

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NOVELIS NORTH AMERICA - GUTHRIE

CERTIFICATE
NUMBER

322

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

DNV BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

25 OCTOBER 2023

DATE OF EXPIRY

24 OCTOBER 2026

CERTIFIED SINCE

25 OCTOBER 2023

AUTHORISED BY

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

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

CERTIFICATION SCOPE

The hot milling, pre-treatment and finishing of
automotive aluminium products at the Novelis
Guthrie facility, KY (USA).

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME Novelis Inc.

ENTITY NAME Novelis North America – Guthrie

CERTIFICATION SCOPE The hot milling, pre-treatment and finishing of automotive aluminium products at the Novelis Guthrie facility, KY (USA).

SUPPLY CHAIN ACTIVITIES

- Material Conversion (Production and Transformation)

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Initial Certification Audit

AUDIT FIRM DNV Business Assurance Services UK Ltd.

AUDIT DATE 18 – 20 April 2023

AUDIT REPORT SUBMISSION 14 August 2023

AUDIT SCOPE The audit scope includes the hot milling, pre-treatment and finishing of automotive aluminium products at the Novelis Guthrie facility, KY.

The supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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.

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- 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 25 October 2023 – 24 October 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 25 April 2025

CERTIFICATE NUMBER 322

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented an adequate system to monitor and comply with the applicable legal requirements through the use of procedures and worksheets to demonstrate compliance with legal requirements.
1.2 Anti-Corruption	Conformance	The Entity has implemented a Code of Conduct, including principles relevant to environmental, social, and governance performance. For more information, refer to: https://www.novelis.com/?s=code+of+conduct&post_type=download
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct, including principles relevant to environmental, social, and governance performance. For more information, refer to: https://www.novelis.com/?s=code+of+conduct&post_type=download
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented Policies consistent with environmental, social, and governance practices. For more information refer to: https://www.novelis.com/?s=policy&post_type=page
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented a document control system and it was evidenced that the senior management have endorsed and support the Policies through the availability of resources and undertaking periodic review. For more information refer to: https://www.novelis.com/?s=policy&post_type=page
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Employees are trained and undergo annual refresher training on the environmental, social and governance Policies. Other evidence of communication is posted throughout the Facility. The Policies are available on the Novelis website: https://www.novelis.com/?s=policy&post_type=page
2.2 Leadership	Conformance	A senior Management Representative has been nominated as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity's Management System has been certified against ISO 14001, which is confirmed via the Novelis Environmental Metrics Reporting and Management Directive: https://www.novelis.com/certifications/
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has defined and documented the Social Management System in the Social Responsibility Policy. For more information refer to: https://www.novelis.com/about-us/people/
2.4 Responsible Sourcing	Conformance	The Entity has defined and documented the Social Management System in the Social Responsibility Policy. For more information refer to: https://www.novelis.com/about-us/people/ The Entity has implemented a Responsible Purchasing Policy and a Code of Conduct for Suppliers covering environmental, social, and governance issues. For more information, refer to: https://www.novelis.com/suppliers/
2.5 Impact Assessments	Conformance	
2.6 Emergency Response Plan	Conformance	The Entity has developed and implemented an Emergency Response Plan, which addresses emergency evacuation maps, site egress and firefighting equipment.
2.7 Mergers and Acquisitions	Conformance	Any merger and/or acquisition activities at the Entity are managed by Novelis Corporate.
2.8 Closure, Decommissioning and Divestment	Conformance	Any closure, decommissioning and divestment activities at the Entity are managed by Novelis Corporate.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Novelis Sustainability Report is available on the Corporate website, which also includes information on corporate sustainability goals: https://www.novelis.com/sustainability/
3.2 Non-compliance and liabilities	Conformance	The Entity includes information on fines, prosecutions, penalties and sanctions which are publicly disclosed on the US Environmental Protection Authority (EPA) website for Enforcement and Compliance History Online (ECHO): https://echo.epa.gov/facilities/facility-search/results
3.3a Payments to governments (legal and contractual)	Conformance	All operational taxes and fees payments are made only on behalf of the Entity. The Entity has in place a step-by-step procedure for analysing, approving and making

CRITERION	RATING	COMMENT
		payments to the Government, in accordance with the Anti-Corruption Policy.
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 accessible, transparent, understandable and gender- and culture-sensitive grievance mechanisms suitable for dealing with grievances, grievances and requests for information from Stakeholders related to its operations. For more information refer to: https://www.novelis.com/suppliers/ethics-line-vox-novelis/
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity publicly discloses the environmental Life Cycle Assessment through the report prepared by the Aluminum Association which is relevant to the Entity's products. For more information refer to: https://www.aluminum.org/
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity publicly discloses the environmental Life Cycle Assessment through the report prepared by the Aluminum Association which is relevant to the Entity's products. For more information refer to: https://www.aluminum.org/
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The original production data (primary data) of each individual unit process was directly collected either by the Aluminum Association (AA) or the International Aluminium Institute (IAI), from more than 100 production facilities representing a large majority of the industry in Canada and the United States.
4.2 Product design	Not Applicable	This Criterion is not applicable as the Entity does not design at the Facility, all design records are issued from Corporate and are confidential.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity's Scrap Recovery Overview includes Batch Annealing with scrap. The current target scrap recovery is 80%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity's plant-level scrap process includes alloy recycle percentage to prime alloy percentage.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented a recycling strategy, which includes specific timelines, activities and targets.

