

Novelis Supplier Code of Conduct



Introduction

Novelis is the world's largest producer of rolled aluminum and the global leader in aluminum recycling. By delivering a material advantage, spurring innovation and recreating a sustainable future, we transform aluminum into something special. As part of our long-term sustainability approach, we strive to be responsible in all aspects of our business. Our values are reflected by our employees, products, interaction with our communities and supply chain.

Our reputation depends on every Novelis employee acting honestly and with integrity, as well as our supply chain partners conducting themselves in the same manner. This Novelis Supplier Code of Conduct ("Code") outlines what we Novelis' expect you, as our Supplier to meet the sustainability standards by which we measure ourselves. Every Novelis Supplier should comply with the terms of this Code and drive compliance in all its business operations.

There are multiple benefits to having a Supplier code of conduct, not only for our company but also for our Suppliers. This should help all businesses within the supply chain meet a common level of governance, management, and transparency. If effectively implemented, you will be able to:

- Better understand and manage the environmental, economic, and social risks of your business.
- Demonstrate to consumers and other stakeholders' ethical behavior and good governance.
- Protect Novelis and your company's reputation and brand value.
- Identify and mitigate risk across your supply chain and in your operations to reduce costs of energy, inputs and transportation, improve health and safety practices, and increase labor productivity; and
- Create more sustainable products and services to both meet your customers and business partners' growing needs and remain competitive in the changing market.

Novelis

Responsible Business Approach

With operations and customers all over the world, Novelis has a truly global presence that requires a global approach. We work with our customers to create products that are useful to society across their life cycle, have a low carbon footprint, and ensure End-of-Life recyclability. We strive to ensure our manufacturing systems are managed in a sustainable way, continuously improving our environmental, social, and economic performance. [As such, we commit to the Ten Principles of the United Nations Global Compact, whose primary goal is to promote responsible corporate citizenship and advance sustainable development worldwide.](#)

The Code defines the minimum requirements as well as clear expectations of Suppliers to Novelis. Compliance with the minimum requirements outlined in these standards is a binding part of Novelis terms and conditions.



Novelis is a signatory to the United Nations Global Compact. Through this initiative, Novelis commits to the Ten Principles of the UN Global Compact, which address human rights, labor standards, environmental protection, and anti-corruption ideals. The Global Compact principles are shown below and are a critical component of the Novelis Supplier Code of Conduct. For more information on the UN Global Compact, go to www.unglobalcompact.org/

The Ten Principles of the United Nations Global Compact

Human Rights

- Principle 1** Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2** Make sure that they are not complicit in human rights abuses.

Labor

- Principle 3** Businesses should uphold the freedom of association and the effective recognition of the rights to collective bargaining,
- Principle 4** The elimination of all forms of forced and compulsory labor,
- Principle 5** The effective abolition of child labor; and
- Principle 6** The elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7** Businesses should support a precautionary approach to environmental challenges.
- Principle 8** Undertake initiatives to promote greater environmental responsibility, and
- Principle 9** Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- Principle 10** Businesses should work against corruption in all its forms, including extortion and bribery.

Legal and Regulatory Compliance

Novelis is committed to ensuring that our global operations follow government regulatory and legal requirements in each country in which we operate and that we serve. For example, the German Supply Chain Due Diligence Act (German SCDDA), Dodd-Frank Act related to conflict minerals, Uyghur Forced Labor Prevention Act (UFLPA) and others. Note: Selected details can be found in Appendix 1 (for example German SCDDA). Others can be found online at their respective regulatory websites.

Novelis Suppliers are required to:

- Comply with the laws and regulations of the countries in which they operate.
- Not tolerate any forms of corruption, including extortion and bribery, as well as any payment or benefit that may influence government officials, other regulatory bodies or violate the law.

Labor and Human Rights

Novelis does not tolerate any form of human rights violation including forced or compulsory labor. We require compliance with labor and human rights due diligence obligations.

Novelis Suppliers are required to:

- Ensure that they do not commit and are not involved in any human rights violations.
- Promote equal opportunities for and treatment of its employees.
- Respect the personal dignity, privacy, and rights of everyone.
- Not force any person to work against his or her will; Refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, sexual or personal harassment or unlawful discrimination.
- Prohibit behavior, including gestures, language, or physical contact, that is sexual, coercive, threatening, abusive or exploitative.
- Provide fair remuneration and guarantee at least the applicable national statutory minimum wage.
- Comply with the maximum number of working hours set forth by applicable laws.
- Recognize, to the extent legally permitted, the right of free association of employees, and not discriminate in favor of or against members of employee organizations or trade unions.

