

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis (China) Aluminum Products Co., Ltd

CERTIFICATE NUMBER
199

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE
22 APRIL 2025

DATE OF EXPIRY
21 APRIL 2028

CERTIFIED SINCE
22 APRIL 2022

AUTHORISED BY

A stylized, handwritten signature in black ink, appearing to be 'J. Hall'.

Aluminium Stewardship Initiative Ltd
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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

The manufacture of Aluminium automotive sheet for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Line, Laser Cutting Line and Annealing Furnace at Changzhou production facility in China.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis (China) Aluminum Products Co., Ltd
CERTIFICATION SCOPE	The manufacture of Aluminium automotive sheet for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Line, Laser Cutting Line and Annealing Furnace at Changzhou production facility in China.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-FabricationMaterial Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (24 – 25 February 2022)Surveillance Audit (17 July 2023)Re-Certification Audit and Scope Change (6 – 7 January 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">24 – 25 February 2022 (Initial Certification Audit)17 July 2023 (Surveillance Audit)6 – 7 January 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">30 March 2022 (Initial Certification Audit)7 August 2023 (Surveillance Audit)18 March 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (24 – 25 February 2022)</u></p> <p>The Audit Scope includes manufacture of Aluminium automotive sheet for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Line, Laser Cutting Line and Annealing Furnace at Changzhou production facility in China.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-FabricationMaterial Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (17 July 2023)</u></p> <p>The Audit Scope includes manufacture of Aluminium automotive sheet for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Line, Laser Cutting Line and Annealing Furnace at Changzhou production facility in China.</p>

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion (Production and Transformation)

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

Re-Certification Audit and Scope Change (6-7 January 2025)

The Audit Scope includes manufacture of Aluminium automotive sheet for lightweight vehicle structures and body panels including Continuous Annealing Solution Heat (CASH) Lines, Slitting Line, Laser Cutting Line and Annealing Furnace at Changzhou production facility in China.

Supply chain activities included in the Audit Scope:

- Semi-Fabrication
- Material Conversion

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 April 2025 – 21 April 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

21 April 2027

CERTIFICATE NUMBER

199



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 (China) Aluminum Products Co., Ltd (the 'Entity'), located at No. 19, Xingtang Road, Xin Bei District, Changzhou, Jiangsu, China, specialises in the manufacturing of Aluminium automotive sheet for lightweight vehicle structures and body panels. The Entity operates a consolidated production plant featuring major production lines such as Continuous Annealing Solution Heat (CASH) lines, a slitting line, a laser cutting Line and an annealing Furnace, with an annual production capacity of 200,000 tonnes. Ancillary facilities include an employee parking lot and a warehouse. The Entity supplies Aluminium coils and sheet blanks primarily to domestic and Asian automotive OEMs, with additional shipments to Europe.

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes to ensure compliance with legal requirements. The Legal Compliance Department oversees the implementation of Applicable Law, regulations and other obligations, conducting annual compliance reviews. All relevant legal and customer requirements have been identified, and no significant compliance issues have been reported. Compliance performance is disclosed in the Entity's parent company's annual Sustainability Report, available at:</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>and Novelis 2024 Form 10-K, page 120, at:</p> <p>https://investors.novelis.com/sec-filings/all-sec-filings/content/0001304280-24-000024/nvl-20240331.htm#ie29d0475f52046eab13011b74aa69d9e_205</p>
1.2 Anti-Corruption	Conformance	<p>Policies and procedures including the Anti-Corruption Management Procedure, are in place to identify and prevent Corruption, with personnel trained accordingly, as confirmed by training records. The Entity opposes all forms of Corruption, including Extortion and Bribery, in compliance with Applicable Law and international standards. The Entity's Code of Conduct is available at:</p> <p>https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity's parent company has established and implemented a Code of Conduct that addresses Environmental, Social, and Governance (ESG) principles. The Entity has implemented measures, including training and communication, to ensure employees, business partners and suppliers are aware of the Code. A formal review of the Code of Conduct is conducted annually, with additional reviews if there are significant changes in ESG risks, or indications of control gaps. The Entity's Code of Conduct is publicly available on its parent company's website at:</p> <p>https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has developed and implemented comprehensive Environmental, Social and Governance (ESG) Policies, including environmental, Human Rights, Health and Safety, and Responsible Procurement Policies. These Policies are integrated into the Entity's Code of Conduct and Environmental, Health, and Safety Policy, which have been communicated to employees internally and Stakeholders externally at: https://www.novelis.com/sustainability/</p> <p>The Entity commits to reviewing these Policies annually and/or whenever significant changes occur in the Business that may affect ESG risks or indicate potential control deficiencies.</p>
2.2a-c Leadership	Conformance	<p>The Entity's Plant Manager serves as the ASI Management Representative, responsible for establishing and implementing ASI standards within the Entity. The Representative also ensures</p>

