

CASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis Switzerland SA

CERTIFICATE NUMBER

111

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

RE-CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

SZI GMBH

DATE OF ISSUE

28 FEBRUARY 2024

DATE OF EXPIRY

27 FEBRUARY 2027

CERTIFIED SINCE

12 JANUARY 2021

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

CERTIFICATION SCOPE

All activities on the Novelis Sierre
(Switzerland) site to produce
Aluminium products including
casting, scalper, hot rolling, cold
rolling, continuous heat treatment,
finishing and laser blanking

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Switzerland SA
CERTIFICATION SCOPE	All activities on the Novelis Sierre (Switzerland) site to produce Aluminium products including casting, scalper, hot rolling, cold rolling, continuous heat treatment, finishing and laser blanking.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (25 – 26 May 2020)Surveillance Audit (8 November 2022)Re-Certification and Scope Change Audit (5 – 6 December 2023)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">25 – 26 May 2020 (Initial Certification Audit)8 November 2022 (Surveillance Audit)5 – 6 December 2023 (Re-Certification and Scope Change Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">5 December 2019 (Initial Certification Audit)3 May 2023 (Surveillance Audit) (Re-Certification Audit and Scope Change)17 January 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (6 May – 17 June 2020)</u> The audit scope includes all activities at the Sierre site.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (29 – 30 March 2022)</u> The audit scope included all activities at the Sierre site.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-Fabrication

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

Re-Certification & Scope Change Audit (5 – 6 December 2024)

The audit scope included all activities at the Sierre site.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

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

AUDIT OUTCOME Re-Certification

AUDIT METHODOLOGY DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
 - The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 21 February 2024 – 20 February 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 21 August 2025

CERTIFICATE NUMBER III



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.

ENTITY OVERVIEW

Novelis' Sierre site is located in the Valais region of Switzerland, employing more than 500 people. Novelis' Sierre, Switzerland, plant features a fully integrated system, covering the entire process from casting to finishing. In addition to hot and cold rolling mills, the plant operates a state-of-the-art continuous annealing line and has laser-cutting capability. The plant also hosts a world-leading Research & Innovation Center, specialised in the development of new automotive sheet alloys, surface treatment and joining technologies.

Novelis Inc. is a company that is driven by its purpose to shape a sustainable world together. It is a global leader in innovative products and services and the world's largest recycler of Aluminium. Novelis partners with customers in the aerospace, automotive, beverage can and specialities industries to deliver solutions that maximise the benefits of lightweight Aluminium throughout North America, Europe, Asia, and South America. Novelis is a subsidiary of Hindalco Industries Limited, an industry leader in Aluminium and copper, and the metals flagship company of the Aditya Birla Group, a multinational conglomerate based in Mumbai, India.

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
SYSTEMS	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL		HIGH		

