
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

ALUMINIUM NORF GmbH (ALUNORF)

CERTIFICATE
NUMBER

16

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

GUTCERT
(AFNOR
GROUP)

DATE OF ISSUE

22 DECEMBER 2021

DATE OF EXPIRY

21 DECEMBER 2024

CERTIFIED SINCE

29 JANUARY 2019

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Aluminium Norf GmbH ('Alunorf') in Neuss,
Germany, which is a joint venture owned by Speira
and Novelis Inc to produce aluminium coils.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Speira and Novelis Inc (Joint Venture)
ENTITY NAME	Aluminium Norf GmbH (Alunorf)
CERTIFICATION SCOPE	Aluminium Norf GmbH ('Alunorf') in Neuss, Germany, which is a joint venture owned by Speira and Novelis Inc to produce aluminium coils.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
ACQUISITION / DIVESTMENT	<p>Norsk Hydro sold the Hydro Aluminium Rolled Products business to Speira on 1 June 2021.</p> <p>For all certification transfers to different controlling Entities, ASI requires a Surveillance Audit or Re-Certification Audit of the new controlling Entity to be undertaken within 12 months from the transfer of Entity ownership.</p> <p>The Re-Certification Audit was undertaken with Speira within the nominated timeframe and prior to the expiry of the original Certification Period.</p>
AUDIT TYPE	<ul style="list-style-type: none">Re-Certification Audit
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">5 – 27 November and 3 – 4 December 2018 (Initial Certification Audit)26 – 28 October 2021 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">12 December 2018 (Initial Certification Audit)30 November 2021 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (5 – 27 November and 3 – 4 December 2018)</u></p> <p>The audit scope covered all production lines (delivery, melting halls, rolling mills, storage) to produce aluminium coils at the Alunorf facility in Neuss, Germany.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/Refining

- Casthouse
- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the audit scope.

Re-Certification Audit (26 – 28 October 2021)

The audit scope covered all production lines (delivery, melting halls, rolling mills, storage) to produce aluminium coils at the Alunorf facility in Neuss, Germany.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouse
- Semi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the audit scope.

AUDIT
OUTCOME

Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

22 December 2021– 21 December 2024

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

21 December 2024

CERTIFICATE
NUMBER

16

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 the ASI Performance Standard legal compliance requirements. There are systems in place (e.g., information systems, periodic audits, assignment of responsibilities, training) to maintain awareness of and to ensure compliance with Applicable Law. The Entity holds ISO 14001, ISO 45001 and ISO 50001 certifications from an accredited certification body as well as being registered under EU Eco-Audit and Management Scheme (EMAS). AluNorf joint venture partners Novelis and Speira support the site with legal counsel.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms. Among the instruments, is the Entity's Code of Conduct. The Entity has provided training to employees on business ethics. The financial system is periodically audited by an external tax auditor.
1.3 Code of Conduct	Conformance	The Entity has issued and communicated internally its Code of Conduct which includes relevant principles for environmental, social and governance performance.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has issued and communicated Policies regarding the environmental, social and governance facets and reviews them on an annual basis. They are consistent with the requirements of the ASI Performance Standard. Policy statements are publicly available in the following documents: Environmental Declaration 2019 (page 15): https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Umwelt/Umwelterkl%C3%A4rung2019d.pdf Social Report (page 5): https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Umwelt/Sozialbericht.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard as well as the Entity's Integrated Management System, the Entity has senior management endorsement and support through provision of

