



Novelis Responsible Sourcing Policy

PURPOSE

Novelis Inc. and its subsidiaries and affiliates (hereinafter collectively and each individually “Novelis”) are committed to leading the industry in sustainable practices, including the responsible sourcing of goods and services throughout our supply chain.

The objective of this Responsible Sourcing Policy (the “Policy”) is to communicate Novelis’ position and expectations with respect to the responsible sourcing of materials in our own operations as well as along our entire supply chain (the “Responsible Sourcing program”). The Policy promotes engagement and standardized communication with our suppliers.

SCOPE

The scope of the Policy includes the sourcing of all materials purchased by Novelis global and regional procurement, and related services. The expectations set forth in this Policy apply to all direct and indirect suppliers in Novelis business globally.

APPLICABILITY

This Policy and other relevant policies and procedures set a minimum standard that must be followed. Where local laws, regulations or rules impose a higher standard, Novelis is committed to comply with the respective requirements and to update this Policy in the next review cycle to reflect these. Novelis further expects our suppliers to comply with such local laws, regulations, or rules.

PURPOSE

Novelis’ supply chain is broad and complex. We source tens of thousands of different materials from an extensive network of domestic and international suppliers and distributors. We recognize that our footprint extends beyond our own operational control and that, to make a positive impact, we must influence our entire value chain.

Our Responsible Sourcing program seeks to ensure ethical practices in our supply chain and to reduce the impact to the environment to the extent possible.

At the core of our Responsible Sourcing program, we embrace industry partnerships, customer engagements and customized solutions to address complex supply chain sourcing challenges. We rely on strong relationships with our suppliers to share responsibility in building transparent and ethical supply chains together.

RESPONSIBLE SOURCING AT NOVELIS

We are committed to supplying compliant, consistent, safe, responsibly sourced and sustainable products. Novelis considers materials as responsibly sourced when they meet our social and environmental



expectations (as stated in this Policy) or for which continuous improvement plans are in place for suppliers to work on.

This Policy is guided by the **Ten Principles of the United Nations (U.N.) Global Compact**, the **U.N. Guiding Principles on Business and Human Rights**, the **International Labor Organization (ILO) conventions**, the **Universal Declaration of Human Rights** and the **OECD Due Diligence Guidance for Responsible Business Conduct**.

Novelis expects our suppliers to:

1. Comply with Novelis' Supplier Code of Conduct, which sets forth the basic requirements a vendor must meet in order to maintain a business relationship with Novelis. The Supplier Code of Conduct is available in multiple languages on Novelis' website at <https://www.novelis.com/suppliers/>.
2. Source materials that are conflict-free and that are sourced from socially responsible suppliers, particularly metals and minerals (including but not limited to 3TGs, cobalt and mica). We require our suppliers to exercise due diligence on the source and chain of custody of materials, and to provide documentary evidence upon request.
3. Respect the human rights of workers, local communities and other relevant stakeholders, and prevent and address adverse human rights impacts linked to their business activities, in accordance with the UN Guiding Principles on Business and Human Rights. Suppliers should implement a management system for human rights and working conditions that includes the following:
 - 3.1. **Child Labor/Labor and Young Workers:** Suppliers must observe the minimum employment age in their business activities and throughout their supply chain in accordance with the ILO Minimum Age Convention and shall ensure that child labor is not tolerated in any form.
 - 3.2. **Wages and Benefits:** Suppliers must provide their workers with remuneration in accordance with applicable regulations and prevailing industry practices; such remuneration should be adequate to cover basic needs and enable a decent standard of living for the workers and their families, which includes respecting minimum wages, overtime compensation, medical leave and government-mandated benefits.
 - 3.3. **Working Hours:** Suppliers must comply with local laws and collective bargaining agreements (where applicable) regarding working hours, or should comply with the ILO Standards on Working Time in the absence of relevant local regulations.
 - 3.4. **Modern Slavery:** Suppliers must prohibit any forms of forced, bonded or compulsory labor, including human trafficking. Supplier must ensure that the good and services they provide are not produced using any form of forced labor.
 - 3.5. **Ethical Recruiting:** Suppliers must not mislead or defraud potential workers about the nature of the work, ask workers to pay recruitment fees, and/or confiscate, destroy, conceal, and/or deny access to worker passports and other government-issued identity documents. Workers must receive a written contract or employment notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities.
 - 3.6. **Freedom of Association and Collective Bargaining:** Suppliers should provide a working environment that encourages workers to communicate openly with management regarding



working conditions and management practices without fear of reprisal, intimidation or harassment. Suppliers should respect worker rights to associate freely, to join or not join labor unions, bargain collectively, seek representation and join workers' councils.

