



## **NOVELIS – SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDING March 2024**

### **I. Introduction**

This statement is made pursuant to Part 6 (Transparency in Supply Chains etc.) and section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Novelis UK Ltd., a subsidiary of Novelis Inc. (Novelis UK Ltd hereinafter referred to as the “**Company**” or – individually and/or together with Novelis Inc. as “**Novelis**”) has taken or will take to ensure that the Company and companies in its supply chain are free from slavery and human trafficking during Novelis’ financial year from April 1, 2023 through March 2024.

Modern slavery encompasses slavery, servitude and forced or compulsory labour, and human trafficking.

Novelis has a zero-tolerance approach to any form of modern slavery. The Company is committed to acting ethically and to prevent modern slavery occurring in any of its corporate activities, as well as seeking to ensure that its supply chains are also free from such practices. Novelis 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.

### **II. Our business organisational structure and operations**

Novelis is the world leading producer of flat-rolled aluminium products and the world’s largest recycler of aluminium. Novelis is delivering unique solutions for the most demanding global applications, such as beverage packaging, automobiles, aerospace, architecture and consumer electronics.

Novelis’ global headquarter is in Atlanta, Georgia. The Company’s European operations are headquartered in Küsnacht, Switzerland.

Novelis employs around 13,000 employees worldwide, of which around 6,000 are based in Europe. Novelis operates in 9 countries across 4 continents worldwide. In the UK Novelis is incorporated through Novelis UK Limited, Novelis Europe Holdings Limited and Novelis Services Limited. Novelis’ global annual turnover is over \$16.2 billion.

### **III. Novelis’ policies relating to slavery and human trafficking**

#### **1. Novelis Code of Conduct**

Novelis’ Code of Conduct reflects its commitment to uphold our ethical standards and to personify Novelis as a reputable manufacturer, a respected business partner, a good corporate citizen and a respectful employer acting ethically and with integrity in all its business activities and relationships.

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Cheshire, UK, WA4 1NN  
+44 1925 784100 | [novelis.com](http://novelis.com)

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## 2. Human Rights and Forced Labour Policy

Novelis affirms that all humans are created equal in dignity and in rights. Considering this fundamental belief, Novelis has set forth principles that guide its business, the treatment of its employees, and its interactions with the communities in which we operate. Therefore, in furtherance of the Universal Declaration of Human Rights, and consistent with its Code of Conduct, as well as Novelis' commitment to continue to uphold the principles of the United Nations Global Compact, Novelis has adopted the Human Rights and Forced Labour Policy.

The Human Rights and Forces Labour Policy expects all employees, officers, directors, and agents to recognize the uniqueness of all people Novelis employs and Novelis collaborates with, without regard to race, colour, gender, sexual orientation, language, religion, age, marital status, political or other opinion, national or social origin, property, birth or other status.

Based on the Human Rights and Force Labour Policy people shall be compensated in accordance with their level of skill and experience, having the right to equal pay for equal work, and fair remuneration. Novelis guarantees the applicable minimum wage and complies with the maximum number of working hours as set forth by applicable laws. Furthermore, all employees have the right to rest and leisure, which includes the reasonable limitation of working hours, overtime compensation, and regular paid time off for holidays and have access to a work environment that is safe and healthy and complies with all requirements in the jurisdictions where Novelis operates.

Furthermore, the policy sets out that Novelis does not tolerate, engage in or support forced labour, human trafficking, or slavery in its operations or anywhere in its supply chain. Novelis and its employees are prohibited from participating in, or benefiting from, customers' or suppliers' forced labour, human trafficking, or slavery activities. Novelis does also not tolerate nor do we employ workers below the applicable lawful minimum working age in the jurisdictions we operate. Thus, as a fundamental principle, Novelis does not employ children or support the use of child labour.

## 3. Novelis Supplier Code of Conduct

Novelis' Supplier Code of Conduct outlines which standards Novelis expects its Suppliers to meet not only with regards to sustainability but also with regards to labour, human rights and children's rights.

With regards to child labour, Novelis expects its suppliers to 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 expects its Suppliers to not employ workers under the age of 16.

Regarding labour and human rights Novelis furthermore expects its suppliers to comply with human rights due diligence obligations and to appropriately address them within their own supply chain. The subject of the human rights due diligence obligations are prohibition of forced labour and all forms of slavery, disregard for occupational health and safety and work-related health hazards, contempt for freedom of association and right to collective bargaining, prohibition of unequal treatment in employment, of withholding fair wages, of unlawful forced eviction and the prohibition of unlawful seizure of land, forests, and waters in the event of their acquisition, development, or other use, on hiring or using private/public security forces that may cause interference due to lack of instruction may lead to adverse effects due to lack of instruction or control and the prohibition of any action or breach of duty going beyond the foregoing.

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## IV. Supply Chain Transparency and 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. Every Novelis Supplier is therefore expected to comply with the terms of Novelis' Supplier Code of Conduct and drive compliance and especially must comply with the laws and regulations of the countries in which they operate; ensure that they do not commit and are not involved in any human rights violations; promote equal opportunities for and treatment of its employees; respect the personal dignity, privacy, and rights of everyone; not force any person to work against his or her will; refuse to tolerate an unacceptable treatment of employees, such as mental cruelty, sexual or personal harassment or unlawful discrimination; provide fair remuneration and guarantee at least the applicable national statutory minimum wage; comply with the maximum number of working hours set forth by applicable laws; recognize, to the extent legally permitted, the right of free association of employees, and not discriminate in favour of or against members of employee organizations or trade unions; advance the health and safety of its employees; control hazards and take precautionary measures against accidents and occupational diseases; establish an appropriate complaint mechanism to enable persons to raise concerns about the above-mentioned human rights and environmental risks, as well as violations of human rights and environmental obligations that have arisen because of the Supplier's economic activities or in their supply chain; and inform Novelis immediately about breaches in their supply chain related to the risks outlined in Novelis Supplier Code of Conduct, as far as such breaches have an impact on Novelis, and work on remedy all such violations, if necessary, with support of Novelis;

The Company conducts due diligence on each supplier before granting it the status of becoming a preferred supplier.

## V. Awareness Raising Programme

All Novelis employees must comply with the Novelis' Code of Conduct which sets out the standard of ethics that the Company expects from all its employees.

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 also conducts 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.

## VI. Suspicious Behaviour and Reporting

As part of Novelis initiative to identify and mitigate risky. The Company's employees who witness suspicious behaviour with the Company's business or in its supply chain, are trained to reach out to their manager, human resources representative, or Novelis' Chief Compliance Officer. Employees are furthermore encouraged to raise any issue or concern about suspected violation of Novelis' Code of Conduct or Supplier Code of Conduct through the use of Novelis' ethics hotline. This is a confidential hotline which allows employees to report their concerns anonymously, either by phone or online. The hotline is available 24 hours a day, seven days a

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week and neither Novelis nor the Company do tolerate any retaliation against anyone whom make a report in good faith. An ethics hotline is in place in each of the countries in which the Company operates for employees to report concerns or suspected violations.

## VII. Risk Areas

In addition to this statement, a risk assessment will be prepared to determine in which business areas and out of which countries slavery and human trafficking risks exist for the business and will specify control measures required to mitigate the risk.

## VIII. 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.

The Company also monitors 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.

## IX. Final Statement

This Statement was approved by the Board of Directors of the Company for purposes of Section 54 of the United Kingdom Modern Slavery Act and is signed by one of its directors.

**Novelis UK Ltd.**



name: Fortunato Lucido  
function: Director

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