

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

Novelis UK Ltd (Latchford)

CERTIFICATE NUMBER
125

ASI STANDARD
PERFORMANCE
STANDARD
(V3.1 2025)

CERTIFICATION LEVEL
FULL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM
SZI GMBH

DATE OF ISSUE
31 MARCH 2025

DATE OF EXPIRY
30 MARCH 2028

CERTIFIED SINCE
31 MARCH 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 Latchford site
(United Kingdom) to produce
Aluminium products including
shredding, de-coating, melting and
casting.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Novelis Inc.
ENTITY NAME	Novelis UK Ltd (Latchford)
CERTIFICATION SCOPE	All activities on the Latchford site (United Kingdom) to produce Aluminium products including shredding, de-coating, melting and casting.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthouses
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (18 – 19 January 2021)Surveillance Audit (29 November 2021)Surveillance Audit (12 – 14 February 2024)Re-Certification Audit and Scope Change (10 – 13 February 2025)
AUDIT FIRM	SZI GmbH
AUDIT DATE	<ul style="list-style-type: none">18 January – 6 March 2021 (Initial Certification Audit)29 November 2021 (Surveillance Audit)12 – 14 February 2024 (Surveillance Audit)10 – 13 February 2025 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">18 March 2021 (Initial Certification Audit)10 June 2022 (Surveillance Audit)3 June 2024 (Surveillance Audit)8 April 2025 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (18 – 19 January 2021)</u></p> <p>The Audit Scope includes all activities on the Latchford site to produce Aluminium products including shredding, de-coating, 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 (January – 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.</p>

Surveillance Audit (29 November 2021)

The Audit Scope includes all activities on the Latchford site to produce Aluminium products including shredding, de-coating, 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 (12 -14 February 2024)

The audit scope includes all activities on the Latchford site to produce Aluminium products including shredding, de-coating, 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 (10-13 February 2025)

The Audit Scope includes all activities on the Latchford site to produce Aluminium products including shredding, de-coating, 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 including Criteria that were identified as non-conformities from the previous Audit.

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

31 March 2025 - 30 March 2028

NEXT AUDIT TYPE

Surveillance Audit

NEXT AUDIT DATE

30 March 2026

CERTIFICATE NUMBER

125



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 recycling facility (the 'Entity') at Latchford Locks, Warrington has two discrete processing streams, the recycling of general Aluminium scrap and the recycling of used beverage cans. This is the only used Aluminium beverage can recycling plant in the United Kingdom (UK). Produced product from the Entity is directly fed to Novelis sister plants in Germany and Switzerland for onward machining prior to customer delivery, and therefore, the Entity is potentially critical to downstream Novelis operations.

The Entity has two casting centres - one for General Products Production (GPP), and one for Used Beverage Cans (UBC). In both value streams, primary Aluminium and Recycled Aluminium material are melted in gas-fired melting furnaces. This molten metal may have additives used to meet the correct grade/alloy of Aluminium; metal is sampled to confirm chemical composition. Molten metal is also treated to achieve Aluminium purity before it is cast through a launder box into sheet ingot Aluminium.

The Management System has been developed in accordance with the requirements of ISO standards 14001, 45001 and 9001.