- 3.7. Non-Discrimination and Harassment: Suppliers cannot tolerate any form of discrimination or harassment in respect of employment and occupation and should strive to provide equal employment opportunities regardless of worker or applicant characteristics such as age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information or marital status.
 - 3.8. Women's Rights: Suppliers should strive to provide equal opportunity in employment and commit to equal pay for equal work.
 - 3.9. Diversity, Equity, and Inclusion: Suppliers should strive to develop and promote inclusive cultures where diversity is valued and celebrated, and everyone can contribute fully and reach their full potential. Suppliers should encourage diversity in all levels of their workforce and leadership, including boards of directors.
 - 3.10. Rights of Minorities and Indigenous Peoples: Suppliers must respect the rights of local communities to decent living conditions; education, employment, social activities; and the right to Free, Prior, and Informed Consent (FPIC) to developments that affect them and the lands on which they live, with consideration for the presence of vulnerable groups.
 - 3.11. Land Rights and Forced Eviction: Suppliers should avoid forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.
 - 3.12. Private or Public Security Forces: Suppliers should use its best efforts to commission or use adequately trained private or public security forces to protect the business project in order to prevent the deployment of the security forces that may lead to violations of human rights.
4. Provide workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for safety and occupational health. Suppliers should implement a management system for a safe and healthy working environment that includes the following:
 - 4.1. Workspace: Suppliers should provide a working environment that meets or exceeds local and national safety, occupational health, and fire safety legislation, in addition to encouraging remote workers to understand and apply best practices.
 - 4.2. Personal Protective Equipment: Where applicable, suppliers must provide their workforce with necessary Personal Protective Equipment (PPE) and ensure they understand how and when it needs to be applied.
 - 4.3. Emergency Preparedness: Suppliers should use best efforts to reduce the risk of occupational hazards and develop an emergency preparedness and response plan.
 - 4.4. Incident and Accident Management: Suppliers should implement hazard and risk analysis systems to minimize the potential for incidents or accidents at the workplace. An investigation system should drive to determine the root cause, and a corrective action system should ensure all permanent measures have been taken to minimize the chance of a recurrence.
5. Develop, implement, and support a proactive approach to environmental responsibility through environmental protection practices, conserving natural resources and reducing overall environmental footprint of production, goods and services throughout their life cycle. Suppliers should implement an environmental management system that includes the following:
 - 5.1. Carbon Emission Reduction: Suppliers should strive to set science-based and time-bound emission reduction goals and renewable energy objectives and put in place measures that drive forward the decarbonization of the supply chain.



