
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HINDALCO INDUSTRIES LTD. TALOJA WORKS

CERTIFICATE
NUMBER

259

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

LIBERO
ASSURANCE

DATE OF ISSUE

7 MARCH 2023

DATE OF EXPIRY

6 MARCH 2026

CERTIFIED SINCE

7 MARCH 2023

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', written over a horizontal line.

Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
info@aluminium-stewardship.org

*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

The manufacture of Aluminium flat rolled products including lithographic sheet stock, foilstock, finstock and closure stock, at the Talaja Works facility, India.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

| | |
|-------------------------------|---|
| MEMBER NAME | Hindalco Industries Ltd. Taloja Unit |
| ENTITY NAME | Hindalco Industries Ltd. Taloja Works |
| CERTIFICATION SCOPE | The manufacture of Aluminium flat rolled products including lithographic sheet stock, foilstock, finstock and closure stock, at the Taloja Works facility, India. |
| SUPPLY CHAIN ACTIVITIES | <ul style="list-style-type: none">Aluminium Re-melting/RefiningMaterial Conversion (Production and Transformation) |
| ASI STANDARD | <ul style="list-style-type: none">Performance Standard V2 |
| AUDIT TYPE | <ul style="list-style-type: none">Initial Certification Audit |
| AUDIT FIRM | DNV Business Assurance Services UK Ltd. |
| AUDIT DATE | <ul style="list-style-type: none">13 – 16 December 2022 |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">18 January 2023 |
| AUDIT SCOPE | <p>The audit scope includes the manufacture of Aluminium flat rolled products at the Taloja Works facility, India.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningMaterial Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> |
| AUDIT OUTCOME | <ul style="list-style-type: none">Certification |
| AUDIT METHODOLOGY DECLARATION | <p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report. |

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- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 7 March 2023 – 6 March 2026

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 6 September 2024

CERTIFICATE NUMBER 259

SUMMARY OF FINDINGS

| CRITERION | RATING | COMMENT |
|--|-------------|---|
| PRINCIPLE 1 BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | There is a documented procedure explaining the identification of legal requirements, periodic/monthly monitoring meetings chaired by the unit head and the IT tools used. There is a digital compliance system with a "maker and checker system". |
| 1.2 Anti-Corruption | Conformance | The Entity has established a 'Business Value Committee' which is responsible and accountable for anti-corruption. The Committee work against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. Each employee has received training on anti-corruption as part of induction training as well as refresher training. The Entity has a reporting mechanism, including a 'whistleblower' policy to report anti-corruption incidents: https://www.hindalco.com/upload/pdf/hindalco-whistle-blower-policy-19.pdf |
| 1.3 Code of Conduct | Conformance | The Entity has established a Corporate Principle and Code of Conduct, released in August 2022: https://www.hindalco.com/upload/pdf/hindalco-code-conduct.pdf Training is provided to employees on the Code of Conduct, values and anti-Bribery law. |
| PRINCIPLE 2 POLICY & MANAGEMENT | | |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | There are various Policies across the Entity addressing environmental, social and governance (ESG) topics either as incorporated policies or stand alone. The statutory reporting on corporate governance is periodically reported to the regulatory body and Stakeholders: https://www.hindalco.com/investor-centre/governance/corporate-governance-report The Human Rights Policy is available at: https://www.hindalco.com/upload/pdf/human-right-policy.pdf The Environment Policy is available at: https://www.hindalco.com/upload/pdf/hindalco-environment-policy.pdf |
| 2.1b Environmental, Social, and Governance Policy (senior management) | Conformance | The Policies addressing ESG issues are endorsed by unit level management. The required resources, in terms of employees, finance and infrastructure are provided and reviewed monthly. |

