ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis Korea Limited

CERTIFICATE NUMBER

140

ASI STANDARD

PERFORMANCE STANDARD (V3 2022)

DATE OF ISSUE

26 JUNE 2024

CERTIFICATION LEVEL

FULL CERTIFICATION

DATE OF EXPIRY

25 JUNE 2027

ASI ACCREDITED AUDITING FIRM

DNV BUSINESS ASSURANCE SERVICES UK LTD.

CERTIFIED SINCE

26 JUNE 2024

AUTHORISED BY

The

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

The manufacture of Aluminium and Aluminium coil and sheet which includes the processes of recycling and remelting at the Yeongju Plant, Korea.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

Novelis Inc.
Novelis Korea Limited
The manufacture of Aluminium and Aluminium coil and sheet which includes the processes of recycling and remelting at the Yeongju Plant, Korea.
 Aluminium Re-melting/Refining Casthouses Material Conversion
Performance Standard V3
 Initial Certification Audit (24 – 28 May 2021) Surveillance Audit (7 – 9 December 2022) Re-Certification and Scope Change Audit (20 – 24 May 2024)
DNV Business Assurance Services UK Ltd.
 24 - 28 May 2021 (Initial Certification Audit) 7 - 9 December 2022 (Surveillance Audit) 20 - 24 May 2024 (Re-Certification and Scope Change Audit)
 9 June 2021 (Initial Certification Audit) 20 December 2022 (Surveillance Audit) 5 June 2024 (Re-Certification and Scope Change Audit)
Initial Certification Audit (24 – 28 May 2021) The Audit Scope includes all activities at the Novelis Korea Yeongju Plant located in Yeongju-si, Korea. Products produced in the Entity include Aluminium coil for cans, automotive products and the IPG (Industrial Product Group) which produces electronic products and construction parts. Supply chain activities included in the Audit Scope: Aluminium Re-melting/Refining Casthouses Material Conversion (Production and Transformation) All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. Surveillance Audit (7 December 2022 – 9 December 2022) The Audit Scope includes all activities at the Novelis Korea Yeongju Plant located in Yeongju-si, Korea. Products produced in the Entity include Aluminium coil for cans, automotive products and the IPG (Industrial Product Group) which produces

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion (Production and Transformation)

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

Re-Certification Audit and Scope Change (20 - 24 May 2024)

The Audit Scope includes all activities at the Novelis Korea Yeongju Plant located in Yeongju-si, Korea. Products produced in the Entity are Aluminium coil for cans, automotive products and the IPG (Industrial Product Group) which produces electronic products and construction parts.

Supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion

All applicable 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

26 June 2024 - 25 June 2027

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

26 December 2025

CERTIFICATE NUMBER

140



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

The Yeongju plant (the 'Entity') commenced operation as Taihan Electric Wire in 1993 and became a part of Novelis in 2005. The Entity is considered as a modern Facility with UBC Recycling, Casting, Hot Rolling, Cold Rolling and Finishing capabilities, with rolling equipment producing superior flat-rolled Aluminium products. The area under management is approximately 220 hectares and has approximately 740 employees. In 2023, the Entity produced 461,000 tonnes and sold 464,000 tonnes of Aluminium products. The Facility includes the administration office, vehicle parking (car, motorcycle and operating vehicle), warehouse, workshop, substation (power station), laboratories, raw material storage, fuel and chemical storage, cafeteria or canteen, utilities (water treatment plant & compressor), wastewater treatment plant, and sports Facilities. Key external Stakeholders include the Government/regulatory agencies of Korea, society, customers and suppliers. An upgrading technology project continues on site in order to increase the capacity of the Aluminium to 550,000 tonnes by 2025.

