

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Novelis Deutschland GmbH Werk Goettingen

CERTIFICATE NUMBER  
97

ASI STANDARD  
PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION  
LEVEL  
FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM  
SZI GMBH

DATE OF ISSUE  
2 OCTOBER 2023

DATE OF EXPIRY  
1 OCTOBER 2026

CERTIFIED SINCE  
2 OCTOBER 2020

## AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto:info@aluminium-stewardship.org)

*Validity of this Certificate is subject to  
continued conformance with the  
applicable ASI Standard and can be  
verified at  
[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)*

## CERTIFICATION SCOPE

All activities on the Goettingen (Germany) site to produce aluminium products including coating, finishing and impact extrusion.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Deutschland GmbH Werk Goettingen
CERTIFICATION SCOPE	All activities on the Goettingen (Germany) site to produce aluminium products including coating, finishing and impact extrusion.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Semi-Fabrication</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V3</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (6 May – 17 June 2020)</li><li>Surveillance Audit (29 – 30 March 2022)</li><li>Re-Certification and Scope Change Audit (5 – 7 September 2023)</li></ul>
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none"><li>6 May – 17 June 2020 (Initial Certification Audit)</li><li>29 – 30 March 2022 (Surveillance Audit)</li><li>5 – 7 September 2023 (Re-Certification and Scope Change Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>7 September 2020 (Initial Certification Audit)</li><li>3 May 2023 (Surveillance Audit)</li><li>14 September 2023 (Re-Certification and Scope Change Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (6 May – 17 June 2020)</u></p> <p>The Audit Scope covered all Processes applied in Goettingen facility.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Semi-Fabrication</li></ul> <p>All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (29 – 30 March 2022)</u></p> <p>The audit scope included the Goettingen facility and its industrial products.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Semi-Fabrication</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the audit scope.</p> <p><u>Re-Certification and Scope Change Audit (5 – 7 September 2023)</u></p> <p>The audit scope included the Goettingen facility and its industrial products.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Semi-Fabrication</li></ul>

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

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AUDIT OUTCOME

- Certification

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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.
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CERTIFICATION PERIOD

2 October 2023 – 1 October 2026

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NEXT AUDIT TYPE

Surveillance Audit

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NEXT AUDIT DATE

2 April 2025

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CERTIFICATE NUMBER

97

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If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

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## ENTITY OVERVIEW

The Göttingen plant is located in central Germany and has been in operation since 1909. It specialises in the surface-treatment of rolled aluminium. More than 1,200 different systems are used for decorative or functional coatings, which are adjusted precisely to match the final customer application process.

The facility has multiple capabilities for the treatment of aluminium coils including, pre-treatment, lacquering, laminating, finishing and impact extrusion and is a recognised leader in the supply of aluminium for markets including:

- Surface-finished aluminium for beverage, food and cosmetic can producers
- Plain and surface-finished aluminium for building and construction, signage, and other specialty product industries
- Impact extrusion for bottles, aerosol cans, cartridges and technical packaging.

Novelis has operated a Research and Development centre in Göttingen since 2007 focusing on the examination and development of surface coatings and the simulation of end user's production processes. In addition, the site is a competence centre for many central services within Novelis Europe.

The 23acre site is located on the outskirts of the city and employs approximately 700 and has links to the Göttingen University. Active in the local area, the plant supports many initiatives under the 'Novelis Neighbor' programme including annual sponsorship of the Göttingen City Run and since 2013 Novelis has been supporting robotics school teams close to Göttingen to inspire young people in science and technology at an early age.

## MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
<b>SYSTEMS</b>	High	High	High	High
<b>RISKS</b>	High	High	High	High
<b>PERFORMANCE</b>	High	High	High	High
<b>OVERALL</b>		<b>HIGH</b>		

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has implemented a process to constantly maintain awareness of and ensure Compliance with the latest Applicable Law.
1.2 Anti-Corruption	Conformance	The topic of Anti-Corruption is regulated at the Entity. Novelis Group specifications are trained and implemented at the Business level.
1.3a-e Code of Conduct	Conformance	The Entity has implemented the Novelis Code of Conduct and has provided training on the Code. Suppliers must comply with the Supplier Code of Conduct. Both documents are available at: <a href="https://www.novelis.com/download/code-of-conduct">https://www.novelis.com/download/code-of-conduct</a> <a href="https://www.novelis.com/wp-content/uploads/2022/07/Novelis-Supplier-Code-of-Conduct-ENG-07262022.pdf">https://www.novelis.com/wp-content/uploads/2022/07/Novelis-Supplier-Code-of-Conduct-ENG-07262022.pdf</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented an Environment, Health, Safety and Quality (EHSQ) Policy which is communicated both internally and externally via the Novelis website. Internal communication is ensured through annual training and announcements. The Entity has senior management endorsement and support through the provision of resources and regular review of the Policies. The Entity has obtained ISO 14001, ISO 50001 and ISO 45001 certifications which are consistent with the Certification Scope.
2.2a-c Leadership	Conformance	The Novelis CEO has corporate responsibility and authority to ensure conformance with the ASI Performance Standard. The Entity has defined the Management Representative for ASI.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an Integrated Management System according to ISO 9001, ISO 14001, ISO 50001, and ISO 45001. These systems are certified by an accredited certification body.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has documented and implemented an Environmental Management System that is certified according to ISO 14001:2015. Furthermore, the Entity has implemented and fulfils the requirements for SA 8000 and 'Together for Sustainability' (TfS). Internal social and compliance audits are undertaken regularly.
2.4a-e 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: <a href="https://www.novelis.com/wp-content/uploads/2022/07/Novelis-Supplier-Code-of-Conduct-ENG-07262022.pdf">https://www.novelis.com/wp-content/uploads/2022/07/Novelis-Supplier-Code-of-Conduct-ENG-07262022.pdf</a> Key suppliers complete a supplier self-declaration and sign it. Suppliers are regularly assessed.

CRITERION	RATING	COMMENT
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there are 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 authorisation process (including Human Rights). The Entity has established systems to manage this and conduct internal risk assessments which include environmental, social and Human Rights.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there are 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 authorisation process including Human Rights. The Entity has established systems to manage this requirement and conduct internal risk assessments which include environmental, social and Human Rights, where and when required.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented and provided training on the Emergency Response Plan. External Stakeholders including the Local Community and authority are involved in the development of this Plan. Regular training with the local firefighters, the Community and Workers is undertaken. The Emergency Response Plans are available to Stakeholders on request.
2.8a-d Suspended Operations	Conformance	The Entity has implemented a Business Resilience Plan. All involved parties are trained, and evacuation or fire drills are carried out frequently. An app has been introduced to support responsible persons in case of an emergency, breakdown, fire, or accident with all necessary documents and contact details.
2.9a-b Mergers and Acquisitions	Conformance	Mergers and Acquisitions are executed by Novelis Corporate and are accompanied by a Due Diligence process that is supported by external specialists to reflect environmental, social and governance issues.
2.10a-b 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 the local, Entity level but by Novelis Corporate. There have been no closure, decommissioning or divestment plans for the Entity since it joined ASI.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity is included in the Novelis Group Sustainability Report. The Group has publicly disclosed its governance approach and its Material environmental, social and economic impacts in the Novelis Global Sustainability Report: <a href="https://de.novelis.com/wp-content/uploads/2022/12/Novelis-FY2022-Sustainability-Report.pdf">https://de.novelis.com/wp-content/uploads/2022/12/Novelis-FY2022-Sustainability-Report.pdf</a> <a href="https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf">https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf</a>
3.2 Non-compliance and Liabilities	Conformance	The Entity is included in the Novelis Group Sustainability Report. The Entity-specific information on significant fines, judgments, penalties,