| CRITERION | RATING | COMMENT |
|---|-----------------------|--|
| 2.1c Environmental, Social, and Governance Policy (communication) | Conformance | The Policies addressing ESG issues are communicated to internal Stakeholders through display boards and training and to external Stakeholders through material used during corporate social responsibility (CSR) community programs/initiatives and are also available on the website. |
| 2.2 Leadership | Conformance | Senior management commitment has been made and is reflected through the signing of policies. The Entity level Management Representative has been identified as having overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard. The Management Representative is supported by an ASI implementation team and governance structure and reports to the Unit Head. The ASI governance team has been trained on ASI Standards and requirements. |
| 2.3a Environmental and Social Management Systems (environmental) | Conformance | The Entity is third party audited and certified to ISO 14001: https://www.hindalco.com/upload/pdf/certificate/Taloja-Certificate%20IMS%2045K_ISO.PDF |
| 2.3b Environmental and Social Management Systems (social) | Conformance | The Entity has developed social policies/ guidelines for day-to-day operations, as well as other relevant documents such as a certified standing order (rule book) and collective bargaining agreement. Documents are available in the central Human Resources (HR) tools. Hindalco has a 'Great Place to Work' certification in recognition of good HR practices: https://www.hindalco.com/careers/hindalco-certified-a-great-place-to-work#:~:text=Hindalco%20has%20been%20certified%20a,%2D%20Trust%20and%20High%2DPerformance. Awards and recognition for ESG practices are available at: https://www.hindalco.com/about-us/awards-and-recognitions |
| 2.4 Responsible Sourcing | Minor Non-Conformance | The Entity has established responsible sourcing Policies. However, the commitment is not effectively implemented, including: 1. Lack of awareness/training on the 'Responsible Sourcing/Supplier Code of Conduct'. 2. Lack of an effective system to communicate the Supplier Code of Conduct and/or updates. |

| CRITERION | RATING | COMMENT |
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| | | 3. Supplier audits do not fully cover the Supplier Code of Conduct requirements or competency of the personnel undertaking the audit. |
| 2.5 Impact Assessments | Conformance | The Entity has an expansion plan to establish a coating line. As per statutory requirements, an Environment Impact Assessment (EIA) was undertaken that addresses ESG requirements including external Stakeholder consultation (within 10 kilometres), additional water, waste and energy demand. |
| 2.6 Emergency Response Plan | Conformance | The Entity has a detailed on-site Emergency Plan developed and implemented to address important information including the command structure. The emergency scenarios are identified with mitigation measures. The Maximum Credible Loss Scenario (MCLS) has also been conducted by an external expert agency. |
| 2.7 Mergers and Acquisitions | Conformance | The Entity has developed an internal process for Due Diligence as per the internal Environment Social Impact Assessment (ESIA) protocol including merger and acquisition. There has been no merger or acquisition during the past three years. |
| 2.8 Closure, Decommissioning and Divestment | Conformance | The Entity has developed an internal process to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment. There has been no closure, decommissioning and divestment activity during the past three years. |
| PRINCIPLE 3 TRANSPARENCY | | |
| 3.1 Sustainability Reporting | Conformance | The Entity is included in the Group-wide sustainability performance that is disclosed in the corporate sustainability reporting, prepared in accordance with the GRI protocol: https://www.hindalco.com/integrated-annual-report/hindalco-integrated-annual-report-2021-22.pdf |
| 3.2 Non-compliance and liabilities | Conformance | The Entity has disclosed information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in its corporate sustainability reporting. There have been no significant fines, judgments, penalties and non-monetary sanctions: https://www.hindalco.com/integrated-annual-report/hindalco-integrated-annual-report-2021-22.pdf |

