
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NOVELIS (VOERDE)

CERTIFICATE
NUMBER

146

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

SZI GmbH

DATE OF ISSUE

31 AUGUST 2021

DATE OF EXPIRY

30 AUGUST 2021

CERTIFIED SINCE

31 AUGUST 2021

AUTHORISED BY

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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 Voerde (Germany) casthouse site to produce aluminium products including melting and casting.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

| | |
|-------------------------|--|
| MEMBER NAME | Novelis Inc. |
| ENTITY NAME | Novelis (Voerde) |
| CERTIFICATION SCOPE | All activities on the Voerde (Germany) casthouse site to produce aluminium products including 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">Initial Certification Audit |
| AUDIT FIRM | SZI GmbH |
| AUDIT DATE | <ul style="list-style-type: none">30 – 31 March 2021 |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">7 July 2021 |
| AUDIT SCOPE | <p>The audit scope includes all activities on the Voerde (Germany) casthouse site to produce aluminium products including 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 (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 and webcam footage of specific controls related to high risk activities.</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 August 2021 – 30 August 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

28 February 2022

CERTIFICATE
NUMBER

146

SUMMARY OF FINDINGS

| CRITERION | RATING | COMMENT |
|--|-------------|--|
| PRINCIPLE 1 BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | 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, ISO 50001 and ISO 9001 certifications from an accredited certification body. Corporate supports the site with legal counsel. |
| 1.2 Anti-Corruption | Conformance | 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. |
| 1.3 Code of Conduct | Conformance | 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/2020/07/Code-of-Conduct.pdf The Supplier Code of Conduct is available via: https://www.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-ENG-04292021.pdf |
| PRINCIPLE 2 POLICY & MANAGEMENT | | |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | The Novelis Group Environment, Health, Safety and Quality (EHSQ) 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 |
| 2.1b Environmental, Social, and Governance Policy (senior management) | Conformance | In accordance with the ASI Performance Standard as well as the Novelis EHSQ Policy, the Entity has senior management endorsement and support through provision of resources and regularly review |

| CRITERION | RATING | COMMENT |
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| | | the policies. The Entity obtained ISO 14001 and ISO 50001 certifications which are consistent with their ASI Certification Scope. |
| 2.1c Environmental, Social, and Governance Policy (communication) | Conformance | 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: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf |
| 2.2 Leadership | Conformance | The Novelis CEO has corporate responsibility and authority to ensure conformance with the ASI Performance Standard. On regional and local level, senior Management Representatives have been appointed for having overall responsibility and authority to ensure conformance with ASI Performance Standard. |
| 2.3a Environmental and Social Management Systems (environmental) | Conformance | The Entity has documented and implemented both an Environmental Management System according to ISO 14001 and Energy Management System according to ISO 50001. The management system is certified by an accredited certification body. |
| 2.3b Environmental and Social Management Systems (social) | Conformance | 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). |
| 2.4 Responsible Sourcing | 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 2.4 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. |
| 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 (Germany), where relevant projects and changes (linked to construction activities) must undergo a |

| CRITERION | RATING | COMMENT |
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| | | thorough analysis and authorization process (including Human Rights) and 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 such as community and authority are involved. There are regular drills together with the plant fire brigade, 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 still part of the latest Aleris sustainability reporting. However, Aleris group publicly disclosed its governance approach and its material environmental, social and economic impacts in the Group Sustainability Report. Due to the recent transfer of Entity ownership, the validity of the now redundant web domain has resulted in an expired certificate for the domain and as such the Aleris Sustainability Report cannot be viewed safely and is identified by various web browsers as a potential security risk to the viewer. Therefore this information is not readily accessible to the public. |
| 3.2 Non-compliance and liabilities | Conformance | The Entity is part of the Aleris Sustainability Reporting (to 2020). In future they will be included in the Novelis sustainability reporting. Entity specific information on significant fines, judgments, penalties and non-monetary sanctions are published by the district government (SGD Nord). Public access is ensured via the EU Directive 2003/4/EC executed as "Environmental information act (UIG)": https://sgdnord.rlp.de/fileadmin/sgdnord/Abteilung_2/IED/15_Aleris_UIB_Mrz_2020.pdf |
| 3.3a Payments to governments (legal and contractual) | Conformance | The Entity complies with the strict local legislation and has implemented policies and procedures to |

| CRITERION | RATING | COMMENT |
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| | | conform to this requirement. 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. |
| 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 | 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 3.4 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. |
| PRINCIPLE 4 MATERIAL STEWARDSHIP | | |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts) | Conformance | Life Cycle Assessments are implemented for standard and specialty products. The requirements of ISO 14040 are fulfilled. |
| 4.1b Environmental Life Cycle Assessment (cradle to gate) | Conformance | 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 Life Cycle Assessments will be delivered to customers for their products by request (they are including the cradle to gate process). |
| 4.1c Environmental Life Cycle Assessment (public communication) | Conformance | LCA are available for the relevant products as well as for a standard product. Relevant data can be accessed via the European Aluminum SDI: https://www.european-aluminium.eu |
| 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 procedure is implemented. Aluminum process scrap should be reduced to a minimum, if scrap is generated, it will be 100% recycled or reuse |
| 4.3b Aluminium Process Scrap (alloy separation) | Conformance | There is a closed-loop production. Aluminum alloys and grades are recorded separately and recycled according to type. |