CRITERION	RATING	COMMENT
		and non-monetary sanctions is published by the district government (Landkreis Göttingen). Public access is ensured via the EU Directive 2003/4/EC executed as the 'Environmental Information Act (UIG)'. <hr/>
3.3a-c Payments to Governments	Conformance	The Entity complies with local legislation and has implemented Policies and procedures regarding payments to governments. To prevent Corruption, detailed behaviour expectations are described in the Novelis Code of Conduct, and include the requirements where payments are made to authorities and payments to governments are not allowed. Employees are trained on the Code of Conduct on an annual basis. <hr/>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity is certified against ISO 9001, ISO 14001, ISO 50001 and ISO 45001 and has implemented a process for handling complaints. A whistleblowing hotline has been established (Novelis Ethics Hotline: 0800-180-7003) and complaints can be submitted online at: <a href="https://de.novelis.com/contact">https://de.novelis.com/contact</a> <hr/>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted Life Cycle Assessments (LCA) for their standard and specialty Products. The requirements of ISO 14040 are fulfilled. <hr/>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity contributes Life Cycle Inventory (LCI) data to regional initiatives such as the Aluminum Association and European Aluminium Sustainable Development Indicators. LCAs include underlying assumptions and system boundaries, which are cradle-to-gate and are delivered to customers for their Products upon request. LCAs are available for the relevant Products as well as for a standard product. Relevant data can be accessed via the European Aluminium SDI: <a href="https://european-aluminium.eu/members/novelis">https://european-aluminium.eu/members/novelis</a> <hr/>
4.2 Product Design	Conformance	When developing new Products, the Entity takes into consideration sustainability and conducts a life cycle analysis. Environmental key metrics have been developed to enhance sustainability, including the environmental life cycle impacts of the end Product. <hr/>
4.3a-b Aluminium Process Scrap	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. There is closed-loop production and Aluminium alloys and grades are recorded separately and recycled according to type. <hr/>
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope. <hr/>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has developed and implemented an Aluminium Recycling Strategy. The established goals are fulfilled and thus a continuous increase in the recycling rate is achieved. The Entity is actively engaged in European initiatives or groups that support and improve national collection rates (e.g., Duale System Deutschland). <hr/>

CRITERION	RATING	COMMENT
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	Data relating to environment, health and safety including energy consumption, emissions, waste data and water consumption are presented in working areas (shopfloor). Detailed Greenhouse Gases (GHG) emissions information is available in the Novelis Global Sustainability Report: <a href="https://de.novelis.com/wp-content/uploads/2022/12/Novelis-FY2022-Sustainability-Report.pdf">https://de.novelis.com/wp-content/uploads/2022/12/Novelis-FY2022-Sustainability-Report.pdf</a>  GHG emissions data were independently verified.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity has outlined and established initiatives and activities within each level to achieve the 2050 goal of carbon neutrality in their Decarbonisation Strategy. Activities to reduce GHG emissions have been targeted and planned for several years. Results are tracked and posted in the annual Sustainability Report. Detailed information is available in the Novelis Global Sustainability Report: <a href="https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf">https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf</a>  Activities to reduce GHG emissions have been incorporated into different projects which will be followed by different Stakeholders on plant and at the regional level.
5.4 GHG Emissions Management	Conformance	The Entity has implemented ISO 50001 Management Systems. Projects to reduce energy consumption are ongoing and the effects of GHG emissions reduction are calculated
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	Emissions to Air are under tight control according to local regulations and permits and the limits are met. The emissions are monitored, controlled and reduced constantly. Projects to reduce emissions are planned a tracked at the plant and regional levels.
6.2a-g 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. Discharges to Water are not Material.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has performed risk assessments and implemented measures to prevent and detect contamination of air, water, and soil. Regular internal audits are conducted to verify the effectiveness and adherence to defined actions. Emergency procedures for major risk areas have been introduced. The Entity has performed risk assessments and implemented prevention measures for Material