CRITERION	RATING	COMMENT
		resources and annual review of the Policies and results. The Entity has obtained ISO 14001, ISO 45001 and ISO 50001 certifications which are consistent with their ASI Performance Standard Certification Scope.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has made information about its Policies and values publicly available at its website: https://www.alunorf.de/verantwortung</p> <p>The following two documents contain policy statements:</p> <p>Environmental Declaration: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Umwelt/Umwelterklärung2019d.pdf</p> <p>Social Report: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Umwelt/Sozialbericht.pdf</p>
2.2 Leadership	Conformance	The Entity's Environmental Manager has the overall responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources to support the implementation of the Standard. This role is supported by local personnel.
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has documented and implemented an Environmental Management System according to ISO 14001:2015 and EMAS (EU Eco-Management and Audit Scheme). It is also certified according to ISO 50001 (Energy Management). This Management System is certified by an accredited certification body. Copies of the ISO 14001 certificate and EMAS registration are publicly available:</p> <p>https://www.alunorf.de/fileadmin/user_upload/Alunorf/Downloads/ISO_14001.pdf https://www.alunorf.de/fileadmin/user_upload/Alunorf/Downloads/EMAS-System.pdf</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has documented and implemented a Social Management System, however it is not certified or externally verified. Human Rights and Labour Rights are respected. Interviews with management, workers and their representatives confirmed the effective implementation of the Social Management System.</p> <p>There are manifold practices to ensure worker wellbeing (e.g. social counselling: support during personal crises; psychotherapy: bridging offer while waiting for a therapy place; resilience</p>

CRITERION	RATING	COMMENT
		counselling; increase resilience in group and individual coaching sessions; representation of severely disabled persons: organisation of the special interests of severely disabled colleagues). The Entity holds an ISO 45001 certification.
2.4 Responsible Sourcing	Conformance	As the Entity only completes the transformation process (remelting and rolling mill) and is supplied with metals by joint venture owners (Novelis and Speira) before delivering finished products back to the two owners, the metal purchasing is undertaken by Novelis and Speira. Still, Suppliers of the Entity are required to sign a supplier declaration, confirming that they abide to the Entity's standards with regards to governance, social and environment facets.
2.5 Impact Assessments	Conformance	There have been no projects or major changes which would have required a social, cultural or Human Rights Impact Assessment since the Entity joined ASI. All larger projects and changes are subject to environmental and health and safety Impact Assessments, as are already mandated by law.
2.6 Emergency Response Plan	Conformance	As part of the Entity's certified Management System according ISO 14001 and ISO 45001, Emergency Plans are in place. The Plans are periodically reviewed and found to be in conformance with the requirements of this Criterion.
2.7 Mergers and Acquisitions	Conformance	The Entity may only perform an acquisition with the consent of both owners, which has not happened to date. Should this happen, at least one owner has implemented a procedure covering the development and execution of investment projects. It ensures a uniform and consistent evaluation of project proposals and alignment across the Business Areas and ensures that environmental, social and governance issues are addressed in the Due Diligence process for mergers and acquisitions.
2.8 Closure, Decommissioning and Divestment	Conformance	Closure and decommissioning would be decided and handled by the two owners of the Entity. At least one owner has implemented a written directive covering all health, safety and environmental impacts. It describes the entire life cycle of operations, from exploration and planning

CRITERION	RATING	COMMENT
		through to operation and closure including decommissioning, remediation and rehabilitation.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Minor Non-Conformance	The Entity's Environmental Declaration and Social Report are publicly available on the Entity's website: https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit However, these documents do not adequately inform the public about the Entity's governance approach.
3.2 Non-compliance and liabilities	Minor Non-Conformance	As there were no compliance failures, the Entity did not publish information about significant fines, judgments, penalties and non-monetary sanctions for non-compliance with Applicable Law. It has been specified in writing, that in future the Entity will report about non-compliance and liabilities even if there were none.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only made, or have made on its behalf, payments to governments on a legal and/or contractual basis.
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 various stakeholder complaint mechanisms and has implemented a contact for external stakeholders: Email: complaints@alunorf.de Telephone: +49 2131 937 8336. Employees have various channels to direct their concerns, requests or grievances, e.g., there is a whistleblower hotline established ('Speakup'). The work council is involved in the resolution mechanism. The grievance mechanism is covered by a collective agreement.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity provided data to its joint venture owners (Speira and Novelis) who evaluated the cradle to gate life cycle impacts of its major product lines.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	One of the Entity's owners is able to address customer requests by providing the correct Life Cycle Assessment (LCA) information. Both joint