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	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL		MED	IUM	

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented a Policy, procedure, and process to maintain awareness and ensure Compliance with applicable laws. The legal compliance registers of social, labour, ethics, environment and health & safety are established to identify and maintain relevant legal regulations. Compliance audits are conducted annually, with Audit results reviewed and reported during management reviews.
1.2 Anti-Corruption	Conformance	The Policies related to anti-Corruption are established and addressed in the Novelis Code of Conduct and Supplier Code of Conduct. The Entity also has a separate Anti-Trust Policy including an Anti-Bribery and Anti-Corruption Policy. Training on the Novelis Code of Conduct is provided to Workers and the Novelis Supplier Code of Conduct is signed and acknowledged by suppliers and sub-Contractors.
1.3a-e Code of Conduct	Conformance	The Entity has established and implemented its Code of Conduct and Supplier Code of Conduct including principles related to environmental, social, governance and commitment to Local Communities. Periodic review of the Entity's Code of Conduct and Supplier Code of Conduct is stated in the Entity's ASI Performance Standard Manual. The Entity has provided employees and suppliers with training and communication on the Codes of Conduct. Code of Conduct 2023: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
		Supplier Code of Conduct is available at: https://www.novelis.com/suppliers
2. POLICY AND MANAGEMEN	Т	
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has established Policies, systems, procedures and processes on Environment, Social and Governance (ESG) principles reviewed periodically. The Entity has endorsement and support from senior management to provide sufficient resources for regular review of the Policies consistent with the ESG practices. The Entity's Code of Conduct and Policies are accessible on the intranet for communication with Workers.
2.2a-c Leadership	Conformance	The Entity has appointed senior Management Representatives with responsibilities defined to ensure conformance with the ASI Performance Standard and to ensure communication of relevant Environmental, Social, and Governance (ESG) Policies internally and externally. The Entity has identified and provided resources to establish, implement, maintain and improve its ESG Management Systems.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has established and implemented its own Environmental Management System and holds a valid ISO 14001:2015 Environmental Management System certification. The Entity's ISO 14001 certificate is accessible at: https://www.novelis.com/certifications

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established and maintained an integrated Social Management System Manual and Occupational Health and Safety Management System which is certified to ISO 45001. The Entity's ISO 45001 certificate is accessible at: https://www.novelis.com/certifications
2.4a-e Responsible Sourcing	Conformance	The Entity has developed and implemented a Policy, system, and process for responsible sourcing requirements. Major suppliers required to comply with the Supplier Code of Conduct (https://www.novelis.com/suppliers) and the Sustainability Report (Responsible Sourcing section, page 33): https://www.novelis.com/sustainability). The Entity identifies its major next-tier suppliers and conducts second party Due Diligence Audits with the follow-up improvement actions if any. The Entity's ASI Performance Standard Manual requires periodic reviews of the Responsible Sourcing Policy.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable, as the Entity currently has no New Projects or Major Changes to existing Facilities. However, the Entity has developed a procedure to implement and periodically review environmental and social impacts for New Projects or Major Changes to existing Facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable, as the Entity has no New Projects or Major Changes to existing Facilities. However, the Entity has developed a procedure to implement and periodically review Human Rights impacts for New Projects or Major Changes to existing Facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity has established and maintained Emergency and Contingency Response Plans which include collaboration with potentially affected Stakeholder groups such as communities and governmental offices. The Entity's ASI Performance Standard Manual prescribes periodic review of these emergency plans. Workers, including in-house sub-Contractors are provided with relevant emergency training and emergency drills are conducted periodically. The latest version of the Emergency and Contingency Response Plans are disclosed in the Entity's ASI Data Report (Emergency Plan, page 2): https://www.novelis.com/wp-content/uploads/2024/03/1_XEC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf
2.8a-d Suspended Operations	Conformance	According to the Entity's ASI Performance Standard Manual, business recovery/continuity programs against situations that may lead to suspending or significantly alter operations and its annual or biennial review of the emergency response plans and business continuity programs are established. Periodic reviews of the emergency response plan, and business continuity programs are established.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has established a management procedure in case of Mergers and Acquisitions. No such activity has occurred since the Entity became an ASI Member.
2.10a-b Closure, Decommissioning and Divestment	Conformance	There are no closures, decommissioning or divestments planned for the Entity in the near future. Should an event ever occur, the Entity will conduct a formal review of environmental, social and governance consequences against activities around closure, decommissioning or

