

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

VEDANTA LIMITED

ALUMINIUM BUSINESS (SEZ SMELTER- JHARSUGUDA)

CERTIFICATE
NUMBER

279

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

CETIZION
VERIFICA

DATE OF ISSUE

14 APRIL 2023

DATE OF EXPIRY

13 APRIL 2026

CERTIFIED SINCE

14 APRIL 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

Manufacture and supply of all primary aluminium product in the form of billets, wire rod, primary foundry alloys (PFA), ingot and sow from the Vedanta Aluminium Smelter located within the Special Economic Zone (SEZ) at Jharsuguda, Odisha, India. This also includes low carbon primary Aluminium, i.e. Restora and Restora Ultra.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Vedanta Limited (Aluminium Business)
ENTITY NAME	Vedanta Limited Aluminium Business (SEZ Smelter – Jharsuguda)
CERTIFICATION SCOPE	Manufacture and supply of all primary aluminium product in the form of billets, wire rod, primary foundry alloys (PFA), ingot and sow from the Vedanta Aluminium Smelter located within the Special Economic Zone (SEZ) at Jharsuguda, Odisha, India. This also includes low carbon primary Aluminium, i.e. Restora and Restora Ultra.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Certification Audit
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none">24 February – 3 March 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">27 March 2023
AUDIT SCOPE	<p>The audit scope includes the manufacture and supply of all primary aluminium product in the form of billets, wire rod, primary foundry alloys (PFA), ingot and sow from the Vedanta Aluminium Smelter located within the Special Economic Zone (SEZ) at Jharsuguda, Odisha, India. This also includes low carbon primary Aluminium, i.e. Restora and Restora Ultra. The audit scope also includes the captive power plant.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthousesSemi-Fabrication

All relevant criteria in the ASI Performance Standard were included in the audit scope

AUDIT
OUTCOME

- Certification
-

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
 - 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.
-

CERTIFICATION
PERIOD

14 April 2023 – 13 April 2026

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

13 October 2024

CERTIFICATE
NUMBER

279

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has an independent legal team reporting to CEO with allocated responsibilities. There is a Vedanta group level 'Compliance Framework Policy', last reviewed in 2021. The associated procedure details implementation guidelines, cut-off dates for compliance reporting as well as yearly legal compliance audits by a third party. There is an IT based compliance tool, which captures periodic legal updates and is then assigned to each responsible function.</p> <p>The periodic updates with regard to applicable legal requirements are received from external law experts (agency).</p>
1.2 Anti-Corruption	Conformance	<p>The Entity's Code of Business Conduct and Ethics addresses the Anti-Corruption Policy and procedure: https://www.vedantalimited.com/uploads/corporate-governance/policies_practices/Code-of-Business-Conduct-and-Ethics-Eng.pdf</p> <p>It is provided in three languages (English, Hindi and Marathi). There is a centralised compliance officer which sends periodic emails e.g., with a link to the Code of Conduct and gift declaration portal.</p>
1.3 Code of Conduct	Conformance	<p>The Entity's Code of Business Conduct and Ethics is available at: https://www.vedantalimited.com/uploads/corporate-governance/policies_practices/Code-of-Business-Conduct-and-Ethics-Eng.pdf.</p> <p>Employees receive training at the time of hiring as well as a periodic refresher. There is a centralised compliance officer which sends periodic emails to staff reminding them of the Code of Conduct and the gift declaration portal.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has established and implemented Environmental, Social, and Governance (ESG) policies as well their performance monitoring and governance mechanism, available at: https://www.vedantalimited.com/eng/esg-governance.php There are stand-alone policies for areas including social, Health Safety & Environment (HSE), Energy and Carbon, Biodiversity, and are available at: https://www.vedantalimited.com/uploads/esg/esg-</p>

