

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# Novelis Deutschland GmbH Nachterstedt Werk

CERTIFICATE NUMBER

110

ASI STANDARD

PERFORMANCE  
STANDARD  
(V3 2022)

CERTIFICATION LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITING FIRM

SZI GmbH

DATE OF ISSUE

5 JANUARY 2024

DATE OF EXPIRY

4 JANUARY 2027

CERTIFIED SINCE

5 JANUARY 2021

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](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

All activities on the Nachterstedt  
Rolling (Germany) site to produce  
Aluminium products including cold  
rolling, heat treatment, coating and  
finishing.

# AUDIT REPORT PERFORMANCE STANDARD

## OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Deutschland GmbH Nachterstedt Werk
CERTIFICATION SCOPE	All activities on the Nachterstedt Rolling (Germany) site to produce Aluminium products including cold rolling, heat treatment, coating and finishing.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Semi-Fabrication</li><li>• Material Conversion</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 (30 January – 8 May 2020)</li><li>• Surveillance Audit (5 – 6 April 2022)</li><li>• Re-Certification and Scope Change Audit (27 – 28 September 2023)</li></ul>
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none"><li>• 30 January – 8 May 2020 (Initial Certification Audit)</li><li>• 5 – 6 April 2022 (Surveillance Audit)</li><li>• 27 – 28 September 2023 (Re-Certification and Scope Change Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 10 December 2020 (Initial Certification Audit)</li><li>• 24 March 2023 (Surveillance Audit)</li><li>• 30 December 2023 (Re-Certification and Scope Change Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (30 January – 8 May 2020)</u></p> <p>ASI requirements relevant for all processes applied in Nachterstedt Rolling facility. Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Semi-Fabrication</li><li>• Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (5 – 6 April 2022)</u></p> <p>The audit scope covers all processes applied in Nachterstedt Rolling facility. Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>• Semi-Fabrication</li><li>• Material Conversion (Production and Transformation)</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 (27-28 September 2023)</u></p> <p>The audit scope includes all processes applied in Nachterstedt Rolling facility. Supply chain activities included in the audit scope:</p>

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- Semi-Fabrication
  - Material Conversion (Production and Transformation)

All applicable 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

5 January 2024 - 4 January 2027

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NEXT AUDIT TYPE

Surveillance Audit

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NEXT AUDIT DATE

5 July 2025

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CERTIFICATE NUMBER

110



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 Novelis plant in Nachterstedt consists of a rolling mill and a recycling centre, the latter of which was built in 2014 and is one of the largest and most successful employers in Saxony-Anhalt, Germany. The plant covers 45,900m<sup>2</sup> on a total site footprint of 60,000m<sup>2</sup> and currently employs 226 people. It supplies semi-finished products (Aluminium ingots) to be further manufactured by Novelis into high-quality rolled aluminium products for automotive, can, industrial and construction markets worldwide. The recycling centre is dedicated to recycling used beverage cans and other scrap Aluminium. It is Europe's largest and most modern Aluminium recycling plant and can produce up to 400,000 tonnes of Aluminium sheet ingots from recycled material. It contributes to Novelis' ambitious sustainability goals and creates Aluminium solutions from a high percentage of recycled materials with a low carbon footprint.

The Recycling site operates an end-to-end process (shredding, sorting, melting and casting) with a feedstock from up to 18 different scrap types across all market segments. On-site technology utilises regenerative burners for the melting furnaces and some electrical energy is generated by an Organic Rankine Cycle (ORC) that creates heating for the building from useable-waste heat. Logistics solutions consist of a highly efficient reloading trailer park system for incoming goods and a full train-based system for outbound transport.

Situated in a largely rural area, Novelis Nachterstedt is actively involved in local activities in cooperation with schools and universities to promote interest in science and technology. The Entity offers internships in all departments and supports students with their university theses or college projects. The Entity is also known for its ongoing support of safety education provided for children at kindergarten provided by the local fire department. Many employees are also volunteers at the local fire brigades as firefighters and youth trainers at sports clubs.

