

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis Italia S.p.A. (Pieve)

CERTIFICATE NUMBER
127

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
SZI GmbH

DATE OF ISSUE
19 APRIL 2025

DATE OF EXPIRY
18 APRIL 2028

CERTIFIED SINCE
31 MARCH 2021

AUTHORISED BY

A stylized, handwritten signature in black ink, consisting of a large, flowing 'J' followed by a horizontal line.

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 Pieve site to
produce Aluminium products
including remelting/recycling,
continuous casting and cold rolling.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Italia S.p.A. (Pieve)
CERTIFICATION SCOPE	All activities on the Pieve site to produce Aluminium products including remelting/recycling, continuous casting and cold rolling.
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 (20 – 22 January 2021)Surveillance Audit (23 November 2021)Re-Certification Audit and Scope Change (18 – 20 March 2025)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">20 – 22 January 2021 (Initial Certification Audit)23 November 2021 (Surveillance Audit)18 – 20 March 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">18 March 2021 (Initial Certification Audit)6 April 2022 (Surveillance Audit)16 June 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (20 – 22 January 2021)</u></p> <p>The Audit Scope includes all activities on the Pieve site to produce Aluminium products including remelting/recycling, continuous casting and cold rolling.</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>At the time of the Audit (January 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.</p> <p><u>Surveillance Audit (23 November 2021)</u></p> <p>The Audit Scope includes all activities on the Pieve site to produce Aluminium products including remelting/recycling, continuous casting and cold rolling.</p>

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

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

Re-Certification Audit and Scope Change (18 – 20 March 2025)

The Audit Scope includes all activities on the Pieve site to produce Aluminium products including remelting/recycling, continuous casting and cold rolling.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

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

19 April 2025 – 18 April 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

18 October 2026

CERTIFICATE NUMBER

127



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 Italia S.p.A. (Pieve) ('the Entity') commenced operations in 1990 and is located in Pieve, Italy. The Entity produces Aluminium and its alloys coils through continuous caster, cold rolling and finishing processes. The Entity includes five continuous caster lines, one cold rolling mill, five ageing ovens, one slitter line and a grinding workshop, in addition to production and administrative offices and a solar park.

The Entity supplies Aluminium coil to the Novelis Bresso plant, as well as shipping sheet and coil to external customers primarily in the building sector for applications such as roofing, gutters and building facades. Current annual production is approximately 70,000 tonnes and the Entity employs approximately 180 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	Medium	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 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, ISO 45001 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 used, a Code of Conduct is issued and communicated internally and externally. The Entity has provided training to employees with regards to business ethics. Corporate Headquarters operates a 'whistleblowing hotline' where potential breaches or suspected Corruption can be reported confidentially.
1.3a-e Code of Conduct	Conformance	<p>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</p> <p>Additionally, the Entity has a Supplier Code of Conduct that is available at: https://novelis.com/download/novelis-supplier-code-of-conduct/</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Novelis Group Environment, Health, Quality, Safety (EHQS) Policy is communicated by the Entity both internally and externally. Internal communication is ensured through annual training and regular announcements. The Policy is available to external Stakeholders at: https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p> <p>In accordance with the ASI Performance Standard, as well as the EHQS 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.</p>
2.2a-c Leadership	Conformance	The Chief Executive Officer (CEO) has corporate responsibility and authority to ensure conformance with the Performance Standard. Senior Management Representatives have been appointed to have overall responsibility and authority to ensure conformance with the ASI Performance Standard at the Entity level.
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 and the Certificate is available at: https://novelis.com/wp-content/uploads/2024/11/certificato-ISO14001-24032027-RINA.pdf

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented an Environmental Management System certified according to ISO 14001:2015. The Entity has implemented and fulfills the requirements of a Social Management System, which has been developed in alignment with ISO 26000. Compliance is ensured through regular verification and audits.
2.4a-e Responsible Sourcing	Conformance	The Entity's Supplier Code of Conduct has been developed in accordance with requirements of the ASI Performance Standard. Novelis has implemented a Responsible Sourcing Policy at a Group level, addressing ESG issues: https://novelis.com/wp-content/uploads/2025/02/Responsible-Sourcing-Policy.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as it does not have New Projects or Major Changes to existing Facilities.</p> <p>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. The Entity is located in a highly regulated country (Italy), 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.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as it does not have New Projects or Major Changes to existing Facilities.</p> <p>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. The Entity is located in a highly regulated country (Italy), 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.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has implemented an Emergency Response Plan. External stakeholders including the community and authorities are involved.</p> <p>Regular training is conducted with local fire fighters, the Community and Workers.</p>
2.8a-d Suspended Operations	Conformance	The Entity has implemented a Business Resilience Plan. All involved parties are trained, and evacuation or 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.
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 consider 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 the Entity's planning process. Closure, decommissioning and divestment is not managed on local level but by Corporate Headquarters. There were no closure, decommissioning and divestment plans at the Entity since joining ASI.

