

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis Deutschland GmbH Werk Ohle

CERTIFICATE NUMBER

50

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

SZI GMBH

DATE OF ISSUE

25 NOVEMBER 2025

DATE OF EXPIRY

24 NOVEMBER 2028

CERTIFIED SINCE

25 NOVEMBER 2019

AUTHORISED BY

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

CERTIFICATION SCOPE

All activities at the Novelis Ohle plant in Germany to produce Aluminium products including cold mill, semi-finished products, packaging products and flexible tubes.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

Validity of this Certificate is subject to continued conformance with the applicable ASI Standard and can be verified at
www.aluminium-stewardship.org

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Deutschland GmbH Werk Ohle
CERTIFICATION SCOPE	All activities at the Novelis Ohle plant in Germany to produce Aluminium products including cold mill, semi-finished products, packaging products and flexible tubes.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (29 May and 7 – 8 August 2019)Re-Certification Audit (28 April 2022)Surveillance Audit (24 – 25 April 2024)Re-Certification Audit and Scope Change (13 – 14 October 2025)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">29 May 2019 and 7 – 8 August 2019 (Initial Certification Audit)27 – 28 April 2022 (Re-Certification Audit)24 – 25 April 2024 (Surveillance Audit)13 – 14 October 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">21 September 2019 (Initial Certification Audit)25 November 2022 (Re-Certification Audit)14 October 2024 (Surveillance Audit)20 November 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (29 May 2019 and 7 – 8 August 2019)</u></p> <p>Cold mill semi-finished products, packaging products and flexible tubes manufactured at the Novelis Ohle plant (Germany).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Re-Certification Audit (27 – 28 April 2022)</u></p> <p>Cold mill semi-finished products, packaging products and flexible tubes manufactured at the Novelis Ohle plant (Germany).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Semi-Fabrication <p>All relevant criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit (24 – 25 April 2024)

Cold mill semi-finished products, packaging products and flexible tubes manufactured at the Novelis Ohle plant (Germany).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication

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

Re-Certification Audit and Scope Change (13 – 14 October 2025)

The Audit Scope included the cold mill semi-finished products, packaging products and flexible tubes manufactured at the Novelis Ohle plant (Germany).

Supply chain activities included in the Audit Scope:

- Semi-Fabrication

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

AUDIT OUTCOME	Certification
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AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD	25 November 2025 – 24 November 2028
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DATE	24 May 2027
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CERTIFICATE NUMBER	50
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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' Plettenberg-Ohle, Germany, is specialized in cold rolling and subsequent processes to serve customers worldwide in the packaging industry, the cable industry, the food industry (OHLER® Packaging Systems) and the automotive and caravan industry (OHLER® Flexible Tubes). Expertises are batch and continuous annealing, slitting, lubrication, extrusion coating, deep drawing and the production of flexible tubes and hoses.

MATURITY RATINGS

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

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

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the ASI Performance Standard's legal compliance requirements. Systems have been implemented 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 supports the Entity with legal counsel.
1.2 Anti-Corruption	Conformance	<p>The Entity works against Corruption in all its forms, consistent with Applicable Law and prevailing international standards. A Code of Conduct is issued and communicated internally and externally. The Entity has provided training to employees on business ethics. Corporate Headquarters operates a 'whistleblowing' hotline where potential breaches or suspected Corruption can be reported confidentially.</p> <p>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>
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 can be accessed via: 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 have to sign and return: 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. External communications are facilitated via the Novelis webpage: https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf</p> <p>The Entity has senior management endorsement and support through the provision of resources and regularly reviews the Policies. The Entity obtained 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 group has been nominated for having responsibility at the Entity level.
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Environmental Management System which is certified to ISO 14001 by an accredited certification body: https://novelis.com/wp-content/uploads/2020/12/EHS-Policy-Guidelines_ENG.pdf