CRITERION	RATING	COMMENT
		sustainability-framework/Social-Published.pdf https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/Vedanta-HSE-Policy.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's senior management team endorse and support various ESG policies and programs through the provision of resources and regularly review the progress.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated its various ESG policies through periodic training, presentation within production areas and external communication via its website at: https://www.vedantalimited.com/eng/esg-sustainability-framework.php
2.2 Leadership	Conformance	The leadership commitment demonstrates the implementation and provides resources for ASI Performance Standard requirements. ASI responsibilities have been assigned to various disciplinary areas including Environment, Safety, Human Resources, Corporate Social Responsibility as well as other ASI criteria.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has established an Environment Management System, third party certified to ISO 14001:2015. An overview of the Management System is available at: https://www.vedantalimited.com/eng/esg-sustainability-framework.php
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has developed a Human Rights Policy having reference to UN Guiding Principles on Business and Human Rights, UN Universal Declaration on Human Rights and other international instruments. Indian labour laws are communicated to Stakeholders through display, periodic reviews are carried out to check progress (e.g., social security, provident fund and employees' state insurance), and obligation by Contractors and employees are undertaken monthly by the Human Resources department.
2.4 Responsible Sourcing	Conformance	The Entity's parent company has developed a Supplier Code of Conduct. https://www.vedantaresources.com/InvestorRelationDoc/Supplier%20Code%20of%20Conduct_May%202022.pdf The Group-level policy 'Supplier and Business Partner Sustainability Management Policy' is available at:

CRITERION	RATING	COMMENT
		<p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Supplier-and-Contractor-Sustainability-Management-Policy-2022.pdf</p> <p>The initial approval process collects sustainability related data from potential suppliers and evaluated from a risk perspective for financial risk, governance, litigation and default risk, regulatory risk, reputation risk and sustainability risk. The purchase order terms and conditions include issues such as sanctions and trade embargoes. The Entity promotes the localisation of vendors as part of its sustainability initiatives. Training is provided to sourcing team members on ESG requirements.</p>
2.5 Impact Assessments	Conformance	<p>There is a proposed expansion of the smelter from 1.6 Million Tonnes per Annum (MTA) to 1.8 MTA. The project capacity expansion details are assessed as per the provision of Environment Impact Assessment (EIA) notification 2006 which addresses ESG impacts.</p> <p>The approval from the Ministry of Environment, Forest and Climate Change was received in May 2022: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/05/EC-Aluminium-Smelter-16-to-18-LTPA-Jharsuguda.pdf</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has implemented a documented emergency plan with required communication, training and periodic drills. There are in-house fire stations as well as a flood control centre. The QR code-based inspection of fire extinguishers is implemented and fire tenders, and vehicles are GPS tracked. There is a full-time control room to check and manage fire safety management. Closed circuit monitoring is undertaken in areas of high fire risk (e.g., bulk fuel storage areas and the Anode plant). There are efforts to train female employees in fire safety called "Agnivahini". There is a monthly fire safety audit for each area.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity relies upon corporate level guidelines for merger and acquisition activities. There has been no merger and acquisition activity affecting the Entity since becoming an ASI Member. The related guidelines are publicly available at: https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/Acquisitions-Divestment-and-Joint-Ventures-Due-Diligence.pdf</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity relies upon corporate level guidelines for closure and divestment activities. There has been</p>

CRITERION	RATING	COMMENT
		no closure and divestment activity affecting the Entity since becoming an ASI Member The related guidelines are publicly available at: https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/New-Projects-Planning-Processes-and-Site-Closure.pdf
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity has published a Sustainability Report since 2008-09. The latest Sustainability Report available is for 2021-22. https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/VEDL-SR-FY2022.pdf Other sustainability topic reporting is also publicly available: https://www.vedantalimited.com/SiteAssets/Images/TCFD-FY2022.pdf https://www.vedantalimited.com/MediaDocuments/Vedanta%20Limited%20-%20TTR%20-%20FY%202021-22.pdf https://www.spglobal.com/esg/scores/results?cid=4354101 https://www.vedantalimited.com/eng/esg-reporting.php
3.2 Non-compliance and liabilities	Conformance	There were no significant fines, judgments, penalties and non-monetary sanctions identified.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity makes payments to government for statutory tax and applicable payments which include major payments such as corporate tax, and social benefits like provident fund and customs duties. https://www.vedantalimited.com/MediaDocuments/Vedanta%20Limited%20-%20TTR%20-%20FY%202021-22.pdf
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 various channels to report any grievances related to Human Rights or other matters. The training and communication on the grievance mechanism through induction training and a large scale interaction program (LSIP). It is also addressed in the Code of Business Conduct and Ethics, publicly available at: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Code-of-Business-Conduct-and-Ethics-Eng.pdf There is a complaint register room at the plant's

