ASI CERTIFICATION **PERFORMANCE STANDARD**

PRESENTED TO

Novelis Deutschland GmbH Werk Goettingen

CERTIFICATE NUMBER	ASI STANDARD	CERTIFICATION LEVEL	ASI ACCREDITED AUDITING FIRM
97	PERFORMANCE STANDARD (V3.1 2023)	FULL CERTIFICATION	SZI GMBH
DATE OF ISSUE	**DATE OF EXPIRY**	**CERTIFIED SINCE**	
2 OCTOBER 2026	1 OCTOBER 2029	2 OCTOBER 2020	

AUTHORISED BY

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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 Goettingen (Germany) site to produce aluminium products including coating, finishing and impact extrusion.

AUDIT REPORT **PERFORMANCE STANDARD**

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis Deutschland GmbH Werk Goettingen
CERTIFICATION SCOPE	All activities on the Goettingen (Germany) site to produce Aluminium products including coating, finishing and impact extrusion.
SUPPLY CHAIN ACTIVITIES	• Semi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	• Initial Certification Audit (6 May – 17 June 2020) • Surveillance Audit (29 – 30 March 2022) • Re-Certification and Scope Change Audit (5 – 7 September 2023) • Surveillance Audit (3 – 5 March 2025) • Re-Certification Audit (24 – 27 August 2026)
AUDIT FIRM	SZI GmbH
AUDIT DATE	• 6 May – 17 June 2020 (Initial Certification Audit) • 29 – 30 March 2022 (Surveillance Audit) • 5 – 7 September 2023 (Re-Certification and Scope Change Audit) • 3 – 5 March 2025 (Surveillance Audit) • 24 – 27 August 2026 (Re-Certification Audit)
AUDIT REPORT SUBMISSION	• 7 September 2020 (Initial Certification Audit) • 3 May 2023 (Surveillance Audit) • 14 September 2023 (Re-Certification and Scope Change Audit) • 28 April 2025 (Surveillance Audit) • 7 September 2026 (Re-Certification Audit)
AUDIT SCOPE	Initial Certification Audit (6 May – 17 June 2020) The Audit Scope covered all Processes applied in Goettingen facility. Supply chain activities included in the Audit Scope: • Semi-Fabrication All relevant supply chain activities, and Criteria in the Performance Standard were included in the Audit Scope. Surveillance Audit (29 – 30 March 2022) The Audit Scope included the Goettingen facility and its industrial products. 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 and Scope Change Audit (5 – 7 September 2023) The Audit Scope included the Goettingen facility and its industrial products. Supply chain activities included in the Audit Scope: • Semi-Fabrication All relevant Criteria in the ASI Performance Standard were included in the Audit Scope. Surveillance Audit (29 – 30 March 2022) The Audit Scope included the Goettingen facility and its industrial products. 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 and Scope Change Audit (5 – 7 September 2023) The Audit Scope included the Goettingen facility and its industrial products. 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
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	2 October 2026 – 1 October 2029
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DATE	1 April 2028
CERTIFICATE NUMBER	97
	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 Göttingen plant (the 'Entity') is located in central Germany and has been in operation since 1909. It specialises in the surface-treatment of rolled Aluminium. More than 1,200 different systems are used for decorative or functional coatings, which are adjusted precisely to match the final customer application process.

The Entity has multiple capabilities for the treatment of Aluminium coils including, pre-treatment, lacquering, laminating, finishing and impact extrusion and is a recognised leader in the supply of Aluminium for markets including:

- Surface-finished Aluminium for beverage, food and cosmetic can producers
- Plain and surface-finished aluminium for building and construction, signage, and other specialty product industries
- Impact extrusion for bottles, aerosol cans, cartridges and technical packaging.

Novelis has operated a Research and Development Centre in Göttingen since 2007, focusing on the examination and development of surface coatings and the simulation of end user's production processes. In addition, the site is a competence centre for many central services within Novelis Europe.

