
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NOVELIS BRAZIL - PINDAMONHANGABA

CERTIFICATE
NUMBER

152

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

16 SEPTEMBER 2021

DATE OF EXPIRY

15 SEPTEMBER 2024

CERTIFIED SINCE

16 SEPTEMBER 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

All activities on the Pindamonhangaba site (Brazil)
for the production of flat rolled aluminium.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Brazil - Pindamonhangaba
CERTIFICATION SCOPE	All activities on the Pindamonhangaba site (Brazil) for the production of flat rolled aluminium.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation)Other manufacturing or sale of products containing Aluminium
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">26 – 30 July 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">18 August 2021
AUDIT SCOPE	<p>The audit scope includes all activities at the Novelis facility in the city of Pindamonhangaba (Brazil), for the production of flat rolled aluminium.</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)Other manufacturing or sale of products containing Aluminium <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

16 September 2021 – 15 September 2024

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

15 September 2024

CERTIFICATE
NUMBER

152

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented an adequate system to monitor and comply with applicable legal requirements through the use of the Environmental Lema Platform and that the company Consultoria CVM Consultoria e Formação was hired to assess compliance with legal requirements.</p> <p>For more information: https://pt-br.novelis.com/wp-content/uploads/2020/10/Folder_Programa-de-Integridade.pdf</p>
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms, including Extortion and Bribery, in accordance with Applicable Law and current international standards.</p> <p>For more information: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-do-Canal-de-Denu%CC%81ncias.pdf and https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-Anticorrupt%CC%A7a%CC%83o.pdf and https://pt-br.novelis.com/wp-content/uploads/2020/10/Folder_Programa-de-Integridade.pdf</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct, including relevant principles for environmental, social and governance performance.</p> <p>For more information: https://pt-br.novelis.com/wp-content/uploads/2020/10/Novelis-Code-of-Conduct_Sep-2014_Final_POR.pdf and https://pt-br.novelis.com/wp-content/uploads/2020/10/Folder_Programa-de-Integridade.pdf</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has implemented Policies consistent with environmental, social and governance practices.</p> <p>For more information: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf and https://pt-br.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf and</p>

CRITERION	RATING	COMMENT
		https://pt-br.novelis.com/wp-content/uploads/2021/07/Poli%CC%81tica-Responsabilidade-Social-NSA.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity uses a system to control documents, it was observed that senior management endorses and supports through the provision of resources and periodic reviews of the policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity publicly discloses the Policies consistent with environmental, social and governance practices on the website:</p> <p>https://pt-br.novelis.com</p> <p>For more information:</p> <p>https://pt-br.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf and</p> <p>https://pt-br.novelis.com/wp-content/uploads/2021/07/Poli%CC%81tica-Responsabilidade-Social-NSA.pdf</p>
2.2 Leadership	Conformance	The Entity has appointed the Quality Manager as the representative of the Senior Management with general responsibility and authority to ensure compliance with the requirements of the Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity is Certified to the ISO 14001:2015 Standard, valid until December 2022.</p> <p>For more information:</p> <p>https://pt-br.novelis.com/wp-content/uploads/2020/05/ECert-14001-Ingles%CC%82s.pdf</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has defined and documented the Social Management System in the Social Responsibility Policy. For more information:</p> <p>https://pt-br.novelis.com/wp-content/uploads/2021/07/Poli%CC%81tica-Responsabilidade-Social-NSA.pdf</p>
2.4 Responsible Sourcing	Conformance	The Novelis Integrity Program has as its principles the prevention, detection and correction of any situations and/or behaviours that violate or are suspected of violating company policies and current laws. For the Integrity Program to ensure a Responsible Purchasing Policy, Novelis has established a number of initiatives in Anti-Corruption, Competition, Human Rights, Gifts and Entertainment, Conflict of Interest, Whistleblower Channel, Third Party Relations and Social Responsibility Policies, which are applicable to both