MATURITY RATINGS

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

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

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	High	High	High	HIGH
RISKS	High	High	High	HIGH
PERFORMANCE	High	Medium	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. There are systems in place to maintain awareness of and ensure compliance with Applicable Law. The Entity holds ISO 14001, ISO 50001, ISO 45001, and ISO 9001 certifications from accredited certification bodies.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, consistent with Applicable Law and prevailing international standards. Among the instruments, 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. Ethics Hotline: https://app.convercent.com/en-US/LandingPage/918012dd-5b57-ee11-a9a3-000d3ab9f062?_a=1695920313532
1.3a-e Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance. The Novelis Group Code of Conduct is available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf Supplier Code of Conduct is available at: https://www.novelis.com/wp-content/uploads/2024/08/Novelis-Supplier-Code-of-Conduct-08232024.pdf Ethics Hotline: https://app.convercent.com/en-US/LandingPage/918012dd-5b57-ee11-a9a3-000d3ab9f062?_a=1695920313532
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	The Novelis Group Environment, Health, Quality, Safety (EHQS) Policy is communicated internally via annual training and Worker announcements. The Policy is available to external Stakeholders at: https://www.novelis.com/wp-content/uploads/2025/02/EHS-Policy-Guidelines_All-Languages_2024.pdf The Entity has senior management endorsement and support through the provision of resources and regular reviews of its Policies. The Entity has obtained ISO 14001, ISO 9001, and ISO 45001 certifications. The Novelis EHQS Policy is communicated internally via annual training and informational announcements. It is reviewed at a regular frequency, with the last review occurring in 2024.
2.2a-c Leadership	Conformance	The Novelis Chief Executive Officer (CEO) has the corporate responsibility and authority to ensure conformance with the ASI Performance Standard. The Entity's Legal ASI Compliance Officer has the overall responsibility and authority to ensure conformance with the ASI Performance Standard at the site level.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems – Environmental	Conformance	The Entity has documented and implemented an Environmental Management System certified in accordance with ISO 14001. It is planned to also certify to the ISO 50001 Energy Management System in 2026.
2.3b Environmental and Social Management Systems – Social	Conformance	The Entity has established an Environmental Management System certified in accordance with ISO 14001:2015. The Entity has implemented and fulfilled the requirements of an SA 8000 Social Management System.
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has implemented a Responsible Sourcing Policy at a Group level that addresses, addressing environmental, social and governance issues. The Entity has also implemented the Supplier Code of Conduct, available at: https://www.novelis.com/wp-content/uploads/2024/08/Novelis-Supplier-Code-of-Conduct-08232024.pdf</p> <p>Responsible Sourcing Policy is disclosed: https://www.novelis.com/wp-content/uploads/2025/02/Responsible-Sourcing-Policy.pdf</p>
2.5a-g Environmental and Social Impact Assessments	Not Applicable	<p>This Criterion is not applicable to the Entity, as it does not have New Projects or Major Changes to existing Facilities.</p> <p>However, the Entity has implemented systems to conduct internal risk assessments on environmental, social and Human Rights factors in the context with respect to New Projects and system changes. However, there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. The site is located in a highly regulated country where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorisation process (including Human Rights). The Entity has systems in place to manage this effectively.</p>
2.6a-h Human Rights Impact Assessment	Not Applicable	<p>This Criterion is not applicable to the Entity, as it does not have New Projects or Major Changes to existing Facilities.</p> <p>However, the Entity has implemented systems to conduct internal risk assessments on environmental, social and Human Rights factors in the context with respect to New Projects and system changes. However, there have been no New Projects or Major Changes to existing Facilities since the Entity joined ASI. The site is located in a highly regulated country where relevant projects and changes (linked to construction activities) must undergo a thorough analysis and authorisation process (including Human Rights). The Entity has systems in place to manage this effectively.</p>
2.7a-f Emergency Response Plan	Conformance	The Entity has implemented an Emergency Response Plan. External Stakeholders including the community and authorities are involved in regular reviews of the Plan. Regular training sessions are held with the local fire department, the Community and Workers. The Emergency Response Plan is available to Stakeholders upon request.
2.8a-d Suspended Operations	Conformance	As part of the Entity's ISO 14001 and ISO 45001 certified Management System, Emergency Plans have been developed and implemented. The Plans are reviewed periodically by the local fire department and public authorities according to relevant regulations.

