

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis (Koblenz)

CERTIFICATE NUMBER
145

ASI STANDARD
**PERFORMANCE
STANDARD
(V3.1 2023)**

DATE OF ISSUE
15 JUNE 2025

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

DATE OF EXPIRY
14 JUNE 2028

ASI ACCREDITED
AUDITING FIRM
SZI GMBH

CERTIFIED SINCE
31 AUGUST 2021

AUTHORISED BY

A stylized, handwritten signature in black ink, likely representing an authorized official of the Aluminium Stewardship Initiative.

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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 to produce Aluminium products, including casting, scalper, hot rolling, cold rolling and finishing at Novelis located in Koblenz, Germany.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis (Koblenz)
CERTIFICATION SCOPE	All activities to produce Aluminium products, including casting, scalper, hot rolling, cold rolling and finishing at Novelis located in Koblenz, Germany.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication• Material Conversion
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (23 – 25 March 2021)• Surveillance Audit (2 February 2022)• Surveillance Audit (22 – 23 November 2023)• Re-Certification Audit and Scope Change (20 – 22 May 2025)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">• 23 – 25 March 2021 (Initial Certification Audit)• 2 February 2022 (Surveillance Audit)• 22 – 23 November 2023 (Surveillance Audit)• 20 – 22 May 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 7 July 2021 (Initial Certification Audit)• 18 May 2022 (Surveillance Audit)• 18 December 2023 (Surveillance Audit)• 4 June 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (23 – 25 March 2021)</u></p> <p>The Audit Scope includes all activities on the Koblenz site (Germany) to produce aluminium products including casting, scalper, hot rolling, cold rolling and finishing.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• Casthouses• Semi-Fabrication• Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (March 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a ‘desktop’ exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and webcam footage of specific controls related to high risk activities.</p>

Surveillance Audit (2 February 2022)

The Audit Scope includes all activities on the Koblenz site (Germany) to produce aluminium products including casting, scalper, hot rolling, cold rolling and finishing.

Supply chain activities included in the Audit Scope:

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

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

Surveillance Audit (22 – 23 November 2023)

The Audit Scope includes all activities on the Koblenz site (Germany) to produce aluminium products, including casting, scalper, hot rolling, cold rolling and finishing.

Supply chain activities included in the Audit Scope:

- Casthouses
- 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 (20 – 22 May 2025)

The Audit Scope includes all activities on the Koblenz site (Germany) to produce aluminium products, including casting, scalper, hot rolling, cold rolling and finishing.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication
- Material Conversion

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

AUDIT OUTCOME	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	15 June 2025 – 14 June 2028
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	14 December 2026
CERTIFICATE NUMBER	145



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

The Novelis Koblenz plant (the 'Entity') is located in the west of Germany, in Rhineland-Palatinate and has been in operation since 1964 (as Kaiser Aluminum). The Entity specialises in the production of alloys for aerospace applications, such as semi-finished products including for wingskins, ribs and aircraft fuselage with more than 200 different alloys.

The Entity has one of the most powerful hot rolling mills in the world and is capable of hot-rolled products up to 3900 mm with a rolling force of up to 6000 tonnes. The production covers all value-adding steps, from casting and hot rolling to the production of plates, sheets and coils. With its own test foundry, its own R&D department and its cooperation with RWTH Aachen University, the Entity has various options for developing and testing new alloys and optimise the recycling processes.

Together with its customers Airbus, Boeing and Embraer, Novelis has developed a closed recycling loop to take back scrap for reuse.

