

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis Aluminum (Zhenjiang) Co., Ltd.

CERTIFICATE NUMBER
220

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
**DNV BUSINESS
ASSURANCE
SERVICES UK LTD.**

DATE OF ISSUE
15 AUGUST 2025

DATE OF EXPIRY
14 AUGUST 2028

CERTIFIED SINCE
30 AUGUST 2022

AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a large 'A' and 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

The Novelis Aluminum (Zhenjiang) Co., Ltd Facility located in Zhenjiang, Jiangsu, China. The main products are pre-stretched plates and wing skin plates for the aerospace industry and high-end commercial plates. The production process includes casthouses, hot rolling, stretching and machining.

AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Aluminum (Zhenjiang) Co., Ltd.
CERTIFICATION SCOPE	The Novelis Aluminum (Zhenjiang) Co., Ltd Facility located in Zhenjiang, Jiangsu, China. The main products are pre-stretched plates and wing skin plates for the aerospace industry and high-end commercial plates. The production process includes casthouses, hot rolling, stretching and machining.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Casthouses• Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (4 – 6 July 2022)• Surveillance Audit (6 – 8 December 2023)• Re-Certification Audit and Scope Change (24 – 25 April 2025)
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 4 – 6 July 2022 (Initial Certification Audit)• 6 – 8 December 2023 (Surveillance Audit)• 24 – 25 April 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 20 July 2022 (Initial Certification Audit)• 21 December 2023 (Surveillance Audit)• 16 June 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (4 – 6 July 2022)</u></p> <p>The Audit Scope includes all activities on the Zhenjiang site to produce Aluminium products.</p> <p>The 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><u>Surveillance Audit (6 – 8 December 2023)</u></p> <p>The Audit Scope includes all activities on the Zhenjiang site to produce Aluminium products.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">• 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 (24 – 25 April 2025)

The Audit Scope includes all activities on the Zhenjiang site to produce Aluminium products.

Supply chain activities included in the Audit Scope:

- Casthouses
- Semi-Fabrication

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

15 August 2025 – 14 August 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

14 February 2027

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220



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

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

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

ENTITY OVERVIEW

Novelis Inc. (the 'Group') is a manufacturer of rolled Aluminium products and is the largest Aluminium recycler worldwide.

Novelis Aluminum (Zhenjiang) Co., Ltd. (the 'Entity') was established in 2011 with operations actively commencing in 2013. The Entity's Facility is located in the Jingkou Economic Development Zone, Zhenjiang, Jiangsu Province, China, and covers a total area of 27 hectares. Its main products include pre-stretched Aluminium alloy sheets for aviation, high-end commercial Aluminium alloy sheets and wing panels.

The Entity's aerospace Aluminium sheets are primarily supplied to global aircraft manufacturers in Europe, United States, Canada and China. The main production processes involve re-melting, ingot casting and hot rolling. The Entity's design capacity is for 39,000 tonnes of product per annum. The Entity currently employs approximately 580 Workers.

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	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	Medium	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented comprehensive Policies, systems, and procedures to ensure full Compliance with Applicable Law. The Legal Compliance Department oversees Compliance with Laws, regulations, and obligations, conducting annual reviews to align with evolving standards. All relevant legal and customer requirements have been thoroughly identified, and the Entity has consistently maintained Compliance without significant issues.
1.2 Anti-Corruption	Conformance	The Entity has implemented robust anti-Corruption Policies including the Anti-Corruption Management Procedure. Implementation of the Policies is supported by regular personnel trained in Compliance, with training verified through documented records. The Entity strictly adheres to Applicable Laws and International Standards to combat Corruption, Extortion and Bribery. Additionally, the Entity has established a 'Whistleblower Policy', providing a secure, confidential, and retaliation-free mechanism for reporting misconduct or policy violations. The Entity's Code of Conduct is available at: https://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
1.3a-e Code of Conduct	Conformance	The Entity has developed and implemented a comprehensive Code of Conduct that addresses key Environmental, Social, and Governance (ESG) principles. To ensure effective adoption, the Entity has introduced training programs and communication initiatives to promote awareness among employees, business partners and suppliers. Demonstrating its commitment to transparency and accountability, the Code of Conduct is available at: https://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
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has established a comprehensive ASI Management Policy that integrates commitments to environmental stewardship, Human Rights, Health and Safety, and responsible procurement practices. These Policies are detailed in the Social Responsibility Manual and are effectively communicated internally to employees and externally to stakeholders. The Policy is available at: https://zh-hans.novelis.com/wp-content/uploads/2025/04/02-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E7%A4%BE%E4%BC%9A%E8%B4%A3%E4%BB%BB%E6%89%8B%E5%86%8C.pdf</p> <p>The Entity ensures the Policy's relevance and effectiveness through annual reviews and promptly revises it in response to significant operational changes affecting ESG risks, or upon identifying control deficiencies.</p>
2.2a-c Leadership	Conformance	The NOS Manager, as a member of senior management, serves as the ASI Management Representative, whom is responsible for establishing, implementing, and promoting ASI Standards within the Entity. To

