



Alcohol & Contraband Policy

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*Placed before the Board of Directors at its meeting held on February 13, 2024, and reviewed/approved thereat.

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Note: *This Policy may be updated by Hindalco in its sole discretion, as and when required and shall be available on Hindalco's online intranet portal/ website and may be made available through e-mail communication.*



Alcohol & Contraband Policy

Hindalco Industries Limited (“**Hindalco/Company**”) espouses the health, safety and well-being of its employees, partners, and associates and has undertaken to uphold the same. The commitment to maintaining a safe and secure conditions of work require a clear Policy relating to the Prohibition of **Contrabands** (includes illicit drugs – narcotics & psychotropic substances, and illegal or unauthorized use or consumption of the above) **and Alcohol at Work Areas (“Policy”)**.

This Policy applies to the employees of the Company, its contractors, sub-contractors, vendors, business associates, representatives, and visitors while on Company’s premises, or at any other location of the Customers for whom we perform work, including but not limited to while operating Company owned/ hired vehicles or equipment or such other location where Company related work is being carried out or a gathering organized by the Company.

Employees must abide by all the terms of the Alcohol & Contraband-Free Work Areas Policy. The terms included in the policy are:

- No person shall work / be present under the influence of illegal narcotics (including drugs and alcohol) while at workplaces and may have to undergo alcohol or drug testing, if required.
- All employees/business partners may have to undergo physical inspection of persons, property for Contraband at any time during employment.
- It is mandatory for all individuals to report to management if any violation is observed against this Policy.
- Any violation of this policy shall result in appropriate disciplinary/legal actions.

We are committed to demonstrating Zero Harm & Zero Tolerance on illicit use /possession of Alcohol & Contraband at the Work Areas while facilitating requisite resources to ensure this. **It shall be a paramount responsibility of every employee and stakeholder to ensure their health and safety at Work and to uphold the Policy in letter and spirit.**

Hindalco adopts this position to ensure compliance with Corporate Health, Safety Environment Policy, and Code of Conduct including applicable Laws.

This Policy shall be in force with immediate effect. HR SPOCS shall ensure dissemination of the contents of this Policy across all offices, units, and business locations.

Satish Pai
Managing Director



Alcohol & Contraband Policy

I. Purpose Statement & Goal

Hindalco is strongly committed to the health, safety and well-being of its employees, their families, its customers, and other stakeholders. It is acknowledged that Alcohol and Contraband Usage can have detrimental effect(s) on work performance and behavior, and that, performing work under the influence or while in possession of alcohol or Contraband can imperil health, safety and well-being of the person and put those around at risk.

To this end, the production, manufacture, possession, use, purchase, sale, supply, consumption, distribution, storage, transport, import, export, and related activities of:

- (i) any drug, drug paraphernalia, narcotics, psychotropic substances, as may be prohibited or declared illegal under the applicable laws of India, or any other similar item or substance which could cause or contribute to injury to Company personnel or damage to its property ("**Contraband**") along with
- (ii) consumption, possession, storage, supply, or distribution of Alcohol

is strictly prohibited at work locations, including but not limited to Offices, Factory locations, Townships, or while travelling for or in course of work of Hindalco or other business premises ("hereinafter referred to as "**Work Areas**") of Hindalco.

Company will practice zero-tolerance towards consumption of Alcohol or Use of Contraband at Work Areas or while in course of work with the Company, in violation of this Policy. It is expressly clarified that the violator of this Policy may be immediately confined / detained or expelled from the premises, whether private or at social event and be subject to appropriate actions, penal or legal, including disciplinary actions, in case of contravention.

The company believes this is in the best interest and well-being of its employees, stakeholders, and ethos.

II. Scope and Extent of Policy

This Policy applies to all employees, contractors, sub-contractors, vendors, business associates, representatives, and visitors while in Company's Work Areas, or at any other location of the Customers for whom Company performs work or any action or activity that is incidental or related

to the Business and/or reputation of Company, its Affiliates or Aditya Birla Group. It also applies to employees of firms / organizations doing business with Hindalco while on Company premises.

