
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

HINDALCO INDUSTRIES LTD (ALUPURAM WORKS)

CERTIFICATE
NUMBER

296

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

CETIZION
VERIFICA

DATE OF ISSUE

18 JULY 2023

DATE OF EXPIRY

17 JULY 2026

CERTIFIED SINCE

18 JULY 2023

AUTHORISED BY

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

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*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 Aluminium alloy extruded
products at the Alupuram facility, India.

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	HINDALCO INDUSTRIES LTD (ALUPURAM WORKS)
ENTITY NAME	HINDALCO INDUSTRIES LTD (ALUPURAM WORKS)
CERTIFICATION SCOPE	Manufacture and supply of Aluminium alloy extruded products at the Alupuram facility, India.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesSemi-FabricationMaterial Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (28 April – 2 May 2023)Surveillance Audit (28 – 30 January 2025)
AUDIT FIRM	Cetizion Verifica
AUDIT DATE	<ul style="list-style-type: none">28 April – 2 May 2023 (Initial Certification Audit)28 – 30 January 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">14 June 2023 (Initial Certification Audit)2 June 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (28 April – 2 May 2023)</u></p> <p>The Audit Scope covered the manufacture and supply of Aluminium alloy extruded products at the Alupuram facility, India.</p> <p>The supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium Re-melting/RefiningCasthousesMaterial Conversion (Production and Transformation)Other manufacturing or sale of products containing Aluminium <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>

Surveillance Audit (28 – 30 January 2025)

The Audit Scope covered the manufacture and supply of Aluminium alloy extruded products at the Alupuram facility, India.

The supply chain activities included in the audit scope:

- Aluminium Re-melting/Refining
- Casthouses
- Material Conversion (Production and Transformation)
- Other manufacturing or sale of products containing Aluminium

Criteria that were identified as non-conformities from the previous Audit 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

18 July 2023 – 17 July 2026

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

17 July 2026

CERTIFICATE
NUMBER

296

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has identified applicable legal requirements, and the Unit Head chairs periodic monitoring meetings. The Entity has integrated a digital compliance tool into existing processes, and has developed procedures for legal compliance audits, which require periodic independent compliance audits.
1.2 Anti-Corruption	Conformance	The Entity has established a Business Value Committee which has overall responsibility and accountability for anti-Corruption. The Committee works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. An anti-Corruption risk assessment has been undertaken as part of the Human Resources risk assessment. There is also a reporting mechanism, as outlined in the Whistle Blower Policy: https://www.hindalco.com/upload/pdf/hindalco-whistle-blower-policy-19.pdf
1.3 Code of Conduct	Conformance	The Entity has implemented the Hindalco Corporate Principle and Corporate Principles and Code of Conduct, released 12 August 2022: https://www.hindalco.com/upload/pdf/hindalco-code-conduct.pdf Training is delivered on the Code of Conduct, corporate values and anti-bribery laws.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	There are various Policies across the Entity which address environment, social and governance (ESG) topics either as incorporated policies or as a stand-alone document. Statutory reporting on corporate governance is periodically reported to the regulatory body and Stakeholders: 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 ESG Policies are endorsed by the Entity's unit level management. Appropriate resources, including employees, finance and infrastructure are provided and reviewed monthly.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity's ESG policies are communicated to both internal and external Stakeholders as suitable e.g., displayed at the Entity, training of employees, available on the website, and focused interaction with the community under the corporate social responsibility programs and initiatives.
2.2 Leadership	Conformance	Commitment from senior management is reflected through the signing of each ESG Policy. The Entity has nominated a Management Representative as having overall responsibility and authority for ensuring conformance with the requirements of the ASI Performance Standard. The Management Representative is supported by a governance team, who have been trained on the requirements.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity is part of the Hindalco group-level Integrated Management System certification including the Environment Management System as per ISO 14001:2015: https://www.hindalco.com/about-us/certifications
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented the Hindalco social policies and guidelines, available in the central Human Resources tools, as well as other relevant documents such as the certified standing order (rule book) and Collective Bargaining Agreement. The Entity is part of the Hindalco 'Great Place to Work' certification in recognition of good human resources practices: https://www.hindalco.com/about-us/awards-accreditations
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity has implemented the Aditya Birla Group (ABG) level responsible sourcing Policies. However, there is no evidence of conformance with the prescribed ABG Sustainability Framework for its 'Tier One' suppliers, as stipulated in the requirements of the ABG Supply Chain and Procurement Policy. Supplier audits have been undertaken but have focused on quality issues, with no satisfactory evidence of the full coverage of the supplier Code of Conduct requirements nor the competency of the personnel who undertook these audits.</p> <p>There is however no satisfactory evidence that all applicable requirements of the Supplier Code of Conduct have been assessed, non-conformities (if any) have been agreed upon and addressed, and that the closure status has been monitored.</p>
2.5 Impact Assessments	Conformance	The Entity has an expansion plan to establish a powder coating line. There is a documented Capital Expenditure Management System (CEMS) Manual that details the