Child Labor

Novelis does not tolerate any form of child labor. Suppliers should not employ workers younger than the legally permissible age of employment in any country or local jurisdiction in which it operates. If there is no designated legally permissible age of employment, Novelis will not employ workers under the age of 16. Novelis expects its Suppliers to adhere to these limitations in support of the prohibition against child labor.

Health & Safety

The health and safety of our employees is a priority in our daily business and operations, whether in our offices or our plants, and we expect our Suppliers to also make this a priority for their own employees and supply chain.

Novelis Suppliers are required to:

- Advance the health and safety of its employees.
- Control hazards and take precautionary measures against accidents and occupational diseases.
- Provide training to help ensure that its employees are educated in health and safety issues.
- Manage and address occupational health and safety issues with appropriate systems and processes.

Environmental Protection

At Novelis, our operations adhere to global standards in managing the environmental impacts of our company and its operations. We also understand the importance of finding innovative ways to improve our greenhouse gas emissions, reduce energy and water usage, increase the recycled material in our products to reduce landfill waste. We expect our Suppliers to have the necessary systems to minimize the impact of their operations and products on the environment and comply with government regulations. The Supplier assures compliance with environmental due diligence obligations and to appropriately addressing within the supply chain.

Novelis Suppliers are required to:

- Act in accordance with the applicable local and international legal standards governing environmental protection.
- Minimize environmental impacts and make continuous improvements in environmental protection, specifically with respect to waste, water use, air emissions, energy use, natural resources use and disposal of hazardous materials.
- Manage and address environmental issues with appropriate systems and processes.
- Provide environmental and other sustainability data to Novelis when requested.

Risk Management

The Supplier shall establish and implement adequate and effective risk management processes to identify and prioritize environmental and human rights risks in their operations and supply chain. Further, our suppliers commit to speedily and effectively dealing with any such breaches once identified.

Novelis Suppliers are required to:

- Establish an appropriate complaint mechanism to enable persons to raise concerns about the above-mentioned human rights and environmental risks, as well as violations of human rights and environmental obligations that have arisen because of the Supplier's economic activities or in their supply chain.
- Inform Novelis immediately about breaches in their supply chain related to the risks outlined in this Code, as far as such breaches have an impact on Novelis, and work on remedy all such violations, if necessary, with support of Novelis.

Supply Chain

While we as a company can strive to implement the standards outlined in this Code within our own operations and require our Suppliers to do the same, we also ask that your company requires its Suppliers to adopt similar standards. By seeking to influence the adoption of responsible guidelines and standards within your supply chain, we can work together to make a positive impact on society.

Novelis Suppliers are required to:

- Use reasonable efforts to promote compliance with this Novelis Supplier Code of Conduct within their supply chain
- Comply with the principles of non-discrimination with regard to Supplier selection and treatment.

Application and Enforcement

The Novelis Supplier Code of Conduct applies to all Suppliers of Novelis Inc. and its subsidiaries and affiliates to the extent permitted by applicable law.

Return a copy of Supplier Acknowledgement and Adherence to Novelis Supplier Code of Conduct to Novelis, signed by an authorized representative of your company, to confirm you have received, read, and commit to comply and adhere to this Code.

Novelis will ensure Supplier compliance to this Code through:

Self-assessment:

The Supplier may be required to do a self-assessment to make sure that it follows this Novelis Supplier Code of Conduct. Upon Novelis' request, the Supplier will inform us, in accordance with the need-to-know principle, about the serious risks and violations the Supplier has identified, and the measures Supplier has taken and whether, when and to what extent these measures were effective. Novelis reserves the right to review and update the measures described in this section as necessary.

Questionnaire/survey:

Upon Novelis' request, the Supplier must provide information and complete questionnaires in accordance with Novelis specifications.