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
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.
1.2 Anti-Corruption	Conformance	The topic of Anti-Corruption is regulated at the Entity. Novelis Group specifications are trained and implemented at all business levels.
1.3a-e Code of Conduct	Conformance	The Novelis Code of Conduct is implemented and trained at the Entity. Suppliers must comply with a Supplier Code of Conduct. Both documents are publicly disclosed at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf https://www.novelis.com/wp-content/uploads/2023/12/Novelis-Supplier-Code-of-Conduct-ENG-2023.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Minor Non-Conformance	The Entity's Environment, Health, Safety and Quality (EHSQ) Policy is communicated both internally and externally. Internal communication is ensured through annual training and announcements. The external communication is delivered 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 regularly reviews the Policies. The Entity has obtained ISO 14001, ISO 50001 and ISO 45001 certifications which are consistent with their ASI Certification Scope. The Novelis EHSQ Policy is continuously communicated both internally and externally. Internal communication is ensured through annual training and announcements. The EHSQ Policy is publicly disclosed at: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf The last revision of the EHSQ Policy was in 2016 and must be renewed.
2.2a-c Leadership	Conformance	The Novelis CEO has corporate responsibility and authority to ensure conformance with the ASI Performance Standard. A senior Management Representative has been nominated at the Entity level for having overall responsibility and authority for ensuring conformance with this Standard.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented both an Environmental Management System according to ISO 14001 and an Energy Management System according to ISO 50001. 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 implemented and fulfils the requirements of a Social Management System (SA 8000). Internal social and compliance audits are undertaken regularly.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Not Applicable	<p>The Entity has implemented a Responsible Sourcing Policy covering environmental, social and governance issues. The Entity has implemented a Code of Conduct and a supplier declaration that covers environmental, social and governance issues: https://www.novelis.com/wp-content/uploads/2023/12/Novelis-Supplier-Code-of-Conduct-ENG-2023.pdf</p> <p>Key suppliers have provided a signed declaration and completed a supplier self-declaration. Suppliers are regularly assessed.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as 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 (Switzerland), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorisation process (including Human Rights), and the Entity has implemented systems to manage this.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, 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 (Switzerland), where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorisation process (including Human Rights) and the Entity has implemented systems to manage this.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented and provided training on the Emergency Response Plan. External Stakeholders including the Local Community and authority are involved. Regular training with local firefighters, the Community and Workers is undertaken.</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has implemented a Business Resilience Plan. All involved parties are regularly trained and exercises such as evacuations or fire drills. A software application has been introduced to support responsible persons in case of an emergency, breakdown, fire or accident with all necessary documents and contact information.</p>
2.9a-b Mergers and Acquisitions	Not Applicable	<p>This Criterion is not applicable to the Entity, as acquisitions and mergers are executed by Novelis Corporate Headquarters and accompanied by a Due Diligence process and supported by external specialists to reflect environmental, social and governance issues.</p>
2.10a-b Closure, Decommissioning and Divestment	Not Applicable	<p>This Criterion is not applicable to the Entity, as closure, decommissioning and divestments are not managed at the local Entity level but by Novelis Corporate Headquarters. There have been no closure, decommissioning or divestment plans since the Entity joined ASI. The Entity systematically reviews environmental, social and governance issues as part of the Entity's planning process.</p>
3. Transparency		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity is part of the Novelis Group Sustainability Reporting. The Group publicly disclosed its governance approach and its Material environmental, social and economic impacts in the Novelis Global Sustainability Report: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-</p>

CRITERION	RATING	COMMENT
		2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability
3.2 Non-compliance and Liabilities	Conformance	<p>The Entity is part of the Novelis Global Sustainability Report. 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).</p> <p>Novelis Global Sustainability Report, page 57: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability</p>
3.3a-c Payments to Governments	Conformance	The Entity complies with the strict local legislation and has implemented Policies and procedures to prevent Corruption. The detailed behaviours are described in the Novelis Code of Conduct and include the requirements where payments are made to authorities.
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 have implemented a process for claim handling. A whistleblowing hotline has been established (Novelis Ethics Hotline: 0800-180-6638). Claims can also be communicated via: https://de.novelis.com/contact
4. Material Stewardship		
4.1a Environmental Life Cycle Assessment	Conformance	In cooperation with an external consultant, Life Cycle Assessments (LCA) have been conducted for the Entity's standard and special Products using the Sima Pro software. The requirements of ISO 14040 are fulfilled.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity contributes Life Cycle Inventory (LCI) data to regional initiatives such as the Aluminium Association and European Aluminium Sustainable Development Indicators (SDI). LCAs, which are cradle-to-gate, are delivered to customers for their Products upon request. The LCAs are available at the European Aluminium SDI: https://european-aluminium.eu/members/novelis
4.2 Product Design	Conformance	The Entity does not have the responsibility to design products. However, when developing new products, sustainability is considered, and a new LCA is undertaken.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has implemented a working Scrap Management Procedure. Aluminium Process Scrap is reduced to a minimum, when scrap is generated, it is 100% recycled or reused.</p> <p>There is a closed-loop production. Aluminium alloys and grades are recorded separately and recycled according to type.</p>
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.