III. Company's Obligations

To provide an environment free of illicit Alcohol & Contraband, the Company undertakes:

- i. To provide awareness through training, education, and communication about ill-effects of Alcohol and other Contraband abuse. Employees will be required to acknowledge completion of such Training.
- ii. To make the Policy available to all employees in general, including at induction and the Policy will be made available on the intranet and / or employee handbook.
- iii. To facilitate and support with necessary resources, employees who have been identified with Alcohol or Contraband Abuse problems.
- iv. To treat all persons concerned with incidents related to illicit Alcohol or Contraband Consumption with confidentiality and ensure privacy be kept intact.
- v. To co-operate with external law enforcement Agencies, as and when required.
- vi. To institute inquiries / appropriate, in line with Company Policy and/or SoPs as maybe notified, legal actions in case of contravention with the provision of this Policy and /or any other legal provisions, as applicable, including through screening, inspection, drug testing and other measures, as deemed appropriate. employees who engage in Use (i.e., sale, possession, transaction, or transfer of illegal/unauthorized) of Contraband or illicit consumption of Alcohol during working hours or at Work Areas; or abuse of prescribed drugs will be subject to disciplinary action up to and including termination and necessary legal actions.
- vii. To carry out any screening or tests conducted on goods or persons (respectively) under the policy as per applicable Confidentiality and Privacy obligations. The Company will endeavor to ensure discretion and confidence in dealing with any alleged abuse case.
- viii. To be reviewed periodically the content and implementation of this policy will be by the Management and may be subject to amendment from time to time.

IV. Search & Screening Requirements

The Company may authorize its personnel to take any or all the following actions towards compliance of the Policy:

- i. To conduct alcohol and / or drug screen tests both prospective to and during employment.
- ii. To inspect and / or search, with or without prior notice, anyone suspected of possessing Alcohol and / or Contraband basis reliable information / reasonable suspicion. Reasonable suspicion includes, physical evidence of use, involvement in incidents involving Contraband or illicit Alcohol.
- iii. To ensure that the employee meets the drug and alcohol testing requirements, if any, of the Customer entities for which the Company carries out work.
- iv. To take such other measures, against an employee, in case found to be under the influence of alcohol or use of Contraband, to safeguard safety, well-being and decorum of the persons and the premises.

V. Personal Consumption of Alcohol and at Social Events by Company

- i. Alcohol, i.e., its storage, possession, and consumption, as per the applicable legal norms, within or inside residential premises/rooms/quarters of the Township of the Company is outside the scope of this Policy. The company will neither partake any responsibility for personal actions nor will condone any consequences arising out of such act(s), in contravention of Code of Conduct, applicable Policies or legal provisions. Employee(s) must ensure compliance and related requirements are also adhered to by their concerned persons/families/relatives or friends visiting or living in the Company premises in this regard.
- ii. Further, Social Events means and includes Company sponsored events, functions, parties, activities get-together, gatherings, festivities that can be held at the Work Areas or any other location, authorized by the management concerned. Storage, possession and consumption of Alcohol will be strictly in terms of applicable legal norms.
- iii. Consumption of alcohol at Social Events, including its limit, is to be allowed only with prior written permission of the Management. The discretion of the Management will be in keeping with the applicable regulations and laws of the respective State which permits/regulates Alcohol usage/consumption, along with ensuring necessary protocols in this regard.

VI. Employee's Responsibility

Company believes that each employee shall undertake:

- i. To familiarize themselves with this policy and comply with its provisions.
- ii. To always report to Work Areas free of alcohol or other drugs and their likely effects.
- iii. To seek and accept assistance for alcohol and other drug-abuse-related problems before job performance is affected.
- iv. To support company efforts to eliminate alcohol and Contraband abuse among employees.
- v. To ensure no employee shall engage to supply or induce others to engage/indulge in illegal Contraband use (drugs/alcohol/arms/explosives) in the Work areas.
- vi. Employees who are taking prescription drugs should ensure that they are aware of any side effects and advise their manager or a member of the management team immediately of any side effects of prescription drugs, which may affect work performance or the health and safety of themselves or others.
- vii. To report to Management if any violation is observed against this Policy or Laws in force.

The Company prohibits retaliation against any worker here who reports or participates in an investigation of a violation of Code of Conduct, policies, or the law. If an employee believes that they are being retaliated against, please contact the Values Committee.

The Company urges all employees and all people doing business with the Company to extend support and co-operation in ensuring the provisions of the Policy are fulfilled.