The 37 hectare site is located in an industrial area close to the bank of the Rhine River, and employs approximately 1,350 people including 120 women.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of Systems, Residual Risk and Performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the ASI Performance Standard's legal Compliance requirements. There are systems in place to maintain awareness of and ensure Compliance with Applicable Law. The Entity holds ISO 14001, ISO 50001 and ISO 9001 certifications from an accredited certification body. Corporate Headquarters supports the Entity with legal counsel.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, consistent with Applicable Law and prevailing international standards. Among the instruments, a Code of Conduct is issued and communicated internally and externally. The Entity has provided training to employees with regard to business ethics. Corporate Headquarters operates a whistleblowing hotline where potential breaches or suspected Corruption can be reported confidentially. The Code of Conduct is available at: https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance. The Novelis Group Code of Conduct is available at: https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf Additionally, the Entity has a Supplier Code of Conduct, which suppliers are required to sign before delivering to Novelis: https://novelis.com/download/novelis-supplier-code-of-conduct
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Novelis Group Environment, Health, Safety and Quality (EHSQ) Policy is communicated internally via annual training and Worker announcements. The Policy is available to external Stakeholders at: https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf In accordance with the ASI Performance Standard, as well as the EHSQ Policy, the Entity has senior management endorsement and support through the provision of resources and regularly reviews the Policies. The Entity has obtained ISO 14001, ISO 9001, ISO 50001 and ISO 45001 certifications, which are consistent with the ASI Certification Scope. The Novelis EHSQ Policy is communicated both internally and externally. Internal communication is ensured through annual training and informational announcements.
2.2a-c Leadership	Conformance	The Novelis Chief Executive Officer (CEO) has the corporate responsibility and authority to ensure conformance with the ASI Performance Standard. Management Representatives have been appointed to have overall responsibility and authority to ensure conformance with the ASI Performance Standard at the Entity level.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Environmental Management System according to ISO 14001:2015. The Management System is certified by an accredited certification body: https://novelis.com/wp-content/uploads/2021/10/Certificate-Novelis-Koblenz-14001-2024-EN.pdf
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established an Environmental Management System certified according to ISO 14001:2015. Furthermore, the Entity has implemented and fulfils the requirements of a Social Management System (ISO 26000 aligned). Compliance is ensured through regular verifications and audits.
2.4a-e Responsible Sourcing	Conformance	The Entity's Supplier Code of Conduct is in accordance with the requirements of the ASI Performance Standard. Novelis has implemented a Responsible Sourcing Policy at a Group level, addressing environmental, social and governance issues: https://novelis.com/download/novelis-supplier-code-of-conduct/
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as it does not have New Projects or Major Changes to existing Facilities. However, the Entity has implemented systems to conduct internal risk assessments on environmental, social and Human Rights factors in the context with respect to New Projects and system changes. However, there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. The site is located in a highly regulated country (Germany) where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorisation process (including Human Rights). The Entity has systems in place to manage this effectively.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as it does not have New Projects or Major Changes to existing Facilities. However, the Entity has implemented systems to conduct internal risk assessments on environmental, social and Human Rights factors in the context with respect to New Projects and system changes. However, there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. The site is located in a highly regulated country (Germany) where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorisation process (including Human Rights). The Entity has systems in place to manage this effectively.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented an Emergency Response Plan. External Stakeholders, such as the Community and authorities are involved. Regular training with the local fire brigade, the Community and Workers is undertaken. The Emergency Response Plan is publicly disclosed at both gatehouses. Because of security issues (camera locations, names, etc.) it is not published online.
2.8a-d Suspended Operations	Conformance	The Entity has implemented a Business resilience plan. All involved parties are trained, and evacuations and fire drills are carried out frequently. An app has been introduced to support responsible persons in case of an emergency, breakdown, fire, or accident with all necessary documents and contact details.

