

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# NOVELIS NORTH AMERICA - OSWEGO

CERTIFICATE  
NUMBER

323

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

25 OCTOBER 2023

DATE OF EXPIRY

24 OCTOBER 2026

CERTIFIED SINCE

25 OCTOBER 2023

AUTHORISED BY

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

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](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

The remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing of aluminium products at the Novelis Oswego Works Mill, NY (USA).

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME Novelis Inc.

ENTITY NAME Novelis North America - Oswego

CERTIFICATION SCOPE The remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing of Aluminium products at the Novelis Oswego Works Mill, NY (USA).

SUPPLY CHAIN ACTIVITIES

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

ASI STANDARD

- Performance Standard V2

AUDIT TYPE

- Initial Certification Audit (1 – 5 May 2023)
- Surveillance Audit (19 – 20 November 2024)

AUDIT FIRM DNV Business Assurance Services UK Ltd.

AUDIT DATE

- 1 – 5 May 2023 (Initial Certification Audit)
- 19 – 20 November 2024 (Surveillance Audit)

AUDIT REPORT SUBMISSION

- 15 August 2023 (Initial Certification Audit)
- 14 January 2025 (Surveillance Audit)

AUDIT SCOPE 1 – 5 May 2023 (Initial Certification Audit)  
The Audit Scope includes the remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing of Aluminium products at the Novelis Oswego Works Mill, NY.

The 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.

---

19 – 20 November 2024 (Surveillance Audit)

The Audit Scope includes the remelting, recycling, casting, hot mill rolling, cold mill rolling, and coil finishing of Aluminium products at the Novelis Oswego Works Mill, NY.

The supply chain activities included in the Audit Scope:

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

Selected criteria in the ASI Performance Standard relating to previous non-conformances and other issues considered Material to the Entity 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

25 October 2023 – 24 October 2026

---

NEXT AUDIT  
TYPE

Re-Certification Audit

---

NEXT AUDIT  
DUE DATE

24 October 2026

---

CERTIFICATE  
NUMBER

323

---

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented an adequate system to monitor and comply with the applicable legal requirements. The applicable periodic OHS&E legal requirements are listed in a calendar to ensure knowledge and follow-up. Legal reviews are performed through the 'Enhesa tool' and internal audit process. A legal team from Novelis Corporate is available to provide support to the Entity.
1.2 Anti-Corruption	Conformance	The Entity has established and implemented an Anti-Bribery and Corruption Policy and a Code of Conduct, including principles relevant to anti-Corruption, Bribery, conflict of interest, gifts and donations. This also includes an approbation process for any contributions. The Entity's Code of conduct is available at: <a href="https://www.novelis.com/download/code-of-conduct/">https://www.novelis.com/download/code-of-conduct/</a>
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct, including principles relevant to environmental, social, and governance performance. For more information, refer to: <a href="https://www.novelis.com/?s=code+of+conduct&amp;post_type=download">https://www.novelis.com/?s=code+of+conduct&amp;post_type=download</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented Policies consistent with environmental, social, and governance practices. For more information refer to: <a href="https://www.novelis.com/?s=policy&amp;post_type=page">https://www.novelis.com/?s=policy&amp;post_type=page</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has implemented a document control system, and it was evidenced that the senior management have endorsed and support the Policies through the availability of resources and undertaking periodic review. For more information refer to: <a href="https://www.novelis.com/?s=policy&amp;post_type=page">https://www.novelis.com/?s=policy&amp;post_type=page</a>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Employees are trained and undergo annual refresher training on the environmental, social and governance Policies. Other evidence of communication is posted throughout the Facility. The Policies are available on the Novelis website: <a href="https://www.novelis.com/?s=policy&amp;post_type=page">https://www.novelis.com/?s=policy&amp;post_type=page</a>

