

Novelis

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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 re-creating 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 (this "Code") outlines Novelis' expectations for how its suppliers will conduct their businesses in an ethical and responsible manner. Every Novelis supplier is expected to agree to the terms of this Code and uphold this Code in all of 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 your company's reputation and brand value;
- realize efficiencies 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.

Thank you,



Nick Madden
Senior Vice President and Chief Supply Chain Officer

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Sustainability Approach

With operations and customers all over the world, Novelis has a truly global presence that requires a global approach. With a diverse portfolio of industries in which our products are used, from transportation to packaging to architecture to electronics, our sense of duty to make responsible decisions is a key priority. 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.

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.

LABOUR

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 labour;
Principle 5 the effective abolition of child labour; 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.

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



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Legal Compliance

Novelis is committed to ensuring that our global operations are in compliance with government regulations and legal requirements in each country in which we operate and that we serve. Just as we hold ourselves to these standards, we expect our suppliers to adopt and embrace them as well. Therefore, all suppliers are expected to adhere to these standards, and any behavior that deviates from them will not be tolerated.

Novelis suppliers are expected to:

- Comply with the laws and regulations of the countries in which they operate; and
- 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 & Human Rights

Novelis seeks to ensure that its operations respect and support fundamental human rights, and we expect our suppliers to do the same.

Novelis suppliers are expected to:

- Promote equal opportunities for and treatment of its employees, irrespective of skin color, race, nationality, social background, disabilities, sexual orientation, political or religious conviction, sex, age, pregnancy, ancestry, medical condition, marital status, gender identity or genetic information;
- Respect the personal dignity, privacy and rights of each individual;
- 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 the applicable national statutory minimum wage;
- Comply with the maximum number of working hours set forth by applicable laws; and
- 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.

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Abolition of Child Labor

Novelis does 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 refrains from employing workers under the age of 16. Novelis expects its suppliers to adhere to these limitations in support of the prohibition against child labor.

Novelis suppliers are expected to:

- Employ no workers under the age of 16, except interns or apprentices managed under close supervision who will not undertake any type of work which is likely to jeopardize their health, safety or morals.

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 expected 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; and
- Manage and address occupational health and safety issues with appropriate systems and processes.



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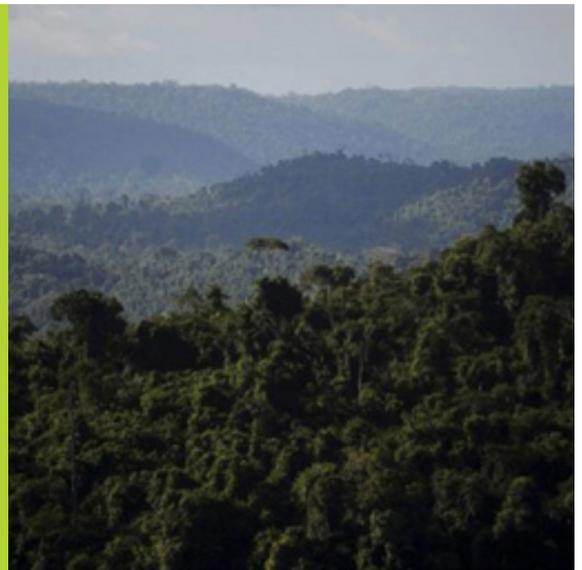
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Environmental Protection

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 of improving our products' overall life cycle to reduce greenhouse gas emissions and usage of energy, water and other resources, and increase recyclability in order to reduce landfill waste. We expect our suppliers to have necessary systems to minimize the impact of their operations and products on the environment and maintain compliance with government regulations.

Novelis suppliers are expected 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; and
- Provide environmental and other sustainability data to Novelis when requested.



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 expected to:

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

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Application & 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- questionnaire/survey;
- Supplier audits; and
- Inspections.

Note: Any potential audit and/or inspections should only occur if previously communicated and agreed upon with supplier.

In case any violation of this Code is identified, the applicable supplier might, at Novelis discretion, be given time to remediate the problem, with Novelis' assistance where possible. If the problem is not addressed in an effective way and within a clear timeframe that is acceptable to Novelis, Novelis reserves the right to terminate our business relationship with the violating supplier.

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

Supplier Acknowledgement & 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: _____