CRITERION	RATING	COMMENT
		ensure effective implementation, a cross-Departmental ASI Working Group has been formed to drive the integration of ASI Standards across all operations. ASI Policies and management procedures are actively communicated to all employees through comprehensive training programs, fostering awareness and alignment throughout the organisation.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has developed and implemented an Environmental Management System and holds a valid ISO 14001:2015 Certificate.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has developed and implemented a Social Management System aligned with the ASI Performance Standard, focusing on the identification and assessment of social impacts and risks, including Human Rights, Occupational Health and Safety and business ethics. To address these risks, the Entity has established comprehensive management provisions designed to effectively prevent or mitigate potential adverse impacts.
2.4a-e Responsible Sourcing	Minor Non-Conformance	<p>The Entity has implemented the Novelis Global Supplier Code of Conduct and conducts second-party Due Diligence audits at major next-tier suppliers' sites for qualification. The procurement team and relevant personnel undergo annual training on responsible sourcing requirements. The Supplier Code of Conduct is available at: https://zh-hans.novelis.com/wp-content/uploads/2024/08/CHS_Novelis-Supplier-Code-of-Conduct-08232024.pdf</p> <p>In accordance with its ASI documented management procedure, purchasing policies are reviewed periodically during management review meetings and updated as required, in response to significant changes in business operations affecting ESG risks, or when control deficiencies are identified.</p> <p>However, Due Diligence audits for several 'Category A' raw material suppliers were not conducted in accordance with the Entity's procedures.</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no New Projects or Major Changes to the existing plant.</p> <p>The Entity however has developed a process to conduct environmental, social, cultural and Human Rights Impact Assessments, including gender analysis, for New Projects or Major Changes to existing facilities.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity as there are no New Projects or Major Changes to the existing plant.</p> <p>The Entity however has developed a process to conduct environmental, social, cultural and Human Rights Impact Assessments, including gender analysis, for New Projects or Major Changes to existing facilities.</p>
2.7a-f Emergency Response Plan	Conformance	The Entity holds a valid ISO 14001:2015 Certification and has achieved Jiangsu Province Safety Production Standardisation (Level 2). The Entity has established Emergency Response Plans which were developed in collaboration with potentially affected Stakeholder groups such as Communities, Workers and their representatives, and relevant agencies. The Emergency Response Plans on social,

