
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

CETIZION VERIFICA

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.

Aluminium Stewardship Initiative Ltd
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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 (8 – 13 September 2022)Surveillance Audit (22 – 25 July 2024)
AUDIT FIRM	Cetizion Verifica
AUDIT DATE	<ul style="list-style-type: none">8 – 13 September 2022 (Initial Certification Audit)22 – 25 July 2024 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">12 December 2021 (Initial Certification Audit)11 March 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (8 – 13 September 2022)</u></p> <p>The Audit Scope covers the manufacturing and supply of Unalloyed and Alloyed Aluminium 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> <p><u>Surveillance Audit (22 – 25 July 2024)</u></p> <p>The Audit Scope covers the manufacturing and supply of Unalloyed and Alloyed Aluminium flat rolled products (plate coils & sheets) at Hindalco Industries Ltd (Hirakud FRP).</p> <p>Supply chain activities included in the audit scope:</p>

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- Material Conversion (Production and Transformation)

All relevant criteria in the ASI Performance Standard are 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

22 December 2022 – 21 December 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DATE

21 December 2025

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. The updates in legal requirements have been identified.
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 through various means such as the notice board, periodic training, and the website. https://www.hindalco.com/investor-centre/policies

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	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
2.3a Environmental and Social Management Systems (environmental)	Conformance	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
2.3b Environmental and Social Management Systems (social)	Conformance	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
2.4 Responsible Sourcing	Conformance	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 Entity has provided training on the Supplier Code of Conduct to buyer team members and has commenced monitoring of its supply chain to check conformance with responsible sourcing 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.

CRITERION	RATING	COMMENT
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 in the Integrated Annual Report: 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
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 that is available to internal and external Stakeholders: https://www.hindalco.com/upload/pdf/hindalco-whistle-blower-policy-19.pdf There is a procedure for capturing, handling and responding to Stakeholder grievances and stakeholder feedback is recorded in a register through either a meeting with the responsible employee(s) and/or reporting at the main gate.

CRITERION	RATING	COMMENT
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 a Casthouse (A Group entity not in the Certification Scope) in the HiraKud cluster which is used as Secondary Aluminium/recycled content in new slab casting and sent back to the Entity. There 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 rates. 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	There is a corporate level strategy to increase the collection and recycling rates 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 At the corporate level, there are efforts at a regional and national level to increase the recycling rates

CRITERION	RATING	COMMENT
		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.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity has determined Scope 1 and Scope 2 Greenhouse Gases (GHG) and energy consumption by source. The Entity at corporate level has commitment to achieve net zero by 2050. The Entity has a digital Energy Management System (EMS) to track energy usages at various sources. Disclosure of GHG emissions data is made available in the Group's Integrated Annual Report on page 136: https://www.hindalco.com/integrated-annual-report2022-23/pdf/Hindalco-Integrated-Annual-Report-2022-23.pdf The Entity level inputs are amalgamated in Group wide data.
5.2 GHG emissions reductions	Conformance	The Entity has identified energy saving projects which are contributing to a reduction in GHG emissions which are disclosed in the Group Integrated Annual Report, page 136: https://www.hindalco.com/integrated-annual-report2022-23/pdf/Hindalco-Integrated-Annual-Report-2022-23.pdf There is a Group-wide target to reduce emissions intensity by 25% by FY 2024-25 from the baseline year 2011-12.
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	Periodic testing of ambient and point-source emissions is undertaken monthly by an external accredited agency, and air emissions are currently within permissible limits.
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

CRITERION	RATING	COMMENT
		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)	Conformance	The Entity has established a management plan and associated practices to contain and prevent Spills and Leakage. The Entity has commenced a 'Layered Process Audit' (LPA) process to ensure chemical safety and prevent any spillage. The LPA is a monthly inspection activity and the workflow is managed through the Entity's ERP. During plant visit, there were no Spills or Leakages identified.
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. The Entity in conjunction with Corporate, has established a strategy to achieve zero waste to landfill by 2050. The Entity recently underwent a third party audit for its zero waste to landfill claims.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity's Waste management reporting is Group-wide and available in the Hindalco Integrated Annual Report, page 149: https://www.hindalco.com/upload/pdf/hindalco-annual-report-2022-23.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.

CRITERION	RATING	COMMENT
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.
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.

CRITERION	RATING	COMMENT
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: 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 Entity completed an updated and detailed Biodiversity assessment during June 2023 (summer season, earlier winter season study was conducted in year 2022) that included invasive species, and details baseline flora and fauna biodiversity in a 'core' zone and 'buffer' zone.
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 Management Plan has been developed as an outcome of the Biodiversity assessment (section 4.7 of the latest biodiversity report).
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.