CRITERION	RATING	COMMENT
		If the event where business operations are suspended, the regional supply chain assumes responsibility for managing customer deliveries from all possible plants and relocating material and necessary goods.
2.9a-b Mergers and Acquisitions	Conformance	The Entity has a Due Diligence process and is supported by external specialists to reflect environmental, social and governance issues for acquisitions executed by Novelis Headquarters.
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 managed at the Corporate level. There has been no closure, decommissioning or divestment activities at the Entity since joining ASI.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity is part of the incorporated within the Novelis Group Sustainability Reporting framework. The Group has publicly disclosed its governance approach and its Material environmental, social, and economic impacts: https://creative.novelis.com/m/33ac10cbf310b3d0/Novelis-Green-Bond-Report-2024.pdf The Sustainability Report is available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity has undergone several internal and external compliance audits. Legal deviations are published by the district government when they occur. The Entity is incorporated into the Aditya Birla Group Annual Report. There were no significant fines, judgements, penalties or non-monetary sanctions received during the last reporting period, pages 317-318: https://uat.hindalco.com/Upload/PDF/hindalco-annual-report-2023-24.pdf
3.3a-c Payments to Governments	Conformance	The Entity complies with the strict relevant local legislation and has implemented Policies and procedures to conform to this requirement. To prevent Corruption, detailed behaviours are described in the Code of Conduct. Relevant Information are available in the annual financial report: https://investors.novelis.com/sec-filings/all-sec-filings/content/0001304280-24-000024/0001304280-24-000024.pdf?_gl=1*12zmdko*_up*MQ.*_ga*MzA2NzI3NjEuMTc0NTgyNzkxMQ.*_ga_6QYKVB7VNN*MTc0NTgyNzkxMC4xLjEuMTc0NTgyNzkxNy4wLjAUMA
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has attained ISO 14001:2015 and ISO 45001:2018 certification and has implemented appropriate Complaints Resolution Mechanisms. A whistleblowing hotline is in place, refer to: https://app.convercent.com/en-US/LandingPage/918012dd-5b57-ee1l-a9a3-000d3ab9f062?_=1695920313532

CRITERION	RATING	COMMENT
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has prepared Life Cycle Assessments (LCA) for all product groups using the Sphera software tool, which is consistent with the requirements of ISO 14040.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	<p>The Entity contributes Life Cycle Inventory (LCI) data to regional initiatives such as the Aluminum Association and the European Aluminium's Sustainable Development Indicators (SDI). LCAs, which are cradle-to-gate 'Cradle to Gate' Life Cycle Assessments (LCAs), are delivered and provided to customers for their Products upon request.</p> <p>'Cradle to Gate' LCAs, which are cradle-to-gate, are delivered to customers for their Products upon request.</p> <p>LCAs are available for the relevant Products as well as for standard products. Relevant data are available at the European Aluminium SDI: https://european-aluminium.eu/members/novelis</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	<p>The Entity has implemented a working scrap management process. Aluminium Process Scrap is reduced to a minimum and, if scrap is generated, it is 100% recycled or reused.</p> <p>The Entity has a Closed-Loop production. 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	<p>The Entity has established an Aluminium recycling strategy. The set goals within this strategy are fulfilled and thus a continuous increase in the recycling rate is aimed for. The Entity is actively engaged in European initiatives or groups that support and improve national collection rates. The information is included in Novelis Green Bond Report: https://creative.novelis.com/m/33ac10cbf310b3d0/Novelis-Green-Bond-Report-2024.pdf</p> <p>and Sustainability Report: 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's energy use by source is publicly disclosed on an annual basis. Greenhouse Gases (GHG) Emissions KPIs and targets are provided in the annual Sustainability Report (pages 16, 21 and 72) and 'Green Bond Report', available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>https://creative.novelis.com/m/33ac10cbf310b3d0/Novelis-Green-Bond-Report-2024.pdf</p> <p>All data were independently verified before being published.</p>