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has engaged with local, regional or national collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their Products containing Aluminium.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts for, and publicly discloses material GHG emissions and energy use by source annually on the CDP Climate Change platform and the US EPA Platform: https://echo.epa.gov
5.2 GHG emissions reductions	Conformance	Annual GHG emissions and energy use targets are publicly disclosed within sustainability reports and corporate annual reports. The Entity's goal is to reduce GHG emissions by 30% and energy intensity by 10% by 2026, with other goals including the 'Car2Car' recycling program, zero carbon cars and low carbon aluminium. The Entity accounts for, and publicly discloses material GHG emissions and energy use by source annually on the CDP Climate Change platform and on the USEPA Platform: https://pt-br.novelis.com/wp-content/uploads/2022/Novelis-Sustainability-Platform.pdf https://www.novelis.com/wp-content/uploads/2022/12/Novelis-FY2022-Sustainability-Report.pdf
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity quantifies and reports emissions to the atmosphere that have adverse effects on humans or the environment, being available through the Freedom of Information Act (FOIA). This is defined in the Operation, Maintenance and Monitoring Plan procedure, defining the planning to minimise the adverse impact generated to the environment.
6.2 Discharges to Water	Conformance	The Entity has completed an assessment of the main risk areas of operations where Spills and Leakage can

CRITERION	RATING	COMMENT
		contaminate the air, water and/or soil via an Environmental Aspects/Safety HIRARC Inventory. This demonstrated that the water discharge, when undertaken, is properly treated by the Effluent Treatment system, meeting the pre-defined parameters.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has undertaken an assessment of the main risk areas of operations where Spills and Leakage can contaminate the air, water and/or soil through a Spill Prevention, Control and Response Performance Standard procedure.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented the management plan and external communication, compliance controls and monitoring program to prevent and detect Spills and Leakages through the Spill Prevention, Control and Response Performance Standard procedure. No spill situation that has caused any kind of impact has been identified.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented the management plan and external communication, compliance controls and monitoring program to prevent and detect Spills and Leakage through the Spill Prevention, Control and Response Performance Standard procedure. No spill situation has been identified, which caused any type of impact and need for external communication.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented the management plan and external communication, compliance controls and monitoring program to prevent and detect Spills and Leakage through the Spill Prevention, Control and Response Performance Standard procedure. No spill situation has been identified, which caused any type of impact and need for external communication.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a waste management strategy that has been designed in accordance with the Waste Mitigation Hierarchy through the Waste Management Program Procedure. The Waste Inventory report 2021/2022 was sighted during the audit, which considers both Hazardous and Non-Hazardous Waste.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has implemented a waste management strategy that has been designed in accordance with the Waste Mitigation Hierarchy through the Waste Management Program Procedure. The Waste Inventory report 2021/2022 was sighted during the audit, which considers both hazardous and

CRITERION	RATING	COMMENT
		non-hazardous waste. The Entity has publicly disclosed the amount of Hazardous and Non-Hazardous Waste generated in the Sustainability Report.
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 has identified and mapped water use by source and type. The water balance includes water withdrawals, discharge and consumption.

CRITERION	RATING	COMMENT
7.1b Water assessment (risk assessment)	Conformance	The Entity has evaluated the risks related to water in Watersheds in the Entity's Area of Influence through the Watershed Assessment Report, and the data for risk assessment were extracted from: https://www.wri.org/aqueduct The result of the risk assessment indicates the risk is low.
7.2a Water management (management plans)	Conformance	The result of the Entity's risk assessment related to water in hydrographic basins in the Entity's Area of Influence indicates the risk is low. However, the Entity monitors its water use monthly for reporting.
7.2b Water management (monitoring)	Conformance	The result of the Entity's risk assessment related to water in hydrographic basins in the Entity's Area of Influence indicate the risk is low. However, the Entity monitors its water use monthly for reporting.
7.3 Disclosure of water usage and risks	Conformance	The Entity has evaluated the risks related to water in Watersheds in the Entity's Area of Influence, via the Watershed Assessment Report and from the 'Novelis Inc. CDP Water Security Questionnaire 2022'. For more information refer to: https://www.novelis.com/wp-content/uploads/2022/12/Novelis-FY2022-Sustainability-Report.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risks related to the materiality of impacts on Biodiversity from land use and activities in the Entity's Area of Influence through an Ecological Footprint Report. The report provides a summary of the site's regional ecology.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has evaluated the risks of local activities on Biodiversity and appropriate and preventive action plans were developed in the Biodiversity Risk Assessment data sheet. The Entity's third party biodiversity assessment is used to develop future action plans with time-bound targets.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has evaluated the risks of local activities on Biodiversity and appropriate and preventive action plans were developed in the Biodiversity Risk Assessment data sheet. The Entity's third party biodiversity assessment is used to develop future action plans with time-bound targets.
8.2c Biodiversity management (reporting)	Conformance	The action plan developed demonstrates that the Entity has established positive impact actions for the improvement and conservation of Biodiversity. The

