

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

Vedanta Limited

Aluminium Business

(SEZ Smelter – JHARSUGUDA)

CERTIFICATE NUMBER

363

ASI STANDARD

CHAIN OF CUSTODY
(V2 2022)

DATE OF ISSUE

7 MARCH 2024

CERTIFICATION LEVEL

FULL
CERTIFICATION

DATE OF EXPIRY

6 MARCH 2027

ASI ACCREDITED
AUDITING FIRM

CETIZION VERIFICA

CERTIFIED SINCE

7 MARCH 2024

AUTHORISED BY

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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 products in the form of billets, wire rods, 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 (Restora & Restora Ultra).

AUDIT REPORT

CHAIN OF CUSTODY

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 products in the form of billets, wire rods, 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 (Restora & Restora Ultra).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthouses
ASI STANDARD	<ul style="list-style-type: none">Chain of Custody Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none">26 – 27 October 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">7 February 2024
AUDIT SCOPE	<p>The audit scope includes the manufacture and supply of all primary Aluminium products in the form of billets, wire rods, primary foundry alloys (PFA), ingot and sow from Vedanta Aluminium Smelter located within the Special Economic Zone (SEZ) at Jharsuguda, Odisha, India. Including low-carbon primary Aluminium (Restora and Restora Ultra). Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthouses <p>All relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.</p>
AUDIT OUTCOME	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.

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- ☑ 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 7 March 2024 – 6 March 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 7 September 2025

CERTIFICATE NUMBER 363



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

The Vedanta Limited (Aluminium Business) comprises of four facilities: Alumina Refinery at Lanjigarh (Odisha, India), Aluminium Smelter (SEZ) at Jharsuguda (Odisha, India), Aluminium Smelter (DTA) at Jharsuguda (Odisha, India), Aluminium Smelter Balco, Korba (Chhattisgarh, India).

The Vedanta Limited Smelter and Casthouse is one of the world's largest single-location Aluminium plant. It is located within a special economic zone (SEZ), in the Jharsuguda district of Orisa State of India. Associated utilities and infrastructure such as road, rail, and airway connections are available in all the locations. Vedanta Limited (Aluminium Business) follows the same policies and sustainability standards as laid down by our holding company Vedanta Resources Ltd.

The Jharsuguda plant has a 1.8 MTPA Aluminium smelting capacity and an associated 3615 MW thermal power generation facility. It is the only Indian smelter in the global '1 million tonne' production and export, and a leader in value-added Aluminium products that find critical applications across a diverse array of industries.

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

OVERALL	
SYSTEMS	Medium
RISKS	Medium
PERFORMANCE	Medium
OVERALL	MEDIUM

FINDINGS

CRITERION	RATING	COMMENT
1. MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI Membership	Conformance	The Entity has a valid ASI membership at the time of the Audit.
1.2 CoC Management System	Conformance	The Entity has developed and implemented a Management System which includes procedures, responsibilities, training and resources which fulfils ASI Chain of Custody V2.0 requirements.
1.3 CoC Management System Monitoring	Conformance	The Entity has implemented a system of internal monitoring through an internal audit process.
1.4 Management Representative	Conformance	The Entity has designated a member of the senior management team as the management representative with overall responsibility and authority for conformance with the requirements of the ASI Chain of Custody Standard.
1.5 Communications and Training	Conformance	The Entity has internally communicated the ASI Chain of Custody V2.0 requirements to employees through email, focussed group training, and displays.
1.6 Records Management	Conformance	The Entity has defined a retention period of five years for records.
1.7a Reporting to ASI (Inputs and Outputs of CoC Material)	Conformance	The Entity has included the reporting requirements in a Standard Operating Procedure (SOP) which states that the Entity must report data to the ASI Secretariat, via the appropriate reporting form, by 30 June of the year following the end of each calendar year: Input and Output Quantities of CoC Material/s to/from the Certified Entity over the calendar year.
1.7b Reporting to ASI (Inputs and Outputs of Eligible Scrap)	Conformance	The Entity has included the reporting requirements in its SOP which states that the Entity must report data to the ASI Secretariat, via the appropriate reporting form, by 30 June of the year following the end of each calendar year: Input and Output Quantities of Eligible Scrap to/from the Certified Entity over the calendar year.
1.7c Reporting to ASI (Inflows and Outflows of Non-CoC Material)	Conformance	The Entity has included the reporting requirements in its SOP which states that the Entity must report data to the ASI Secretariat, via the appropriate reporting form, by 30 June of the year following the end of each calendar year: Inflow and Outflow Quantities of Non-CoC Material/s to/from the Certified Entity over the calendar year.
1.7d Reporting to ASI (Positive Balance carried over)	Conformance	The Entity has included the reporting requirements in its SOP which states that the Entity must report data to the ASI Secretariat, via the appropriate reporting form, by 30 June of the year following the end of each calendar year: Positive Balance carried over to the subsequent Material Accounting Period, if applicable.
1.7e Reporting to ASI (Positive Balance used)	Conformance	The Entity has included the reporting requirements in its SOP which states that the Entity must report data to the ASI Secretariat, via the