CRITERION	RATING	COMMENT
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has implemented an Aluminium recycling strategy. The established goals are fulfilled and thus a continuous increase in the recycling rate is aimed. Novelis is actively engaged in European initiatives or groups that support and improve national collection rates. More information on Entity's recycling strategy and rates can be found at: https://www.novelis.com/wp-content/uploads/2023/05/Novelis-Recycled-Content-Whitepaper.pdf
5. Greenhouse Gas Emissions		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity is not part of the International Greenhouse Gas Trade. However, the environment, health and safety (EHS) figures such as energy consumption, emissions, waste numbers and water consumption are visible in working areas (shopfloor). Detailed Greenhouse Gases (GHG) emissions information is presented in the Novelis Global Sustainability Report: https://www.novelis.com/sustainability/scaling-circularity
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 implemented environmental activities to reduce energy consumption and GHG emissions and has been ongoing for several years. The objective is for zero CO ² emissions by 2030. Detailed information is presented in the Novelis Global Sustainability Report: https://www.novelis.com/sustainability/scaling-circularity
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented ISO 50001 certified Management Systems and undergoes a yearly Certification audit. Projects to reduce GHG emissions are described and running and are tracked at the plant and regional levels.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	Emissions to Air are under tight control according to local regulations and permits; the limits are met, and the emissions are monitored, controlled and reduced constantly.
6.2a-g Discharges to Water	Conformance	Any contamination of water has to be reported to the authority in accordance with the Water Resources Act and permits without delay. Discharges to Water that have adverse effects on humans and the environment are controlled under Swiss law and comply with the Entity's operating permit. To ensure compliance, routine water monitoring is undertaken. Also, Discharges to Water and emissions to the soil are subject to environmental goals and are published in the Emission Protection Officer (EHS Manager) report.

CRITERION	RATING	COMMENT
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 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, trained and tested. There have been no reportable Spills inside and outside the plant since ISO 14001 was implemented. The reporting of Spills is regulated, trained and tested. There are regular visits by the state environmental authorities.
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste Management Strategy. The goals in the field of waste management have been fulfilled. A reduction of the waste streams is recognisable. The Entity's Waste Management Strategy has been completed in accordance with the Waste Mitigation Hierarchy.</p> <p>The relevant authority may, if necessary, request the report from the Waste Officer. Regular monitoring by the district government verifies compliance with legal requirements. 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: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability</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	Conformance	100% of the white Dross is recycled internally. After treating the black Dross with argon and cooling it down to stop the oxidation process, the Entity sends it to an external local Contractor who treats the Dross and returns it back to Novelis in the form of Aluminium bars.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity monitors its water usage according to local regulations. An overview of the water entrances, the various consumers and the different wastewater flows are described and regularly reviewed.</p> <p>The Entity has assessed its water-related risks and implemented prevention measures accordingly in its Area of Influence. Water usage by source and type is publicly disclosed in the Novelis Sustainability report in the Appendix. https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, water-related risks are identified as low.

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted Environmental risk assessments as part of approval procedures. The risk assessment covers the Area of Influence of the Entity, including an assessment of Biodiversity impacts.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as there were no Material Biodiversity impacts identified in the risk assessment. If necessary, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
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 necessary, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Issues of Biodiversity are also subject to the operating permit, there are no open measures. Even though no Material impact has been identified, actions were taken to prevent Biodiversity impacts.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as there were no Priority Ecosystem Services and Material Biodiversity impacts identified in the risk assessment. If necessary, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.4 Alien Species	Conformance	The Entity has taken 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 plant's operating environment of the Entity.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity; there are no Protected Areas within the 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.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>Novelis publicly subscribes to the United Nations Guiding Principles and has issued and communicated both its Code of Conduct (Promote a Desirable Work Environment) and Supplier Code of Conduct (Labour & Human Rights), which includes a commitment to respect Human Rights. The Codes can be accessed at:</p> <p>Code of Conduct: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p> <p>Supplier Code of Conduct: https://www.novelis.com/wp-content/uploads/2022/07/Novelis-Supplier-Code-of-Conduct-ENG-07262022.pdf</p>

