
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**HINDALCO
INDUSTRIES LTD
(HIRAKUD FRP)**

CERTIFICATE
NUMBER

245

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

LIBEROASSURANCE

DATE OF ISSUE

22 DECEMBER 2022

DATE OF EXPIRY

21 DECEMBER 2025

CERTIFIED SINCE

22 DECEMBER 2022

AUTHORISED BY

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

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CERTIFICATION SCOPE

Manufacturing and supply of Unalloyed and Alloyed Aluminium flat rolled products (plate coils & sheets) at Hindalco Industries Ltd (Hirakud FRP) (India).

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

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	HINDALCO INDUSTRIES LTD (HIRAKUD FRP)
ENTITY NAME	Hindalco Industries Ltd (Hirakud FRP)
CERTIFICATION SCOPE	Manufacturing and supply of Unalloyed and Alloyed Aluminium flat rolled products (plate coils & sheets) at Hindalco Industries Ltd (Hirakud FRP) (India).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	LiberoAssurance
AUDIT DATE	<ul style="list-style-type: none">8 – 13 September 2022
AUDIT SCOPE	<p>The audit scope covers the manufacturing and supply of Unalloyed and Alloyed Aluminum flat rolled products (plate coils & sheets) at Hindalco Industries Ltd (Hirakud FRP).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>All relevant criteria in the ASI Performance Standard are 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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<input checked="" type="checkbox"/> 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.

CERTIFICATION PERIOD 22 December 2022 – 21 December 2025

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 21 December 2023

CERTIFICATION NUMBER 245

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has identified applicable legal requirements and established a practice of periodical monitoring of legal compliance status.
1.2 Anti-Corruption	Conformance	The Entity has established a 'business value committee' which is responsible and accountable for anti-Corruption. Each employee has undergone training on anti-Corruption as part of the induction training program and refresher training. https://www.hindalco.com/upload/pdf/hindalco-whistle-blower-policy-19.pdf
1.3 Code of Conduct	Conformance	The Entity has implemented a Corporate Principle and Code of Conduct and training for employees on the principle and Code. https://www.hindalco.com/upload/pdf/hindalco-code-conduct.pdf
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has implemented various policies covering Environmental, Social, and Governance (ESG) topics as part of other Policies or standalone. The statutory reporting on corporate governance is reported periodically to regulatory bodies and is available to Stakeholders at: https://www.hindalco.com/investor-centre/governance/corporate-governance-report Human Rights Policy: https://www.hindalco.com/upload/pdf/human-right-policy.pdf Environment Policy: https://www.hindalco.com/upload/pdf/hindalco-environment-policy.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has designated senior management at the corporate level to approve the ESG Policies. At the Entity level, the necessary communication and resources are provided to implement Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated the ESG Policies to internal and external Stakeholders

CRITERION	RATING	COMMENT
		<p>through various means such as the notice board, periodic training, and the website. https://www.hindalco.com/investor-centre/policies</p>
2.2 Leadership	Conformance	<p>The Entity's senior management has demonstrated their commitment by signing the Policies. It has nominated a Management Representative having the overall responsibility and authority for ensuring conformance with the ASI Performance Standard. https://www.hindalco.com/upload/pdf/human-right-policy.pdf</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has valid ISO 14001 and ISO 45001 Certifications. https://www.hindalco.com/upload/pdf/certificate/Hirakud-QMS-OHSAS-EMS-ENGUS-UKAS-MUM00000359-FRP_Transition-ISO.pdf</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has implemented social Policies and established guidelines for day-to-day operations as part of it is Social Management System (e.g., Standard Operational Procedures for Office Time, Payroll, compensation management and Contract labour Management). https://www.hindalco.com/careers/hindalco-certified-a-great-place-to-work#:~:text=Hindalco%20has%20been%20certified%20a,%2D%20Trust%20and%20High%2DPerformance</p>
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity has established Responsible Sourcing commitments and Policies, and at the group level it has established a Supply Chain and Procurement Policy: https://sustainability.adityabirla.com/images/Supply%20Chain%20and%20Procurement%20Policy.pdf Supplier Code of Conduct: https://www.hindalco.com/upload/pdf/annexure-IVa-hindalco-supplier-code-conduct.pdf The Purchase and Sourcing team are trained regarding recent changes in the Supplier Code of Conduct and other relevant Policies. However, it was identified there were no supplier audit records available to demonstrate conformance with the internal</p>