CRITERION	RATING	COMMENT
		communication of ASI Policies throughout the Entity. A cross-departmental ASI working group has been formed to oversee the implementation of these Standards, with ASI Policies and management procedures communicated to all employees through various training courses.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has established and documented an Environmental Management System and holds a valid ISO 14001:2015 certification.
2.3b Environmental and Social Management Systems – Social	Conformance	A Social Management System has been established and implemented. Social impacts and relevant risks, including those related to Human Rights, Occupational Health and Safety (OH&S), and business ethics, have been identified and assessed. Management measures to prevent and mitigate these impacts are in place.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has established Policies, systems, procedures and processes that conform to the responsible sourcing requirements. It conducts second-party Due Diligence Audits at major next-tier suppliers' sites to qualify them. The procurement team and relevant personnel receive annual training on responsible sourcing. The purchasing Policies and supplier Code of Conduct can be accessed at:</p> <p>https://www.novelis.com/wp-content/uploads/2024/08/Novelis-Supplier-Code-of-Conduct-08232024.pdf</p> <p>The Entity's ASI management procedure requires periodic reviews of purchasing Policies during management meetings, and/or whenever there are significant changes in environmental, social, or governance risks, or signs of control deficiencies.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable, as the Entity has not initiated any New Projects or made Major Changes to existing facilities.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable, as the Entity has not initiated any New Projects or made Major Changes to existing facilities.
2.7a-f Emergency Response Plan	Conformance	The Entity holds valid ISO 14001:2015 and ISO 45001:2018 certifications. Emergency Response Plans are developed, implemented and tested through annual drills to assess their effectiveness. Employees receive emergency response training, and the Entity commits to reassessing these plans if organisational changes affect the scale or nature of emergency risks. The plans will also be reviewed if control deficiencies are identified. The Chinese versions of the Environmental Emergency Action Plan and Production Safety Emergency Action Plan are available at: https://www.novelis.com/sustainability/
2.8a-d Suspended Operations	Conformance	The Entity has developed a Business Continuity Management Programme to address situations where operations may need to be suspended or significantly altered due to factors beyond its control. It is committed to complying with applicable laws, company Policies on layoffs, and consulting employee organisations as required. The suspension and management procedures will be reviewed in response to any Material Environmental, Social, or Governance (ESG) risks arising from Business changes or identified control gaps and is

