

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis North America – Berea, KY

CERTIFICATE NUMBER
212

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
DNV BUSINESS
ASSURANCE
SERVICES UK LTD.

DATE OF ISSUE
30 JUNE 2025

DATE OF EXPIRY
29 JUNE 2028

CERTIFIED SINCE
30 JUNE 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', with a long horizontal line extending to the right.

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

All activities on the Berea, Kentucky
(USA) manufacturing site to
produce Aluminium sheet ingot,
including shredding, decoating,
melting, and casting.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis
ENTITY NAME	Novelis North America – Berea, KY
CERTIFICATION SCOPE	All activities on the Berea, Kentucky (USA) manufacturing site to produce Aluminium sheet ingot, including shredding, decoating, melting, and casting.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (18 – 22 April 2022)Surveillance Audit (4 – 8 September 2023)Re-Certification Audit and Scope Change (14 May – 13 June 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">9 – 10 May 2022 (Initial Certification Audit)4 – 8 September 2023 (Surveillance Audit)14 May – 13 June 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">6 June 2022 (Initial Certification Audit)21 November 2024 (Surveillance Audit)17 June 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (18 – 22 April 2022)</u></p> <p>The Audit Scope covers the activities undertaken at Novelis in Berea, KY (USA).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (4 – 8 September 2023)</u></p> <p>The Audit Scope covers the activities undertaken at Novelis in Berea, KY (USA).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit and Scope Change (14 May – 13 June 2025)</u></p> <p>The Audit Scope covers the activities undertaken at Novelis in Berea, KY (USA).</p>

	<p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"> Aluminium Re-melting/Refining Casthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"> Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. <input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous. <input checked="" type="checkbox"/> 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. <input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	30 June 2025 – 29 June 2028
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	30 December 2026
CERTIFICATE NUMBER	212
	<p>If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: https://aluminium-stewardship.ethicspoint.com/</p> <p>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.</p> <p>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.</p>

ENTITY OVERVIEW

The Novelis Berea plant (the 'Entity') is one of the world's largest plants dedicated to Aluminium can recycling, with approximately 20 percent of all Used Beverage Cans (UBC) recycled in the United States sent to the Entity, it. The site melts down recycled cans to produce sheet ingot for use in the production of new Aluminium beverage cans. The Entity is located approximately one kilometre from the township of Berea, Kentucky USA and employs approximately 140 persons. There are no sensitive receptors situated adjacent to the facility as it is located within an industrial precinct, with the nearest residential areas located approximately 500 metres to the west of the facility, with the main residential areas of Berea approximately one kilometre south of the Entity.

The Entity provides direct donations to more than 20 local organisations and schools, including United Way, Sustainable Berea, Madison County Schools, Eastern Kentucky University, Berea College and Habitat for Humanity. The Entity also supports community growth by contributing to the city's Chamber of Commerce to help fund local festivals and bring business to the area.

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	High	High	Medium	HIGH
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a suitable system to monitor and comply with applicable legal requirements using procedures and worksheets to demonstrate compliance. This system also includes the use of external counsel services for local legal Compliance obligations as required. Further information is available at: https://www.novelis.com/our-expectations
1.2 Anti-Corruption	Conformance	<p>The Entity acts against Corruption in all its forms, including extortion and Bribery, in accordance with Applicable Law and current international standards. The Entity's requirements on anti-Bribery are disclosed in the Code of Conduct (pages 5 – 6), available at: https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p> <p>In the case of any suspicion relating to transactions or behaviours, both employees and public stakeholders can report allegations through the Ethic Line at: https://novelis.com/suppliers/ethics-line-vox-novelis/</p>
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct, including principles relevant to environmental, social and governance performance. Refer to: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented Policies consistent with environmental, social and governance practices. It has also implemented a document control system, which has been endorsed by senior management and is supported through the availability of resources and periodic review of the Policies.</p> <p>The Entity's Environment, Health, Safety and Quality Policy is consistent with environmental, social and governance practices and communicated internally on policy boards and is available at: https://www.novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p>
2.2a-c Leadership	Conformance	The Entity has appointed the Vice President (VP) of Operations Novelis North America as the Management Representative with overall responsibility and authority to ensure conformance with the requirements of the ASI Performance Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has been certified in accordance with ISO 14001. Refer to: https://novelis.com/wp-content/uploads/2025/06/Greensboro-CERT-0104578_ENG_Novelis-Aluminum-Corporation.pdf
2.3b Environmental and Social Management Systems – Social	Minor Non-Conformance	Novelis demonstrates that social aspects and issues are managed at both the Corporate and Entity levels. A Social Responsibility Policy is implemented at the Entity and is available at: https://www.novelis.com/wp-content/uploads/2025/02/Responsible-Sourcing-Policy.pdf