CRITERION	RATING	COMMENT
		Entity will publicly disclose outcomes in the next edition of the Sustainability Report.
8.3 Alien Species	Conformance	The Entity has developed a Biodiversity Action Plan that addresses the prevention of accidental or deliberate introduction of Alien Species that may have significant adverse impacts on biodiversity.
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 mines)	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 developed a commitment to Human Rights by adhering to the UN Global Compact in 2011 and through the Code of Conduct disclosed to all Workers and suppliers. For more information refer to: https://www.novelis.com/?s=code+of+conduct
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has developed the Environmental and Social Due Diligence process to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has developed the Environmental and Social Due Diligence process to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. The Entity does not demonstrate that it has caused or contributed to adverse impacts on Human Rights.
9.2 Women’s Rights	Conformance	The Entity has implemented a Working Committee to ensure respect for the rights and interests of women, in accordance with international standards, including the United Nations Convention on the Elimination of All Forms of Discrimination Against Women. For more information refer to: https://www.youtube.com/watch?v=erylpgRTVks The Entity is committed to increasing women in the workplace by 35%.

CRITERION	RATING	COMMENT
9.3 Indigenous Peoples	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure respect for the rights and interests of Indigenous Peoples, in accordance with international standards, including ILO Convention 169 and the United Nations Declaration on the Rights of Indigenous Peoples, after mapping the indigenous communities.
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	The Entity has implemented a Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure consultation and good faith cooperation with Indigenous Peoples when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated with and living on the relevant lands.
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has implemented a Land Acquisition, Resettlement and Livelihood Restoration Policy, relevant to when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated with and living on the relevant lands.</p> <p>The Entity in consultation with the affected Communities always cooperates to identify cultural or sacred heritage sites and values within the Area of Influence and take appropriate measures to avoid or remedy the impacts, as well as to guarantee continued rights of access to such sites or values.</p>
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has implemented a Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure that when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated and living on the relevant lands, viable alternatives are considered to avoid or minimise physical and/or economic displacement, while balancing environmental, social and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable, including women.
9.6b Resettlements (where unavoidable)	Conformance	The Entity has implemented a Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure that when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated and living on the relevant lands, viable alternatives are considered to avoid or minimise physical and/or economic displacement, while balancing environmental, social and financial costs and benefits, paying particular

CRITERION	RATING	COMMENT
		attention to impacts on the poor and vulnerable, including women.
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and in the use of natural resources.</p> <p>For more information refer to: https://www.novelis.com/about-us/community-outreach/</p> <p>Local Community initiatives include weekend food for children in food crises, assistance with housing, and hiring of recovering drug addicts.</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and in the use of natural resources.</p> <p>For more information refer to: https://www.novelis.com/about-us/community-outreach/</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and in the use of natural resources.</p> <p>For more information refer to: https://www.novelis.com/about-us/community-outreach/</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity has implemented the Novelis Supplier Code of Conduct and does not contribute to armed conflicts or Human Rights abuses in Conflict-Affected and High-Risk Areas. During the process of qualifying new suppliers, the Conflict Minerals Questionnaire is signed.</p> <p>For more information refer to: https://www.novelis.com/?s=code+of+conduct</p> <p>Novelis does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.</p>
9.9 Security practice	Conformance	<p>The Entity has a contracted and private security company, which respects the Human Rights of Workers in accordance with known security standards and good practices.</p>