Supplier audits:

Novelis is also entitled to carry out or have carried out an on-site review of the measures (audit) at reasonable intervals by a suitable auditor selected by Novelis. Novelis will announce each audit at least 10 working days before it is to be carried out. For this purpose, the Supplier shall grant Novelis or its auditor access to their business premises during normal business hours and access to all documents, data and systems relating to the measures to the extent necessary.

Certifications:

The Supplier shall obtain and maintain certifications in accordance with our requirements.

If the Supplier violates standards and/or obligations arising from this Code of Conduct, we reserve the right to temporarily suspend or terminate the business relationship or parts thereof, until the violation has been remedied. In the event of suspension, Novelis may also withdraw from concluded contracts if the breach is not remedied within a reasonable period of time to be set by Novelis

The latest version of the Supplier Code of Conduct and additional information that may be useful for you to verify/ ensure compliance to this Code is available at: [novelis.com/Suppliers](https://www.novelis.com/Suppliers)

Supplier Acknowledgement and Adherence to Novelis Supplier Code of Conduct

The undersigned acknowledges that it has read and understands the Novelis Supplier Code of Conduct and agrees to adhere to the provisions of the Novelis Supplier Code of Conduct.

Supplier Name: _____

Signer's Name and Title: _____

Signature: _____

Date: _____

Appendix 1

German Supply Chain Due Diligence

Labor and Human Rights

Novelis expects its Suppliers to comply with human rights due diligence obligations and to address them appropriately within the Suppliers' supply chain. The subject of the human rights due diligence obligations are the risks as described in the Supply Chain Due Diligence Act (SCDDA) and in the questionnaire for the report of the Federal Office of Economics and Export Control (BAFA) which include:

- Prohibition of child labor
- Prohibition of forced labor and all forms of slavery
- Disregard for occupational health and safety and work-related health hazards
- Contempt for freedom of association and right to collective bargaining
- Prohibition of unequal treatment in employment
- Prohibition of withholding fair wages
- Prohibition of unlawful forced eviction and the prohibition of unlawful seizure of land, forests, and waters in the event of their acquisition, development, or other use.
- Prohibition on hiring or using private/public security forces that may cause interference due to lack of instruction may lead to adverse effects due to lack of instruction or control
- The prohibition of any action or breach of duty going beyond the foregoing. Omission which is directly likely to have a particularly serious effect on a protected legal position (arising from the human rights conventions within the meaning of § 2 par. 1 SCDDA) and the unlawfulness of which is obvious upon a reasonable assessment of all the circumstances under consideration.

Suppliers shall cooperate with Novelis and support Novelis to the best of their ability, at their own expense, in all measures required by the SCDDA in relation to the above-mentioned human rights, in particular by participating in and conducting their own training and education, participating in and conducting their own inspections, participating in and conducting their own joint initiatives and cooperating in and implementing corrective action plans with us.

Environmental Protection

Novelis expects its Suppliers to comply with environmental due diligence obligations and to address them appropriately within the Suppliers' supply chain. The subject of the environmental due diligence obligations are the risks as described in the Supply Chain Due Diligence Act (SCDDA) and in the questionnaire for the report of the Federal Office of Economics and Export Control (BAFA):

- Destruction of the natural basis of life through environmental pollution or harmful soil change
- Unlawful deprivation of land, forests and water or forced eviction
- Prohibited manufacture, use and/or disposal of mercury (Minamata Convention)
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of POPs-containing waste
- Prohibited import/export of hazardous waste as defined by the Basel Convention

Suppliers shall cooperate with Novelis and support Novelis to the best of their ability, at their own expense, in all measures required by the SCDDA in relation to the above-mentioned environmental risks, in particular by participating in and conducting their own training and education, participating in and conducting their own inspections, participating in and conducting their own joint initiatives and cooperating in and implementing corrective action plans with us.

Risk Management

Novelis expects its Suppliers to establish and implement adequate and effective risk management processes and risk analyses to identify, weigh and prioritize risks or breaches related to human rights and environmental risks protected by the SCDDA and take appropriate measures to identify and prevent, stop, minimize and, where necessary, compensate for such risks or breaches, where the Supplier has caused or contributed to such risks or breaches through economic activity.

Note: Details of the German Supply Chain Due Diligence Act can be found here:

<https://www.bmz.de/resource/blob/154774/lieferkettengesetz-faktenpapier-partnerlaender-eng-bf.pdf>