
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

NOVELIS ITALIA S.p.A. (PIEVE)

CERTIFICATE
NUMBER

127

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

SZI GmbH

DATE OF ISSUE

19 APRIL 2022

DATE OF EXPIRY

18 APRIL 2025

CERTIFIED SINCE

31 MARCH 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 Pieve site to produce
aluminium products including remelting/recycling,
continuous casting and cold rolling.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Italia S.p.A. (Pieve)
CERTIFICATION SCOPE	All activities on the Pieve site to produce aluminium products including remelting/recycling, continuous casting and cold rolling.
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 (20 – 22 January 2021)Surveillance Audit (23 November 2021)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">20 – 22 January 2021 (Initial Certification Audit)23 November 2021 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">18 March 2021 (Initial Certification Audit)6 April 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (20 – 22 January 2021)</u></p> <p>The audit scope includes all activities on the Pieve site to produce aluminium products including remelting/recycling, continuous casting and cold rolling.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (January 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>

Surveillance Audit (23 November 2021)

The audit scope includes all activities on the Pieve site to produce aluminium products including remelting/recycling, continuous casting and cold rolling.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT
OUTCOME

- Provisional Certification (Initial Certification Audit)
- Full Certification (Surveillance Audit)

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

19 April 2022 – 18 April 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

18 April 2025

CERTIFICATE
NUMBER

127

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, ISO 45001 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/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.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, Quality, Safety (EHQS) Policy is communicated both internally and externally. Internal communication is ensured through annual training and regular announcements. External communication is given via the Novelis webpage: https://www.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 their EHQS Policy, the Entity has senior management endorsement and support through provision of resources and regularly review the

CRITERION	RATING	COMMENT
		policies. The Entity obtained ISO 14001, ISO 9001, ISO 50001 and ISO 45001 certifications which are consistent with their ASI Certification Scope.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Novelis EHQS Policy is continuously communicated both internally and externally. Internal communication is ensured through annual training and regular announcements. A copy of the latest EHQS 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 Performance Standard. A group of Senior Management Representatives have been nominated for having overall responsibility and authority to ensure conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Environmental Management System according to ISO 14001. 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. The Entity has implemented and fulfills the requirements of a Social Management System (SA 8000). Compliance is ensured through regular verification and audits.
2.4 Responsible Sourcing	Conformance	The Entity's Supplier Code of Conduct is in accordance with requirements of the ASI Performance Standard. Novelis has implemented a Responsible Sourcing Policy at a Group level, addressing environmental, social and governance issues: https://www.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-ENG-04292021.pdf
2.5 Impact Assessments	Conformance	As part of the internal risk assessments, the influencing factors such as environment, social and human rights are recorded and evaluated in the context of new projects and system changes. No new projects or major changes to existing facilities took place since the Entity joined ASI. The Entity is located in a highly regulated country (Italy), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and

CRITERION	RATING	COMMENT
		authorization process (including Human Rights). The Entity has systems in place to manage this effectively.
2.6 Emergency Response Plan	Conformance	The Entity has a well implemented and trained Emergency Response Plan. External stakeholders including the community and authorities are involved. There is regular training with local fire fighters, the Community and Workers.
2.7 Mergers and Acquisitions	Conformance	Acquisitions executed by Novelis Headquarters are accompanied by a Due Diligence process and supported by external specialists to reflect environmental, social and governance issues.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity systematically reviews environmental, social and governance issues as part of the Entity's planning process. Closure, decommissioning and divestment is not managed on local level but by Corporate Headquarters. There were no closure, decommissioning and divestment plans for the Entity since joining ASI.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity is included as part of the Novelis Group sustainability reporting. The Group publicly disclosed its governance approach and material environmental, social and economic impacts under the following web-link: https://www.novelis.com/sustainability-commitments
3.2 Non-compliance and liabilities	Conformance	The Entity is part of the Aditya Birla Group Annual Report. There are several internal and external compliance audits. Legal deviations are published by the district government when they occur. There were no significant fines, judgements and penalties and non-monetary sanctions received during the last period: http://www.hindalco.com/upload/pdf/hindalco-integrated-annual-report-2020-21.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity complies with local legislation and has implemented policies and procedures to conform to these requirements. 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.

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3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity is certified ISO 14001:2015 and ISO 45001:2018 and has implemented complaints resolution mechanisms. A whistleblowing hotline is in place.
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. Aluminium Association and European Aluminium Sustainable Development Indicators (SDI): https://www.european-aluminium.eu/media/1998/2017-01-30-epd3-anodised-sheet-novelis.pdf Life Cycle Assessments (which include the cradle to gate process) are provided to customers by request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	LCA's are available for the relevant products as well as for a standard product. Relevant data can be accessed via the European Aluminium Sustainable Development Indicators SDI: https://www.european-aluminium.eu/media/1998/2017-01-30-epd3-anodised-sheet-novelis.pdf
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	A working scrap management plan is implemented. Aluminium Process Scrap should be reduced to a minimum, if scrap is generated it will be 100% recycled or reused.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	There is a closed-loop production. Aluminium alloys and grades are recorded separately and recycled according to type.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	An aluminium recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate is aimed for. The recycling strategy captures the product from the beginning to end of life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	An aluminium recycling strategy is in place. The set goals are fulfilled and thus a continuous increase of the recycling rate is aimed for. Novelis is actively engaged in European initiatives or groups that support and improve national collection rates.