CRITERION	RATING	COMMENT
		venture owners are ASI Performance Standard Certified.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	When communicating externally on Life Cycle Assessment (LCA) information, the Entity communicates through its owners with the adequate assumptions and boundaries.
4.2 Product design	Conformance	The Entity's Joint Venture owners integrate sustainable requirements into the development process of new products and the Entity's production integrates sustainable goals and Key Performance Indicators.
4.3a Aluminium Process Scrap (targets)	Conformance	Scrap is well controlled by the Entity, which has enabled a reduction of scrap generation and 100% internally recycling.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity thoroughly separates alloys and grades for its internal recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has established a consistent aluminium recycling strategy.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity's Joint Venture owners have recycling strategies that engage stakeholders on different levels, markets and product lines. The Joint Venture owners are members of programs including the "Every can counts" to increase awareness on recycling.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity calculates its greenhouse gas (GHG) emissions and publicly disclose emissions annually in its verified Environmental Statement. Energy use by source is also disclosed. The latest Environmental Statement can be found via the following link:</p> <p>https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit</p> <p>As a suggested improvement, the carbon footprint could be externally verified to increase confidence in the complex calculation method.</p>
5.2 GHG emissions reductions	Conformance	The Entity has defined a long-term goal to reduce GHG emissions and has implemented multiple projects to achieve it. The main projects are published annually in the verified Environmental Statement with their associated GHG emission reduction targets. The latest Environmental

CRITERION	RATING	COMMENT
		Statement can be found via the following link (see page 6): https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
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 strictly controlled according to local regulations and permits. Emissions are below threshold values and implemented projects aim to further reduce emissions. A copy of the latest Environmental Statement can be found via the following link (see page 6): https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
6.2 Discharges to Water	Conformance	Discharges to Water are strictly controlled according to local regulations and permits. Emissions are below the threshold values and implemented projects aim at even more reducing these emissions. A copy of the latest Environmental Statement can be found via the following link (see page 7): https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Based on multiple legal requirements, the Entity performed risk assessments and implemented tight prevention measures for potential Spills or Leakages.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity performed risk assessments and implemented prevention measures and communication plans for potential Spills and Leakages. There have been no significant spills over the past 25 years.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has a procedure to communicate accordingly on significant Spills and report it publicly in its verified Environmental Statement. A copy of the latest Environmental Statement can be found via the following link:

CRITERION	RATING	COMMENT
		https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit There have been no significant spills over the past 25 years.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has a procedure to communicate accordingly on potential Spills and report these publicly in its verified Environmental Statement. A copy of the latest Environmental Statement can be found via the following link: https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit There have been no significant spill over the past 25 years.
6.5a Waste management and reporting (strategy)	Conformance	The Entity implemented a waste management strategy according to German law and the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity discloses the quantities of Hazardous and Non-Hazardous Wastes and their disposal methods in its annually verified Environment Statement. A copy of the latest Environmental Statement can be found via the following link (see page 9): https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	100% of the Dross is collected before being recycled externally. No Dross is landfilled.
6.8b Dross (recycling)	Conformance	100% of the Dross is collected before being recycled externally. No Dross is landfilled.
6.8c Dross (review of alternatives)	Conformance	100% of the Dross is collected before being recycled externally. No Dross is landfilled.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity tracks its water usage, withdrawal and effluent according to local regulations.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks within its Area of Influence and implemented prevention measures accordingly. There are no risks assessed as material.
7.2a Water management (management plans)	Conformance	Water-related risks were assessed as not material and all monitored values are below the authorized thresholds. Nevertheless, the Entity has implemented projects to reduce water related risks, which are regularly reviewed during the EMAS (EU Eco-Management and Audit Scheme) verifications. A copy of the latest Environmental Statement can be found via the following link (see page 7): https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
7.2b Water management (monitoring)	Conformance	Water-related risks were assessed as not material, and all monitored values are below the authorized thresholds. Nevertheless, the Entity has implemented projects to reduce water related risks, which are regularly reviewed during the EMAS (EU Eco-Management and Audit Scheme) verifications. A copy of the latest Environmental Statement can be found via the following link (see page 7): https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	All water withdraws and uses are disclosed and explained in the Environmental Statement. There were no water related risks assessed as material. A copy of the latest Environmental Statement can be found via the following link (see page 7): https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed biodiversity risks and materiality within its Area of Influence.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	Based on the risk analysis, no issue has been assessed as material, therefore, no action plan is required.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	Based on the risk analysis, no issue has been assessed as material, therefore, no action plan is required.
8.2c Biodiversity management (reporting)	Not Applicable	Based on the risk analysis, no issue has been assessed as material, therefore, no action plan is required.
8.3 Alien Species	Conformance	The Entity implements adequate actions to avoid the spread of Alien Species by solely using ISPM15 (International Standards for Phytosanitary Measures No.15) treated wood.
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 has committed to respect Human Rights in its Code of Conduct and has repeated this commitment in the Social Report: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Umwelt/Sozialbericht.pdf

