

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NOVELIS UK LTD (LATCHFORD)

CERTIFICATE
NUMBER

125

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

SZI GmbH

DATE OF ISSUE

31 MARCH 2022

DATE OF EXPIRY

30 MARCH 2025

CERTIFIED SINCE

31 MARCH 2021

AUTHORISED BY

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

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

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

CERTIFICATION SCOPE

All activities on the Latchford site (United Kingdom)
to produce Aluminium products including
shredding, decoating, melting and casting.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis UK Ltd (Latchford)
CERTIFICATION SCOPE	All activities on the Latchford site (United Kingdom) to produce Aluminium products including shredding, decoating, melting and casting.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-Melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (18 – 19 January 2021)Surveillance Audit (29 November 2021)Surveillance Audit (12 -14 February 2024)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">18 January – 6 March 2021 (Initial Certification Audit)29 November 2021 (Surveillance Audit)12 -14 February 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">18 March 2021 (Initial Certification Audit)10 June 2022 (Surveillance Audit)3 June 2024 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (18 – 19 January 2021)</u></p> <p>The audit scope includes all activities on the Latchford site to produce Aluminium products including shredding, decoating, melting and casting.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-Melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (January – March 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been</p>

undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Surveillance Audit (29 November 2021)

The audit scope includes all activities on the Latchford site to produce Aluminium products including shredding, decoating, melting and casting.

Supply chain activities included in the Audit Scope:

- Aluminium Re-Melting/Refining
- Casthouses

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (12 -14 February 2024)

The audit scope includes all activities on the Latchford site to produce Aluminium products including shredding, decoating, melting and casting.

Supply chain activities included in the Audit Scope:

- Aluminium Re-Melting/Refining
- Casthouses

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

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

CERTIFICATION
PERIOD

31 March 2022 – 30 March 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

30 March 2025

CERTIFICATE
NUMBER

125

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the ASI Performance Standard's legal compliance requirements. There are systems in place to maintain awareness of and ensure compliance with Applicable Law. The Entity holds ISO 14001, ISO 50001, ISO 45001, and ISO 9001 certifications from accredited certification bodies.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, consistent with Applicable Law and prevailing international standards. Among the instruments, a Code of Conduct is issued and communicated internally and externally. The Entity has provided training to employees with regard to business ethics. Corporate Headquarters operates a whistleblowing hotline where potential breaches or suspected Corruption can be reported confidentially.
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles relevant to Environmental, Social and Governance performance. The Novelis Group Code of Conduct is available at https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf The Supplier Code of Conduct is available at: https://www.novelis.com/wp-content/uploads/2023/12/Novelis-Supplier-Code-of-Conduct-ENG-2023.pdf The Ethics Hotline: https://app.convercent.com/en-US/Anonymous/IssueIntake/LandingPage/918012dd-5b57-ee11-a9a3-000d3ab9f062
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Novelis Group Environment, Health, Quality, Safety (EHQS) Policy is communicated internally via annual training and informational announcements. The Policy is available to external Stakeholders at: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has senior management endorsement and support through the provision of resources and

CRITERION	RATING	COMMENT
		regularly reviews its Policies. The Entity has obtained ISO 14001, ISO 9001, and ISO 45001 certifications.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Novelis EHQS Policy is communicated internally via annual training and informational announcements. The Policy is available to external Stakeholders at: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
2.2 Leadership	Conformance	The Novelis Chief Executive Officer (CEO) has the corporate responsibility and authority to ensure conformance with the ASI Performance Standard. The Entity's Legal ASI Compliance Officer has the overall responsibility and authority to ensure conformance with the ASI Performance Standard at the site level.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an Environmental Management System certified in accordance with ISO 14001.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has established an Environmental Management System certified in accordance with ISO 14001:2015. The Entity has implemented and fulfilled the requirements of an SA 8000 Social Management System.
2.4 Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy at a Group level that addresses Environmental, Social and Governance issues. The Entity has also implemented the Supplier Code of Conduct, available at: https://www.novelis.com/wp-content/uploads/2023/12/Novelis-Supplier-Code-of-Conduct-ENG-2023.pdf
2.5 Impact Assessments	Conformance	The Entity has implemented systems to conduct internal risk assessments on environmental, social and Human Rights factors with respect to New Projects and system changes. However, there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. The site is located in a highly regulated country where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorisation process (including Human Rights). The Entity has systems in place to manage this effectively.