- 5.2. Water Quality, Consumption & Management: Suppliers should seek to minimize water consumption, effectively reuse and recycle water with responsible treatment of wastewater discharges and prevent potential impacts of rainwater run-off, as required by and in accordance with applicable law.
 - 5.3. Air Quality: Suppliers should routinely monitor and disclose, appropriately control, minimize, and to the extent possible, seek to eliminate emissions contributing to air pollution, as required by and in accordance with applicable law. Suppliers should assess cumulative impacts of pollution sources at their facilities and mitigate their pollution levels accordingly.
 - 5.4. Responsible Chemical Management: Suppliers should identify, minimize or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. Suppliers should also be aware of any use of restricted substances in processes and finished products, and actively investigate suitable substitutes to maintain product and environmental stewardship.
 - 5.5. Biodiversity, Land Use and Deforestation: Suppliers should protect ecosystems, especially key biodiversity areas, impacted by their operations, and avoid illegal deforestation in accordance with international biodiversity regulations, including the IUCN Resolutions and Recommendations on Biodiversity.
 - 5.6. Soil Quality: Where appropriate, suppliers should monitor and control their impact on soil quality to prevent soil erosion, nutrient degradation, subsidence and contamination.
 - 5.7. Noise Emissions: Where appropriate, suppliers should monitor and control the levels of industrial noise to avoid noise pollution.
 - 5.8. Animal Welfare: Where relevant, suppliers should respect the five animal freedoms formalized by the World Organization for Animal Health (OIE) concerning animal welfare.
6. Uphold the highest standards of integrity and operate honestly and equitably throughout the supply chain. Suppliers should implement a management system for business ethics that includes the following:
- 6.1. Anti-Corruption and Anti-Money Laundering: Suppliers should not participate in or endorse any corrupt practices in whatever form, including offering or accepting bribes, excessive gifts or hospitality or facilitation payments. Suppliers should not facilitate or support money laundering. Suppliers should report any suspicious transactions and be alert for signs of money laundering. This obligation includes facilitation payments.
 - 6.2. Data Protection and Data Security: Suppliers should have the necessary infrastructure to ensure the respect of the privacy and civil liberties in respect of the collection, retention, use or dissemination, as well as any other processing of personal data.
 - 6.3. Financial Responsibility/Accurate Records: Suppliers should perform their business dealings in a transparent manner and accurately reflect them in financial reports and filings. Suppliers should confirm an adequate financial reporting system control is in place.
 - 6.4. Disclosure of Information: Suppliers should disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices.
 - 6.5. Conflicts of Interest: Suppliers should ensure that their employees avoid and disclose situations where their financial or other interests conflict with job responsibilities, or situations giving any appearance of impropriety.
 - 6.6. Counterfeit Parts: Suppliers should minimize the risk of introducing counterfeit and/or diverted parts and materials into deliverable products and adhere to relevant technical regulations in the product design process.
 - 6.7. Intellectual Property: Suppliers should respect valid intellectual property rights.



- 6.8. Export Controls, Trade, and Economic Sanctions: Suppliers should comply with applicable restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.
 - 6.9. Grievance Mechanism: Suppliers should establish an effective grievance mechanism in line with UN Guiding Principle 31 that allows concerns related to business ethics, human rights, or any other topic to be raised anonymously, confidentially and without retaliation.
 - 6.10. Remediation: Suppliers should provide for or cooperate in remediation through legitimate processes when their business activities cause or contribute to adverse environmental or social impacts.
 - 6.11. Non-retaliation: Suppliers should avoid any form of threats, intimidation, and physical or legal attacks against stakeholders, including those exercising their legal rights to freedom of expression, association, peaceful assembly and protest their business activities.
7. Disclose and share details of own operations through third party programs upon request. Suppliers are expected to:
 - 7.1. Meet Novelis requests including, but not limited to completing internal questionnaires, allowing onsite visits, providing documentation and records, and sharing audit reports.
 - 7.2. Address Novelis (or Novelis' customer) requests for third-party assessments and audits:
 - 7.2.1. Third-party assessments: Novelis may request Suppliers to complete third-party assessments through EcoVadis, Sedex SAQ, or a similar platform or tool.
 - 7.2.2. Third-party audits: Novelis may also request audits at Supplier sites. Audit schemes will vary based on scope, region, raw material, and partners. These include, but are not limited to:
 - RBA audits
 - SA8000 audits
 - Sedex SMETA 4-pillar audits
 - Reports from audit programs that are not listed above are subject to Novelis review and approval.
 - 7.2.3. Develop and implement corrective action plans for gaps identified through assessments and audits.
 - 7.3. Disclose and share details of own operations upon request. We encourage our Suppliers to be transparent about supply chain challenges so we can work towards identifying and implementing practical solutions together.
 8. Cascade these requirements to their suppliers through to the raw materials that make up the goods supplied to Novelis.

Supply Chain Disclosures

Novelis participates in various supply chain disclosures. We also encourage our Suppliers to disclose information about their own sourcing practices and operations to support the sustainability of their business. Novelis may request suppliers to do so through U.S. Customs and Border Protection (CBP) or similar programs.



Reporting Violations

We encourage any party to report concerns relating to potential violations of this policy through our third-party operated Ethics Hotline, which is available on our website, email and phone. Novelis will investigate, address and respond to suspected policy violations reported to the Ethics Hotline. Novelis does not tolerate retaliation against anyone who reports suspected violations of law or policy in good faith.

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.

RELATED POLICIES

Novelis Code of Conduct
Novelis Human Rights and Forced Labor Policy
Novelis Supplier Code of Conduct
Novelis Responsible Minerals Sourcing Statement

POLICY CONTACT

Global Responsible Sourcing Manager

Policy Owner: Global Procurement Excellence

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