CRITERION	RATING	COMMENT
		step-by-step process activities. The project was subject to a comprehensive review assessing ESG aspects and other project requirements at the Entity and Corporate levels, and progress is tracked via the Enterprise Resource Planning (ERP) tool.
2.6 Emergency Response Plan	Conformance	In consultation with the Trade Union representative, the Entity has reviewed and updated the on-site Emergency Response Plan. The Plan includes information on the types of emergencies requiring evacuation, as well as a management plan for each type of emergency and its frequency. Mock drills have been conducted, and records have been maintained.
2.7 Mergers and Acquisitions	Conformance	The Entity has established internal processes for Due Diligence, as per the internal Environmental and Social Impact Assessment (ESIA) protocol, including mergers and acquisitions. There has been no merger or acquisition during the past three years.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established internal processes to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment. There has been no closure, decommissioning or divestment activity during the past three years.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity is part of the Hindalco Group's sustainability performance reporting process, with its data publicly disclosed in the Integrated Annual Report, which is prepared in accordance with the Global Reporting Initiative (GRI) Guidelines and other reporting protocols: https://www.hindalco.com/investors/integrated-report/annual-reports
3.2 Non-compliance and liabilities	Conformance	The Entity discloses information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in the Integrated Annual Report. There have been no significant fines, judgments, penalties and non-monetary sanctions as disclosed in the Integrated Annual Report 2023-24: https://www.hindalco.com/upload/pdf/hindalco-annual-report-2023-24.pdf
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes payments to governments for applicable taxes, such as Goods and Service Tax (GST) in India, import duty or income tax, on a legal or contractual basis.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented a grievance handling procedure that defines various means of receiving grievances, the management of the escalation of grievances and response times. The Entity has a Whistleblower Policy which is available at: https://www.hindalco.com/upload/pdf/hindalco-whistle-blower-policy-19.pdf There are no complaints received from external Stakeholders since the last Audit.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major Product. A Life Cycle Assessment (LCA) study was conducted using a cradle-to-gate methodology as per ISO 14040 and ISO 14044. The detailed report addresses system boundaries, impact categories, and global warming potential (GWP) amongst other aspects.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The LCA study was conducted using cradle-to-gate methodology, as per ISO 14040 and ISO 14044. The Entity also shares the LCA with customers and other interested parties upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The LCA study was conducted using cradle-to-gate methodology, as per ISO 14040 and ISO 14044. The LCA related disclosure are available in the Integrated Annual Report 2023-24: https://www.hindalco.com/upload/pdf/hindalco-annual-report-2023-24.pdf
4.2 Product design	Conformance	The Entity does not have specific product design responsibility. Product specifications are documented based on customers' specific requirements. However, some process improvements have sustainability benefits, such as the reduction in process scrap (spoilage) and process control parameters.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has established internal targets for the reduction of Aluminium Process Scrap (spoilage), which are tracked on a monthly basis. The internal Aluminium Process Scrap is 100% collected, segregated as per alloy/grade, remelted and reused.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The internal Aluminium Process Scrap is 100% collected, segregated as per alloy/grade, remelted and reused. The chips (small scrap size) from extrusion and the casting workshop are collected and sent to an external supplier before their return to the Entity as Aluminium ingots.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity is bound by a Corporate level strategy, which includes recycling targets and engagement with various