CRITERION	RATING	COMMENT
		employees and their suppliers. The reporting channels are publicly disclosed in the 2021 Sustainability Report page 14: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Annual-FY21.pdf
2.5 Impact Assessments	Conformance	The Entity completed an impact assessment undertaken by the Ramboll company in March 2021, taking into account the environmental, social, cultural, human rights and gender analysis for new projects and changes to existing facilities. The Entity developed a Change Management Procedure to manage the stages of Impact Assessment assessments.
2.6 Emergency Response Plan	Conformance	The Entity prepared 36 Emergency Response Plans specific to the location developed in collaboration with potentially affected stakeholder groups and was tested in simulated as defined in the Emergency Simulation Schedule.
2.7 Mergers and Acquisitions	Conformance	The Entity has developed and implemented the Change Management procedure for Acquisitions and Mergers processes, however the Entity does not have any such processes in progress currently.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has developed and implemented the Change Management procedure for Closure, Decommissioning and Divestment processes, however the Entity does not have any such processes in progress currently.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity makes publicly available its approach on governance, environmental, social and economic impacts in the Annual Report - South America 2021. For more information: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity has publicly disclosed information on fines, judgments, penalties and sanctions, through the Annual Report - South America 2021, page 15. For more information: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	All payments are made only in the name of the Entity, being audited by the company PWC (PriceWaterhouseCoopers), showing the payment flow to the financial, Clearance Certificates of Federal, State and Municipal Debts.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and gender-sensitive and culturally sensitive grievance resolving mechanisms, suitable for dealing with complaints. Complaints and requests for information from interested parties related to its operations in the Whistleblower Channel Policy. Professionals: Novelis Ethics Hotline - Telephone: 0800-892-1819 E-mail: voxnovelis@linhaetica.com.br Telephone: 0800-200-7170 Website: www.linhaetica.com.br/etica/voxnovelis
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	In the Integrated System Management Manual, the entire assessment of the impacts of the life cycle of its main production lines of Novelis Pindamonhangaba was reviewed. The Sustainability Report on page 30 addresses the Life Cycle Analysis, correlated to the most significant environmental aspects. Refer: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	When requested by the customer, Annex I of the Integrated System Management Manual - Integrated System Management Manual is provided, which provides the Life Cycle Assessment (LCA) of Novelis Pindamonhangaba. The development of a Life Cycle Assessment (LCA) and/or carbon footprint study for an aluminium product produced in Pindamonhangaba was sighted.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	When requested by the customer, Annex I of the Integrated System Management Manual - Integrated System Management Manual is provided, which provides the Life Cycle Assessment (LCA) of Novelis Pindamonhangaba. In addition, the Sustainability Report addresses the Life Cycle Assessment (LCA) on page 30, through the link:

CRITERION	RATING	COMMENT
		https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
4.2 Product design	Conformance	<p>The Entity integrates clear objectives in the product design and development process to increase sustainability, including the impacts of the final product's environmental life cycle.</p> <p>For more information: https://pt-br.novelis.com/sustainability/ and https://pt-br.novelis.com/wp-content/uploads/2020/04/Purpose-Report-FY19-web.pdf</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>Scrap generated in both hot and cold rolling and laboratory samples is 100% reused in the remelt furnace.</p> <p>The RAS (Run Around Scrap) flow was sighted, where it is possible to identify the scrap collection points of each process and the forwarding of this scrap to the service provider LATASA Indústria e Comércio Ltda, which manages to recover 55%. Actions are implemented in all lines to reduce the generation of drains to improve the metal efficiency target.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>Separation by types of alloy of the scraps generated in each process is undertaken with identification of labels and twenty daily analyses with a spectrometer so that there is no error in the use of this scrap in remelting furnaces to produce the appropriate material for each type of customer product.</p> <p>Consumption originated in Remelting (primary metal), Molten (recycling + liquid metal from the service provider LATASA Indústria e Comércio Ltda), secondary ingot and Aluminum Retail (factory) were evidenced.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>It was evidenced that in Fiscal Year 21 the recycling target was 79.5%, for Fiscal Year 22 it is 76% and it is under study for Fiscal Year 24 to have 78.7%. A corporate environmental footprint target of a 4% increase in recycled content has been developed.</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>Novelis has a Collection Center to collect aluminium scrap. The Collection Center collects aluminium cans in various regions of Brazil and encourages small, medium and large suppliers. There are 38 Collection Centers (14 from Novelis and 24 from the service provider LATASA Indústria e Comércio Ltda) that</p>