CRITERION	RATING	COMMENT
		also be reviewed annually. No suspension activities have occurred in the past five years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity is a manufacturing plant within the Novelis Group. The Mergers and Acquisitions (M&A) function is managed at the Group's headquarters, where M&A procedures aligned with the ASI Performance Standard are established. Senior management is committed to conducting Due Diligence for any future M&A activities and to reviewing related ESG practices, including those associated with historic Aluminium operations.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has established a management procedure for Closure, Decommissioning, and Divestment at the Novelis headquarters level in compliance with the ASI Performance Standard. Senior management is committed to reviewing ESG practices related to this standard during the planning of any future Closure, Decommissioning, or Divestment activities and to developing a plan for monitoring Material ESG impacts. However, no such activities have occurred since the Entity began operations in 2012.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity's annual Sustainability Report highlights key performance metrics, covering governance on environmental, social, and economic impacts, circular economy initiatives, product carbon footprint, Human Rights, and responsible supply chain practices. The Report has been prepared in accordance with the GRI Standards and has been third-party verified. The Report is available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
3.2 Non-compliance and Liabilities	Conformance	There have been no Material fines, judgments, penalties, or non-monetary sanctions for non-compliance with Applicable Law and regulations at the Entity since 2012. For further details on non-compliance and liabilities, please refer to: https://www.novelis.com/sustainability and the Entity's 2023 Pollutant Emission Report at: https://www.novelis.com/wp-content/uploads/2024/12/16.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%892023%E5%B9%B4%E6%B0%B4%E6%B1%A1%E6%9F%93%E7%89%A9%E3%80%81%E5%A4%A7%E6%B0%94%E6%B1%A1%E6%9F%93%E7%89%A9%E5%92%8C%E5%9B%BA%E5%BA%9F%E6%8E%92%E6%94%BE%E6%95%B0%E6%8D%AE.pdf
3.3a-c Payments to Governments	Conformance	The Entity makes or has made payments to governments solely on a legal or contractual basis. Its financial Audit Reports are verified by an independent accounting firm, and results are disclosed at: https://investors.novelis.com/financial-information/financial-results
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity's Complaints and Grievance Mechanism have been established and implemented. The Complaint Resolution process is outlined in the management procedure and available at: https://www.novelis.com/wp-content/uploads/2024/12/07.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E6%A3%80%E4%B8%BE%E6%94%BF%E7%AD%96.pdf To date, no significant complaints have been received. Complaints, grievances, and Stakeholder concerns, and the resolution approaches

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		required, are reviewed annually during the ASI management review meetings. The Entity commits to reviewing the Complaint Resolution process following any changes to the Business that impact Material ESG risks, or if any control gaps are identified.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	An environmental Life Cycle Assessment (LCA) report based on ISO 14040 and ISO 14044 has been prepared by a third party, which incorporates all Products and production lines. There have been no changes to the Products, production lines or supply chain in the past three years.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity's LCA report provides 'cradle-to-gate' data for its Aluminium Products, that incorporates all Product processes and production lines. The LCA report is available at: https://www.novelis.com/wp-content/uploads/2025/02/19.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E6%B1%BD%E8%BD%A6%E4%B8%93%E7%94%A8%E9%93%9D%E6%9D%BF%E7%94%9F%E5%91%BD%E5%91%A8%E6%9C%9F%E8%AF%84%E4%BB%B7%E6%8A%A5%E5%91%8A.pdf
4.2 Product Design	Conformance	The Entity has incorporated sustainability objectives into the design and development process, addressing the environmental life cycle impacts of the end Products. The sampled project files demonstrate that management plans have been established and are being implemented.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has minimised Aluminium Process Scrap generation in its operations and aims to recycle 100% of any Scrap produced. The Scrap is collected, packaged, and sold to other companies for recycling, with Aluminium alloys separated by grade.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity's enterprise group has set a sustainability target to increase the average recycled content from 63% to 75% by 2030. The strategy, including specific timelines, activities, and targets, is publicly disclosed in the Entity's 2024 Sustainability Report at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf Progress toward this target is reviewed annually, and the strategy is reassessed every five years, with new targets established as required.
4.4d Collection and Recycling of Products at End of Life	Conformance	Due to the lack of comprehensive local, regional, or national Aluminium Scrap collection and recycling systems in China, as well as the absence of a Casthouse within the Entity, the Entity is collaborating with Novelis Asia, carmakers, and extrusion companies to explore opportunities for collecting and recycling end-of-life Scrap.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	The Entity has calculated its Material Greenhouse Gas (GHG) emissions within the defined boundary for 2022, including Scope 1, Scope 2, and relevant Scope 3 emissions including those from purchased raw materials and transportation. The 2023 GHG Emission Report was verified by a third party. The Report and the Verification