CRITERION	RATING	COMMENT
		policy for Tier 1 suppliers according to the requirements of Supply Chain and Procurement Policies.
2.5 Impact Assessments	Conformance	The Entity has established a documented Capital Expenditure (CAPEX) Management System. Each CAPEX project has undergone an Impact Assessment and evaluation that included ESG and other requirements.
2.6 Emergency Response Plan	Conformance	The Entity has implemented an on-site emergency plan with a command structure outlining the responsibilities for communication and coordination with public authorities. The Entity performs emergency drills twice a year and records are maintained.
2.7 Mergers and Acquisitions	Conformance	The Entity has developed an internal process for Due Diligence according to the internal Environment Social Impact Assessment (ESIA) protocol that includes mergers and acquisitions. No mergers and acquisitions have occurred within the last three years.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has developed an internal process to review ESG issues as part of the planning process for closure, decommissioning and divestment. No closure, decommissioning or divestment has occurred within the last three years.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity had disclosed its Group wide sustainability performance as part of corporate Sustainability Reporting in accordance with the Global Reporting Initiative (GRI) protocol, available at: http://www.hindalco.com/upload/pdf/hindalco-integrated-annual-report-2020-21.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity has disclosed significant fines, judgments, penalties, and non-monetary sanctions for failure to comply with Applicable Law in its corporate Sustainability Reporting. There are no significant fines, judgments, penalties, and non-monetary sanctions. http://www.hindalco.com/upload/pdf/hindalco-integrated-annual-report-2020-21.pdf

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	The Entity makes 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 contractual basis. The Entity has implemented anti-Corruption Policies and procedures which are periodically subjected to internal and statutory audits.
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	The Entity has established a documented grievance mechanism and is available to internal and external Stakeholders. 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 its Life cycle impacts and carried out Life Cycle Assessment (LCA) study using the Cradle to Gate methodology according to ISO 14040/44.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has evaluated the Life cycle impact and carried out the LCA study using the Cradle to Gate methodology according to ISO 14040/44.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has disclosed LCA related information within its 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 established a documented procedure covering product design for both existing and new Products. Sustainability attributes are part of design guidelines such as process/product improvements or limiting the use of paper, wooden pallets for packaging etc.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity sends 100% of the Process Scrap to the Casthouse (group Entity) in the Hirakud cluster which is used as secondary aluminium/recycle content in new slab casting and sent back by the Entity. There

CRITERION	RATING	COMMENT
		are initiatives under implementation to reduce Process Scrap and improve recovery.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity identifies and segregates Process Scrap mainly into different grades. There are initiatives under implementation to reduce Process Scrap and improve recovery.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	There is a corporate-level strategy to increase the collection and recycling rate. The relevant part of the recycling strategy (including targets) is implemented at the Entity level (e.g., 100% Process Scrap is collected and recycled).
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>There is a corporate level strategy to increase the collection and recycling rate including engagement with various Stakeholders. More information is available in the Integrated Annual Report 2021-22, page 60: https://www.hindalco.com/integrated-annual-report/index.html</p> <p>At the corporate level, there are efforts at a regional and national level to increase the recycling rates through policy advocacy engagement, Process Scrap from the customer, buy-back arrangements etc. At the Entity level, efforts are made to engage with local recycling ecosystems to increase recycling rates.</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity has determined Scope 1 and Scope 2 Greenhouse Gases (GHG) and energy consumption by source. These GHG data are reported at the corporate level in the Integrated Annual Report 2021-22, page 53: https://hindalco.com/upload/pdf/hindalco-integrated-annual-report-2021-22.pdf</p> <p>The Entity underwent an energy audit through an external agency to identify energy-saving potential. The recommendations were reviewed and implemented in a prioritised manner. There are multiple energy-saving projects either completed or in progress.</p>
5.2 GHG emissions reductions	Conformance	There is a corporate and group-wide GHG reduction target of 25% (aggregate) by 2025 from the base year of FY 2011-12 which is