CRITERION	RATING	COMMENT
		A formalised, structured and documented social Management System however is still to be developed.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity implemented a Responsible Sourcing Policy and a Supplier Code of Conduct for suppliers covering environmental, social, and governance issues. The Responsible Sourcing Policy is available at: https://www.novelis.com/wp-content/uploads/2025/02/Responsible-Sourcing-Policy.pdf</p> <p>The Supplier Code of Conduct is available at: https://novelis.com/wp-content/uploads/2025/05/Novelis-Supplier-Code-of-Conduct-ENG-2025.pdf</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity as there have been no recent New Projects or Major Changes undertaken, nor are any such activities planning in the future.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity as there have been no recent New Projects or Major Changes undertaken, nor are any such activities planning in the future.
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented a site-specific Emergency Response Plan developed in collaboration with potentially affected Stakeholder groups including the Local Community, Workers and their representatives and relevant agencies. The Entity's 'First Responders' receive annual emergency training.</p> <p>Site-specific Emergency Response Plans are available at: https://novelis.com/sustainability/asi/</p>
2.8a-d Suspended Operations	Conformance	<p>Novelis has implemented a Business Resilience Plan (BRP) Standard across the Group. The Entity has developed and implemented a Contingency Plan and a Crisis Management Plan that would be used in any case of Suspended Operations.</p> <p>No suspension of operations has occurred at the Entity in recent years.</p>
2.9a-b Mergers and Acquisitions	Conformance	The Entity operates under a Novelis corporate framework to manage any potential merger, acquisition or displacement event. There are however, no merger, acquisition or relocation activities currently underway or planned at the Entity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity operates under a Novelis corporate framework to manage any potential closure or decommissioning event. There are however no closure or decommissioning activities currently underway or planned at the Entity location.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity publicly discloses its approach to governance, environmental, social and economic impacts through its annual Sustainability Report. The 2024 Sustainability Report is available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>Key sections of the 2024 Sustainability Report include: Environmental, Safety, Diversity and Inclusion (page 15), Employee Growth and</p>