CRITERION	RATING	COMMENT
		Leakages. Relevant Spills are reported to the authority and by the authority to all other relevant public interest parties (if necessary).
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The reporting of Spills is regulated, trained, and tested. There have been no reportable Spills at the Entity since the ISO 14001 standard was implemented in 2014.
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a Waste management strategy. The goals for Waste management are fulfilled and a reduction of the Waste streams is confirmed. The Entity's Waste Management Strategy has been completed in accordance with the Waste Mitigation Hierarchy. The quantity of Hazardous and Non-Hazardous Waste generated by the Entity and associated Waste disposal methods are disclosed in the Novelis Global Sustainability Report: <a href="https://de.novelis.com/wp-content/uploads/2022/12/Novelis-FY2022-Sustainability-Report.pdf">https://de.novelis.com/wp-content/uploads/2022/12/Novelis-FY2022-Sustainability-Report.pdf</a>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>7. WATER STEWARDSHIP</b>		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity monitors its water usage according to local regulations. An overview of water inputs, the various consumers and the different wastewater flows are described and regularly reviewed. Water use data is available in the 2023 Sustainability Report: <a href="https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf">https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf</a>  The Entity has assessed its water-related risks and implemented prevention measures accordingly throughout its Area of Influence. There are no Material water-related risks identified.
7.2a-e Water Management	Not Applicable	This criterion is not applicable to the Entity as no Material water-related risks were identified.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Environmental risk assessments are undertaken as part of the approval procedures for legal requirements The risk assessment addresses the Area of Influence of the Entity including an assessment of biodiversity impacts. There were no Material risks identified.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity 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.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as there were no Material biodiversity impacts identified in the risk assessment. If necessary,

CRITERION	RATING	COMMENT
		biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently, there are no open measures.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, 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.
8.4 Alien Species	Conformance	The Entity has taken preventive actions to prevent the introduction of Alien Species. Packaging materials used for export materials (e.g., wooden pallets) are thermally treated (IPCC-treatment) to eliminate the risk of Alien Species introduction to other regions.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	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, there are no World Heritage sites in or near the Area of Influence of the Entity.
8.6a-d Protected Areas	Conformance	The Entity has identified there are no Protected Areas within their Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
<b>9. HUMAN RIGHTS</b>		
9.1a-d Human Rights Due Diligence	Conformance	The Entity has implemented a Code of Conduct and associated Policies with a commitment to respect Human Rights. As part of a risk assessment, the requirements of Human Rights within the Area of Influence of the Entity were examined. The Entity has not identified any issues that have caused or contributed to adverse Human Rights impacts. A Letter of Commitment on UN Global Compact: <a href="https://ungc-production.s3.us-west-2.amazonaws.com/attachments/Organization/129081/original/Novelis_Inc._-_Letter_of_Recommitment.pdf?1542995069">https://ungc-production.s3.us-west-2.amazonaws.com/attachments/Organization/129081/original/Novelis_Inc._-_Letter_of_Recommitment.pdf?1542995069</a>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented Policies and tools to ensure Women's Rights are respected at any time.. All initiatives and results are available in the 2023 Sustainability Report: <a href="https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&amp;utm_medium=download&amp;utm_campaign=sustainability_report_2023&amp;utm_id=sustainability">https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&amp;utm_medium=download&amp;utm_campaign=sustainability_report_2023&amp;utm_id=sustainability</a>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in Germany where the Entity operates.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in Germany where the Entity operates.

CRITERION	RATING	COMMENT
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in Germany where the Entity operates.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites and values within the Entity's Area of Influence are present.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no plans to expand the plant, no relocation is being considered or has occurred since joining ASI, and there are no expected relocations during the Certification Period. However, the requirements will be taken into account in any future risk assessment.
9.7a-h Affected Populations and Organisations	Conformance	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. The Novelis Group requests each of its sites, including the Entity, to engage with Local Communities. The Entity regularly participates in community events (e.g., Göttinger Altstadtlauf).
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented Management Systems and associated procedures to ensure it does not contribute to Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). To become a Novelis supplier, the supplier must accept the Novelis Supplier Code of Conduct and confirm they follow the Code. The Code allows for the Entity to undertake audits or inspections of their suppliers and request self-assessments to ensure supplier compliance. The Supplier Code of Conduct is available at: <a href="https://www.novelis.com/wp-content/uploads/2022/07/Novelis-Supplier-Code-of-Conduct-ENG-07262022.pdf">https://www.novelis.com/wp-content/uploads/2022/07/Novelis-Supplier-Code-of-Conduct-ENG-07262022.pdf</a>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity evaluates and assesses their suppliers based on various aspects of the Supplier Code of Conduct and assigns a risk score to each supplier. This risk score helps the Entity determine whether any action is needed or not. If needed, suppliers may be blocked.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a Supplier management process and Supplier Code of Conduct which allows them to undertake audits or inspections at the supplier level and conduct an annual supplier evaluation. Risks are recognised at the identification stage, allowing them to react accordingly and on an ad hoc basis.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Management Systems are audited annually by an external certification body which includes internal audits for Due Diligence practices.

