NOVELIS – SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDING March 2023

Introduction

This statement is made pursuant to Part 6 and section 54(1) of the Modern Slavery Act 2015 and sets out the steps that NOVELIS UK Ltd ("the Company") has taken or will take to ensure that the Company and companies in the supply chains are free from slavery and human trafficking during the financial year ending March 2023.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. NOVELIS has a zero tolerance approach to any form of modern slavery or human trafficking. The Company is committed to acting ethically and to prevent slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that its supply chains are also free from such practices. The Company is committed to acting with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the Company or its supply chain.

Our business organisational structure and operations

NOVELIS is the world leader in rolled aluminium products, delivering unique solutions for the most demanding global applications, such as beverage cans, automobiles, architecture and consumer electronics.

The Company is headquartered in Atlanta, Georgia. The Company's European operations are headquartered in Zurich, Switzerland.

NOVELIS employs around 12,000 employees worldwide, of which around 5,000 are based in Europe. The Company operates in 11 countries across 4 continents worldwide

NOVELIS is incorporated in the UK through Novelis UK Limited, Novelis Europe Holdings Limited and Novelis Services Limited.

NOVELIS globally has an annual turnover of over $18.5 billion.

Policies relating to slavery and human trafficking

The Company's Code of Conduct reflects its commitment to acting ethically and with integrity in all its business activities and relationships.

Suppliers

NOVELIS is committed to ensuring that its global operations are in compliance with government regulations and legal requirements in each country in which it operates and that it serves. Suppliers must comply with the NOVELIS Supplier Code of Conduct to ensure Suppliers meet the same standards

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Registered in England No. 00279596 Registered Office: Latchford Locks Works,
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of compliance as NOVELIS employees. Under the NOVELIS Supplier Code of Conduct, Suppliers must:

- 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;
- provide fair remuneration and guarantee the applicable national statutory minimum wage; and
- employ no workers under the age of 16.

The Company conducts due diligence on all suppliers before granting them the status of becoming a preferred supplier.

Code of Conduct and awareness raising programme

All NOVELIS employees must comply with the Company Code of Conduct which sets out the standard of ethics that the Company expects from all of its employees. An ethics hotline is in place in each of the countries in which the Company operates for employees to report concerns or suspected violations.

The Code of Conduct stipulates that NOVELIS is guided by principles of non-discrimination and respect for human rights and individual liberties of all citizens. All employees are expected to conduct themselves in a manner that assures customers, suppliers and fellow employees are treated with respect, fairness and dignity.

The Company will require that all employees holding procurement or senior management roles receive training on the requirements of the Modern Slavery Act 2015.

The Company will also conduct an awareness raising programme among its employees to ensure that they are aware of the Company's zero tolerance approach to slavery and human trafficking. All NOVELIS employees have been made aware of NOVELIS' commitment to the prevention of exploitation and abuse associated with modern slavery and human trafficking.

High risk areas

In addition to this statement, a risk assessment will be prepared which sets out the key slavery and human trafficking risks to the business and specify any control measures required to mitigate the risk.

Performance Indicators

The Company will assess the effectiveness of the steps taken to ensure that slavery and human trafficking are not taking place within the business or the supply chain.

The Company will monitor whether investigations are commenced and undertaken by law enforcement agencies and regulators that indicate that modern slavery or human trafficking practices have been identified.

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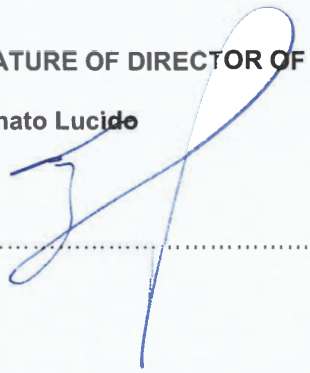
The Company will also monitor whistleblowing reports from employees and reports from members of the public to ensure that modern slavery and human trafficking is not occurring within its business or supply chain.

This Slavery and Trafficking Statement has been approved by the Board of the Company.

SIGNATURE OF DIRECTOR OF NOVELIS

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