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		<p>Statement are available at: https://www.novelis.com/wp-content/uploads/2025/02/21-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E7%A2%B3%E6%A0%B8%E6%9F%A5%E6%8A%A5%E5%91%8A.pdf and https://www.novelis.com/wp-content/uploads/2025/01/20-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E6%A0%B8%E6%9F%A5%E5%A3%B0%E6%98%8E%EF%BC%88ISO14064%E8%AF%81%E4%B9%A6%EF%BC%89.pdf</p> <p>However, the material emission source, specifically the indirect GHG emissions from Products used by the Entity, is marked as 'Not Applicable' without any explanation provided.</p>
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 GHG Emissions Reduction Plans	Conformance	<p>The Entity's Enterprise Group has established a global carbon footprint strategy for 2050, aiming to reduce its carbon footprint by 30% by 2026 and achieve carbon neutrality by 2050. To comply with this strategy and the ASI Entity GHG Pathways Calculation Tool, the Entity has set GHG emission reduction targets and related management programmes, available at: https://www.novelis.com/wp-content/uploads/2025/01/%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E5%87%8F%E6%8E%92%E6%96%B9%E6%A1%88.pdf and https://www.novelis.com/wp-content/uploads/2025/01/23-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E5%87%8F%E6%8E%92%E6%96%B9%E6%A1%88-2.pdf</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity's Enterprise Group has established a global carbon footprint strategy for 2050, aiming to reduce its carbon footprint by 30% by 2026 and achieve carbon neutrality by 2050. To comply with this strategy and the ASI Entity GHG Pathways Calculation Tool, the Entity has set GHG emission reduction targets and GHG emissions reduction pathway including a baseline year and Intermediate Targets, available at: https://www.novelis.com/wp-content/uploads/2025/01/%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E5%87%8F%E6%8E%92%E6%96%B9%E6%A1%88.pdf and https://www.novelis.com/wp-content/uploads/2025/01/23-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E5%87%8F%E6%8E%92%E6%96%B9%E6%A1%88-2.pdf</p>

CRITERION	RATING	COMMENT
		96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E6%B8%A9%E5%AE%A4%E6%B0%94%E4%BD%93%E5%87%8F%E6%8E%92%E6%96%B9%E6%A1%88-2.pdf
5.4 GHG Emissions Management	Conformance	To achieve its GHG emission reduction targets, the Entity has established a procedure for regular data collection, validation, and reporting of GHG emissions, as well as the associated accounting and reporting methods. The Entity has implemented an energy Management System to improve energy efficiency, reduce GHG emissions, and has obtained ISO 50001:2018 certification.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>In compliance with the Environmental Management System and legal requirements, the Entity identifies, assesses, and quantifies Material air emissions from its activities. It implements control plans to minimise exposure to and impacts from these emissions, monitors their effectiveness periodically, and reviews the plans regularly or when major changes or Non-Conformance occur. The 2023 air emission data and reduction plan are publicly disclosed at:</p> <p>https://www.novelis.com/wp-content/uploads/2024/12/16.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%2023%E5%B9%B4%E6%B0%B4%E6%B1%A1%E6%9F%93%E7%89%A9%E3%80%81%E5%A4%A7%E6%B0%94%E6%B1%A1%E6%9F%93%E7%89%A9%E5%92%8C%E5%9B%BA%E5%BA%9F%E6%8E%92%E6%94%BE%E6%95%B0%E6%8D%AE.pdf</p> <p>and</p> <p>https://www.novelis.com/wp-content/uploads/2024/12/17.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E5%A4%A7%E6%B0%94%E3%80%81%E6%B0%B4%E6%B1%A1%E6%9F%93%E7%89%A9%E5%92%8C%E5%9B%BA%E5%BA%9F%E5%87%8F%E6%8E%92%E9%A1%B9%E7%9B%AE%E6%8A%AB%E9%9C%B2.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>Discharges to water are tracked and managed through the Environmental Management System, in compliance with ISO 14001. The Entity collects, treats, and recycles wastewater, which is discharged into the external drainage system. Wastewater is monitored to ensure major pollutants comply with local legal discharge limits. The control plan is periodically reviewed and updated as necessary. Wastewater discharge data and the reduction plan are publicly available at:</p> <p>https://www.novelis.com/wp-content/uploads/2024/12/16.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%2023%E5%B9%B4%E6%B0%B4%E6%B1%A1%E6%9F%93%E7%89%A9%E3%80%81%E5%A4%A7%E6%B0%94%E6%B1%A1%E6%9F%93%E7%89%A9%E5%92%8C%E5%9B%BA%E5%BA%9F%E5%87%8F%E6%8E%92%E9%A1%B9%E7%9B%AE%E6%8A%AB%E9%9C%B2.pdf</p> <p>and</p> <p>https://www.novelis.com/wp-content/uploads/2024/12/17.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E5%A4%A7%E6%B0%94%E3%80%81%E6%B0%B4%E6%B1%A1%E6%9F%93%E7%89%A9%E5%92%8C%E5%9B%BA%E5%BA%9F%E5%87%8F%E6%8E%92%E9%A1%B9%E7%9B%AE%E6%8A%AB%E9%9C%B2.pdf</p>