CRITERION	RATING	COMMENT
		<p>Development (page 53), Local Community needs (page 57), Sustainability Governance (page 60).</p> <p>The Entity's 2024 Sustainability Report also provides information on Material environmental, social and economic impacts from its activities, including impacts related to environmental events, Air Emissions, Waste, Water and social factors.</p>
3.2 Non-compliance and Liabilities	Conformance	<p>No material fines, judgments, penalties or non-monetary sanctions were received by the Entity in 2023 or 2024.</p> <p>If applicable, the corporate reporting process as implemented by Novelis, requires the Entity to provide such information for public disclosure in the annual Sustainability Report.</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
3.3a-c Payments to Governments	Conformance	<p>Payments to governments made on behalf of the Entity include only operational taxes and fees. The Entity has a procedure, in accordance with the Anti-Corruption Policy and the Code of Conduct for analysing, approving and making payments to governments.</p> <p>The Code of Conduct is available at: https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity maintains channels for receiving and addressing internal and external concerns. Grievance Mechanisms related to working conditions are embedded within the Entity's Collective Bargaining Agreement (CBA).</p> <p>The Novelis Ethics Line is used to receive any information regarding potential or alleged Child Labour, Discrimination, Bribery, and Corruption incidents. The Ethics Line is confidential and is referred to in the Novelis Ethics Reporting Program Overview, available at: https://novelis.com/sustainability/asi/</p> <p>A Contact Us form is available on the Novelis website for any general information request from external interested parties. Refer to: https://www.novelis.com/contact/</p> <p>The Complaints Resolution Mechanism is available online at: https://novelis.com/sustainability/asi/</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>The Entity has evaluated the life cycle impacts of its Primary Aluminium-based product lines using the report 'Life Cycle Assessment (LCA) of North American Aluminum Cans', developed for The Aluminum Association, as it provides relevant data applicable to the Entity's Products:</p> <p>The LCA is publicly disclosed online at: https://www.aluminum.org/sites/default/files/2021-10/2021AluminumCanLCAReportFullVersion.pdf</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity has evaluated the life cycle impacts of its Primary Aluminium-based product lines using the report 'Life Cycle Assessment (LCA) of North American Aluminum Cans', developed for The Aluminum Association, as it provides relevant data applicable to the Entity's products:</p>

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		<p>The LCA is publicly disclosed online at: https://www.aluminum.org/sites/default/files/2021-10/2021AluminumCanLCAReportFullVersion.pdf</p> <p>'Cradle-to-gate' Life Cycle Assessment (LCA) information can be shared with customers upon request.</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as they are not involved in the Product development process, as all Product specification requirements are provided by the Entity's customers.
4.3a-b Aluminium Process Scrap	Conformance	The Entity minimises the generation of Aluminium Process Scrap in its own operations and recycles (remelts) all Scrap generated on site.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>The Entity is engaged with collection and recycling systems and supports and participates in regional projects to increase recycling, such as The Recycling Partnership's 'Circular Economy Accelerator' initiative. For further information, refer to: https://circulareconomyalliance.com/</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity accounts for and publicly discloses Material Greenhouse Gas (GHG) emissions and energy use by source annually on the Carbon Disclosure Project (CDP) Climate Change platform (https://www.cdp.net) and the USA Environmental Protection Agency's platform.</p> <p>GHG emissions data and additional GHG-related information is available in the 2024 Novelis Sustainability Report, pages 14-16 and 71, available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</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>A 1.5°C warming scenario emissions reduction objective is ensured by the Novelis Corporate plan, which aims to reduce its emissions by 30% by 2026 and aims for a 'carbon neutral' position by 2050.</p> <p>As part of the Novelis Group, the Entity publicly discloses 'up-to-date' Emissions Reduction Pathways, which are developed in accordance</p>