CRITERION	RATING	COMMENT
2.9a-b Mergers and Acquisitions	Conformance	Acquisitions executed by Novelis Headquarters are accompanied by a Due Diligence process and supported by external specialists to reflect environmental, social and governance issues.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity systematically reviews environmental, social, and governance issues as part of its planning process. Closure, decommissioning and divestment are managed at the Corporate level. There has been no closure, decommissioning or divestment activity at the Entity since joining ASI.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity is incorporated within the Novelis Group sustainability reporting framework. The Group has publicly disclosed its governance approach and its Material environmental, social and economic impacts in the Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
3.2 Non-compliance and Liabilities	Conformance	Entity-specific information on significant fines, judgments, penalties and non-monetary sanctions are published by the district government (SGD Nord). Public access is ensured via the EU Directive 2003/4/EC executed as 'Environmental Information Act' (Umweltinformationsgesetz, UIG): https://www.umweltbundesamt.de/themen/nachhaltigkeit-strategien-internationales/umweltrecht/zugang-zu-umweltinformationen#hintergrund-und-ziele-des-umweltinformationsgesetzes
3.3a-c Payments to Governments	Conformance	The Entity complies with the strict local legislation and has implemented Policies and procedures to conform to this requirement. To prevent Corruption, detailed behaviour expectations are described in the Novelis Code of Conduct, which includes the requirements where payments are made to authorities. https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf https://novelis.com/download/novelis-supplier-code-of-conduct Payments to governments are not allowed. Relevant information is available in the annual financial reporting (section 13): https://investors.novelis.com/sec-filings/all-sec-filings/content/0001304280-25-000023/0001304280-25-000023.pdf?_gl=1*13yrrgg*_up*MQ.*_ga*MjEzMTkwMDE3LjE3NDc3NDElNjk.*_ga_6QYKVB7VNN*cze3NDc3NDElNjgkbzEkZzAkDDE3NDc3NDElNjgkajAkBDaKaDA
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity is certified against ISO 14001:2015 and ISO 9001:2015 and has implemented appropriate Complaints Resolution Mechanisms. A 'whistleblowing' and ethics hotline is in place: https://app.convercent.com/en-US/LandingPage/918012dd-5b57-eel1-a9a3-000d3ab9f062?_id=1695920313532 The Whistleblower Policy is disclosed: https://novelis.com/wp-content/uploads/2025/02/Whistleblower-Policy.pdf
4. MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has prepared Life Cycle Assessments (LCA) for its main Product groups. In cooperation with an external service provider, life cycle evaluations are carried out. At the customer's request, data will be sent to the provider and a new product related LCA will be created and sent to customer. The requirements of ISO 14040 are fulfilled.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity contributes life cycle inventory data to regional initiatives such as the Aluminium Association and European Aluminium's Sustainable Development Indicators (SDI). 'Cradle-to-gate' LCA's are provided to customers for their Products upon request.</p> <p>Relevant data can be accessed via the European Aluminium SDI: https://european-aluminium.eu/our-work/standards-life-cycle-assessment</p>
4.2 Product Design	Conformance	When developing new Products, the topic of sustainability is considered and a new life cycle analysis is undertaken. Environmental key metrics have been developed to enhance sustainability, including the environmental life cycle impacts of the end Product.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a working scrap management process. Aluminium Process Scrap is reduced to a minimum, and if scrap is generated, it is 100% recycled or reused. The Entity has a closed-loop production and Scrap is collected and sorted internally. Aluminium alloys and grades are recorded separately and recycled according to type.
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	<p>An Aluminium recycling strategy is in place. The established goals are fulfilled and a continuous increase in the recycling rate is targeted. The recycling strategy captures the Product from the beginning to its End of Life.</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
4.4d Collection and Recycling of Products at End of Life	Conformance	<p>An Aluminium recycling strategy is in place. The established goals are fulfilled and a continuous increase in the recycling rate is aimed for. The Novelis Group is actively engaged in European initiatives or groups that support and improve national collection rates.</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity is part of the international Greenhouse Gas (GHG) trade. Data including energy consumption, emissions, waste numbers, and water consumption are visible in working areas (shopfloor). The Entity's energy use by source is publicly disclosed on an annual basis in the Novelis Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>All data were independently verified before being published.</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.