CRITERION	RATING	COMMENT
		divestment, and consultation, where possible, with the participation of Affected Populations and Organisations.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's annual Sustainability Report has been verified by an external third-party verification body in August 2023 and is available at: https://www.novelis.com/sustainability The report is published based on the Global Reporting Initiative (GRI) and includes. key performance indicators, and Material environmental, social, governance, and economic impacts and activities are disclosed in the report including its performances, interactions with the Local Community and legal compliance information. Additional disclosure information (ASI Data Report) not included in the Sustainability Report is available at: https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf
3.2 Non-compliance and Liabilities	Minor Non- Conformance	The Entity publicly discloses information on significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Laws and regulations. There are no significant fines or penalties imposed, as disclosed in the ASI Data Report, page 3: https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf However, it was identified public disclosure of Material fines, judgments, penalties and non-monetary sanctions for failure is specific to the Environment and Health and Safety only. It does not include other areas including labour, ethics or other business operations (no significant fines in those areas have been present for the last three. years).
3.3a-c Payments to Governments	Conformance	The Entity's Financial Report is verified by a third party accounting firm and financial results are disclosed at: https://investors.novelis.com/historical-results http://dart.fss.or.kr Certificates of full national and local tax payments to Governments are issued and verified. The summary statement of payments to Government and information on direct or indirect value and beneficiaries of financial and in-kind political contributions are publicly disclosed in the ASI Data Report, page 6: https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity's internal complaints or grievance reporting mechanisms (e.g. hotline numbers and grievance handling council) are established and external anonymous complaints or whistle-blowing mechanisms (e.g., hotline numbers) are accessible through the internal intranet (InsideNovelis) and websites available at: Code of Conduct: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf

CRITERION	RATING	COMMENT
		Novelis Ethics Helpline: https://app.convercent.com/en- US/LandingPage/918012dd-5b57-ee11-a9a3- 000d3ab9f062?_=1695920313532
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity's Environmental Life Cycle Assessments (LCAs) are conducted by an external third party for major products (Aluminium Can Body and Aluminium Can End). The Environmental LCA reports are based on a 'cradle-to-grave' methodology, as per the ISO 14040:2006 Environmental Management - Life Cycle Assessment, Principles and Framework Standard.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The LCA report can be provided for external stakeholders, if required There have been no requests for LCA data to date. The Entity's LCA report in presented Korean and is publicly available at: https://www.novelis.com/wp- content/uploads/2024/03/2_%EC%98%81%EC%A3%BC%EA%B3%B5%EC% 9E%A5LCA.pdf
4.2 Product Design	Conformance	Whilst the Entity does not have a design or development process for their products, however it shas relevant objectives and activities in the design and development in the production process to enhance Circular Economy (CE) outcomes such as including alloy simplifications to reduce the use of prime ingots and considering environmental life cycle impacts on the products. The targets for these relevant aspects are defined, monitored monthly and evaluated annually.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established a Scrap Management Process, the process Scrap within its close-loop system operations is collected from production Facilities and recycled/reused without further storage. The Entity has a target of 100% Scrap for collection, recycling and/or re-use and it is included in the LCA data. LCA, section Production Input/Output, page 3: https://www.novelis.com/wp-content/uploads/2024/03/2_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5LCA.pdf The Entity has implemented the separation of Aluminium alloys and grades for recycling. The generated target for the process Scrap utilisation rate is 100%.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has established a recycling strategy and annual targets to increase using Scrap materials in production and these targets are monitored every month. The Entity's Recycling Strategy and commitment to increasing recycling Scrap in its production is included in the Sustainability Report, page 12: https://www.novelis.com/sustainability
4.4d Collection and Recycling of Products at End of Life	Conformance	There is no mandated local or national collection and use of Aluminium Scrap in Korea. The Entity has established its recycling plans to increase and implement accurate measurement of recycling rates for the production such as purchases of used beverage can (UBC) scraps from collectors and a customer return-process Scrap to the Entity for shredding and re-melting for re-use. The Entity's