CRITERION	RATING	COMMENT
		main gate with visible signage. In the case of external Stakeholders, there is a structured Stakeholder engagement process that details the grievance redressal mechanism along with other engagement matrix (e.g., Stakeholder, priority, actions required, frequency, mode of communication, time frame, anchor, responsible department and records),
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has assessed the environmental performance of aluminium products (all product mix equivalent to one tonne of Primary Aluminium) by conducting a full Life Cycle Assessment (LCA) according to the ISO 14040/14044 methodology within the approach of cradle-to-gate with modules C4- D with A1-A2-A3.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has assessed the environmental performance of aluminium products (all product mix equivalent to one tonne of Primary Aluminium) by conducting a full LCA according to the ISO 14040/14044 methodology within the approach of cradle-to-gate with modules C4-D with A1-A2-A3.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity provides required information of its LCA results and other related information including Environment Product Declaration (EPD) to interested parties including customers via marketing team members and other concerned team members.
4.2 Product design	Conformance	The Entity has a Research and Development (R&D) function that identifies the opportunity for improvement to a product as well as process improvements with key objectives to increase resource efficiency, environmentally friendly product features and waste minimisation.
4.3a Aluminium Process Scrap (targets)	Conformance	The Aluminium Process Scrap primarily includes end pieces cut of billets and rejected materials that are segregated, all re-melted and reused. The daily grade details are maintained and monitored. The Entity is also working on process scrap reduction through initiatives like standardisation of process parameters, metallurgy control and sizing in order to reduce process rejections.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Process scrap is segregated by material grade and inventory records are updated daily and compiled

CRITERION	RATING	COMMENT
		monthly for the total amount of process scrap generated (by grade) and recycled/remelted.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>The Entity supplies Primary Aluminium in cast forms to its global customers, the company is following the recycling of products (waste) containing aluminium.</p> <p>The Entity has recently announced a joint initiative with a government authority to develop an 'Aluminium Park' nearer to its existing facility as a new legal identity with an objective to promote recycling and buy back from user industries.</p> <p>https://vedantaaluminium.com/media/press-releases/list/make-in-odisha-2022-honble-cm-of-odisha-inaugurates-vedanta-aluminium-park-at-jharsuguda/</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>The Entity has recently announced a joint initiative with a government authority to develop an 'Aluminium Park' nearer to its existing facility as a new legal identity with an objective to promote recycling and buy back from user industries.</p> <p>https://vedantaaluminium.com/media/press-releases/list/make-in-odisha-2022-honble-cm-of-odisha-inaugurates-vedanta-aluminium-park-at-jharsuguda/</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>The Entity manufactures Low Carbon Primary Aluminium (Restora and Restora Ultra brand):</p> <p>https://vedantaaluminium.com/products/restora-low-carbon-aluminium/</p> <p>The Procedure for 'green aluminium' is documented for the calculation and designation of 'Green Aluminium' (Restora brands). The threshold Greenhouse Gases (GHG) intensity value for these products is set below 4.5 T CO₂/tonne of Aluminium and actual GHG intensities (Scope 1 and 2) in the range of 2-2.5 T CO₂/tonne of Aluminium. This is achieved using renewable energy. Third party verification has been undertaken for these GHG emissions claims.</p> <p>The GHG intensities for the entire product mix are disclosed publicly in the Entity's Sustainability Reports.</p>
5.2 GHG emissions reductions	Conformance	<p>The Entity has developed GHG reduction plans:</p> <p>http://mercomindia.com:8080/vedanta-source-691-mw-renewables-open-access/</p> <p>A 14% reduction target of GHG (Scope 1 and 2)</p>