CRITERION	RATING	COMMENT
		with the ASI GHG Pathways Method. Refer to: https://novelis.com/wp-content/uploads/2025/02/ASI-Decarbonization-Pathway.pdf
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity publicly discloses progress against the GHG Emissions Reduction Plan annually through the Sustainability Report on page 16 at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>The associated decarbonisation strategy is also discussed in the Sustainability Report, on pages 19–40. The Entity's decarbonisation strategy has specified a baseline year and Intermediate Targets out to an end target year of 2050.</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented an Environmental Management System (EMS) which is certified under ISO 14001. The EMS includes monitoring and reporting of air emissions and actions for GHG reduction targets.</p> <p>Projects are in place and are embedded in relevant action plans within the EMS in order to improve processes and to contribute to the Corporate GHG Reduction Strategy.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>The Entity quantifies and publicly discloses Material Emissions to Air from its activities in its annual Sustainability Report, page 68: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>Air Emission monitoring is managed within the ISO 14001 Environmental Management System. The Entity has publicly disclosed the Emissions Effluents & Waste Plan that includes Air, Waste and Spill Management Plan on the Novelis website at: http://novelis.com/wp-content/uploads/2025/05/Novelis-North-America-Emissions-Effluents-and-Waste-r.0.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity quantifies and publicly discloses Water Discharge information from its activities in its annual Sustainability Report, page 70: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>Water discharge monitoring is managed within the ISO 14001 Environmental Management System.</p> <p>The Entity has publicly disclosed its Emissions Effluents & Waste Plan that includes the Air, Waste and Spill Management Plan at: https://novelis.com/wp-content/uploads/2025/05/Novelis-North-America-Emissions-Effluents-and-Waste-r.0.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity is certified under ISO 14001 and has undertaken an assessment of the main risk areas of operations where Spills and Leakages can contaminate the air, water and/or soil through its Environmental Management System.</p> <p>During the last three years, no significant Spill has occurred on site. The Entity has publicly disclosed the Emissions Effluents & Waste Plan that includes the Air, Waste and Spill Management Plan at: https://novelis.com/wp-content/uploads/2025/05/Novelis-North-America-Emissions-Effluents-and-Waste-r.0.pdf</p>

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6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The Entity has implemented a management plan that includes external communication functions, compliance controls and a monitoring program to prevent and detect Spills and Leakages through the Spill Prevention, Control and Response Performance Standard procedure.</p> <p>No significant Spill or Leakage events have occurred on site that have caused any type of impact and needed for external communication since at least three years.</p> <p>Any incidents regarding Spills and Leakage are publicly disclosed in the annual Sustainability Report, available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
6.5a-c Waste Management and Reporting	Minor Non-Conformance	<p>The Entity has implemented a Waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy through the Waste Management Programs and procedures</p> <p>The Entity quantifies and publicly discloses the quantity of Waste generated from its activities in its annual Sustainability Report, on page 69. Refer to: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>However, the Entity does not currently differentiate Waste volumes between Hazardous and Non-Hazardous Waste.</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	<p>The Entity maximises the recovery of Aluminium through the treatment of Dross by contracted companies. The Entity segregates Dross to improve Aluminium recovery and minimises the generation of Dross residues by contracted companies.</p> <p>The Entity has evaluated options as an alternative to landfill for slag residues in diverse third-party dross processing studies.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity has completed a water risk assessment using the Aqueduct Water Risk Atlas tool, which was developed by the World Resources Institute (WRI). Refer to: https://www.wri.org/data/data-applications</p> <p>The water risk assessment concluded that the Entity operates in an area of low risk for potential Affected Populations and Organisations. As such, no specific water management plan is in place for the Entity. The Entity however monitors water use and reports these results for inclusion into the Novelis Sustainability Report.</p> <p>A general action plan to manage water by the Novelis Group is available at (pages 17-18): http://novelis.com/wp-content/uploads/2025/05/Novelis-North-America-Emissions-Effluents-and-Waste-r.0.pdf</p>

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7.2a-e Water Management	Conformance	<p>The Entity has evaluated the risks related to water in the Watersheds within the Entity's Area of Influence via the Warren Watershed Assessment. Water-related risks have been determined as low.</p> <p>The Entity however regularly monitors water use and reports results for inclusion in Novelis' Group data in the Sustainability Report.</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has recently completed a Biodiversity risks and impacts assessment using a pre-determined methodology. Control and mitigation actions are in place for low to medium level risks.</p> <p>However, no significant risks related to the materiality of impacts on Biodiversity from land use and activities were identified within the Entity's Area of Influence. No specific Biodiversity Management Plan was required nor developed.</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as the Biodiversity risk assessment concluded that the risk on Biodiversity and Ecosystem Services from the land use and activities within the Facility's Area of Influence is low.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as the Biodiversity risk assessment concluded that the Facility has no Material impacts on Biodiversity values.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as the Biodiversity risk assessment concluded that the Facility has no Material impacts on Biodiversity values.
8.4 Alien Species	Conformance	<p>The Entity proactively prevents accidental or deliberate introduction of Alien Species. The Biodiversity risk and impact assessment addressed the risk of actual or potential introduction and proliferation of Alien Species. The actual risk is considered as low after control and mitigation measures are considered.</p> <p>No specific Alien Species Management Plan or Action Plan was required nor developed.</p>
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity as there are no World Heritage Properties adjacent to, nor within the Entity's Area of Influence. No exploration or development of New Projects, or the execution of any Major Changes in or near World Heritage Properties is planned.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity as there are no Protected Areas adjacent to, nor near the Entity's Area of Influence.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		