CRITERION	RATING	COMMENT
		recycling strategy is included in the Sustainability Report, pages 12 and 21: https://www.novelis.com/sustainability
5. GREENHOUSE GAS EMISSION	SNC	
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity is incorporated into the Greenhouse Gas (GHG) Emission Trading Scheme regulated by the Government. Direct and Indirect GHG emissions and energy use by source are tracked, calculated and documented. As legally bound, the Entity's GHG emission and Energy use are verified by the accredited third party annually and independent verification reports are available. Material energy use and GHG Emissions by source (Scope 1 Gas, Scope 2 Electricity) are disclosed in the ASI Data Report, page 1: https://www.novelis.com/sustainability GHG Scope 3 emissions is disclosed in the Sustainability Report, page 25: https://www.novelis.com/sustainability
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's Decarbonization Strategy aligned with a 1.5°C warming scenario (Net Zero by 2050), Greenhouse Gases (GHG) Emissions Reduction Plans (30% reduction by 2022 to 2026 based on 2016 baseline year) and reduction pathways (Direct and Indirect GHG emissions) are established and controlled. An annual review of GHG emissions reduction targets, plan and reduction pathway has been developed and monitored. The Entity's GHG emission reduction plans and pathways including net zero Policy by 2050 are disclosed in the ASI Data Report (Green House Gas, page 1, https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf) and the progress against the reduction plans is included in the Sustainability Report (Progress Toward our Goal, page 10: https://www.novelis.com/sustainability).
5.4 GHG Emissions Management	Conformance	The Entity has developed and maintained a GHG Management Procedure with aspects associated with GHG emissions and energy use, its controls, monthly monitoring, and annual internal compliance audits. Periodic internal audits against the Entity's GHG Management System are conducted and relevant improvement actions are made if applicable.
6. EMISSIONS, EFFLUENTS AN	D WASTE	
6.1a-f Emissions to Air	Minor Non- Conformance	The operation of the Entity's air emission Facilities is approved by the Government. The pollutants in the air emissions are identified and

CRITERION	RATING	COMMENT
		assessed in the Environmental Impact Assessment. The waste air generated in the operation is collected and treated before emission to mitigate adverse impacts. The dust from the remelting/refining process is the major source and scrubbers are used to mitigate air pollutants. Daily operation of air emission Facilities is recorded by the qualified responsible persons. Emission reduction plans are reviewed annually according to the ISO 14001 certified Environmental Management System and the Entity's Material emissions are quantified and disclosed in the ASI Data Report (Emission Management, page 2): https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf Government Environmental information registration website: https://www.env-info.kr/user/register/viewUserSearch2.do?YEAR=2022&COMP_ID=00000000000000171624&OPEN_YN=Y However, it was identified the latest plans to minimise exposure to the environment including exceedance of legal limits are currently not included in the Entity's public disclosure.
6.2a-g Discharges to Water	Conformance	The Entity operates wastewater treatment plants on its premises. The Entity has established water reduction targets and plans to minimise adverse impacts to the environment. The Entity's Material water discharges and the latest plans are disclosed in the ASI Data Report (Water Management, page 2): https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC% 9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	According to the Entity's Environmental Impact Assessment Procedure, the Entity has conducted an Environmental Impact Assessment and Off-Site Risk Assessment where Spills and Leakages may contaminate air, water, and soil. Following the Environmental Impact Assessment and Off-site Risk Assessment, the Entity has established control plans to prevent Spills and Leakages. Relevant training is provided to Workers. The scope and responsibilities for external communication (government agencies, communities, other factories nearby) on Spills and/or Leakages are defined in the Crisis Response Plan and Emergency Management Procedure. Daily inspection of Spills and/or Leakages, and periodic soil and Leakage tests are conducted. The Entity's control plans related to Spills and/or Leakages are established and reviewed annually according to the ISO 14001 certified Environmental Management System. These control plans are disclosed in the ASI Data Report (Spills/Leakages Management, page 3): https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The reporting of Spills and/or Leakages is defined in the Entity's Crisis Response Plan and Emergency Management Procedure. The Impact Assessments of Spills and/or Leakages and remediation actions taken have been published, and there have been no reported cases of Spills and/or Leakages within the last three years. The relevant statement is disclosed in the ASI Data Report, page 3: https://www.novelis.com/wpcontent/uploads/2024/03/I_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf

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6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a waste reduction goal and strategy according to the Waste Mitigation Hierarchy disclosed in the Sustainability Report, page 10: https://www.novelis.com/sustainability
		Wastes (general and Hazardous) are transferred and disposed of by qualified vendors, and waste reduction targets are established to minimise the negative impacts on the environment. The Entity discloses its annual quantities of Hazardous and Non-Hazardous Wastes and its associated waste disposal methods (Landfill/Recycling) in the ASI Data Report, page 3: https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf
		<u> </u>
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	According to the Entity's Dross Handling Procedure, Dross from the Entity is sold (white Dross) and sub-contracted (black Dross) to an external processor for Dross recovery and recovered Aluminium is returned for recycling. The recovery rate from the external Dross processor is monitored annually and managed via an agreement with the external Dross processor. The Entity has an agreement with a third-party institute to improve Dross recovery for recycling and facilitates meetings with the external Dross processor to increase the recycling rate from Dross residues and to identify alternative options for recycling Dross that is not recovered. Currently, the residual left from the recovered Dross becomes raw materials of deoxidiser and construction materials.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity's water sources include both underground water and municipal water. A water flow diagram including withdrawal and use by source and type is in place. The water balance analysis is monitored and controlled through the Entity's online monitoring system. Based on the water risk assessments, the Entity's operational, internal, and external risks in their Area of Influence are taken into consideration in the water risk assessment. Due to the nature of the production processes and the existing Water Management Systems, the water-related risk has been determined as low in the local water environment and it is disclosed in the ASI Data Report (Water Management, page 2) https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable, as the Entity's assessment of water risk is rated and documented as low.
8. BIODIVERSITY AND ECOSY	STEM SERVICES	

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity's Environmental Impact Assessment (internal and external), and off-site Risk Assessment include Biodiversity and Ecosystem Services risks. The Biodiversity and Ecosystem Services risk assessment determined that any impacts from the operation of the Entity in its Area of Influence was assessed as low, and it is accessible in the Entity's ASI Data Report, page 4: https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity's identified Biodiversity and Ecosystem Services risks are rated as low and no Priority Ecosystem Services are identified.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity has assessed and documented the risk of Biodiversity and Ecosystem Services as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as the Entity has not identified Priority Ecosystem Services in its Area of Influence as it is located in an industrial complex.
8.4 Alien Species	Conformance	The Entity takes action to prevent the introduction of Alien Species that may have Material adverse impacts on Biodiversity and Ecosystem Services. Wooden materials used are fumigated to prevent the introduction of Alien Species into the Entity's premise and the relevant heat-treatment certificates are maintained. Disinfection for pest control is conducted periodically.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has committed to a "no go" in World Heritage Properties in their ASI Performance Standard Manual and Risk Assessment on Labor, Ethics, and Social aspects. It has also identified a list of World Heritage Properties in Korea, available at: heritage.unesco.or.kr The Entity's risk identification and assessment has demonstrated there
		are no World Heritage sites within their Area of Influence and that the risk is assessed as low.
8.6a-d Protected Areas	Conformance	Due to the Entity's location (i.e. within an industrial complex), the Protected Area Risk Assessment for relevant risks is rated as low. Based on the Entity's ASI Performance Standard Manual and Risk Assessment on Labor, Ethics, and Social aspects, the Entity's risk assessment result and identification of the no Protected Areas as disclosed in the ASI Data Report, page 6: https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf
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	The Entity's commitment to the respect of Human Rights is stated in the Novelis Code of Conduct, available at:

CRITERION	RATING	COMMENT
		https://www.novelis.com/wp-content/uploads/2020/07/Novelis- Code-of-Conduct-2023-English.pdf
		The Entity conducts an annual Risk Assessment on Labour, Ethics, and Social aspects, including Due Diligence. This assessment involves identifying and assessing potential risks, evaluating conformity against the risks, implementing control measures and targets on Human Rights, and conducting periodic reviews. As a result, no adverse Human Rights impacts have been found. The Entity has also completed the mapping of Affected Populations And Organisations, including within their supply chains.
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity is committed to respecting women's rights and has established and implemented a strategy and actions to increase gender diversity. Relevant targets to promote gender equity are established, monitored and reviewed by senior management annually. The legal requirements for women's rights including maternity protection are identified and addressed in the Entity's Employment Regulations, and Regulation on Maternity Protection. No complaints have been received on women's rights including gender Discrimination from female Workers. The effectiveness of the Entity's measures to promote gender equity is disclosed in the ASI Data Report, page 6: https://www.novelis.com/sustainability Report, pages 40 and 41: https://www.novelis.com/sustainability
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence and no New Projects or Major Changes have taken place since the Entity joined ASI.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Conformance	Based on a review of the official Government website of Land Use and Development Information Service (www.eum.go.kr), Cultural Heritage Administration (www.cha.go.kr), and the Entity's Risk Assessment on Labor, Ethics, and Social aspects, there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no New Projects or Major Changes have taken place since the Entity joined ASI and no displacement or no resettlement activities are necessary.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has a Policy on respecting relevant legal and customary rights and interests of Local Communities. The Entity has conducted the relevant risk assessment and has control plans which are implemented and reviewed periodically. Various activities including charity or support activities with Local Communities are undertaken by the Entity and are addressed in the Sustainability Report (Caring for Our Communities section, page 43): https://www.novelis.com/sustainability
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has established Policies on conflict minerals as addressed in the Conflict Minerals Declaration, Supplier Code of Conduct, and Conflict Minerals Report. The Entity's suppliers are required to comply with the requirements of conflict minerals (Novelis Procurement Terms and Conditions). A Management system has been established to manage conflict minerals including bauxite, tungsten, tantalum, gold, and tin and it is stated in the Conflict Minerals Report. Roles and responsibilities, and the Due Diligence process for suppliers including a risk assessment are established. The Supplier Code of Conduct is available at: https://www.novelis.com/suppliers
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a risk assessment on conflict minerals within relevant supply chains. The risk assessment includes potential risks of involvement in armed conflict or Human Rights abuses and relevant risks are identified, assessed and rated. Risks identified of involvement in armed conflict or Human Rights abuses are rated as low.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has established a strategy to respond to the identified risks against conflict minerals which are included in the Conflict Minerals Report. The Entity's supply chain risk assessment has demonstrated no involvement in armed conflict Or Human Rights abuses. To maintain conformance, the Entity conducts regular supply chain Due Diligence and responds to identified risks as summarised in the Conflict Minerals Report.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices are audited and verified as a part of the ASI Performance Standard audit process.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non- Conformance	Activities on the Entity's Due Diligence process and declaration of non-involvement in armed conflict or Human Rights abuses are reported in the Entity's Conflict Minerals Management Report. However, the Conflict Minerals Management Report is reported internally and not yet disclosed publicly.
9.9 Security practice	Conformance	The Entity's security services are outsourced and the security Contractor agreed to comply with the Entity's Supplier Code of Conduct. A compliance audit against the security provider was conducted with no negative findings issued. Direct and indirect physical searches, including restrictions on the freedom of movement is not undertaken by the security provider. No grievances or complaints against security activities have been received to date.

CRITERION	RATING	COMMENT
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity is committed to respecting Freedom of Association. A Labour Union is present, and Union representatives are elected by Workers anonymously and directly. Workers have a right to join or not join the Labour Union. The Entity is committed to respecting Collective Bargaining Rights and the Collective Bargaining Agreement is in place and is declared to the Government within the required timeframe.
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 there are no restrictions on the right to Freedom of Association and Collective Bargaining based on the Constitution of the Republic of Korea.
10.2a Child Labour	Conformance	The Entity is committed to the prohibition of Child Labour and the prohibition of Child Labour under 15 years old is regulated. Young Workers under 18 years old are managed under special protection as specified in the law and young Workers are not allowed to work in hazardous working conditions. There is no history or current use of child Workers under 15 years old or young Workers under 18 years old.
10.3a-c Forced Labour	Conformance	The Entity is committed to the prohibition of Forced Labour as addressed in the Novelis Code of Conduct and the ASI Performance Standard Manual. Workers are not required to pay any form of deposit, savings, or recruitment fee. There are no foreign migrant Workers including in-house sub-Contractors. Labour contracts are agreed and signed between the Entity and Workers and no terms of Debt Bondage labour are found. Workers' original documents are not retained and can terminate their employment with a specific notice period in advance without any penalty. The Slavery and Human Trafficking Statement (Modern Slavery Statement) is endorsed by senior management including the Policy, Due Diligence process. Results are disclosed at: https://www.novelis.com/wp-content/uploads/2024/03/3_Modern-Slavery-Statement_Novelis-Korea_240126.pdf
10.4a-c Non-Discrimination	Conformance	The Entity is committed to the prohibition of any types of Discrimination as addressed in the Entity's Code of Conduct (https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf) and ASI Performance Standard Manual. The Entity's recruitment process, job advertisement and job application template indicate the decisions are solely based on the candidate's ability to perform the job requirements rather than other personal characteristics. The Entity has implemented various projects to promote non-Discrimination, workplace diversity and inclusion through the Employee Resource Group. No cases of grievances or complaints on Discrimination have been received to date.
10.5 Communication and engagement	Conformance	Workers can freely express their concerns or complaints regarding working conditions and the resolution of workplace and compensation issues without the threat of reprisal, intimidation, or Harassment. Direct and periodic communication between the Entity and Workers or Workers' representatives is established and implemented. All interviewed Workers know where to lodge complaints or report concerns.