CRITERION	RATING	COMMENT
		<p>emissions by Financial Year (FY) 2025 and 28% by FY 2030 with a baseline of FY2020-21.</p> <p>To date, the Entity has reduced GHG emissions and intensity (Scope 1 and 2) by 24% against the baseline year of 2012. The reduction in the previous two years is approximately 13%.</p> <p>Some of the plant level initiatives include the transition to a 100% electric forklift/light motor vehicle by 2030, the installation of a solar rooftop generating 150 MW and working towards higher purchase and use of renewable energy.</p> <p>The GHG reduction plan until the year 2030 is disclosed in the Task Force on Climate related Financial Disclosures (TCFD) Report: https://www.vedantalimited.com/SiteAssets/Images/TCFD-FY2022.pdf</p>
5.3a Aluminium Smelting (management system)	Conformance	<p>The Entity has developed the necessary Management System in accordance with ISO 50001, operating procedures and operating controls to limit Direct GHG Emissions. The Low Carbon Aluminium is produced using renewable energy and Direct and Indirect emissions are calculated following GHG protocol covering emissions related to anode production, electricity production, and smelting (electrolysis) as per ASI guidance documents.</p>
5.3b Aluminium Smelting (up to and including 2020)	Conformance	<p>The Entity has developed the necessary Management System in accordance with ISO 50001, operating procedures and operating controls to limit Direct GHG Emissions. The GHG reduction plan until the year 2030 is disclosed in the TCFD report: https://www.vedantalimited.com/SiteAssets/Images/TCFD-FY2022.pdf</p>
5.3c Aluminium Smelting (after 2020)	Not Applicable	<p>This Criterion is not applicable as the Entity has no plans to commission new Aluminium Smelting facilities after 2020.</p>
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	<p>The Entity has developed a work instruction for the sampling and analysis of ambient air quality, The Entity has valid air emission permits. The terms and conditions are reviewed and implemented and data is transmitted directly to the State Pollution Control Board.</p> <p>Emission reports are submitted on monthly basis to Government authorities as per permit conditions</p>

CRITERION	RATING	COMMENT
		<p>and also uploaded at: https://vedantaaluminium.com/sustainability/compliance-report-jharsuguda/</p> <p>The parameters checked are as follows:</p> <ol style="list-style-type: none"> 1. Chimney and stacks of pot room fume treatment plant outlet 2. Fugitive fluoride 3. Ambient air quality at multiple locations <p>The Entity uses mechanised cleaning of internal roads and water spray to further mitigate air emissions.</p>
6.2 Discharges to Water	Conformance	<p>The Entity has been classified as a 'Zero Liquid Discharge-ZLD' facility. There is a Sewage Treatment Plant (STP) to treat domestic wastewater and an Effluent Treatment Plant (ETP) for process wastewater. The treated water quality parameters are checked monthly and reported to state pollution control board authorities.</p> <p>There are efforts to further reduce the wastewater generation and re-use of initially treated water in alternative applications such as toilets.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The spillage risk assessment is undertaken as part of the Environment Management System. The necessary training on spills/release risks, control measures, and waste management is provided to responsible employees including contract Workers and a review of the risk assessment is undertaken for any related incident. This aspect of spills and release is also covered under the corporate standard for waste management: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Waste-Management-Standard.pdf</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity has documented and implemented a procedure for spill management that details requirements for spillage risk assessment, response planning and internal reporting.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity reports any spillage in the internal IT based tool as well as significant spills to the management team and related authorities depending upon nature and volume/quantity.</p> <p>There has been no significant spillage occurring in the past year.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>The Entity has a practice of regular reporting and reviews of spillage in periodic HSE reviews as well as external reporting to concerned authorities, for</p>

CRITERION	RATING	COMMENT
		<p>example, the Environment statement, Form V to Ministry of Environment, Forest and Climate Change.</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/12/2400-MW-TPP-Env.-Statement-21-22.pdf</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has implemented a waste management standard, strategy and mitigation hierarchy as per Applicable Laws and corporate goals.</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Tailing-Management-standard-Jan17.pdf</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Waste-Management-Standard.pdf</p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>The Entity has in place an annual Hazardous Waste reporting process, in accordance with Hazardous and other waste (management and transboundary movement rules 2016 of Environment Protection Act 1986 (29 of 1986). The waste management disclosures are available at:</p> <p>https://vedantaaluminium.com/sustainability/compliance-report-jharsuguda/</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Tailing-Management-standard-Jan17.pdf</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Waste-Management-Standard.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.
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)	Conformance	The Entity has developed a procedure for pot lining material handling, which covers all pot lining