CRITERION	RATING	COMMENT
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to freely associate in Labour Unions, seek representation and join Workers' Councils without interference and in compliance with the National Labor Relations Act of the USA. For more information refer to: https://www.nlr.gov/guidance/key-reference-materials/national-labor-relations-act
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to freely associate in Labour Unions, seek representation and join Workers' Councils without interference and in compliance with the National Labor Relations Act of the USA. For more information refer to: https://www.nlr.gov/guidance/key-reference-materials/national-labor-relations-act
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as local legislation does not restrict the right to Freedom of Association and Collective Bargaining, thus not requiring alternative means of Association for Workers.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights, where Child Labour must not be used nor condoned. For more information refer to: https://www.novelis.com/wp-content/uploads/2022/10/Novelis-Code-of-Conduct-October-2022-ENG.pdf
10.2b Child Labour (hazardous)	Conformance	The Entity has implemented and adhered to the UN Global Compact, which expresses the commitment to respect human rights, where Child Labour must not be used nor condoned. For more information refer to: https://www.novelis.com/wp-content/uploads/2022/10/Novelis-Code-of-Conduct-October-2022-ENG.pdf
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented and adhered to the UN Global Compact, which expresses the commitment to respect human rights, where Child Labour must not be used nor condoned. For more information refer to: https://www.novelis.com/wp-content/uploads/2022/10/Novelis-Code-of-Conduct-October-2022-ENG.pdf
10.3a Forced Labour (human trafficking)	Conformance	The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not engage in or support trafficking in persons directly or through any employment or recruitment agency.

CRITERION	RATING	COMMENT
		During the interviews with the workers, this information was confirmed.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers, directly or through employment or recruitment agencies. During the interviews with the workers, this information was confirmed.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to make deposits or deposit payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour and does not provide loans or hold Workers in debt bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace or in housing on the Entity's premises.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not keep original copies of Workers' identity documents, work permits, travel documents or training certificates. During the interviews with the workers, this information was confirmed.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny Workers the freedom to terminate their employment contract at any time, without penalty, upon reasonable notice. During the interviews with the workers, this information was confirmed.
10.4 Non-Discrimination	Conformance	The Entity has developed the Equal Employment Opportunity and Discrimination and Harassment Free Workplace Policies to ensure equal opportunities and not support Discrimination in the hiring, salary, promotion, training, promotion opportunities or termination of any Worker based on gender, race, nationality, social status, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age or any other condition that may give rise to discrimination. During the interviews with the workers, this information was confirmed.
10.5 Communication and engagement	Conformance	The Entity has developed the Equal Employment Opportunity and Discrimination and Harassment Free Workplace Policies to ensure open communication and direct engagement with Workers and their

CRITERION	RATING	COMMENT
		<p>representatives regarding working conditions and resolution of work and compensation issues, without threat of reprisal, intimidation or harassment. During the interviews with the workers, this information was confirmed.</p> <p>For more information refer to: https://www.novelis.com/sustainability/</p>
10.6 Disciplinary practices	Conformance	The Entity developed the Workplace Violence Prevention Program Standard to ensure that it does not engage in, nor tolerate the use of corporal punishment, mental or physical coercion, harassment and gender-based violence, including sexual harassment or verbal abuse of Workers.
10.7a Remuneration (living wage)	Conformance	The Entity has developed the Employee Compensation Standard to ensure Workers' rights to a minimum wage and that wages are paid monthly, and annually updated through the Hourly Wage Increase History Table, which must be sufficient to meet Workers' basic needs.
10.7b Remuneration (method of payment)	Conformance	All payments made to Workers are documented and paid in a timely manner (i.e. monthly).
10.8 Working Time	Conformance	The Entity has developed the Employee Compensation Standard to ensure Workers' rights to a working day that complies with local legislation, including overtime, holidays and paid annual vacation time.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity's Management System is certified to the ISO 45001 Standard, with the elaboration of an Integrated System Policy, approved by senior management and made available in the internal system and publicly disclosed on the Entity's website: https://www.novelis.com/cerifications
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Management System is certified to ISO 45001. All Workers are trained during the process of integration to work.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Management System is certified to ISO 45001, with the elaboration of an Integrated System Policy according to international standards and ILO Conventions on Occupational Health and Safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed several safety tools, including a 'Duty of Refusal' tool, in which employees have the duty to understand the dangers and safe practices of their work and the authority to refuse or

CRITERION	RATING	COMMENT
		interrupt unsafe work. For more information refer to: https://www.novelis.com/suppliers/safety-absolute
11.2 OH&S Management System	Conformance	The Entity has documented an Occupational Health and Safety Management System, which is ISO 45001 certified as per applicable national and international standards. For more information refer to: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
11.3 Employee engagement on health and safety	Conformance	The Entity's Workers participate in improving its culture of safety and awareness through their involvement in various committees. For more information refer to: https://www.novelis.com/suppliers/safety-absolutes/
11.4 OH&S performance	Conformance	The Entity assesses its performance in Occupational Health and Safety through indicators monitored by the Entity's Board, seeking to improve the continuous improvement of its practices through periodically revised tools.

Document Control and Version History

Revision	Date	Notes
0	25 October 2023	Initial Certification Audit - Full Certification.