

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NOVELIS (VOERDE)

CERTIFICATE
NUMBER

146

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

SZI GmbH

DATE OF ISSUE

30 AUGUST 2022

DATE OF EXPIRY

29 AUGUST 2025

CERTIFIED SINCE

31 AUGUST 2021

AUTHORISED BY

A stylized signature in black ink.

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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 (30 – 31 March 2021)Surveillance Audit (3 February 2022)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">30 – 31 March 2021 (Initial Certification Audit)3 February 2022 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">7 July 2021 (Initial Certification Audit)30 June 2022 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (30 – 31 March 2021)</u></p> <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</p>

review of relevant documentation and webcam footage of specific controls related to high-risk activities.

Surveillance Audit (3 February 2022)

The audit scope includes all activities on the Voerde (Germany) casthouse site to produce aluminium products including melting and casting.

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

- 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

30 August 2022 – 29 August 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

29 February 2024

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. Systems have been implemented 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	Minor Non-Conformance	<p>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</p> <p>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</p> <p>However, employee awareness of the Code of Conduct should be increased. Furthermore, the Entity has not systematically trained the Code nor made the organization aware of changes made to the document following an update.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Novelis Group Environment, Health, Quality, Safety (EHQS) Policy is communicated both internally and externally. Internal communication is ensured through annual trainings and informational announcements. The external communication is given via the Novelis webpage: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p>

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard, as well as the EHSQ Policy, the Entity has senior management endorsement and support through provision of resources and regularly review the 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 EHSQ Policy is continuously communicated both internally and externally. Internal communication is ensured through annual trainings and informational announcements. The EHSQ Policy is available: 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 Management Representative group has been appointed for having overall responsibility and authority to ensure conformance with the ASI Performance Standard at Entity level.
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 established 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). Compliance is ensured through regular verifications and audits.
2.4 Responsible Sourcing	Minor Non-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 However, the screening activities for both new on-boarded suppliers as well as re-evaluated suppliers do not include adequate focus on social aspects to proactively identify potential deviations from the

CRITERION	RATING	COMMENT
		Novelis Supplier Code of Conduct to allow appropriate mitigation actions to be established.
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 Projects or Major Changes to existing facilities have occurred 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 thorough analysis and authorization process (including Human Rights) and the Entity has implemented systems to manage this effectively.
2.6 Emergency Response Plan	Conformance	The Entity has implemented and trained the Emergency Response Plan. External Stakeholders including the Local Community and relevant authority are involved. Regular trainings with the local fire fighters, the Community and Workers are undertaken.
2.7 Mergers and Acquisitions	Conformance	Acquisitions executed by the 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 Entity since they joined ASI.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity is part of the Novelis Group sustainability reporting. The Group publicly disclosed its governance approach and its material environmental, social and economic impacts at the following link: https://www.novelis.com/sustainability-commitments
3.2 Non-compliance and liabilities	Conformance	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)'.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity complies with local legislation and has implemented policies and procedures to conform to

CRITERION	RATING	COMMENT
		this requirement. To prevent Corruption, detailed behaviour expectations are described in the Novelis Code of Conduct, and includes the requirements where 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	Conformance	The Entity is certified against ISO 14001:2015 and ISO 45001:2018 and has implemented Complaints Resolution Mechanisms. A whistleblowing and ethics hotline is accessible.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Life Cycle Assessments (LCA) have been conducted for the Entity's 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 Life Cycle Assessments (LCA), which are cradle to gate, are delivered to customers for their products upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	LCA are available for the relevant products as well as for a standard product. Data can be accessed via the European Aluminium 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	The Entity has implemented a working scrap management procedure. Aluminium Process Scrap is reduced to a minimum, and if scrap is generated, it is 100% recycled or reuse.
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 established 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.