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	A senior Management Representative has been nominated as having overall responsibility and authority for ensuring conformance with the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity is certified to ISO 14001:2015 with a certificate valid until April 2027. There is a documented Environmental Management System (EMS) comprising of environmental Policies, procedures and records. Environmental impacts are assessed and documented in a detailed and comprehensive environmental aspect registry and operational procedures, controls and an internal audit program are established.
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has established different Policies to ensure social impacts are mitigated. The Code of Conduct has strict requirements for workplace ethics and respect of Workers rights. The Supplier Code of Conduct also ensures the labour rights of suppliers and their Workers are respected.</p> <p>The Novelis Corporate has developed a report in 2024 on fighting against Forced Labour and Child Labour in supply chains available at: <a href="https://www.novelis.com/wp-content/uploads/2024/06/Novelis-Inc.-Report-for-FY-2024-on-Fighting-Against-Forced-Labour-and-Child-Labour-in-Supply-Chains.pdf">https://www.novelis.com/wp-content/uploads/2024/06/Novelis-Inc.-Report-for-FY-2024-on-Fighting-Against-Forced-Labour-and-Child-Labour-in-Supply-Chains.pdf</a></p> <p>The Entity has established a number of Employee Resource Groups to support employees. BREATH ERG program aims to address the deeper challenges facing Black employees. The PROUD ERG for LGBTQIA2S+ members and allies at events within and outside Novelis with a focus on strengthening the support network. In 2023-24, Woman in Novelis (WiN) hosted an educational series on the needs and challenges of female employees.</p> <p>A Corporate Social Responsibility Program is implemented to benefit Local Communities through donations and charities such as STEM education, volunteering, charities and ecosystem development.</p>
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented a Responsible Purchasing Policy and a Supplier Code of Conduct addressing environmental, social, and governance issues. All suppliers must participate in a well-defined onboarding process that includes engagement toward the Novelis Supplier Code of Conduct. A risk assessment process as well as mitigation measures and monitoring measures are implemented. For more information, refer to:</p> <p><a href="https://www.novelis.com/suppliers/">https://www.novelis.com/suppliers/</a></p>

CRITERION	RATING	COMMENT
2.5 Impact Assessments	Conformance	<p>The Entity has implemented a sustainability framework that includes a Technical Standard for Conducting Environmental and Social Impact Assessments. This Standard aims to predict and evaluate the significance of beneficial and adverse impacts to the environment and people from a proposed New Projects or Major Changes.</p> <p>At the time of the Audit, no Major Changes or New Projects took place within the last year nor are planned in the years ahead.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has developed a comprehensive Emergency Response Plan that addresses several scenarios. This Plan defines responsibilities, training requirements, drills, communications and the provision of emergency equipment.</p> <p>The Plan is elaborated upon, reviewed periodically and communicated to relevant interested parties as required.</p>
2.7 Mergers and Acquisitions	Conformance	Any merger and/or acquisition activities at the Entity are managed by Novelis Corporate.
2.8 Closure, Decommissioning and Divestment	Conformance	Any closure, decommissioning and divestment activities at the Entity are managed by Novelis Corporate.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity's Sustainability Reports are publicly communicated and summarise the environmental, social, and governance (ESG) approaches implemented. The Sustainability Reports are published annually for each fiscal year, with the latest version available online at:</p> <p><a href="https://www.novelis.com/sustainability/">https://www.novelis.com/sustainability/</a></p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity includes information on fines, prosecutions, penalties and sanctions which are publicly disclosed on the US Environmental Protection Authority (EPA) website for Enforcement and Compliance History Online (ECHO)::</p> <p><a href="https://echo.epa.gov/facilities/facility-search/results">https://echo.epa.gov/facilities/facility-search/results</a></p>
3.3a Payments to governments (legal and contractual)	Conformance	All operational taxes and fee payments are made only on behalf of the Entity. The Entity has implemented a step-by-step procedure for analysing, approving and making payments to the Government, in accordance with the Anti-Corruption Policy.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented accessible, transparent, understandable and gender and culturally sensitive grievance mechanisms suitable for dealing with grievances and requests for information from Stakeholders related to its operations. For more information refer to: <a href="https://www.novelis.com/suppliers/ethics-line-vox-novelis/">https://www.novelis.com/suppliers/ethics-line-vox-novelis/</a>

PRINCIPLE 4 MATERIAL STEWARDSHIP

4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity publicly discloses the environmental Life Cycle Assessment through the report prepared by the Aluminum Association which is relevant to the Entity's products. For more information refer to: <a href="https://www.aluminum.org/">https://www.aluminum.org/</a>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity publicly discloses the environmental Life Cycle Assessment through the report prepared by the Aluminum Association which is relevant to the Entity's products. For more information refer to: <a href="https://www.aluminum.org/">https://www.aluminum.org/</a>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The original production data (primary data) of each individual unit process was directly collected either by the Aluminum Association (AA) or the International Aluminium Institute (IAI), from more than 100 production facilities representing a large majority of the industry in Canada and the United States.
4.2 Product design	Conformance	Documentation of the closed loop process and observation of the process was undertaken during the audit. However, design records and other documentation are confidential.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity's Scrap Recovery Overview includes Batch Annealing with scrap. The current target scrap recovery is 80%.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity's plant-level scrap process includes alloy recycle percentage to prime alloy percentage.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has implemented a recycling strategy, which includes specific timelines, activities and targets.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has engaged with local, regional or national collection and recycling systems to support accurate measurement and efforts to increase recycling rates for their Products containing Aluminium.