CRITERION	RATING	COMMENT
		appropriate reporting form, by 30 June of the year following the end of each calendar year: Positive Balance used, if applicable.
1.7f Reporting to ASI (Internal Overdraw drawn down)	Conformance	The Entity has included the reporting requirements in its SOP which states that the Entity must report data to the ASI Secretariat, via the appropriate reporting form, by 30 June of the year following the end of each calendar year: Internal Overdraw drawn down from the subsequent Material Accounting Period, if applicable.
1.7g Reporting to ASI (Intra-Entity Flows)	Conformance	The Entity has included the reporting requirements in its SOP which states that the Entity must report data to the ASI Secretariat, via the appropriate reporting form, by 30 June of the year following the end of each calendar year: Quantities of CoC Material/s transferred between supply chain activities within the CoC Certified Entity (Intra-Entity Flows) over the calendar year.
2. OUTSOURCING CONTRACTORS		
2.1 Certification Scope	Not Applicable	There are no Outsourcing Contractors that take Custody of CoC Material for the purposes of further processing, treatment, or manufacturing.
2.2a Control of CoC Material (Legal ownership or control)	Not Applicable	There are no Outsourcing Contractors that take Custody of CoC Material for the purposes of further processing, treatment, or manufacturing.
2.2b Control of CoC Material (No further outsourcing)	Not Applicable	There are no Outsourcing Contractors that take Custody of CoC Material for the purposes of further processing, treatment, or manufacturing.
2.2c Control of CoC Material (Risk assessment)	Not Applicable	There are no Outsourcing Contractors that take Custody of CoC Material for the purposes of further processing, treatment, or manufacturing.
2.3 Information on Quantity of CoC Material Output and Returned	Not Applicable	There are no Outsourcing Contractors that take Custody of CoC Material for the purposes of further processing, treatment, or manufacturing.
2.4 Consistency in Inflow and Outflow Quantity of CoC Material to/from Outsourcing Contractor	Not Applicable	There are no Outsourcing Contractors that take Custody of CoC Material for the purposes of further processing, treatment, or manufacturing.
2.5 Error (Outsourcing Contractor)	Not Applicable	There are no Outsourcing Contractors that take Custody of CoC Material for the purposes of further processing, treatment, or manufacturing.
3. PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI ALUMINIUM		
3.1a ASI Bauxite (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.1b ASI Bauxite (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.1c ASI Bauxite (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2a ASI Alumina (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2b ASI Alumina (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.2c ASI Alumina (Bauxite sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.3a ASI Aluminium (CoC Certification Scope)	Conformance	ASI Aluminium is produced only from Aluminium Smelters (SEZ), which are within the Entity's CoC Certification Scope and under direct management control.
3.3b ASI Aluminium (Performance Standard)	Conformance	The Entity is certified to ASI Performance Standard: https://aluminium-stewardship.org/wp-content/uploads/2023/04/ASI-Summary-Audit-Report-Vedanta-Limited-Certificate-Number-279-PS.pdf
3.3c ASI Aluminium (Alumina sourcing)	Conformance	The Entity has developed a system to ensure that sourcing ASI Alumina from an ASI CoC Certified Entity, directly and/or through a Trader where the ASI CoC Certified Entity that is the source of the ASI Alumina can be identified and can provide a verified CoC Document.
4. RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP		
4.1a Recycled Aluminium (CoC Certification Scope)	Conformance	The Entity has a valid ASI membership at the time of audit. There is no external Entity involved in providing ASI Aluminium.
4.1b Recycled Aluminium (Performance Standard)	Conformance	The Entity has a valid ASI Performance Standard Certification, (Number 279), issue date 14 April 2023.
4.2a Eligible Scrap (Pre-Consumer)	Conformance	The Entity only consumes its own Pre-Consumer Scrap eligible scrap) and addressed it in the material accounting system.
4.2b Eligible Scrap (Post-Consumer)	Conformance	The Entity has defined Post-Consumer Scrap supplier (origin) Due Diligence requirements. Currently, there is no Post-Consumer Scrap procured from suppliers.
4.2c Eligible Scrap (Dross)	Conformance	The Entity has accounted the Aluminium recovered from Dross as an Eligible Scrap in the material accounting system.
4.3a Records Management for Direct Suppliers of Recyclable Scrap Material (Suppliers)	Conformance	The Entity has defined and implemented a records Management System with a five year retention period.

