



Harassment

OVERVIEW

It is the intent of Novelis to provide a work environment free of harassment. All Novelis employees are expected to maintain a working environment of mutual respect and dignity. Novelis will not tolerate any form of harassment including harassment based on gender, race, national origin, age, religion, color, sexual orientation, gender identity, national origin, marital status, real or perceived disability or handicap, veteran status, citizenship, pregnancy, genetic information or any legally protected category.

Novelis' Standard Against Harassment applies to all persons involved in Company operations and prohibits harassment by any employee of Novelis. This standard also prohibits harassment by vendors or clients, and prohibits Novelis employees from harassing vendors or clients. If harassment occurs on the job, whether on or off the premises or by someone not employed by Novelis, the procedures in this standard should be followed as if the harasser were an employee of Novelis.

AUDIENCE

This standard applies to the extent permitted by applicable law to all employees of Novelis Inc. and each business unit, department function or group thereof and, to the extent permitted by applicable law, each of its subsidiaries and affiliates ("Novelis" or "Company"), unless otherwise covered by a collective bargaining agreement or otherwise subject to possible participation rights of Works Council or other national employee representatives.

This standard also applies to all employee interactions with other employees, contractors, vendors, customers, visitors, and the public, candidates seeking employment with Company, and all other individuals, if those interactions have a connection to the employee's work for the Company.

This standard is not intended to be and does not create a contract (express or implied) on the part of Novelis or its employees.

STANDARD

Harassment includes conduct that unreasonably interferes with an individual's work or ability to perform duties by creating an intimidating, hostile or offensive working environment. It can include, but is not limited to:

- verbal abuse or insults;
- bullying;
- gestures or physical contact;
- display or circulation of degrading or derogatory pictures or materials; or

- sending emails or other electronic communication that contain discriminatory and/or harassing content.

Sexual Harassment

Novelis takes every reasonable step to prevent discrimination and harassment from occurring within the Company. Sexual harassment includes unwelcome sexual advances, requests for sexual favors and other physical or verbal conduct of a sexual nature when:

- submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or a basis for employment decisions affecting the individual; or
- such advances, requests or conduct have the purpose or effect of interfering with an individual's work performance by creating an intimidating, hostile, humiliating or offensive work environment.

Sexual harassment is not limited to inappropriate behavior from a male employee towards a female employee or a supervisor toward a subordinate. Victims of sexual harassment can be a man, woman, supervisor, or employee. The harassment may come from a manager or supervisor who does not directly supervise the victim. It can also come from a co-worker, a client, or a vendor. A harasser may also be the same sex as the victim.

Employees are expected to act professionally at all times and must avoid conduct of any kind that disrupts or interferes with another person's work performance and/or work environment. Harassment is a form of misconduct that undermines the integrity of the employment relationship. Each manager and supervisor is responsible for maintaining a work environment free of harassment and ensuring mutual dignity and respect among employees.

Any employee who believes that he/she has been discriminated against or harassed in violation of this standard should follow the complaint procedure for investigating and resolving such complaints set forth in your handbook and/or by reporting the matter to member of management, a Human Resources representative or by contacting the Novelis Ethics Hotline.

Harassment Complaint Procedure

Any employee who believes he/she has experienced harassment, or has witnessed harassment by any employee, vendor, client or other person in connection with his/her employment, must report the incident immediately to his/her supervisor or manager. If the employee feels uncomfortable reporting the harassment to his/her supervisor or manager, the employee must immediately report the matter to another member of management, a Human Resources representative, or contact the Novelis Ethics Hotline. Novelis will respond to and investigate such information and take appropriate corrective action.

Investigation of Harassment Complaint

All reported incidents of harassment will be investigated for the purpose of determining the facts, whether it constituted harassment, and what remedial actions, if any, are appropriate. The investigation of a reported incident will be conducted as follows:

- All investigations will be conducted in as confidential a manner as possible;
- The complaint will be written up and signed by the complainant;
- Both the complainant and the alleged harasser will be interviewed as part of the investigation and both will be informed of the non-retaliation provisions of this standard;
- The complainant will be asked for corroborating evidence, and corroborating witnesses may be interviewed;
- The investigator's notes will be kept confidential and not included in any personnel file;
- Generally, the investigator will report to the Regional HR Leader and any other appropriate stakeholder and the Company will, as and if appropriate, take action, including to stop any offending conduct, to preclude future offending conduct, and to restore workplace relations; and
- The complainant will be informed when the investigation is complete.

Any individual who the Company determines has made a claim of harassment in "bad faith" may be disciplined up to and including termination.

Retaliation is Prohibited

Retaliation against employees, vendors or clients who in good faith report harassment, object to harassment, or assist in a harassment investigation, is prohibited.

Any employee who believes he/she has been retaliated against for filing a complaint or participating in an investigation should report it to a supervisor, a Human Resources representative, or contact the Novelis Ethics Hotline.

ROLES AND RESPONSIBILITIES

It is the responsibility of the Human Resources Department to implement and follow this standard. All managers and supervisory staff share responsibility for the implementation of this standard. It is the responsibility of all employees to comply with this standard and report any violations.

COMPLIANCE AND ENFORCEMENT

The requirements outlined in this standard must be followed by the Human Resources Department, as well as all managers and supervisory staff. All employees of Novelis, as a condition of employment and in accordance with the Company's Code of Conduct must comply with this standard.

RELATED STANDARDS

Code of Conduct
Fraternization Standard

SUPERSEDING STANDARDS

This standard supersedes all other previously issued Company standards against harassment.

CONTACT LIST

Employees may contact the Novelis Ethics Hotline or their local HR representative if they have any questions about this standard. Although the Company generally will provide prior notification when possible, the Company reserves the right to change, amend, or terminate the referenced plans, programs, standards and/or procedures at any time, without notice, subject to applicable law and/or the terms of any applicable collective bargaining agreement or contracts in place. The information provided is not intended to supersede any applicable local, state or country law or the terms or provisions of any current collective bargaining agreement. In the event of a conflict with this standard, the applicable law, contract, or collective bargaining agreement shall prevail.

Novelis Ethics Hotline Numbers	
Country	Number
Brazil	0800-892-1819
Canada	1-800-844-3389
France	0800-91-5646
Germany	0800-180-6638
Italy	800-788381
South Korea	00308-132684
Luxembourg	800-2-5587
Malaysia	1-800-81-6212
Switzerland	0800-56-3308
United Kingdom	0808-234-0284
United States	1-800-844-3389