

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Aluminium Norf GmbH (Alunorf)

CERTIFICATE NUMBER
16

ASI STANDARD
PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

GUTCERT (AFNOR
GROUP)

DATE OF ISSUE
22 DECEMBER 2024

DATE OF EXPIRY
21 DECEMBER 2027

CERTIFIED SINCE
29 JANUARY 2019

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
ACN 606 661 125, Australia
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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

Aluminium Norf GmbH ('Alunorf') in Neuss, Germany, is a Joint Venture owned by Speira and Novelis Inc to produce Aluminium coils.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Speira and Novelis Inc (Joint Venture)
ENTITY NAME	Aluminium Norf GmbH (Alunorf)
CERTIFICATION SCOPE	Aluminium Norf GmbH ('Alunorf') in Neuss, Germany, is a Joint Venture owned by Speira and Novelis Inc to produce Aluminium coils.
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 (5 – 27 November and 3 – 4 December 2018)Re-Certification Audit 26 – 28 October 2021)Re-Certification Audit and Scope Change (30 September – 8 October 2024)
AUDIT FIRM	GUTcert (AFNOR Group)
AUDIT DATE	<ul style="list-style-type: none">5 – 27 November and 3 – 4 December 2018 (Initial Certification Audit)26 – 28 October 2021 (Re-Certification Audit)30 September – 8 October 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">12 December 2018 (Initial Certification Audit)30 November 2021 (Re-Certification Audit)28 October 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (5 – 27 November and 3 – 4 December 2018)</u></p> <p>The Audit Scope covered all production lines (delivery, melting halls, rolling mills, storage) to produce aluminium coils at the Alunorf facility in Neuss, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouseSemi-Fabrication <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit (26 – 28 October 2021)</u></p> <p>The Audit Scope covered all production lines (delivery, melting halls, rolling mills, storage) to produce aluminium coils at the Alunorf facility in Neuss, Germany.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouse

-
- Semi-Fabrication

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

Re-Certification Audit and Scope Change (30 September – 8 October 2024)

The Audit Scope covered all production lines (delivery, melting halls, rolling mills, storage) to produce Aluminium coils at the Alunorf facility in Neuss, Germany.

Supply chain activities included in the Audit Scope:

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

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

22 December 2024 – 21 December 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

21 December 2027

CERTIFICATE NUMBER

16



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

Aluminium Norf GmbH (Alunorf) (the 'Entity') based in Neuss, Germany, is a Joint Venture between Novelis Deutschland GmbH, Göttingen, and Speira GmbH, Grevenbroich, which each hold half of the company's share capital. The Entity manufactures rolled and cast products on a reworking basis and exclusively for the shareholders, which then processes the raw material at their locations around the world.

The Neuss plant was founded in 1965 and covers an area of approximately 577,000 square metres, which includes three large production areas including the re-melting plant and re-cycling centre, the hot strip area and cold strip area. Approximately 1.5 million tonnes of rolled Aluminium is produced annually which is subsequently manufactured by customers to produce cans, foils, offset printing plates and automotive parts. The Entity currently has over 2,200 employees.

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 developed and implemented Policies, systems, procedures, and processes. The Entity holds ISO 14001, ISO 45001 and ISO 5001 certifications from an accredited certification body as well as being registered under the European Union (EU) Eco-Audit and Management Scheme (EMAS). The Entity's Joint Venture partners, Novelis and Speira, support the site with legal counsel.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms. Among the instruments is the Entity's Code of Conduct. The Entity has provided training to employees on business ethics. An external tax auditor periodically audits the financial system. A Whistleblower Hotline is implemented: https://alunorf.speakup.report/compliance-hotline?title=undefined
1.3a-e Code of Conduct	Conformance	The Entity has publicly disclosed its Code of Conduct which includes relevant principles for environmental, social and governance performance: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/20240926_Code_of_Conduct.pdf The Code is reviewed every five years, with the most recent review completed in 2024.
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has issued and communicated Policies regarding the environmental, social and governance facets and reviews them on an annually. They are consistent with the requirements of the ASI Performance Standard. The Policy statements are publicly available in the following documents: Environmental Declaration 2024: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Umwelt/Alunorf_Umwelterkl%C3%A4rung_2024d_Web.pdf Social Report: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Sozialbericht_Alunorf_2024_003.pdf
2.2a-c Leadership	Conformance	The Entity's Environmental Manager has the overall responsibility and authority to ensure conformance with the ASI Performance Standard and sufficient resources to support the implementation of the Standard. Local personnel also support this role.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has implemented a Management System that is certified according to ISO 14001, ISO 45001 and EMAS (EU Eco-Management and Audit Scheme). Certificates are available at: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Umwelt/Zertifikate/2022/ISO_45001_d_2022.pdf https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Umwelt/Zertifikate/2022/EMAS-Urkunde_2022d.pdf https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Umwelt/Zertifikate/2022/ISO_14001_d_2022.pdf