CRITERION	RATING	COMMENT
		<p>collect aluminium can scrap for supply to the Pindamonhangaba plant.</p> <p>The strategy has been in place since 2021 to create more partnerships to obtain aluminium can scrap. A Recycling and Sustainability agreement with two Associations (ABAL and ABRALATAS) was sighted in compliance with the Term of Commitment for Reverse Logistics of Aluminum Cans for Drinks and signed with the Ministry of Environment.</p> <p>Planning of the Collection Center where they collect aluminium cans was presented, where Fiscal Year 21 had a 63.7% market share and for Fiscal Year 22 the target is 63.5%, with a strategic vision until Fiscal Year 36 with a target 70% market share from 2032.</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The material emissions of Greenhouse Gases (GHG) are represented in the Energy Matrix Mapping described in the 2021 Sustainability report on page 21 via:</p> <p>https://app.sync.sajan.com/el/site/res/jcwegcbo_lu2att1D35qfaufp/2021-%2007-23_Report%CC%81rio-Anual-FY21.pdf</p>
5.2 GHG emissions reductions	Conformance	<p>GHG emission reduction targets for 2021 is 2% compared to 2020. Novelis developed its GHG emissions plan, aiming to reduce by 30% by 2026 and neutralize by 2050.</p> <p>In recent years (period between 2017 and 2020), the unit has reduced total emissions in CO2 equivalent in Scope 1 by 14% and by 31% in Scope 2. Energy Matrix Mapping is in the sustainability report via:</p> <p>https://app.sync.sajan.com/el/site/res/jcwegcbo_lu2att1D35qfaufp/2021-%2007-23_Report%CC%81rio-Anual-FY21.pdf</p> <p>Optimization plans were issued for Fiscal Year 22, where 36 Projects were identified to be leveraged to contribute to a 6% reduction by 2024 and by 2026 to reduce 10%, with a forecast reduction of 110,877 MWh in 3 years.</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>An analysis of atmospheric emissions is carried out in accordance with documented procedures as part of the Environmental Monitoring Plan and Black Smoke Control, which addresses the use of the Ringheltmann scale for fixed and mobile sources. Other Fixed Sources (30 chimney structures) have analysis of Particulate Material, Nitrogen Dioxide, Sulfur Dioxide and Volatile Organic Compounds, which are measured within the validity period of the Environmental Operational License No. 3006276, Results are within the specified limits is registered in the Chimney Atmospheric Emission Analysis Report No. 3527/19.</p> <p>In July 2021 measurement commenced of all emissions from the 36 chimney structures and from October 2021 eight more chimney structures will be added to this monitoring program.</p>
6.2 Discharges to Water	Conformance	<p>Domestic effluent is discharged into the public system of the State of São Paulo (SABESP). A complete analysis is carried out every six months in accordance with documented Procedure Environmental Monitoring Plan.</p> <p>There are daily analysis of the Industrial Effluent Treatment Station (ETE) and for rainwater in the physical-chemical laboratories of the manufacturing unit.</p> <p>The Industrial Effluent Treatment Station (ETE) complies with the Legislation of State Law 8468 Article 19 A.</p> <p>The Stormwater Gallery Wastewater Analysis is carried out every six months in accordance with State Law 8468 Article 18 and CONAMA 430 Article 16.</p> <p>The Daily Process Control Worksheet of the Industrial and Domestic Effluent Treatment Station (ETE) was sighted, with all parameters measured and monitored, within the legal specification of the State Law Decree 8468.</p> <p>Rainwater entering channels is directed to the treatment plant from the containment boxes.</p> <p>The report of the amount of volume generated daily was highlighted. The months from January to March 2021 were highlighted within the specified parameters.</p> <p>The Water Balance of the Pinda Fiscal Year 21 Plant states the discharge of treated water in the amount was 22,387 m³/month (SABESP's public system).</p>

