
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**NOVELIS
DEUTSCHLAND
GmbH WERK OHLE**

CERTIFICATE
NUMBER

50

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

SZI GMBH

DATE OF ISSUE

25 NOVEMBER 2022

DATE OF EXPIRY

24 NOVEMBER 2025

CERTIFIED SINCE

25 NOVEMBER 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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 at the Novelis Ohle plant in Germany to produce aluminium products including cold mill, semi-finished products, packaging products and flexible tubes.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Deutschland GmbH Werk Ohle
CERTIFICATION SCOPE	All activities at the Novelis Ohle plant in Germany to produce aluminium products including cold mill, semi-finished products, packaging products and flexible tubes.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (29 May and 7 – 8 August 2019)Re-Certification Audit (28 April 2022)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">29 May 2019 and 7 – 8 August 2019 (Initial Certification Audit)27 – 28 April 2022 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">21 September 2019 (Initial Certification Audit)25 November 2022 (Re-Certification Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (29 May 2019 and 7 – 8 August 2019)</u> Cold mill semi-finished products, packaging products and flexible tubes manufactured at the Novelis Ohle plant (Germany).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification Audit (27-28 April 2022)</u> Cold mill semi-finished products, packaging products and flexible tubes manufactured at the Novelis Ohle plant (Germany).</p> <p>Supply chain activities included in the audit scope:</p>

-
- 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

25 November 2022 – 24 November 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

24 May 2024

CERTIFICATE
NUMBER

50

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'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, 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 for employees with regard to business ethics. At the corporate level, a whistleblowing hotline is available 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 is available at: 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 at: 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 provided training on 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 training and 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 the provision of resources and regular review of 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 training and announcements. The EHSQ Policy is available at: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
2.2 Leadership	Conformance	The Novelis CEO has corporate responsibility and authority to ensure conformance with the ASI Performance Standard. A management group has been nominated for having responsibility at the 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. Furthermore, the Entity has implemented and fulfils the requirements of a Social Management System (SA 8000). Compliance is regularly audited.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a responsible sourcing Policy covering environmental, social and governance issues. The Entity has implemented a Supplier Code of Conduct and a supplier declaration that covers environmental, social and governance issues: https://www.novelis.com/wp-content/uploads/2022/07/Novelis-Supplier-Code-of-Conduct-ENG-07262022.pdf The main suppliers have provided a signed declaration and completed a self-declaration. Suppliers are regularly assessed.
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.

CRITERION	RATING	COMMENT
		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.
2.6 Emergency Response Plan	Conformance	The Entity has implemented and provided training on the Crises Communication Plan and the Emergency Response Plan. External Stakeholders including the Local Community and relevant authorities are involved. Regular training with the local firefighters, the Community and Workers is undertaken.
2.7 Mergers and Acquisitions	Conformance	Acquisitions executed by Novelis Corporate 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 has systematically reviewed environmental, social and governance issues as part of the Entity's planning process. Closure, decommissioning and divestment are not managed at a local level but by Novelis Corporate. 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: https://www.novelis.com/wp-content/uploads/2021/03/Novelis-Sustainability-Platform.pdf In addition, important information on the environment, health and ethics can be viewed at the publicly accessible reception areas via posters, flyers, and screens.
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 (Bezirksregierung Arnsberg). Public access is ensured via the EU Directive 2003/4/EC executed as the 'Environmental Information Act (UIG)'. More information is available at:

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		https://www.bra.nrw.de/system/files/media/document/file/novelis-deutschland-gmbh_-_plettenberg-13_07_2020.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 this requirement. To prevent Corruption, detailed behaviour expectations are described in the Novelis Code of Conduct, and include 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 has implemented a Complaints Resolution Mechanism. 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 such as the 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	LCAs are available for the relevant products as well as for standard products. Relevant data can be accessed via the European Aluminium SDI. https://european-aluminium.eu/members/novelis
4.2 Product design	Conformance	When developing new products, the Entity considers the topic of sustainability and conducts a life cycle analysis.
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 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.

CRITERION	RATING	COMMENT
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 in 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	The Entity has implemented an aluminium recycling strategy. The established goals are fulfilled and thus a continuous increase in the recycling rate is aimed for. The recycling strategy captures the product from the beginning to End of Life.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity is not part of the International Greenhouse Gas Trade. EHS figures such as energy consumption, emissions, waste numbers and water consumption are visible in the publicly accessible entrance areas on screens and posters and are visible in working areas (shopfloor).</p> <p>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':</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>
5.2 GHG emissions reductions	Conformance	<p>Environmental activities reducing energy consumption and Greenhouse Gas (GHG) Emissions have been ongoing for several years. GHG Emissions 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':</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>
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.