3. TRANSPARENCY

CRITERION	RATING	COMMENT
3.1a-b Sustainability Reporting	Conformance	The Entity is incorporated into the Novelis Group Sustainability Report. The Group has publicly disclosed its governance approach and its Material environmental, social and economic impacts in the Novelis Global Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity was not required to pay any fines, judgments, penalties nor received any non-monetary sanctions in the reporting period.
3.3a-c Payments to Governments	Conformance	The Entity complies with strict local legislation and has implemented Policies and procedures to conform to these requirements. To prevent Corruption, detailed behaviour expectations are described in the Novelis Code of Conduct that includes requirements where payments are made to authorities. All employees are trained on this Code of Conduct annually: 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 outside of Applicable Law 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*cZ3NDc3NDElNjgkbzEkZzAkDDE3NDc3NDElNjgkaJkbDAkADA
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 hotline' has been established (Novelis Ethics Hotline: 0800-180-7003) where complaints can be submitted by phone or online: https://app.convercent.com/en-US/LandingPage/918012dd-5b57-ee11-a9a3-000d3ab9f062?_u=1695920313532 The Entity's Whistleblower Policy is available at: https://www.novelis.com/wp-content/uploads/2025/02/Whistleblower-Policy.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has prepared Life Cycle Assessments (LCA) for its standard and specialty Products. In cooperation with an external service provider, life cycle evaluations are undertaken. The requirements of ISO 14040 are fulfilled.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity contributes life cycle inventory data to regional initiatives such as the Aluminium Association and European Aluminium Sustainable Development Indicators (SDI). 'Cradle-to-gate' LCA's are provided to customers for their Products upon request. Relevant data can be accessed via the European Aluminium SDI: https://european-aluminium.eu/our-work/standards-life-cycle-assessment
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
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	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	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.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity periodically monitors its Greenhouse Gas (GHG) emissions and energy use; GHG emissions are monitored by an independent party. The Entity's GHG emissions (Scope 1, Scope 2 and Scope 3) and energy use by source are publicly disclosed on an annual basis in the Novelis Sustainability Report:</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>The Entity's GHG emissions data were independently verified.</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity established initiatives and activities at each operational level to achieve the 2050 goal of carbon neutrality established in their Decarbonisation Strategy. Activities to reduce GHG emissions have been planned and actioned for several years. The reduction initiative results are tracked and reported in the annual Sustainability Report (pages 14 – 16). Detailed information is available in the Novelis Global Sustainability Report:</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>The Entity has used the ASI GHG Emissions Reduction Pathway methodology to develop emissions reduction pathways:</p> <p>https://www.novelis.com/wp-content/uploads/2025/02/ASI-Decarbonization-Pathway.pdf</p>

CRITERION	RATING	COMMENT
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has outlined and established initiatives and activities at each operational level to achieve the 2050 goal of carbon neutrality established in their Decarbonisation Strategy. Activities to reduce GHG emissions have been planned and actioned for several years. The reduction initiative results are tracked and reported in the annual Sustainability Report (pages 14 - 16). Detailed information is available in the Novelis Global Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>The Entity has used the ASI GHG Emissions Reduction Pathway methodology to develop emissions reduction pathways: https://www.novelis.com/wp-content/uploads/2025/02/ASI-Decarbonization-Pathway.pdf</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has implemented an ISO 50001 Certified Management System. Projects to reduce energy consumption are being implemented in an ongoing approach, and the effects of GHG emissions reduction initiatives are calculated over time.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Emissions to Air are controlled according to local regulations and permits, and applicable limits are met. The emissions are monitored, controlled and reduced constantly. Emissions to Air Data are made available in the Sustainability Report at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>Discharges to Water that have adverse effects on humans and the environment are controlled under Italian law, reported and in accordance with the operational permit of the Entity. Regular routine water assessments are undertaken by an external provider.</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has undertaken risk assessments and implemented measures to prevent and detect contamination of air, water and soil. Regular internal audits are conducted to verify the effectiveness of measures taken and adherence to defined actions. Emergency procedures for major risk areas have been introduced.</p> <p>The Entity has undertaken risk assessments and implemented prevention measures relevant to Material Leakages and Spills. Relevant Spills and Leakages are reported to the relevant local Authority.</p>
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The identification and reporting processes for Spills are regulated, trained and tested across the Entity. There have been no reportable Spills at the plant since the Environmental Management System was implemented in 1999.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste Management Strategy. The Waste management goals prescribed in the Strategy 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 Entity has publicly disclosed the quantities of Hazardous and Non-Hazardous Waste generated and the associated waste disposal</p>