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Sustainability Report on page 31 https://app.sync.sajan.com/el/site/res/jcwegcbo_lu2att1D35qfaufp/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf confirmed an analysis on the management and prevention of spillage and leakage situations within the Entity's perimeter.</p> <p>There was a decontamination process within the manufacturing perimeter with the Environmental Agency (CETESB), which through CETESB letter No. 188/2019-CMT of May 23, 2019 declares that the Area Decontamination Process close to the Hot Mill and Cold rolling mill can be closed and areas classified as rehabilitated for industrial use.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>For environmental monitoring, Novelis has a contaminated area management procedure, which includes confirmatory investigation, risk analysis and adequate remediation for risk cases, with no related occurrence or object of action having occurred in Fiscal Year 21.</p> <p>Through the Environmental Aspects and Impacts Survey Worksheet, it is possible to demonstrate the degree of operational risk for both leakage and spillage.</p> <p>Through the Senior Management Risk Analysis Worksheet, the classification as Substantial Risk was evidenced, the possibility of leakage and spillage, and as a consequence, only compliance with operating and maintenance procedures is sufficient to avoid such occurrences.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Novelis Global EHS Incident Performance and Management Standard requires large leaks are assessed in accordance to the corporate criteria for classification as a Type 1 incident (significant environmental event, where there is an emission to the environment resulting in danger or damage to life wildlife, natural habitat or neighbouring community, either temporarily or permanently).</p> <p>There were no significant incidents of large leaks (Type 1) in recent years, including in Fiscal Year 21 they had zero occurrences.</p> <p>Small occurrences of leaks (below 20 litres) reported through the Fiscal Year 22 Occurrence Reporting History (as of April) were evidenced, where there were only 12 occurrences of oil leakage up to 10 litres and 12 occurrences of water leakage in the process (inside the plant) with no impact associated. These occurrences are remedied with corrective and preventive</p>

CRITERION	RATING	COMMENT
		maintenance interventions through the electronic tool EAM Oracle and these matters are discussed in sub-committees at each production area.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity annually publishes the Impact Assessments of the Spills in the Sustainability Report on page 32: https://app.sync.sajan.com/_el/site/res/jcwegcbo_lu2att1D35qfaufp/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
6.5a Waste management and reporting (strategy)	Conformance	Novelis has mapped waste collectors with 'ecopoints'. The associated goal is to reduce the waste sent to landfill. No Class I hazardous waste is sent to landfill. Several initiatives were implemented which resulted in achieving 97% of recycled and/or co-processing waste and only 3% of waste sent to industrial landfill, which is classified as non-hazardous waste. All processes were surveyed and 34 waste streams were mapped, where they can be reduced, reused, recycled, treated and disposed of. As of Fiscal Year 20, the Entity's goal is to reduce the sending of waste to landfill by 20% by FY2026.
6.5b Waste management and reporting (disclosure)	Conformance	Novelis makes the Annual Declaration of Solid Waste to be sending to CETESB. The Declaration addresses all types of hazardous and non-hazardous waste with the amount generated in 2020. For hazardous waste, a respective CADRI (Certificate of Handling Waste of Environmental Interest) is generated. The Sustainability Report reports Novelis' waste generation levels on page 5 and 25 via: https://app.sync.sajan.com/_el/site/res/jcwegcbo_lu2att1D35qfaufp/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
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.