CRITERION	RATING	COMMENT
		content/uploads/2024/11/SZI-U-1620-A-Zertifikat-14001-Novelis-Deutschland-2025-05-eng.pdf
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established an Environmental Management System and has implemented and fulfils the requirements of a Social Management System, consistent to the requirements of ISO 26000. Compliance is regularly audited.
2.4a-e Responsible Sourcing	Conformance	The Entity's Supplier Code of Conduct is available at: https://novelis.com/download/novelis-supplier-code-of-conduct/ Novelis has implemented a Responsible Sourcing Policy at a Group level, addressing environmental, social and governance issues, available at: https://novelis.com/wp-content/uploads/2025/02/Responsible-Sourcing-Policy.pdf
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have occurred since the Entity joined ASI. The site is located in a highly regulated country (Germany), where relevant projects and changes (linked to construction activities) undergo a thorough analysis and authorisation process and the Entity has implemented systems to manage this. As part of the internal risk assessments, the influencing factors such as environment, social and Human Rights are recorded and evaluated in the context of New Projects and system changes.
2.6a-h Human Rights Impact Assessment	Not Applicable	This Criterion is not applicable to the Entity, as no New Projects or Major Changes have occurred since the Entity joined ASI. The site is located in a highly regulated country (Germany), where relevant projects and changes (linked to construction activities) undergo a thorough analysis and authorisation process and the Entity has implemented systems to manage this. As part of the internal risk assessments, the influencing factors such as environment, social and Human Rights are recorded and evaluated in the context of New Projects and system changes.
2.7a-f Emergency Response Plan	Conformance	The Entity has a well implemented and trained Emergency Response Plan. External Stakeholders including the Community and authorities are involved with its implementation. Regular training with the local fire brigade, the Community and Workers is undertaken. The emergency response plan is publicly disclosed in both gatehouses. Because of security issues (such as camera locations and names) it is not published via the Entity's webpage.
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 undertaken frequently.
2.9a-b Mergers and Acquisitions	Conformance	Acquisitions executed by Novelis Headquarters are accompanied by a Due Diligence process and supported by external specialists to reflect environmental, social and governance issues.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity systematically reviews environmental, social, and governance issues as part of its planning process. Closure, decommissioning and divestment are managed by Corporate

CRITERION	RATING	COMMENT
		Headquarters and not at a local level. There have been no closure, decommissioning or divestment plans for the Entity since joining ASI.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity is part of Novelis Group's Sustainability Reporting. The Group publicly disclosed its governance approach and its Material environmental, social and economic impacts in the 2025 Sustainability Report:</p> <p>https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf</p>
3.2 Non-compliance and Liabilities	Conformance	<p>Entity-specific information on significant fines, judgments, penalties and non-monetary sanctions are published by the district government (Bezirksregierung Arnsberg). Public access is ensured via the EU Directive 2003/4/EC executed as the <i>Environmental Information Act (UIG)</i>. Further information is available at:</p> <p>https://www.bra.nrw.de/umwelt-gesundheit-arbeitsschutz/umwelt/immissionsschutz-luft-laerm-gerueche/umweltueberwachungsplan-und-programme-vor-ort-besichtigungen/umweltinspektionsberichte-maerkischer-kreis</p>
3.3a-c Payments to Governments	Conformance	<p>The Entity complies with the strict local legislation and has implemented Policies and procedures to conform to the requirements. To prevent Corruption, detailed behaviour expectations are described in the Novelis Code of Conduct, which includes requirements where payments are made to authorities. Every employee is trained on the Code annually. The Code of Conduct is available at:</p> <p>https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p> <p>Payments to Governments are not allowed. This is disclosed in Form 10-K Annual Report, section 13:</p> <p>https://investors.novelis.com/sec-filings/all-sec-filings/content/0001304280-25-000023/0001304280-25-000023.pdf?_gl=1*13yxrgg*_up*MQ.*_ga*MjEzMtkwMDE3LjE3NDc3NDElNjk.*_ga_6QYKVB7VNN*cZE3NDc3NDElNjgkbzEKZzAkDDE3NDc3NDElNjgkaJkbDAKaDA</p>
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	<p>The Entity is certified against ISO 9001, ISO 14001, ISO 50001 and ISO 45001 and has implemented a process for claim handling. A 'whistleblowing' hotline has been established and is available at:</p> <p>https://app.convercent.com/en-US/LandingPage/918012dd-5b57-eel1-a9a3-000d3ab9f062?_=1695920313532</p> <p>The Novelis Whistleblower Policy is disclosed at:</p> <p>https://novelis.com/wp-content/uploads/2025/02/Whistleblower-Policy.pdf</p>
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	<p>Novelis has prepared Life Cycle Assessments (LCA's) for its main Product groups. In cooperation with an external service provider, life cycle evaluations are undertaken. Following a customer request, data are sent to the provider and a new Product-related LCA is created and sent to the Entity's customer. The Entity's LCA approach is consistent to the requirements of ISO 14040.</p>