## 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>	High			

## FINDINGS

CRITERION	RATING	COMMENT
<b>1. BUSINESS INTEGRITY</b>		
1.1 Legal Compliance	Conformance	The Entity has implemented a thorough process to constantly maintain awareness of, and ensure Compliance with the latest Applicable Law. A cadastre (Kataster) of the Applicable Law is available, up to date and relevant personnel have received training.
1.2 Anti-Corruption	Conformance	Anti-Corruption is regulated at the Entity and Novelis Group specifications are implemented at all business levels, with training provided.
1.3a-e Code of Conduct	Conformance	The Novelis Code of Conduct is implemented, and training is provided at the Entity. Suppliers must comply with a Supplier Code of Conduct. Both documents are publicly disclosed at: <a href="https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf">https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</a> <a href="https://www.novelis.com/wp-content/uploads/2023/12/Novelis-Supplier-Code-of-Conduct-ENG-2023.pdf">https://www.novelis.com/wp-content/uploads/2023/12/Novelis-Supplier-Code-of-Conduct-ENG-2023.pdf</a>
<b>2. POLICY AND MANAGEMENT</b>		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity's Environment, Health, Safety and Quality (EHSQ) Policy is communicated both internally and externally. Communication internally is managed through annual training and announcements. External communication is via the Novelis website. In accordance with the ASI Performance Standard as well as their EHSQ Policy, 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 Deutschland GmbH CEO has corporate responsibility and authority to ensure conformance with the ASI Performance Standard. The Entity has a legal group of individuals who have been nominated for having overall responsibility and authority to ensure Conformance with the ASI Performance Standard at the Entity level.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an Integrated Management System according to IATF 16949 incl. 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 an Environmental Management System that has been certified according to ISO 14001:2015. Furthermore, the Entity has assessed their Management System towards social aspects. Internal social (according to ISO 26000) and compliance audits are undertaken regularly.
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy addressing environmental, social and governance issues. The Entity has implemented a Code of Conduct and a Supplier Declaration that covers environmental, social and governance issues:

CRITERION	RATING	COMMENT
		<p><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></p> <p>Major suppliers must sign the declaration and complete the supplier self-declaration. Suppliers are regularly assessed.</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	As part of the internal risk assessments, influencing factors such as environment, social, and Human Rights are recorded and evaluated in the context of New Projects and system changes. No New Projects or Major Changes to existing Facilities have taken place 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) and the Entity has established systems to manage this effectively.
2.6a-h Human Rights Impact Assessment	Conformance	As part of the internal risk assessments, influencing factors such as environment, social, and Human Rights are recorded and evaluated in the context of New Projects and system changes. No New Projects or Major Changes to existing Facilities have taken place 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) and the Entity has systems in place to manage this effectively.
2.7a-f Emergency Response Plan	Conformance	The Entity has an implemented and trained Emergency Response Plan. External Stakeholders including the community and authority are involved. Regular training sessions are held with the local firefighters, the Community and Workers.
2.8a-d Suspended Operations	Conformance	The Entity has implemented a Business Resilience Plan. All involved parties have received training and exercises like evacuation or fire drill are conducted frequently. A software application has been introduced to support responsible persons in case of an unexpected emergency, breakdown, fire or accident with all necessary documents and contact information.
2.9a-b Mergers and Acquisitions	Not Applicable	This Criterion is not applicable to the Entity as acquisitions and mergers are executed and managed by Novelis Headquarters and accompanied by a Due Diligence process and supported by external specialists to reflect environmental, social and governance issues.
2.10a-b Closure, Decommissioning and Divestment	Not Applicable	This Criterion is not applicable to the Entity, as closure, decommissioning and divestment processes are managed by Novelis Headquarters rather than at a local level.
<b>3. TRANSPARENCY</b>		
3.1a-b Sustainability Reporting	Conformance	The Entity is incorporated in the Novelis Group Sustainability Reporting programme. The Group publicly discloses its governance approach and its Material environmental, social and economic impacts 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>