CRITERION	RATING	COMMENT
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity maximizes the recovery of Aluminium through the treatment of slag and slag waste, being sent to a qualified supplier, which has the slag recovery operation using up to 60% of the material sent, it is returned to Novelis as RSI – Raw Secondary Ingots.
6.8b Dross (recycling)	Conformance	The Entity maximizes the recovery of Aluminium through the treatment of slag and slag waste, being sent to a qualified supplier, which has the slag recovery operation using up to 60% of the material sent, it is returned to Entity as RSI – Raw Secondary Ingots.
6.8c Dross (review of alternatives)	Conformance	The Entity regularly reviews the options and alternatives for slag waste landfill, being currently sent to a qualified supplier, which has the slag recovery operation with use of up to 60% of the material sent, it is returned to the Entity as RSI – Raw Secondary Ingots.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Novelis manages the water balance, receiving water from the Rio Preto Dam (a tributary of the Ribeirão Capituba), from three artesian wells and treated water from the Public System of the State of São Paulo (SABESP). The monthly Water Consumption Management, according to the values allowed in the grants, demonstrates a consumption below the value that

CRITERION	RATING	COMMENT
		<p>was authorized by the local authority. It also includes the volume of water reused via the reverse osmosis system.</p> <p>Reused water (Backwash of the Sand Filter and rainwater collection - backwash water filter and rain water reuse) is used throughout the Entity. The reuse of water output from the reverse osmosis to the cooling tower and the condensate water from the compressors.</p>
7.1b Water assessment (risk assessment)	Conformance	<p>Novelis has undertaken studies with the ECO Foundation where they identified the various threats to life in Rio Preto microbasin.</p> <p>The Materiality Matrix, contained in the Sustainability report page 15 incorporates this risk assessment:</p> <p>https://app.sync.sajan.com/el/site/res/jcwegcbo_lu2att1D35qfaufp/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf</p> <p>A study was completed in 2021 considering public data mainly from CEIVAP - Committee for Integration of the Paraiba do Sul River Watershed: http://www.ceivap.org.br</p> <p>A risk matrix was sighted for this study on the consumption of subterranean water and surface water, with changes in the quality of ground and surface water and quality of the ETE leaving water and quantity of abstraction identified as significant environmental impacts.</p>
7.2a Water management (management plans)	Conformance	<p>On pages 18 to 20 of the Sustainability Report https://app.sync.sajan.com/el/site/res/jcwegcbo_lu2att1D35qfaufp/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf</p> <p>a study is referred to that was completed in 2021 which assessed public data from CEIVAP - Committee for Integration of the Paraiba do Sul River Basin: http://www.ceivap.org.br</p> <p>An Action Plan was sighted with a defined deadline and those responsible for mitigation actions until January 2022, originating from the Risk Matrix. For Fiscal Year 22 there is the environmental objective of reducing the specific water consumption to 295 litres/tonne of standardized aluminium.</p>
7.2b Water management (monitoring)	Conformance	<p>An Action Plan was sighted with a defined deadline and those responsible for mitigation actions until January 2022, originating from the Corporate Risk Matrix. For Fiscal Year 22 there is the environmental objective of reducing the specific</p>

CRITERION	RATING	COMMENT
		water consumption to 295 litres/tonne of standardized aluminium (total aluminium produced in each stage of the process produced).
7.3 Disclosure of water usage and risks	Conformance	<p>On pages 19 of the Sustainability Report reports the annual consumption with 948.09 megalitres, from SABESP's underground, surface and public network:</p> <p>https://app.sync.sajan.com/el/site/res/jcwegcbo_lu2att1D35qfaufp/2021-07-23_Relato%CC%81rio-Annual-FY21.pdf</p> <p>The Water Balance Map is presented with water consumption throughout the plant.</p> <p>In a study prepared by Ramboll (a consulting company) and in the Senior Management Risk Matrix, the material risks related to water and the actions to mitigate the risks that were considered substantial are presented.</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>A Biodiversity Action Plan (BAP) has been developed to serve the following purposes: Prevent or mitigate biodiversity loss, contribute to the remediation of significant biodiversity loss; identify the business opportunities arising from biodiversity management; respect the mitigation hierarchy; address any biodiversity risks identified through environmental and social impact assessments (ESIA); and, respond to regulatory requirements.</p> <p>Biodiversity Objectives are developed to define actions necessary to preserve / increase the value of biodiversity and ecosystem services and increase the outcome of the specified actions. In this study, it is considered the National Policy for Biodiversity.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>Using the Ramboll study, Novelis developed its Fiscal Year 22 Action Matrix - Fiscal Year 23, addressing the 10 actions recommended by Ramboll with a deadline until December 2022.</p> <p>The Entity has determined to undertake a new biodiversity study to assess the evolution of actions, according to the Environmental Monitoring Plan, which requires an annual survey to be completed.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The identification of conservation actions were included in the Ramboll study, seeking to comply with the foundations of the mitigation hierarchy (avoid, minimize, restore and compensate).</p>