CRITERION	RATING	COMMENT
		The Entity has examined the Human Rights requirements within its Area of Influence with a focus on a 'preventive approach' to identify legal issues in advance. The local compliance assessment (acc. SA8000) has confirmed that there are no salient adverse Human Rights impacts present at the Entity.
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to women's rights requirements. During the site tour, interviews and document review, no indication of deliberate Discrimination against women was observed. Novelis has identified the need to overcome the historical disadvantage of women as one of its priorities and has established the Woman in Novelis (WiN) program, which aims to motivate, retain and develop all employees, with a focus on building and celebrating a diverse culture that includes female employees.</p> <p>All the initiatives and results are communicated in the Novels Global Sustainability Report: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability</p>
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 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 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 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 and values within the Entity's Area of Influence are present. Indigenous Peoples or their lands, territories and resources are not 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 and values within the Entity's Area of Influence are present. 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 does not apply to the Entity, as to date there is no planned expansion of the plant which may lead to displacement.
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 the population. The Entity respects and is sensitive to the neighbourhood, the community and all other interest groups in the vicinity. An evaluation of the interested parties

CRITERION	RATING	COMMENT
		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.
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	<p>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. The Entity has introduced Management Systems that are audited annually by an external certification body, 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 its rules. 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: https://www.novelis.com/wp-content/uploads/2023/12/Novelis-Supplier-Code-of-Conduct-ENG-2023.pdf</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity monitors its suppliers in one system, different topics from the Supplier Code of Conduct are part of this system and will be rated and one risk number is calculated. The calculated risk number informs the Entity if 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: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity mainly 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.
10. Labour Rights		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	The Entity respects the local regulations on Workers' rights and has implemented the collective agreement for the metallurgy sector. All Workers are free to join any local union organisations. No infringement on Freedom of Association and Right to Collective Bargaining has ever been reported.

CRITERION	RATING	COMMENT
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	This Criterion is not applicable, as the Entity operates in Switzerland where the rights of Workers are fully respected, and the Entity respects the Freedom of Association without interference.
10.2a Child Labour	Conformance	The Entity has implemented Policies and local regulations to avoid the hiring of Child Labour. The Entity has strict control over any potential Child Labour, and Young Workers are employed for vocational education only and if at all, work with hazardous substances only occurs under supervision. The Entity does neither use nor support 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. The Entity does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and document review.</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 prohibit any form of Discrimination in the recruitment process, salary, promotion, training, advancement opportunities, or termination of any Worker. Discrimination 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 is strictly prohibited. This has been confirmed through interviews and document review.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, 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. The Entity does neither 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. This was confirmed by interviews with the Works Council and document review. Culture workshops are conducted for employees at all levels.</p> <p>However, 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, as confirmed by document review and Worker interviews. Working Time, payment and leave are negotiated in Collective Bargaining Agreements. The wages paid are substantially above the legal minimum and they are in line with the industry standard.

CRITERION	RATING	COMMENT
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 is implemented, and records are maintained.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs their employees via different media channels. The Works Council invites all employees to regular public meetings for updates and information. Additionally, there is a complaint Management System which is available for all Workers.
11. Occupational Health and Safety		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an ISO 45001:2018 Certified OH&S Management System in accordance with ISO 45001: 2018. Any identified non-conformances are actioned by the Entity. Internal and external audits are conducted to confirm the effectiveness of the system.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>Suva, the Swiss National Accident Insurance Fund Analyses Occupational Health and Safety (OH&S) data and publishes an annual statistic for the metals sector. In the area of reportable accidents (per 1,000,000 hours), examples of lagging indicators that are tracked are accidents, safety-instrumented functions, near misses etc and leading indicators tracked are the number of leadership tours, number of near misses, completed safety training, BBS statistics etc.</p> <p>However, it was identified 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 assessment and Safety Officers have a mandate to attend the OH&S Committee which is held four times a year.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	12 January 2021	Initial Certification Audit
1	22 May 2023	Surveillance Audit
2	28 February 2024	Re-Certification & Scope Change Audit from Performance Standard V2 to V3.