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity reports annually on the management of responsible sourcing, which is available at: <a href="https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf">https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf</a>
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity predominantly performs security practices internally but also contracts an external security provider for gate control and plant security. The Entity does not employ armed security forces.
<b>10. LABOUR RIGHTS</b>		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the local regulations on Workers' rights and applies a collective agreement for the metallurgical sector. The majority of the Entity's Workers have joined a Trade Union and there is an elected Workers council in place.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity as it operates in Germany where Freedom of Association and Right to Collective Bargaining is allowed.
10.2a Child Labour	Conformance	The Entity has implemented Policies and local regulations are in place to avoid the hiring of Child Labour. The Entity neither uses nor supports the use of Child Labour and does not engage in nor support Hazardous Child Labour. Young Workers are employed for educational purposes only. Work with hazardous substances happens rarely, and only under supervision and as part of the vocational education provided.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity neither engages in, nor supports the use of Forced Labour and follows the hiring process and operations according to German law and ILO conventions. The Entity does not engage in, nor supports Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and document review.  However, it was identified a stand-alone Modern Slavery Statement is not available or publicly disclosed.
10.4a-c Non-Discrimination	Conformance	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 based on 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. Positions are classified and are part of a collective agreement. This was confirmed by interviews and document review.
10.5 Communication and engagement	Conformance	The Entity places a significant importance to good relations with its employees and promotes a "Say Anything culture" including conducting Employee Engagement Surveys. Interviews with the works council confirmed that the cooperation is effective. Discussions are also handled professionally and constructively.

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Minor Non-Conformance	<p>The Entity has developed standards in collaboration with the Works Council that set out clear rules where 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 with the Worker council and document review. All employees attend culture workshops.</p> <p>However, it was identified that whilst a Harassment Policy is available, it is currently not publicly disclosed.</p>
10.7a-c Remuneration	Conformance	<p>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, as confirmed by document review and Worker interviews. Working Time, payment and leave are negotiated in the Collective Bargaining Agreement. The wages paid are substantially above the legal minimum and they are in line with the industry standard. The Entity's wage payments are timely, in legal tender and fully documented, as verified by interviews and document review.</p>
10.8a-c Working Time	Conformance	<p>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 Agreement and part of each employment contract. A clocking-in system is in place and records are kept.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs employees of their Rights via different channels including the intranet and information boards. The workers council holds frequent meetings with Workers and a complaints management process is in place for employees.</p>
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented an Occupational Health and Safety (OH&amp;S) Management System that conforms to the requirements of ISO45001 and is effectively working. The certificate is valid and covers the Entity's ASI Certification Scope. The Entity's Safety Management System is well implemented.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Entity annually provides data on accident statistics to the Metal Industry Association (WVMetalle). WVMetalle analyses these data and publishes annual statistics relating to the metal sector.</p> <p>In the area of reportable accidents (per 1,000,000 hours), the Göttingen plant is five times lower than the average. The examples of leading and lagging indicators that are tracked are accidents, DAWF, Serious injuries and fatalities (SIF), near misses, amount of leadership tours, the number of safety training completed and Behaviour Based Safety (BBS).</p> <p>However, it was identified that the Entity's leading indicators are currently not publicly disclosed.</p>
11.2 Employee engagement on Health and Safety	Minor Non-Conformance	<p>Employees are engaged in the preparation of risk assessments. The Safety Officers have a mandate at regular OH&amp;S Committee meetings which are held four times a year. Accidents are reported internally and externally to relevant parties.</p>

CRITERION	RATING	COMMENT
		However, it was identified there was one reportable OH&S incident which was closed but the resulting action was not documented.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	2 October 2020	Issued (Initial Certification)
1	22 May 2023	Surveillance Audit
2	24 November 2023	Re-Certification and Scope Change Audit from Performance Standard V2 to V3.