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Conformance	Information on the Biodiversity Action Plan is presented in the Sustainability Report on pages 26 and 29. https://app.sync.sajan.com/el/site/res/jcwegcbo_lu2att1D35qfaufp/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
8.3 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of alien species that may have significant adverse impacts on biodiversity during the works to expand its facilities. For more information, access the Annual Report - South America 2021 at: https://app.sync.sajan.com/el/site/res/jcwegcbo_lu2att1D35qfaufp/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
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 respects and supports individual and collective human rights affected by its operations, being evidenced the commitment to assess, prevent and remedy potential adverse impacts on human rights in a way that is consistent with international instruments on human rights in the Policy Human Rights and Social Responsibility Policy. https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf and https://pt-br.novelis.com/wp-content/uploads/2021/07/Poli%CC%81tica-Responsabilidade-Social-NSA.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity commissioned a Due Diligence assessment by the Ramboll company in March 2021, taking into account the analyses of human rights seeking to identify, prevent, mitigate and

CRITERION	RATING	COMMENT
		<p>account for their actual and potential impacts on human rights.</p> <p>There were no human rights impacts identified in the area of influence of the Entity.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity commissioned a Due Diligence assessment by the Ramboll company in March 2021, taking into account the analyses of human rights seeking to identify, prevent, mitigate and account for their actual and potential impacts on human rights.</p> <p>There were no human rights impacts identified in the area of influence of the Entity.</p> <p>For more information access the Annual Report - South America 2021 (pages 14-15 and 35-38) at: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf</p>
9.2 Women's Rights	Conformance	<p>The Entity has developed and implemented the Human Rights Policy, guaranteeing respect for the rights and interests of women, preventing all forms of discrimination against women.</p> <p>The Entity has detailed in its Annual Report - South America, its commitment to increase the participation of women in Monthly Professional positions in 50% of new hires in junior positions and for Hourly Professionals in 33% of new hires in entry positions.</p> <p>The Entity had an increase in female leadership in 2020 by 28%. For more information, consult the Annual Report - South America 2021, pages 6 to 8 at: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf</p>
9.3 Indigenous Peoples	Conformance	<p>The Entity has implemented the Human Rights Policy guaranteeing respect for Human Rights, including the interest of Indigenous Peoples.</p> <p>For more information: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>The Entity commissioned a Due Diligence assessment by the Ramboll company in March 2021, taking into account the environmental, social, cultural, human rights, gender analysis, for new projects and changes to existing facilities.</p>