CRITERION	RATING	COMMENT
3.2 Non-compliance and Liabilities	Conformance	The Entity is incorporated in the Novelis Global Sustainability Reporting programme. Entity-specific information on significant fines, judgments, penalties and non-monetary sanctions is published by the district government. Public access is ensured via the EU Directive 2003/4/EC executed as the Environmental Information Act (UIG) in Germany.
3.3a-c Payments to Governments	Conformance	The Entity complies with strict 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 includes requirements where payments are made to authorities. Payments to Governments are not allowed, and every employee is trained on the Code of Conduct annually.  Code of Conduct: <a href="https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf">https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</a>  Supplier Code of Conduct: <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>
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: 0800-180-6638). Claims can be submitted via the contact formula: <a href="https://de.novelis.com/contact">https://de.novelis.com/contact</a>
<b>4. MATERIAL STEWARDSHIP</b>		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has prepared Life Cycle Assessments (LCA) for all product groups through the use of the Sphera software tool, consistent with the requirements of ISO 14040.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has contributed Life Cycle Inventory (LCI) data to regional initiatives (e.g., Aluminium Association and European Aluminium Sustainable Development Indicators). LCAs are delivered to customers for their products upon request (they include the cradle-to-gate process). LCAs are available for the relevant Aluminium containing products as well as for standard products. Relevant data can be accessed via the European Aluminium Sustainable Development Indicators: <a href="https://european-aluminium.eu/members/novelis">https://european-aluminium.eu/members/novelis</a>
4.2 Product Design	Conformance	When developing new products, the topic of sustainability is considered and a new LCA is undertaken. However, the Entity has no direct design responsibility for its products.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a process to minimise Aluminium Process Scrap and it has been minimised over the past few years. 100% of the scrap is recycled and reused internally. The Entity has implemented a closed-loop production, and Aluminium alloys and grades are recorded separately and recycled according to type.
4.4a-c Collection and Recycling of Products at End of Life - Material	Conformance	The Entity has established an Aluminium recycling strategy. The set goals are fulfilled and as a result, there is a continuous increase in the recycling rate. Novelis is actively engaged in European initiatives or groups that support and improve national collection rates. The

CRITERION	RATING	COMMENT
Conversion and other Manufacturing		recycling strategy is included in the 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>
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has established an Aluminium recycling strategy. The set goals are fulfilled and thus a continuous increase in the recycling rate is aimed for. Novelis is actively engaged in European initiatives or groups that support and improve national collection rates.
<b>5. GREENHOUSE GAS EMISSIONS</b>		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity is part of the International Greenhouse Gas Trade Environment, health and safety (EHS) data including energy consumption, emissions, waste data and water consumption are presented in working areas (shopfloor). Detailed Greenhouse Gases (GHG) emissions information is presented in the Novelis Global 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>  The GHG emissions data were identified and verified independently by PriceWaterhouseCoopers (PwC).
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 the initiatives and activities to achieve a 2050 goal of carbon neutrality in their Decarbonisation Strategy. Activities to reduce GHG emissions have been targeted, planned and ongoing for several years. Results are tracked and published annually, detailed information is presented 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>
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented an ISO 50001 Certified Management System and is audited annually. Projects to reduce GHG emissions are described and implemented, and projects are tracked on plant and regional levels.
<b>6. EMISSIONS, EFFLUENTS AND WASTE</b>		
6.1a-f Emissions to Air	Conformance	Emissions to Air that may have adverse effects on humans and the environment are measured to ensure limits are met under German