CRITERION	RATING	COMMENT
4.3b Records Management for Direct Suppliers of Recyclable Scrap Material (Financial transactions)	Conformance	The Entity has defined and implemented a records Management System with a five year retention period.
5. CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
5.1a ASI Aluminium (CoC Certification Scope)	Conformance	The Entity's Casthouse operations to produce ASI Aluminium is part of the ASI CoC Certification Scope.
5.1b ASI Aluminium (Performance Standard)	Conformance	The Entity's Casthouse is under the ASI CoC Certification Scope, which is Certified as per ASI Performance Standard, certificate number 279, issued on 14.04.2023.
5.1c ASI Aluminium (Aluminium sourcing)	Conformance	The Entity's Casthouses Input material is sourced from an inhouse smelter and under ASI CoC Certification Scope.
5.2 Unique Identification	Minor Non-Conformance	The Entity has created separate material codes for ASI CoC Material. However, there is no provision for the periodic inspection of identification numbers stamped on, or associated with ASI Aluminium.
6. POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a Post-Casthouse ASI Aluminium (CoC Certification Scope)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1b Post-Casthouse ASI Aluminium (Performance Standard)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.1c Post-Casthouse ASI Aluminium (Aluminium sourcing)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. DUE DILIGENCE FOR NON-COC MATERIAL, COC MATERIAL ACQUIRED THROUGH A TRADER AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible Sourcing Policy (Anti-corruption)	Conformance	The Entity's parent company has developed a Supplier Code of Conduct, which addresses "Anti-Corruption" and communicates to all suppliers. https://www.vedantaresources.com/InvestorRelationDoc/Supplier%20Code%20of%20Conduct_May%202022.pdf
7.1b Responsible Sourcing Policy (Responsible sourcing)	Conformance	The Entity's parent company has developed a Supplier Code of Conduct to communicate to all suppliers. https://www.vedantaresources.com/InvestorRelationDoc/Supplier%20Code%20of%20Conduct_May%202022.pdf
7.1c Responsible Sourcing Policy (Human rights due diligence)	Conformance	The Entity's parent company (Vedanta Resources) has developed a Supplier Code of Conduct, which addresses Human Rights and Due Diligence to communicate to all its suppliers. https://www.vedantaresources.com/InvestorRelationDoc/Supplier%20Code%20of%20Conduct_May%202022.pdf

