

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis (Voerde)

CERTIFICATE NUMBER
146

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

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
SZI GMBH

DATE OF ISSUE
30 AUGUST 2025

DATE OF EXPIRY
29 AUGUST 2028

CERTIFIED SINCE
31 AUGUST 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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 Voerde
(Germany) Casthouse site to
produce Aluminium products
including melting and casting.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis (Voerde)
CERTIFICATION SCOPE	All activities on the Voerde (Germany) Casthouse site to produce Aluminium products including 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 – 31 March 2021)Surveillance Audit (3 February 2022)Surveillance Audit (24 – 25 January 2024)Re-Certification Audit and Scope Change (28 –30 July 2025)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">30 – 31 March 2021 (Initial Certification Audit)3 February 2022 (Surveillance Audit)24 – 25 January 2024 (Surveillance Audit)28 – 30 July 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">7 July 2021 (Initial Certification Audit)30 June 2022 (Surveillance Audit)5 March 2024 (Surveillance Audit)28 October 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (30 – 31 March 2021)</u></p> <p>The Audit Scope includes all activities on the Voerde (Germany) Casthouse site to produce Aluminium products including melting and casting.</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 (March 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a ‘desktop’ exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and webcam footage of specific controls related to high-risk activities.</p>

Surveillance Audit (3 February 2022)

The Audit Scope includes all activities on the Voerde (Germany) casthouse site to produce Aluminium products including melting and casting.

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 (24 – 25 January 2024)

The Audit Scope includes all activities on the Voerde (Germany) Casthouse site to produce Aluminium products including melting and casting.

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 (28 – 30 July 2025)

The Audit Scope includes all activities on the Voerde (Germany) Casthouse site to produce Aluminium products including melting and casting.

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

30 August 2025 – 29 August 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

1 March 2027

CERTIFICATE NUMBER

146



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 Casthouse Germany GmbH (the 'Entity') operates as a key part of Novelis' global network, specifically focused on Aluminium Casting and the production of Aluminium ingots, billets, and other semi-finished Aluminium products for the automotive industry, building-and-construction-industry and the aerospace sector. The plant is located in Voerde, a strategic location in Germany, central to Novelis' broader European manufacturing footprint. It serves as an essential supplier of Aluminium cast products that feed into further processing at other Novelis facilities. The Entity operates four melting furnaces, two holding furnaces and two casting lines. In addition, four homogenisation furnaces and an ingot saw are in operation. Other ancillary infrastructure on site includes one water-cooling-station and two office buildings.

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	Medium	MEDIUM
RISKS	High	High	High	HIGH
PERFORMANCE	High	High	High	HIGH
OVERALL	HIGH			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has implemented a Code of Conduct, including environmental, social and governance performance principles.</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> <p>The Entity also has a Supplier Code of Conduct that suppliers must sign before delivering products or services: https://novelis.com/download/novelis-supplier-code-of-conduct/</p>
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 with regard to business ethics. Corporate Headquarters operates a 'whistleblowing' hotline where potential breaches or suspected Corruption can be reported confidentially.</p> <p>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 is available at: https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p> <p>The Entity also has a Supplier Code of Conduct that suppliers must sign before providing services or products: 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 Environment, Health, Safety and Quality (EHSQ) Policy is communicated both internally and externally. Internal communication is ensured through annual training and information bulletins and external communication is available online: 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 ISO 14001, ISO 9001, ISO 50001 and ISO 45001 certifications, which are consistent with the ASI Certification Scope.</p>
2.2a-c Leadership	Conformance	<p>The Novelis CEO has corporate responsibility and authority to ensure Conformance with the Performance Standard. A Management Representative group has been appointed to have overall responsibility and authority to ensure Conformance with the ASI Performance Standard at the Entity level.</p>