CRITERION	RATING	COMMENT
9.1a-d Human Rights Due Diligence	Minor Non-Conformance	<p>The Entity has established a 'stand-alone' Human Rights and Forced Labor Policy that references the United Nations Universal Declaration of Human Rights and aligns with internal Codes of Conduct. The Policy is publicly available and subject to a defined review cycle. Annual Code of Conduct training, which includes Human Rights content, is mandatory for all personnel. Document and data control procedures define a maximum review frequency of three years, with updates triggered by any business changes affecting Material Human Rights risks or evidence of control gaps.</p> <p>A technical standard on Environmental and Social Due Diligence has been developed at the Novelis Corporate level; however, no documented evidence was available to confirm that a formal Human Rights Due Diligence process has been conducted.</p> <p>No incidents have been identified that caused or contributed to any adverse Human Rights impacts. The Entity maintains a Complaints Resolution Mechanism referenced in its publicly disclosed Code of Conduct, available at: https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p> <p>However, there is no evidence that Affected Populations and Organisations have been consulted regarding any potential significant Human Rights impacts arising from operational activities.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity is committed to recognising the uniqueness of all Workers and with whom it collaborates, without regard to race, colour, gender, sexual orientation, language, religion, age, marital status, political or other opinion, national or social origin, property, birth or other status. This commitment is publicly disclosed in its Human Rights and Forced Labor Policy, available at: https://novelis.com/wp-content/uploads/2025/02/Human-Rights-Policy.pdf</p> <p>Various initiatives and programs are in place at both the Corporate and Entity level to promote and assure gender diversity, equity and women's empowerment.</p> <p>The Entity publicly discloses the effectiveness of the measures taken to promote gender equity on an annual basis in its annual Sustainability Report (on pages 15 and 50-52): https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity as there are no Indigenous Peoples present (as defined by the United States (US) Federal Government) in 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 present (as defined by the US Federal Government) in 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.

CRITERION	RATING	COMMENT
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 present (as defined by the US Federal Government) in the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	There are no sacred or cultural heritage sites and values identified 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 Indigenous Peoples present (as defined by the US Federal Government) in the Entity's Area of Influence.
9.6a-i Displacement	Conformance	<p>The Entity has developed a documented process to adhere to in the event of any infrastructure relocation or displacement to mitigate impacts on Affected Populations.</p> <p>However, no relocation, resettlement or displacement is currently underway nor is planned in the short, medium, or long term.</p>
9.7a-h Affected Populations and Organisations	Minor Non-Conformance	<p>The Entity engages with Local Communities through support for social, educational, and sponsorship initiatives.</p> <p>However, no documented plan was available to demonstrate a structured process for identifying, preventing, monitoring, mitigating, and accounting for significant potential environmental, social, cultural, or Human Rights impacts related to its operations.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Minor Non-Conformance	<p>The Entity has developed a Supply Chain Policy and various tools to verify the origin of materials sourced through its supply chain.</p> <p>However, there is no documented Management System in place that demonstrates full compliance with the steps of the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas.</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity has developed a Supply Chain Policy and various tools to verify the origin of materials sourced through its supply chain. When a potential supplier is likely to be operating in an identified Conflict-Affected and High-Risk Area, it is systematically rejected as a supplier.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>The Entity has developed a Supply Chain Policy and various tools to verify the origin of materials sourced through its supply chain. When a potential supplier is likely to be operating in an identified Conflict-Affected and High-Risk Area, it is systematically rejected as a supplier.</p> <p>When an actual or potential supplier is at risk or there is doubt as to the source of material from CAHRAs, an on-site audit is undertaken by Novelis to cross-check the supplier's compliance with the Entity's expectations.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	This ASI Performance Standard Audit satisfies the requirements of this Criterion.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Minor Non-Conformance	<p>The Entity provides information on its supply chain Due Diligence in the Novelis Responsible Minerals Sourcing Statement, available at: https://novelis.com/wp-content/uploads/2025/05/Novelis-Responsible-Minerals-Sourcing-Statement_0425.pdf</p>