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		<p>Occupational Health and Safety and environmental accidents are implemented, and relevant personnel are trained. The Emergency Response Plans will be reviewed every five years, or when there is a major change or control gap identified.</p> <p>The Emergency Response Plans for production safety and environment incidents are available at: https://www.novelis.com/wp-content/uploads/2025/04/10-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E7%94%9F%E4%BA%A7%E5%AE%89%E5%85%A8%E4%BA%8B%E6%95%85%E5%BA%94%E6%80%A5%E9%A2%84%E6%A1%88.pdf and;</p> <p>https://www.novelis.com/wp-content/uploads/2025/04/11-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E7%AA%81%E5%8F%91%E7%8E%AF%E5%A2%83%E4%BA%8B%E4%BB%B6%E5%BA%94%E6%80%A5%E9%A2%84%E6%A1%88.pdf</p>
2.8a-d Suspended Operations	Conformance	The Entity has developed and implemented a documented Business Continuity Plan to manage situations requiring operational suspension or significant changes due to external factors. The Entity has demonstrated a commitment to adhering to the prevailing legal and corporate policies that govern the process of redundancies. The plan addresses Material ESG risks from business changes or control gaps, and it is reviewed annually to ascertain its effectiveness. No suspension of activities has occurred in the previous three years.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has developed and implemented a management procedure for mergers and acquisitions. The Entity's leadership team has committed to follow strict rules when deciding whether to merge or acquire another company. This process includes reviewing ESG practices to ensure alignment with the ASI Performance Standard, as well as addressing considerations related to historic Aluminium operations. There have been no mergers or acquisitions in the previous three years.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity's parent company, the Novelis Group has established a Corporate level management procedure for closure, decommissioning, and divestment in alignment with the ASI Performance Standard. The Entity's senior management are committed to reviewing ESG practices during the planning process for such activities in the future and will develop a plan to monitor Material ESG impacts. No such activities have occurred in the previous five years.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity is included in the scope of the Novelis Group's Sustainability Report. The annual Sustainability Report for the Novelis Group is available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to

CRITERION	RATING	COMMENT
		comply with Applicable Law. There have been no significant fines or penalties imposed on the Entity, as reported in 2024 Sustainability Report.
3.3a-c Payments to Governments	Conformance	<p>The Entity's financial data are consolidated and disclosed by Novelis Group, which regularly publishes this information at https://investors.novelis.com/financial-information/financial-results</p> <p>In accordance with the Novelis Group Code of Conduct, the Entity only makes payments to governments on a legal or contractual basis, such as taxes, and has not made political donations, either directly or indirectly, through financial or in-kind contributions.</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity has established and effectively implemented a Complaints and Grievances Resolution Mechanism. The complaint resolution process is documented in the Entity's management procedure and is available at: https://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</p> <p>No significant complaints have been received to date. Complaints, grievances and Stakeholder concerns and resolution approaches are included in the annual management review meeting. The Entity commits to review the Complaints and Grievances Resolution Mechanism after any changes to the Business that may alter Material ESG risks, or if there is any indication of a control gap.</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Minor Non-Conformance	<p>The Entity has completed an Environmental Life Cycle Assessment (LCA) as part of its commitment to sustainable environmental management, supported by an ISO 14001:2015 Certified Environmental Management System to identify and evaluate environmental impacts and risks. Lifecycle impact assessments for its primary Product, aircraft Aluminium plate, are conducted using professional software, with reports prepared in accordance with the ISO 14040 and ISO 14044 Standards.</p> <p>However, the Entity has not reassessed life cycle impacts in a timely manner to consider factors such as the proportion of Aluminium produced with hydropower used in raw materials.</p>
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity's Life Cycle Assessment (LCA) Report provides 'cradle-to gate' information on its Aluminium Products. The LCA Report covers all Product processes and production lines. The LCA report is available at: https://novelis.com/wp-content/uploads/2025/04/15-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E9%93%9D%E5%90%88%E9%87%91%E4%B8%AD%E5%8E%9A%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%8ALCA-report.pdf</p>
4.2 Product Design	Conformance	The Entity integrates relevant objectives into the design and development process for Products to enhance sustainability, including the environmental life cycle impacts of the end Products.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has minimised the generation of Aluminium Process Scrap within its own operations and, where generated, targets 100% of Scrap

