

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

NOVELIS DO BRASIL LTDA.

CERTIFICATE NUMBER

152

ASI STANDARD

PERFORMANCE
STANDARD
(V3 2022)

CERTIFICATION LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

DNV BUSINESS
ASSURANCE
SERVICES UK LTD

DATE OF ISSUE

16 SEPTEMBER 2024

DATE OF EXPIRY

15 SEPTEMBER 2025

CERTIFIED SINCE

16 SEPTEMBER 2021

AUTHORISED BY

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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

Novelis Office in São Paulo (Brazil), all activities at the Novelis Pindamonhangaba Facility (Brazil) for the production of flat-rolled Aluminium, the Cariacica Distribution Center (Brazil), and Collection Centers at Ananindeua, Bauru, Brasília, Campinas, Curitiba, Gravataí, João Pessoa, Juiz de Fora, Parnamirim, Pindamonhangaba, Recife, Salvador, São Gonçalo, São Paulo, and Sertãozinho (Brazil).

* Provisional Certification is valid for the period of one year, during which the company can address the non-conformances assessed and subsequently seek full certification.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis do Brasil LTDA.
CERTIFICATION SCOPE	Novelis Office in São Paulo (Brazil), all activities at the Novelis Pindamonhangaba Facility (Brazil) for the production of flat-rolled Aluminium, the Cariacica Distribution Center (Brazil), and Collection Centers at Ananindeua, Bauru, Brasília, Campinas, Curitiba, Gravataí, João Pessoa, Juiz de Fora, Parnamirim, Pindamonhangaba, Recife, Salvador, São Gonçalo, São Paulo, and Sertãozinho (Brazil).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial ConversionOther manufacturing or sale of products containing Aluminium
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (26 – 30 July 2021)Scope Change Audit (8 – 28 June 2022)Re-Certification Audit and Scope Change (2 July – 1 August 2024)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">26 – 30 July 2021 (Initial Certification Audit)8 – 28 June 2022 (Scope Change Audit)2 July – 1 August 2024 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">18 August 2021 (Initial Certification Audit)30 June 2022 (Scope Change Audit)8 September 2024 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (26 – 30 July 2021)</u></p> <p>The Audit Scope includes all activities at the Novelis facility in the city of Pindamonhangaba (Brazil) for the production of flat rolled Aluminium.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation)Other manufacturing or sale of products containing Aluminium <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Scope Change Audit (8 – 28 June 2022)

The Audit Scope includes the Novelis (Brazil) Recycling Collection Centres in Brazil at: Campinas Collection Center, Parnamirim Collection Centre, Pindamonhangaba Collection Center, Recife Collection Centre, Sertãozinho Collection Centre, São Paulo Collection Centre and João Pessoa Center.

The ASI multi-site sampling approach was undertaken to include the Ananindeua Collection Centre, Bauru Collection Center, Brasília Collection Centre, Curitiba Collection Centre, Juiz De Fora Collection Center, Salvador Collection Center, São Gonçalo Centre and the Cariacica Distribution Centre.

Supply chain activities included in the Audit Scope:

- Other manufacturing or sale of products containing Aluminium

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

Re-Certification Audit and Scope Change - Provisional (2 July – 1 August 2024)

The Audit Scope includes the Novelis Pindamonhangaba Facility and the Recycling Collection Centres at Ananindeua, Brasília, Curitiba, Juiz de Fora, and Salvador.

The Entity uses the ASI multi-site sampling approach and has added the Novelis Office and the Collection Centre at Gravataí into the Certification Scope.

Supply chain activities included in the Audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion
- Other manufacturing or sale of products containing Aluminium

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

AUDIT OUTCOME

- Provisional 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

16 September 2024 – 15 September 2025

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

15 March 2025

CERTIFICATE NUMBER

152



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://Aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Novelis Inc. is a leading producer of flat-rolled Aluminium and the world's largest Aluminium recycler. The Novelis do Brasil LTDA (the 'Entity'), includes the administrative office and Pindamonhangaba production plant, both located in the State of São Paulo, various Recycling Collection Centers located across Brazil and a Distribution Center in the State of Espírito Santo.