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>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.</p> <p>https://novelis.com/wp-content/uploads/2024/11/SZI-U-4480-A-Zertifikat-14001-Novelis-Casthouse-2024-12-eng.pdf</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has established an Environmental Management System certified according to ISO 14001:2015. Furthermore, the Entity has implemented and fulfils the requirements of a Social Management System (ISO 26000). Compliance is ensured through regular verifications and audits.</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented the Novelis Responsible Sourcing Policy that addresses environmental, social and governance issues. The Entity's main suppliers are required to complete and sign a self-declaration and suppliers are regularly assessed in accordance with the Supplier Code of Conduct, available at:</p> <p>https://novelis.com/download/novelis-supplier-code-of-conduct</p>
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 have occurred since it joined ASI.</p> <p>As part of the internal risk assessment process, influencing factors such as environmental, 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>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as no New Projects or Major Changes have occurred since it joined ASI.</p> <p>.</p> <p>As part of the internal risk assessment process, influencing factors such as environmental, 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	<p>The Entity has implemented and provided training on the Emergency Response Plan. External Stakeholders such as the Community and authorities are involved. Regular training with the local fire brigade, the Community and Workers is undertaken. The Emergency Response Plan is publicly disclosed at both gatehouses. It is not published online due to security considerations such as the inclusion of camera locations and personnel names.</p>
2.8a-d Suspended Operations	Conformance	<p>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 individuals in case of an emergency, breakdown, fire, or accident with all necessary documents and contact details.</p>

CRITERION	RATING	COMMENT
2.9a–b Mergers and Acquisitions	Conformance	The Entity does not manage mergers and acquisitions. Merger and acquisition activities are executed by the Novelis Headquarters and 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 the Entity's planning process. Closure, decommissioning and divestment are not managed on the local level but by Corporate Headquarters. There are no closure, decommissioning or divestment plans for the Entity since they joined ASI.
3. TRANSPARENCY		
3.1a–b Sustainability Reporting	Conformance	The Entity is part of the Novelis Group Sustainability Reporting. The Group has publicly disclosed its governance approach and its Material environmental, social and economic impacts in the 2024 Sustainability Report, available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
3.2 Non-Compliance and Liabilities	Conformance	Entity-specific information on significant fines, judgements, penalties and non-monetary sanctions is published by the district government (SGD Nord). Public access is ensured via the EU Directive 2003/4/EC executed as the <i>Environmental Information Act (UIG)</i> . There are no violations present at this time. https://www.umweltbundesamt.de/themen/nachhaltigkeit-strategien-internationales/umweltrecht/zugang-zu-umweltinformationen#hintergrund-und-ziele-des-umweltinformationsgesetzes
3.3a–c Payments to Governments	Conformance	The Entity complies with the strict local legislation and has implemented Policies and procedures to conform to this requirement. To prevent Corruption, detailed behaviour expectations are described in the Novelis Code of Conduct, which includes the requirements where payments are made to authorities and payments to governments are not allowed. All employees are trained on the Code of Conduct annually. https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf Relevant information is available in the annual financial reporting in the US Securities and Exchange Commission Form 10-K (section 13): 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*cZ_E3NDc3NDElNjgkbzEkZzAkDE3NDc3NDElNjgkajAkdDAkDA
3.4a–f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity is certified against ISO 14001:2015 and ISO 9001:2015 standards and has implemented a Complaints Resolution Mechanism. A ‘whistleblowing’ and ethics hotline is established: https://app.convercent.com/en-US/LandingPage/918012dd-5b57-eel1-a9a3-000d3ab9f062?_id=1695920313532 A Whistleblower Policy is disclosed: https://novelis.com/wp-content/uploads/2025/02/Whistleblower-Policy.pdf