CRITERION	RATING	COMMENT
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity contributes life cycle inventory data to regional initiatives e.g. Aluminium Association and European Aluminium Sustainable Development Indicators (SDI): https://www.european-aluminium.eu</p> <p>'Cradle-to-gate' LCA's are provided to customers for their Products upon request. LCA's are available for the relevant Products. Relevant data can be accessed via the European Aluminium SDI: https://european-aluminium.eu/our-work/standards-life-cycle-assessment/</p>
4.2 Product Design	Not Applicable	This Criterion is not applicable to the Entity, as it does not carry out any design development. The design and material composition are always owned by the customer. The Entity produces the profiles according to customer specifications.
4.3a-b Aluminium Process Scrap	Conformance	<p>The Entity has implemented a working Scrap management procedure. Aluminium Process Scrap is reduced to a minimum, and if Scrap is generated, it is 100% recycled or reused.</p> <p>There is 'closed-loop' production in place. Aluminium alloys and grades are recorded separately and recycled according to type.</p>
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. Duale System Deutschland).
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity is part of the International Greenhouse Gas Trading framework. Data including energy consumption, emissions, waste numbers, and water consumption are visible in working areas ('shopfloor').</p> <p>The energy use by source on an annual basis is publicly disclosed in the Novelis 2025 Sustainability Report: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf</p> <p>Emissions are 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.

CRITERION	RATING	COMMENT
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has undertaken environmental operational activities to reduce energy consumption and GHG Emissions, established reduction targets, installed meters and implemented action plans. Reduction targets are established at regional and plant levels and GHG emissions reduction targets and Key Performance Indicators (KPI's) are provided in the annual Sustainability Report and Green Bond Framework, available at: https://novelis.com/sustainability/2025-sustainability-report/ https://creative.novelis.com/m/33ac10cbf310b3d0/Novelis-Green-Bond-Report-2024.pdf</p> <p>The Group-wide GHG Emissions Reduction Pathway, which uses a 2023 baseline year, was developed in accordance with the ASI methodology and is public disclosed at: https://www.novelis.com/wp-content/uploads/2025/02/ASI-Decarbonization-Pathway.pdf</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has undertaken environmental operational activities to reduce energy consumption and GHG Emissions, established reduction targets, installed meters and implemented action plans. Reduction targets are established at regional and plant levels and GHG emissions reduction targets and Key Performance Indicators (KPI's) are provided in the annual Sustainability Report and Green Bond Framework, available at: https://novelis.com/sustainability/2025-sustainability-report/ https://creative.novelis.com/m/33ac10cbf310b3d0/Novelis-Green-Bond-Report-2024.pdf</p> <p>The Group-wide GHG Emissions Reduction Pathway, which uses a 2023 baseline year, was developed in accordance with the ASI methodology, including intermediate targets and is public disclosed at https://www.novelis.com/wp-content/uploads/2025/02/ASI-Decarbonization-Pathway.pdf</p>
5.4 GHG Emissions Management	Conformance	<p>The Entity has established and implemented an ISO 14001 and ISO 5001 certified Management System, which is audited annually. Projects to reduce GHG emissions are described and implemented, and projects are tracked on both a plant and regional level.</p>
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Emissions to Air that have adverse effects on humans and the environment are controlled according to German law and reported in accordance with the Entity's operating permit. Emissions are controlled and reduced constantly. Emissions are disclosed in the Novelis 2025 Sustainability Report: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.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 German law and reported in accordance with the Entity's operating permit. Data are disclosed in the Novelis 2025 Sustainability Report: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf</p>

CRITERION	RATING	COMMENT
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has performed risk assessments and implemented prevention measures for Material Spills and Leakages. Relevant Spills are reported to the Authority and by the Authority to all other relevant public parties (if necessary).
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The reporting of Spills is regulated, trained and tested. There have been no reportable Spills inside/outside the plant since ISO 14001 was implemented in 2014.</p> <p>Further information is available at: https://www.bra.nrw.de/system/files/media/document/file/novelis-deutschland-gmbh-kaltwalzwerk-plettenberg-21.06.2023.pdf</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste management strategy that is in accordance with the Waste Mitigation Hierarchy. The goals in the field of Waste management are fulfilled and there has been a reduction in Waste streams.</p> <p>The Authority may, if necessary, request the report of the Waste Officer. Upon request, the quantities of Hazardous and Non-Hazardous Waste are made available to the public. Regular monitoring by the district government verifies compliance with legal requirements: https://www.bra.nrw.de/suche?volltext=novelis</p> <p>All quantities of Hazardous and Non-Hazardous Waste generated by the Entity and associated Waste disposal methods are publicly disclosed, available in the Novelis 2025 Sustainability Report: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf</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	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
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 the water inflows, consumption points and wastewater flows is described and regularly reviewed.</p> <p>The Entity has assessed its water-related risks and implemented prevention measures accordingly in their Area of Influence. No material risks were identified.</p> <p>Water-related data are disclosed in the 2025 Sustainability Report: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf</p>
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity, as no Material water-related risks were identified.