CRITERION	RATING	COMMENT
		further distributed at the plant level based on potential. This public disclosure is available in the Integrated Annual Report 2021-22, page 53: https://hindalco.com/upload/pdf/hindalco-integrated-annual-report-2021-22.pdf
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 conducts continuous stack monitoring specific to the air emissions relevant to the State Pollution Control Board. The Entity makes efforts to minimise air pollution beyond compliance to legal requirements through measures such as converting to alternate fuels with lower air emission potential. Air pollution levels are communicated to Stakeholders and interested parties following statutory norms including continuous stack (air emission) monitoring, and the external display board.
6.2 Discharges to Water	Conformance	The Entity is a Zero Liquid Discharge (ZLD) plant. There is an on-site effluent treatment plan, and the effluent outlet is continuously monitored and is connected to the state pollution control board covering parameters like Biological Oxygen Demand (BOD), and Chemical Oxygen Demand (COD).
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has implemented a corporate-level procedure to assess the major risk areas of its operations where Spills and Leakage may contaminate air, water and/or soil.
6.3b Assessment and Management of Spills and Leakage (management)	Minor Non-Conformance	The Entity has established a management plan and associated practices to contain and prevent spillages. However, it was identified during site observations there was a spillage of oil within the Hot mill area.

CRITERION	RATING	COMMENT
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has implemented an internal reporting computer-based tool to disclose Spills and Leakages immediately to internal and/or external Stakeholders with relevant information such as location, area owner, photograph, and description of spillage in accordance with related procedural and statutory guidelines. The system has a follow-up and tracking mechanism. There have been no significant Spills or Leakages within the past year.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has implemented an internal reporting tool 'Abnormality' to report Spills and Leakage of any nature and location.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has established a procedure with a focus on waste management and minimisation at source in accordance with the Waste Mitigation Hierarchy.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity's waste management reporting is group-wide and is available within the Integrated Annual Report 2021-22, page 99: https://hindalco.com/upload/pdf/hindalco-integrated-annual-report-2021-22.pdf
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.
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 (start 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.

CRITERION	RATING	COMMENT
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)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	The Entity implements water stewardship programs that cover the analysis of water withdrawal and use by source and type which is identified and mapped.
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water risk assessment and has formed a water task force comprising of a cross-function team of employees.
7.2a Water management (management plans)	Conformance	The Entity has conducted a water assessment and developed a mitigation program. Water-related risks such as availability and water quality were identified, and mitigation measures were implemented.
7.2b Water management (monitoring)	Conformance	The Entity maintains daily water leakage and records and consolidates water consumption data monthly.
7.3 Disclosure of water usage and risks	Conformance	The Entity has disclosed its water usage to internal and external Stakeholders (e.g., daily water reports internally and the communication board at the main entrance are updated on monthly basis). Water use and associated risks are disclosed in the annual environment statement submitted to Government authorities and at a group level within the Integrated Annual Report 2021-22, page 118:

CRITERION	RATING	COMMENT
		https://www.hindalco.com/integrated-annual-report/hindalco-integrated-annual-report-2021-22.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has conducted a Biodiversity assessment. There is no national park or sanctuary within a ten kilometre radius of the study area. Only Hirakud Dam, a large body of water is located close to the plant. The Study addresses flora and fauna covering faunal terrestrial species, mammals, species of reptiles, species of avifauna, amphibian species of aquatic fauna) within a ten kilometre radius of the study area.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has developed a Biodiversity Sensitivity and Management Plan with the support of an external agency. The Biodiversity management plan has defined a Greenbelt development plan with further detail on the types of plants, selection criteria and a yearly development plan.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has developed a Biodiversity management plan which has been consulted with relevant internal and external Stakeholders with the support of an agency who had conducted the Biodiversity assessment, to communicate the biodiversity status quo and actions required.
8.2c Biodiversity management (reporting)	Conformance	The Entity has disclosed its biodiversity-related performance and plans within the Integrated Annual Report 2021-22, pages 121-127: http://www.hindalco.com/upload/pdf/hindalco-integrated-annual-report-2020-21.pdf
8.3 Alien Species	Conformance	The Entity has conducted a risk assessment for Alien Species. The wooden pallets received are fumigated according to International Standard for Phytosanitary Measure (ISPM) standards.
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 operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.