CRITERION	RATING	COMMENT
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity's two owners (Speira and Novelis) have each conducted documented Human Rights Due Diligence assessments and provided the results to the Entity. Note that the Entity itself does not purchase aluminium but processes material on behalf of its owners.</p> <p>Human Rights aspects are covered by the Entity also in the procurement process, where suppliers are requested to respond to supplier questionnaires.</p> <p>During the assessment, there were no indications for Human Rights violations observed.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>As confirmed by interview with stakeholders, workers and management as well as by document review, there are no salient adverse Human Rights impacts present at the audited site. The Entity did not identify as having caused or contributed to adverse Human Rights impacts within in their Area of Influence.</p>
9.2 Women's Rights	Conformance	<p>Interviews with female workers, worker representatives, management and other staff did not identify any deliberate female Discrimination or issues regarding their wellbeing.</p>
9.3 Indigenous Peoples	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity (which is located in middle Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity (which is located in middle Europe), as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.</p>
9.5 Cultural and sacred heritage	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity, as sacred or cultural heritage sites are not within the Entity's direct Area of Influence. The Entity is situated in an industrial zone.</p>
9.6a Resettlements (avoid or minimise)	Not Applicable	<p>This Criterion of the ASI Performance Standard does not apply to the Entity, as no Resettlements are being considered or have taken place during the period since joining ASI, or expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.</p>

CRITERION	RATING	COMMENT
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as no Resettlements are being considered or have taken place during the period since joining ASI, or expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity is located within an industrial zone. Rights and interests of local Communities are respected, as relevant activities are subject to a permitting process by authorities. Stakeholder interviews and media research confirmed that there are no salient issues regarding rights and interests of local Communities.
9.7b Local Communities (impacts)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as the outcome of the Human Rights Due Diligence conducted has confirmed that there are no issues with local Communities and therefore no need for action.
9.7c Local Communities (livelihoods)	Not Applicable	This Criterion of the ASI Performance Standard does not apply to the Entity, as the Human Rights Due Diligence confirmed that there are no issues with local Communities and therefore no need for action. The Entity's Management Systems and controls are designed to prevent adverse impacts on local Communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity is not located in or near a Conflict-Affected or High-Risk Area. Risks inherent in the supply chain are either managed by the Entity's owners (Novelis and Speira) or by the Entity's own purchasing function, which conducts a supplier screening prior to procurement. During the assessment, there was no indication that the Entity could contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk areas.
9.9 Security practice	Conformance	The Entity does not employ armed security forces. During the Entity's Human Rights risk assessment, no specific risks related to security practices were identified. Worker interviews confirmed that there were no known Human Rights violations caused by the security service.