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has documented and implemented a Social Management System, however it is not certified or externally verified. Human Rights and Labour Rights are respected. Interviews conducted during the Audit with management, and Workers and their representatives (Works council) confirmed the effective implementation of the Social Management System.</p> <p>The Entity's Social Report is publicly disclosed: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Umwelt/Sozialbericht.pdf</p>
2.4a-e Responsible Sourcing	Conformance	<p>As the Entity only completes the transformation process (remelting and rolling mill) and is supplied with metals by Joint Venture owners (Novelis and Speira) before delivering finished products back to the two owners, the metal purchasing is undertaken by both Novelis and Speira.</p> <p>Suppliers of the Entity are required to sign a supplier declaration, confirming that they abide by the Entity's standards with regards to governance, social and environmental facets.</p> <p>The Supplier Code of Conduct was last reviewed in October 2023 and is available at: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Supplier_Declaration_english.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as there have been no New Projects or Major Changes since the Entity joined ASI. All significant projects and changes are subject to Environmental and Health and Safety Impact Assessments, as mandated by law.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as there have been no projects or Major Changes that would have required a social, cultural or Human Rights Impact Assessment since the Entity joined ASI. All larger projects and changes are subject to Environmental and Health and Safety Impact Assessments, as are already mandated by law.
2.7a-f Emergency Response Plan	Conformance	As part of the Entity's ISO 14001 and ISO 45001 certified Management System, Emergency Plans have been developed and implemented. The Plans are reviewed periodically by the fire department and public authorities according to regulations. The Emergency Response Plans are available to Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	The Entity's owners (Speira and Novelis) manage the Business resilience plan, both certified ASI Members. The plan will be reviewed according to Management Systems requirements within five years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity may only perform an acquisition with the consent of both owners, which has not happened to date. If such a situation would occur in future, at least one owner has implemented a procedure covering the development and execution of investment projects. It ensures a uniform and consistent evaluation of project proposals and alignment across the Business Areas and ensures that environmental, social and governance issues are addressed in the Due Diligence process for mergers and acquisitions.

CRITERION	RATING	COMMENT
2.10a-b Closure, Decommissioning and Divestment	Conformance	Closure and decommissioning events would be managed by the two owners of the Entity. At least one owner has implemented a written directive covering all health, safety, and environmental impacts. It describes the entire life cycle of operations, from exploration and planning through to operation and closure including decommissioning, remediation, and rehabilitation.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's Environmental Declaration and Social Report are publicly available on the Entity's website at: https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
3.2 Non-compliance and Liabilities	Conformance	The Entity has publicly disclosed information on Material fines, judgments, penalties, and non-monetary sanctions on their webpage at: https://www.alunorf.de/compliance
3.3a-c Payments to Governments	Conformance	The Entity has only made, or has made on its behalf, payments to governments on a legal and/or contractual basis. The Entity includes information on payments to governments on their webpage at: https://www.alunorf.de/compliance
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented various Stakeholder Complaints Mechanisms and has a contact for external Stakeholders (Email: complaints@alunorf.de Telephone: +49 2131 937 8336). Employees have access to various channels to direct their concerns, requests, or grievances, e.g., there is a whistleblower hotline ('Speakup'): https://alunorf.speakup.report/compliance-hotline?title=undefined The Works Council is involved in the resolution mechanism. The Grievance Mechanism is addressed within the Collective Agreement.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity's Joint Venture partners (Speira and Novelis) supply their Primary and Recycled Aluminium to the Entity to have it processed and then delivered to their customers. The Entity has provided relevant data to its Joint Venture owners who have subsequently evaluated the 'cradle-to-gate' life cycle impacts of their major Product lines.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has no direct customers. One of the Entity's owners addresses customer requests by providing correct Life Cycle Assessment (LCA) information. Both Joint Venture owners are ASI Performance Standard Certified. When communicating externally on LCA information, the Entity communicates through its owners with the adequate assumptions and boundaries.
4.2 Product Design	Conformance	The Entity's Joint Venture owners integrate sustainable requirements into the development process of new Products and the Entity's production integrates sustainable goals and Key Performance Indicators.

CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	Scrap is well managed by the Entity, which has enabled a reduction of Scrap generation and a 100% rate of internal recycling. The Entity thoroughly separates alloys and grades for its internal recycling.
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.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity's Joint Venture owners have recycling strategies that engage Stakeholders on different levels, markets, and Product lines. The Joint Venture owners are members of programs including the 'Every Can Counts' campaign to increase overall awareness of recycling.

5. GREENHOUSE GAS EMISSIONS

5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity calculates its greenhouse gas (GHG) emissions (Scopes 1, 2, 3) and publicly disclosed emissions and energy use by source annually in the latest 2023 Environmental Statement, page 9: https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
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 defined a long-term goal to reduce GHG emissions and has implemented multiple projects to achieve it. The main projects are published annually in the verified 2023 Environmental Statement with their associated GHG emission reduction targets, page 4: https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit The Decarbonisation Pathway was developed according to the ASI Entity GHG Pathways Method and Calculation Tool, and targets were publicly disclosed via the Environmental Statement 2022 and follows a 2021 baseline year.
5.4 GHG Emissions Management	Conformance	The Entity uses the Environmental Statement to publish its GHG emissions targets and actions for emissions reduction. Different Stakeholders such as representatives for environment, energy or waste are reporting on different levels about the status of the reduction projects. The annual Management Review is the mechanism for representatives across the environment, energy, and waste areas to report on the status of the Entity's actions.

6. EMISSIONS, EFFLUENTS AND WASTE

6.1a-f Emissions to Air	Conformance	Emissions to Air are strictly controlled according to local regulations and permits. Emissions are below threshold values, and the Entity has
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CRITERION	RATING	COMMENT
		implemented projects aimed at further reducing emissions. The latest Environmental Statement regarding Emissions to Air, page 8: https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
6.2a-g Discharges to Water	Conformance	Discharges to Water are strictly controlled according to local regulations and permits. Discharges are below threshold values, and the Entity has implemented projects aimed at further reducing emissions. The latest 2023 Environmental Statement regarding Discharges to Water, page 9: https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
6.3a-g Assessment and Management of Spills and Leakages	Conformance	Based on multiple legal requirements, the Entity has undertaken risk assessments and implemented prevention measures for potential Spills or Leakages. The Entity has communication plans for potential Spills and Leakages. There have been no significant Spills at the Entity over the past 25 years.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has a procedure to communicate accordingly on significant Spills and report it publicly in the verified Environmental Statement. There have been no significant Spills at the Entity over the past 25 years. The latest Environmental Statement is available at: https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
6.5a-c Waste Management and Reporting	Conformance	The Entity implemented a waste management strategy according to German law and the Waste Mitigation Hierarchy. The Entity discloses the quantities of Hazardous and Non-Hazardous Wastes and their disposal methods in its Environmental Statement. The latest 2023 Environmental Statement, page 9: https://www.alunorf.de/verantwortung/umwelt-und-nachhaltigkeit
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 Dross is collected and processed internally to improve its recovery before being recycled externally. No Dross is landfilled.

7. WATER STEWARDSHIP

7.1a-b Water Assessment and Disclosure	Conformance	The Entity monitors its water usage, withdrawal, and effluent according to local regulations. The Entity has assessed its water-related risks within its Area of Influence and implemented prevention measures accordingly. There are no significant risks identified.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as water-related risks were assessed as not Material and all monitored values are below the authorised thresholds. Nevertheless, the Entity has implemented projects to reduce water related risks, which are regularly reviewed during the EMAS (EU Eco-Management and Audit Scheme) verification process.