CRITERION	RATING	COMMENT
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 has undertaken environmental operational activities to reduce energy consumption and GHG emissions including the setting of targets at both the regional and plant level, installation of meters and action plans. Key Performance Indicators (KPI's) relating to GHG Emissions and associated targets are provided in the annual Sustainability Report (pages 14 – 16) and Green Bond Report, available at:</p> <p>https://novelis.com/sustainability/fy2024-sustainability-report/#</p> <p>https://novelis.com/sustainability/green-bond-report-annual-report-2024</p> <p>The Entity has used the ASI GHG Emissions Reduction Pathway methodology to develop emissions reduction curves:</p> <p>https://www.novelis.com/wp-content/uploads/2025/02/ASI-Decarbonization-Pathway.pdf</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has undertaken environmental operational activities to reduce energy consumption and GHG emissions including the setting of targets at both the regional and plant level, installation of meters and action plans. KPI's relating to GHG Emissions and associated targets are provided in the annual Sustainability Report (pages 14 – 16) and Green Bond Report, available at:</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>https://novelis.com/sustainability/green-bond-report-annual-report-2024</p>
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented an ISO 14001 and ISO 5001 certified Management System, which is audited annually. Projects to reduce GHG emissions are described and implemented, and projects are tracked at both plant and regional levels.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Emissions to Air are controlled according to local regulations and permits. The emissions are monitored, controlled and reduced constantly. Data is disclosed via the Sustainability Report:</p> <p>https://novelis.com/sustainability/fy2024-sustainability-report/#</p>
6.2a-g Discharges to Water	Conformance	The Entity does not discharge any wastewater directly into bodies of water. The Entity has a license for wastewater that may be discharged into the public network and thus via the wastewater treatment plant. Monitoring of the limit values defined by the operating license is continuously monitored in accordance with specifications.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has performed risk assessments and implemented measures to prevent and detect contamination of air, water, and soil. Regular internal audits are conducted to verify the effectiveness and adherence to defined actions. Emergency procedures for major risk areas have been introduced. The Entity has performed risk assessments and implemented prevention measures for Material

CRITERION	RATING	COMMENT
		Leakages. Relevant Spills are reported to the authority and by the authority to all other relevant public interest parties (if necessary).
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The reporting of Spills is regulated, trained and tested. There have been no reportable Spills inside/outside the plant since the ISO 14001 certified Environmental Management System was implemented in 2018.
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste Management Strategy. The waste management goals have been fulfilled and there has been a reduction in the overall waste stream volume. The Strategy has been completed in accordance with the Waste Mitigation Hierarchy.</p> <p>The Authority may, if necessary, request the report of the Waste Officer. Regular monitoring by the district government verifies compliance with legal requirements: https://app.thru.de/details/637646/karte</p> <p>The Entity has publicly disclosed the quantities of Hazardous and Non-Hazardous Waste generated and the associated waste disposal methods in the Sustainability Report: https://de.novelis.com/sustainability/fy2024-sustainability-report/#</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 recycles 100% of the white Dross internally. Black Dross is sent to external local reproprocessors, who treat the Dross and return it as Aluminium bars.</p> <p>The residue from the Dross reproprocessors (i.e., small amount of Aluminium, salt, and Aluminium oxides) are re-used in the secondary Aluminium, building and agricultural/soil stabilisation industries. The Entity conducts regular periodic reviews with each Dross reproprocessor. Due to the requirements of the aviation industry, the processed Dross cannot be recycled. It is sold to other Aluminium companies.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity monitors water usage according to local regulations. An overview of the water inflows, various on-site consumption data and various wastewater flows are described and regularly reviewed. The Entity has assessed its water-related risks and implemented prevention measures accordingly in its entire Area of Influence. There are no risks detected. Water data are disclosed via the Sustainability Report: https://novelis.com/sustainability/fy2024-sustainability-report/#</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as no Material water-related risks were identified.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		