CRITERION	RATING	COMMENT
		material including Spent Pot Lining (SPL). The storage shed is covered and without any possibility of spillage/leakage of SPL in the open environment.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Conformance	The Entity is recovering and segregating carbon and refractory separately of SPL to optimise the recovery. The Workers/employees involved in SPL handling and recovery of carbon and refractory material separately, are trained and use personnel protective equipment (PPE) as required.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Conformance	There is no landfill disposal for Untreated Spent Pot Lining (Untreated SPL). The Entity disposes of Untreated SPL (refractory) to cement industries (e.g., to Dalmia Cement and others). For further information, refer to: https://newsriveting.com/vedanta-aluminium-inks-deal-with-dalmia-for-manufacturing-low-carbon-cement/
6.7d Spent Pot Lining (SPL) (review of alternatives)	Conformance	The Entity is constantly working to find alternative applications of SPL (refractory part) with various research institutes to find alternative applications to mix with fly ash and use in road construction.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Conformance	The Entity does not discharge SPL to marine or aquatic environments.
6.8a Dross (recovery)	Conformance	The Entity is working in order to maximise the recovery of Aluminium by treatment of Dross and Dross residues (Hot Dross and cold Dross) through operating a Dross recycling facility within the Special Economic Zone (SEZ) plant area.
6.8b Dross (recycling)	Conformance	The Entity is recovering Dross in two stages, hot and cold. There is documented procedure for hot Dross and cold Dross processing. The employees engaged in Dross recovery are trained and use all appropriate PPE. Data for Dross recovery for each Casthouse is recorded and maintained.
6.8c Dross (review of alternatives)	Conformance	The Entity is working in order to maximise the recovery of Aluminium by treatment of Dross and Dross residues (Hot Dross and cold Dross) by operating a Dross recycling facility within the SEZ plant area. The Entity is not disposing Dross residue to landfill, alternatively, it is used for briquette making.

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	<p>The Entity has prepared a water flow and balance diagram for both the smelter (SEZ) and the power plant which is updated quarterly.</p> <p>The source of water is from Hirakud Dam (in the Mahnadi basin). The water risk is considered high as per the World Resources Institute (WRI) Aqueduct Tool https://www.wri.org/applications/aqueduct/water-risk-atlas</p> <p>The water risk assessment and pipeline integrity report is available for the entire Jharsuguda aluminium business and is prepared by external agencies.</p>
7.1b Water assessment (risk assessment)	Conformance	<p>The water risk assessment and pipeline integrity report are available for the entire Jharsuguda aluminium business. An assessment of piping integrity was conducted by an external agency during April and May 2022.</p>
7.2a Water management (management plans)	Conformance	<p>The Entity has developed Water Management Standard which is available at: https://www.vedantaresources.com/SiteAssets/Images/VSFDocuments/Water%20management%20Standard.pdf A plant level water management plan has also been prepared and includes water metering, usages monitoring, and prevent water leakage as well as water saving projects.</p>
7.2b Water management (monitoring)	Conformance	<p>The water usage monitoring is undertaken on daily basis and is periodically reviewed.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity discloses water use and risk to Government authorities (CPCB/SPCB). The water consumption is also incorporated as part of a publicly available environment statement: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/12/2400-MW-TPP-Env.-Statement-21-22.pdf</p> <p>Water-related information like usage, recycling/reuse, and water conservation, is reported in the Sustainability Report, pages 67 and 119: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Vedanta-Aluminium-SDR-FY2022.pdf</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity has developed and implemented a Biodiversity Policy with a commitment to achieve No Net Loss: https://d1rbiogke1jwo5.cloudfront.net/wp-</p>

