

What can be reported on the **Novelis Ethical Line**

This Line exists to give you the safety, security, and reliability you need to make your report with peace of mind. Check below to learn about the irregular situations, behaviors and conduct that can (and should) be reported.

1. Misconduct

Misconduct are attitudes and behavior that violate the guidelines established in our **Code of Ethics and Conduct** and **Internal Policies**, as well as in **current legislation**.

The list below brings some practical examples of this type of irregularities. If you identify actions like these, report it!

- ✓ Conflict of Interest.
- ✓ Favoring suppliers, customers and/or other people/external organizations.
- ✓ Damage to the company's image and/or reputation.
- ✓ Failure to comply with internal rules and procedures.
- ✓ Improper relationship with public agents.
- ✓ Retaliation.
- ✓ Malicious allegations.
- ✓ Among others.



2. Behavioral issues

Creating and maintaining a healthy and welcoming work environment is **up to all of us**. For this reason, behavior that is harmful to work relationships **cannot be tolerated**.

See below some **situations that are not consistent with our company's values** and that must be reported in the Ethical Line, if they occur:

- ✓ Sexual or moral harassment.
- ✓ Nepotism, affective relationship with direct subordinate.
- ✓ Racism, prejudice, discrimination, disrespect for diversity, etc.
- ✓ Workplace safety (non-compliance with procedures, accidents, etc.)
- ✓ Slave labor, child labor.
- ✓ Non-compliance with basic management requirements (employee recruiting, poor management, leadership issues, etc.).
- ✓ Among others.

3. Misuse of company materials

Taking care of and making conscious use of the equipment and materials made available by us is also a collective duty. Using company assets for **personal purposes and/or inappropriately** cannot be normalized.

Check out some examples of attitudes related to this topic that, when observed, should be reported:

- ✓ Theft/diversion of goods and assets (money, raw materials, finished goods, software, fixed assets, etc.).
- ✓ Destruction or damage of company property.
- ✓ Theft of intellectual property, leakage of confidential information and/or trade secrets.
- ✓ Misuse of company resources (including electronic media).
- ✓ Among others.



4. Cases that violate the Anti-Corruption Law

You can also report attitudes provided for in the **Brazilian Anti-Corruption Law (12.846/13)**.

The **Anti-Corruption Law** was created to ensure the upholding of integrity practices in business relations between private companies and the public administration.

This legislation foresees the application of fines and penalties for actions such as:

- ✓ Corruption, bribery, kickbacks.
- ✓ Competition issues (cartels, tie-in sales, price fixing, consumer harm, etc.).
- ✓ Bidding fraud.
- ✓ Accounting fraud or irregularities in financial statements.
- ✓ Facilitation payments.
- ✓ Money laundering.
- ✓ Other illegal actions against public administration.

5. Non-compliance with other laws

All other irregularities not related to the Anti-Corruption Law can also be reported through the Novelis Ethical Line, as well as **actions contrary to other laws**, namely:

- ✓ Environmental Laws.
- ✓ Tax Laws.
- ✓ Corporate Laws.
- ✓ Regulations specific to our business segment (e.g. regulatory bodies).
- ✓ Financial Market Regulations (Central Bank, CVM [Brazilian Securities and Exchange Commission], etc.)
- ✓ Wage discrimination 14.611.
- ✓ Among others.

If you identify any illegal or inappropriate behavior, such as mentioned in the examples, you can report it and help us build a healthier work environment.

Your contribution is really important to us!