| CRITERION | RATING | COMMENT |
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| 4.4a Collection and recycling of products at end-of-life (strategy) | Conformance | <p>An aluminium recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate is aimed for.</p> <p>The recycling strategy captures the product from the beginning to end of life.</p> |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance | <p>An aluminium recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate is aimed for.</p> <p>Novelis is actively engaged in European initiatives or groups that support and improve national collection rates.</p> |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS | | |
| 5.1 Disclosure of GHG emissions and energy use | Minor Non-Conformance | <p>The plant is part of the International Greenhouse Gas Trade (search for Aleris* under Account Holder Name):</p> <p>https://ec.europa.eu/clima/ets/oha.do?form=oha&languageCode=en&account.registryCodes=DE&accountHolder=&installationIdentifier=&installationName=&permitIdentifier=&mainActivityType=27&search=Search&searchType=oha%C2%A4tSortSettings=</p> <p>EHS figures such as energy consumption, emissions, waste numbers and water consumption are visible in working areas (shopfloor).</p> <p>However, the energy use by source on an annual basis is publicly disclosed in the Aleris Sustainability Report. Due to the recent transfer of Entity ownership, the validity of the now redundant web domain has resulted in an expired certificate for the domain and as such the Aleris Sustainability Report cannot be viewed safely and is identified by various web browsers as a potential security risk to the viewer. Therefore this information is not readily accessible to the public.</p> |
| 5.2 GHG emissions reductions | Minor Non-Conformance | <p>Environmental activities reducing the energy consumption and in line the Greenhouse Gas emissions (GHG) since years.</p> <p>However, GHG emissions KPI's and targets are available in the Aleris Sustainability Report. Due to the recent transfer of Entity ownership, the validity of the now redundant web domain has resulted in an expired certificate for the domain and as such the Aleris Sustainability Report cannot be viewed safely and is identified by various web browsers as a potential security risk to the viewer. Therefore this information is not readily accessible to the public.</p> |

| CRITERION | RATING | COMMENT |
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| 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 air are under tight control according to local regulations and permits. The emissions are monitored, controlled and reduced constantly. http://www.brd.nrw.de/umweltschutz/umweltueberwachung/industrieanlagenver/krwesel/Voerde/voer011-Aluminiumgieserei.html |
| 6.2 Discharges to Water | Conformance | Contamination of waters have to be reported to the competent authority in accordance with the "Wasserhaushaltsgesetz, WHG" without delay. Regular routine water checks are carried out. Discharges to water that have adverse effects on humans and the environment are under German law and in line with the operation permit of the Voerde plant. Discharges to water and the risk of emissions to the soil are since years subject to environmental goals published in the report of the immission protection officer (EHS Manager). NOVELIS/Aleris Casthouse is not directly discharging water. Discharging is through the waste water system of the permit holder, TRIMET. |
| 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 Criterion 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). |

| CRITERION | RATING | COMMENT |
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| 6.4a Reporting of Spills (immediate disclosure) | Conformance | The reporting of spills is regulated, trained and tested. There have been no reportable spills inside/outside the plant since ISO 14001 was implemented in 2018. |
| 6.4b Reporting of Spills (regular reporting) | Conformance | The reporting of spills is regulated, trained and tested. There are regular visits by the district government. There have been no reportable spills inside/outside the plant since ISO 14001 was implemented in 2018. http://www.brd.nrw.de/umweltschutz/umweltueberwachung/industrieanlagenver/krwesel/Voerde/voer011-Aluminiumgieszerei.html |
| 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 Criterion 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. http://www.brd.nrw.de/umweltschutz/umweltueberwachung/industrieanlagenver/krwesel/Voerde/voer011-Aluminiumgieszerei.html Due to the recent transfer of Entity ownership, the validity of the now redundant web domain has resulted in an expired certificate for the domain and as such the Aleris Sustainability Report cannot be viewed safely and is identified by various web browsers as a potential security risk to the viewer. Therefore this information is not readily accessible to the public. |
| 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. |

| CRITERION | RATING | COMMENT |
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| 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. |
| 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 Criterion 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 Criterion 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 Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit. |