The nine hectare site is located on the outskirts of the city, employs approximately 700 people and has links to the Göttingen University. Active in the local area, the Entity supports many initiatives under the 'Novelis Neighbor' programme including annual sponsorship of the Göttingen City Run and since 2013 Novelis has been supporting robotics school teams close to Göttingen to inspire young people in science and technology.

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

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has implemented a process to constantly maintain awareness of and ensure Compliance with the latest Applicable Law.
1.2 Anti-Corruption	Conformance	Anti-Corruption is regulated at the Entity, where the Novelis Group specifications are trained and implemented at the Business level. The Ethics Helpline is available at: https://app.convercent.com/en-US/LandingPage/918012dd-5b57-ee11-a9a3-000d3ab9f062?_=1695920313532 Anti-Corruption Policy: https://novelis.com/wp-content/uploads/2026/06/Anti-Corruption-Policy-rev-2024_Global.pdf
1.3a-e Code of Conduct	Conformance	The Entity has implemented the Novelis Code of Conduct and has provided training on the Code, available at: https://novelis.com/wp-content/uploads/2026/06/Code-of-Conduct-2026_Global.pdf Additionally, suppliers must comply with the Supplier Code of Conduct, available at: https://novelis.com/wp-content/uploads/2026/06/Novelis-Supplier-Code-of-Conduct-ENG-2025.pdf
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Entity has implemented an Environment, Health, Safety and Quality (EHSQ) Policy which is communicated both internally and externally via the Novelis website. Internal communication is ensured through annual training and announcements. The Entity has senior management endorsement and support through the provision of resources and regular review of the Policies. The Entity has obtained ISO 14001, ISO 50001 and ISO 45001 certifications which are consistent with the Certification Scope. The EHSQ Policy is available at: https://novelis.com/wp-content/uploads/2026/03/EHS-Policy-Guidelines_All-Languages_2024.pdf
2.2a-c Leadership	Conformance	The Novelis CEO has corporate responsibility and authority to ensure Conformance with the ASI Performance Standard. The Entity has defined the Management Representative for ASI.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has documented and implemented an Integrated Management System according to ISO 9001, ISO 14001, ISO 50001, and ISO 45001. These systems are certified by an accredited certification body. The ISO 26000 standard will be audited internally.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has documented and implemented an Environmental Management System that is certified according to ISO 14001:2015. Furthermore, the Entity has implemented and fulfils the requirements for ISO 26000 and 'Together for Sustainability' (TfS). Internal social and compliance audits are undertaken regularly.

CRITERION	RATING	COMMENT
2.4a-e Responsible Sourcing	Conformance	The Entity has implemented a Responsible Sourcing Policy that addresses environmental, social and governance issues, available at: https://novelis.com/wp-content/uploads/2026/03/Responsible-Sourcing-Policy.pdf Key suppliers are required to complete and sign a self-declaration. Suppliers are regularly assessed. The Supplier Code of Conduct is available at: https://novelis.com/wp-content/uploads/2026/06/Novelis-Supplier-Code-of-Conduct-ENG-2025.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 Entity 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). The Entity has established systems to manage this and conduct internal risk assessments which include environmental, social and Human Rights.
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 Entity 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). The Entity has established systems to manage this and conduct internal risk assessments which include environmental, social and Human Rights.
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented and provided training on the Emergency Response Plan. External Stakeholders including the Local Community and local authority are involved in the development of this Plan. Regular training with the local firefighters, the Community and Workers is undertaken. The Emergency Response Plans is available at: https://novelis.com/wp-content/uploads/2026/06/NDO-Verhalten-bei-Notfallen-Gottingen.pdf
2.8a-d Suspended Operations	Conformance	The Entity has implemented a Business Resilience Plan. All involved parties are trained, and evacuation and emergency drills are carried out frequently. An app has been introduced to support responsible persons in case of an emergency, breakdown, fire, or accident with all necessary documents and contact details.
2.9a-b Mergers and Acquisitions	Conformance	Mergers and acquisitions are executed by Novelis Corporate and are accompanied by a Due Diligence process that is supported by external specialists to reflect environmental, social and governance issues.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity has systematically reviewed environmental, social and governance issues as part of the Entity's planning process. Closure, decommissioning, and divestment are not managed at the Entity-level, rather by Novelis Corporate. There have been no closure, decommissioning or divestment plans for the Entity since it joined ASI.
3. TRANSPARENCY		

