

Novelis

OH&S Management System Effectiveness Leading Indicators & Comparative Analysis

August 2026

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 2026 (April 1, 2025 – March 31, 2026).

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.

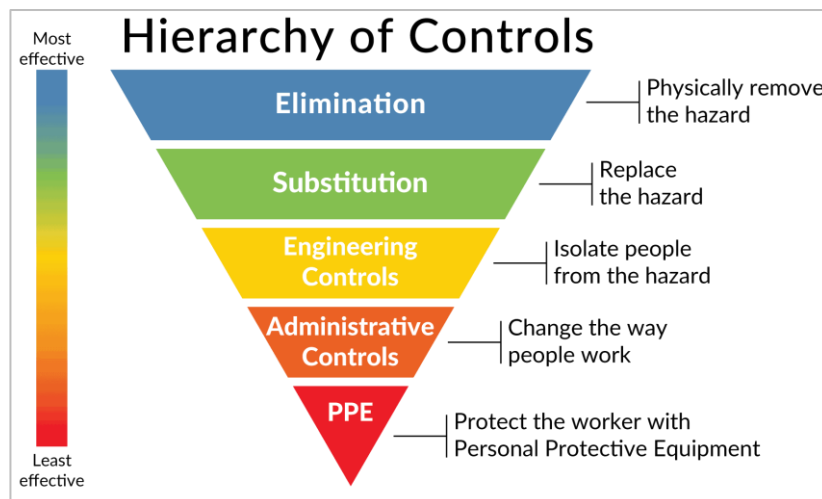


Figure 1: Hierarchy of Controls

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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	45%	100%	100%	0
	Ulsan	65%	100%	92%	1
	Yeongju	56%	0%	100%	1
	Zhenjiang	49%	100%	100%	1
Europe	Bresso	53%	100%	100%	0
	Goettingen	73%	100%	100%	0
	Koblenz	57%	100%	77%	1
	Latchford	55%	60%	57%	2
	Nachterstedt RC	52%	100%	95%	0
	Nachterstedt RO	80%	67%	62%	0
	Norf	56%	33%	86%	2
	Ohle	61%	100%	92%	0
	Pieve	56%	100%	75%	1
	Sierre	47%	100%	100%	0
	Voerde	28%	100%	92%	0
North America	Ashville	55%	100%	92%	1
	Berea	48%	50%	71%	1
	Davenport Casting	49%	50%	92%	7
	Davenport Finishing	73%	100%	100%	0
	Greensboro	61%	100%	92%	1
	Guthrie	26%	69%	93%	7
	Kingston	60%	100%	100%	1
	Lincolnshire	55%	100%	77%	1
	Logan	83%	67%	68%	6
	Oswego	33%	63%	100%	7
	Terre Haute	38%	100%	91%	1
	Uhrichsville	57%	100%	83%	5
	Warren	50%	100%	91%	1
South America	Pinda	2%	100%	94%	9
	Santo Andre	9%	100%	100%	0

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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 0.10* for Fiscal Year 2026 was below the U.S Bureau of Labor Statistics rate of 0.8 for Calendar Year 2024 (for Alumina and Aluminum Production and Processing). *(DAFW Incident Count X 200,000)/work hours)
2. Novelis' TRIR of 0.43* for Fiscal Year 2026 was below the U.S Bureau of Labor Statistics rate of 2.6 for Calendar Year 2024 (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, 2024:

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	2.6	1.7	0.8	0.9	0.9
Alumina and aluminum production and processing	33131	2.1	1.3	0.6	0.7	0.8
Alumina refining and primary aluminum production	331313	2.9	2.0	1.0	0.9	0.9
Aluminum sheet, plate, and foil manufacturing	331315	1.5	1.5	0.4	0.4	0.6
Other aluminum rolling, drawing, and extruding	331318	3.4	2.4	1.1	1.2	1.0

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