

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis Sheet Ingot GmbH

CERTIFICATE NUMBER
109

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
SZI GmbH

DATE OF ISSUE
5 JANUARY 2024

DATE OF EXPIRY
4 JANUARY 2027

CERTIFIED SINCE
5 JANUARY 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', followed by a long horizontal line.

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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 Nachterstedt
Recycling (Germany) site to
produce Aluminium products
including shredding, de-coating,
melting and casting.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Sheet Ingot GmbH
CERTIFICATION SCOPE	All activities on the Nachterstedt Recycling (Germany) site to produce Aluminium products including shredding, de-coating, melting and casting.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (30 January – 8 May 2020)Surveillance Audit (5 – 6 April 2022)Re-Certification and Scope Change Audit (25 – 26 September 2023)Surveillance Audit (3 – 5 June 2025)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">30 January – 8 May 2020 (Initial Certification Audit)5 – 6 April 2022 (Surveillance Audit)26 – 27 September 2023 (Re-Certification and Scope Change Audit)3 – 5 June 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">10 December 2020 (Initial Certification Audit)24 March 2023 (Surveillance Audit)30 December 2023 (Re-Certification and Scope Change Audit)4 August 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (30 January – 8 May 2020)</u></p> <p>The Audit Scope includes all processes applied in Nachterstedt Recycling facility.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (5 – 6 April 2022)</u></p> <p>The Audit Scope covers all processes applied in Nachterstedt Recycling facility.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses

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

Re-Certification and Scope Change Audit (26-27 September 2023)

The Audit Scope covers all processes applied in Nachterstedt Recycling facility.

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.

Surveillance Audit (3 – 5 June 2025)

The Audit Scope covers all processes applied in Nachterstedt Recycling facility.

Supply chain activities included in the Audit Scope:

- Aluminium Re-melting/Refining
- Casthouses

Relevant Criteria and Criteria that were identified as non-conformities from the previous Audit 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

5 January 2024 – 4 January 2027

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

4 January 2027

CERTIFICATE NUMBER

109



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 plant (the 'Entity') in Nachterstedt consists of a rolling mill and a recycling centre, the latter of which was built in 2014. The plant covers 45,900m² on a total site footprint of 60,000m² and currently employs 226 people. It supplies semi-finished products (Aluminium ingots) to be further manufactured by Novelis into high-quality rolled aluminium products for automotive, can, industrial and construction markets worldwide. The recycling centre is dedicated to recycling used beverage cans and other scrap Aluminium. The Aluminium recycling plant can produce up to 400,000 tonnes of Aluminium sheet ingots from recycled material.

The Recycling site operates an end-to-end process (shredding, sorting, melting and casting) with a feedstock from up to 18 different scrap types across all market segments. On-site technology utilises regenerative burners for the melting furnaces and some electrical energy is generated by an Organic Rankine Cycle (ORC) that creates heating for the building from useable-waste heat. Logistics solutions consist of a highly efficient reloading trailer park system for incoming goods and a full train-based system for outbound transport.

Situated in a largely rural area, Novelis Nachterstedt is actively involved in local activities in cooperation with schools and universities to promote interest in science and technology. The Entity offers internships in all departments and supports students with their university theses or college projects. The Entity is also known for its ongoing support of safety education provided for children at kindergarten provided by the local fire department.