CRITERION	RATING	COMMENT
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	Environmental risk assessments are undertaken as part of approval procedures. The risk assessment addresses the Entity's Area of Influence including an assessment of Biodiversity Impacts. No risks were identified.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as no Material Biodiversity impacts were identified in the risk assessment. If necessary, 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	<p>This Criterion is not applicable to the Entity, as no Material Biodiversity impacts were identified in the risk assessment. In future, should it be required, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed..</p> <p>Biodiversity issues are also subject to the Entity's operating permit (BlmSchG). Even though no Material impact has been identified, actions were taken to prevent Biodiversity impacts.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as no Material Biodiversity impacts were identified in the risk assessment. In future, should it be required, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.4 Alien Species	Conformance	The Entity has taken preventive actions to prevent the introduction of Alien Species. Packaging materials used for export materials (e.g., wooden pallets) are thermally treated (IPPC-treatment) to eliminate the risk of Alien Species introduction to other regions.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity, as there are no World Heritage sites in or near the Entity's Area of Influence.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as there are no Protected Areas 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 Novelis Group publicly subscribes to the United Nations (UN) Guiding Principles and has issued and communicated both its Code of Conduct and Supplier Code of Conduct, which include 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 has not identified any issues that have caused or contributed to adverse Human Rights impacts.</p>

CRITERION	RATING	COMMENT
		<p>The Entity has established an Ethics Hotline.</p> <p>The Novelis Group also supports the Ten Principles of the United Nations Global Compact on Human Rights, Labour Rights, environment and anti-Corruption: https://ungc-production.s3.us-west-2.amazonaws.com/attachments/Organization/129081/original/Novelis_Inc._-Letter_of_Recommitment.pdf?1542995069</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has published commitments regarding gender equity in their Code of Conduct and local legislation is very strict on the topic. There are no known deviations from law or complaints.</p> <p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to the women's rights requirements. During the interviews and document review, no indication for deliberate Discrimination of women was observed. Novelis has identified the need to overcome the historical disadvantage of women as one its priorities and has established the 'Woman in Novelis' (WiN) program that aims to motivate, retain and develop all employees, with a focus on building and celebrating a diverse culture that includes female employees.</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.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in Germany where the Entity operates.
9.5a Cultural and Sacred Heritage – Identification	Not Applicable	This Criterion is not applicable to the Entity, as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence. 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 no sacred or cultural heritage sites and values within the Entity's Area of Influence are present. 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 no resettlements are being considered or have taken place during the period since joining ASI, nor expected to occur during the Certification Period. Indigenous Peoples are not directly affected by the Entity's operations.

CRITERION	RATING	COMMENT
9.7a-h Affected Populations and Organisations	Conformance	<p>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 neighbourhood, the Community and all other interest groups in the vicinity of the work. An evaluation of the interested parties has been undertaken which confirmed that there are no risks or any negative or Material impacts. Further information is available in the 2025 Sustainability Report: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf</p> <p>The Entity achieves 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. Further information is included in the Form 10-K Annual Report: 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 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 Novelis supplier, suppliers 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 supplier compliance.</p> <p>The Supplier Code of Conduct is available at: https://novelis.com/download/novelis-supplier-code-of-conduct/</p>
9.8b Conflict-Affected and High-Risk Areas – Identify and assess risks	Conformance	<p>The Entity evaluates and assesses their suppliers based on various aspects of the Supplier Code of Conduct, assigning a risk score to each supplier. This risk score informs the Entity in determining whether any action is needed 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 Entity has implemented a supplier management process and a Supplier Code of Conduct which facilitates the Entity to conduct audits or inspections and require annual supplier evaluations. Risks are recognised at an early stage, allowing the Entity to on an ‘as needs’ basis.</p>
9.8d Conflict-Affected and High-Risk Areas – Audit of due diligence	Conformance	<p>The Entity's Management Systems are audited annually by an external certification body which includes internal audits for Due Diligence practices.</p> <p>The Entity's Due Diligence practices were audited as part of this ASI Audit, which meets the requirement for this Criterion.</p>
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity reports annually on its management of responsible sourcing in the Novelis 2025 Sustainability Report: https://creative.novelis.com/m/171db7a961eba21c/Novelis-Sustainability-Report-2025-Advancing-Circularity.pdf</p>
9.9 Security practice	Conformance	<p>The Entity undertakes security requirements for the site, through an external security provider (Kötter Security) for gate control and plant security. A self-assessment against ISO 26001 has been undertaken, and interviews confirmed Human Rights are respected.</p>