| CRITERION | RATING | COMMENT |
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| 3.3a Payments to governments (legal and contractual) | Conformance | The Entity has made payments to governments for applicable taxes e.g., Goods and Service Tax (GST) in India, import duty, and income tax in accordance with legal and other contractual requirements. |
| 3.3b Payments to governments (disclosure - bauxite mining) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.4 Stakeholder complaints, grievances and requests for information | Conformance | There are proactive measures to outreach employees and external Stakeholders to have consultations and to raise concerns. The grievance procedure is also explained in the employees' collective bargaining agreement. A 'whistleblower' policy is available at: https://www.hindalco.com/upload/pdf/hindalco-whistle-blower-policy-19.pdf |
| PRINCIPLE 4 MATERIAL STEWARDSHIP | | |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts) | Conformance | The Entity has evaluated the life cycle impacts of its major products and undertaken a Life Cycle Assessment (LCA) study using the 'Cradle to Gate' methodology as per ISO 14040 and ISO 14044. |
| 4.1b Environmental Life Cycle Assessment (cradle to gate) | Conformance | The Entity has evaluated life cycle impacts and undertaken an LCA study using the 'Cradle to Gate' methodology as per ISO 14040 and ISO 14044. |
| 4.1c Environmental Life Cycle Assessment (public communication) | Conformance | The Entity's LCA related disclosures are presented in the Integrated Annual Report 2021-22, page 50: https://www.hindalco.com/integrated-annual-report/hindalco-integrated-annual-report-2021-22.pdf |
| 4.2 Product design | Conformance | The Entity has a research and development department, 'Hindalco Innovation Centre-HIC', situated in the plant. The Entity utilises 'CLAD scrap' in value added products such as roofing sheet and aluminium circle. |
| 4.3a Aluminium Process Scrap (targets) | Conformance | The Entity's internal Aluminium Process Scrap is 100% collected, segregated as per alloy/grade, re-melted and re-used. |
| 4.3b Aluminium Process Scrap (alloy separation) | Conformance | The internal Aluminium Process Scrap is 100% collected, segregated as per alloy/grade e.g., 8xxx, 3xxx series, re-melted and reused. Process scrap is also received from certain customers as per agreement. There is a re-melting furnace and a recycling furnace. Key performance indicators including melt loss and burner efficiency are tracked monthly and displayed near work areas. |

| CRITERION | RATING | COMMENT |
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| 4.4a Collection and recycling of products at end-of-life (strategy) | Conformance | The Entity has implemented a corporate level strategy to increase the collection and recycling rate. Further information is available in the Integrated Annual Report: https://www.hindalco.com/integrated-annual-report/hindalco-integrated-annual-report-2021-22.pdf |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance | The Entity engages with local recycling systems to increase recycling rates. At a corporate level, there are efforts at regional and national levels to increase recycling rates through policy advocacy engagement, process scrap from customers, and buy back arrangements. |
| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS | | |
| 5.1 Disclosure of GHG emissions and energy use | Conformance | The Entity has calculated Greenhouse Gas (GHG) emissions for both Scope 1 and Scope 2 and energy consumption by source. GHG data are reported at a corporate level in the Integrated Annual Report, page 53: https://hindalco.com/upload/pdf/hindalco-integrated-annual-report-2021-22.pdf |
| 5.2 GHG emissions reductions | Conformance | The Hindalco Group level 'Decarbonization Roadmap' for 2025 has been developed and accordingly GHG Emissions Reduction Plans for the Entity have been developed for the 2025 financial year. Specific measures are being implemented to achieve the 2025 targets, including sourcing renewable energy. |
| 5.3a Aluminium Smelting (management system) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 5.3b Aluminium Smelting (up to and including 2020) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 5.3c Aluminium Smelting (after 2020) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE | | |
| 6.1 Emissions to Air | Conformance | The Entity undertakes stack monitoring in accordance with its 'Consent to Operate' (CTO) issued by the Maharashtra Pollution Control Board. Emissions are checked by an approved external agency. The Entity undertakes air emission testing more frequently and monitors for a broader set of parameters than that required in the CTO. Compliance reports are submitted to the government authorities |

| CRITERION | RATING | COMMENT |
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| | | <p>monthly, along with other environmental performance areas including energy, water and chemicals.</p> <p>The Entity has implemented measures beyond legal requirements to minimise air pollution such as switching to an alternate fuel.</p> <p>Air pollution levels are communicated to Stakeholders and interested parties via an external display board.</p> |
| 6.2 Discharges to Water | Conformance | The Entity complies with the water discharge requirements of its 'Consent to Operate' (CTO) issued by the Maharashtra Pollution Control Board. Treated industrial and domestic wastewater parameters are monitored via an online analyser. |
| 6.3a Assessment and Management of Spills and Leakage (assessment) | Conformance | The Entity has implemented a corporate level procedure and assessed major risk areas of operations to address Spills and Leakage which may contaminate air, water and/or soil. |
| 6.3b Assessment and Management of Spills and Leakage (management) | Conformance | The Entity has developed and implemented a management plan and associated practices to contain and prevent spillages. |
| 6.4a Reporting of Spills (immediate disclosure) | Conformance | The Entity has established a reporting system and practices to report spillage of any nature or location. |
| 6.4b Reporting of Spills (regular reporting) | Conformance | <p>The Entity reports on spills via an annual environment statement and monthly via an environmental performance report that is submitted to local environment authorities. Reporting of spills is also addressed at a corporate level in the Integrated Annual Report:</p> <p>https://www.hindalco.com/integrated-annual-report/hindalco-integrated-annual-report-2021-22.pdf</p> |
| 6.5a Waste management and reporting (strategy) | Conformance | The Entity has developed a procedure for waste management, which addresses the separation of Hazardous and Non-Hazardous Waste, with a focus on waste minimisation at source, in accordance with the Waste Mitigation Hierarchy. |
| 6.5b Waste management and reporting (disclosure) | Conformance | <p>The Entity's waste management reporting is publicly communicated via the Hindalco Group's Integrated Annual Report, page 99:</p> <p>https://hindalco.com/upload/pdf/hindalco-integrated-annual-report-2021-22.pdf</p> |
| 6.6a Bauxite Residue (storage construction) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.6b Bauxite Residue (integrity checks and controls) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |

| CRITERION | RATING | COMMENT |
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| 6.6c Bauxite Residue (water discharge) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.6d Bauxite Residue (marine and aquatic environments) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.6e Bauxite Residue (state of the art technologies) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.6f Bauxite Residue (remediation) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7a Spent Pot Lining (SPL) (storage and management) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7b Spent Pot Lining (SPL) (recovery and recycling) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7c Spent Pot Lining (SPL) (Untreated SPL) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7d Spent Pot Lining (SPL) (review of alternatives) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.7e Spent Pot Lining (SPL) (marine and aquatic environments) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 6.8a Dross (recovery) | Conformance | Dross generated by the remelt and recycle furnaces is sent to an external authorised agency to maximise the recovery of Aluminium by treatment of Dross and Dross residues. |
| 6.8b Dross (recycling) | Conformance | Dross generated by the remelt and recycle furnaces is sent to an external authorised agency to maximise the recycling of treated Dross residues. |
| 6.8c Dross (review of alternatives) | Conformance | The Entity works closely with an external authorised agency which handles Dross residues to explore alternative ways to prevent landfilling. |
| PRINCIPLE 7 WATER STEWARDSHIP | | |
| 7.1a Water assessment (mapping) | Conformance | The Entity has developed a water balance diagram and installed a water flow meter, duly calibrated to measure/monitor water consumption and discharge quantities. |
| 7.1b Water assessment (risk assessment) | Conformance | The Entity has conducted a water risk assessment and implemented mitigation measures within legal conditions. 100% of the treated water from the Entity's Effluent Treatment Plant (ETP) is sent to the industrial area authority (MIDC) ETP. Stormwater collected on site is used for irrigation and in the cooling towers. |

| CRITERION | RATING | COMMENT |
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| 7.2a Water management (management plans) | Conformance | The Entity has implemented the Group-wide Water Stewardship Policy as well as a technical standard for water management. Rainwater from certain rooftops is collected, stored and re-used. The Entity is not in a water-stress zone. |
| 7.2b Water management (monitoring) | Conformance | Daily water consumption is monitored using water flow meters duly calibrated which is further consolidated in monthly reports. The statistical analysis is undertaken for performance improvements and the decision making process on a monthly basis. Specific water consumption (SWC) per tonne of finished goods is tracked with regard to the target. The Entity has a water taskforce that meets monthly. |
| 7.3 Disclosure of water usage and risks | Conformance | The Entity's water related targets, water usage and risk are disclosed in the corporate level Integrated Annual Report - water reduction targets on page 28, and water intensity and recycling on pages 120-121: https://www.hindalco.com/upload/pdf/hindalco-integrated-annual-report-2021-22.pdf The Entity also submits periodic compliance reports to Government authorities which includes monthly water testing reports. |
| PRINCIPLE 8 BIODIVERSITY | | |
| 8.1 Biodiversity assessment | Conformance | The Entity has conducted a Biodiversity assessment and there are no national parks or sanctuaries within a 10 kilometre radius. |
| 8.2a Biodiversity management (biodiversity action plans) | Conformance | The Entity has developed and implemented a biodiversity management plan based on the outcome of the biodiversity assessment. |
| 8.2b Biodiversity management (consultation and mitigation hierarchy) | Conformance | The biodiversity management plan is discussed during apex/unit level sustainability meetings, 'townhall' meetings as well as with the nearby community via the CSR program personnel. |
| 8.2c Biodiversity management (reporting) | Conformance | Biodiversity related disclosures are made through the Hindalco Integrated Annual Report, page 127: https://www.hindalco.com/upload/pdf/hindalco-integrated-annual-report-2021-22.pdf |
| 8.3 Alien Species | Minor Non-Conformance | There is no documented risk assessment of potential impacts from alien and invasive species. In practice, wooden pallets received with import consignment are ensured fumigated as per relevant International Standard for Phytosanitary Measure (ISPM) standards. |