CRITERION	RATING	COMMENT
3.1a-b Sustainability Reporting	Conformance	The Entity is included in the Novelis Group Sustainability Report. The Group has publicly disclosed its governance approach and its Material environmental, social and economic impacts in the Novelis Sustainability Report: https://novelis.com/wp-content/uploads/2026/06/Novelis_Sustainability_2025_V26_compressed.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity did not receive any fines, judgements, penalties or non-monetary sanctions for failure to comply with Applicable Law.
3.3a-c Payments to Governments	Conformance	The Entity complies with local legislation and has implemented Policies and procedures regarding payments to Governments. To prevent Corruption, detailed behaviour expectations are described in the Novelis Code of Conduct, which include the requirements where payments are made to authorities and payments to governments are not allowed. Employees are trained on the Code of Conduct annually.
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity is certified against ISO 9001, ISO 14001, ISO 50001 and ISO 45001 and has implemented a process for handling complaints. A 'whistleblowing' hotline has been established (Novelis Ethics Hotline: 0800-180-7003) and complaints can be submitted online at: https://app.convercent.com/en-US/LandingPage/918012dd-5b57-ee11-a9a3-000d3ab9f062?_=1695920313532 The Entity has also implemented a Whistleblower Policy: https://www.novelis.com/wp-content/uploads/2025/02/Whistleblower-Policy.pdf
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted Life Cycle Assessments (LCA) for their standard and specialty Products. The requirements of ISO 14040 are fulfilled.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity contributes Life Cycle Inventory (LCI) data to regional initiatives such as the Aluminum Association and European Aluminium Sustainable Development Indicators (SDI). The LCAs include underlying assumptions and system boundaries, which are 'cradle-to-gate' and are delivered to customers for their Products upon request. The 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	Conformance	When developing new Products, the Entity takes into consideration sustainability and conducts a life cycle analysis. Environmental key metrics have been developed to enhance sustainability, including the environmental life cycle impacts of the end Product.
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 within the Novelis Group. There is closed-loop production and Aluminium alloys and grades are recorded separately and recycled according to type.

CRITERION	RATING	COMMENT
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). The Entity does not operate a recycling process or a smelter, it receives semi-finished products from its sister sites and does not purchase Scrap on the market.
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'). Detailed Greenhouse Gas (GHG) emissions information is available in the Novelis Global Sustainability Report: https://novelis.com/wp-content/uploads/2026/06/Novelis_Sustainability_2025_V26_compressed.pdf GHG emissions data are independently verified.
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	Novelis Group has outlined and established initiatives and activities within each level in its Decarbonisation Strategy to achieve a 2050 goal of carbon neutrality. Activities to reduce GHG emissions have been targeted and planned for several years. The Entity has developed a GHG Emissions Reduction Pathway using the ASI methodology and a 2023 baseline year.
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Conformance	Novelis Group has outlined and established initiatives and activities within each level in its Decarbonisation Strategy to achieve a 2050 goal of carbon neutrality. Activities to reduce GHG emissions have been targeted and planned for several years. Results are tracked and posted in the annual Sustainability Report. Detailed information is available in the 2025 Novelis Sustainability Report: https://novelis.com/wp-content/uploads/2026/06/Novelis_Sustainability_2025_V26_compressed.pdf The Entity has developed a GHG Emissions Reduction Pathway using the ASI methodology, which is publicly disclosed at:

CRITERION	RATING	COMMENT
		https://novelis.com/wp-content/uploads/2026/03/ASI-Decarbonization-Pathway.pdf
5.4 GHG Emissions Management	Conformance	The Entity has implemented an ISO 50001 Management System. Projects to reduce energy consumption are ongoing and the effects of GHG emissions reduction are calculated. The ISO 50001 certificate is available at: https://novelis.com/wp-content/uploads/2026/03/SZI-E-1620-A-Zertifikat-50001-Novelis-Deutschland-2025-05-eng.pdf
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	Emissions to Air are controlled according to local regulations and permits and specified thresholds are not exceeded. Emissions are constantly monitored, controlled and reduced over time. Projects to reduce emissions are planned and tracked at both the plant and regional levels. Data are disclosed in the Sustainability Report: https://novelis.com/wp-content/uploads/2026/06/Novelis_Sustainability_2025_V26_compressed.pdf
6.2a-g Discharges to Water	Conformance	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. All wastewater is discharged into the public sewage network, there is no direct discharging to water.
6.3a-g Assessment and Management of Spills and Leakages	Minor Non-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 for Material Leakages. Relevant Spills are reported to the authority and by the authority to all other relevant public interest parties. An update to the measurement plan (Umweltaspekteanalyse) was not undertaken following a minor leakage event (which was publicly disclosed to the authorities).
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The reporting of Spills is regulated, trained, and tested. One minor leakage in 2024 was reported to the authorities, which will be publicly disclosed via Gewerbeaufsichtsamt Niedersachsen on request.
6.5a-c Waste Management and Reporting	Conformance	The Entity has implemented a Waste management strategy. The goals for Waste management are fulfilled and a reduction of the Waste streams is confirmed. The Entity's Waste Management Strategy has been completed in accordance with the Waste Mitigation Hierarchy. The quantity of Hazardous and Non-Hazardous Waste generated by the Entity and associated Waste disposal methods are disclosed in the Novelis Sustainability Report: https://novelis.com/wp-content/uploads/2026/06/Novelis_Sustainability_2025_V26_compressed.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity monitors its water usage according to local regulations. An overview of water inputs, the various consumers and different wastewater flows are described and regularly reviewed. Water use data are available in the Novelis Sustainability Report: https://novelis.com/wp-content/uploads/2026/06/Novelis_Sustainability_2025_V26_compressed.pdf The Entity has assessed its water-related risks and implemented 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 no Material water-related risks were identified.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted an environmental risk assessment as part of 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 be subject to regularly review. Currently, there are no open measures.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable to the Entity as there were no Material biodiversity impacts identified in the risk assessment. If necessary, Biodiversity actions will be included in the Environmental Action Plan and be subject to regular review. Currently, there are no open measures.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity, as there were no Material biodiversity impacts identified in the risk assessment. If necessary, Biodiversity actions will be included in the Environmental Action Plan and be subject to regular review. 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 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, as there no World Heritage sites in or near the Area of Influence of the Entity.

CRITERION	RATING	COMMENT
8.6a-d Protected Areas	Conformance	The Entity has identified there are no Protected Areas within its Area of Influence (www.umweltkarten-niedersachsen.de)
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 associated 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 examined. The Entity has not identified any issues that have caused or contributed to adverse Human Rights impacts. The Entity's letter of commitment to the United Nations UN Global Compact is 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	Minor Non-Conformance	The Entity has implemented Policies and tools to ensure women's rights are respected. All initiatives are addressed in the Sustainability Report 2025: https://novelis.com/wp-content/uploads/2026/06/Novelis_Sustainability_2025_V26_compressed.pdf The programme's effectiveness however is no longer covered in the Sustainability Report and, as a result, there is no indication of progress reported.
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in Germany where the Entity operates.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as there are no Indigenous Peoples in Germany where the Entity operates.
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 no sacred or cultural heritage sites or values within the Entity's Area of Influence are present.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.