8. BIODIVERSITY AND ECOSYSTEM SERVICES

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has assessed the Biodiversity risks and Materiality within its Area of Influence. The risk has been determined as low.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as no Material Biodiversity risks, including Ecosystem Services, were identified in the risk assessment.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as no Material Biodiversity risks were identified in the risk assessment.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Material Biodiversity risks, including Ecosystem Services, were identified in the risk assessment.
8.4 Alien Species	Conformance	The Entity has taken preventive 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	Conformance	The Entity is a single-site Facility based in Neuss, Germany, with the closest World Heritage Property to the site being the Cologne Cathedral, located approximately 40 kilometres from the Entity. No World Heritage properties are directly impacted by the Entity.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity as there are no Protected Areas within the Entity's 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>The Entity has committed to respect Human Rights in its Code of Conduct and has repeated this commitment in the Social Report: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Sozialbericht_Alunorf_2024_003.pdf</p> <p>The Entity's Joint Venture owners have each conducted documented Human Rights Due Diligence assessments and provided the results to the Entity. Note that the Entity itself does not purchase Aluminium but processes material on behalf of its owners. Human Rights aspects are covered by the Entity in the procurement process, where suppliers are requested to respond to supplier questionnaires. During the assessment, there were no indications for Human Rights violations observed. As confirmed by interview with Stakeholders, Workers, and management as well as by document review, there were no salient adverse Human Rights impacts identified. The Entity did not identify as having caused or contributed to adverse Human Rights impacts within its Area of Influence.</p>

CRITERION	RATING	COMMENT
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>Interviews with female Workers, Worker representatives, management and other employees did not identify any deliberate female Discrimination or issues regarding their wellbeing.</p> <p>The Entity has recognised that the number of women Workers in the production and maintenance departments is low. In response, they have implemented actions aimed at encouraging more women to apply for these positions. The Entity is proactively working with schools and universities to provide opportunities for women interested in starting their careers at the Entity across different areas on all available levels.</p> <p>Information on Gender Equity and Women's Empowerment is included in the Social Report: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Sozialbericht_Alunorf_2024_003.pdf</p> <p>and in the Entity's Annual Report 2023, page 3: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Unternehmen/%C3%9Cber_uns/Bericht_%C3%BCber_das_59._Gesch%C3%A4ftsjahr.pdf?title=%C3%9Cber%20uns</p>
9.3a-i 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.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	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.
9.4b 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 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 is not applicable to the Entity, as sacred or cultural heritage sites or values are not present within the Entity's Area of Influence. The Entity is located within an industrial zone.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as sacred or cultural heritage sites or values are not present within the Entity's Area of Influence. The Entity is located within an industrial zone.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no Resettlements are being considered or have taken place during the period since joining ASI or are expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.
9.7a-h Affected Populations and Organisations	Conformance	The Entity is located within an industrial zone. The rights and interests of Local Communities are respected, as relevant activities are subject to a permitting process by authorities. In addition to the Entity's Human Rights Due Diligence process determining there are no Local Community issues. Stakeholder interviews and media research

CRITERION	RATING	COMMENT
		undertaken during the Audit confirmed that there are no salient issues regarding the rights and interests of Local Communities.
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	The Entity is not located in or near a Conflict-Affected or High-Risk Areas (CAHRAs). Risks inherent in the supply chain are either managed by the Entity's owners (Novelis and Speira) or by the Entity's own purchasing function, which conducts a supplier screening prior to procurement. During the assessment, there was no indication that the Entity could contribute to armed conflict or Human Rights abuses in CAHRAs.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has implemented strict procedures to ensure it does not contribute in any way to Human Rights abuses in CAHRAs. To become a supplier, the supplier must accept the Supplier Declaration and confirm that it complies with the rules. With the Supplier Declaration, the Entity secures the possibility to carry out audits or inspections at the supplier, and to request self-assessments to ensure supplier compliance. The Entity monitors its suppliers across one system. A variety of topics addressed in the Supplier Declaration are part of this system and are evaluated. Suppliers can be blocked if necessary. The Supplier Declaration is available at: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Supplier_Declaration_english.pdf
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented strict procedures to ensure it does not contribute in any way to Human Rights abuses in CAHRAs. To become a supplier to the Entity, it must accept the Supplier Declaration and confirm that it complies with the rules. With the Supplier Declaration, the Entity secures the possibility to undertake audits or inspections at the supplier, and to request self-assessments to ensure supplier compliance. The Entity monitors its suppliers in one system. Different topics as part of the Supplier Declaration are incorporated in this system and will be evaluated. Suppliers can be blocked if necessary. The Supplier Declaration is available at: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Supplier_Declaration_english.pdf
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity undertakes internal audits that address Due Diligence practices. Furthermore, the Entity's Due Diligence practices were audited as part of this ASI Performance Standard Audit.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	Whilst the Entity sources exclusively from their owners Novelis and Speira, Novelis reports annually on the management of responsible sourcing, which is available at: https://www.novelis.com/wpcontent/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf
9.9 Security practice	Conformance	The Entity does not employ armed security forces. During the Entity's Human Rights risk assessment, no specific risks related to security practices were identified. Worker interviews confirmed that there were no known Human Rights violations enacted by the security service.