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	An aluminium recycling strategy is in place. The established 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.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The plant is part of the International Greenhouse Gas Trade (search for Aleris* under Account Holder Name field): https://bit.ly/3wflSx6</p> <p>Data including energy consumption, emissions, waste numbers and water consumption are visible in working areas (shopfloor). The energy use by source on an annual basis is publicly disclosed on the Novelis sustainability platform. GHG Emissions Key Performance Indicators (KPI's) and targets are provided in 'Our Path to a More Sustainable and Circular Future' and '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</p>
5.2 GHG emissions reductions	Conformance	<p>Environmental activities reducing the energy consumption and Greenhouse Gas (GHG) Emissions have been ongoing for several years. GHG Emissions Key Performance Indicators (KPI's) and targets are available on the Novelis Sustainability platform and in the 'Our Path to a More Sustainable and Circular Future' and '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</p>
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		

CRITERION	RATING	COMMENT
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: http://www.brd.nrw.de/umweltschutz/umweltueberwachung/industrieanlagenver/kwiesel/Voerde/voer011-Aluminiumgieszerei.html
6.2 Discharges to Water	Conformance	Contamination of water is reported to the relevant authority in accordance with the "Wasser Haushalts Gesetz, 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 accordance with the Entity's operating permit. Discharges to Water and the risk of emissions to the soil are subject to environmental goals published in the report of the 'Immission Protection Officer' (EHS Manager). The Entity is not directly discharging water. Discharge is via the wastewater system of the permit holder, TRIMET.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has 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.
6.3b Assessment and Management of Spills and Leakage (management)	Minor Non-Conformance	The Entity has 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). However, the audit found waste containers where a valid inspection had not been undertaken.
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 2018: https://bit.ly/36chZPV
6.5a Waste management and reporting (strategy)	Conformance	The Entity implemented a Waste Management Strategy. The goals in the field of waste management

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		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.
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Authority may, if necessary, request the report of the Waste Officer.. Regular monitoring by the district government verifies compliance with legal requirements: https://bit.ly/36chZPV</p> <p>Quantities of Hazardous and Non-Hazardous Waste generated by the Entity and associated waste disposal method are publicly disclosed annually. Key Performance Indicators (KPI's) and targets are provided in 'Our Path to a More Sustainable and Circular Future' and 'Green Bond Framework'.</p>
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

CRITERION	RATING	COMMENT
		stop the oxidation process, it is sent to external local contractors, who treat the Dross and return it 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, who treat the Dross and return it 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 contractors, who treat the Dross and return it as aluminium bars. There is no landfilling of Dross residues.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity monitors 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 has assessed its water-related risks and implemented prevention measures accordingly in their Area of Influence.
7.2a Water management (management plans)	Conformance	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.
7.2b Water management (monitoring)	Conformance	Water management is implemented. Consumption figures and specifications are regularly monitored and reviewed.
7.3 Disclosure of water usage and risks	Conformance	<p>The required water approvals are available. The requirements of the Water Resources Act are met. Through regular inquiries of the district government, the requirements are checked, please refer https://bit.ly/36chZPV</p> <p>The Novelis sustainability platform presents relevant information:</p> <p>https://de.novelis.com/wp-content/uploads/2021/03/Novelis-Sustainability-Platform.pdf</p> <p>https://de.novelis.com/wp-content/uploads/2021/07/Novelis-Green-Bond-Framework_2021_Final.pdf</p>

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PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Environmental Risk Assessments are carried out as part of approval procedures. The risk assessment covers the Area of Influence of the Entity 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 to 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. 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 permits. 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, there is regular reporting during the annual management review and the public report to 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

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		<p>Conduct (Labour and Human Rights), which includes a commitment to respect Human Rights. The Codes can be accessed via the following links:</p> <p>https://novelis.com/wp-content/uploads/2020/07/Code-of-Conduct.pdf</p> <p>https://www.novelis.com/wp-content/uploads/2021/04/Novelis-Supplier-Code-of-Conduct-ENG-04292021.pdf</p>
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.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has not identified any issues 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 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 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	This Criterion does not apply as there is no planned expansion of the entire plant which may have impact. However, the requirements of the ASI Performance