CRITERION	RATING	COMMENT
2.6 Emergency Response Plan	Conformance	The Entity has implemented an Emergency Response Plan. External Stakeholders including the community and authorities are involved in regular reviews of the plan. Regular training with the local firefighters, the community and Workers is undertaken.
2.7 Mergers and Acquisitions	Conformance	The Entity has a Due Diligence process and is supported by external specialists to reflect environmental, social and governance issues for acquisitions executed by Novelis Headquarters.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity systematically reviews environmental, social and governance issues as part of the Entity's planning process. Closure, decommissioning, and divestment are managed at the Corporate level. There has been no closure, decommissioning or divestment activities at the Entity since joining ASI.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity is incorporated within the Novelis Group Sustainability Reporting framework. The Group publicly discloses its governance approach and its Material environmental, social, and economic impacts: https://www.novelis.com/wp-content/uploads/2023/07/Sustainability-Platform-v20.pdf The Sustainability Report is available at: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity has undergone several internal and external compliance audits. Legal deviations are published by the district government when they occur. The Entity is part of the Aditya Birla Group Annual Report. There were no significant fines, judgements, penalties or non-monetary sanctions received during the last period: https://www.hindalco.com/integrated-annual-report2022-23/index.html
3.3a Payments to governments (legal and contractual)	Conformance	The Entity complies with relevant local legislation and has implemented Policies and procedures to conform to this requirement. To prevent Corruption, detailed behaviours are described in the Code of Conduct.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has attained ISO 14001:2015 and ISO 45001:2018 certification and has implemented appropriate Complaints Resolution Mechanisms. A whistleblowing hotline is in place, refer to: https://app.convercent.com/en-US/LandingPage/918012dd-5b57-ee11-a9a3-000d3ab9f062?_=1695920313532
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has cooperated with an external consultant to conduct life cycle evaluations. The requirements of ISO 14040 are fulfilled.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity contributes Life Cycle Inventory (LCI) data to regional initiatives such as the Aluminum Association and the European Aluminium's Sustainable Development Indicators (SDI). 'Cradle to Gate' Life Cycle Assessments (LCAs), are provided to customers upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	'Cradle to Gate' LCAs, are delivered to customers upon request. LCAs are available for the relevant Products as well as for standard products. Relevant data are available at the European Aluminium SDI: https://european-aluminium.eu/members/novelis
4.2 Product design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has implemented a working scrap management process. Aluminium Process Scrap is reduced to a minimum and, if scrap is generated, it is 100% recycled or reused.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has a Closed-Loop production. Aluminium alloys and grades are recorded separately and recycled according to type.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented an Aluminium recycling strategy. The established goals have been met and the Entity has a continuous aim to increase the recycling rate. The recycling strategy captures the product from the beginning to End of Life: https://www.novelis.com/wp-content/uploads/2023/05/Novelis-Recycled-Content-Whitepaper.pdf
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is engaged in European initiatives or groups that support and improve national collection rates: https://www.novelis.com/wp-

CRITERION	RATING	COMMENT
		content/uploads/2023/07/Sustainability-Platform-v20.pdf
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity's energy use by source is publicly disclosed on an annual basis. Greenhouse Gases (GHG) Emissions KPIs and targets are provided in the annual Sustainability Report and 'Green Bond Framework', available at: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf https://www.novelis.com/sustainability/green-bond-report-annual-report-2023
5.2 GHG emissions reductions	Conformance	The Entity has undertaken operational activities to reduce energy consumption and GHG Emissions such as setting targets at the regional and plant level, installation of meters and action plans. GHG Emissions KPIs and targets are provided in the annual Sustainability Report and 'Green Bond Framework', available at: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf https://www.novelis.com/sustainability/green-bond-report-annual-report-2023/
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 has monitored, controlled, and constantly reduced its emissions. Emissions to Air are controlled according to local regulations and permits.
6.2 Discharges to Water	Conformance	The Entity has conducted routine water checks and monitoring and Discharges to Water comply with the operation permit. Discharges To Water and the risk of emissions to soil are required to be published in the report of the Emission Protection Officer (EHS Manager).

CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has developed a series of operational procedures relating to the assessment and management of Spills and Leakages. Risks are managed in the Aspects and Impacts Register.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed a series of operational procedures relating to assessment and management of Spills and Leakages.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The reporting of spills is regulated, trained, and tested. There have been no reportable Spills inside/outside the plant since ISO 14001 was implemented in 1999.
6.4b Reporting of Spills (regular reporting)	Conformance	The reporting of Spills is regulated, trained, and tested. There are regular visits by the state environmental authorities. There have been no reportable Spills inside/outside the plant since ISO 14001 was implemented in 1999.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a Waste Management Strategy. The waste management goals have been fulfilled and there has been a reduction in the waste stream. The Strategy has been completed in accordance with the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has publicly disclosed quantities of Hazardous and Non-Hazardous Waste generated by the Entity and the associated waste disposal methods. Key Performance Indicators (KPIs) and targets are provided in the annual Sustainability Report and 'Green Bond Framework', available at: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf https://www.novelis.com/sustainability/green-bond-report-annual-report-2023
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 (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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)	Conformance	The Entity recycles 100% of the white Dross. Black Dross is sent to external local reprocessors, who treat the Dross and return it as Aluminium bars.
6.8b Dross (recycling)	Conformance	The Entity recycles 100% of the white Dross internally. Black Dross is sent to external local reprocessors, who treat the Dross and return it as Aluminium bars.
6.8c Dross (review of alternatives)	Conformance	The residue from the Dross reprocessors (i.e., small amount of Aluminium, salt, and Aluminium oxides) are re-used in the secondary Aluminium, building and agricultural/soil stabilisation industries. The Entity conducts regular periodic reviews with each Dross reprocessor.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Minor Non-Conformance	The Entity monitors water usage according to local regulations. An overview of the water inputs, on site consumption and various wastewater flows are described and regularly reviewed. However, a water flow diagram is not currently available to provide a visible resource for understanding the incoming and outgoing of water.
7.1b Water assessment (risk assessment)	Conformance	The Entity has assessed its water-related risks and implemented prevention measures accordingly in their entire Area of Influence.
7.2a Water management (management plans)	Conformance	The Entity has implemented targets for its water management. The targets are regularly reviewed during authority visits and the annual Environmental Management System review.

CRITERION	RATING	COMMENT
7.2b Water management (monitoring)	Conformance	The Entity regularly monitors and reviews its water management consumption figures and specifications.
7.3 Disclosure of water usage and risks	Conformance	The Entity communicates significant water-related risks, if any, to the district Government and published as needed. Sustainability topics are provided in detail and made available to the public: https://www.novelis.com/sustainability https://de.novelis.com/wp-content/uploads/2021/07/Novelis-Green-Bond-Framework_2021_Final.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted an Environmental Risk Assessment as part of approval procedures. The risk assessment covers the entire Area of Influence including an assessment of Biodiversity impacts. The permit is available at: https://environment.data.gov.uk/public-register/industrial-installations/registration/EPR-BL6802IU?_pageState=result-all
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	The Criterion is not applicable as there were no Material impacts identified in the Biodiversity risk assessment. However, if necessary, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	The Criterion is not applicable as there were no Material impacts identified in the Biodiversity risk assessment. However, if necessary, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.2c Biodiversity management (reporting)	Conformance	The Entity identified there were no Material impacts on Biodiversity identified in its risk assessment. However, there are regular reporting processes during the annual management review and the public report to the state environmental authorities.
8.3 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.
8.4a 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.

CRITERION	RATING	COMMENT
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity publicly subscribes to the United Nations Guiding Principles. And issued and communicated both its Code of Conduct (Promote a Desirable Work Environment) and Supplier Code of Conduct (Labour and Human Rights), with a commitment to respect Human Rights. The Codes are available 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
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Code of Conduct with respect to Human Rights. As part of a risk assessment, the Entity examined the requirements related to Human Rights within its Area of Influence.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has identified there are no significant adverse Human Rights impacts based on a social compliance Self Assessment (SA 8000). The Entity has not identified any issue that has caused or contributed to adverse Human Rights impacts.
9.2 Women’s Rights	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the women’s rights requirements. The Entity has established the program entitled ‘Woman in Novelis’ (WiN). Targets for getting women in leadership and engineering roles have been documented in the Sustainability Report.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity’s operations.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and