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has conducted an assessment to identify areas where Spills and Leakages could contaminate air, water, and soil, which has been undertaken in accordance with the risk assessment process of the Environmental Management System. Corresponding management measures have been defined and implemented. The risk assessment and management plan are periodically reviewed and updated as needed. The latest version is publicly available at:</p> <p>https://www.novelis.com/wp-content/uploads/2024/12/12-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E6%B3%84%E6%BC%8F%E8%AF%84%E4%BC%B0%E5%92%8C%E7%AE%A1%E7%90%86%E6%8A%A5%E5%91%8A.pdf</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity requires the disclosure of the amount, nature, and potential impact of significant Spills to all relevant parties. The annual public report will include the impact assessment and corrective measures. No Spills have occurred in the past three years.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>Waste management is managed through the Environmental Management System. The Environmental Impact Assessment identifies the quantity of Hazardous and Non-Hazardous Waste generated by the Entity's operations, along with the potential impacts on human health and the environment. A Waste management strategy is implemented in accordance with the Waste Mitigation Hierarchy. Hazardous Waste disposal complies with legal requirements. The quantities of Hazardous and Non-Hazardous Waste generated in 2023 are available at:</p> <p>https://www.novelis.com/wp-content/uploads/2024/12/16-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%892023%E5%B9%B4%E6%B0%B4%E6%B1%A1%E6%9F%93%E7%89%A9%E3%80%81%E5%A4%A7%E6%B0%94%E6%B1%A1%E6%9F%93%E7%89%A9%E5%92%8C%E5%9B%BA%E5%BA%9F%E6%8E%92%E6%94%BE%E6%95%B0%E6%8D%AE.pdf</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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity sources water from the municipal supply, and usage is tracked and documented. The required Permit for Water Discharge into the municipal drainage system has been obtained from the relevant government agency. Wastewater is treated, reused, and not discharged into external water systems.</p> <p>The Entity has conducted a water risk assessment based on the approved Environmental Impact Assessment (EIA) and pollutant discharge permit, which include an evaluation of water withdrawal and discharge. Both internal and external risks in the Entity's Area of Influence were considered, and due to the nature of the Product, production processes, and external environment, the water-related risk is assessed as low. The water risk assessment report and water balance map are publicly available at:</p>