CRITERION	RATING	COMMENT
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a GHG Emissions Reduction Plans	Conformance	<p>The Entity 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 (KPIs) relating to GHG Emissions and associated targets are provided in the annual Sustainability Report (pages 14 - 16) and 'Green Bond Framework', available at:</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf and</p> <p>https://creative.novelis.com/m/33ac10cbf310b3d0/Novelis-Green-Bond-Report-2024.pdf</p> <p>The Entity has used the ASI GHG Emissions Reduction Pathway methodology to develop emissions reduction curves to 2050 : 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 including the setting of targets at 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 Framework', available at: https://www.novelis.com/wp-content/uploads/2023/09/Novelis-Sustainability-Report-2023.pdf</p> <p>https://www.novelis.com/sustainability/green-bond-report-annual-report-2023</p>
5.4 GHG Emissions Management	Conformance	The Entity has established and implemented an ISO 14001 certified Management System which is audited annually. Projects to reduce GHG emissions are described and implemented, and projects are tracked at both the plant and regional levels. It is also planned to certify ISO50001 in 2026.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	<p>Emissions to Air that may have adverse effects on humans and the environment are measured to ensure limits are achieved under UK law and have been reported in line with the operational permit of the Entity. Emissions are monitored and reduced continuously. Data is disclosed via Sustainability Report, page 68:</p> <p>https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
6.2a-g Discharges to Water	Conformance	The Entity has conducted routine water checks and monitoring to confirm that Discharges to Water are in compliance with the Entity's operational permit. Discharges to Water and the risk of emissions to

CRITERION	RATING	COMMENT
		<p>soil are required to be published in the report of the Emission Protection Officer (EHS Manager). Data are disclosed via the Sustainability Report, page 70: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>The Entity has developed a series of operational procedures relating to several process descriptions regarding the assessment and management of Spills and Leakages. Risks are managed in the Aspects and Impacts Register.</p> <p>The Entity has developed a series of operational procedures relating to process descriptions regarding the assessment and management of Spills and Leakages.</p>
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 1999.</p> <p>The reporting of Spills is regulated, trained, and tested. There are regular visits by the state environmental authorities. There have been no reportable Spills inside/outside the plant since ISO 14001 was implemented in 1999.</p>
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity has implemented a Waste Management Strategy. The waste management goals have been fulfilled and there has been a reduction in the overall waste stream volume. The Strategy has been completed in accordance with the Waste Mitigation Hierarchy.</p> <p>The Entity has publicly disclosed the quantities of Hazardous and Non-Hazardous Waste generated by the Entity and the associated waste disposal methods. Key Performance Indicators (KPIs) and targets are provided in the annual Sustainability Report (page 69) and 'Green Bond Framework', available at: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf and https://creative.novelis.com/m/33ac10cbf310b3d0/Novelis-Green-Bond-Report-2024.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	Conformance	<p>The Entity recycles 100% of white Dross. Black Dross is sent to external local re-processors, who treat the Dross and return it as Aluminium bars.</p> <p>The residue from the Dross re-processors (i.e., a small amount of Aluminium, salt, and Aluminium oxides) is re-used in the secondary Aluminium, building and agricultural/soil stabilisation industries. The Entity conducts regular periodic reviews with each Dross re-processor.</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	The Entity monitors water usage according to local regulations. An overview of the water inflows, various on-site consumption data and various wastewater flows are described and regularly reviewed. The