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		methods in the Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
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	The Entity produces 'black Dross' and 'white Dross'. 100 percent of the white Dross is recycled internally. Black Dross is treated with argon and then cooled to stop the oxidation process. It is then sent to external local contractors, where the black Dross is treated. The Aluminium portion of the Black Dross is returned as Aluminium bar, and the non-Aluminium residuals are further treated at a second contractor facility.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity monitors water usage in accordance with 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 Material water-related risks detected. Water data are made available via the Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
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		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted an Environmental Risk Assessment as part of its 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 in future, 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. If required in future, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed. Currently, there are no open measures.
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 in future, 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 preventive action to prevent the introduction of Alien Species. Packaging material used for export materials such as

CRITERION	RATING	COMMENT
		wooden pallets and NIMP15 are thermally treated to eliminate the risk of Alien Species being introduced to other regions.
8.5a-b Commitment to “No Go” in World Heritage Properties	Not Applicable	The Entity has identified there are no Protected Areas within their Area of Influence.
8.6a-d Protected Areas	Not Applicable	The Entity has identified there are no Protected Areas within their 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 Novelis Group publicly subscribes to the United Nations Guiding Principles (UNGP) and has issued and communicated its Code of Conduct and a commitment to respecting Human Rights. The Code of Conduct is available at: https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p> <p>The Entity's commitment to the Principles of the United Nations Global Compact on Human Rights, Labour, Environment and Anti-Corruption is available at: https://ungc-production.s3.us-west-2.amazonaws.com/attachments/Organization/129081/original/Novelis_Inc._-Letter_of_Recommitment.pdf?1542995069</p> <p>The Entity has conducted a risk assessment that examined potential Human Rights impacts within its Area of Influence of the Entity were examined. The assessment did not identify any issues that have caused or contributed to adverse Human Rights impacts.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>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 made available in the Sustainability Report: 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 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 is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.

CRITERION	RATING	COMMENT
9.4b Free, Prior, and Informed Consent (FPIC) – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples where the Entity operates.
9.4c Free, Prior, and Informed Consent (FPIC) – Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites or values are present within the Entity's Area of Influence. Furthermore, Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage – Identification	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.
9.5b Cultural and Sacred Heritage – Impacts	Not Applicable	This Criterion is not applicable to the Entity, as 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 is not applicable to the Entity, as there is no planned expansion which may have an impact.
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity does not use any resources that could lead to a lack of resources in the area for use amongst the local 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 interested parties has been undertaken. Further information is available in the Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>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.</p>
9.8a Conflict-Affected and High-Risk Areas – Strong management systems	Conformance	<p>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</p>
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. The use of specific 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 which 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, or on an 'ad hoc' basis.

CRITERION	RATING	COMMENT
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.
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 itself 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 Workers' rights and applies a Collective Bargaining Agreement for the metallurgy sector. All Workers are free to join local Union organisations. No infringements to this requirement have been reported.
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 the Entity operates in Italy, which fully respects Workers' rights.
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, nor supports any form 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 supports 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: 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 implements to identify, prevent and address Modern Slavery and Human Trafficking 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	The Entity ensures equal opportunities and does not engage in, nor supports Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker based on gender, race, national or social origin, religion, disability, political

CRITERION	RATING	COMMENT
		affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. Positions are classified and are incorporated into the Collective Bargaining Agreement. This was confirmed during the Audit via interviews and document review.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or Harassment.
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 during the Audit via interviews with the Works Council and document review. All employees attend culture workshops.</p> <p>The Entity's Policy Against Harassment is available at: 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. Working Time, payment and leave are negotiated in the Collective Bargaining Agreement. The wages paid are substantially above the legal minimum. The Entity's wage payments are timely, in legal tender and are fully documented.
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 incorporated in 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 certified to ISO 45001. Any identified non-conformances are being actioned by the Entity. The Entity's Safety Management System is well implemented and internal and external audits are conducted to confirm effectiveness of the system. The Entity's ISO 45001 Certificate is valid and covers the full Entity's ASI Certification Scope: https://novelis.com/wp-content/uploads/2024/11/certificato-ISO45001-29032027-RINA.pdf
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	The Entity has implemented an OH&S Management System that is ISO 45001 Certified. Lagging Indicators are disclosed in the Sustainability Report:

CRITERION	RATING	COMMENT
		https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf 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 available at: https://www.novelis.com/wp-content/uploads/2025/02/OHS-leading-indicators.pdf
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 March 2021	Initial Certification Audit – Provisional Certification
1	19 April 2022	Surveillance Audit – Full Certification
2	31 July 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI PS V3.1.