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 implemented a thorough process to constantly maintain awareness of and ensure Compliance with the latest Applicable Law. A cadastre (Kataster) of the Applicable Law is available, and up to date and relevant personnel have received training.
1.2 Anti-Corruption	Conformance	Anti-Corruption is regulated at the Entity and Novelis Group specifications are implemented at all business levels, with training provided.
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Code of Conduct, including environmental, social and governance performance principles. 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>The Entity also has implemented a Supplier Code of Conduct, which suppliers must sign, before delivering their goods and services to Novelis and 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, Safety and Quality (EHSQ) Policy is communicated both internally and externally. Internal communication is ensured through annual training and informational announcements. It is available to externally via the Novelis webpage: 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 EHSQ Policy, the Entity has senior management endorsement and support through the provision of resources and regularly reviews the Policies. The Entity has obtained IATF 16949, ISO 14001, ISO 9001, ISO 50001 and ISO 45001 certifications, which are consistent with the ASI Certification Scope.</p> <p>The Novelis EHSQ Policy is continuously communicated both internally and externally. Internal communication is ensured through annual training and informational announcements.</p>
2.2a-c Leadership	Conformance	The Novelis CEO has corporate responsibility and authority to ensure conformance with the ASI Performance Standard. A Management Representative has been nominated at the Entity level, having overall responsibility and authority for ensuring conformance with the Standard.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Integrated Management System according to ISO 9001, ISO 45001, ISO 14001, IATF 16949 and ISO 50001 Standards.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has documented an Environmental Management System that has been certified according to ISO 14001:2015. Furthermore, the Entity has assessed their Management System towards social aspects.

CRITERION	RATING	COMMENT
		Internal social (according to ISO 26000) and compliance audits are undertaken regularly.
2.4a-e Responsible Sourcing	Conformance	The Entity's Supplier Code of Conduct has been developed in accordance with the requirements of the ASI Performance Standard. Novelis has implemented a Responsible Sourcing Policy at the Group level, addressing environmental, social and governance 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 no New Projects or Major Changes to existing Facilities have taken place since the Entity joined ASI.</p> <p>As part of the internal risk assessments, influencing factors such as environment, social, and Human Rights are recorded and evaluated in the context of New Projects and system changes. 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) and the Entity has established systems to manage this effectively.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as no New Projects or Major Changes to existing Facilities have taken place since the Entity joined ASI.</p> <p>As part of the internal risk assessments, influencing factors such as environment, social, and Human Rights are recorded and evaluated in the context of New Projects and system changes. 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) and the Entity has systems in place to manage this effectively.</p>
2.7a-f Emergency Response Plan	Conformance	The Entity has an implemented and trained Emergency Response Plan. External Stakeholders including the community and authority are involved. The plan is regularly reviewed internally and externally by the Community and authorities Regular training sessions are held with the local firefighters, the Community and Workers.
2.8a-d Suspended Operations	Conformance	The Entity has implemented a Business Resilience Plan. All relevant parties have received training and exercises like evacuation or fire drills are conducted frequently. A software application has been introduced to support responsible persons in case of an emergency, breakdown, fire or accident with all necessary documents and contact information.
2.9a-b Mergers and Acquisitions	Conformance	Acquisitions and mergers are executed and managed by Novelis Headquarters accompanied by a Due Diligence process which is supported by external specialists to reflect environmental, social and governance issues.
2.10a-b Closure, Decommissioning and Divestment	Conformance	Closure, decommissioning and divestment processes are managed by Novelis Headquarters rather than the local level. The Entity however systematically reviews environmental, social, and governance issues as part of its planning process. Closure, decommissioning and