CRITERION	RATING	COMMENT
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted an Environmental Risk Assessment as part of approval procedures. The risk assessment addresses the Entity's Area of Influence and includes an assessment of Biodiversity impacts. There were no Material risks identified.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity as there were no Material Biodiversity impacts identified in the risk assessment. If required, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently, there are no open measures.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity, as there were no Material Biodiversity impacts identified in the risk assessment. Regardless, there is regular reporting during the annual management review and public reporting to the state environmental authorities.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as there were no Material Biodiversity impacts identified in the risk assessment. If required, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently, there are no open measures.
8.4 Alien Species	Conformance	The Entity has taken action to prevent the introduction of Alien Species. Packaging materials used for export materials (e.g., wooden pallets) are thermally treated (IPCC-treatment) to eliminate the risk of Alien Species introduction to other regions.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity, as there are no World Heritage sites in or near its Area of Influence.
8.6a-d Protected Areas	Conformance	The Entity is located in a drinking water protection area classified as 'Zone 3a' for which there are relevant requirements. This special requirement requires a separate operating permit with various monitoring mechanisms for each change. These are continuously monitored by the Entity and regularly checked by the authorities.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Novelis Group publicly subscribes to the United Nations Guiding Principles and has issued and communicated its Code of Conduct (Promote a Desirable Work Environment) and Supplier Code of Conduct (Labour and Human Rights), with a commitment to respecting Human Rights. Both Codes are available at:</p> <p>https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p> <p>https://novelis.com/download/novelis-supplier-code-of-conduct</p> <p>The Entity has not identified any issues that have caused or contributed to adverse Human Rights impacts. The Entity has established an 'Ethics Hotline'. Novelis supports the Ten Principles of</p>

CRITERION	RATING	COMMENT
		the United Nations Global Compact on Human Rights, Labour, Environment and Anti-Corruption: https://ungc-production.s3.us-west-2.amazonaws.com/attachments/Organization/129081/original/Novelis_Inc._-Letter_of_Recommitment.pdf?1542995069
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the women's rights requirements. The Entity is involved in the Novelis Group program 'Woman in Novelis' (WiN). This program aims to motivate, retain and develop all employees, focusing on building and celebrating a diverse culture that includes female employees. Targets are disclosed in the Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in Germany where the Entity operates.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion does not apply to the Entity, as no sacred or cultural heritage sites or values are present within the Entity's Area of Influence. Also, Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion does not apply to the Entity, as no sacred or cultural heritage sites or values are present within the Entity's Area of Influence. Also, Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion does not apply to the Entity, as there is no planned expansion of the entire plant, which may have an impact. However, the ASI Performance Standard's requirements will be considered as part of any new risk assessment.
9.7a-h Affected Populations and Organisations	Conformance	The Entity does not claim any resources that could lead to a lack of resources in the area and among its population. The Entity respects, and is sensitive to the neighbourhood, the Community and all other interest groups in the vicinity of the plant. An evaluation of the interested parties has been undertaken. Further information is available in the Sustainability Report:

CRITERION	RATING	COMMENT
		https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf The Entity meets the Novelis Group requirement to respect and support the livelihoods of Local Communities. The Entity actively participates in numerous social activities with the Local Communities.
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has implemented Management Systems and associated procedures to ensure it does not contribute to Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). To become a supplier, they must accept the Novelis Supplier Code of Conduct and confirm they follow the Code. The Code allows for the Entity to undertake audits or inspections of their suppliers and request self-assessments to ensure compliance. The Supplier Code of Conduct is available at: https://novelis.com/wp-content/uploads/2024/08/Novelis-Supplier-Code-of-Conduct-08232024.pdf
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity evaluates and assesses their suppliers based on various aspects of the Supplier Code of Conduct and assigns a risk score to each supplier. The risk score informs the Entity whether any action is required. Suppliers can be blocked if necessary.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	The Entity has implemented a Supplier management process and Supplier Code of Conduct that allows them to undertake audits or inspections at the supplier level and conduct an annual supplier evaluation. Risks are recognised at the identification stage, allowing them to react accordingly and on an ad hoc basis.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	The Entity's Management Systems are audited annually by an external certification body which includes internal audits for Due Diligence practices. The Entity's Due Diligence processes were included in this ASI Audit, which addresses the requirement.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	The Entity reports annually on the management of responsible sourcing, which is available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity itself performs most security functions and contracts an external security provider for gate control and plant security. The Entity does not employ armed security forces.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the local regulations on Worker's rights and applies a Collective Bargaining Agreement for the metallurgy sector. All Workers are free to join local Union organisations.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as there is no need for alternative means in the country (Germany) where the Entity is located.