PRINCIPLE 5 GREENHOUSE GAS EMISSIONS

CRITERION	RATING	COMMENT
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity accounts for and calculates GHG emissions using data provided by all Facilities. The energy use and GHG emissions are reported monthly to the Novelis Corporate Center which are aggregated and disclosed in the Novelis Sustainability Report, which is available at: <a href="https://www.novelis.com/sustainability">https://www.novelis.com/sustainability</a>
5.2 GHG emissions reductions	Conformance	The Entity has developed annual GHG energy and emissions targets, which are publicly disclosed within the Novelis Sustainability Report, which is available at: <a href="https://www.novelis.com/sustainability">https://www.novelis.com/sustainability</a> Novelis has committed to a 10% energy reduction and a 30% reduction in carbon footprint by 2026 against a 2016 baseline. A reduction plan has been documented that includes projects and actions to ensure goals are achieved, which also articulates Novelis' GHG emissions reduction target of 'Vision 3x30'.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity quantifies and reports emissions to the atmosphere that have adverse effects on humans or the environment, being available through the Freedom of Information Act (FOIA). This is defined in the Operation, Maintenance and Monitoring Plan procedure, defining the planning to minimise the adverse impact generated to the environment.
6.2 Discharges to Water	Conformance	The Entity has completed an assessment of the main risk areas of operations where Spills and Leakage can contaminate the air, water and / or soil via an Environmental Aspects/Safety HIRARC Inventory. This demonstrated that the water discharge, when undertaken is properly treated by the Effluent Treatment system, meeting the pre-defined parameters.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has undertaken an assessment of the main risk areas of operations where Spills and Leakage can contaminate the air, water and/or soil through a Spill



CRITERION	RATING	COMMENT
		Prevention, Control and Response Performance Standard procedure.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented the management plan and external communication, compliance controls and monitoring program to prevent and detect Spills and Leakage through the Spill Prevention, Control and Response Performance Standard procedure. No spill situation that has caused any kind of impact has been identified.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented the management plan and external communication, compliance controls and monitoring program to prevent and detect Spills and Leakage through the Spill Prevention, Control and Response Performance Standard procedure. No spill situation has been identified, which caused any type of impact and need for external communication.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented the management plan and external communication, compliance controls and monitoring program to prevent and detect Spills and Leakages through the Spill Prevention, Control and Response Performance Standard procedure. No spill situation has been identified, which caused any type of impact and need for external communication.
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy and the Entity's Waste Management Program Procedure.</p> <p>The Entity's waste minimisation plan defines detailed waste streams including the management and mitigation of Hazardous and Non-Hazardous Waste. Novelis has set a goal to reduce by 20% waste sent to landfill by 2026. All goals and achievements towards it are disclosed in the Novelis Sustainability Report available at:</p> <p><a href="https://www.novelis.com/sustainability/sustainability-report">https://www.novelis.com/sustainability/sustainability-report</a></p>
6.5b Waste management and reporting (disclosure)	Minor Non-Conformance	The Entity accounts for each type of waste generated monthly through the Power BI dashboard, including both Hazardous and Non-Hazardous Waste. The Novelis Sustainability Report provides aggregated site data and performance against waste reduction goals. However, there is currently no evidence that Novelis has publicly disclosed the amount of Hazardous and Non-Hazardous Waste generated and associated waste disposal methods, as only the total landfilled wastes are disclosed in the report.

CRITERION	RATING	COMMENT
		General waste data are available in the Novelis Sustainability Report at: <a href="https://www.novelis.com/sustainability/sustainability-report">https://www.novelis.com/sustainability/sustainability-report</a>
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	The Entity maximises the recovery of Aluminium through the treatment of Dross by contracted companies.
6.8b Dross (recycling)	Conformance	The Entity segregates Dross to improve Aluminium recovery and minimise Dross residue generation by contracted companies.
6.8c Dross (review of alternatives)	Conformance	The Entity has defined within a 'Third Party Dross Processing' project, a study to evaluate alternative options to reduce the use of landfill for slag residues.