CRITERION	RATING	COMMENT
		<p>content/uploads/2022/11/Biodiversity-Policy-2022.pdf</p> <p>The other Biodiversity related documents and guidelines are available at: https://www.vedantaresources.com/Pages/VSFDocuments.aspx</p> <p>The Wildlife Conservation Plan in relation to the proposed expansion has been prepared by an external consultancy.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has developed a Biodiversity Management Plan based on the outcome of the biodiversity assessment. The biodiversity management plan was developed and acted upon.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has taken appropriate mitigation measures as per the Biodiversity Management Plan and progress is periodically tracked. Priority biodiversity actions have been completed whilst intermediate and long-term actions are in progress, and periodic monitoring is undertaken and reported. Periodic training of relevant personnel on environment management is undertaken and includes biodiversity aspects.
8.2c Biodiversity management (reporting)	Conformance	<p>The Entity has re-evaluated its Biodiversity impacts in alignment with its corporate commitment of 'No Net Loss'. The necessary public disclosures will be made in forthcoming sustainability reporting. In addition, reporting the Biodiversity Management Plan progress as initially agreed is periodically reported to authorities as well as through sustainability reporting.</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/12/Compliance-Report-18-LTPA-Smelter-1215-MW-CPP-Apr22-to-Sep22.pdf</p> <p>More information is available in the Sustainability Report, page 63: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Vedanta-Aluminium-SDR-FY2022.pdf</p>
8.3 Alien Species	Conformance	The risk assessment and control measures to address alien and invasive species have been implemented, and the fumigation of wooden pallets is ensured for incoming shipments.
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.

CRITERION	RATING	COMMENT
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.
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	<p>The Entity has developed a Human Rights Policy which includes a reference to the UN Guiding Principles on Business and Human Rights, UN Universal Declaration on Human Rights and other international instruments. The Code has been communicated to Stakeholders through display and periodic consultation with employees.</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Human-Rights-Policy-2022.pdf</p> <p>Additionally, a Social Policy has also been developed and implemented through various Human Resources, and Corporate Social Responsibility (CSR) policies and practices.</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Social-Policy-2022.pdf</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Human Rights Due Diligence approach is undertaken via a systematic approach, including a review of background information, company websites, identification of potential risks, existing mitigation measures, the responsibility of implementation, and residual risk. Some of the identified Human Rights risks relate to working hours, supply chain, Conflict-Affected and High-Risk Areas (CAHRAs). and social security benefits received by Contractors.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity has established various channels to report any grievances related to Human Rights or other similar matters. This is outlined in the Code of Business Conduct and Ethics</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Code-of-Business-Conduct-and-Ethics-Eng.pdf</p> <p>A complaint register room at the plant main gate with visible signage and a plant level Grievance Redressal Committee.</p>

CRITERION	RATING	COMMENT
9.2 Women's Rights	Conformance	<p>The Entity promotes women's and transgender employment. Women Workers also plan to work night shifts as allowed by recent changes to Indian law. The Entity has set targets for women to share 33% of the total workforce by 2026 and is working to achieve it. The Entity empowers women through different means such as training to become Forklift/heavy vehicle drivers, CSR projects, and establishing a women's council within the Entity which meets periodically besides statutory provisions to set up an internal complaints committee (ICC).</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Anti-Harassment-Policy_vF.pdf</p>
9.3 Indigenous Peoples	Conformance	<p>There are no Indigenous People as per a background assessment (https://www.iwgia.org/en/resources/indigenous-world.html) as well as discussion with management and visits to the community. There are Schedule Tribes (ST) which are legally classified as a special social group and have the privilege/special protection of their social rights. The Entity does not discriminate on the basis of caste, social group, or religion as confirmed during the review of employees' interviews, review of interview panel formation, or employment documentation. The Entity has developed and implemented an Indigenous Peoples/Vulnerable Tribal Group (IP/VTG) Policy available at: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Indigenous-Peoples-Vulnerable-Tribal-Group-Policy-2022.pdf</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	<p>There are no Indigenous People whose land was used in setting up the facility, and thus FPIC is not applicable to the Entity. However, during this phase, resettlement did occur with displaced families' approval obtained as per statutory proceedings mediated by government authorities.</p>
9.5 Cultural and sacred heritage	Conformance	<p>The Entity has developed and implemented a technical standard 'Cultural Heritage': https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Cultural-Heritage.pdf</p> <p>There are no cultural and sacred heritage sites within ten kilometres of the Entity.</p>
9.6a Resettlements (avoid or minimise)	Conformance	<p>The Entity has developed and implemented a technical standard on Land and Resettlement</p>