CRITERION	RATING	COMMENT
		Stakeholders to increase the collection and recycling rates. The related disclosures are made in the Integrated Annual Report 2023-24: https://www.hindalco.com/upload/pdf/hindalco-annual-report-2023-24.pdf At a unit level, the Entity engages with the local recycling ecosystem to increase recycling rates
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	At a Unit level, the Entity engages with the local recycling ecosystem to increase recycling rates. At the corporate level, efforts to increase the recycling rate are determined via policy, advocacy, engagement and the collection of Scrap materials from customers.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Group-level energy use and Greenhouse Gases (GHG) emissions disclosure is available in the Integrated Report 2023-24, pages 145-152: https://www.hindalco.com/upload/pdf/hindalco-annual-report-2023-24.pdf The Entity has commissioned two megawatts (MW) of additional captive solar plant capacity, which brings the total to 5 MW.
5.2 GHG emissions reductions	Conformance	The Group level 'Decarbonisation Roadmap' and the Entity level GHG Emissions Reduction Plans, which include targets through 2025, have been disclosed in the Integrated Annual Report 2023-24, pages 53 and 149-154: https://www.hindalco.com/upload/pdf/hindalco-annual-report-2023-24.pdf A monthly review of Greenhouse Gas (GHG) and emission performance is conducted at the corporate level.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity monitors its stack emissions according to its Integrated Consent to Operate (ICO), issued by the Kerala State Pollution Control Board. Emissions to Air are assessed by an approved external laboratory on monthly basis. ` A periodic compliance report is submitted to government authorities as per the ICO

CRITERION	RATING	COMMENT
		conditions. The Entity implements measures to minimise air pollution beyond conformance with legal compliance requirements such as switching to alternate fuels. Air emission levels are communicated to Stakeholders and interested parties as per statutory requirements.
6.2 Discharges to Water	Conformance	The Entity monitors its Discharges to Water as per the Integrated Consent to Operate (ICO), issued by the Kerala State Pollution Control Board. The Entity operates functional sewage treatment plants and a process effluent treatment plant. The Entity is working towards becoming a zero discharge facility. The monthly treated wastewater parameters (including pH, Biological Oxygen Demand (BOD), oil and grease) are checked by an approved external laboratory.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has implemented the Hindalco corporate procedure to conduct an assessment of the major risk areas of their operations where Spills and Leakage may occur. The risk assessment has been updated and addresses Spills and Leakage across business activities including casting, extrusion, and mechanical operations which may contaminate air, water and/or soil. Secondary containment measures have been improved since the previous Audit and were also inspected as part of this Audit.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed a management plan and implemented control measures to contain and prevent Spills and Leakage in accordance with the risk assessment. There is an internal process to collect the Spills performance data for periodic review. Since the previous Audit, secondary containment measures have been improved since the previous Audit and were also inspected as part of this Audit. (e.g., caustic soda and used oil areas).
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has established a practice for the immediate reporting of Spills and Leakage. Spills are detected through various mechanisms including the workmen register and management walk-throughs and are recorded in an incident register. During the plant inspection as part of the Audit, no Spills or Leakage was found.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity reports annually on Spills and Leakages through the Environment Statement (Form V). There is an internal system to report and track the closure of any incidents. The reporting of Spills and Leakages is also addressed in the Integrated Annual Report 2023-

