



Novelis Responsible Minerals Sourcing Statement

I. Introduction

Novelis is committed to leading the industry in sustainable practices, including the responsible sourcing of goods and services throughout our supply chain. Novelis extends this commitment to our suppliers, as further detailed in the Novelis Responsible Sourcing Policy and Novelis Supplier Code of Conduct.

II. Purpose

Novelis is committed to sustainable and responsible sourcing of various extracted minerals from around the world that ultimately become incorporated into our products. Novelis supports the human rights goals reflected in the adoption of conflict mineral due diligence, reporting, and disclosure requirements included in the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“SEC Conflict Minerals Rules”).

Novelis understands that certain minerals predominantly originate from Conflict Affected and High-Risk Areas (“CAHRAs”), including, but not exclusive to, the Democratic Republic of Congo (“DRC”) and its adjoining countries, where there are heightened concerns that proceeds from minerals could be used to contribute to armed conflict or human rights abuses. The minerals tin, tungsten, tantalum, and gold (“3TG Minerals”) that are extracted or processed in certain geographies have become commonly referred to as “conflict minerals”, in particular, due to the potential that proceeds of such 3TG Minerals may be used to fund longstanding armed conflicts in DRC and its adjoining countries. Novelis seeks to avoid harming communities in CAHRAs through de facto embargoes of minerals sourced from those areas. Additionally, Novelis monitors inputs of cobalt and mica due to the conditions under which they are mined.

Further, although aluminum is not directly listed among the typical conflict minerals, the components and materials used in its production and enhancement may intersect with these high-risk supply chains. Therefore, Novelis diligently applies the principles of the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#) (“OECD Guidance”) to our entire supply chain.

Novelis has established a process to facility compliance with the applicable laws mandating disclosure of 3TG Minerals. Novelis is committed to making reasonable efforts to:

- Exercise due diligence with relevant suppliers in accordance with the OECD Guidance.
- Collaborate with customers, suppliers, and industry associations to help develop long term solutions to enable responsible sourcing of 3TG materials and any originated in CAHRAs.
- Require suppliers to provide 3TG source information reasonably requested by Novelis necessary to support its due diligence and reporting obligations under the SEC’s Conflict Minerals Rules, as well as, to notify Novelis immediately should a product supplied to Novelis contains 3TG Minerals originating in the DRC or surrounding countries.



- Participate or join responsible sourcing initiatives to improve the upstream communities in our supply chain.
- Encourage the smelters and refiners in our supply chain to pass the Responsible Minerals Assurance Process (RMAP) and conform to an independent third-party responsible materials sourcing program, wherever possible.

Our suppliers are also expected to source materials that are conflict-free and that are sourced from socially responsible suppliers that do not directly or indirectly finance conflict or may be linked to human rights abuses. We require our suppliers to exercise due diligence on the source and chain of custody of materials, and to provide documentary evidence upon request.

Suppliers who are not able to provide adequate information about the source of any Conflict Minerals or other minerals of concern in the products supplied to Novelis shall be evaluated by Novelis's Global Procurement department and may be denied future Novelis business. Furthermore, our Supplier Code of Conduct provides that we may terminate any agreement with any supplier that cannot eliminate products containing Conflict Minerals or other minerals, the supply chain of which funds or supports armed conflict or human rights abuses.

III. Continuous Improvement

Novelis will review and update its responsible sourcing practices and documentation regularly to adapt to regulatory changes, industry best practices and stakeholder requirements.

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