water use and wastewater discharge is accessible at the Entity's Sustainability Report (Under Sustainability Goal and Environment Sections) posted at the Entity's premise (welcome center).
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Based on the documented Environmental Impact Assessment Procedure, the Entity has conducted Environmental Impact Assessment and Off-site Risk Assessment where Spills and Leakage may contaminate air, water, and soil.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Following Environmental Impact Assessment and Off-site Risk Assessment, the Entity has established control plans to prevent the Spills and Leakage. The relevant training is provided to workers. The scope and responsibility for external communication (government agencies, communities, factory nearby) on spill/leakage is defined in the Crisis Response Plan and Emergency Management Procedure. Daily inspection of Spills of Leakage, and periodic Soil Test and Leakage Test are conducted.

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6.4a Reporting of Spills (immediate disclosure)	Conformance	The reporting of spill/leakage is defined in the management procedure of information disclosure. There is no reported case of Spills and Leakages for last three years.
6.4b Reporting of Spills (regular reporting)	Conformance	The impact assessments of the spill/leakage and remediation actions taken will be published in the Annual Sustainability Report. No reported case of Spills exists for the past three years, and its statement is disclosed at the Entity's Sustainability Report (Environment Section) posted at the Entity's premise (welcome center).
6.5a Waste management and reporting (strategy)	Conformance	A Waste Management Strategy according to the waste mitigation hierarchy is covered in the Entity's Sustainability Platform Brochure, and Environment Impact Assessment Procedure. Wastes (General and Hazardous) are transferred and disposed of by the qualified vendors, and waste reduction target is established by the Entity to minimize the negative impacts.
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	Yearly quantities of Hazardous and Non-Hazardous Waste are disclosed at the public website:" https://www.env-info.kr/ The quantities and method of disposal (Landfill / Recycling) are disclosed at the Entity's Annual Sustainability Report (Environment Section) posted at the Entity's premise (welcome center). However, one minor non-conformance relates to the public disclose of quantities of Hazardous and Non-Hazardous Waste.
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.

CRITERION	RATING	COMMENT
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 has established a Dross Handling Procedure. Dross from the Entity is sold (white dross) and subcontracted (black dross) to external processor for dross recovery, and recovered Aluminium is returned for recycling in the Entity. Recovery rate from the external dross processor is monitored every year, and encouragement of recovery from the dross is stated in the agreement with the external dross processor.
6.8b Dross (recycling)	Conformance	A review of alternative options to increase recycling of treated Dross so to reduce final landfill of dross residues has been undertaken with an external dross processor. The Entity, and external dross processor monitor quantities disposed to landfill and alternative options to reduce quantities disposed to landfill.
6.8c Dross (review of alternatives)	Conformance	The Entity holds an annual meeting with the external dross processor to increase recovery from dross, to find the alternative options of recycling so to reduce final quantity of dross landfill. The Entity has monitored quantities disposed to landfill every month to analyse quantities disposed to landfill.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's water sources are both underground water and municipal water. A water flow diagram including withdrawal and use by source and type is in place. The water balance analysis is monitored and controlled through the Entity's on-line monitoring system.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted water risk assessments. The Entity's operational, internal, and external risk in their area of influence are taken into

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		consideration in the water risk assessment. Due to the nature of the product, production processes, and the existing water management systems, the water-related risk is low in the local water environment.
7.2a Water management (management plans)	Conformance	The Entity's water consumption saving program is set, monitored, and controlled. There are no identified significant water-related risks in the Entity's Area of Influence.
7.2b Water management (monitoring)	Conformance	The Entity's water consumption saving program is set, monitored, and controlled. There are no identified significant water-related risks in the Entity's Area of Influence.
7.3 Disclosure of water usage and risks	Conformance	The water usage and risk related to water is accessible at the Entity's Sustainability Report (Page 10, 13 of Our Sustainability Section, and 15 of Environment Section) posted at the Entity's premise (welcome center).
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Based on the Entity's Environmental Impact Assessment (internal, external), Environmental Impact Assessment and Off-site Risk Assessment including biodiversity risks are conducted. The outcome of the risk assessments does not include any significant biodiversity impacts.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Based on the Entity's Environmental Impact Assessment (internal, external) and Off-site Risk Assessment including biodiversity risks are conducted. The outcome of the risk assessments does not include any significant biodiversity impacts.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Based on the Entity's Environmental Impact Assessment (internal, external) and Off-site Risk Assessment including biodiversity risks are conducted. The outcome of the risk assessments does not include any significant biodiversity impacts.
8.2c Biodiversity management (reporting)	Conformance	The biodiversity risk or impact by the operation of the Entity in its internal and external Area of Influence was assessed as low, and the outcome of the biodiversity risk assessment does not identify any significant biodiversity impacts. Outcomes of risk assessments are accessible at the Entity's