CRITERION	RATING	COMMENT
		24: https://www.hindalco.com/upload/pdf/hindalco-annual-report-2023-24.pdf
6.5a Waste management and reporting (strategy)	Conformance	The Entity meets the legal requirements for waste management and reporting as per the Integrated Consent to Operate (ICO), issued by the Kerala State Pollution Control Board. Waste generated is segregated and stored before disposal to an authorised agency. The annual disclosure of Hazardous and Non-Hazardous Waste generated and its disposal is indicated in the Environment Statement, Form V as per statutory requirements. The Entity is working toward a goal of zero waste to landfill by 2025.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity reports on Waste management via the annual sustainability reporting function, the communications board near the Entity's main gate and via statutory reporting requirements for relevant authorities. The quantities generated and disposal methods are disclosed in the 2023-24 Integrated Annual Report on pages 164-169: https://www.hindalco.com/upload/pdf/hindalco-annual-report-2023-24.pdf
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Conformance	Dross is generated from the remelt furnace, which is located within a designated area. Dross is recovered by the Entity and sent to an external authorised agency for treatment.
6.8b Dross (recycling)	Conformance	Dross is generated from the remelt furnace, which is located within a designated area. Dross is sent to an external authorised agency to maximise the recycling of treated Dross residues.
6.8c Dross (review of alternatives)	Conformance	The Entity works closely with an external authorised agency that handles Dross residues to explore alternative ways to prevent landfilling.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity's sources its water the nearby Periyar River, as per its ICO permit. The Entity has developed a water balance diagram that is updated monthly. The water flow meter calibration certificate by the manufacturer is available.
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity is located within an area of high rainfall, with an average annual rainfall of over 3,000 millimetres (mm), with approximately 132 average annual rain days. Water-related risks are addressed in the Entity's Environmental Management System aspect-impact analysis which incorporates water-related risks and measures including nearby communities. An external agency conducted a water neutrality assessment that assessed watershed areas in August 2024. The water risk assessment for all plants to attain water circularity and zero liquid discharge is disclosed in the Integrated Annual Report 2023-24, page 47:</p> <p>https://www.hindalco.com/upload/pdf/hindalco-annual-report-2023-24.pdf</p> <p>As per World Resources Institute (WRI) Aqueduct, confirmed that the overall water risk in the Entity's Area of Influence is extremely high:</p> <p>https://www.wri.org/applications/aqueduct/water-risk-atlas/#/?advanced=false&basemap=hydro&geoStore=79ffdc6cc0ccfba17b26311855465df2&indicator=w_awr_def_tot_cat&lat=30&lng=-80&mapMode=analysis&month=1&opacity=0.5&pondration=DEF&predefined=false&projection=absolute&scenario=optimistic&scope=baseline&threshold&timeScale=annual&year=baseline&zoom=3</p>
7.2a Water management (management plans)	Conformance	The Entity has implemented the Group level Water Stewardship Policy as well as a technical standard for

CRITERION	RATING	COMMENT
		water management. Examples of actions included in the water management plans include the redirection of water from an underground pipeline to an overhead pipeline and rainwater harvesting projects.
7.2b Water management (monitoring)	Conformance	Daily water consumption is monitored using flow meters and these data are further consolidated in monthly reports. The statistical analysis is undertaken for performance improvements and the decision-making process on a monthly basis. Specific Water Consumption (SWC) per tonne of finished goods is tracked as a key metric.
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity's water-related targets, water usage and water-related risks are disclosed in the Integrated Annual Report 2023-24, pages 155-162: https://www.hindalco.com/upload/pdf/hindalco-annual-report-2023-24.pdf</p> <p>In addition, the Entity reports its water performance data to relevant government authorities in accordance with its disclosure requirements.</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has re-conducted their biodiversity assessment since the previous Audit with a current focus on carbon sequestration. There are no National Parks or Protected Areas within a ten-kilometre radius of the Entity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has developed and implemented a Biodiversity Action Plan based on the outcomes of the biodiversity assessment. The updated biodiversity management plan (known as the Natural Capital Action Plan) includes tasks including the management of invasive species, management of termite attacks on trees, development of butterfly garden and snake management plan.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Plan is discussed during the Entity level sustainability meetings, and town hall meetings, as well as with the nearby community via the Corporate Social Responsibility (CSR) program personnel.
8.2c Biodiversity management (reporting)	Conformance	Biodiversity related disclosures are provided through the Integrated Annual Report 2023-24, pages 141-153: https://www.hindalco.com/upload/pdf/hindalco-annual-report-2023-24.pdf
8.3 Alien Species	Conformance	The Entity has conducted a risk assessment of the potential impacts of invasive and Alien Species as part of the Biodiversity risk assessment and has