CRITERION	RATING	COMMENT
10.2a-c Child Labour	Conformance	The Entity has implemented Policies and local regulations to avoid the hiring of Child Labour. The Entity has strict control over any potential Child Labour. The Entity neither uses nor supports the use of Child Labour and does not engage in or support Hazardous Child Labour. Young Workers are engaged for educational purposes only. If at all, work with hazardous substances happens only under supervision and as part of vocational education. The Entity does not engage in or support the Worst Forms of Child Labour.
10.3a-c Forced Labour	Conformance	<p>The Entity neither engages in, nor supports the use of Forced Labour and follows the hiring process and operations according to German law and ILO conventions. The Entity does not engage in, nor support Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and document review. Novelis has disclosed a stand-alone policy on Human Rights and Forced Labour:</p> <p>https://www.novelis.com/wp-content/uploads/2025/02/Human-Rights-Policy.pdf</p> <p>A stand-alone annual Modern Slavery Statement on what the Novelis Group has done to identify, prevent and address modern slavery and Human Trafficking is available at:</p> <p>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	The Entity ensures equal opportunities and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker based on gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. Positions are classified and are part of a Collective Bargaining Agreement. This was confirmed by interviews and document review.
10.5 Communication and engagement	Conformance	The Entity places significant importance to good relations with its employees and promotes a 'say anything' culture, which involves conducting employee engagement surveys. Interviews with the Works Council confirmed that the cooperation is effective. Discussions are also handled professionally and constructively.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has developed standards in collaboration with the Works Council that establish clear rules where the Entity neither engages in, nor tolerates the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual harassment, or verbal abuse of Workers. This was confirmed by interviews with the Works Council and document review. All employees attend culture workshops.</p> <p>Policy Against Harassment: https://www.novelis.com/wp-content/uploads/2025/02/Policy-Against-Harassment.pdf</p>
10.7a-c Remuneration	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard, as confirmed by document review and Worker interviews. Working Time, payment and leave are negotiated in the Collective Bargaining Agreement. The wages paid are substantially above the legal minimum and they are in line with the industry standard. The

CRITERION	RATING	COMMENT
		Entity's wage payments are timely, in legal tender and fully documented, as verified by interviews and document review.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreement and part of each employment contract. A clocking-in system is in place and records are kept.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their rights via various channels including the intranet and information boards. The Workers Council holds frequent meetings with Workers and a complaints management process is in place for employees.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System (not ISO 45001 certified), which is working effectively. Any identified non-conformances are actioned by the Entity. Internal and external audits are conducted to confirm the effectiveness of the OH&S system.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has implemented an OH&S Management System that conforms to the requirements of ISO 45001. Lagging Indicators are disclosed in the Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>Leading Indicators and comparative analyses of performance with peer Businesses and leading practice, which is only possible with internal peer businesses due to data availability, are disclosed at: https://www.novelis.com/wp-content/uploads/2025/02/OHS-leading-indicators.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	Employees are engaged in the preparation of risk assessments. Safety Officers have a mandate in the regular OH&S Committee meetings, which are held quarterly. Accidents are reported internally and externally to relevant parties and if necessary, to authorities.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	31 August 2021	Initial Certification Audit - Provisional Certification
1	15 June 2022	Surveillance Audit – Full Certification
2	14 February 2024	Surveillance Audit
3	18 July 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI PS V3.1