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	The Entity has identified and mapped water use by source and type. The water balance includes water withdrawals, discharge and consumption.
7.1b Water assessment (risk assessment)	Conformance	The Entity has evaluated the risks related to water in Watersheds in the Entity's Area of Influence through the Watershed Assessment Report, and the data for risk assessment were extracted from: <a href="https://www.wri.org/aqueduct">https://www.wri.org/aqueduct</a> The result of the risk assessment indicates the risk is low..
7.2a Water management (management plans)	Conformance	The result of the Entity's risk assessment related to water in hydrographic basins in the Entity's Area of Influence indicates the risk is low. However, the Entity monitors its water use monthly for reporting.
7.2b Water management (monitoring)	Conformance	The result of the Entity's risk assessment related to water in hydrographic basins in the Entity's Area of Influence indicate the risk is low. However, the Entity monitors its water use monthly for reporting.
7.3 Disclosure of water usage and risks	Conformance	The Entity has evaluated the risks related to water in watersheds in the Entity's Area of Influence, through the Watershed Assessment tools. No Material risks to watersheds were identified. Water withdrawal and usage are accounted for monthly by the Entity via the Sustainability Dashboard. Water data are aggregated by Novelis Corporate and are published in the Novelis Sustainability Report: <a href="https://www.novelis.com/sustainability">https://www.novelis.com/sustainability</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has assessed the risks related to the materiality of impacts on Biodiversity from land use and activities in the Entity's Area of Influence through an Ecological Footprint Report. The report provides a summary of the site's regional ecology.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has evaluated the risks of local activities on Biodiversity and appropriate and preventive action plans were developed in the Biodiversity Risk Assessment data sheet. The Entity's third party biodiversity assessment is used to develop future action plans with time-bound targets.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has evaluated the risks of local activities on Biodiversity and appropriate and preventive action plans were developed in the Biodiversity Risk Assessment data sheet.

CRITERION	RATING	COMMENT
		The Entity's third party biodiversity assessment is used to develop future action plans with time-bound targets.
8.2c Biodiversity management (reporting)	Conformance	The action plan developed demonstrates that the Entity has established positive impact actions for the improvement and conservation of Biodiversity. The Entity will publicly disclose outcomes in the next edition of the Sustainability Report.
8.3 Alien Species	Conformance	The Entity has developed a Biodiversity Action Plan that addresses the prevention of accidental or deliberate introduction of Alien Species that may have significant adverse impacts on biodiversity.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has developed a commitment to Human Rights by adhering to the UN Global Compact in 2011, through the Code of Conduct and the supplier Code of Conduct. The Code of Conduct is available at: <a href="https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf">https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</a> The Entity's Supplier Code of Conduct is available at: <a href="https://www.novelis.com/suppliers">https://www.novelis.com/suppliers</a>
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	The Entity has developed the Environmental, Social and Human Rights Due Diligence to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights in case of a project or Major Changes. However, there is currently no evidence that the Human Rights Due Diligence process identifies actual and potential impacts in accordance with the UN Guiding Principles on Business and Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has demonstrated that it has not caused nor contributed to adverse impacts on Human Rights.

CRITERION	RATING	COMMENT
9.2 Women's Rights	Conformance	<p>The Entity has implemented a Working Committee to ensure respect for the rights and interests of women, in accordance with international standards, including the United Nations Convention on the Elimination of All Forms of Discrimination Against Women. For more information refer to:</p> <p><a href="https://www.youtube.com/watch?v=erylpgRTVks">https://www.youtube.com/watch?v=erylpgRTVks</a></p> <p>The Entity is committed to increasing women in the workplace by 35%.</p>
9.3 Indigenous Peoples	Conformance	<p>The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure respect for the rights and interests of Indigenous Peoples, in accordance with international standards, including ILO Convention 169 and the United Nations Declaration on the Rights of Indigenous Peoples, after mapping the indigenous communities.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>The Entity has implemented a Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure consultation and good faith cooperation with Indigenous Peoples when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated with and living on the relevant lands.</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has implemented a Land Acquisition, Resettlement, and Livelihood Restoration Policy, relevant to when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated with and living on the relevant lands.</p> <p>The Entity in consultation with the affected Communities always cooperates to identify cultural or sacred heritage sites and values within the Area of Influence and take appropriate measures to avoid or remedy the impacts, as well as to guarantee continued rights of access to such sites or values.</p>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity has implemented a Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure that when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated and living on the relevant lands, viable alternatives are considered to avoid or minimise physical and/or economic displacement, while balancing environmental, social and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable, including women.</p>