CRITERION	RATING	COMMENT
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 has implemented a corporate-level Human Rights Policy with a formal commitment to fulfil national and international Human Rights obligations and carry out necessary Due Diligence. The Entity has established a 'Human Rights Risk Identification and Management' process covering internal and external activities which may impact Human rights.
9.1b Human Rights Due Diligence (process)	Conformance	The Entity adheres to the established group-wide 'Human Rights Due Diligence' guidelines which provide information on how to identify, prevent, mitigate, and account for how the Entity addresses its actual and potential impacts on Human Rights.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity adheres to the established group-wide 'Human Rights Due Diligence' guidelines which provide information about remediation actions and account for how the Entity addresses its actual and potential impacts on Human Rights.
9.2 Women's Rights	Conformance	The Entity has implemented the corporate-level Human Rights Policy which addresses Women's Rights: https://www.hindalco.com/upload/pdf/human-right-policy.pdf Prevention of Sexual Harassment: https://www.hindalco.com/upload/pdf/hindalco-posh-policy.pdf There is a corporate level initiative for women employees 'WoWforce': https://wowforce.adityabirla.com
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples within the Entity's Area of Influence.

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable, as there is no presence of cultural and sacred heritage sites within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Conformance	The Entity has established related guidelines for resettlements. However, no resettlements are being considered or have taken place since joining ASI.
9.6b Resettlements (where unavoidable)	Conformance	The Entity has established related guidelines for resettlements. However, no resettlements are being considered or have taken place since joining ASI.
9.7a Local Communities (rights and interests)	Conformance	The Entity has established an integrated Corporate Social Responsibility (CSR) approach to serving Local Communities. The Corporate Social Responsibility (CSR) projects are based on four pillars i) health and hygiene ii) income generation iii) Sports and Education and iv) Infrastructural development.
9.7b Local Communities (impacts)	Conformance	The villages (Christian Pada and Nimpali) outside of the plant boundary are recipients of the CSR projects which are designed to meet their needs. The implementation, financial and physical progress are regularly monitored.
9.7c Local Communities (livelihoods)	Conformance	The Entity is active in community engagement with some of the CSR activities including education support, health and hygiene, municipal waste collection, agriculture farm equipment, a mobile dispensary, and a sports ground.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has made a commitment to avoiding contribution to armed conflict or Human Rights abuses in Conflict-Affected Areas and High-Risk Areas (CAHRAs). The Entity has implemented related Policies regarding CAHRAs: https://www.hindalco.com/upload/pdf/human-right-policy.pdf Supplier Code of Conduct: https://www.hindalco.com/upload/pdf/annexure-IVa-hindalco-supplier-code-conduct.pdf

CRITERION	RATING	COMMENT
9.9 Security practice	Conformance	The Entity has conducted a Human Rights risk assessment where security practices were included. The Entity undertakes necessary measures like Human Rights risk assessment covering security practices/services and its monthly monitoring and verification of Human Rights compliance documentation. There is an agreement with the security service provider that is documented and compliance with its terms and conditions is periodically checked (e.g., monthly verification of working hours, wages, and social benefits provident fund, employees' state insurance).
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has included Freedom of Association and the right of Collective Bargaining as part of the Human Rights policy. There is a recognised union, 'Hindalco Hiralco FRP Works Employees Union' whose members were elected through secret ballot means in presence of a Government labour officer.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has included the right of Collective Bargaining as part of the Human Rights policy.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as Indian law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity prohibits the use of Child Labour and is included within the corporate-level Human Rights policy, with a formal commitment to fulfil national and international Human Rights obligations and carry out necessary Due Diligence. The Entity does not allow anyone less than 18 years of age to enter the plant premises. The proof of age is recorded in the employment file.
10.2b Child Labour (hazardous)	Conformance	The Entity neither use nor support the use of Child Labour in Hazardous processes and complies with related National and International law.
10.2c Child Labour (worst forms)	Conformance	The Entity neither use nor support the use of Child Labour in Hazardous processes and

