

# Novelis

## OH&S Management System Effectiveness Leading Indicators & Comparative Analysis

February 2025

### Leading Indicators

OH&S leading indicators are proactive measures to prevent injuries by addressing risks early. Key indicators at Novelis include reducing top risks through preventive controls, completing incident reports promptly and thoroughly, reporting serious near-misses to identify hidden dangers, and ensuring strong corrective actions to prevent recurrence. Tracking these indicators fosters a strong safety culture, reduces the risk of injury, and improves risk management.

In line with requirement 11.1e of the ASI Performance Standard version 3.1 (April 2023), Novelis has disclosed below OH&S leading indicators for Fiscal Year 2024 (April 1, 2023 – March 31, 2024).

#### Indicators -

- **Risk Reduction %:** Each manufacturing site identifies its top-10 safety risks at the beginning of the Fiscal Year. Sites then complete targeted initiatives to aim to achieve an overall risk reduction of 45% for the identified risks by the end of each Fiscal Year.
- **Hierarchy of Controls (HOC) %:** To ensure the implementation of strong Corrective Actions and Preventative Actions (CAPAs) for injuries and serious near misses, all Novelis sites are expected to develop a least 50% of all CAPAs in the top half of the HOC Pyramid (see Figure 1 below) including engineering controls, substitution, or elimination.
- **Corrective and Preventive Actions (CAPA) Efficiency %:** To ensure prompt and thorough incident reporting, CAPAs for incidents must be reported and completed within required timelines (with a 90% target).
- **Number of Serious Near Misses:** All Novelis sites are required to report serious near miss events to identify hidden hazards, prevent future incidents, and improve workplace safety. Serious near miss reports are shared throughout the Novelis organization.

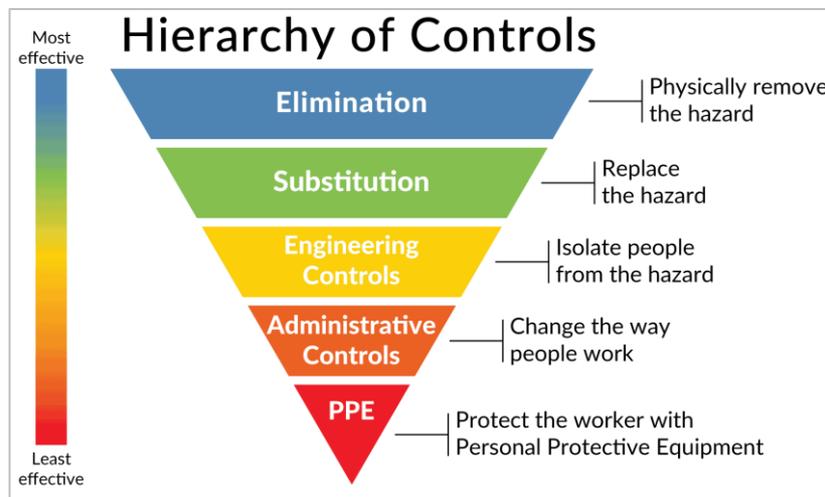


Figure 1: Hierarchy of Controls

Novelis

3550 Peachtree Road NE, Suite 1100, Atlanta, GA 30326

+1 404-760-4000 | novelis.com

ADITYA BIRLA | METALS

# Novelis

## Leading indicator disclosure

Please note that the % Scores represent the % of target attainment.

Region	Plant	Risk Reduction Score (%)	HOC Score (%)	CAPA Score (%)	Serious Near Misses Reported
Asia	Changzhou	58%	100%	100%	0
	Ulsan	70%	50%	100%	2
	Yeongju	65%	100%	100%	2
	Zhenjiang	54%	100%	100%	0
Europe	Bresso	47%	0%	100%	0
	Goettingen	64%	100%	100%	0
	Koblenz	89%	100%	100%	1
	Latchford	70%	83%	100%	5
	Nachterstedt RC	54%	100%	100%	0
	Nachterstedt RO	45%	100%	100%	0
	Norf	63%	73%	100%	2
	Ohle	72%	67%	100%	1
	Pieve	60%	50%	100%	0
	Sierre	65%	67%	100%	2
	Voerde	69%	100%	100%	0
North America	Ashville	72%	57%	100%	1
	Berea	57%	63%	100%	5
	Davenport Casting	46%	67%	86%	5
	Davenport Finishing	50%	100%	100%	0
	Fairmont	50%	89%	100%	8
	Greensboro	69%	100%	100%	2
	Guthrie	42%	50%	100%	7
	Kingston	72%	88%	100%	3
	Lincolnshire	52%	100%	100%	2
	Logan	80%	50%	100%	4
	Oswego	70%	58%	100%	14
	Richmond	55%	100%	100%	1
	Terre Haute	72%	100%	100%	0
	Uhrichsville	59%	60%	100%	2
Warren	47%	100%	100%	1	
South America	Pinda	81%	100%	100%	1
	Santo Andre	70%	100%	100%	0

Novelis

3550 Peachtree Road NE, Suite 1100, Atlanta, GA 30326

+1 404-760-4000 | novelis.com

ADITYA BIRLA | METALS

# Novelis

## Comparative Analysis

### Peer Analysis

Novelis reports on the effectiveness of the OH&S Management System in its annual sustainability report. Novelis benchmarks its safety performance against peer industries, including key competitors within the steel and aluminum sectors. Since 2019, Novelis has benchmarked our safety indicators annually, including Total Recordable Incident Rate (TRIR), Days Away from Work (DAFW) incident rate, Serious Injury and Fatality (SIF) incidents, contractor incidents and best practices. This consistent, comparative approach ensures alignment with recognized industry best practices and enables Novelis to gauge its progress relative to peers. For comparison:

1. Novelis' DAFW incident rate of 0.13\* for Fiscal Year 2024 was below the U.S Bureau of Labor Statistics rate of 0.8 for Calendar Year 2023 (for Alumina and Aluminum Production and Processing). \*(DAFW Incident Count X 200,000)/work hours)
2. Novelis' TRIR of 0.43\* for Fiscal Year 2024 was below the U.S Bureau of Labor Statistics rate of 2.5 for Calendar Year 2023 (for Alumina and Aluminum Production and Processing). \*(TRIR Total Recordable Case Rate as Determined by OSHA Formula)

### Peer Business and Leading Practice Public Comparison Sources

1. [Survey of Occupational Injuries and Illnesses Data : U.S. Bureau of Labor Statistics](#)

- Incidence rates of nonfatal occupational injuries and illnesses by industry and case types, 2023:

Industry	NAICS code	Total recordable cases	Cases with days away from work, job restrictions, or transfer			Other recordable cases
			Total	Cases with days away from work	Cases with days of job transfer or restriction	
Alumina and aluminum production and processing	3313	2.5	1.4	0.8	0.6	1.2
Alumina and aluminum production and processing	33131	2.5	1.4	0.8	0.6	1.2
Alumina refining and primary aluminum production	331313	2.5	1.3	0.7	0.7	1.2
Aluminum sheet, plate, and foil manufacturing	331315	1.3	0.6	0.3	0.4	0.7
Other aluminum rolling, drawing, and extruding	331318	3.0	1.6	1.1	0.5	1.3

Novelis

3550 Peachtree Road NE, Suite 1100, Atlanta, GA 30326

+1 404-760-4000 | novelis.com

ADITYA BIRLA | METALS