CRITERION	RATING	COMMENT
		https://www.novelis.com/wp-content/uploads/2024/12/11.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E6%B0%B4%E8%B5%84%E6%BA%90%E9%A3%8E%E9%99%A9%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A%E5%8F%8A%E6%B0%B4%E5%B9%B3%E8%A1%A1%E5%9B%BE.pdf
7.2a-e Water Management	Not Applicable	This Criterion is not applicable as no significant water-related risks have been identified within the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity's Environmental Management System addresses Biodiversity assessment. The Entity has evaluated the risks and impacts of its operations, assessing the risk in its Area of Influence as low. The Biodiversity and Ecosystem Services Risk and Impact Assessment Report is available at: https://www.novelis.com/wp-content/uploads/2024/12/13.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E7%94%9F%E7%89%A9%E5%A4%9A%E6%A0%B7%E6%80%A7%E5%92%8C%E7%94%9F%E6%80%81%E7%B3%BB%E7%BB%9F%E6%9C%8D%E5%8A%A1%E9%A3%8E%E9%99%A9%E8%AF%84%E4%BC%B0%E6%8A%A5%E5%91%8A.pdf
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as the Entity's Biodiversity Assessment Report identified the risk and potential impacts on Biodiversity and Ecosystem Services as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable as no Priority Ecosystem Services have been identified.
8.4 Alien Species	Conformance	The Entity's main carrier medium is wooden pallets, which have been chemically treated to prevent the introduction of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity commits to a "No Go" Policy regarding World Heritage Properties. There are no World Heritage Properties located within the Entity's Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity has identified that no Protected Areas are located within its 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		

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has established Human Rights and Forced Labour Policies to uphold Human Rights, promote gender equality, and comply with the United Nations (UN) Guiding Principles on Business and Human Rights. These policies are publicly available at: https://zh-hans.novelis.com/wp-content/uploads/2024/12/04.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E4%BA%BA%E6%9D%83%E5%92%8C%E5%BC%BA%E8%BF%AB%E5%8A%B3%E5%8A%A8%E6%94%BF%E7%AD%96.pdf</p> <p>The Entity regularly publishes the Environmental & Social Impact Assessment Report, which outlines its engagement with affected communities and Grievance Resolution Mechanisms. The latest report, management review meetings, and Stakeholder Grievance records confirm that the Entity's operations have not caused any significant adverse Human Rights impacts. If any such impacts are identified or reported, the Entity is committed to providing remedies or cooperating through legitimate processes.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has established and implemented a management procedure to protect female employees, demonstrating its commitment to gender equity and women's empowerment across. Public disclosures about its gender equity Policy and performance in safeguarding female Workers' rights are available in the Entity's Environmental and Social Impact Assessment Summary Report, Human Rights Evaluation section, at https://zh-hans.novelis.com/wp-content/uploads/2024/12/08.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E7%8E%AF%E5%A2%83%E5%92%8C%E7%A4%BE%E4%BC%9A%E5%BD%B1%E5%93%8D%E8%AF%84%E4%BB%B7.pdf</p> <p>Additionally, the effectiveness of Novelis Group's gender equality initiatives is detailed in the Gender Equality and Diversity section of the Group's annual Sustainability Report at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>No gender equity-related Complaints have been received in the past three years. The Entity is committed to regularly reviewing and updating its Equality and Diversity Policies in response to any significant changes or identified control deficiencies.</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable 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 as there are no Indigenous Peoples within the Entity's Area of Influence.
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.