CRITERION	RATING	COMMENT
		In addition, there is a Human Rights Policy as a standalone Policy and grievance-handling mechanism for external stakeholders, including Affected Populations, to raise any concerns on Human Rights. The Entity has also developed a Modern Slavery statement covering Human Rights. https://dlrbiogkeijwo5.cloudfront.net/wp-content/uploads/2022/11/Human-Rights-Policy-2022.pdf
7.1d Responsible Sourcing Policy (Conflict-affected and high-risk areas)	Minor Non-Conformance	The Entity's Supplier Code of Conduct (Responsible Sourcing Policy) does not make reference to Conflict-Affected and High-Risk Areas and/or the OECD Due Diligence Guidance framework https://www.vedantaresources.com/InvestorRelationDoc/Supplier%20Code%20of%20Conduct_May%202022.pdf
7.2 Risk Assessment and Mitigation	Minor Non-Conformance	The Entity does not formally assess the risks of Non-Compliance with its Responsible Sourcing Policy, including the risk relating to mitigation efforts, supplier audits, and the training of buyers. Only partial risk assessments were conducted in regard to Modern Slavery and the potential existence of CAHRA.
7.3 Complaints Resolution Mechanism	Conformance	The Entity has a documented complaints resolution mechanism within its existing quality Management System.
8. MASS BALANCE SYSTEM: CoC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	The Entity has defined a Material Accounting System as part of its ASI CoC Procedure.
8.2 Material Accounting Period	Conformance	The Entity has defined a Material Accounting Period of 12 months as part of its ASI CoC Procedure.
8.3 Input and Inflow Quantities	Conformance	The Entity has defined that the Inflow Quantity of Eligible Scrap and Recyclable Scrap Materials are based on an assessment of Aluminium content.
8.4 Output Quantities of CoC Material	Conformance	The Entity, as per its procedure, uses the Input Quantities for each CoC Material to determine the available Quantities of CoC Material for Output, proportional to total Inflows of CoC and Non-CoC Materials by mass.
8.5 Indivisibility of CoC Material	Conformance	The Entity defined Output Quantity of CoC Material, as a subset of total production, will be designated as 100% CoC Material.
8.6 Output Quantity of Eligible Scrap	Conformance	The Entity, as per its procedure, uses the percentage share of generated Scrap as Eligible Scrap over a given Material Accounting Period, similar to its Output of ASI Aluminium.
8.7 Consistency Between Input Percentage and Total Output	Conformance	The Entity's Material Accounting System confirms that the total Output of CoC Material and/or Eligible Scrap does not proportionally exceed the Input Percentage of CoC Material and/or Eligible Scrap over the Material Accounting Period.

CRITERION	RATING	COMMENT
8.8a Internal Overdraw (Not exceed 20%)	Conformance	Under the situation of Force Majeure, the Entity's Internal Overdraw does not exceed 20% of the total Input Quantity of CoC Material for the Material Accounting Period.
8.8b Internal Overdraw (Not exceed force majeure situation)	Conformance	The Entity's Internal Overdraw does not exceed the amount of CoC Material affected by the Force Majeure situation.
8.8c Internal Overdraw (Made up within subsequent Material Accounting Period)	Conformance	The Entity's Procedure states that Internal Overdraw will be made up within the subsequent Material Accounting Period whenever withdrawn under a Force Majeure situation.
8.9a Positive Balance (Carry over)	Conformance	The Entity's Procedure states that, in the case of any carry-over of Positive Balance to the subsequent Material Accounting System, it will be identified.
8.9b Positive Balance (Expiry)	Conformance	The Entity's Procedure states that any Positive Balance generated in one Material Accounting Period and carried over to the subsequent material accounting period will expire at the end of that period, if not drawn down.