| CRITERION | RATING | COMMENT |
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| 8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines) | Not Applicable | This Criterion is not applicable to the Entity’s Certification Scope. |
| 8.4b Commitment to “No Go” in World Heritage properties (existing mines) | Not Applicable | This Criterion is not applicable to the Entity’s Certification Scope. |
| 8.5a Mine rehabilitation (best available techniques) | Not Applicable | This Criterion is not applicable to the Entity’s Certification Scope. |
| 8.5b Mine rehabilitation (financial provisions) | Not Applicable | This Criterion is not applicable to the Entity’s Certification Scope. |
| PRINCIPLE 9 HUMAN RIGHTS | | |
| 9.1a Human Rights Due Diligence (policy) | Conformance | The Entity adheres to a corporate level Human Rights Policy, revised in August 2022, having a formal commitment to fulfill national and international Human Rights obligations and undertake the necessary Due Diligence: https://www.hindalco.com/upload/pdf/human-right-policy.pdf |
| 9.1b Human Rights Due Diligence (process) | Conformance | The Entity has implemented a ‘Human Rights Risk Register,’ which addresses internal and external business activities including health and safety, along with existing mitigation measures that are implemented and monitored. |
| 9.1c Human Rights Due Diligence (remediation) | Conformance | The Entity has developed adequate remedial measures to handle violations of any Human Rights e.g., complaints grievance mechanism, ‘whistleblower’ policy, and detailed guidelines in the Corporate Code of Conduct. https://www.hindalco.com/upload/pdf/hindalco-code-conduct.pdf https://www.hindalco.com/upload/pdf/hindalco-whistle-blower-policy-19.pdf |
| 9.2 Women’s Rights | Conformance | Human Rights including women’s rights are covered in the corporate Human Right’s Policy: https://www.hindalco.com/upload/pdf/human-right-policy.pdf The specific benefits such as maternity leave are provided for women employees. The Prevention of Sexual Harassment (POSH) Policy and guidelines are documented and made publicly available at: https://www.hindalco.com/upload/pdf/hindalco-posh-policy.pdf There is also a corporate level initiative for women employees "WoWforce": |

| CRITERION | RATING | COMMENT |
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| | | https://wowforce.adityabirla.com/ Training on women's rights is provided via e-learning and in-person. Information such as the POSH Policy and grievance reporting channel is provided on display boards. |
| 9.3 Indigenous Peoples | Not Applicable | This Criterion is not applicable, as there is no presence of Indigenous Peoples or their lands, territories and resources identified. |
| 9.4 Free, Prior, and Informed Consent (FPIC) | Not Applicable | This Criterion is not applicable, as there is no presence of Indigenous Peoples and thus Free, Prior, and Informed Consent (FPIC) is not required. |
| 9.5 Cultural and sacred heritage | Not Applicable | This Criterion is not applicable, as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence. |
| 9.6a Resettlements (avoid or minimise) | Conformance | No Resettlements are being considered or have taken place during the period since the Entity joined ASI. However, the Entity has developed related guidelines on resettlement. |
| 9.6b Resettlements (where unavoidable) | Not Applicable | This Criterion is not applicable, as no Resettlements are being considered or have taken place since the Entity joined ASI. However, the Entity developed related guidelines on resettlement. |
| 9.7a Local Communities (rights and interests) | Conformance | The Entity has established an integrated corporate social responsibility (CSR) approach to serving Local Communities. The CSR projects are designed to meet Stakeholder needs as well as respect the legal and customary rights and interests of Local Communities. |
| 9.7b Local Communities (impacts) | Conformance | <p>The major focus areas of the CSR program include education, health, infrastructure support, and sustainability programs such as tree planting and reducing single use plastic. The Entity recently engaged with a non-government organisation (NGO) for social reform.</p> <p>The Entity has conducted a socio-economic impact assessment as part of the expansion project for the Coating Line.</p> |
| 9.7c Local Communities (livelihoods) | Conformance | The Entity has created a positive impact on the livelihood of Local Communities with job opportunities. This was highlighted by the Local Community (village) heads and villagers, and re-affirmed during worker interviews. |