10. LABOUR RIGHTS

CRITERION	RATING	COMMENT
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the local regulations on Worker's rights and applies a collective agreement for the metallurgy sector. All Workers are free to join local Union organisations.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as the right to Freedom of Association and Collective Bargaining are not restricted in the country (Germany) where the Entity operates.
10.2a-c Child Labour	Conformance	The Entity has implemented Policies and complies with 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 the Worst Forms of Child Labour or Hazardous Child Labour. Young Workers are engaged for educational purposes only and any work with hazardous substances only occurs under supervision and as part of vocational education.
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 discloses a 'stand-alone' policy for Human Rights and Forced Labour at: https://www.novelis.com/wp-content/uploads/2025/02/Human-Rights-Policy.pdf</p> <p>A 'stand-alone' annual statement disclosing how Novelis identifies, prevents and addresses Modern Slavery and Human Trafficking is available at: https://novelis.com/wp-content/uploads/2025/05/Novelis_Inc._FY25_Report_on_Fighting_Against_Forced_Labour_and_Child_Labour_in_Supply_Chains.pdf</p>
10.4a-c Non-Discrimination	Conformance	<p>The Entity ensures equal opportunities and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker based on gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. Positions are classified and are part of a collective agreement. This was confirmed during the Audit through interviews and document review.</p> <p>The Policy Against Harassment is available at: https://novelis.com/wp-content/uploads/2025/02/Policy-Against-Harassment.pdf</p>
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or harassment. This was confirmed during the Audit through interviews and document review.
10.6a-g Violence and Harassment	Conformance	The Entity has developed standards in collaboration with the Works Council that set clear rules where the Entity neither engages in, nor

CRITERION	RATING	COMMENT
		<p>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 Works Council and document review. All employees attend culture workshops.</p> <p>The Policy Against Harassment is available at: https://novelis.com/wp-content/uploads/2025/02/Policy-Against-Harassment.pdf</p>
10.7a-c Remuneration	Conformance	<p>The Entity respects the Rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard, as confirmed during the Audit by document review and Worker interviews. Working Time, payment and leave are negotiated in the Collective Bargaining Agreement. Wages paid are substantially above the legal minimum and they are in line with the industry standard. The Entity's wage payments are timely, in legal tender and fully documented, as verified during interviews and document review.</p>
10.8a-c Working Time	Conformance	<p>The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreement and part of each employment contract. A clocking-in system is in place and records are kept.</p>
10.9a-b Informing Workers of Rights	Conformance	<p>The Entity informs employees of their Rights via different 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.</p>
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>An Occupational Health and Safety (OH&S) Management System certified against ISO 45001:2023 has been implemented. Internal and external audits are conducted to confirm the effectiveness of the OH&S Management System, and any identified non-conformances are actioned by the Entity.</p> <p>The Certificate is available at: https://de.novelis.com/wp-content/uploads/2024/11/SZI-A-1620-A-Zertifikat-45001-Novelis-Deutschland-2025-05-eng.pdf?_gl=1*1e7h4y8*_up*MQ.*_ga*MTE2OTU2NDA5OC4xNzYwNDM0OTQx*_ga_QFTZZEG24H*cze3NjA0MzQ5NDAkbzEkZzEkdDE3NjA0MzQ5NDQkajU2JGwwJGgw</p>
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 is certified to ISO 45001:2023 and is operating effectively.</p> <p>OH&S lagging indicators are disclosed in the 2025 Sustainability Report: https://novelis.com/sustainability/2025-sustainability-report/</p> <p>OH&S 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 has been undertaken with internal peer businesses (because of available data), and disclosed via</p>

CRITERION	RATING	COMMENT
		https://www.novelis.com/wp-content/uploads/2025/02/OHS-leading-indicators.pdf
11.2 Employee engagement on Health and Safety	Conformance	The Entity's employees are involved in the preparation of risk assessments. Safety Officers have a mandate in the regular OH&S Committee meetings (held four times a year). There are 23 safety representatives across the 'shop floor' at the Entity.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	25 November 2019	Initial Certification Audit – Full Certification
1	17 January 2023	Re-Certification Audit – Full Certification
2	20 November 2024	Surveillance Audit
3	4 December 2025	Re-Certification Audit and Scope Change – Full Certification Scope Change to apply ASI Performance Standard V3.1