10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	As confirmed by interviews with Worker representatives, Workers, and management as well as through document review, the Entity respects the rights of Workers to participate in Worker Unions, seek representation and join the Works Council without interference. A freely elected Worker representation is in place. The Entity respects the right to Collective Bargaining. Worker representatives and management have negotiated a comprehensive set of Collective Bargaining Agreements.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is not restricted in the country (Germany) where the Entity operates.
10.2a-c Child Labour	Conformance	The Entity has established Policies and complies with local regulations to avoid the hiring of Child Labour. The Entity has strict control over any potential Child Labour. The Entity does neither use nor support the use of Child Labour and does not engage in or support Hazardous Child Labour including the Worst Forms of Child Labour. Young Workers are employed for vocational education purposes only and if at all, work with hazardous substances occurs only under supervision.
10.3a-c Forced Labour	Conformance	The Entity neither engages in, nor supports the use of Forced Labour. The Entity does not engage in, nor supports Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and document review. A stand-alone Modern Slavery Statement is available at: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Erkl%C3%A4rung_zur_modernen_Sklaverei_2024.pdf
10.4a-c Non-Discrimination	Conformance	The Entity ensures equal opportunity for all and does not engage in nor supports 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 was confirmed by interviews and document review. Employment functions are classified in groups which are described in the Collective Agreement. The Policy on Combating Discrimination and Harassment is published at: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Richtlinie_zur_Bek%C3%A4mpfung_von_Diskriminierung_und_Bel%C3%A4stigung_2024.pdf The Policy is reviewed every five years, with the most recent review completed in 2024.
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. Multiple communication channels are implemented, and Workers are encouraged to raise concerns if and as they arise.
10.6a-g Violence and Harassment	Conformance	The Entity neither engages in, nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of

CRITERION	RATING	COMMENT
		<p>Workers. The Policy on Combating Discrimination and Harassment is published at: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Richtlinie_zur_Bek%C3%A4mpfung_von_Diskriminierung_und_Bel%C3%A4stigung_2024.pdf</p> <p>The Policy is reviewed every five years, with the most recent review completed in 2024.</p>
10.7a-c Remuneration	Conformance	<p>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. They are in accordance with the industry standard. As verified by document review and interviews during the assessment, the Entity's wage payments are timely, in legal tender and fully documented.</p>
10.8a-c Working Time	Conformance	<p>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 clock-in system is in place to record Working Time and records kept on file.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs Workers of their rights via different media, including information on the intranet and notice boards. The Works Council holds frequent public meetings. A complaints Management System for Workers has also been established.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Minor Non-Conformance	<p>The Entity has implemented an Occupational Health and Safety (OH&S) Management System that is certified to ISO 45001:2018 by an accredited certification body.</p> <p>However, during the Audit, risks associated with the incorrect loading of the crane and the use of an elevated work platform by a Contractor working on-site were identified.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity monitors lagging indicators including accidents, serious injury and fatalities, and near misses, and leading indicators including the number of Leadership tours and completed safety trainings. The Berufsgenossenschaft (German Industrial/Workplace Insurance organisation) undertake a comparative analysis of performance amongst peer Businesses to determine the annual insurance premium. The leading and lagging indicators and also a statement to comparative analyses are available at: https://www.alunorf.de/fileadmin/user_upload/Alunorf/Verantwortung/Sicherheit/Arbeitssicherheit_Alunorf_2024__2_.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has an OH&S Management System certified to ISO 45001:2018 by an accredited certification body. There have been no non-conformances identified in recent audits and recommendations have been adequately addressed. Employees are involved in the preparation of risk assessments. The Entity's Safety Officers have a</p>

CRITERION	RATING	COMMENT
		mandate in the regular OH&S Committee (held four times a year). Accidents are reported internally and externally to relevant parties.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	29 January 2019	Initial Certification Audit – Full Certification
1	22 December 2021	Re-Certification Audit – Full Certification Updated the Supply Chain Activities listed in Rev 0 to correctly represent the Certification Scope which included Aluminium Re-melting/Refining and Casthouse activities; Revision to the Member Name to remove 'Norsk Hydro' and include 'Speira' following an ownership transfer.
2	22 December 2024	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI PS V3; Removal of the Acquisition/Divestment information from the 'Overview' section as the Member's auditing obligations related to the transfer were satisfied at completion of the previous Re-Certification Audit; Corrections in this Document Control Table to the Date for Rev 0, and update to the Notes for Rev 1 to include the change in Member.