CRITERION	RATING	COMMENT
		<p>Management: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Land-and-Resettlement-Management.pdf</p> <p>During the construction phase (in 2006), resettlement did occur with displaced families' approval obtained as per statutory proceedings mediated by government authorities. Residential accommodation was provided to displaced families as per the provision of statutory provisions/agreements. There are no pending actions under Resettlement and Rehabilitation (R&R), Rehabilitation and Periphery Development Advisory Committee (RDPC) and monthly progress reports.</p> <p>There has been no resettlement since becoming an ASI Member. There are no ongoing disputes/claims regarding the historical re-settlement activity.</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>The Entity has developed and implemented a technical standard on Land and Resettlement Management: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Land-and-Resettlement-Management.pdf</p> <p>There has been no resettlement since becoming an ASI Member. There are no ongoing disputes/claims regarding the historical re-settlement activity.</p>
9.7a Local Communities (rights and interests)	Conformance	<p>The Entity has developed a Technical Standard Stakeholder Engagement: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Stakeholder-Engagement.pdf and respects the rights of Local Communities. In addition, it has developed a technical standard on social investment management involving Local Communities https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Social-Investment-Management.pdf</p>
9.7b Local Communities (impacts)	Conformance	<p>The Entity has assessed its business activity impacts on the Local Community and taken appropriate measures to mitigate any negative impact and work towards well-being, education, livelihood and women's empowerment. https://vedantaaluminium.com/sustainability/social-impact/</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity's CSR projects are conceptualised based on thematic areas found during visits to</p>

CRITERION	RATING	COMMENT
		<p>Local Communities and consultations. The details of social impact are publicly available at: https://vedantaaluminium.com/sustainability/social-impact/</p> <p>The historical fly ash issue with the Katikela village has been resolved and necessary fly ash tailing management actions and practices have been implemented effectively.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity has established various policies and screening to avoid the contribution to Conflict-Affected and High-Risk Areas (CAHRAs). See Supply chain screening in the Sustainability Report, page 34: https://vedantaaluminium.com/wp-content/uploads/2022/11/Vedanta-Aluminium-SDR-FY2022.pdf</p> <p>The Entity has undertaken a screening of its major suppliers of raw materials, and consumables including its own Alumina refinery at Kalahandi, Odisha using available international tools. There are no existing suppliers operating out of CAHRAs.</p>
9.9 Security practice	Conformance	<p>The security Management System is available, documented and publicly available at: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Security-Management.pdf</p> <p>Security provisions include traffic control, ID card checks, CCTV surveillance security, watch tower, patrolling, access control, vigilance, and security guards. The security communication systems are designed and implemented and monitored by a real-time control room.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The Entity's' Human Rights Policy addresses Freedom of Association and rights to Collective Bargaining. https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Human-Rights-Policy-2022.pdf</p> <p>There is also a technical standard for employee consultation and participation. https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Employee-Consultation-Participation.pdf</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The employees' rights to have the freedom to form an association and the right to Collective Bargaining are covered and communicated through displays at the workplace, training, policies and</p>

CRITERION	RATING	COMMENT
		<p>guidelines. The Entity has developed a technical standard for employee consultation and participation.</p> <p>https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2021/03/Employee-Consultation-Participation.pdf</p>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Criterion is not applicable since Freedom of Association and the Right to Collective Bargaining in India are regulated by law.
10.2a Child Labour (minimum age)	Conformance	Age verification is part of the hiring process and is recorded as part of employment records. The actual minimum age employed is above 18 years as per the employees' master list. It is also part of the Entity's modern slavery commitment which is further communicated to its supply chain as well. The Entity collects annual declarations confirming compliance with stated requirements such as no Child Labour, no Forced Labour, compliance with the law, minimum wage, equal treatment and no Human Trafficking.
10.2b Child Labour (hazardous)	Conformance	The Entity does not engage in, nor support Hazardous Child Labour as found through work allocation review and plant visit.
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage in, nor support Hazardous Child Labour as found through work allocation review and plant visit.
10.3a Forced Labour (human trafficking)	Conformance	There is no practice of keeping original documents, financial security or other means of Forced Labour as confirmed during worker interviews. It is also part of the Entity's modern slavery commitment which is further communicated to actors within its supply chain and where annual declarations confirming the compliance with stated requirements are collected covering no Child Labour, no Forced Labour, compliance with the law, minimum wage, equal treatment and no Human Trafficking.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not require any form of deposit, recruitment fee or equipment advance from Workers/employees either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers/employees to lodge deposits or security