CRITERION	RATING	COMMENT
		However, there is no evidence of public reporting of the Due Diligence systems and practices and no evidence that such a report is prepared on an annual basis.
9.9 Security practice	Conformance	<p>The Entity has an agreement with a third-party contracting firm for the management of access control to the facility and control access to employees, contractors and visitors according to the Entity's standards. The use of force and any containment method are strictly prohibited.</p> <p>In case of any on-site security issues, the Entity's 'intervention team' will be engaged to address the situation.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity is committed to respecting the right of Freedom of Association and Collective Bargaining through its Human Rights and Forced Labor Policy. The Policy is available at: https://www.novelis.com/wp-content/uploads/2025/02/Human-Rights-Policy.pdf</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the Entity does not operate in a country (United States) that does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	<p>The Entity does not hire any Worker under 16 years old. The Entity is committed to avoid the employment of underage Workers below the applicable lawful minimum working age. This commitment is formalized in its Human Rights and Forced Labor Policy, which is available at: https://novelis.com/wp-content/uploads/2025/05/Human-Rights-Policy_all-languages.pdf</p>
10.3a-c Forced Labour	Conformance	<p>The Entity does not engage in, nor supports trafficking in persons directly or indirectly, in any form. A commitment is stated in the Novelis Human Rights and Forced Labor Policy, which is available at: https://www.novelis.com/wp-content/uploads/2025/02/Human-Rights-Policy.pdf</p> <p>The Entity publicly discloses an annual Modern Slavery Statement, which is available at: https://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</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity has implemented a Code of Conduct and Supplier Code of Conduct that establish clear requirements prohibiting Discrimination in the workplace. All Workers are mandated to complete annual training on Discrimination prevention. For more information, refer to: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p>
10.5 Communication and engagement	Conformance	<p>The Entity has implemented a Code of Conduct that enables confidential reporting of potential violations related to Forced Labour, Child Labour, Harassment, and other unlawful practices. The Code is</p>