CRITERION	RATING	COMMENT
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has prepared Life Cycle Assessments (LCA's) for its main Product groups. In cooperation with an external service provider, life cycle evaluations are carried out. At the customer's request, data is sent to the provider and a new Product related LCA is created for the customer. The requirements of ISO 14040 are fulfilled.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity contributes Life Cycle Inventory (LCI) data to regional initiatives such as The Aluminium Association and European Aluminium's Sustainable Development Indicators (SDI) (https://www.european-aluminium.eu). 'Cradle-to-gate' LCA's are provided to customers for their Products upon request.</p> <p>LCA are available for the relevant Products and 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's Certification Scope.
4.3a-b Aluminium Process Scrap	Conformance	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. There is 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	<p>An Aluminium recycling strategy is in place. The established goals are fulfilled and a continuous increase in the recycling rate is aimed for. The Novelis Group is actively engaged in European initiatives or groups that support and improve national collection rates.</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	<p>The Entity is part of the international Greenhouse Gas (GHG) trade. Data relating to energy consumption, emissions, waste, and water consumption are visible in working areas ('shop floor').</p> <p>The Entity's Scopes 1-3 GHG emissions and energy use by source data is publicly disclosed on an annual basis in the Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity has undertaken environmental operational activities to reduce energy consumption and GHG emissions including the setting of targets at both the regional and plant level, installation of meters and action plans. Key Performance Indicators (KPI's) relating to GHG Emissions and associated targets are provided in the annual Sustainability Report (pages 14 – 16) and Green Bond Report Annual Report, available at: https://novelis.com/sustainability/fy2024-sustainability-report/# https://novelis.com/sustainability/green-bond-report-annual-report-2024</p> <p>The Entity has used the ASI GHG Emissions Reduction Pathway methodology</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	<p>The Entity has undertaken environmental operational activities to reduce energy consumption and GHG emissions including the setting of targets at both the regional and plant level, installation of meters and action plans. KPIs relating to GHG Emissions and associated targets are provided in the annual Sustainability Report (pages 14 – 16) and Green Bond Report Annual Report, available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf https://novelis.com/sustainability/green-bond-report-annual-report-2024</p>
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented an ISO 14001 and ISO 5001 certified Management System, which is audited annually. Projects to reduce GHG emissions are described and implemented, and projects are tracked at both plant and regional levels.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Emissions to Air are controlled according to local regulations and permits. The emissions are monitored, controlled and reduced over time. All data is disclosed via the Sustainability Report: https://novelis.com/sustainability/fy2024-sustainability-report/#</p>
6.2a-g Discharges to Water	Conformance	The Entity does not directly discharge wastewater into bodies of water. The Entity maintains a license for wastewater to be discharged to the public network via the wastewater treatment system of the permit holder, TRIMET. Monitoring of the limit values defined by the operating license is continuously monitored in accordance with specifications.
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has performed risk assessments and implemented measures to prevent and detect contamination of air, water, and soil. Regular internal audits are conducted to verify the effectiveness and adherence to defined actions. Emergency procedures for major risk areas have been introduced. The Entity has performed risk assessments and implemented prevention measures on Material