The Pindamonhangaba production plant is the company's largest facility in South America and produces Aluminium sheets for beverage cans and packaging markets. The Facility commenced operation in 1977 and its activities primarily include material recycling, plate remelting, hot rolling, cold rolling, coil finishing and packaging activities. Average annual production at the plant is 720,000 tonnes. The Facility employs over 1,500 workers.

The Pindamonhangaba plant is located in an industrial area in the Feital neighbourhood, São Paulo, and is over 2.3 kilometers from the community. The community includes two schools and some small businesses. The plant is strategically located 2,900 meters from a highway, with only access to small industries.

The Recycling Collection Centres are located in Ananindeua, Bauru, Brasília, Campinas, Curitiba, Gravataí, João Pessoa, Juiz de Fora, Parnamirim, Pindamonhangaba, Recife, Salvador, São Gonçalo, São Paulo, and Sertãozinho. Each Collection Center typically has between six to eight workers and these Facilities purchase, clean and compact Aluminium Scrap. The Distribution Centre is the Aluminium coils warehouse.

Novelis is investing R\$450 million to expand its plant in the city of Pindamonhangaba, in São Paulo. This investment aims to increase Aluminium laminate production capacity from 720 thousand to 750 thousand tons per year.

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	Medium	High	Medium	MEDIUM
RISKS	Medium	High	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

CRITICAL INCIDENT – JULY 2024

On 15 July 2024, a critical incident occurred at the Novelis Brazil Pindamonhangaba plant, which resulted in the fatality of a Worker. This incident occurred during the ASI Audit, which did not identify any Material issues or findings relating to the improper management of Occupational Health and Safety (OH&S) at the Facility. Despite some Minor Non-Conformances identified during the Audit, which are unrelated to the fatality incident, the Entity, including the Pindamonhangaba plant has, consistently demonstrated a medium to high implementation of and performance against its OH&S Management Systems.

The Audit Report makes no specific assessment, assumption or commentary on this incident, nor any system, processes or behaviours that may have contributed or be considered a possible cause. As at the issue of this revised Certification Audit Report, Local and Federal agencies in Brazil are continuing their investigations. In response to this incident, a Provisional Certification has been issued with a Surveillance Audit to be undertaken six months into the certification period (due by 15 March 2024) to allow the Lead Auditor to revise the Entity's implementation of its OH&S Management System in light of the investigation.

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented systems to maintain knowledge and ensure Compliance with Applicable Law, which is verified through external Audits. Legal requirements applicable to each Facility are monitored through the Entity's regulations Management System.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, including Extortion and Bribery, in accordance with Applicable Law and current international standards, and has implemented an Anti-Corruption Policy: https://pt-br.novelis.com/wp-content/uploads/2020/10/Pol%C3%81tica-Anticorrupc%C3%A7%C3%83o.pdf Detail on the Novelis Integrity Program are available at: https://pt-br.novelis.com/wp-content/uploads/2022/07/ATUAL_Programa-de-Integridade.pdf
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct, including relevant principles for Environmental, Social and Governance performance, available at: https://pt-br.novelis.com/wp-content/uploads/2022/02/Codigo-de-Conduto-Novelis.pdf Novelis Supplier Code of Conduct: https://pt-br.novelis.com/wp-content/uploads/2022/02/Codigo-de-Conduto-do-Fornecedor.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has developed, implemented, and maintains its Environmental, Social and Governance Policies. The Policies are communicated internally, through employee display boards, and externally through its website. Environment, Health, Safety and Quality Policy: https://pt-br.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf Novelis Environmental Reporting Directive: https://pt-br.novelis.com/wp-content/uploads/2024/01/Novelis-Environmental-Directive.pdf
2.2a-c Leadership	Conformance	The Entity has appointed the Quality Manager as the representative of Senior Management, with general responsibility and authority to ensure Compliance with the ASI Standards.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has implemented an Environmental Management System that is certified to the ISO 14001:2015 standard, valid until December 2025.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established a documented Social Management System, developed according to regional and corporate guidelines. Periodic monitoring is undertaken at the plant and regional levels for social performance. The Entity has defined and documented the Social Management System in the Social Responsibility Policy:

CRITERION	RATING	COMMENT
		https://pt-br.novelis.com/wp-content/uploads/2021/07/Pol%C3%8Itica-Responsabilidade-Social-NSA.pdf
2.4a-e Responsible Sourcing	Conformance	<p>The Novelis Integrity Program is based on preventing, detecting and correcting any situations or behaviours that violate or are suspected of violating the company policies and/or Applicable Law. The Entity has implemented a Responsible Purchasing Policy and established a series of initiatives related to Anti-Corruption, competition, Human Rights, gifts and entertainment, conflict of interest, whistleblower channel, and relationships with third parties, which apply to both employees and suppliers. The reporting channels are publicly disclosed in the 2023 Novelis South America Annual Report (Pages 14-15):</p> <p>https://online.fliphtml5.com/xtams/jbwx/#p=15</p> <p>The Responsible Sourcing Policy is available at: https://pt-br.novelis.com/wp-content/uploads/2024/07/Politica-de-Suprimentos-Divulgacao-Publica.pdf</p>
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>The Entity conducted an Impact Assessment via a specialist third party, which considered the environmental, social, cultural, and Human Rights impacts, and included a gender analysis associated with the proposed expansion at Pindamonhangaba Facility to increase production capacity. The Entity has developed a Change Management Procedure to manage the stages of Impact Assessment.</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity conducted an Impact Assessment via a specialist third party, which considered the environmental, social, cultural, and Human Rights impacts, and included a gender analysis associated with the proposed expansion at Pindamonhangaba Facility to increase production capacity. The Entity has developed a Change Management Procedure to manage the stages of Impact Assessment.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has prepared the Emergency Preparedness and Response Procedure for the production site, collection centres and distribution centres, developed in collaboration with potentially affected stakeholder groups and has been tested in a simulation as defined in the Emergency Simulation Schedule. The Entity has publicly disclosed the plan in its 2023 Annual Report (Page 35):</p> <p>https://online.fliphtml5.com/xtams/jbwx/#p=35</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity has developed a Crisis Management Plan to deal with situations in which it may have to suspend or significantly alter operations due to factors beyond its control, and which considers relevant adverse environmental, social and governance impacts.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has developed and implemented a Change Management Procedure for acquisitions and mergers processes; however, no such processes are currently in progress.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has developed and implemented a Change Management Procedure for closure, decommissioning and divestment processes. However, no such processes are currently in progress.</p>

CRITERION	RATING	COMMENT
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's approach to governance, environmental, social, and economic impacts is publicly available in the Novelis South America Annual Report 2023: https://online.fliphtml5.com/xtams/jbwx/#p=1
3.2 Non-compliance and Liabilities	Conformance	The Entity has publicly disclosed information on fines, judgments, penalties, and sanctions in the Novelis South America Annual Report 2023, page 16: https://online.fliphtml5.com/xtams/jbwx/#p=16
3.3a-c Payments to Governments	Conformance	The Entity does not make political contributions, and all payments to governments are made solely in the name of the Entity. The Entity is audited by a Third Party that verifies the financial payments and provides a clearance certificate for federal, state and municipal debts. https://investors.novelis.com/financial-information/balance-sheet
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented accessible, transparent, understandable, and culturally and gender-sensitive Complaints Resolution Mechanisms that are adequate to address Stakeholder complaints, grievances, and requests for information relating to its operations. This is accessible through links on the Entity's website and other local means. The requirements related to complaints and requests for information from interested parties related to its operations are addressed in the Whistleblower Channel Policy. The contact channels for the Novelis Ethics Hotline include telephone and email, and details are available at: www.linhaetica.com.br/etica/voxnovelis
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has developed a Cradle-to-Gate Life Cycle Assessment information on its products and/or lines containing Aluminium upon customer request. However, customers have not yet requested LCA information.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity is prepared to provide Cradle-to-Gate Life Cycle Assessment information on its products and/or lines containing Aluminium upon customer request. However, customers have not yet requested LCA information. The 2023 Sustainability Report (page 32) includes Novelis' activities related to LCA mapping, including public access to LCA information and its underlying assumptions, including system boundaries. https://pt-br.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability
4.2 Product Design	Conformance	The Entity integrates clear objectives into the Product design and development process to improve sustainability including the environmental life cycle impacts, of its final Products. As part of its strategy to improve Aluminium sourcing practices across its value chain the Entity has integrated recycled materials into its product portfolio.

CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a process in all lines to reduce the generation of Scrap and improve metal efficiency. The Scrap generated from hot and cold rolling and the laboratory samples is 100% re-used in the remelting furnace. The RAS (Run Around Scrap) flow was sighted, where it is possible to identify the Scrap collection points of each process and the forwarding of this Scrap to the service provider (with a 55% recovery rate). Scrap is separated by the types of alloys and a daily spectrometer analysis ensures there is no error in the type of Scrap sent to the re-melting furnaces.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has implemented a recycling strategy within its 15 can Collection Centres strategically located in several states of Brazil. The Entity's recycling targets in the Fiscal Year 2021 were 79.5%, 76% for the 2022 Fiscal Year and 78.7% for the 2024 Fiscal Year by 80%. More information is available in the 2023 Sustainability Report (Pages 31-32): https://pt-br.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity has demonstrated its commitment to collecting and recycling Aluminium from post-consumer products by implementing 15 collection centres of its own, supporting local entities for recycling End-of-Life and/or post-consumer products. The Entity has the Recycling program "Recycling League" which has vehicles that collect post-consumer cans from suppliers. It has demonstrated that its supplier has a study of post-consumer recovery at 99.7% (abralatas.org.br). For more information, please see: https://www.abralatas.org.br/wp-content/uploads/2023/09/RELATORIO_ESG_ABRALATAS_2024.pdf
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity has calculated its Material Greenhouse Gas (GHG) Emissions and disclosed the data, verified by a Third Party, in the 'Energy Matrix Mapping' described in the 2023 Novelis South America Annual Report (pages 23-26): https://online.fliphtml5.com/xtams/jbwx/#p=24 Independent assessor's report on page 63 and Management's Assertion on pages 64-65: https://pt-br.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability
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.

CRITERION	RATING	COMMENT
5.3a-e GHG Emissions Reduction Plans	Conformance	<p>The Entity has established a GHG Emissions Reduction Plan. It demonstrates a GHG Emissions Reduction Pathway consistent with a 1.5°C warming scenario, using the ASI GHG Pathways Method and the ASI GHG Calculation Tool. The Entity has used a 2017 baseline and includes an Intermediate Target for 2026, addressing all Direct and Indirect GHG emissions, as disclosed in the 2023 Novelis South America Annual Report (page 24): https://online.fliphtml5.com/xtams/jbwx/#p=24</p> <p>The scope of the Entity's GHG Pathway covers the Certification Scope [and also includes other activities across the Novelis Business, as allowed by the ASI Method].</p> <p>Novelis has a globally structured carbon neutrality target by 2050. The Entity has set a target to reduce absolute carbon emissions by 30% by FY26 from an FY16 baseline. The Entity in Brazil has calculated its absolute Scope 1 and 2 and has calculated its Scope 3 (Category 1 and 4) emissions as a whole Business Group per the GHG Protocol guidance. By the end of FY23, absolute emissions decreased by 14% compared to the FY16 baseline. The Entity has changed how it calculates its carbon footprint, following the equity approach outlined in the GHG Protocol for accounting for and reporting GHG emissions metrics.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented a Management System, evaluation Procedures and operational controls to achieve performance aligned with its GHG Emissions Reduction Plan and reduction targets. The actions include the replacement of the alumina box exchange system, automation of the lighting system and use of natural light, replacement of conventional lighting with LED in production areas, application of frequency inverters, optimisation of the logic of Holders furnaces, use of artificial intelligence to improve processes and continuous improvement projects to reduce furnace cycle time. For further information on the Entity's actions to reduce GHG emissions, refer to the 2023 Annual Report – South America (pages 23-26): https://online.fliphtml5.com/xtams/jbwx/#p=24</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity identifies, assesses, and quantifies its Material Emissions to Air from its activities, implements control plans to minimise exposure to, and impacts from, Emissions to Air, monitors the effectiveness of the control plans periodically, and reviews the control plans both regularly and upon any changes to risk or non-compliance with emissions limits.</p> <p>Further information is available in the Novelis South America Annual Report (Pages 25-26): https://online.fliphtml5.com/xtams/jbwx/#p=24</p> <p>Novelis Sustainability Report (Pages 59-60): https://pt-br.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity has developed and implemented Policies, systems, Procedures, and processes for Discharges to Water. The Entity has obtained ISO 14001 certification, complies with legal requirements for Discharges to Water, and publicly discloses its pollutant discharge</p>