CRITERION	RATING	COMMENT
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has implemented a process to identify and assess Cultural and Sacred Heritage sites, aiming to minimise potential impacts. All current projects have undergone Environmental Impact Assessments (EIA) and social assessments, confirming that no Sacred or Cultural Heritage sites are located 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 Cultural or Sacred Heritage sites within its Area of Influence, nor are there any Indigenous Peoples or their lands, territories, and resources identified.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity as it has no history of projects causing Resettlements.
9.7a-h Affected Populations and Organisations	Conformance	The Entity has implemented a Stakeholder engagement process to identify and address the key concerns of the Affected Population and Organisations. To effectively respond, the Entity has developed plans, which are reviewed annually for necessary improvements. The Entity discloses its progress on the Environmental Emergency Response Plan, Annual Pollutant Emissions Report, and Pollutant Reduction Plan at: https://www.novelis.com/sustainability/
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has established and implemented Management Systems that include a Conflict Minerals Sourcing Policy, defined responsibilities, allocated resources, information-gathering mechanisms, and active supplier engagement. Committed to responsible sourcing, the Entity currently sources all primary raw materials from ASI Performance Standard certified suppliers. The Conflict Minerals Sourcing Policy is publicly available at: https://www.novelis.com/wp-content/uploads/2024/12/06-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E5%8F%97%E5%86%B2%E7%AA%81%E7%9F%BF%E4%BA%A7%E6%89%BF%E8%AF%BA.pdf
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity regularly conducts risk assessments to identify and evaluate potential risks in its supply chain. It does not use conflict minerals and ensures no materials are sourced from Conflict-Affected and High-Risk Areas (CAHRAs). Additionally, the Entity is committed to addressing Human Rights concerns, including Child Labour and Forced Labour, ensuring these issues are absent from its supply chain.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The risk assessment records confirm that the Entity does not use conflict minerals, source materials from CAHRAs, or engage in critical Human Rights violations, such as Child Labour or Forced Labour, in its supply chain. No further action is required.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity has developed and implemented a supply chain Code of Conduct, which includes social responsibility provisions. To uphold its commitment to Responsible Sourcing, the Entity regularly audits its supply chain to ensure compliance and identify any use of conflict minerals. Risk assessments and supplier Audit Reports confirm no critical issues and no evidence of conflict minerals in the supply chain. The risk associated with conflict minerals is deemed low. The Entity also maintains an ongoing improvement plan to strengthen its practices and ensure continued adherence to Responsible Sourcing principles.

CRITERION	RATING	COMMENT
		This ASI Performance Standard Audit also addresses the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity has implemented its Conflict Minerals Sourcing Policy across its supply chain, conducting risk assessments and social responsibility Audits to ensure compliance. It is committed to preventing the use of conflict materials and sourcing from CAHRAs. Its annual Supplier Due-Diligence Report is available at:</p> <p>https://www.novelis.com/wp-content/uploads/2024/12/10.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E4%BE%9B%E5%BA%94%E5%95%86%E5%B0%BD%E8%81%8C%E8%B0%83%E6%9F%A5%E6%8A%A5%E5%91%8A.pdf</p>
9.9 Security practice	Conformance	The Entity's security services are outsourced, and the contractor adheres to the Entity's Supplier Code of Conduct. Body searches and restrictions on free movement are prohibited. No Grievances or Complaints have been received to date.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining is addressed in accordance with Chinese Applicable Law.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity's senior management committees to respecting the rights to Freedom of Association and Collective Bargaining. All employees have joined the Labour Union, and regular meetings between Union representatives and management are held to discuss and negotiate employee rights and benefits. The Collective Bargaining agreement and special protection contract for female Workers have been signed and approved by senior management. The Labour Union chairman, committee members, and employee representatives are all freely elected by the workforce. Workers' representatives are available to engage with management on behalf of employees regarding any concerns.
10.2a-c Child Labour	Conformance	Child Labour is prohibited in China, with a legal minimum working age of 16. The Entity has established Policies that explicitly forbids the use of Child Labor and to protect young Workers. No underage Workers are employed by the Entity.
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity has established a Policy prohibiting Forced Labour, including Human Trafficking. This Policy applies to both the Entity and its suppliers, emphasising compliance with the prohibition of Forced Labour, Modern Slavery, and Human Trafficking. No instances of illegal wage deductions, debt bondage, or other forms of Forced Labor have been reported. The Entity's Code of Conduct and its annual Social Assessment Report are available at:</p> <p>https://www.novelis.com/wp-content/uploads/2024/12/03.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E8%A1%8C%E4%B8%BA%E5%87%86%E5%88%99.pdf and</p> <p>https://www.novelis.com/wp-content/uploads/2024/12/08.-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%EF%BC%88%E4%B8%AD%E5%9B%BD%EF%BC%89%E7%8E%AF%E5%</p>