CRITERION	RATING	COMMENT
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.
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 implemented an updated Human Rights Policy, which is available at: https://www.hindalco.com/upload/pdf/human-right-policy.pdf</p> <p>The Declaration of Human Rights has been communicated in three languages (English, Hindi, Odisha) to employees and suppliers. Training is provided to suppliers and contractors working on site through standard training materials and records are maintained.</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has developed corporate wide Human Rights Due Diligence assessment tools, customised to the Entity’s conditions. It incorporates 30 types of Human Rights and their potential abuses, and guidance in the context of employees, suppliers and contractors. A dashboard has been developed as an outcome of assessment and a Human Rights Management Plan has been developed.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity has developed a Human Rights Management Plan based on its Human Rights Due Diligence outcome and Stakeholder engagement framework.</p>
9.2 Women’s Rights	Conformance	<p>The Entity is focussing on advancing women rights through hiring preference, training and career development. The current number of women has increased by 7% since 2022. Female employees also start working in night shift with due permission from the Government authority and associated activities including escorting them in night travel.</p> <p>Female employees including security guards from contractor were interviewed and found positive feedback on Entity work culture and motivating environment.</p>

CRITERION	RATING	COMMENT
		The country-specific frameworks such as Prevention of Sexual Harassment (POSH) are implemented through awareness, training, grievance reporting, management review and reporting to authorities.
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.
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 Entity has demonstrated its ongoing CSR projects since the last ASI Audit. The Entity has conducted a formal baseline assessment from the Asian Institute of Sustainable Development (AISD), Ranchi in early 2023, which identified needs around the development of education infrastructure which is realized by the Non-Government Organisation (NGO) HELP (Health, Environment & Literacy of People), based in Koraput, Odisha, with a total of 16 Anganwadi centres (AWC). The Entity's KPIs are established to monitor effectiveness of CSR projects aimed at community engagement and impacts such as budget utilisation and number of beneficiaries.
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

CRITERION	RATING	COMMENT
		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
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 Hirakud FRP Works Employees Union' whose members were elected through secret ballot in the presence of a Government labour officer. The Long Term Settlement (LTS) of March 2022 remains valid and discussion for the next LTS are in progress as per discussion with management and Trade Union office bearers.
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

CRITERION	RATING	COMMENT
		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 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

CRITERION	RATING	COMMENT
		of Forced Labour and does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length as stated in the employment agreement.
10.4 Non-Discrimination	Conformance	The Entity has 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	<p>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 2023-24 and a corporate manual for employee engagement and communication (e.g., quarterly town hall meetings, and skip-level meetings).</p> <p>The biennial employee satisfaction survey (called Vibes) was conducted in 2023 through Corporate, with results indicating the overall engagement index increased by 7 points from 2021. A detailed SWOT was conducted and necessary improvement measures are underway including extending the education program to cover both supervisors and Workers. The business-wide 'Great Place to Work Certification'™ was renewed within Hindalco, refer to: https://www.greatplacetowork.in/great/company/hindalco-industries-ltd</p>
10.6 Disciplinary practices	Conformance	The Entity adheres to statutory disciplinary practices, and the model standing orders are displayed in the work area. The Entity has established a Standard Operating Procedure (SOP) for taking disciplinary actions related to, for example, 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

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		premium rate along with the salary. Detailed wage slips are issued as a paper copy.
10.8 Working Time	Minor Non-Conformance	The Entity has complied with applicable national laws and the Collective Bargaining agreement covering Working Time. Working hours are recorded through biometric machines. However, during Worker interviews and a review of related records it was found that the details for leave records for annual and/or privileged leave are not maintained as per statutory requirements.
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. The Entity has completed a qualitative exposure assessment by an internal qualified certified industrial hygienist at Group level.

CRITERION	RATING	COMMENT
		Recent new safety-related initiatives implemented at the Entity include: 1. Qualitative assessment of workplace for heat stress. 2. Thermal work limit has been established based on ambient temperatures, air flow and humidity. 3. Medical examination of red zone employees commenced to assess and drive the overall wellbeing goals for the Entity.
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. The KPIs are monthly tracked and reviewed at management level. Peer benchmarking has been undertaken within the Hindalco Group of companies.

Document Control and Version History

Revision	Date	Notes
0	22 December 2022	Initial Certification Audit – Full Certification
1	31 March 2025	Surveillance Audit