CRITERION	RATING	COMMENT
		<p>information and the control plan in the Novelis South America Annual Report (Page 23): https://online.fliphtml5.com/xtams/jbwx/#p=22</p> <p>and the 2023 Novelis Sustainability Report (Pages 10, 28 and 57): https://pt-br.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has assessed its risk areas of operations where Spills and Leakages may contaminate air, water, or soil. A Management Plan has been implemented and is reviewed periodically or after a Spill/Leakage event or major Business change. Further information is available in the Novelis South America Annual Report (Pages 23, 34, and 35): https://online.fliphtml5.com/xtams/jbwx/#p=22</p> <p>and the 2023 Novelis Sustainability Report (Pages 10, 28 and 57): https://pt-br.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf?utm_source=download&utm_medium=download&utm_campaign=sustainability_report_2023&utm_id=sustainability</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has publicly disclosed Spills and Leakage risk identification and assessment results in the Novelis South America Annual Report (Pages 34 and 35). There have been no Spills or Leakage events to date. https://online.fliphtml5.com/xtams/jbwx/#p=22</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has a documented Standard Operating Procedure that addresses Hazardous and Non-Hazardous Wastes and maps them to different processing activities. The Waste Management Plan lists the responsibilities of personnel and covers environmental aspects and impacts. The Entity reports annually to the Government authorities by providing a waste summary. All waste types and quantities are reported and disclosed annually In the Novelis South America Annual Report (Pages 25-26): https://online.fliphtml5.com/xtams/jbwx/#p=26</p> <p>However, the Waste Management Plan does not include all the wastes generated at some of the Collection Centres.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity's Dross is stored on-site in accordance with legal and permitting requirements. The Entity maintains Scrap statistics, which are documented in the annual waste report. The Dross is sent to an external service provider for treatment, where the Aluminium is recovered and recycled. No Dross is sent to landfill.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Pindamonhangaba site sources water from the Rio Preto Dam, three artesian wells and treated water from the State's Public System.

CRITERION	RATING	COMMENT
		<p>The Entity monitors its water consumption monthly and demonstrates that consumption is less than the limits permitted, including the volume of water reused via the reverse osmosis system. The other Novelis Brasil sites source water from public service provisions.</p> <p>Novelis has undertaken studies with the ECO Foundation, to identify the various threats to life in the Rio Preto micro basin. A study was completed in 2021 considering public data mainly from CEIVAP - Committee for Integration of the Paraíba do Sul River Watershed (http://www.ceivap.org.br). A Risk Matrix has been developed to study the consumption of subterranean water and surface water, with changes in the quality of ground and surface water and quality of the Entity's Effluents Treatment Station leaving water and quantity of abstraction identified as significant environmental impacts. Further information is available in the Novelis South America Annual Report (Page 19): https://online.fliphtml5.com/xtams/qajv/?search=ind%C3%AD#p=19</p>
7.2a-e Water Management	Conformance	<p>Based on the Risk Matrix, developed using the CEIVAP public data, the Entity developed an Action Plan for the Pindamonhangaba site to reduce water consumption and defined implementation timeframes and responsibilities for mitigation actions. See Novelis South America Annual Report (Pages 19-22) for more information: https://online.fliphtml5.com/xtams/jbwx/#p=19</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has conducted Environmental and Social Impact Assessments that address the potential risks to Biodiversity. It has developed a Biodiversity Action Plan to prevent or mitigate Biodiversity loss, contribute to remediation, identify the business opportunities arising from Biodiversity management, respect the Biodiversity Mitigation Hierarchy, address any Biodiversity risks identified, and respond to regulatory requirements. Biodiversity objectives have been developed and actions necessary to preserve/increase the value of Biodiversity are outlined in the Novelis South America Annual Report, pages 28-32: https://online.fliphtml5.com/xtams/jbwx/#p=28</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	<p>The Entity has implemented the Biodiversity Management Procedure - Natural Resources and developed a Biodiversity Aspects and Impacts Identification Matrix, which demonstrates that the Entity has a low impact on the Ecosystem Services.</p>
8.2a-g Biodiversity Management	Conformance	<p>The Entity has developed a Biodiversity Action Plan that includes ten priority actions to be completed by December 2025. The Entity has implemented an Environmental Monitoring Plan that requires an annual Biodiversity survey and commits the Entity to undertaking an additional Biodiversity study to assess the outcome of the Biodiversity Action Plan.</p>
8.3a-c Management of Priority Ecosystem Services	Conformance	<p>The Entity has implemented the Biodiversity Management Procedure - Natural Resources and developed a Biodiversity Aspects and Impacts Identification Matrix, which demonstrates that the Entity has a low impact on the Ecosystem Services.</p>