CRITERION	RATING	COMMENT
		Spills and Leakages. Relevant Spills are reported to the authority and, if necessary, to all other relevant interested parties by the authority.
6.4a-b Public Disclosure of Spills and Leakages	Conformance	<p>The reporting of Spills is regulated, trained and tested, and there are regular visits by the district government. There have been no reportable Spills inside/outside the plant since the ISO 14001 certified Environmental Management System was implemented in 2018:</p> <p>https://www.brd.nrw.de/umweltinspektionsberichte/voerde/voer-007-legieren-abgiessen-homogenisieren-und-saegen-von</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste Management Strategy. The goals for Waste management are fulfilled, and a reduction of the waste stream is recognisable. The Entity's Waste Management Strategy has been completed in accordance with the Waste Mitigation Hierarchy.</p> <p>The Authority may, if necessary, request the report from the Waste Officer, and regular monitoring by the district government verifies compliance with legal requirements:</p> <p>https://app.thru.de/details/637646/karte</p> <p>The Entity has publicly disclosed the quantities of Hazardous and Non-Hazardous Waste generated and the associated waste disposal methods in the Sustainability Report:</p> <p>https://de.novelis.com/sustainability/fy2024-sustainability-report/#</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Conformance	The Entity recycles 100% of the white Dross internally. After treating the black Dross with argon and cooling it to stop the oxidation process, it is sent to external local Contractors, who treat the Dross and return it as Aluminium bars. There is no landfilling of Dross residues.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The Entity monitors water usage according to local regulations and water usage information is disclosed in the Sustainability Report, pages 18 and 70:</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>An overview of the water inflows, various on-site consumption data and various wastewater flows are described and regularly reviewed. The Entity has assessed its water-related risks and implemented prevention measures accordingly in its entire Area of Influence. There are no risks detected.</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	The Entity has conducted an environmental risk assessment, which is undertaken as part of the approval procedures for legal requirements. The risk assessment addresses the Area of Influence of the Entity including 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 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	This Criterion is not applicable to the Entity, as no Material impact has been identified. Regardless, there is regular reporting during the annual management review and public reporting to the state environmental authorities.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as there were no Material Biodiversity impacts identified in the risk assessment. If necessary, 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 actions to prevent the introduction of Alien Species. Packaging material used for export materials (e.g. wooden pallets) are thermally treated (IPCC-treatment) to eliminate the risk of Alien Species introduction to other regions.
8.5a-b Commitment to 'No Go' in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity, as there are no World Heritage sites in or near its Area of Influence.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity, as there no Protected Areas in or near its 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 and has issued and communicated its Code of Conduct (Promote a Desirable Work Environment) and Supplier Code of Conduct (Labour and Human Rights), with a commitment to respecting Human Rights. Both Codes are available at:</p> <p>https://novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf</p> <p>https://novelis.com/download/novelis-supplier-code-of-conduct</p> <p>The Entity has not identified any issues that have caused or contributed to adverse Human Rights impacts. The Entity has established an 'Ethics Hotline'. Novelis supports the Ten Principles of the United Nations Global Compact on Human Rights, Labour,</p>

CRITERION	RATING	COMMENT
		Environment and Anti-Corruption: https://d306pr3pise04h.cloudfront.net/attachments/Organization/129081/original/Novelis_Inc._-_Letter_of_Recommitment.pdf?1542995069
9.2a-e Gender Equity and Women's Empowerment	Conformance	The Entity has developed and implemented Policies, systems, procedures and processes that conform to the women's rights requirements. The Entity has identified the need to overcome the historical disadvantage of women as one of its priorities and has established the programme 'Woman in Novelis' (WiN). This programme aims to motivate, retain and develop all employees, focusing on building and celebrating a diverse culture that includes female employees. Targets are disclosed in the Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
9.3a-i Indigenous Peoples	Not Applicable	This Criterion 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 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 is not applicable to the Entity, as no sacred or cultural heritage sites or values are present within the Entity's Area of Influence. Also, Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as no sacred or cultural heritage sites or values are present within the Entity's Area of Influence. Also, Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	<p>This Criterion is not applicable to the Entity, as there are no planned expansions of the entire plant which may have an impact. However, the requirements of the ASI Performance Standard will be considered as part of the new risk assessment.</p> <p>There are no resettlements being considered or have taken place during the period since joining ASI or are expected to occur during the Certification Period.</p>
9.7a-h Affected Populations and Organisations	Conformance	The Entity does not claim any resources that could lead to a lack of resources in the area and among its population. The Entity respects and is sensitive to the neighbourhood, the Community and all other interest groups in the vicinity of the work. An evaluation of the

CRITERION	RATING	COMMENT
		<p>interested parties has been undertaken, and no negative impacts were identified.</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 Novelis supplier, the supplier 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. The Supplier Code of Conduct is available at:</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 evaluates and assesses their suppliers based on various aspects of the Supplier Code of Conduct and assigns a risk score to each supplier. This risk score helps the Entity determine whether any action is needed or not. If needed, suppliers may be blocked.</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 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 and on an ad hoc 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 processes were included in this ASI Audit, which addresses the requirement.</p>
9.8e Conflict-Affected and High-Risk Areas – Report annually	Conformance	<p>The Entity reports annually on the management of responsible sourcing, which is available at:</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 itself performs most security function but 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 Worker's rights and applies a Collective Bargaining Agreement for the metallurgy sector. The majority of Workers have joined a Trade Union and there is an elected Works Council.</p>
10.1d Freedom of Association and Right to Collective Bargaining –	Not Applicable	<p>This Criterion is not applicable to the Entity, as there is no need for alternative means in the country where the Entity is located.</p>