CRITERION	RATING	COMMENT
		<p>The Entity developed and implemented the Change Management Procedure to develop the stages of Impact Assessment assessments.</p> <p>For more information access the Annual Report - South America 2021 (pages 14-15 and 25-38) at: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has defined in its ASI Manual the commitment, if values that are considered as cultural and sacred heritage within the Entity's area of influence are identified, taking appropriate measures to ensure the conservation and preservation of the values identified in the Communities and in the Areas of Entity Influence.</p>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity commissioned a Due Diligence assessment by the Ramboll company in March 2021, taking into account the environmental, social, cultural, human rights, gender analysis, for new projects and changes to existing facilities.</p> <p>The Entity developed and implemented the Change Management Procedure to develop the stages of Impact Assessment assessments.</p> <p>For more information access the Annual Report - South America 2021 (pages 14-15 and 35-38) at: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>The Entity commissioned a Due Diligence assessment by the Ramboll company in March 2021, taking into account the environmental, social, cultural, human rights, gender analysis, for new projects and changes to existing facilities.</p> <p>The Entity developed and implemented the Change Management Procedure to develop the stages of Impact Assessment assessments.</p> <p>For more information access the Annual Report - South America 2021 (pages 14-15 and 35-38) at: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity respects the Legal Rights and Interests of local Communities through the development of the Social Responsibility Policy, the Social Impact Assessment Report and through the Disclosure of the Annual Report - South America 2021</p>

CRITERION	RATING	COMMENT
		For more information, access the Annual Report - South America, page 13 at: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
9.7b Local Communities (impacts)	Conformance	The Entity respects the Legal Rights and Interests of local Communities through the development of the Social Responsibility Policy, the Social Impact Assessment Report and through the Disclosure of the Annual Report - South America 2021 For more information, access the Annual Report - South America, page 13 at: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
9.7c Local Communities (livelihoods)	Conformance	The Entity respects and supports individual and collective human rights affected by its operations, being evidenced the commitment to assess, prevent and remedy potential adverse impacts on human rights in a way that is consistent with international instruments on Human Rights in the Policy Human Rights and Social Responsibility Policy. https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf and https://pt-br.novelis.com/wp-content/uploads/2021/07/Poli%CC%81tica-Responsabilidade-Social-NSA.pdf
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity does not contribute to armed conflicts or human rights abuses in conflict-affected and high-risk areas. For more information: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf and the Annual Report - South America 2021 (pages 14-15 and 35-38) at: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
9.9 Security practice	Conformance	The Entity has developed and implemented private property security protocols, respecting the human rights of employees.

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the Rights of Workers to freely associate with the Union since the hiring of Workers. For more information: https://data.smetal.org.br/file/2020/10/19/H131614-F00006-R668.pdf
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the Rights of Workers to freely associate with the Union since the hiring of Workers. For more information: https://data.smetal.org.br/file/2020/10/19/H131614-F00006-R668.pdf
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This is not applicable for the Entity as it has Union Agreements. For more information: https://data.smetal.org.br/file/2020/10/19/H131614-F00006-R668.pdf
10.2a Child Labour (minimum age)	Conformance	The Entity does not tolerate the use of Child Labour directly or indirectly at any stage of its production and/or administrative process. For more information access the Human Rights Policy (page 4) at: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf
10.2b Child Labour (hazardous)	Conformance	The Entity does not tolerate the use of Child Labour directly or indirectly at any stage of its production and/or administrative process. For more information access the Human Rights Policy (page 4) at: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf
10.2c Child Labour (worst forms)	Conformance	The Entity does not tolerate the use of Child Labour directly or indirectly at any stage of its production and/or administrative process. For more information access the Human Rights Policy (page 4) at: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not engage in or support trafficking in persons directly or through any employment or recruitment agency, which has been highlighted through campaigns and initiatives to publicise the Human Rights Policy and Integrity System. For more information, access the Human Rights Policy (page 4) at: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf

CRITERION	RATING	COMMENT
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity does not require any form of deposit or recruitment fee for hiring workers directly or indirectly at any stage of its production and/or administrative process. For more information access the Human Rights Policy at: https://pt-br.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf and the Code of Conduct at: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity does not require any form of deposit or recruitment fee for hiring workers directly or indirectly at any stage of its production and/or administrative process. For more information access the Human Rights Policy at: https://pt-br.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf and the Code of Conduct at: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>The Entity does not require any form of deposit or recruitment fee for hiring workers directly or indirectly at any stage of its production and/or administrative process. For more information access the Human Rights Policy at: https://pt-br.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf and the Code of Conduct at: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf</p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>The Entity does not unjustifiably restrict the freedom of movement of Workers in the workplace or require any form of deposit or recruitment fee for hiring workers directly or indirectly at any stage of its productive and/or administrative process. For more information, access the Human Rights Policy at: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf and the Code of Conduct at: https://pt-br.novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf</p>