CRITERION	RATING	COMMENT
8.4 Alien Species	Conformance	The Entity proactively prevents the accidental or deliberate introduction of Alien Species that may have significant adverse impacts on Biodiversity.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Conformance	The Entity demonstrated through the Biodiversity Management Procedure – Natural Resources, the Biodiversity Aspects and Impacts Identification Matrix, and the Biodiversity and Ecosystem Services Study, that it does not have, nor explores or develops New Projects in World Heritage Properties.
8.6a-d Protected Areas	Conformance	The Entity demonstrated through the Biodiversity Management Procedure–Natural Resources, the Biodiversity Aspects and Impacts Identification Matrix and the Biodiversity and Ecosystem Services Study, that it has a permanent preservation area, a conservation and mitigation plan, and complies with regulations, agreements, and other legal requirements assigned to these Protected Areas. Further information is available in the 2023 Novelis South America Annual Report (pages 29-31): https://online.fliphtml5.com/xtams/jbwx/#p=29
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 respects and supports individual and collective Human Rights and is committed to assessing, preventing and remedying potential adverse impacts on Human Rights in a way consistent with international instruments on Human Rights. The Entity has implemented a Human Rights Due Diligence process, which includes a Risk Assessment for Human Rights issues and a relevance matrix to map the impact and importance of communities within the Area of Influence. The Entity has established a commitment to Human Rights through its Policy: https://pt-br.novelis.com/wp-content/uploads/2020/10/Política-de-Direitos-Humanos.pdf Code of Conduct: https://pt-br.novelis.com/wp-content/uploads/2022/02/Codigo-de-Conduita-Novelis.pdf
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a Human Rights Policy, guaranteeing respect for the rights and interests of women and preventing all forms of Discrimination against women. The Entity maintains the EQUAL Diversity Program, a Novelis South America initiative aimed at being a catalyst for attracting, inspiring and empowering women and encouraging gender equality among professionals. The Entity has detailed its commitment to increase the participation of women in full-time positions by 50% and in casual positions by 33% In the Novelis South America Annual Report (Pages 6-8): https://online.fliphtml5.com/xtams/jbwx/#p=6
9.3a-i Indigenous Peoples	Minor Non-Conformance	The Entity has established both a Code of Conduct and a Human Rights Policy, affirming its commitment to respecting Human Rights

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		<p>and recognising the importance of preserving and respecting cultural diversity, including the rights of Indigenous Peoples. The Entity has researched and identified the geographic areas where Indigenous communities have a historical or current presence. The Human Rights Policy is available at: https://pt-br.novelis.com/wp-content/uploads/2020/10/Política-de-Direitos-Humanos.pdf</p> <p>Code of Conduct: https://pt-br.novelis.com/wp-content/uploads/2022/02/Codigo-de-Conduita-Novelis.pdf</p> <p>However, the Entity's position on respect for traditional populations and/or Local Communities is not documented in the Policies.</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples within the Entity's Area of Influence.
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 there are no Indigenous Peoples within the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no records of cultural or sacred heritage sites or values within the Entity's Area of Influence.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as there are no records of cultural or sacred heritage sites or values within the Entity's Area of Influence.
9.6a-i Displacement	Conformance	The Entity has conducted a Due Diligence assessment with a third-party to consider the environmental, social, cultural, and Human Rights impacts, and included a gender analysis for New Projects and Major Changes to existing Facilities. No physical or economic displacement were identified during the Due Diligence. However, the Entity has implemented a Change Management Procedure to develop the stages of Impact Assessment.
9.7a-h Affected Populations and Organisations	Conformance	The Entity respects and supports individual and collective Human Rights affected by its operations and is committed to assessing, preventing and remedying potential adverse impacts in a way consistent with international instruments on Human Rights in the Social Responsibility Policy: https://pt-br.novelis.com/wp-content/uploads/2021/07/Política-Responsabilidade-Social-NSA.pdf
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	The Entity has implemented an Integrity Program with the principle to prevent, detect and correct any situation or behaviour that violates or is suspected of violating the Entity's Policies and Applicable Laws. The Entity has a Responsible Purchasing Policy, and a series of initiatives