CRITERION	RATING	COMMENT
		resources are not directly affected by the Entity's operations.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable to the Entity, as there is no planned expansion of the entire plant that may have an impact.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable to the Entity, as no resettlements are being considered or have taken place since joining ASI. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a Local Communities (rights and interests)	Conformance	The Entity does not claim any resources that could lead to a lack of resources in the area among its population. The Entity respects and is very sensitive to the neighbourhood, the community, and all other interest groups in the vicinity of the work. An evaluation of the interested parties took place.
9.7b Local Communities (impacts)	Conformance	The Entity's Social Self Assessment (SA 8000) confirmed that there are no issues with Local Communities and therefore no need for action.
9.7c Local Communities (livelihoods)	Conformance	The Novelis Group requests each of its sites to engage with Local Communities in order to respect and support their livelihoods and the Entity actively participates with Local Communities. For further information refer to the Novelis-Neighbour Program: https://www.novelisrecycling.co.uk/corporate-social-responsibility/novelis-neighbour
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has strict procedures to ensure it doesn't contribute to Human Rights abuses in Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity mainly performs the security activities but contracts an external security provider for gate control and plant security. The Entity does not employ armed security forces.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the local regulations on Workers' rights and applies a collective agreement for the metallurgy sector. All Workers are free to join local union organisations.

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the local regulations on Workers' Rights and applies a collective agreement for the metallurgy sector. All Workers are free to join any local union organisations. An infringement of this requirement has not been reported (e.g., Collective Bargaining).
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable to the Entity, as there is no need for alternative means of association in the country where the Entity is located.
10.2a Child Labour (minimum age)	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.
10.2b Child Labour (hazardous)	Conformance	The Entity does not use nor support the use of Child Labour and does not engage in or support Hazardous Child Labour. Young Workers are engaged for educational purposes only. If at all, work with hazardous substances occurs only under supervision and as part of vocational education.
10.2c Child Labour (worst forms)	Conformance	The Entity does not use nor support the use of Child Labour and does not engage in or support the Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not engage in nor support the use of Forced Labour. The Entity does not engage in or support Human Trafficking directly or through employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not engage in nor support the use of Forced Labour. The Entity does not require any form of deposit, Recruitment Fee or equipment advance from Workers directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not engage in nor support the use of Forced Labour. The Entity does not require Workers to lodge deposits or security Payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not engage in nor support the use of Forced Labour. The Entity does not hold Workers in Debt Bondage or force them to work to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not engage in nor support the use of Forced Labour. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace, as confirmed by interviews and document review. The Entity does not provide on-site housing.

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not engage in nor support the use of Forced Labour. The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not engage in nor support the use of Forced Labour. The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length.
10.4 Non-Discrimination	Conformance	The Entity ensures equal opportunities and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker 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. This is also embedded in the Code of Conduct.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or Harassment.
10.6 Disciplinary practices	Conformance	The Entity 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 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.
10.7b Remuneration (method of payment)	Conformance	The Entity's wage payments are timely, in legal tender and fully documented.
10.8 Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining agreements and each employment contract.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity is ISO 45001:2018 certified by an accredited certification body. The Entity has implemented and communicated its Occupational

CRITERION	RATING	COMMENT
		Health and Safety (OH&S) Policy as required by the ASI Performance Standard.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity's Environment, Health, Safety and Quality Policy is applicable to Workers and Visitors. Several activities have been implemented site in order to reduce workplace-related risks (e.g., best behaviour practices, safety culture). The Policy is available at: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity's Environment, Health, Safety and Quality Policy is accessible to all employees, Visitors, and suppliers (intranet/internet). The Policy includes the obligation to comply with legal requirements: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Employees are regularly briefed on workplace hazards (based on the risk assessment). They have the right and obligation to report unsafe conditions and stop the work immediately, if necessary.
11.2 OH&S Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System in accordance with ISO 45001. Any identified non-conformances are actioned by the Entity. Internal and external audits are conducted to confirm the effectiveness of the system.
11.3 Employee engagement on health and safety	Conformance	Employees are involved in the preparation of risk assessments. The Safety Officers have a mandate in the regular Occupational Health and Safety Committees, meetings are held four times a year.
11.4 OH&S performance	Conformance	The Entity's continuous improvement of Occupational Health and Safety (OH&S) performance is driven by performance indicators and the achievement of goals. The OH&S Committee meetings are held four times a year. There is a review of the numbers, and the targets and measures are discussed and coordinated. The performance measures include lagging and leading indicators.

Document Control and Version History

Revision	Date	Notes
0	31 March 2021	Initial Certification Audit – Provisional Certification
1	11 July 2022	Surveillance Audit – Full Certification
2	12 June 2024	Surveillance Audit