CRITERION	RATING	COMMENT
Alternative means in context of Applicable Law		
10.2a Child Labour	Conformance	The Entity has implemented Policies and local regulations to avoid the hiring of Child Labour. The Entity has strict control over any potential Child Labour. The Entity neither uses nor supports the use of Child Labour and does not engage in or support Hazardous Child Labour. Young Workers are engaged for educational purposes only. If at all, work with Hazardous substances happens only under supervision and as part of vocational education. The Entity does not engage in or support the Worst Forms of Child Labour.
10.3a-c Forced Labour	Conformance	<p>The Entity neither engages in, nor supports the use of Forced Labour and follows the hiring process and operations according to German law and ILO Conventions. The Entity does not engage in, nor support Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and document review. The Novelis Human Rights and Forced Labour Policy is available at: https://www.novelis.com/wp-content/uploads/2025/02/Human-Rights-Policy.pdf</p> <p>A stand-alone annual Modern Slavery Statement outlining the Novelis Group's efforts to identify, prevent and address modern slavery and Human Trafficking is available at: https://www.novelis.com/wp-content/uploads/2024/06/Novelis-Inc.-Report-for-FY-2024-on-Fighting-Against-Forced-Labour-and-Child-Labour-in-Supply-Chains.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity ensures equal opportunities and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker based on gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. Positions are classified and are part of a Collective Bargaining Agreement. This was confirmed by interviews and document review.
10.5 Communication and engagement	Conformance	The Entity places significant importance on maintaining good relations with its employees and promotes a 'say anything' culture, which involves conducting employee engagement surveys. Interviews with the Works Council confirmed that the cooperation is effective. Discussions are also handled professionally and constructively.
10.6a-g Violence and Harassment	Conformance	<p>The Entity has developed standards in collaboration with the Works Council that establish clear rules where the Entity neither engages in, nor tolerates the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence including sexual Harassment, or verbal abuse of Workers. This was confirmed by interviews with the Works Council and document review. All employees attend culture workshops.</p> <p>Policy Against Harassment: https://www.novelis.com/wp-content/uploads/2025/02/Policy-Against-Harassment.pdf</p>
10.7a-d Remuneration	Conformance	The Entity respects the rights of Workers to a living wage and ensures that wages paid for a normal working week meet the industry standard, as confirmed by document review and Worker interviews. Working Time, payment and leave are negotiated in the Collective

CRITERION	RATING	COMMENT
		Bargaining Agreement. The 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 by interviews and document review.
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining Agreement and part of each employment contract. A clocking-in system is in place and records are kept.
10.9a-b Informing Workers of Rights	Conformance	The Entity informs employees of their rights via various channels including the intranet and information boards. The Works 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	An Occupational Health and Safety (OH&S) Management System (non-certified) is implemented and working effectively. Any identified non-conformances are actioned by the Entity. Internal and external audits are conducted to confirm the effectiveness of the OH&S system.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has implemented an OH&S Management System that conforms to the requirements of ISO 45001 and is working effectively.</p> <p>Lagging OH&S indicators are disclosed via Sustainability Report: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>Leading OH&S indicators are disclosed at: https://www.novelis.com/wp-content/uploads/2025/02/OHS-leading-indicators.pdf</p> <p>A comparative performance analysis with peer Businesses and leading practices is only possible with internal peer Businesses (due to the availability of data) and is disclosed at: https://www.novelis.com/wp-content/uploads/2025/02/OHS-leading-indicators.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	Employees are engaged in the preparation of risk assessments. The Safety Officers have a mandate at regular OH&S Committee meetings, which are held four times a year. Accidents are reported internally and externally to relevant parties and, if necessary, to authorities.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	31 August 2021	Initial Certification Audit – Provisional Certification
1	30 August 2022	Surveillance Audit – Full Certification
2	20 March 2024	Surveillance Audit
3	12 November 2025	Re-Certification Audit and Scope Change – Full Certification