CRITERION	RATING	COMMENT
		<p>available at: https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p> <p>A formal Whistleblower Policy reinforces the right to report illegal behaviour without fear of retaliation. Refer to: https://novelis.com/wp-content/uploads/2025/02/Whistleblower-Policy.pdf</p> <p>All Workers are required to complete annual refresher training on the Code of Conduct, including procedures for reporting violations. For external Stakeholders, a formal communication process is available at: https://novelis.com/contact/</p>
10.6a-g Violence and Harassment	Minor Non-Conformance	<p>The Entity has established a formal Harassment and Workplace Violence Prevention Policy, with the latest version available at: https://www.novelis.com/wp-content/uploads/2025/02/Policy-Against-Harassment.pdf</p> <p>Additional supporting policies are maintained on the Entity's intranet platform. All documents are governed by a maximum three-year review cycle, with earlier updates triggered by Material business changes or identified control gaps.</p> <p>Mandatory annual training on workplace Violence and Harassment is completed by all employees, with attendance records maintained as objective evidence of implementation. Internal communication materials are displayed prominently to raise awareness and reinforce expectations.</p> <p>The current Occupational Health & Safety (OH&S) risk register does not include specific entries related to workplace Violence, Harassment, or broader psychosocial hazards. These risks have not yet been formally assessed or integrated into the existing OH&S Management System.</p>
10.7a-c Remuneration	Conformance	<p>The Entity does not issue individual employment contracts but ensures each Worker signs a document confirming acceptance of employment terms, including wages. Job descriptions are available for all roles, and employees are aware of their employment conditions.</p> <p>Wages are based on regional industry benchmarks and reviewed annually by a Compensation Team. During the Audit, Workers confirmed that wages paid meet their basic needs and align with living wage principles. Terms regarding working hours, leave and public holidays are detailed in the Employee Handbook.</p> <p>Salaries are paid either weekly or bi-weekly, with digital access to pay slips. Annual adjustments consider industry benchmarks, individual performance, and Health and Safety performance.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with federal regulations on working hours, with shifts organised in rotating schedules and extended daily durations. Overtime exceeding 40 hours per week is compensated at 1.5 times the regular hourly rate, as confirmed through Worker interviews undertaken during the Audit. Details regarding Remuneration, working hours, leave and public holidays are documented in the internal Employee Handbook.</p> <p>The Entity's shift system ensures that production employees do not work more than five days per week and do not exceed the equivalent of eight hours per day on a semestrial average basis.</p>

CRITERION	RATING	COMMENT
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity has established multiple channels to ensure Workers are informed of their rights and responsibilities. These include regularly scheduled toolbox meetings, shift briefings, and all-employee quarterly impact sessions.</p> <p>Interviews confirmed that Workers are aware of their right to refuse unsafe work, the grievance and complaint process, disciplinary procedures, and the main OH&S risks present in their work environment, along with related mitigation measures. Communication on these topics is reinforced through site-level orientations, mandatory annual training sessions, and access to internal policy documents.</p>

11. OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has implemented a documented Occupational Health and Safety (OH&S) Management System, certified under ISO 45001. The System includes internal procedures, defined roles and responsibilities, and structured processes to support safe work practices and effective communication.</p> <p>The Entity conducts job safety analyses to identify hazards and assess risk levels for operational tasks. Identified risks are managed through appropriate control measures, and mitigation efforts are regularly reviewed and updated.</p> <p>All documentation related to the OH&S Management System is up to date and available through the Entity's intranet. Incidents are reported through designated channels, and responses are managed in accordance with defined site procedures.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity applies a document control procedure that requires OH&S documents to be reviewed at least every three years, or prior if business changes introduce Material OH&S risks or reveal control gaps.</p> <p>Key OH&S performance indicators, including risk reduction scores, control effectiveness, and 'serious near miss' data are publicly disclosed in the 2025 OH&S Leading Indicators Report, available at: https://www.novelis.com/wp-content/uploads/2025/02/OHS-leading-indicators.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity has implemented a structured processes to support Worker engagement on Occupational Health and Safety issues. These processes include daily 'start-up' meetings, monthly Health and Safety discussions with selected Workers from all shifts, and quarterly site-wide safety meetings focused on incident reviews, Worker feedback, and performance recognition.</p> <p>Key safety information is displayed at the departmental level, and improvement actions are tracked through various software tools. Leading and lagging indicators including recordable incidents, serious injury prevention, and corrective action status are monitored and communicated via internal platforms.</p> <p>Emergency response drills are conducted and Health and Safety training is delivered during the onboarding of new Workers and refresher training is provided annually. While there is no formal Joint Health and Safety Committee, recurring engagement activities</p>

CRITERION	RATING	COMMENT
		provide workers with a platform to raise and address safety-related issues.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	30 June 2022	Initial Certification Audit – Full Certification
1	20 December 2024	Surveillance Audit
2	1 July 2025	Re-Certification and Scope Change Audit – Full Certification Scope Change to apply PS V3.1.