CRITERION	RATING	COMMENT
		Entity has implemented a water flow diagram, assessed its water-related risks and implemented prevention measures accordingly in their entire Area of Influence.
7.2a-e Water Management	Not Applicable	This Criterion is not applicable to the Entity as water-related risks are identified as low. The Entity has implemented targets for its water management. These targets are regularly reviewed during regulatory authority visits as well as during the annual Environmental Management System review.
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted an Environmental Risk Assessment as part of approval procedures. The risk assessment covers the entire Area of Influence including an assessment of Biodiversity impacts. The permit is available at: https://environment.data.gov.uk/public-register/industrial-installations/registration/EPR-BL6802IU?__pageState=result-all
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable, as there are no Material Biodiversity impacts identified in the risk assessment. If required, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.2a-g Biodiversity Management	Not Applicable	This Criterion is not applicable, as there are no Material Biodiversity impacts identified in the risk assessment. If required, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable, as there are no Material Biodiversity impacts identified in the risk assessment. If required, Biodiversity actions will be included in the Environmental Action Plan and regularly reviewed.
8.4 Alien Species	Conformance	The Entity has taken actions to prevent the introduction of Alien Species. Packaging materials used for export materials (e.g., wooden pallets) are thermally treated (IPCC-treatment) to eliminate the risk of Alien Species introduction to other regions.
8.5a-b Commitment to "No Go" in World Heritage Properties	Not Applicable	This Criterion is not applicable to the Entity, there are no World Heritage sites in the operating environment of the Entity.
8.6a-d Protected Areas	Not Applicable	This Criterion is not applicable to the Entity as it has identified there are no Protected Areas within the Area of Influence according to the State Administration Office website.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity publicly subscribes to the United Nations Guiding Principles (UNGP) and has issued and communicated both its Code of Conduct (Promote a Desirable Work Environment) and Supplier Code of Conduct (Labour and Human Rights), with a commitment to respect Human Rights. Both Codes are available at: https://www.novelis.com/wp-content/uploads/2020/07/Novelis-Code-of-Conduct-2023-English.pdf and https://www.novelis.com/download/novelis-supplier-code-of-conduct</p> <p>The Entity has implemented the Code of Conduct with respect to Human Rights. As part of a risk assessment, the Entity examined the requirements related to Human Rights within its Area of Influence.</p> <p>The Entity has identified there are no significant adverse Human Rights impacts based on a social compliance Self-Assessment (SA 8000). The Entity has not identified any issue that has caused or contributed to adverse Human Rights impacts.</p> <p>The Entity has published a Letter of Commitment to the UN Global Compact, available at: https://ungc-production.s3.us-west-2.amazonaws.com/attachments/Organization/129081/original/Novelis_Inc._-_Letter_of_Recommitment.pdf?1542995069</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures and processes that conform to the women's rights requirements. The Entity has established the program entitled 'Women in Novelis' (WiN). Targets for getting women in leadership and engineering roles have been documented in the Sustainability Report, pages 15 and 50: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p>
9.3a-i Indigenous Peoples	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	This Criterion is not applicable to the Entity, as Indigenous Peoples or their lands, territories and resources are not directly affected by the Entity's operations.
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion does not apply to the Entity, as Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.5a Cultural and Sacred Heritage - Identification	Not Applicable	This Criterion does not apply to the Entity, as no sacred or cultural heritage sites or values within the Entity's Area of Influence are present.
9.5b Cultural and Sacred Heritage - Impacts	Not Applicable	This Criterion does not apply to the Entity, as no sacred or cultural heritage sites or values within the Entity's Area of Influence are present.

CRITERION	RATING	COMMENT
		Indigenous Peoples or their lands, territories and resources are not present or directly affected by the Entity's operations.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable to the Entity, as there is no planned expansion of the entire plant that may have an impact. No resettlements are being considered or have taken place since joining ASI. Indigenous Peoples are not directly affected by the Entity's operations.
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 among its population. The Entity respects, and is very sensitive to the local neighbourhood, the community, and all other interest groups in the vicinity of the work. An evaluation of the interested parties has been undertaken, which confirmed that there are no risks according to Affected Populations.</p> <p>The Novelis Group requests each of its sites to engage with Local Communities in order to respect and support their livelihoods and the Entity actively participates with Local Communities. For further information refer to the Novelis-Neighbour Program: https://www.novelisrecycling.co.uk/corporate-social-responsibility/novelis-neighbour</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity has implemented strict procedures to ensure it does not contribute in any way to Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity has introduced Management Systems that are audited annually by an external certification body, and internal audits are also conducted. To become a Novelis supplier, suppliers must accept the Supplier Code of Conduct and confirm that it complies with the rules as prescribed. Through the Supplier Code of Conduct, the Entity undertakes supplier audits or inspections, and requests self-assessments to ensure supplier compliance.</p> <p>Supplier Code of Conduct: https://de.novelis.com/wp-content/uploads/2024/08/Novelis-Supplier-Code-of-Conduct-08232024.pdf</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity monitors its suppliers through different topics within the Supplier Code of Conduct. These are rated and assigned one total risk number. The calculated risk number informs the Entity whether they have to react or not. Suppliers can be blocked if necessary.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	The Supplier Code of Conduct allows the Entity to conduct audits or inspections, they also request self-assessments to ensure supplier compliance. The Entity monitors its suppliers with information provided to the supplier in an annual supplier evaluation. Risks are recognised at an early stage, allowing the Entity to react on an 'as needs' basis.
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity has internal audits conducted to confirm the effectiveness of Due Diligence practices.</p> <p>The Entity's Due Diligence processes were included in this ASI Performance Standard Certification Audit, which addresses this requirement.</p>