CRITERION	RATING	COMMENT
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity is not part of the Greenhouse Gas Emissions Trading Scheme (ETS). EHS data including energy consumption, emissions, waste numbers and water consumption are visible in working areas (shop floor). The Entity's energy use by source on an annual basis is publicly disclosed. GHG emissions KPI's and targets are provided in the documents 'Our Path to a More Sustainable and Circular Future' and the Green Bond Framework: https://de.novelis.com/wp-content/uploads/2021/03/Novelis-Sustainability-Platform.pdf https://de.novelis.com/wp-content/uploads/2021/07/Novelis-Green-Bond-Framework_2021_Final.pdf
5.2 GHG emissions reductions	Conformance	Environmental activities to reduce energy consumption and as such Greenhouse Gas (GHG) emissions are undertaken. GHG emissions KPI's and targets are provided in the documents 'Our Path to a More Sustainable and Circular Future' and the Green Bond Framework: https://de.novelis.com/wp-content/uploads/2021/03/Novelis-Sustainability-Platform.pdf https://de.novelis.com/wp-content/uploads/2021/07/Novelis-Green-Bond-Framework_2021_Final.pdf
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 controlled according to local regulations and permits. The emissions are monitored, controlled and reduced constantly.
6.2 Discharges to Water	Conformance	Discharges to Water that have adverse effects on humans and the environment are controlled under Italian law, reported and in line with the operation permit of the Entity.

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has undertaken 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.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has undertaken risk assessments and implemented prevention measures on material Leakages. Relevant Spills are reported to the Authority and by the Authority to all other relevant interested parties (if necessary).
6.4a Reporting of Spills (immediate disclosure)	Conformance	The reporting of Spills is regulated, trained and tested. There have been no reportable Spills at the plant since ISO 14001 was implemented in 1999.
6.4b Reporting of Spills (regular reporting)	Conformance	The reporting of Spills is regulated, trained and tested. There are regular visits by the state environmental authorities. There have been no reportable Spills at the plant since ISO 14001 was implemented in 1999.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a Waste Management Strategy. The goals in the field of waste management are fulfilled and a reduction of the waste stream is recognizable. The Entity's Waste Management Strategy has been completed in accordance with the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	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. Quantities of Hazardous and Non-Hazardous Waste generated by the Entity and the associated waste disposal method are publicly disclosed annually. Environmental activities to reduce energy consumption and as such GHG emissions are undertaken. GHG emissions KPI's and targets are provided in the documents 'Our Path to a More Sustainable and Circular Future' and the Green Bond Framework: https://de.novelis.com/wp-content/uploads/2021/03/Novelis-Sustainability-Platform.pdf

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		https://de.novelis.com/wp-content/uploads/2021/07/Novelis-Green-Bond-Framework_2021_Final.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.
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	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, where Dross is treated and returned as aluminium bars.
6.8b Dross (recycling)	Conformance	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, where Dross is treated and returned as aluminium bars.
6.8c Dross (review of alternatives)	Conformance	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

CRITERION	RATING	COMMENT
		contractors, where Dross is treated and returned as aluminium bars.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity tracks its water usage according to local regulations. An overview of the water inputs, the various consumers and the different wastewater flows are described and regularly reviewed.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks and implemented prevention measures accordingly in their entire Area of Influence.
7.2a Water management (management plans)	Conformance	The Entity has implemented targets for water management. The targets are regularly reviewed during authority visits as well as during the Environmental Management System review on an annual basis.
7.2b Water management (monitoring)	Conformance	Consumption figures and specifications are regularly monitored and reviewed.
7.3 Disclosure of water usage and risks	Conformance	The required water law approvals are available. The requirements of Italian water law are met. Through regular inquiries of the state environmental authorities, these requirements are checked.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Environmental Risk Assessments are undertaken as part of approval procedures. The risk assessment addresses the entire Area of Influence of the Pieve plant including an assessment of Biodiversity impacts.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	There are no material Biodiversity impacts identified in the risk assessment. If necessary, biodiversity actions will be included in the Environmental Action Plan and would be regularly reviewed. Currently there are no open measures.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	There are no material Biodiversity impacts identified in the risk assessment. If necessary, biodiversity actions will be included in the Environmental Action Plan and would be regularly reviewed. Currently there are no open measures. Issues of biodiversity are also subject to any operating permit. Even though no material impact has been identified, actions were taken to prevent biodiversity impacts.