| CRITERION | RATING | COMMENT |
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| 7.1a Water assessment (mapping) | Conformance | The Entity tracks its water usage according to local regulations (holder of the permits is TRIMET). 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 during authority visits as well as during the Environmental Management System review on an annual basis. We have assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit. |
| 7.2b Water management (monitoring) | Unable to Rate | Water management is implemented. Consumption figures and specifications are regularly monitored and reviewed. We have assessed this Criterion as 'Unable to Rate', until the Entity can be assessed during the on-site audit. |
| 7.3 Disclosure of water usage and risks | Conformance | The required water law approvals are available. The requirements of the Water Resources Act are met. Through regular inquiries of the district government, the requirements are checked, please see Report § 52 a Abs. 5 BImSchG: http://www.brd.nrw.de/umweltschutz/umweltueberwachung/industrieanlagenver/krwesel/Voerde/voer011-Aluminiumgieszerei.html |
| PRINCIPLE 8 BIODIVERSITY | | |
| 8.1 Biodiversity assessment | Conformance | Environmental Risk Assessments are carried out as part of approval procedures. The risk assessment covers the entire influence area of the (then) Aleris Voerde plant location including an assessment of biodiversity impacts. |
| 8.2a Biodiversity management (biodiversity action plans) | Not Applicable | Even though no material impact has been identified, there is regular reporting during the annual management review and the public report of the state environmental authorities. |
| 8.2b Biodiversity management (consultation and mitigation hierarchy) | Not Applicable | There were no material biodiversity impacts identified in the risk assessment. |

| CRITERION | RATING | COMMENT |
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| | | If necessary, biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently there are no open measures. Issues of biodiversity are also subject to any operating permit (BlmSchG). Even though no material impact has been identified, actions were taken to prevent biodiversity impacts. |
| 8.2c Biodiversity management (reporting) | Conformance | Even though no material impact has been identified, regular reporting process during the annual management review and the public report of the district government. |
| 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) are thermally treated (IPCC-treatment) to eliminate risk of alien species introduction 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://www.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-ENG-04292021.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 |

| CRITERION | RATING | COMMENT |
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| | | 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 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 of the ASI Performance Standard 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 of the ASI Performance Standard 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 of the ASI Performance Standard does not apply to the Entity, as no sacred or cultural heritage sites and values within the Entity's area of influence are present. Also, 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 ASI criteria. 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 of the ASI Performance Standard does not apply to the Entity, as no resettlements being considered or taking place during the period since joining ASI, or expected to occur during the |

| CRITERION | RATING | COMMENT |
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| | | 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 Voerde plant 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 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. The Entity in Voerde regularly participates in community events e.g. "Fahrradfreundliches Wesel" or "Stadtradeln, radeln für ein gutes Klima. See the press release and information by following the links: https://www.wesel.de/kultur-freizeit/fahrradfreundliches-wesel https://www.stadtradeln.de/home |
| 9.8 Conflict-Affected and High-Risk Areas | Not Applicable | Not applicable as the Entity in Voerde does not operate as an entity with external influence like a sales or procurement department. Such activities are centrally managed through the Entity in Koblenz. The Entity in Voerde can be seen as an external workbench for Koblenz. |
| 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) | Conformance | The Entity respects the local regulations on workers' rights and applies a collective agreement for the metallurgy sector. Most Workers joined a Trade Union and there is an elected Workers Council. |

| CRITERION | RATING | COMMENT |
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| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining) | Conformance | The Entity respects the local regulations on workers' rights and applies a collective agreement for the metallurgy sector. Most Workers joined a Trade Union and there is an elected Workers Council. No infringement to this requirement has ever been reported (e.g. Collective Bargaining). |
| 10.1c Freedom of Association and Right to Collective Bargaining (alternative means) | Not Applicable | The Entity only operates in Germany, a country that fully respect workers' rights. The Entity respects the freedom of association without interference. |
| 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 |

| CRITERION | RATING | COMMENT |
|---|----------------|--|
| | | 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 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. |

| CRITERION | RATING | COMMENT |
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| 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 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 |
| 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 |

| CRITERION | RATING | COMMENT |
|---|-------------|---|
| | | 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 has implemented a (non-certified) management system which is well established. An EHSQ Policy has been implemented and is communicated as required by the ASI Performance Standard. |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors) | Conformance | The Novelis Health and Safety Policy is applied to workers and visitors. Instruments and institutions are implemented as foreseen by local law (e.g. H&S committee, workplace risk assessment) or by Novelis internal instructions. Many activities are set (e.g. best behaviour practice, safety culture) to reduce workplace related risks. For further information see: https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf |
| 11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards) | Conformance | 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, please see: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work) | Conformance | 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. |
| 11.2 OH&S Management System | Conformance | A health and safety management system (non certified) is in place and effectively working. Any identified non-conformances are being actioned by the Entity. Internal and external audits are conducted to confirm effectiveness of the system. |
| 11.3 Employee engagement on health and safety | Conformance | Employees are involved in the preparation of risk assessments. The safety officers have a mandate in the regular occupational health and safety committees (4 times a year). |

| CRITERION | RATING | COMMENT |
|-----------------------|-------------|--|
| 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.</p> <p>Occupational safety committee meetings take place four times a year. There is a review of the numbers and the targets instead. Measures are discussed and coordinated there.</p> <p>The performance measures include lagging and leading indicator.</p> |

Document Control and Version History

| Revision | Date | Notes |
|----------|----------------|---|
| 0 | 31 August 2021 | Initial Certification Audit - Provisional Certification |