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		Sustainability Report posted at the Entity's premise (welcome center).
8.3 Alien Species	Conformance	Actions to prevent introduction of alien species are taken by the Entity. Packaging materials (wooden pallets) are processed in a way to avoid the introduction of alien species, and certificates of heat treatment and fumigation are received from suppliers.
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's commitment to Human Rights is committed via Novelis Code of Conduct, and it is accessible at the Entity's website: www.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf The Code of Conduct is communicated to all employees, and contractors in the Entity.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity is committed to respecting Human Rights. The due diligence process including identification and assessment of the potential risks for human rights-related issues is established and implemented. Compliance audits to the Entity and its in-house contractors are conducted to verify effectiveness of controls.
9.1c Human Rights Due Diligence (remediation)	Conformance	Risk assessment on Labor, Ethics, and Social aspects is conducted, and it includes remediation and control plans. The Entity has established and published complaint/grievance channel to stakeholders including workers, and communities.
9.2 Women's Rights	Conformance	The Entity is committed to respect Women's Rights. The strategy and actions on increase gender diversity are planned and reviewed. The legal requirements on Women's Rights including

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		maternity protection is identified, and addressed in the Entity's Employment Regulations, and Regulation on Maternity Protection. No complaints have been received on Women's Rights including gender discrimination from women workers.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no indigenous people within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no indigenous people within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Conformance	A review of the official government website of Land Use and Development Information Service: www.eum.go.kr confirmed there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This criterion is not applicable as there is no resettlement necessary in the Entity's Certification Scope.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion is not applicable as there is no resettlement necessary in the Entity's Certification Scope.
9.7a Local Communities (rights and interests)	Conformance	The Policy on respecting the legal and customary rights and interests of local communities is in place. The Entity has conducted relevant risk assessment, and addressed control plans accordingly.
9.7b Local Communities (impacts)	Conformance	The Entity has conducted a risk assessment on the local community's rights. A review of the results of the risk assessment, the adverse impact on the local communities by the Entity is limited.
9.7c Local Communities (livelihoods)	Conformance	Various activities including charity activities or support activities to the local communities are conducted by the Entity. Main activities of the Entity are addressed in the Sustainability Report (Our Sustainability Section), and it is accessible at the Entity's premise (welcome center).
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has established policies not to use the conflict mineral as addressed in the Entity's Conflict Mineral Declaration, Novelis Code of Conduct, and Novelis Trade Restrictions Compliance Policy. More information of Novelis Code of Conduct is accessible at the Entity's website:

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		www.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf A risk assessment on conflict minerals has been conducted, and no complaints on conflict minerals have been received to date.
9.9 Security practice	Conformance	Security services are outsourced and the security contractor has agreed to comply with the Entity's Supplier Code of Conduct. Direct/indirect body search including restriction of free movement is not engaged by the security. No grievance or complaint against security activities is received to date.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity is committed to respect of freedom of association. Labour union is formed and union representatives are elected by workers in an anonymous, direct, and secret way. Workers have a right to join or not to join the Labour Union.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity is committed to respect collective bargaining rights. Formal Collective Bargaining Agreement is made, and it is declared to the government.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	A labour union has been formed in the Entity. A Labour Management Council is also established. Grievances or complaints from workers are discussed with management representatives during meetings with the labour union or through Labour Management Council meetings.
10.2a Child Labour (minimum age)	Conformance	Child labour under 15 years old is prohibited. There is no history or no current use of child labour under 15 years old or young worker under 18 years old in the Entity.
10.2b Child Labour (hazardous)	Conformance	Child labour under 15 years old is prohibited. Young workers under 18 years old are under special protection as specified in the law and young workers are not allowed to work in hazardous working conditions. There is no child labour under 15 years old or young worker under 18 years old in the Entity.
10.2c Child Labour (worst forms)	Conformance	The Entity and Entity's contractors in the Entity's premise are committed to prohibit the use or support of Child Labour. There is no history or current use of Child Labour.