CRITERION	RATING	COMMENT
		payments at any time during the employment period.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not have any practice to hold Workers/employees 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 does not have any practice to unreasonably restrict the freedom of movement of Workers in the workplace or on-site housing.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not have any practices to retain any original copies of Workers/employees' identity papers, work permits or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny employees the freedom to terminate their employment at any time without penalty, given notice as per mutually agreed employment contract.
10.4 Non-Discrimination	Conformance	There is no Discrimination in the hiring, training and promotion e.g., Hiring: interview by more than one person, as per the Entity's Recruitment Policy. The training needs are identified and imparted as per the competency matrix.
10.5 Communication and engagement	Conformance	<p>The Entity does follow comprehensive employee engagement activities and has received several rewards and recognition for being a leading employer in India.</p> <p>The Entity has a detailed employee engagement plan, covering thematic areas such as communication, branding, rewards & recognition and quality of life and initiatives like Proud Parents, Coffee with Human Resources, sports, employee awards, and internal dipstick surveys among different thematic areas.</p> <p>A 'town hall' meeting occurs each quarter and a printed quarterly newsletter called 'Samanway' is a significant communication platform.</p>
10.6 Disciplinary practices	Conformance	The Entity has written rules of 'disciplinary measures" detailed in both the employee Code of Conduct, and employee handbook. These are based on statutory approvals called 'Certified Standing Orders' available in English, Hindi and Odia, they are displayed on notice boards in work areas.
10.7a Remuneration (living wage)	Conformance	The Entity has recently undertaken a living wage survey of full-time employees as well as contractual

CRITERION	RATING	COMMENT
		employees. All the employees are receiving at least 10% more than the minimum wage.
10.7b Remuneration (method of payment)	Conformance	<p>The minimum wage is mandated by the State Government: https://labour.odisha.gov.in/sites/default/files/2022-11/6078.pdf</p> <p>The Entity's actual minimum wage paid is higher than the minimum wage. The salary is paid on monthly basis through bank transfer.</p>
10.8 Working Time	Conformance	<p>Working hours are recorded through a biometric attendance system. The shift schedule is on a rolling basis and employees are provided with mandated rest days and leaves.</p> <p>The Entity monitors both working hours and Overtime using a 'gate pass' system which prevents any employees to work continuously on the seventh day after six continuous days of work. The Entity's CEO office and Human Resources Department prepare and review monthly working hours and Overtime situations.</p> <p>There are statutory reporting requirements for working hours, Overtime and wages.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has developed and implemented an Occupational Health and Safety Policy (OH&S), available at: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Vedanta-HSE-Policy-2022.pdf</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity has developed and implemented an OH&S Policy, available at: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2022/11/Vedanta-HSE-Policy-2022.pdf</p> <p>The OH&S Policy applies to all Workers and Visitors within plant premises and areas of control.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>The OH&S policy commits to comply with applicable national, regional, and local HSE regulations and statutory obligations,</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The OH&S Policy and related procedures reflect the company's commitment towards Workers' rights to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.</p>

CRITERION	RATING	COMMENT
11.2 OH&S Management System	Conformance	The OH&S Management System is certified as per ISO 45001:2018 and comprises of procedures, safety standards and guidelines. Many of these are publicly available at: https://vedantaaluminium.com/sustainability/sustainability-policies-standards-guidance-notes/sustainability-standards/
11.3 Employee engagement on health and safety	Conformance	The Entity has a concept known as 'Suraksha Samvad', which equates to safety communication by the leadership team who visits each part of the facility each month. This also assists in understanding 'shop floor' issues, directly focussed interaction with Workers, and contract employees. There is good practice to develop OH&S training modules with department owners to encourage "ownership".
11.4 OH&S performance	Conformance	The Entity has established various lagging and leading OH&S performance indicators, for both the SEZ smelter and power plant. The corrective action and necessary investigations have been undertaken and recommendations implemented.

Document Control and Version History

Revision	Date	Notes
0	14 April 2023	Initial Certification Audit - Full Certification