CRITERION	RATING	COMMENT
8.2c Biodiversity management (reporting)	Conformance	No material Biodiversity impact has been identified, however there are regular reporting processes including the annual management review and the public report to the state environmental authorities.
8.3 Alien Species	Conformance	The Entity has taken preventive action to prevent the introduction of Alien Species. Packaging material used for export materials (e.g. wooden pallets, NIMP15) are thermally treated to eliminate risk of Alien Species being introduced to other regions.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	Novelis publicly subscribes to the United Nations Guiding Principles and has issued and communicated both its Code of Conduct (Promote a Desirable Work Environment) and Supplier Code of Conduct (Labour and Human Rights), which includes a commitment to respect Human Rights, accessible via the following links: https://www.novelis.com/wp-content/uploads/2021/10/Novelis-Code-of-Conduct-October-2021-ENG.pdf 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 assessment, the requirements of Human Rights within the Area of Influence of the Entity were examined. The focus is a preventive approach to identify legal issues in advance.
9.1c Human Rights Due Diligence (remediation)	Conformance	The local compliance assessment (in accordance with SA 8000) has confirmed that there are no salient adverse Human Rights impacts present at the audited site. The Entity did not identify any issue that

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		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 does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	Currently, no expansion of the entire plant is planned which may have impact on this Criterion. However, the requirements of the ASI Performance Standard will be considered as part of new risk assessment.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion does not apply to the Entity, as no Resettlements are being considered or have taken place during the period since joining ASI, or expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity does not claim any resources that could lead to a lack of resources in the area and among its population. The Entity respects and is very sensitive to the neighbourhood, the Community and all other interest groups in the vicinity. 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

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		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 in order to respect and support their livelihoods.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has strict procedures to ensure it does not contribute in any way to Human Rights abuses in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity mainly performs their own security however contracts an external security provider for gate control and plant security. The Entity does not employ armed security forces.
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. All Workers are free to join local union organizations.
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. All Workers are free to join any local union organizations. No infringement to this requirement has been reported (e.g. Collective Bargaining).
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity operates in Italy, a country that fully respect Workers' rights. The Entity respects the Freedom of Association without interference.
10.2a Child Labour (minimum age)	Conformance	The Entity's policies and local regulations are in place to avoid the use of Child Labour. The Entity has a strict control over any potential Child Labour.
10.2b Child Labour (hazardous)	Conformance	The Entity neither uses nor supports the use of Child Labour and does not engage in or support Hazardous Child Labour. Young Workers (between 15 and 18 years) are employed for education/training only. Work with hazardous substances happens only under supervision and as part of vocational education.
10.2c Child Labour (worst forms)	Conformance	The Entity neither uses nor supports the use of Child Labour and does not engage in or support Worst Forms of Child Labour.

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10.3a Forced Labour (human trafficking)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not require Workers to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity neither engages in nor supports 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.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace. The Entity does not provide on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity neither engages in nor supports 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	As confirmed by interviews and document review, the Entity ensures equal opportunity and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. This is also reinforced via the Novelis Code of Conduct.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of

CRITERION	RATING	COMMENT
		workplace and compensation issues, without threat of reprisal, intimidation or harassment.
10.6 Disciplinary practices	Conformance	The Entity neither engages in nor tolerates 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 respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard. Working Time, payment and leave are negotiated in collective bargaining agreements. The wages paid are substantially above the legal minimum.
10.7b Remuneration (method of payment)	Conformance	The Entity's wage payments are timely, in legal tender and fully documented.
10.8 Working Time	Conformance	The Entity complies 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 clocking-in system is in place and records are on hand.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body. The Entity has implemented and communicated its OH&S Policy as required by the ASI Performance Standard.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Health and Safety Policy is applied to Workers and Visitors. Instruments and institutions such as the Health & Safety (H&S) Committee and workplace risk assessment, are implemented as foreseen by local law or by Novelis internal instructions. Many activities such as best behaviour practice and safety culture are established to reduce workplace-related risks. For further information please refer: 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 implemented and published and is made accessible to all employees, Visitors and suppliers (intranet / internet). The Policy includes the obligation to comply with legal requirements: https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf

CRITERION	RATING	COMMENT
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Employees are regularly briefed on the hazards 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 in accordance with ISO 45001 has been implemented. Any identified non-conformances are being actioned by the Entity. The certificate is valid and covers the full Entity's ASI Certification Scope. The Entity's Safety Management System is well implemented. 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. Safety officers have a mandate in the regular Occupational Health and Safety Committees (quarterly).
11.4 OH&S performance	Conformance	The continuous improvement of Occupational Health and Safety performance is driven by performance indicators and the achievement of goals. Occupational Health and Safety Committee meetings are held quarterly. These meetings include a review and discussion of performance data, targets and measures. Performance measures include both lagging and leading indicators.

Document Control and Version History

Revision	Date	Notes
0	31 March 2021	Initial Certification Audit – Provisional Certification
1	19 April 2022	Surveillance Audit – Full Certification