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		<p>related to Anti-Corruption, competition, Human Rights, gifts and entertainment, conflict of interest, a reporting channel, Conflict-Affected, High-Risk Areas, relationships with Third Parties and social responsibility, which apply to both employees and its suppliers. The Novelis Supplier Code of Conduct is available at: https://pt-br.novelis.com/wp-content/uploads/2024/01/PRB_Novelis-Supplier-Code-of-Conduct-120523.pdf</p> <p>Supplier Policy: https://pt-br.novelis.com/wp-content/uploads/2024/07/Politica-de-Suprimentos-Divulgacao-Publica.pdf</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity's Aluminium suppliers undergo a Due Diligence process by including data and evidence in a Supplier Approval platform, "G-Certifica", which includes the assessment of Conflict-Affected and High-Risk Areas.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable to the Entity, as it does not source from CAHRAS and does not present risks.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Due Diligence practices were audited as part of this ASI Audit, which meets the requirements for this Criterion.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity has an Integrity Program whose principles are the prevention, detection and correction of any situations and/or behaviours that violate or are suspected of violating the Entity's policies and applicable laws and following the OECD Due Diligence Guidance on Minerals from Conflict-Affected and High-Risk Areas. The Entity has demonstrated that all suppliers containing Aluminium undergo a Due Diligence process by including data and evidence in a Supplier Approval platform, including the assessment of Conflict-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity has developed and implemented private property security protocols that respect employees' Human Rights per recognised standards and good practices. Security personnel are provided with training in respecting Human Rights. The Entity has demonstrated that it respects Human Rights in its engagement with private security providers, including internal and public.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the Workers' right to freely associate with the Union and to Collectively Bargain, as defined in the Code of Conduct and the Human Rights Policy and confirmed through interviews with the Workers.
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 it operates in a country that does not restrict Freedom of Association and allows Union Agreements.

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10.2 Child Labour	Conformance	The Entity does not tolerate the use of Child Labour directly or indirectly at any stage of its production and/or administrative process. It has demonstrated that during the hiring process of workers, their age is verified and confirmed through personal documents. In addition, visitors and/or service providers must present an original identification document with a photo to access the Entity's facilities.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity does not require any form of deposit or Recruitment Fee to hire Workers directly or indirectly at any stage. The Entity does not restrict the freedom of movement of Workers in the workplace. The Entity does not keep original identity/travel documents or worker training certificates. The Entity does not deny Workers the freedom to terminate their employment contract at any time, without penalty, upon notice within a reasonable period or defined in the employment contract. The Entity is not engaged in nor supports Forced Labour, either directly or indirectly, through any employment or recruitment agencies. The Entity's Statement on Forced Labour is disclosed in the 2023 Novelis South America Annual Report (page 14): https://online.fliphtml5.com/xtams/jbwx/?search=conflito#p=14 However, the Entity has not updated and made publicly available a Modern Slavery Statement that details its actions to combat modern slavery.
10.4a-c Non-Discrimination	Conformance	The Entity guarantees equal opportunities and does not engage in nor support Discrimination in the hiring, salary, promotion, training, promotion opportunities, or termination of any Employee based on gender, race, national or social origin, religion, disability, affiliation politics, sexual orientation, marital status, family responsibilities, age, or any other condition that may give rise to Discrimination. Since 2018, the entity has run an initiative following the ONU Women's Empowerment Principles to encourage gender equality among professionals. In November 2017, it signed a commitment to encourage inclusion and promote racial equality in the company. The Entity also holds sectoral meetings and workshops on discrimination to engage all workers in the issue's importance and sensitivity.
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 through the Joint Committee for the Prevention of Accidents and Harassment in the Workplace, reporting channel, web pages, office posters, intranet pages, letters, contracts, sustainability, annual reports and interviews. https://pt-br.novelis.com/wp-content/uploads/2023/11/Politica-do-Canal-de-Denuncias.pdf
10.6a-g Violence and Harassment	Conformance	The Entity does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, Harassment and gender violence, including sexual harassment or verbal abuse of Workers. The Entity has implemented systems, Policies, and procedures to manage issues and provide training relating to disciplinary practices. In consultation with the Workers and their representatives, the Entity has developed a Policy against Violence and Harassment in the workplace. A communication channel is available where complaints are directed to senior management. Employees or third parties who