CRITERION	RATING	COMMENT
		<p>A2%83%E5%92%8C%E7%A4%BE%E4%BC%9A%E5%BD%B1%E5%93%8D%E8%AF%84%E4%BB%B7.pdf</p> <p>However, the Entity lacks specific actions addressing Modern Slavery.</p>
10.4a-c Non-Discrimination	Conformance	The Entity is committed to non-Discrimination, and no Discrimination cases have been reported. Recruitment advertisements and the training plan emphasise that employment decisions are based solely on candidates' qualifications. Employees interviewed confirm that they feel treated equally within the Entity.
10.5 Communication and engagement	Conformance	Communication channels have been established between management, Workers, and their representatives. These channels are communicated to the workforce, allowing employees to raise concerns and Grievances about working conditions, workplace issues, and compensation, without fear of retaliation, intimidation, or Harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has implemented Policies prohibiting Harassment and bullying. To ensure awareness, an informative brochure has been distributed to all employees. The Code of Conduct addresses this issue, and regular training sessions are held to reinforce these principles. The Code of Conduct is available at: https://www.novelis.com/wp-content/uploads/2024/12/03--%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E8%A1%8C%E4%B8%BA%E5%87%86%E5%88%99.pdf
10.7a-c Remuneration	Conformance	The wage structure is defined, with the base salary exceeding the local legal minimum. Overtime payments comply with legal requirements, and mandatory allowances are provided to meet essential needs. All employees are enrolled in the mandatory social insurance program. Wages are paid via bank transfer on the 15 th of the following month, with detailed records maintained. Information on wages, allowances, Overtime, and deductions is accessible through the internal system.
10.8a-c Working Time	Conformance	All working hours are tracked. The standard working week is 40 hours, spread across five days. The workshop is divided into four groups, each with three shifts, while office staff works a single shift. The Entity follows a unique shift system: employees work for six days, rest for two, then work for two more days and rest for one. Shifts rotate every two days, with each cycle lasting eleven days. This system ensures employees have at least one day off every seven days and an average of eight working hours or fewer per day over a six-month period.
10.9a-b Informing Workers of Rights	Conformance	The Entity has informed its workforce their rights and fostered communication through orientation training, an Employee Handbook, and on-site billboards. The Entity is committed to complying with all applicable national laws and regulations in China.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has established, implemented, maintained, and continually improves its documented Occupational Health and Safety (OH&S) Management System, obtaining ISO 45001:2018 certification. The validity of the ISO 45001:2018 certificate can be verified through the

CRITERION	RATING	COMMENT
		Certification and Accreditation Administration of China at: www.cnca.org.cn
11.1b-e Occupational Health and Safety (OH&S) Management System – Reviews and disclosure	Conformance	The Entity regularly reviews the OH&S Management System through safety meetings, annual legal compliance evaluations, internal Audits against ISO 45001:2018, and management review meetings. If any control gaps are identified, the review assesses the need for corrective or preventive actions. OH&S performance, including leading and lagging indicators and comparative analyses with peer Businesses and leading practices, is publicly available at: https://www.novelis.com/wp-content/uploads/2024/12/09-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E7%BC%88%E4%B8%AD%E5%9B%BD%E7%BC%89%E5%81%A5%E5%BA%B7%E4%B8%8E%E5%AE%89%E5%85%A8%E7%AE%A1%E7%90%86%E4%BD%93%E7%B3%BB%E6%88%90%E6%95%88.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity has established mechanisms for Workers to raise, discuss, and participate in resolving OH&S issues with management. Workers are encouraged to report concerns or provide advice on OH&S matters to management or Worker representatives.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	22 April 2022	Initial Certification Audit – Full Certification
1	19 August 2023	Surveillance Audit
2	22 April 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply V3.1.