CRITERION	RATING	COMMENT
9.6b Resettlements (where unavoidable)	Conformance	The Entity has implemented a Land Acquisition, Resettlement and Livelihood Restoration Policy, to ensure that when New Projects or Major Changes to existing projects may have significant impacts on Indigenous Peoples culturally associated and living on the relevant lands, viable alternatives are considered to avoid or minimise physical and/or economic displacement, while balancing environmental, social and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable, including women.
9.7a Local Communities (rights and interests)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and in the use of natural resources. For more information refer to: <a href="https://www.novelis.com/about-us/community-outreach/">https://www.novelis.com/about-us/community-outreach/</a>
9.7b Local Communities (impacts)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and in the use of natural resources. For more information refer to: <a href="https://www.novelis.com/about-us/community-outreach/">https://www.novelis.com/about-us/community-outreach/</a>
9.7c Local Communities (livelihoods)	Conformance	The Entity has implemented the Land Acquisition, Resettlement and Livelihood Restoration Policy, to respect the legal and customary rights and interests of Local Communities in their lands and livelihoods and in the use of natural resources. For more information refer to: <a href="https://www.novelis.com/about-us/community-outreach/">https://www.novelis.com/about-us/community-outreach/</a>
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented the Novelis Supplier Code of Conduct and does not contribute to armed conflicts or Human Rights abuses in Conflict-Affected and High-Risk Areas. During the process of qualifying new suppliers, the Conflict Minerals Questionnaire is signed. For more information refer to: <a href="https://www.novelis.com/?s=code+of+conduct">https://www.novelis.com/?s=code+of+conduct</a>
9.9 Security practice	Conformance	The Entity has a contracted and private security company, which respects the Human Rights of

CRITERION	RATING	COMMENT
		Workers in accordance with known security standards and good practices.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to freely associate in Labour Unions, seek representation and join Workers' Councils without interference and in compliance with the National Labor Relations Act of the USA. For more information refer to: <a href="https://www.nlr.gov/guidance/key-reference-materials/national-labor-relations-act">https://www.nlr.gov/guidance/key-reference-materials/national-labor-relations-act</a>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to freely associate in Labour Unions, seek representation and join Workers' Councils without interference and in compliance with the National Labor Relations Act of the USA. For more information refer to: <a href="https://www.nlr.gov/guidance/key-reference-materials/national-labor-relations-act">https://www.nlr.gov/guidance/key-reference-materials/national-labor-relations-act</a>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as local legislation does not restrict the right to Freedom of Association and Collective Bargaining, thus not requiring alternative means of Association for Workers.
10.2a Child Labour (minimum age)	Conformance	The Entity has implemented and adhered to the UN Global Compact, which expresses the commitment to respect Human Rights, where Child Labour must not be used nor condoned. For more information refer to: <a href="https://www.novelis.com/wp-content/uploads/2022/10/Novelis-Code-of-Conduct-October-2022-ENG.pdf">https://www.novelis.com/wp-content/uploads/2022/10/Novelis-Code-of-Conduct-October-2022-ENG.pdf</a>
10.2b Child Labour (hazardous)	Conformance	The Entity has implemented and adhered to the UN Global Compact, which expresses the commitment to respect human rights, where Child Labour must not be used nor condoned. For more information refer to: <a href="https://www.novelis.com/wp-content/uploads/2022/10/Novelis-Code-of-Conduct-October-2022-ENG.pdf">https://www.novelis.com/wp-content/uploads/2022/10/Novelis-Code-of-Conduct-October-2022-ENG.pdf</a>
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented and adhered to the UN Global Compact, which expresses the commitment to respect human rights, where Child Labour must not be used nor condoned. For more information refer to: <a href="https://www.novelis.com/wp-content/uploads/2022/10/Novelis-Code-of-Conduct-October-2022-ENG.pdf">https://www.novelis.com/wp-content/uploads/2022/10/Novelis-Code-of-Conduct-October-2022-ENG.pdf</a>
10.3a Forced Labour (human trafficking)	Conformance	The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect



CRITERION	RATING	COMMENT
		Human Rights. The Entity does not engage in or support trafficking in persons directly or through any employment or recruitment agency. During the interviews with the workers, this information was confirmed.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity implements and adheres to the UN Global Compact, which expresses the commitment to respect Human Rights. The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers, directly or through employment or recruitment agencies. During the interviews with the workers, this information was confirmed.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to make deposits or deposit payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity is not involved in Forced Labour and does not provide loans or hold Workers in debt bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace or in housing on the Entity's premises.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not keep original copies of Workers' identity documents, work permits, travel documents or training certificates. During the interviews with the workers, this information was confirmed.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny Workers the freedom to terminate their employment contract at any time, without penalty, upon reasonable notice. During the interviews with the workers, this information was confirmed.
10.4 Non-Discrimination	Conformance	The Entity has established Equal Employment Opportunity and Discrimination, Harassment Free Workplace Policies, including a Recruitment Policy to ensure equal opportunities and does not support Discrimination. The Code of Conduct and Supplier Code of Conduct outline requirements that prohibit Discrimination in the workplace. All employees are required to complete annual training on Discrimination prevention.
10.5 Communication and engagement	Conformance	The Entity has developed the Equal Employment Opportunity and Discrimination and Harassment Free Workplace Policies to ensure open communication and



CRITERION	RATING	COMMENT
		<p>direct engagement with Workers and their representatives regarding working conditions and resolution of work and compensation issues, without threat of reprisal, intimidation or harassment. During the interviews with the workers, this information was confirmed.</p> <p>For more information refer to:  <a href="https://www.novelis.com/sustainability/">https://www.novelis.com/sustainability/</a></p>
10.6 Disciplinary practices	Conformance	<p>The Entity has developed a Workplace Violence Prevention Program Standard to ensure that it does not engage in nor tolerate the use of corporal punishment, mental or physical coercion, Harassment and gender-based Violence, including sexual harassment or verbal abuse of Workers.</p> <p>The collective agreements in place also define in detail these disciplinary practices, if required.</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity has developed the Employee Compensation Standard to ensure Workers' rights to a minimum wage and that wages are paid monthly, and annually updated through the Hourly Wage Increase History Table, which must be sufficient to meet Workers' basic needs.</p>
10.7b Remuneration (method of payment)	Conformance	<p>All payments made to Workers are documented and paid in a timely manner (i.e. monthly).</p>
10.8 Working Time	Conformance	<p>The Entity has developed the Employee Compensation Standard to ensure Workers' rights to a working day that complies with local legislation, including overtime, holidays and paid annual vacation time.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity's Management System is certified to the ISO 45001 Standard, with the elaboration of an Integrated System Policy, approved by the senior management and made available in the internal system and publicly disclosed on the Entity's website:  <a href="https://www.novelis.com/cerifications">https://www.novelis.com/cerifications</a></p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity's Management System is certified to ISO 45001. All Workers are trained during the process of integration to work.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>The Entity's Management System is certified to ISO 45001, with the elaboration of an Integrated System Policy according to international standards and ILO Conventions on Occupational Health and Safety.</p>

CRITERION	RATING	COMMENT
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed several safety tools, including a 'Duty of Refusal' tool, in which employees have the duty to understand the dangers and safe practices of their work and the authority to refuse or interrupt unsafe work. For more information refer to: <a href="https://www.novelis.com/suppliers/safety-absolute">https://www.novelis.com/suppliers/safety-absolute</a>
11.2 OH&S Management System	Conformance	The Entity has documented an ISO 45001 certified Occupational Health and Safety (OH&S) Management System. A Novelis Health Safety Environment (HSE) Policy is documented, and the Entity has developed and implemented a Health and Safety Manual that defines management processes and procedures, including hazard identification, roles and responsibilities, training, assessment, contractor management, inspections and audits and performance indicators. The HSE Policy is available at: <a href="https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf">https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</a> Further information is also available at: <a href="https://www.novelis.com/suppliers/safety-absolutes">https://www.novelis.com/suppliers/safety-absolutes</a>
11.3 Employee engagement on health and safety	Conformance	The Entity's Workers participate in improving its culture of safety and awareness through their involvement in various on-site committees and communications mechanisms.
11.4 OH&S performance	Conformance	The Entity assesses its OH&S performance through indicators monitored by the Novelis Power BI dashboard. Performance indicators include leading and lagging indicators including risk reduction, action closure, Lost Time Injuries (LTI) and Total Recordable Injury Rate (TRIR). OH&S indicators are aggregated and published annually in the Novelis Sustainability Report available at: <a href="https://www.novelis.com/sustainability/sustainability-report/">https://www.novelis.com/sustainability/sustainability-report/</a>

#### **Document Control and Version History**

Revision	Date	Notes
0	25 October 2023	Initial Certification Audit - Full Certification.
1	23 January 2025	Surveillance Audit. Correction to the Entity's Supply Chain Activities to replace 'Material Conversion (Production and Transformation)' with 'Semi-Fabrication'.