CRITERION	RATING	COMMENT
		law and have been reported in line with the operational permit of the Entity. Emissions are monitored and reduced continuously.
6.2a-g Discharges to Water	Conformance	Discharges to Water that may have adverse effects on humans and the environment and contamination of water must be reported to the authority (Lower Water Authority) in accordance with the Water Resources Act and permits without delay. Discharges to Water and the risk of discharge to soil are subject to the environmental goals published in the report to the Emissions Protection Officer (EHS Manager).
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. Additionally, regular internal audits are conducted to verify 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 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 and tested, and there are regular visits by the district government. There have been no reportable Spills inside or outside the plant since ISO 14001 was implemented in 2014. Documentation of regular visits by the district government is available.
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste management strategy. Waste management goals are achieved, and a reduction of the Waste streams has been identified. The Entity's Waste Management Strategy has been completed in accordance with the Waste Mitigation Hierarchy.</p> <p>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://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></p>
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	<p>The Entity monitors its water usage according to local regulations. An overview of the water withdrawals, various uses and the different wastewater flows are described and regularly reviewed. The Entity's water use is publicly disclosed in the appendix of the annual 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></p> <p>The Entity has assessed its water-related risks and implemented prevention measures accordingly in their Area of Influence. Water-related risks are identified as low.</p>

CRITERION	RATING	COMMENT
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as water-related risks are identified as low. The Entity has implemented targets for its water management. These targets are regularly reviewed during authority visits as well as during the annual Environmental Management System review.
<b>8. BIODIVERSITY AND ECOSYSTEM SERVICES</b>		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted an environmental risk assessment including an assessment of Biodiversity impacts which covers the entire Entity's Area of Influence. No risks are identified.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as there are no Material Biodiversity impacts identified in the risk assessment. If required, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as there were no Material Biodiversity impacts identified in the risk assessment. If required, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as there were no Material Biodiversity impacts identified in the risk assessment. If required, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.4 Alien Species	Conformance	The Entity has implemented 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	Not Applicable	This Criterion is not applicable to the Entity, there are no World Heritage sites in the operating environment of the Entity.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, the Entity has identified there are no Protected Areas within the Area of Influence according to the State Administration Office website.
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 several Gender-Responsive 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. The Entity has published a Letter of Commitment to the UN Global Compact, available at: <a href="https://ungc-">https://ungc-</a>

CRITERION	RATING	COMMENT
		<a href="https://production.s3.us-west-2.amazonaws.com/attachments/Organization/129081/original/Novelis_Inc_-_Letter_of_Recommitment.pdf?1542995069">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. The People Respecting Our Unique Diversity (PROUD) initiative was introduced and published. 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">https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf</a>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
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 does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion does not apply to the Entity, as no sacred or cultural heritage sites or values within the Entity's Area of Influence are present. Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion does not apply to the Entity, as no sacred or cultural heritage sites or values within the Entity's Area of Influence are present. Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion does not apply to the Entity, as no further expansion of the Entity is planned. No resettlements are being considered nor taking place during the period since joining ASI or are expected to occur during the Certification Period.
9.7a-h Affected Populations and Organisations	Conformance	The Entity does not claim any resources that could lead to a lack of resources in the area and among its population. The Entity respects the neighbourhood, the community, and all other interest groups located in the vicinity of the site. An evaluation of the interested parties has been conducted. The Novelis Group requires each of its sites to engage with Local Communities. The Entity regularly participates in public community events.
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented strict procedures to ensure it does not contribute in any way to Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has introduced Management Systems that are audited annually by an external certification body,

