

Policy Against Harassment



PURPOSE

It is the intent of Novelis to provide a work environment free from harassment. Novelis strictly prohibits any form of harassment, including harassment based on gender, race, national origin, age, religion, color, sexual orientation, gender identity and/or expression, national origin, marital status, real or perceived mental or physical disability or handicap, military or veteran status, citizenship, marital status, pregnancy, medical condition, genetic information or any other legally protected category. In order to achieve this goal and in compliance with federal, state, and local laws and regulations regarding discrimination and harassment, we have established the following policy.

SCOPE AND APPLICABILITY

This is a global policy. This policy applies to Novelis Inc. and its subsidiaries and affiliates (hereinafter collectively and each individually “Novelis” or “Company”) and to all our employees, officers, directors, and agents, unless otherwise covered by a collective bargaining agreement or otherwise subject to possible participation rights of Works Council or other national employee representative.

This policy also applies to all employee interactions with other employees, contractors, vendors, customers, visitors, and the public, candidates seeking employment with the Company, and all other individuals, if those interactions have a connection to the employee’s work for the Company. If harassment occurs on the job, whether on or off the premises or by someone not employed by Novelis, the procedures in this policy should be followed as if the harasser were an employee of Novelis.

This policy is not intended to be and does not create a contract (express or implied) on the part of Novelis and its employees.

DEFINITIONS

Harassment includes conduct that unreasonably interferes with an individual’s work or ability to perform duties by creating an intimidating, hostile or offensive working environment. It can include, but is not limited to:

- verbal abuse or insults;
- bullying;
- gestures or physical contact;
- display or circulation of degrading or derogatory pictures or materials; or

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- sending emails or other electronic communication, including social media postings, that contain discriminatory and/or harassing content.

POLICY

Our employees are prohibited from engaging in any conduct that may be considered harassment and/or encouraging any other person to be harassed, while performing his or her duties.

Employees are expected to always act professionally and must avoid conduct of any kind that disrupts or interferes with another person's work performance and/or work environment. Harassment is a form of misconduct that undermines the integrity of the employment relationship. Each manager and supervisor is responsible for maintaining a work environment free of harassment and ensuring mutual dignity and respect among employees.

Sexual Harassment

Novelis will not tolerate any form of sexual harassment, regardless of whether it is verbal, physical, visual, online or otherwise. Novelis takes every reasonable step to prevent discrimination and harassment from occurring within the Company. Sexual harassment includes unwelcome sexual advances, requests for sexual favors and other physical or verbal conduct of a sexual nature when:

- submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or a basis for employment decisions affecting the individual; or
- such advances, requests or conduct have the purpose effect or effect of interfering with an individual's work performance by creating an intimidating, hostile, humiliating or offensive work environment.

Sexual harassment is not limited to inappropriate behavior from a male employee towards a female employee or a supervisor toward a subordinate. Victims of sexual harassment can be a man, woman, supervisor, or employee. The harassment may come from a manager or supervisor who does not directly supervise the victim. It can also come from a co-worker, a client, or a vendor. A harasser may also be the same sex as the victim.

Harassment Complaint Procedure

Any employee who believes they have experienced harassment, or has witnessed harassment by any employee, vendor, client or other person in connection with his/her employment, must report the incident immediately to his/her supervisor or manager. If the employee feels uncomfortable reporting the harassment to his/her supervisor or manager, the employee must immediately report the matter to another member of management, a Human Resources representative, or contact the Novelis Ethics Hotline. Novelis will respond to and investigate such information and take appropriate corrective action.

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Investigation of Harassment Complaint

All reported incidents of harassment will be investigated for the purpose of determining the facts, whether it constituted harassment, and what remedial actions, if any, are appropriate. The investigation of a reported incident will be conducted as follows:

- All investigations will be conducted in a confidential a manner, if possible;
- The complaint will be written up and signed by the complainant;
- Both the complainant and the alleged harasser will be interviewed as part of the investigation, and both will be informed of the non-retaliation provisions of this policy;
- The complainant will be asked for corroborating evidence, and corroborating witnesses may be interviewed;
- The investigator's notes will be kept confidential and not included in any personnel file;
- Generally, the investigator will report to the Regional HR leadership and any other appropriate stakeholder, and the Company will, as and if appropriate, take action, including to stop any offending conduct, to preclude future offending conduct, and to restore workplace relations; and
- The complainant will be informed when the investigation is complete.

Any individual who the Company determines has made a claim of harassment in “bad faith” may be disciplined up to and including termination.

Retaliation is Prohibited

Retaliation against employees, vendors or clients who in good faith report harassment, object to harassment, or assist in a harassment investigation, is prohibited.

Any employee who believes he/she has been retaliated against for filing a complaint or participating in an investigation should report it to a supervisor, a Human Resources representative, or contact the Novelis Ethics Hotline.

Violations of this Policy

If the investigation determines any employee, regardless of position or title, has subjected an individual to harassment, discrimination, or retaliation in violation of this policy, they will be subject to discipline, up to and including termination of employment.

Roles and Responsibilities

Human Resources: It is the responsibility of the Human Resources Department to implement and follow this policy.

Managers and Supervisory Staff: All managers and supervisory staff share responsibility for the implementation of this policy.

All Employees: It is the responsibility of all employees to comply with this policy and report any violations.

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Compliance and Enforcement

The requirements outlined in this policy must be followed by the Human Resources Department, as well as all managers and supervisory staff. All employees of Novelis, as a condition of employment and in accordance with the Company's Code of Conduct must comply with this policy.

This policy is not intended to restrict communications or actions protected or required by state or federal law.

RELATED POLICIES

- Novelis Code of Conduct
- Fraternization Policy
- Whistleblower Policy

POLICY CONTACT

If you have any questions about this policy, please contact Novelis Human Resources via email at askhr@novelis.com.

VERSION HISTORY

Version Number	Implemented By	Revision Date	Approved By	Approval Date	Description of Change
1.0	Human Resources	August 1, 2012	N/A	N/A	Policy establishment
1.1	Human Resources	October 24, 2024	Sham Das	January 15, 2025	Updated classification from Standard to Policy, Minor content changes, Format update to new Legal template

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