9. ISSUING COC DOCUMENTS

9.1 CoC Document	Conformance	The Entity's Procedure requires that a CoC Document accompanies each shipment or transfer of CoC Material dispatched to other CoC Certified Entities or Traders.
9.2a CoC Document Content (Date of issue)	Conformance	The Entity issues CoC Documents that include its issue date.
9.2b CoC Document Content (Reference number)	Conformance	The Entity's CoC Documents issued include the reference number internally linked with its Material Accounting System.
9.2c CoC Document Content (Issuing Entity)	Conformance	The Entity's CoC Documents issued include the Entity's identity, address, and CoC Certification number.
9.2d CoC Document Content (Receiving customer)	Conformance	The Entity's CoC Documents issued include the receiving Entity (customer) identity, address, and CoC Certification Number (if available).
9.2e CoC Document Content (Responsible employee)	Conformance	The Entity's CoC Documents issued include the name of the responsible employee who can verify information in the CoC Document.
9.2f CoC Document Content (Conformance statement)	Conformance	The Entity's CoC Documents issued include a statement that states, "The information provided in the CoC Document is in Conformance with the ASI CoC Standard."
9.2g CoC Document Content (Type of CoC Material)	Conformance	The Entity CoC Documents issued include the type of CoC Material in the shipment.

CRITERION	RATING	COMMENT
9.2h CoC Document Content (Mass of CoC Material)	Conformance	The Entity CoC Documents issued include the mass of CoC material in the shipment.
9.2i CoC Document Content (Mass of total material)	Conformance	The Entity's CoC Documents issued include the mass of total Material in the shipment.
9.3a Sustainability Data (optional) - Carbon footprint	Conformance	The Entity's CoC Documents issued includes a provision to provide sustainability data related to the carbon Footprint of the product (optional).
9.3b Sustainability Data (optional) - Origin information	Minor Non-Conformance	The Entity's CoC Documents issued do not include the provision to provide Sustainability Data related information relating to the origin of Aluminium.
9.3c Sustainability Data (optional) - Recycled content	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.3d Sustainability Data (optional) - Post-Casthouse ASI Certification status	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4 Supplementary Information (optional) - Objective evidence	Conformance	The Entity's CoC Documents issued include a provision to mention Supplementary Information supported by objective evidence.
9.5 Verification of Information	Conformance	The Entity has systems in place to respond to reasonable requests for verification of information in CoC Documents issued.
9.6 Error (Shipping)	Conformance	The Entity has systems in place to document errors as well as the agreed steps taken with the receiving party to correct them, and to implement Corrective Actions to avoid a recurrence.

10. RECEIVING COC DOCUMENTS

10.1 Verification of CoC Documents	Conformance	The Entity's has established a Procedure that requires the verification of all information referenced in the received CoC Documents.
10.2 Verification of Consistency Between CoC Documents and CoC Material	Conformance	The Entity has established a Procedure that requires the verification of the consistency of received CoC Documents with the accompanying CoC Material or Eligible Scrap before recording information in their Material Accounting System.
10.3 Verification of Supplier's ASI CoC Certification	Conformance	The Entity has established a Procedure that requires the periodic checking of the ASI website to verify the validity and scope of the Entity's upstream supplier's ASI CoC Certification for any changes that might affect the status of the supplied CoC Material or Eligible Scrap.
10.4 Error (Reception)	Conformance	The Entity's has established a Procedure of Non-Conforming Products and Corrective Action that requires the documentation of any error,

CRITERION	RATING	COMMENT
		which is then followed by a root cause analysis with corrective actions developed with the supplying party to avoid a recurrence.
11. CLAIMS AND COMMUNICATIONS		
11.1a Claims and Communications (ASI Claims Guide)	Conformance	The Entity has established a system to ensure that any claims and/or representations about CoC Material outside of CoC Documents are made in a consistent manner with the ASI Claims Guide.
11.1b Claims and Communications (Verifiable evidence)	Conformance	The Entity has established a system to ensure that any claims and/or representations about CoC Material outside of CoC Documents, are supported by verifiable evidence about the claims and/or representations made.
11.1c Claims and Communications (Employee training)	Conformance	The Entity has established a system to ensure that appropriate training is provided for responsible employees to properly understand and communicate claims and/or representations in regard to CoC Material outside of CoC Documents.

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	7 March 2024	Initial Certification Audit – Full Certification