CRITERION	RATING	COMMENT
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has prepared Life Cycle Assessments (LCA) for all Product groups consistent with the requirements of ISO 14040. Novelis can create LCAs independently are issued to customers upon request.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity contributes Life Cycle Inventory (LCI) data to regional initiatives including the Aluminum Association and European Aluminium Sustainable Development Indicators. LCAs include underlying assumptions and system boundaries, which are 'cradle-to-gate' and are delivered to customers for their Products upon request. LCAs are available for the relevant Products as well as for a standard product. 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.
4.3a-b Aluminium Process Scrap	Conformance	The Entity has implemented a working scrap management process. Aluminium Process Scrap is reduced to a minimum, if scrap is generated it will be 100% recycled or reused. The Entity has a closed-loop production, and 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	The Entity has developed and implemented an Aluminium Recycling Strategy. The established goals are fulfilled and thus a continuous increase in the recycling rate is achieved. The Entity is actively engaged in European initiatives or groups that support and improve national collection rates (e.g., Duales System Deutschland). For more information, refer to: https://investors.novelis.com/news-events/press-releases/detail/1366/novelis-and-tsr-strategic-partnership-to-advance-circularity-in-the-aluminum-industry
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	Data relating to environment, health and safety including energy consumption, emissions, waste data and water consumption are presented in working areas ('shop floor'). The Entity has disclosed detailed Greenhouse Gases (GHG) emissions information and which is available in the 2024 Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf GHG emissions data were independently verified by PricewaterhouseCoopers (PWC).
5.2a Aluminium Smelter GHG Emissions Intensity -	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
Started production after 2020		
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	The Entity has outlined and established the initiatives and activities to achieve a 2050 goal of carbon neutrality in its Decarbonisation Strategy. Activities to reduce GHG emissions have been targeted, planned and ongoing for several years. Results are tracked and published annually, detailed information is presented in the Novelis Global Sustainability Report: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has outlined and established initiatives and activities within each level to achieve the 2050 goal of carbon neutrality in their Decarbonisation Strategy. Activities to reduce GHG emissions have been targeted and planned for several years. The results are tracked and disclosed in the 2024 Sustainability Report and the 'Green Bond Framework':</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> <p>The GHG Emissions Reduction Pathway with Intermediate Targets is publicly disclosed at:</p> <p>https://www.novelis.com/wp-content/uploads/2025/02/ASI-Decarbonization-Pathway.pdf</p> <p>Different projects have been developed which include activities to reduce GHG emissions, which will be monitored by various Stakeholders at plant and regional levels. Targets and responsibilities are established at different levels.</p>
5.4 GHG Emissions Management	Conformance	The Entity has implemented an ISO 50001-certified Management System with supporting projects to reduce energy consumption are ongoing and the effects of GHG emissions reduction are calculated
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Emissions to Air are managed under strong control according to local regulations and permits and limits are met. Emissions are monitored, controlled and reduced constantly. Projects to reduce emissions are planned are tracked at both the plant and regional levels.</p> <p>Emissions to Air data are disclosed via 2024 Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
6.2a-g Discharges to Water	Conformance	Discharges to Water that may have adverse effects on humans and the environment, and contamination of water must be reported to the authority (Lower Water Authority) in accordance with the Water Resources Act and permits without delay. Routine water checks are carried out.

CRITERION	RATING	COMMENT
		Discharges to Water that have adverse effects on humans and the environment are under German law and in line with the operational permit of the Nachterstedt plant. Discharges to water and the risk of discharge to soil are subject to the environmental goals published in the report of the Emission Protection Officer (EHS Manager).
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. Additionally, regular internal audits are conducted to verify 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 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 and tested and there are regular visits by the district Government. There have been no reportable Spills inside or outside the plant since ISO 14001 was implemented in 2014. Documentation of regular visits made by the district Government is available.
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste management strategy. Waste management goals have been achieved, and a reduction of the Waste streams has been identified. The Entity's Waste Management Strategy has been completed in accordance with the Waste Mitigation Hierarchy.</p> <p>The quantities of Hazardous and Non-Hazardous Waste generated by the Entity and associated Waste disposal methods are disclosed in the 2024 Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>These data are also available via Thru.de, an internet portal that is managed by the German Federal Environment Agency: https://ptr.thru.de/details/300954/karte</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	100% of white Dross is gathered and recycled internally. After treating black Dross with argon and cooling down to stop the oxidation process it is sent to an external local Contractor who treats the Dross and sends it back as liquid Aluminium.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity monitors its water usage according to local regulations. An overview of water inputs, the various consumers and the different wastewater flows are described and regularly reviewed. Water usage by source and type is publicly disclosed in the 2024 Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>The Entity has assessed its water-related risks and implemented</p>