CRITERION	RATING	COMMENT
		<p>Tool. However, the Facility level GHG Emissions Reduction Plan uses percentage reductions without presenting actual numeric targets. The Plan appears to use total carbon emissions, rather than the carbon intensity used in the ASI method. The Facility level GHG Emissions Reduction Plan is available at: https://novelis.com/wp-content/uploads/2025/04/01-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%E5%85%AC%E5%8F%B8%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</p> <p>The Entity's parent group has implemented a global Carbon Footprint Strategy to 2050 that is applicable to the Entity. The strategy includes goals to reduce the Carbon footprint by 30% by 2026 and to achieve 'carbon neutrality' by 2050.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	The Entity's parent group has implemented a global Carbon Footprint Strategy to 2050 that is applicable to the Entity. The strategy includes goals to reduce the Carbon footprint by 30% by 2026 and achieve 'carbon neutrality' by 2050.
5.4 GHG Emissions Management	Conformance	To achieve the GHG Emissions Reduction Plan targets, relevant management programs are established and provide the detailed implementation actions for each emission source. The Entity has defined processes on how to monitor and evaluate the achievement status of the targets and how to quantify the GHG emission of each source. The performance status of the targets is periodically reviewed and revised, as required.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Emissions to Air are monitored and monitoring reports indicate that emissions meet legal emission limits. In compliance with the operational control requirements of ISO 14001, the Entity has implemented an Emissions to Air Management Plan with specific actions and controls. The Entity's control plans are evaluated in the annual internal audit and in the annual management review meeting.</p> <p>The Entity's Material Emissions to Air for 2024 are available in the Corporate Environmental Information Disclosure at: https://www.novelis.com/wp-content/uploads/2025/04/12-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%E5%85%AC%E5%8F%B82024%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>
6.2a-g Discharges to Water	Conformance	<p>Discharges to Water are managed within the Entity's Environmental Management System. The wastewater generated by the Entity is collected, treated and discharged into the Municipal Drainage System for further treatment. Wastewater discharge is monitored, and the major pollutants are below local legal discharge limits. The operation of wastewater treatment process is evaluated in the annual internal audit.</p> <p>The Entity's Material Discharges to Water for 2024 are included in the Corporate Environmental Information Disclosure, available at: https://www.novelis.com/wp-content/uploads/2025/04/12-</p>

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		%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B82024%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%B%E6%95%B0%E6%8D%AE.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has assessed areas of operations where Spills and Leakage may contaminate air, water and soil, using a risk-based process.</p> <p>In response to the Spills and Leakage risk assessment, the Entity has established appropriate control measures in daily operational procedures and implemented the Emergency Response Plan for environmental accidents associated with Spills and Leakages. Relevant personnel are provided with training.</p> <p>The Entity's Seepage and Leakage Risk Identification and Risk Assessment is available at: https://www.novelis.com/wp-content/uploads/2025/04/08-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%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>In accordance with the Novelis Group Social Responsibility Manual, the Entity has defined a process to disclose any major Spill or Leakage incident to all relevant interested parties, including the quantity and nature of the material involved and any potential impact.</p> <p>No Spill or Leakage incidents have occurred in the previous three years.</p> <p>The Entity's Seepage and Leakage Risk Identification and Risk Assessment includes a statement on any Spills and Leakages in the relevant reporting period, and is available at: https://www.novelis.com/wp-content/uploads/2025/04/08-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%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>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste Management Strategy according to the Waste Mitigation Hierarchy. The disposal of Hazardous Waste is undertaken in Compliance with legal requirements. Waste Management is addressed by the Entity's Environmental Management System.</p> <p>The quantities of regular industrial Non-Hazardous Waste and of Hazardous Waste generated during the 2024 reporting period are available in the Corporate Environmental Information Disclosure, available at: https://www.novelis.com/wp-content/uploads/2025/04/12-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B82024%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%B%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.