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not keep original identity documents, travel documents or worker training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny Workers the freedom to terminate their employment contract at any time, without penalty, upon notice within a reasonable period or defined in the employment contract.
10.4 Non-Discrimination	Conformance	The Entity guarantees equal opportunities and does not engage or support Discrimination in the hiring, salary, promotion, training, promotion opportunities or termination of any Employee based on gender, race, national or social origin, religion, disability, affiliation politics, sexual orientation, marital status, family responsibilities, age or any other condition that may give rise to discrimination. For more information: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf and https://pt-br.novelis.com/about-us/community-outreach/
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct involvement with Workers and their representatives in relation to working conditions and resolution of work issues and compensation, without threat of reprisal, intimidation or harassment. For more information: https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-do-Canal-de-Denu%CC%81ncias.pdf and https://pt-br.novelis.com/wp-content/uploads/2020/10/Poli%CC%81tica-de-Direitos-Humanos.pdf
10.6 Disciplinary practices	Conformance	The Entity does not engage in and does not tolerate the use of corporal punishment, mental or physical coercion, harassment and gender violence, including sexual harassment or verbal abuse of workers.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to a decent minimum wage and guaranteed the wages paid for a monthly working day, in accordance with the Collective Union Convention. For more information: https://data.smetal.org.br/file/2020/10/19/H131614-F00006-R668.pdf

CRITERION	RATING	COMMENT
10.7b Remuneration (method of payment)	Conformance	The Entity respects the rights of workers to a decent minimum wage and guarantees that the wages paid for a monthly working day, in accordance with the Collective Union Convention. For more information: https://data.smetal.org.br/file/2020/10/19/H131614-F00006-R668.pdf
10.8 Working Time	Conformance	Evidenced that the Entity respects the rights of workers to an adequate weekly working hours, as agreed in the Collective Trade Union Convention. For more information: https://data.smetal.org.br/file/2020/10/19/H131614-F00006-R668.pdf
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has prepared an Occupational Health and Safety Policy, endorsed by Senior Management. For more information: https://pt-br.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 Occupational Health and Safety Policy is available via communication boards located in several areas for the knowledge of direct employees, contractors and visitors. For more information: https://pt-br.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf and https://pt-br.novelis.com/certifications/
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Occupational Health and Safety Policy includes the commitment to comply with the Applicable Legislation on Workers' Health and Safety, international standards and Conventions of the International Labor Organization (ILO). For more information: https://pt-br.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf and https://pt-br.novelis.com/certifications/
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The company has developed several safety tools, including the "Duty of Refusal" tool in which Workers have a duty to understand the dangers and safe practices of their work and the authority to refuse or stop unsafe work.

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The Entity has an Occupational Health and Safety Management System certified in ISO 18001 in accordance with National and International Standards. For more information: https://pt-br.novelis.com/certifications/ and https://pt-br.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
11.3 Employee engagement on health and safety	Conformance	The Entity provides workers with an Internal Accident Safety Committee, so that they can raise, discuss and participate in the resolution of Occupational Health and Safety issues. For more information access the Annual Report - South America 2021 (Pages 11 and 12) at: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf
11.4 OH&S performance	Conformance	The Entity evaluates its performance in Health and Occupational Safety with the commitment to provide safe conditions for employees through Absolute Safety, being broken down into seven risks. For more information, access the Annual Report - South America 2021 (Pages 11 and 12) at: https://pt-br.novelis.com/wp-content/uploads/2021/07/2021-07-23_Relato%CC%81rio-Anual-FY21.pdf

Document Control and Version History

Revision	Date	Notes
0	16 September 2021	Initial Certification Audit – Full Certification