CRITERION	RATING	COMMENT
10.6a-g Violence and Harassment	Conformance	The Entity's Policy on prohibition of Violence, abuse and sexual Harassment is addressed in the Code of Conduct which is reviewed periodically and available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
		Relevant regulations including disciplinary regulations are established and maintained. Implementation of the Policies is made in consultation with Workers' representatives including labour management council meetings. The risk assessment and its control measures on the prohibition of abuse, Harassment and sexual Harassment are developed and conducted. Workers are provided with training and communication on the regulations and control measures.
10.7a-c Remuneration	Conformance	Information and regulations related to the payment are regulated in the Entity's Employment Rules and other supporting regulations. Based on the review of pay slips including pay slips from in-house sub-Contractors, Workers are paid at least the same or higher than the legal minimum wage and 150% of the ordinary wage for Overtime, night-time shifts (i.e. 22:00 to 06:00) and holiday work is paid. Workers are provided with pay slips with the details of their pay, including the base wage, Overtime wages, other allowances and deductions. Payments are made directly to Workers via bank transfers each month. Monthly payments are made on time and there has been no delay in payment.
10.8a-c Working Time	Conformance	The Entity has developed regulations on working hours, rest and other leave entitlements, and conducted formal risk assessment on working hours rated as low. Based on the sampled review of working hour records, Workers do not exceed legal working hour limits and have an average of one day off every seven days. Workers interviewed confirm they do not work exceed legal working hours and can freely use their leave entitlement.
10.9a-b Informing Workers of Rights	Conformance	Workers are informed of their rights described in the Entity's Code of Conduct, Collective Bargaining Agreement (CBA), Employment Regulations, Labor Contracts, and other regulations or Policies through the Entity's intranet or bulletin board. Freedom of Association and Collective Bargaining are not restricted in Korea and a Labour Union is present.
11. OCCUPATIONAL HEALTH A	ND SAFETY	
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity's Occupational Health and Safety (OH&S) Policy and Code of Conduct both include a commitment to comply with legal requirements. Continuous improvement is established, implemented, reviewed periodically and communicated with Workers and Stakeholders. The Policy is available at:
		https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy- Guidelines_ENG.pdf
		Code of Conduct (Article 9. Promote Sustainability - Respect the Environment, Health and Safety): https://ko.novelis.com/wp-content/uploads/2023/04/Novelis-Code-of-Conduct-2023-Korean.pdf

CRITERION	RATING	COMMENT
		The Entity has established and implemented an Occupational Health and Safety (OH&S) Management System applicable to Workers, employees and Visitors, and is certified to ISO45001:2018. A Legal register is updated quarterly, and a risk assessment is undertaken periodically. Internal audits and management reviews of the OH&S Management System are undertaken periodically.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	A management review is undertaken annually according to the Entity's Business Management System Manual, where the Entity also reviews the Policy, targets, and Occupational Health and Safety Management System performance. Internal and external communications regarding health and safety aspects are regulated in the Business Management System. The effectiveness of the OH&S Management System including lagging indicators, and comparative analysis of performances with peer businesses and leading practices are disclosed in the ASI Data, page 5: https://www.novelis.com/wp-content/uploads/2024/03/1_%EC%98%81%EC%A3%BC%EA%B3%B5%EC%9E%A5ASI%EB%8D%B0%EC%9D%B4%ED%84%B02023%EB%85%84.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established formal documented procedures for Workers' consultation and participation in Health and Safety aspects. There are periodic Health and Safety committee meetings with labour representatives and Contractors to discuss and improve Health and Safety issues and relevant results of the committee meetings are communicated with Workers. Workers can freely report on near-miss incidents and concerns, offer advice on Health and Safety concerns and further review improvement actions are implemented as required.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	21 June 2021	Initial Certification Audit – Full Certification
1	17 January 2023	Surveillance Audit
2	26 June 2024	Re-Certification and Scope Change Audit – Full Certification