CRITERION	RATING	COMMENT
		complies with related National and International law.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has implemented Human Resources Policies and procedures that prohibit the use of Forced Labour, and it does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies. This was verified through a review of employment records and Workers' interviews.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has implemented Human Resources Policies and procedures to ensure that it neither engages in nor supports the use of Forced Labour and does not require any form of deposits.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has implemented Human Resources Policies to ensure that it neither engages in nor supports the use of Forced Labour and 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 implemented Human Rights Policies to ensure that it neither engages in nor supports the use of Forced Labour and does not require any Workers in Debt Bondage.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has implemented Human Rights Policies to ensure that it neither engages in nor supports the use of Forced Labour and 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 implemented Human Rights Entity Policies to ensure that it neither engages in nor supports the use of Forced Labour and does not practice the retention of 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 implemented Human Rights Policies to ensure that it neither engages in nor supports the use of Forced Labour and does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable

CRITERION	RATING	COMMENT
		length as stated in the employment agreement.
10.4 Non-Discrimination	Conformance	The Entity has implemented Human Right Policies and conducted a Human Rights risk assessment covering 'Non-Discrimination' to ensure equal opportunity and not to engage in or support Discrimination. This was verified through the review of training, promotion, wages etc and Workers' interviews.
10.5 Communication and engagement	Conformance	The Entity has communicated its Policies and programs through displays on noticeboards and via committees (e.g., works committee, safety committee). The Entity has developed a communication and engagement plan for 2022-23 and a corporate manual for employee engagement and communication (e.g., quarterly town hall meetings, and skip-level meetings).
10.6 Disciplinary practices	Conformance	The Entity adheres to statutory disciplinary practices, and this is displayed in the work area. The Entity has established a Standard Operating Procedure (SOP) for taking disciplinary actions such as misconduct. The disciplinary grounds are also covered in the trade union agreement and are agreed to by Government authorities.
10.7a Remuneration (living wage)	Conformance	The Entity has conducted a living wage study through a Workers' survey to understand their food habits, and expenses on food, clothing, education, transportation, energy cost, health etc. including a district/local socio-economic analysis. The Entity is paying equal to or above the estimated living wage.
10.7b Remuneration (method of payment)	Conformance	The Entity pays the monthly salary by the seventh working day of the next month for the preceding month via bank transfer. Overtime payments are made at a premium rate along with the salary. Detailed wage slips are issued as a paper copy.
10.8 Working Time	Conformance	The Entity has complied with applicable national laws and the Collective Bargaining agreement covering Working Time. Working hours are recorded through biometric machines.

CRITERION	RATING	COMMENT
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Policy. 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 makes the OH&S Policy applicable to its workforce and other Stakeholders such as customers, suppliers, and Visitors. Periodic safety training is provided covering one or more aspects and commitments expressed in OH&S Policy. All the Visitors undergo a mandatory briefing covering safety Policy and safety precautions. 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 Workers' health and safety, as applicable.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has documented its OH&S Policy with a commitment to respect Workers' right to understand and have the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity has a valid ISO 45001 Certification: https://www.hindalco.com/upload/pdf/certificate/Hirakud-QMS-OHSAS-EMS-ENGUS-UKAS-MUM00000359-FRP_Transition-ISO.pdf . The Entity has established an Integrated Management System Manual covering ISO 45001:2018 requirements supported by procedures and work instructions.
11.3 Employee engagement on health and safety	Conformance	The Entity has a safety committee comprising of both management representatives and Workers from various departments.
11.4 OH&S performance	Conformance	The Entity has established key performance indicators (KPIs) for the number of minor accidents, reportable accidents, and lost time accident rates. The Entity evaluates and monitors its Health and Safety performance through periodic monitoring of KPIs and internal and external audits.

Document Control and Version History

Revision	Date	Notes
0	22 December 2022	Initial Certification Audit – Full Certification