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9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	Annual management reporting of responsible sourcing activities is included in the 2024 Sustainability Report, page 40: 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. Whilst the Entity itself performs most security functions, it 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 metallurgy sector. All Workers are free to join any local union organisations. An infringement of this requirement has not been reported (e.g., Collective Bargaining).
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 there is no need for alternative means of association in the country (United Kingdom) where the Entity is located.
10.2a-c Child Labour	Conformance	The Entity has implemented policies and local regulations to avoid the hiring of Child Labour. The Entity has strict control over any potential Child Labour. The Entity does not use nor support 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 occurs only under supervision and as part of vocational education. The Entity does not use nor support the use of Child Labour and does not engage in or support the Worst Forms of Child Labour.
10.3a-c Forced Labour	Minor Non-Conformance	The Entity neither engages in nor supports the use of Forced Labour and Human Trafficking either directly or through any employment or recruitment agencies, as confirmed by interviews and document review. Human Rights and Forced Labor Policy: https://www.novelis.com/wp-content/uploads/2025/02/Human-Rights-Policy.pdf However, the Modern Slavery Statement has not been formally implemented nor published as a 'stand-alone' document.
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 on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. This is also embedded in the Code of Conduct.
10.5 Communication and engagement	Conformance	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and

CRITERION	RATING	COMMENT
		the resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or Harassment.
10.6a-g Violence and Harassment	Conformance	<p>The Entity does not engage 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.</p> <p>Policy Against Harassment: https://www.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. Working Time, payment and leave are negotiated in Collective Bargaining agreements.</p> <p>The Entity's wage payments are timely, in legal tender and fully documented.</p>
10.8a-c Working Time	Conformance	The Entity complies with Applicable Law and industry standards on Working Time, public holidays and paid annual leave. Working Time is part of the Collective Bargaining agreements and each employment contract.
10.9a-b Informing Workers of Rights	Conformance	The Entity's employees are informed via various media channels and are invited to open meetings by the Works Council for regular updates. Additionally, there is a complaint Management System which is available for all Workers.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System in accordance with ISO 45001. Any identified non-conformances are actioned by the Entity. Internal and external audits are conducted to confirm the effectiveness of the system.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Minor Non-Conformance	<p>Further information on the effectiveness of the OH&S Management System is included in the Sustainability Report, page 15: https://creative.novelis.com/m/6baf8d1849e516e3/Novelis-Sustainability-Report-FY2024.pdf</p> <p>Leading indicators are disclosed via the webpage: https://www.novelis.com/wp-content/uploads/2025/02/OHS-leading-indicators.pdf</p> <p>However, the Entity has not disclosed a comparative analysis with peer businesses and leading practices.</p>
11.2 Employee engagement on Health and Safety	Conformance	Employees are involved in the preparation of risk assessments. Safety Officers have a mandate in the regular OH&S Committees, of which meetings are held on a quarterly basis.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	31 March 2021	Initial Certification Audit – Provisional Certification
1	11 July 2022	Surveillance Audit – Full Certification
2	12 June 2024	Surveillance Audit
3	13 May 2025	Re-Certification Audit and Scope Change; Scope Change to apply ASI Performance Standard V3.1