CRITERION	RATING	COMMENT
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 that have adverse effects on humans and the environment are controlled according to German law and reported in accordance with the Entity's operating permit. The emissions are 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 German law and reported in accordance with the Entity's operating permit.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has performed risk assessments and implemented prevention measures for material leakages.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has performed risk assessments and implemented prevention measures for material leakages. Relevant Spills are reported to the Authority and by the Authority to all other relevant public interest 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 inside/outside the plant since ISO 14001 was implemented in 2014.
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 2014. Further information is available at: http://bit.ly/3tJ8GyW
6.5a Waste management and reporting (strategy)	Conformance	The Entity implemented a waste management strategy. The goals in the field of Waste Management are fulfilled. A reduction of the waste streams is recognisable. 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 are made available to the public. Regular monitoring by the district government verifies compliance with legal requirements: http://bit.ly/3tJ8GyW

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		All quantities of Hazardous and Non-Hazardous Waste generated by the Entity and associated Waste disposal methods will be publicly disclosed in the Sustainability Report: https://www.novelis.com/sustainability
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 (state 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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity monitors its water usage according to local regulations. An overview of the water entrances, the

CRITERION	RATING	COMMENT
		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 water management plans with targets. There is an annual review.
7.2b Water management (monitoring)	Conformance	The Entity has implemented water management and water 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: http://bit.ly/3tJ8GyW</p> <p>The relevant water withdrawals (consumption) and sources can be viewed via the information and screens displayed at the public entrance areas. The Novelis sustainability platform presents relevant information: https://www.novelis.com/sustainability</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Environmental risk assessments are undertaken as part of the approval procedures. The risk assessment addresses the Area of Influence of the Entity including an assessment of biodiversity Impacts.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as 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.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as 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 the operating permit (BlmSchG). Even though no material impact has been identified, actions were taken to prevent biodiversity impacts.
8.2c Biodiversity management (reporting)	Not Applicable	Even though no material impact has been identified, there is regular reporting during the annual

CRITERION	RATING	COMMENT
		management review and the public report to the district government: http://bit.ly/3tJ8GyW
8.3 Alien Species	Conformance	The Entity has taken preventive actions to prevent the introduction of Alien Species
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 implemented a Code of Conduct and Policies with the commitment to respect Human Rights.
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 the ‘Preventive Approach’ to identify legal issues in advance.
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 implemented policies and tools to ensure women’s rights are respected at all times.
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.

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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)	Conformance	The Entity has no plans for the expansion of the production Facilities. However, should the situation change any requirement for Resettlement will be considered as part of a risk assessment.
9.6b Resettlements (where unavoidable)	Conformance	The Entity has no plans that require consideration of Resettlements. However, should the situation change the global directive from Novelis would apply.
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 the population. The Entity respects and is sensitive to the neighbourhood, the Community and all other interest groups in the vicinity. An evaluation of the interested parties was undertaken.
9.7b Local Communities (impacts)	Conformance	The Entity has conducted a social self assessment in accordance with SA8000 that confirmed there are no issues with Local Communities and therefore there is 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, including the Entity, to engage with Local Communities. The Entity regularly participates in community events.
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.
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 the right to freedom of association and collective bargaining are not restricted.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented Policies and local regulations are in place to avoid the hire of Child Labour. The Entity has 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 are employed for educational purposes 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 the Worst Forms of Child Labour.
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, 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 Debt Bondage or force them to work in order to pay

CRITERION	RATING	COMMENT
		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	The Entity ensures equal opportunities and does not engage in or support Discrimination, as confirmed by interviews and document review.
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 workplace and compensation issues, without the threat of reprisal, intimidation, or harassment. This was confirmed by interviews and document review.
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. This was confirmed by interviews and document review.
10.7a Remuneration (living wage)	Conformance	The Entity respects Workers' rights 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 negotiated in Collective Bargaining Agreements. The wages paid are above the legal minimum and 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, as verified by

CRITERION	RATING	COMMENT
		document review and interviews during the assessment.
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 has established and implemented a Management System. An Environment, Health, Safety and Quality (EHSQ) Policy has been implemented and communicated.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	Employees and contractors are regularly briefed (on an annual basis) regarding the Environment, Health, Safety and Quality Policy and procedures.
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). Workers 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 has been implemented. Internal and external audits are conducted to confirm the effectiveness of the OH&S Management System. Any identified non-conformances are actioned by the Entity.
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 OH&S 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

CRITERION	RATING	COMMENT
		the targets and measures are discussed and coordinated. The performance measures include lagging and leading indicators.

Document Control and Version History

Revision	Date	Notes
0	25 November 2019	Initial Certification Audit – Full Certification
1	17 January 2023	Re-Certification Audit – Full Certification