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	As confirmed by interviews with worker representatives, workers and management as well as by document review, the Entity respects the rights of Workers to participate in Worker Unions, seek representation and join the works council without interference. A freely elected Worker representation is in place.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity does respect the right of Collective Bargaining. Worker representatives and management negotiated a comprehensive set of Collective Bargaining Agreements.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion of the ASI Performance Standard is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is not restricted in the country where the Entity operates.
10.2a Child Labour (minimum age)	Conformance	The Entity has policies and practices in place to prevent any form of Child Labour. Child Labour is covered and prohibited by the Entity's Code of Conduct. The youngest Workers (apprentices) were 17 years old at the time of the audit.
10.2b Child Labour (hazardous)	Conformance	Persons below 18 years are only hired as apprentices, as confirmed by interviews and the employee roster. Hazardous work is conducted by these young Workers only as part of their vocational education and under supervision. School certificates are used to verify the age of applicants. Child Labour is covered by the Entity's Code of Conduct.
10.2c Child Labour (worst forms)	Conformance	The Entity does neither use, nor support the use of Child Labour and does not engage in or support Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not engage in or support Human Trafficking, neither directly nor through any employment or recruitment agencies, as confirmed by interviews and document review.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers - neither directly nor through employment or recruitment agencies, as confirmed by interviews and document review.

CRITERION	RATING	COMMENT
10.3c Forced Labour (migrant workers)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not require Migrant Workers to lodge deposits or security payments, neither directly nor through employment or recruitment agencies.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not hold Workers in debt bondage or force them to work in order to pay off a debt, as confirmed by interviews and document review.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace, as confirmed by interviews and a document review. The Entity does not provide on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates, as confirmed by interviews and a document review. Only copies of documents such as driving licences and training certificates are kept in the personnel files. Original documents are not kept on file.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does neither engage in, nor support the use of Forced Labour. The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	The Entity is committed to Non-Discrimination and communicates this commitment internally. The Entity does not engage in or support Discrimination for the grounds mentioned in this Criterion.
10.5 Communication and engagement	Conformance	The Entity does ensure open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment. Multiple communication channels are implemented and Workers are encouraged to speak up.

CRITERION	RATING	COMMENT
10.6 Disciplinary practices	Conformance	The Entity does neither engage in nor tolerate the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	The Entity does respect the rights of Workers to a living wage and ensures that wages paid for a normal working week are substantially above the legal minimum. Working Time, payment and leave are negotiated in Collective Bargaining Agreements. They are in line with the industry standard.
10.7b Remuneration (method of payment)	Conformance	The Entity's wage payments are timely, in legal tender and fully documented (monthly payments made via bank transfer, pay slips which are understandable and contain all necessary details regarding hours worked, Overtime, premiums and deductions - e.g. for tax and social insurance).
10.8 Working Time	Conformance	The Entity does comply with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreements and part of each employment contract. A clock-in system is in place with records kept on file
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has an Occupational Health and Safety Management System ISO 45001:2018, certified by an accredited certification body. There have been no non-conformances identified in recent audits and recommendations have been adequately addressed.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has an Occupational Health and Safety Management System ISO 45001:2018, certified by an accredited certification body. There have been no non-conformances identified in recent audits and recommendations have been adequately addressed.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has an Occupational Health and Safety Management System ISO 45001:2018, certified by an accredited certification body. There have been no non-conformances identified in recent audits and recommendations have been adequately addressed.

CRITERION	RATING	COMMENT
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has an Occupational Health and Safety Management System ISO 45001:2018, certified by an accredited certification body. There have been no non-conformances identified in recent audits and recommendations have been adequately addressed.
11.2 OH&S Management System	Conformance	The Entity has an Occupational Health and Safety Management System ISO 45001:2018, certified by an accredited certification body. There have been no non-conformances identified in recent audits and recommendations have been adequately addressed.
11.3 Employee engagement on health and safety	Conformance	The Entity has an Occupational Health and Safety Management System ISO 45001:2018, certified by an accredited certification body. There have been no non-conformances identified in recent audits and recommendations have been adequately addressed.
11.4 OH&S performance	Conformance	The Entity has an Occupational Health and Safety Management System ISO 45001:2018, certified by an accredited certification body. There have been no non-conformances identified in recent audits and recommendations have been adequately addressed.

Document Control and Version History

Revision	Date	Notes
0	23 November 2021	Initial Certification Audit – Full Certification
1	22 December 2021	Re-Certification Audit. Updated the Supply Chain Activities listed in Rev 0 to correctly represent the Certification Scope which included Aluminium Re-melting/Refining and Casthouse activities;