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10.3a Forced Labour (human trafficking)	Conformance	The Entity and Entity's contractors are committed to the prohibition of forced labour, slavery, and human trafficking. Any engagement or support of human trafficking was not identified.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity is committed to prohibition of forced labour as addressed in the Novelis Code of Conduct. Workers are not required to pay any form of deposit, savings, or recruitment fee.
10.3c Forced Labour (migrant workers)	Conformance	There are no foreign migrant workers present in the Entity, and contractors working in the Entity. All workers are Korean.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is committed to the prohibition of forced labour. In the labour contracts signed between the Entity and workers, no terms of debt bondage labour are found. There are no practices of debt bondage labour in the Entity.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity is not involved in any form of forced labour. There is no restriction of workers' freedom of movement at the Entity's premise.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity is not involved in any form of forced labour. Workers' original documents are not retained by the Entity and only copies of original documents are kept in workers' files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Workers can terminate the employment with a specific notice period in advance without any penalty. From review of the resignation documents, and workers interviews, workers can resign or be terminated without paying penalties.
10.4 Non-Discrimination	Conformance	The Entity is committed to non-discrimination. The Entity's hiring process, job advertisement, and job application template indicate the decisions are solely based on the candidate's ability to perform the job's requirements rather than other personal characteristics. Interviewed workers confirm no discriminations in the Entity. No case of grievances or complaints on discrimination is received to date.
10.5 Communication and engagement	Conformance	Workers can freely express their concerns or complaints regarding working conditions, resolution of workplace and compensation issues without threat of reprisal, intimidation, or harassment. Direct and periodic communication between the Entity and workers or workers' representatives is established and implemented.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	Prohibition of inhumane treatment is committed in the Entity's regulations. Disciplinary regulations and practices are in compliance with the legal requirements. Disciplinary register is established and maintained.
10.7a Remuneration (living wage)	Conformance	The wage structure is clearly defined, and the Entity's base wage meets or higher than legal minimum wage. The Entity pays to workers each 150% of the ordinary wage for overtime, night-time (22:00 to 06:00), and holiday work.
10.7b Remuneration (method of payment)	Conformance	All payment details are documented in the Entity's Wage List, and payments are timely paid directly to workers by cash through bank transfer on 25 th of each month. Monthly payment is made timely, and there has been no delay in payment to workers.
10.8 Working Time	Conformance	Regulations on working hours including holidays are addressed in the Entity's Employment Regulation and Collective Bargaining Agreement. Working hours are recorded by the Entity. Working hours are monitored and working hours can be verified by workers. Weekly working hours do not exceed legal limit.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	An Occupational Health and Safety Policy has been established and reviewed periodically and it is publicly communicated with workers and stakeholders. The policy is accessible at the Entity's website" www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The scope of Occupational Health and Safety policy is applied to all workers, and visitors, and their controls are under the Entity's Occupational Health & Safety Management System. Workers and visitors are communicated or trained on specific hazards and risks.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Occupational Health and Safety policy includes commitment to comply with the legal requirements and other requirements. Management system to identify all applicable legal requirements and other requirements, and to evaluate legal compliance is established, and implemented.

CRITERION	RATING	COMMENT
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	A workers right to refuse unsafe work is committed to by the Entity. Workers are provided with handbook and training courses to understand the hazards, health and safety associated risks and actions determined that are relevant to them and right to refuse the unsafe work.
11.2 OH&S Management System	Conformance	The Entity has implemented a documented Occupational Health and Safety Management system and the Entity holds valid ISO 45001:2018 Certificate.
11.3 Employee engagement on health and safety	Conformance	The Entity has established a documented procedure of workers' consultation and participation in health and safety. Periodic health and safety committee meetings in the Entity and with the in-house contractors are conducted. Workers are encouraged to report their near-miss, concerns or advice on health and safety issues to the Entity's Near-Miss Reporting system, and further review and actions are made by the Entity.
11.4 OH&S performance	Conformance	An Occupational Health and Safety Management system is established and managed. Annual objectives using leading and lagging indicators are set, monitored, and evaluated.

Document Control and Version History

Revision	Date	Notes
0	21 June 2021	Initial Certification Audit – Full Certification