CRITERION	RATING	COMMENT
		prevention measures accordingly throughout its Area of Influence. There are no Material water-related risks identified.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as water-related risks are identified as low. The Entity has implemented targets for its water management. These targets are regularly reviewed during authority visits as well as during the annual Environmental Management System review.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted an environmental risk assessment including an assessment of biodiversity impacts which covers the entire Entity's Area of Influence. No risks are identified.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as there are no Material biodiversity impacts identified in the risk assessment. If required, biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, 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.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, 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.
8.4 Alien Species	Conformance	The Entity has taken implemented actions 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, there are no World Heritage sites in the operating environment of the Entity.
8.6a-d Protected Areas	Not Applicable	The Entity has identified there are no protected areas within the Area of Influence according to the State Administration Office website.
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	The Entity has implemented a Code of Conduct and several gender-responsive Policies with a commitment to respect Human Rights. As part of a risk assessment, the requirements of Human Rights within the Area of Influence of the Entity were assessed. The Entity has not identified any issues that have caused or contributed to adverse

CRITERION	RATING	COMMENT
		Human Rights impacts. The Entity has published a Letter of Commitment to the UN Global Compact, available at: 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 implemented Policies and tools to ensure women's rights are respected at all times. The People Respecting Our Unique Diversity (PROUD) initiative has been introduced and published. All initiatives and results are available in the 2024 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 present or 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 present or 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 does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or 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 no sacred or cultural heritage sites or values within the Entity's Area of Influence are present. Indigenous Peoples or their lands, territories and resources are not present or 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 within the Entity's Area of Influence are present. Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion does not apply to the Entity, as no further expansion of the Entity is planned. No resettlements are being considered nor taking place during the period since joining ASI or are expected to occur during the Certification Period.
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 very sensitive to the local neighbourhood, the Community and all other interest groups in the vicinity of where the Entity operates. An evaluation of the interested parties has been undertaken which confirmed that there are no risks or any negative or Material impacts identified. Refer to: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf The Entity adheres to the Novelis Group requirement to respect and

CRITERION	RATING	COMMENT
		<p>support the livelihoods of Local Communities. The Entity actively participates in numerous social activities with the Local Communities. Refer to:</p> <p>https://investors.novelis.com/sec-filings/all-sec-filings/content/0001304280-24-000024/nvl-20240331.htm#ie29d0475f52046eab13011b74aa69d9e_208</p>
9.8a Conflict-Affected and High-Risk Areas – Strong Management Systems	Conformance	<p>The Entity has implemented strict procedures to ensure it does not contribute in any way to Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has introduced Management Systems that are audited annually by an external certification body, also internal audits are conducted. To become a Novelis supplier, the supplier must accept the Supplier Code of Conduct and confirm that it complies with the rules as prescribed. Through the Supplier Code of Conduct, the Entity undertakes supplier audits or inspections, and requests self-assessments to ensure supplier compliance.</p> <p>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	<p>The Entity monitors its suppliers through different topics within the Supplier Code of Conduct. These are rated and assigned one total risk number. The calculated risk number informs the Entity whether they must react or not. Suppliers can be blocked if necessary.</p>
9.8c Conflict-Affected and High-Risk Areas – Strategy to respond to risks	Conformance	<p>The Supplier Code of Conduct allows the Entity to conduct audits or inspections, they also request self-assessments to ensure supplier compliance. The Entity monitors its suppliers with information provided to the supplier in an annual supplier evaluation. Risks are recognised at an early stage, allowing the Entity to react on an 'as needs' basis.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>The Entity has implemented procedures to ensure it does not contribute in any way to Human Rights abuses in Conflict-Affected and High-Risk Areas and internal audits are conducted to confirm the effectiveness of due diligence practices.</p>
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>Annual management reporting of responsible sourcing activities is available in the 2024 Sustainability Report:</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
9.9 Security practice	Conformance	<p>The Entity has implemented security practices that respect Human Rights. The Entity performs most security functions however also contracts an external security provider for gate control and plant security. The Entity does not employ armed security forces.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Entity respects the local regulations on Workers' rights and has implemented the collective agreement for the metallurgy sector. Most Workers have joined a trade union and there is an elected Workers' Council. No infringement on Freedom of Association and Right to Collective Bargaining has ever been reported.</p>