CRITERION	RATING	COMMENT
		<p>also internal audits are conducted. To become a Novelis supplier, the supplier must accept the Supplier Code of Conduct and confirm that it complies with the rules as prescribed. Through the Supplier Code of Conduct, the Entity undertakes supplier audits or inspections, and requests self-assessments to ensure supplier compliance.</p> <p>Supplier Code of Conduct: <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></p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity monitors its suppliers through different topics within the Supplier Code of Conduct. These are rated and assigned one total risk number. The calculated risk number informs the Entity whether they have to react or not. Suppliers can be blocked if necessary.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Supplier Code of Conduct allows the Entity to conduct audits or inspections, they also request self-assessments to ensure supplier compliance. The Entity monitors its suppliers with information provided to the supplier in an annual supplier evaluation. Risks are recognised at an early stage, allowing the Entity to react on an 'as needs' basis.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity has implemented procedures to ensure it does not contribute in any way to Human Rights abuses in CAHRAs and internal audits are conducted to confirm the effectiveness of Due Diligence practices.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	Annual management reporting of responsible sourcing activities 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 performs most security functions however 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 has implemented the collective agreement for the metallurgy sector. Most Workers have joined a trade union and there is an elected Workers' Council. No infringement on Freedom of Association and Right to Collective Bargaining has ever been reported.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the Entity operates in Germany where the rights of Workers are fully respected and the Entity respects Freedom of Association without interference.
10.2a Child Labour	Conformance	The Entity has implemented policies and follows local regulations to avoid the hiring of Child Labour. The Entity has strict control over any potential Child Labour, Young Workers are employed for vocational education purposes only and if at all, work with hazardous substances only occurs under supervision. The Entity does neither use nor support

CRITERION	RATING	COMMENT
		the use of Child Labour and does not engage in or support the Worst Forms of Child Labour.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour and Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and document review.</p> <p>However, it has been identified the Entity does not have a stand-alone Modern Slavery Statement.</p>
10.4a-c Non-Discrimination	Conformance	The Entity has established Policies and internal standards that ensure equal opportunity and prohibits any form of Discrimination in the recruitment process, salary, promotion, training, advancement opportunities, or termination of any Worker. Discrimination on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination is strictly prohibited. This has been confirmed through interviews and document review.
10.5 Communication and engagement	Conformance	The Entity has established a Code of Conduct, as well as several independent procedures for resolving complaints. It has been verified through interviews and document review that the Entity ensures open channels of communication and engages directly with Workers and their representatives to address workplace and compensation issues without fear of retaliation, intimidation, or harassment.
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 regarding Violence and Harassment including sexual harassment, or verbal abuse of Workers. This was confirmed through interviews with the Works Council and document review. Culture workshops are conducted for all levels of employees.</p> <p>It has been identified the Harassment Policy is available but not publicly disclosed.</p>
10.7a-c Remuneration	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard. Working Time, payment and leave are negotiated in Collective Bargaining agreements. The wages paid are substantially above the legal minimum and are aligned with the industry standard. As verified by document review and interviews during the assessment, the Entity's wage payments are timely, in legal tender and fully documented.
10.8a-c 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 has been implemented and records are maintained.
10.9a-b Informing Workers of Rights	Conformance	The Entity's employees are informed via various media channels and are invited to open meetings by the Works Council for regular updates. Additionally, there is a complaint management system which is available for all Workers.

CRITERION	RATING	COMMENT
<b>11. OCCUPATIONAL HEALTH AND SAFETY</b>		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented a Health and Safety Management System, which is certified to ISO 45001:2018. Internal and external audits are conducted to confirm the effectiveness of the system and any identified non-conformances are actioned.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>The Wirtschaftsvereinigung Metalle (WVMetalle), (the German Metals Federation), analyses the Occupational Health and Safety (OH&amp;S) data provided by the Entity every year and publishes annual statistics for the metals sector. The Entity has a reportable accident rate (per 1,000,000 hours) that is five times lower than the average rate. Lagging and leading indicators tracked include accidents, safety-instrumented functions, near misses, the number of leadership tours, safety training completed, and BBS statistics. The data is available at: <a href="https://www.wvmetalle.de">https://www.wvmetalle.de</a></p> <p>Further information on the effectiveness of the OH&amp;S Management System is included in the 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></p> <p>However, it has been identified that the leading indicators are not publicly disclosed.</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity's employees are involved in the preparation of risk assessments and Safety Officers attend OH&S Committee meetings held quarterly. Accidents are reported both internally and externally to relevant parties.

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#### DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	5 January 2021	Initial Certification Audit – Full Certification
1	26 April 2023	Surveillance Audit
2	5 January 2024	Re-Certification and Scope Change Audit from Performance Standard V2 to V3.