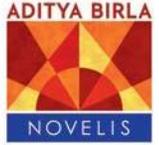


Novelis Supplier Code of Conduct



• Introduction

Novelis Inc. (“Novelis”) is committed to leading the industry in sustainable and responsible sourcing practices. As a global leader in aluminum rolling and recycling, Novelis expects its suppliers to uphold the highest standards of ethical conduct, human rights, environmental responsibility, and business integrity.

This Supplier Code of Conduct (the “Code”) outlines the minimum requirements that all suppliers, contractors, and business partners must meet when conducting business with Novelis. It is based on internationally recognized standards, including the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, International Labour Organization (ILO) Conventions, the OECD Due Diligence Guidance for Responsible Business Conduct, Aluminum Stewardship Initiative (ASI) and other applicable industry best practices.

Further, 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.

• Scope and Applicability

This Code applies to all direct and indirect suppliers providing goods and services to Novelis worldwide. Suppliers are responsible for ensuring compliance throughout their supply chains, including subcontractors and raw material providers. This document defines the minimum requirements and expectations of suppliers. Compliance with the minimum requirements outlined in these standards is a binding part of Novelis Terms and Conditions.

Novelis suppliers are expected to use reasonable efforts to promote compliance with this Novelis Supplier Code of Conduct within its supply chain.

Novelis

• Labor and Human Rights

Novelis expects suppliers to respect and uphold fundamental human rights, including:

- Prohibiting forced labor, child labor, and all forms of slavery and human trafficking in all forms.
- Ensuring fair wages, working hours, and benefits in accordance with applicable laws and industry standards.
- Providing a safe and healthy working environment for all employees.
- Supporting freedom of association and collective bargaining rights.
- Prohibiting discrimination, harassment, and any form of workplace abuse or unequal treatment in employment.
- Ensuring ethical recruitment practices, including no withholding of worker identification documents.
- Prohibition on hiring or using private/public security forces that may lead to adverse effects due to lack of instruction or control.

• Health and Safety

Novelis expects suppliers to provide a safe and healthy work environment for all employees, comply with applicable health and safety laws and regulations and implement best practices to prevent workplace injuries and illnesses. This includes:

- Implementing and maintaining a health and safety management system, such as ISO 45001.
- Providing appropriate personal protective equipment (PPE) to workers.
- Conducting regular safety training and emergency preparedness drills.
- Maintaining clean and safe work facilities, including proper ventilation and ergonomics.
- Identifying and mitigating occupational health risks, including exposure to hazardous materials.
- Encouraging workers to report unsafe conditions without fear of retaliation.

• Environmental Responsibility

Novelis is committed to minimizing environmental impact and expects suppliers to implement responsible environmental practices, including:

- Maintaining an environmental management system, such as ISO 14001.
- Reducing greenhouse gas (GHG) emissions.
- Implementing energy, water, and resource efficiency measures.
- Minimizing waste and promoting circular economy principles.
- Ensuring responsible chemical and hazardous material management.
- Protecting biodiversity and preventing deforestation and land degradation.
- Prohibiting unlawful violation of land rights
- Prohibiting manufacture, use and/or disposal of mercury (Minamata Convention)
- Prohibiting production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of POPs-containing waste
- Prohibit import/export of hazardous waste as defined by the Basel Convention

• Business Ethics and Compliance

Novelis enforces a zero-tolerance policy on corruption, bribery, and fraudulent business practices. Suppliers must:

- Comply with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA).
- Avoid conflicts of interest and maintain fair competition practices.
- Respect intellectual property and data privacy rights.
- Accurately report financial transactions and business dealings.
- Establish a whistleblower mechanism to report ethical concerns without retaliation.

• Responsible Sourcing of Materials

Suppliers must ensure that materials provided to Novelis are responsibly sourced, conflict-free, and meet ethical supply chain requirements. This includes:

- Conducting due diligence on raw material sourcing, especially for metals and minerals (e.g., aluminum, 3TGs, cobalt, mica).
- Complying with the OECD Due Diligence Guidance for Responsible Supply Chains.
- Providing traceability and documentation upon request.
- Avoiding sourcing from conflict-affected or high-risk areas without adequate risk mitigation.

• Monitoring and Compliance

Novelis reserves the right to conduct audits, assessments, and reviews to ensure compliance with this Code. Suppliers must provide full transparency and cooperate with any due diligence efforts, including:

- Submitting required documentation and completing self-assessments upon request.
- Allowing site inspections and third-party audits as deemed necessary.
- Implementing corrective actions for identified compliance gaps.
- Cascading these requirements throughout their supply chain.

• Reporting Violations and Continuous Improvement

Novelis encourages all stakeholders to report any suspected violations of this Code through its third-party-operated Ethics Hotline. Novelis does not tolerate retaliation against anyone who reports violations in good faith.

Novelis is committed to continuously improving responsible sourcing practices and expects suppliers to strive for ongoing enhancements in sustainability, ethical business conduct, and social responsibility.

• 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 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.

Policy Owner: Global Responsible Sourcing

Effective Date: December 1, 2023

Revision Date: April 28, 2025

• Application and Adherence

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 with and adhere to this Code.

Novelis will ensure supplier compliance with this Code through:

- Self-assessment:

The supplier may be required to conduct 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.

- 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. 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 to be set by Novelis.

Suppliers shall cooperate with Novelis and support Novelis to the best of their ability, at their own expense, 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

The latest version of the Supplier Code of Conduct and additional information that may be useful for you to verify/ensure compliance with this Code is available at: 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: _____