CRITERION	RATING	COMMENT
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable, as the Entity operates in Germany where the rights of Workers are fully respected and the Entity respects Freedom of Association without interference.
10.2a Child Labour	Conformance	The Entity has implemented Policies and follows local regulations to avoid the hiring of Child Labour. The Entity has strict control over any potential Child Labour, Young Workers are employed for vocational education purposes only and if at all, work with Hazardous substances only occurs under supervision. The Entity does neither use nor support the use of Child Labour and 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 supports Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and document review.</p> <p>Novelis has disclosed a stand-alone Policy for Human Rights and Forced Labour: https://www.novelis.com/wp-content/uploads/2025/02/Human-Rights-Policy.pdf</p> <p>A stand-alone annual statement disclosing how the Entity identifies, prevents 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 has established Policies and internal standards that ensure equal opportunity and prohibit any form of discrimination in the recruitment process, salary, promotion, training, advancement opportunities, or termination of any Worker. Discrimination on the basis of 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 is strictly prohibited. This has been confirmed through interviews and document review.
10.5 Communication and engagement	Conformance	The Entity has established a Code of Conduct, as well as several independent procedures for resolving complaints. It has been verified through interviews and document review that the Entity ensures open channels of communication and engages directly with Workers and their representatives to address workplace and compensation issues without fear of retaliation, intimidation, or harassment.
10.6a-g Violence and Harassment	Conformance	The Entity has developed standards in collaboration with the Works Council that set out 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 through interviews with the Worker council and document review. All employees attend culture workshops.

CRITERION	RATING	COMMENT
		The Policy Against Harassment is available at: https://www.novelis.com/wp-content/uploads/2025/02/Policy-Against-Harassment.pdf
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 Collective Bargaining agreements. The wages paid are substantially above the legal minimum and are aligned with the industry standard. As verified by document review and interviews during the assessment, the Entity's wage payments are timely, in legal tender and 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 part of the Collective Bargaining agreements and part of each employment contract. A clocking-in system has been implemented, and records are maintained.
10.9a-b Informing Workers of Rights	Conformance	The Entity's employees are informed via various media channels and are invited to open meetings by the Works Council for regular updates. Additionally, there is a complaint management system which is available for all Workers.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented a Health and Safety Management System (OH&S), which is certified to ISO 45001. Internal and external audits are conducted to confirm the effectiveness of the system, and any identified non-conformances are actioned. The certificate is available at: https://novelis.com/wp-content/uploads/2024/11/SZ-A-1620-A-Zertifikat-45001-Novelis-Deutschland-2025-05-eng.pdf
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 and is operating effectively. The Novelis Safety Management System is well implemented.</p> <p>OH&S lagging Indicators are disclosed in 2024 Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf and leading Indicators are available at: https://www.novelis.com/wp-content/uploads/2025/02/OHS-leading-indicators.pdf</p> <p>A comparative analyses of performance with peer Businesses and leading practice is only possible with internal peer businesses (because of available data), and disclosed via: https://www.novelis.com/wp-content/uploads/2025/02/OHS-leading-indicators.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity's employees are involved in the preparation of risk assessments and Safety Officers attend OH&S Committee meetings held quarterly. Accidents are reported both internally and externally to relevant parties. Safety Representatives have been allocated in all departments and are appropriately trained and participate in safety tasks.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	5 January 2021	Initial Certification Audit – Full Certification
1	26 April 2023	Surveillance Audit
2	5 January 2024	Re-Certification and Scope Change Audit from Performance Standard V2 to V3.
3	8 September 2025	Surveillance Audit