CRITERION	RATING	COMMENT
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there are no plans to expand the plant, no relocation is being considered or has occurred since joining ASI, and there are no expected relocations during the Certification Period. However, the requirements will be taken into account in any future risk assessment.
9.7a-h Affected Populations and Organisations	Conformance	The Entity respects and is sensitive to the neighbourhood, the community, and all other interest groups in the vicinity. An evaluation of the interested parties was undertaken. The Novelis Group requests each of its sites, including the Entity, to engage with Local Communities. The Entity regularly participates in community events (e.g., Göttinger Altstadtlauf).
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Conformance	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: https://novelis.com/wp-content/uploads/2026/06/Novelis-Supplier-Code-of-Conduct-ENG-2025.pdf
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity evaluates and assesses their suppliers based on various aspects of the Supplier Code of Conduct and assigns a risk score to each supplier. This risk score assists the Entity determine whether any action is needed or not. If needed, suppliers may be blocked.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Entity has implemented a Supplier management process and Supplier Code of Conduct which allows it 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.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	The Entity's Management Systems are audited annually by an external certification body which includes internal audits for Due Diligence practices.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	The Entity annually reports on the management of responsible sourcing, which is available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
9.9 Security practice	Conformance	The Entity has implemented security practices that respect Human Rights. The Entity predominantly performs security practices internally but also contracts an external security provider for gate control and plant security. The Entity does not employ armed security forces.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity respects the local regulations on Workers' rights and applies a collective agreement for the metallurgical sector. The majority of the Entity's Workers have joined a Trade Union and there is an elected Workers Council in place.

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 to the Entity as it operates in Germany where Freedom of Association and the right to Collective Bargaining is allowed.
10.2a Child Labour	Conformance	The Entity has implemented Policies and local regulations are in place to avoid the hiring of Child Labour. The Entity neither uses nor supports the use of Child Labour and does not engage in nor support Hazardous Child Labour. Young Workers are employed for educational purposes only. Work with hazardous substances happens rarely, and only under supervision and as part of the vocational education provided. Novelis Human Rights and Forced Labour Policy: https://novelis.com/wp-content/uploads/2026/03/Human-Rights-Policy.pdf
10.3a-c Forced Labour	Conformance	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. Modern slavery is integrated in the Novelis Human Rights and Forced Labour Policy, which is available at: https://novelis.com/wp-content/uploads/2026/03/Human-Rights-Policy.pdf An annual Modern Slavery Statement detailing actions is available at: https://novelis.com/wp-content/uploads/2026/05/Novelis-Report-for-FY-2026-on-Fighting-Against-Forced-Labour-and-Child-Labour-in-Supply-Chains-1.pdf
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 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 and conducts 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	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 by interviews with the Works Council and document review. The Harassment Policy is available at:

CRITERION	RATING	COMMENT
		https://novelis.com/wp-content/uploads/2026/03/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, as confirmed by document review and Worker interviews. Working Time, payment and leave are negotiated in the Collective 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 different 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	The Entity has implemented an Occupational Health and Safety (OH&S) Management System that conforms to the requirements of ISO 45001:2023 and is working effectively. The certificate is valid and covers the Entity's ASI Certification Scope. The Entity's OH&S Management System is well implemented. The ISO 45001 certificate is available at: https://novelis.com/wp-content/uploads/2026/03/SZI-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	Minor Non-Conformance	For reportable accidents (per 1,000,000 hours), the Entity is five times lower than the industry average. Leading and lagging indicators tracked by the Entity include accidents, Days Away from Work Frequency (DAWF), Serious Injuries and Fatalities (SIF), near misses, number of leadership tours, safety training sessions completed and Behaviour Based Safety (BBS). Leading indicators and a comparative analysis are disclosed at: https://novelis.com/wp-content/uploads/2026/08/OHS-Leading-Indicators-Comparative-Analysis-FY27.pdf Lagging indicators relating to Health and Safety have been almost entirely removed from the Sustainability Report. The leading indicators are listed in a separate report and broken down by individual plants, however this does not apply to the lagging indicators. Data are available at the Entity but not disclosed. Refer to the Sustainability Report: https://novelis.com/wp-content/uploads/2026/06/Novelis_Sustainability_2025_V26_compressed.pdf

CRITERION	RATING	COMMENT
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. Daily safety hours were established and documented.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	2 October 2020	Issued (Initial Certification)
1	22 May 2023	Surveillance Audit
2	24 November 2023	Re-Certification and Scope Change Audit from Performance Standard V2 to V3.
3	5 June 2025	Surveillance Audit
4	30 September 2026	Re-Certification Audit – Full Certification