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| 9.8 Conflict-Affected and High-Risk Areas | Conformance | <p>The Entity has a formal commitment to avoid contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). This is addressed during the Human Rights Due Diligence activities and responsible sourcing deployment, and includes adherence to the Human Rights Policy and Supplier Code of Conduct: https://www.hindalco.com/upload/pdf/human-right-policy.pdf https://www.hindalco.com/upload/pdf/annexure-IVa-hindalco-supplier-code-conduct.pdf</p> <p>The Entity has no business relationships with other entities within CAHRAs.</p> |
| 9.9 Security practice | Conformance | <p>The Entity's security practices are addressed via relevant Human Rights risk assessments. There is a security officer in charge who has overall responsibility for security personnel deployment, duty rosters and leave approval. Security guards are full time employees and members of the trade union.</p> |
| PRINCIPLE 10 LABOUR RIGHTS | | |
| 10.1a Freedom of Association and Right to Collective Bargaining (freedom of association) | Conformance | <p>The Entity has committed to Freedom of Association in its Human Rights Policy. There is one registered Trade Union 'Hindalco Karamchari Sanghatan' at the Entity and Workers have a choice in membership.</p> |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining) | Conformance | <p>The Entity has committed to the rights of Workers to Collective Bargaining in its Human Rights Policy. There is one registered Trade Union 'Hindalco Karamchari Sanghatan'.</p> |
| 10.1c Freedom of Association and Right to Collective Bargaining (alternative means) | Not Applicable | <p>This Criterion is not applicable, as the Entity operates in India where national law does not restrict the right to Freedom of Association and Collective Bargaining.</p> |
| 10.2a Child Labour (minimum age) | Conformance | <p>The exclusion of Child Labour is incorporated in the corporate level Human Rights Policy and includes a formal commitment to fulfill both national and international Human Rights obligations and undertake necessary Due Diligence including Child Labour. The minimum hiring age is 18 years which is implemented through hiring processes and practices, including proof of age verification. No suspected case of Child Labour was found during the audit.</p> |
| 10.2b Child Labour (hazardous) | Conformance | <p>The Entity neither engages in nor supports Hazardous Child Labour in its business activities.</p> |

| CRITERION | RATING | COMMENT |
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| 10.2c Child Labour (worst forms) | Conformance | The Entity neither uses nor supports the use of the Worst Forms of Child Labour and complies with related national and international law. |
| 10.3a Forced Labour (human trafficking) | Conformance | The Entity has developed policies and procedures which state that it will neither engage in nor support the use of Forced Labour or Human Trafficking, either directly or through any employment or recruitment agencies. |
| 10.3b Forced Labour (deposits, fees, advances) | Conformance | The Entity has developed policies and procedures which state that it will neither engage in nor support the use of Forced Labour, and it does not require any form of deposit, recruitment fee or equipment advance from Workers either directly or through employment or recruitment agencies. |
| 10.3c Forced Labour (migrant workers) | Conformance | The Entity has developed policies that state that it will neither engage in nor support the use of Forced Labour, and it does not require any Migrant Workers to lodge deposits or security payments at any time. |
| 10.3d Forced Labour (debt bondage) | Conformance | The Entity has developed policies that state that it will neither engage in nor support the use of Forced Labour, and it does not hold any Workers in Debt Bondage or force them to work in order to pay off a debt. |
| 10.3e Forced Labour (freedom of movement) | Conformance | The Entity has developed policies that state that it will neither engage in nor support the use of Forced Labour, and it does not unreasonably restrict the freedom of movement of Workers in the workplace. |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | The Entity has developed policies that state that it will neither engage in nor support the use of Forced Labour, and it does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates. |
| 10.3g Forced Labour (freedom to terminate employment) | Conformance | The Entity has developed policies that state that it will neither engage in nor support the use of Forced Labour, and it does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length as stated in the employment agreement. |
| 10.4 Non-Discrimination | Conformance | The Entity has developed policies and conducted a Human Rights risk assessment covering Non-Discrimination to ensure equal opportunities and to not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or |