CRITERION	RATING	COMMENT
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>Dross is classified as a Hazardous Waste in China and is collected and transferred to suppliers licensed by the environment protection bureaus. The Entity collects 100% of the Dross it produces and stores it temporarily before transferring to the licensed supplier for disposal, in Compliance with Applicable Law.</p> <p>In accordance with the suppliers' Hazardous Wastes treatment permit, the disposal suppliers extract Aluminium from the Dross, and the remaining components of the Dross are recycled. No landfilling of Dross occurs.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>Water is sourced from the municipal water supply and usage is tracked and documented. The legally required Permit for Water Discharge into the Municipal Drainage System has been provided to the Entity by the government agency for sanitary wastewater. The water consumption and discharge amounts are reported and analysed annually.</p> <p>The Entity has conducted a water-related risk assessment as part of its approved Environmental Impact Assessment (EIA) Report and pollutant discharge permit. The Entity's operational, internal and external water-related risks in its Area of Influence have been considered. Due to the nature of the Product and production processes, as well as the external water environment, the level of water-related risk is assessed as low.</p> <p>The Entity's water withdrawal source, total water abstraction volumes and total water usage intensity are available in the Group Sustainability Report, Page 70, at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as no significant water-related risks were identified in the Entity's Area of Influence.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has conducted a Biodiversity and Ecosystem Services risk assessment. The Entity has assessed the risks and impacts on Biodiversity and Ecosystem Services from its operations within its Area of Influence. The Entity has assessed the relevant risks as low. The Entity's Biodiversity and Ecosystem Services Risk Assessment Report is available at: https://novelis.com/wp-content/uploads/2025/04/09-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%E5%85%AC%E5%8F%B8%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</p>
8.1b Biodiversity and Ecosystem Services Risk	Not Applicable	This Criterion is not applicable to the Entity as the risks and impacts to Biodiversity and Ecosystem Services were assessed and documented as low.

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and Impact Assessment - Priority		
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as the risks and impacts to Biodiversity and Ecosystem Services were assessed and documented as low.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as the risks and impacts to Biodiversity and Ecosystem Services were assessed and documented as low.
8.4 Alien Species	Conformance	The Entity processes and handles wooden pallets to avoid the introduction of Alien Species. Wooden pallets are identified as the key risk for the introduction of Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity has made a 'No Go' commitment in World Heritage Properties. The Entity is not conducting any operations in World Heritage Properties.
8.6a-d Protected Areas	Conformance	As identified in the Entity's Environmental Impact Assessment Report and the Novelis Social Responsibility Manual, there are no Protected Areas present within 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		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has implemented a Human Rights and Forced Labour Policy, demonstrating its commitment to upholding Human Rights, promoting gender equality, and adhering to the UN Guiding Principles (UNGPs) on Business and Human Rights. The Entity's Human Rights and Forced Labour Policy is available at: https://zh-hans.novelis.com/wp-content/uploads/2025/05/Human-Rights-Policy_all-languages.pdf</p> <p>A comprehensive Human Rights Due Diligence process has been implemented, including periodic supply chain evaluations. Information relating to community engagement and Grievance Resolution Mechanisms can be found in the annual Sustainability Report. Based on a thorough evaluation of its Human Rights Impact Assessment, management reviews, and stakeholder grievance records, the Entity has determined it has not been responsible for any significant adverse Human Rights impacts. If any negative impacts are identified, the Entity is committed to providing remedies through legitimate processes.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has implemented a comprehensive management procedure to protect female employees, demonstrating its commitment to gender equity and women's empowerment across the Entity. The Entity has made public disclosures regarding its Gender Equity Policy. The Entity provides data on the performance of initiatives undertaken to advance gender equity in the Diversity and Inclusion segment of its annual Sustainability Report, available at:

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		https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples 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 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.
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 the Entity's Area of Influence.
9.5a Cultural and Sacred Heritage – Identification	Conformance	The Entity has established procedures to identify cultural and religious sites and has collaborated with the local government to conduct risk assessments aimed at minimising impacts on such sites. The assessment report for the project confirms the Entity currently does not have a significant impact on cultural and religious sites within its Area of Influence.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as the assessment report for the project confirms the Entity currently does not have a significant impact on cultural and religious sites within its Area of Influence. There are no Indigenous Peoples in the Entity's Area of Influence.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as no resettlement has been caused by the Entity to date, and no New Projects have been developed since the Entity joined ASI. The Entity has established a procedure on resettlement and has established management procedures for new project investment developments, which must be approved by the local authority.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has implemented a Stakeholder engagement process to identify and address the key concerns of affected individuals and organisations. To effectively respond to any concerns raised, the Entity has developed a series of plans within the Novelis Group's sustainability framework, including an Environmental Management Plan and a Community Development Plan. The Entity conducts regular annual reviews of the implementation of these plans and identifies and implements any necessary improvements.</p> <p>The Entity reports its actions and performance in community development via its annual Sustainability Report, available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	The Entity has established a Policy and Management Procedure on Conflict-Affected and High-Risk Areas (CAHRAs) inclusive of its Supply Chain Policy. The procedure has clearly defined responsibilities and