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		<p>know or suspect that a violation of this Policy has occurred can contact the Entity's Compliance Department or the Ethics Line.</p> <p>Human Rights Policy: https://pt-br.novelis.com/wp-content/uploads/2020/10/Política-de-Direitos-Humanos.pdf</p>
10.7a-d Remuneration	Conformance	The Entity respects the Workers' rights to a decent minimum wage and wages are paid monthly in accordance with the Collective Trade Union Convention, as confirmed during Worker interviews.
10.8a-c Working Time	Minor Non-Conformance	The Entity respects Workers' right to weekly working hours as agreed in the Collective Trade Union Convention. However, during the Audit, it was evident that some Workers worked hours (daily) in excess of the Brazilian legislation.
10.9a-b Informing Workers of Rights	Conformance	The Entity demonstrates that all Workers undergo training upon admission to the workplace and periodically undergo refresher training, updating them on their rights, duties, right of refusal, and Labour Rights.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Major Non-Conformance	<p>The Entity has an Occupational Health and Safety Management System that meets national and international standards and is certified against ISO 45001.</p> <p>However, Minor Non-Conformances were identified during the Audit at different Collection Centres, including: 1. The Solid Waste Management Plan does not include all the waste generated at the Collection Centres; 2. The safety training had expired or was carried out late in the Collection Centres. 3. Failure to inspect some emergency equipment in the Collection Centres.</p> <p>Furthermore, a Major Non-Conformance was raised related to a fatality incident at the Pindamonhangaba Facility. Please refer to page 5 of this Report for context on the incident that occurred on July 15, 2024.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity's OH&S Management System is certified against ISO 45001 and is reviewed and updated periodically. The Entity discloses the tools, commitments and results of the effectiveness of its OH&S Management System in the Novelis South America Annual Report 2023 (Pages 9-11):</p> <p>https://online.fliphtml5.com/xtams/jbwx/?search=conflito#p=11</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity provides Workers with an Internal Accident Safety Committee to raise, discuss and participate in resolving Occupational Health and Safety issues. Further information is available in the Novelis South America Annual Report 2023 (Page 11):</p> <p>https://online.fliphtml5.com/xtams/jbwx/?search=conflito#p=11</p>

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	16 September 2021	Initial Certification Audit – Full Certification
1	15 August 2022	Scope Change Audit – Certification Scope updated to include Novelis (Brazil) Recycling Collection Centres in Brazil: Ananindeua Collection Centre, Bauru Collection Centre, Brasília Collection Centre, Campinas Collection Center, Curitiba Collection Centre, Collection Centre Juiz De Fora, Parnamirim Collection Centre, Pindamonhangaba Collection Center, Recife Collection Centre, Salvador Collection Center, Sertãozinho Collection Centre, São Paulo Collection Centre, João Pessoa Centre, São Gonçalo Centre and Cariacica Distribution Centre.
2	22 November 2024	Re-Certification Audit and Scope Change – Provisional Certification Scope Change to apply ASI PS V3, including a revision to the supply chain activity title to 'Material Conversion'; Scope Change to include the Novelis Office and the Gravataí Collection Center; Update to Certification Scope to alphabetise the Collection Centers.