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		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 sensitive to the neighbourhood, the community and all other interest groups in the vicinity of the work. An evaluation of the interested parties was undertaken.
9.7b Local Communities (impacts)	Conformance	A Social Self Assessment undertaken in accordance with 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 regularly participates in community events e.g., "Fahrradfreundliches Wesel" or "Stadtradeln, radeln für ein gutes Klima". Refer to the press release and information for further detail: https://www.wesel.de/kultur-freizeit/fahrradfreundliches-wesel https://www.stadtradeln.de/home
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented various processes to foster responsible sourcing. A regular Corruption and country review of suppliers has been performed, and some countries have been banned to prevent the risk.
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity mainly perform security practices internally but also 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. The majority of Workers have

CRITERION	RATING	COMMENT
		joined a Trade Union and there is an elected Workers Council.
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. The majority of Workers have joined a Trade Union and there is an elected Workers Council. Infringement to this requirement has never been reported (e.g., Collective Bargaining).
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable to the Entity, as there is no need for alternative means in the country where the Entity is located.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented Policies and local regulations are in place to avoid hire of Child Labour. The Entity has a strict control over any potential Child Labour.
10.2b Child Labour (hazardous)	Conformance	The Entity does neither uses nor supports the use of Child Labour and does not engage in or support Hazardous Child Labour. Young Workers are employed for educational purpose only. If at all, 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.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does neither engage 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, as confirmed by interviews and document review.
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, as confirmed by interviews and document review.
10.3c Forced Labour (migrant workers)	Conformance	The Entity neither engages in nor supports the use of Forced Labour. The Entity does not require Migrant Workers to lodge deposits or security payments at any time, as confirmed by interviews and document review.
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

CRITERION	RATING	COMMENT
		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 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, as confirmed by interviews and document review. 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, as confirmed by interviews and document review.
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, as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	As confirmed by interviews and document review, the Entity ensures equal opportunities 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.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, the Entity ensures 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.
10.6 Disciplinary practices	Conformance	As confirmed by interviews and document review, 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 does respect the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard, as confirmed by document review and Worker interviews. Working Time, payment and leave are

CRITERION	RATING	COMMENT
		negotiated in Collective Bargaining Agreements. The wages paid are substantially above the legal minimum and are in line with the industry standard.
10.7b Remuneration (method of payment)	Conformance	As verified by document review and interviews during the assessment, 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 kept.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity implements and maintains an Occupational Health and Safety Policy supported by senior management: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Novelis Health and Safety Policy is applied to Workers and Visitors. Instruments and institutions are implemented as foreseen by local law (e.g., Health and Safety Committee, workplace risk assessment) or by Novelis internal instructions. Many activities are established to reduce workplace related risks (e.g., best behaviour practice, safety culture). For further information: 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) has been developed and published. It is accessible to all employees, visitors and suppliers (intranet / internet). The Policy includes the obligation to comply with legal requirements: 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 workplace hazards (based on the risk assessment). Employees have the right and obligation to report unsafe conditions and stop work immediately if necessary.
11.2 OH&S Management System	Conformance	An Occupational Health and Safety (OH&S) Management System (non certified) is implemented

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		and working effectively. Any identified non-conformances are being actioned by the Entity. Internal and external audits are conducted to confirm effectiveness of the OH&S 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 Committee meetings (held four times a year).
11.4 OH&S performance	Conformance	The continuous improvement of Occupational Health and Safety (OH&S) performance is driven by performance indicators and the achievement of goals. OH&S Committee meetings are held four times a year. There is a review of the numbers and the targets and measures are discussed and coordinated. The performance measures include lagging and leading indicator.

Document Control and Version History

Revision	Date	Notes
0	31 August 2021	Initial Certification Audit - Provisional Certification
1	30 August 2022	Surveillance Audit – Full Certification