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		<p>allocated resources, information gathering mechanisms, and requires active engagement with suppliers.</p> <p>The Policy is communicated to the Entity's suppliers and customers, and is available at: https://zh-hans.novelis.com/wp-content/uploads/2025/05/Novelis-Responsible-Minerals-Sourcing-Statement_0425.pdf</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	The Entity conducts regular risk assessments to identify and evaluate potential risks within its supply chain. It is important to note that the Entity does not utilise 'conflict minerals' and ensures that no materials are sourced from CAHRAs. Furthermore, the Entity is committed to addressing critical Human Rights issues, including Child Labour and Forced Labour, and ensures that these practices are not present within its supply chain.
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	Based on the records of the Entity's supply chain risk assessment, it has been determined that the Entity does not utilise conflict minerals, source materials from CAHRAs, nor does it have any critical Human Rights issues such as Child Labour or Forced Labour in its supply chain.
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	As the part of its Due Diligence process, the Entity conducts Audits against the ASI Performance Standard which addresses the requirements related to CAHRAs and confirms that the bauxite within the Entity's supply is not sourced from CAHRAs.
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity reviews its supply chain Due Diligence process and its performance, and reports to its Corporate head office accordingly.</p> <p>The Entity reports on its supply chain Due Diligence in its Factory Supplier Due Diligence Report, available at: https://zh-hans.novelis.com/wp-content/uploads/2025/04/05-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%E5%85%AC%E5%8F%B8%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	Security services are outsourced, and the security contractor complies with the Entity's Supplier Code of Conduct. Body searches, including any restriction of free movement are not permitted. There have been no grievances or complaints received against security activities.
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 it complies with the Applicable Laws regarding Freedom of Association and Collective Bargaining in China.
10.1d Freedom of Association and Right to Collective Bargaining – Alternative means in context of Applicable Law	Conformance	The Entity's senior management are committed to respecting the Right of Freedom of Association and Collective Bargaining. Workers' representatives are democratically elected by employees every five years. Regular meetings between Worker representatives and senior management are held on a monthly basis, providing a platform for open communication and discussion between Workers and senior management. During these meetings, Workers' concerns and issues are addressed and discussed.

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10.2a-c Child Labour	Conformance	<p>The Entity has established and implemented Policies that explicitly prohibit the use of Child Labour and ensure the protection of young Workers.</p> <p>At the time of the Audit, no individuals who would be classified as Child Labour or young Workers are hired in the Entity. The commitment to upholding the Rights and well-being of children is a fundamental aspect of the Entity's operations.</p>
10.3a-c Forced Labour	Conformance	<p>The Entity has established a comprehensive policy that strictly prohibits Forced Labour, including Human Trafficking. This Policy applies to the Entity itself and to its suppliers.</p> <p>No instances of illegal wage deduction, Debt Bondage, or any other indication of Forced Labour has been identified or reported within the Entity.</p> <p>The Entity's parent company has publicly disclosed its annual report on combating Forced Labour and Child Labour 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> <p>The Entity has further released its own annual Modern Slavery Statement within its Environmental and Social Impact Assessment Report available at: https://zh-hans.novelis.com/wp-content/uploads/2025/04/03-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%E5%85%AC%E5%8F%B8%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>
10.4a-c Non-Discrimination	Conformance	<p>The Entity upholds a strong commitment to non-Discrimination, with no reported cases of Discrimination to date. Employment decisions, as reflected in recruitment advertisements and training plans, are strictly based on candidates' qualifications and their ability to meet job requirements. Workers interviewed expressed that they feel treated equally within the Entity, reinforcing its commitment to fairness and inclusivity.</p>
10.5 Communication and engagement	Conformance	<p>The Entity commits to open and transparent communication through regular meetings between Worker representatives and senior management. Additionally, a grievance and complaints hotline has been established and communicated to ensure accessibility for Workers. These mechanisms, together with the Entity's operating procedures, promote direct engagement with Workers and their representatives on matters related to working conditions, workplace concerns, and compensation issues. This approach ensures that such discussions take place without fear of reprisal, intimidation, or Harassment, reinforcing a safe and supportive work environment.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has implemented robust policies that strictly prohibit Harassment and bullying in any form. To ensure all employees are well-informed, a comprehensive brochure has been carefully designed and distributed across the workforce. The Entity's Anti-Violence and Harassment Policy clearly outlines its commitment to ensuring a safe and respectful workplace. Regular training sessions are held to reinforce these principles and promote awareness. The Entity's Anti-Violence and Harassment Policy is available at: https://novelis.com/wp-content/uploads/2024/12/05-</p>

