



Conflict Minerals Sourcing Policy

Dec 2021

Novelis (China)

Introduction

- The United Nations Group of Experts on the Democratic Republic of Congo (DRC) found that the trade of certain minerals, Columbite-Tantalite (Coltan/Tantalum), Cassiterite (Tin), Wolframite (Tungsten) and Goad, called Conflict Minerals (3TG), is helping to finance the civil conflict in the DRC characterized by extreme levels of violence, particularly sexual-and gender-based violence.
- In July 2010, the United States adopted the section 1502 of Dodd-Frank Wall Street Reform and Consumer Protection Act (ACT) requiring all US public companies and their suppliers to disclose the chain of custody usage of Conflict Minerals
- Novelis is committed to sourcing components and materials from companies that share our values regarding human rights and social responsibility.

Purpose

- Novelis China intends to comply with the requirements which aim to prevent the use of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo (DRC) or an adjoining country as defined in the "ACT" .
- Novelis China suppliers are required to comply with Novelis Supplier Code of Conduct, which includes requirements relating to Conflict Minerals and responsible sourcing. Relevant suppliers are responsible for passing these same requirements on to their suppliers.

Scope

- All suppliers under categories of Cast house, Alloys, Chemicals, Coating Can, Coating Auto, Rolling Oil.

Statement

It is the policy of Novelis (China) to avoid our products and the derivatives which including tungsten, tin and tungsten that directly or indirectly finance or benefit armed groups from conflict-affected regions. As part of Novelis (China)' s commitment to corporate responsibility and respecting human rights in our own operations and in our global supply chain, it is Novelis (China) 's goal to seek to only procure raw materials and the derivatives that does not support conflict. In support of this sourcing policy, we will:

- i. Exercise annual due diligence (see appendix) with relevant supplier (Cast house suppliers, Alloys suppliers, Chemicals suppliers, Coating Can suppliers, Coating Auto suppliers, Rolling Oil suppliers) consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our suppliers to do likewise with their suppliers
- ii. Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm mineral and the derivatives in our supply-chain does not support conflict.

- iii. Immediately discontinue engagement with suppliers who pose a reasonable risk to be supporting conflict.
- iv. Commit to transparency in the implementation of this policy by making available reports on our progress to our customers and the public (as required).

Appendix I: Communication mail to potential suppliers



Appendix
I-Conflict Mineral

Appendix II: Conflict Minerals Questionnaire



Appendix
II-Conflict Minera

Novelis China
Policy established: [DEC. 20TH, 2021]