| CRITERION | RATING | COMMENT |
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| | | <p>termination of any Worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination.</p> <p>The Corporate Group is currently developing a diversity and inclusion program, as described in the Integrated Annual Report, page 80: https://www.hindalco.com/upload/pdf/hindalco-integrated-annual-report-2021-22.pdf</p> |
| 10.5 Communication and engagement | Conformance | <p>The Entity has developed an engagement plan with its employees and other external Stakeholders to effectively communicate its policies and programs, which are displayed on the notice board and via discussion at committees and task forces.</p> <p>There is a corporate driven Organisation Effectiveness (OE) calendar. Employee engagement activities have been undertaken. Also, Stakeholder meetings such as the canteen committee and Contractors, are undertaken quarterly.</p> |
| 10.6 Disciplinary practices | Conformance | <p>The Entity has a certified standing order as per statutory requirements, in which detailed statutory disciplinary practices are displayed in work areas for employees.</p> |
| 10.7a Remuneration (living wage) | Conformance | <p>The living wage calculation has been conducted, which has considered a district/local socio-economic analysis. The minimum wage paid by the Entity is higher than the calculated living wage.</p> |
| 10.7b Remuneration (method of payment) | Conformance | <p>Monthly salaries are paid on the last working day of each month via bank transfer. The Overtime payment is made at a premium rate (i.e., 200% for weekdays) along with salary as applicable. Payslips are emailed to each employee.</p> |
| 10.8 Working Time | Conformance | <p>The working hours are recorded, including for Contractors and security personnel, through biometric machines. The working hours are as per national laws. There are public and national holidays as per legal requirements plus sick leave, casual leave, and privileged leave, as per rules. Employees working on public holidays are entitled to a premium payment as per legal norms. The Overtime analysis is undertaken monthly. The Entity complies with applicable national laws and the in-force Collective Bargaining Agreement.</p> |

| CRITERION | RATING | COMMENT |
|---|-------------|--|
| 11.1a Occupational Health and Safety (OH&S) Policy (policy) | Conformance | The Entity has documented its Occupational Health and Safety (OH&S) Policy, which is disseminated to the workforce via display and training, and is available at: https://www.hindalco.com/upload/pdf/safety-and-occupational-health-policy.pdf |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors) | Conformance | The Entity has documented its OH&S Policy, which includes reference of its applicability to the workforce and visitors. Periodic safety training is provided on the policy. All visitors undergo a mandatory safety briefing covering the policy and safety precautions required: https://www.hindalco.com/upload/pdf/safety-and-occupational-health-policy.pdf |
| 11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards) | Conformance | The Entity has documented within its OH&S Policy a commitment to respect and implement national and international laws on Worker health and safety, as applicable. |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work) | Conformance | The Entity has documented within its OH&S Policy a commitment to respect the Workers' right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. |
| 11.2 OH&S Management System | Conformance | The Entity is certified to ISO 45001, valid until 2023. There is an Integrated Management System manual addressing ISO 45001:2018 requirements supported by health, safety and environment (HSE) procedures. Employees and Contractors have received training on OH&S topics. |
| 11.3 Employee engagement on health and safety | Conformance | The Entity has established a safety committee comprising of management and Workers from various departments. The Entity has also developed a safety training plan for employees on various topics including health and safety. |
| 11.4 OH&S performance | Conformance | The Entity has established key performance indicators (KPI's) including the number of minor accidents, reportable accidents and Lost Time Accident Rate (LTAR). The Entity evaluates and monitors its OH&S performance through periodic monitoring of KPIs and internal and external audits. |

Document Control and Version History

| Revision | Date | Notes |
|----------|--------------|--|
| 0 | 7 March 2023 | Initial Certification Audit – Full Certification |