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		%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E5%8F%8D%E6%9A%B4%E5%8A%9B%E5%92%8C%E9%AA%9A%E6%89%B0%E6%94%BF%E7%AD%96.pdf
10.7a-c Remuneration	Conformance	Wages are accurately documented and paid by bank transfer on a monthly basis. Detailed information on wages, allowances, Overtime, and deductions is accessible through the Entity's internal systems.
10.8a-c Working Time	Conformance	The Entity carefully documents its Workers' Working Hours. The standard working week is 40 hours across an average of five days. The workshop is organised into four groups, each comprising three shifts. In contrast, office staff operates on a single shift basis. The Entity has adopted a distinctive shift system, whereby employees work for six days, followed by two days of rest, and then work for two days and rest for one day. The shifts are systematically rotated every two days. Each shift cycle is eleven days in duration, ensuring that employees have at least one day off every seven days and average daily working hours of eight hours or less in the past six months.
10.9a-b Informing Workers of Rights	Conformance	The Entity has communicated to its workforce the rights afforded to them and has facilitated cooperation and communication with the workforce through orientation training, the provision of an Employee Handbook, and the placement of billboards on-site. The Entity is committed to complying with relevant Chinese national laws and regulations.
11. OCCUPATIONAL HEALTH AND SAFE		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>The Entity has established, implemented, maintains and continually improves its documented Occupational Health and Safety (OH&S) Management System. The Entity regularly conducts a self-assessment against the Work Safety Standardisation Level Two Standard, developed by the Chinese government. At the time of the Audit, the Entity is applying for re-certification to the Work Safety Standardisation Level Two Standard .</p> <p>The Entity holds all licenses, permits and test records required by the legal requirements. Current operational controls on OH&S hazards are implemented and considered effective.</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has implemented a process to review the OH&S Management System based on its performance, any change in operations, legal requirements or other relevant factors. The Entity makes applicable changes as required. It conducts an annual document review and a periodic self-assessment against Work Safety Standardisation Level Two standard.</p> <p>The Entity has publicly disclosed the performance of the OH&S Management System in the 2024 reporting period, including leading and lagging indicators and a comparative analyses of performance with peer Businesses and leading practice. This information is included in the OH&S Management System Effectiveness Report available at: https://www.novelis.com/wp-content/uploads/2025/04/04-%E8%AF%BA%E8%B4%9D%E4%B8%BD%E6%96%AF%E9%93%9D%E4%B8%9A%EF%BC%88%E9%95%87%E6%B1%9F%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8%E8%81%8C%E4%B8%9A%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</p>

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11.2 Employee engagement on Health and Safety	Conformance	The Entity has implemented several mechanisms by which the Workers can raise, discuss, and participate in the resolution of Occupational Health and Safety (OH&S) issues with management. Workers are encouraged to report their concerns or advice on OH&S issues directly or through their Worker representative to management.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	30 August 2022	Initial Certification Audit – Full Certification.
1	20 February 2024	Surveillance Audit
2	15 August 2025	Re-Certification Audit and Scope Change – Full Certification Removal of supply chain activity ‘Material Conversion (Production and Transformation)’ to more accurately represent the Entity’s activities. Scope Change to apply Performance Standard V3.1.