CRITERION	RATING	COMMENT
		<p>implemented mitigation measures accordingly. In practice, wooden pallets received with import consignments are fumigated according to relevant International Standard for Phytosanitary Measure (ISPM) standards.</p> <p>There is an invasive plant called Sububul (<i>Leucaena leucocephala</i>), present on site with removal undertaken in a controlled manner, and work is ongoing to eliminate the plant within the next two years without using pesticides.</p>
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 adheres to a corporate level Human Rights Policy, revised in August 2022, having a formal commitment to fulfil national and international Human Rights obligations and undertake the necessary Due Diligence:</p> <p>https://www.hindalco.com/upload/pdf/human-right-policy.pdf</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has established a Human Rights Risk Register, which addresses internal and external business activities including Child Labour, Forced Labour, working hours, health and safety, along with existing mitigation measures that are implemented and monitored.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity has developed adequate remedial measures to manage violations of any Human Rights e.g., Complaints Grievance Mechanism, a Whistleblower Policy and detailed guidelines in the Corporate Principles and Code of Conduct. Both available at:</p> <p>https://www.hindalco.com/upload/pdf/hindalco-code-conduct.pdf and</p> <p>https://www.hindalco.com/upload/pdf/hindalco-whistle-blower-policy-19.pdf</p>

CRITERION	RATING	COMMENT
9.2 Women's Rights	Conformance	<p>Human Rights including Women's Rights are addressed in the Corporate Human Rights Policy: https://www.hindalco.com/upload/pdf/human-right-policy.pdf</p> <p>Specific benefits such as maternity leave are provided for women employees. The Prevention of Sexual Harassment (POSH) Policy and guidelines are documented and made publicly available at: https://www.hindalco.com/upload/pdf/hindalco-posh-policy.pdf</p> <p>Interviews of female Workers confirmed that women's rights are respected. Training on women's rights is provided via e-learning and in-person. Information including the POSH Policy and grievance reporting channel is provided on display boards.</p>
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there is no presence of Indigenous Peoples or their lands, territories and resources identified.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as there is no presence of Indigenous Peoples and thus Free, Prior, and Informed Consent (FPIC) is not required.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable, as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Conformance	There are no resettlements being considered or have taken place during the period since the Entity joined ASI. However, the Entity has developed related guidelines on resettlement.
9.6b Resettlements (where unavoidable)	Conformance	There are no resettlements being considered or have taken place during the period since the Entity joined ASI. However, the Entity has developed related guidelines on resettlement.
9.7a Local Communities (rights and interests)	Conformance	There is an established integrated corporate social responsibility (CSR) approach to serve the Local Communities. The CSR projects are designed to meet Stakeholders' needs as well as respect the legal and customary rights and interests of Local Communities.
9.7b Local Communities (impacts)	Conformance	The Entity has developed CSR programs for its Local Communities, with the main focus areas addressing education, health, infrastructure support and sustainability programs such as tree planting.
9.7c Local Communities (livelihoods)	Conformance	The audit team visited three municipal wards and met with village/community heads, both male and female, and the school, to understand the impacts on

CRITERION	RATING	COMMENT
		livelihoods and the opportunities created by the Entity's business activities. The Entity has created a positive impact on the livelihood of Local Communities with employment opportunities. This was highlighted by the Local Community heads and villagers and also confirmed during Worker interviews.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has a formal commitment to avoid contributing to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas (CAHRAs). The Entity does not have any business relationships with other entities within CAHRAs. The Entity has implemented a Human Rights Policy and Supplier Code of Conduct: https://www.hindalco.com/upload/pdf/human-right-policy.pdf and https://www.hindalco.com/upload/pdf/annexure-IVa-hindalco-supplier-code-conduct.pdf
9.9 Security practice	Conformance	The Entity's security practices are addressed in relevant Human Rights risk assessments. There is a security officer in charge who has overall responsibility for security personnel deployment, duty rosters and leave approval. There are both private and permanent security guards operating on site.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has committed to Freedom of Association in the Human Rights Policy. There are three registered Trade Unions at the Entity. There are monthly meetings between Workers and management for permanent and contract Workers. This was assessed and cross-examined during Audit interviews with Trade Union representatives.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has committed to the right of Workers to Collective Bargaining in the Human Rights Policy. There are three registered Trade Unions representing employees at the Entity.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable, as the Entity operates in India where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The exclusion of Child Labour is incorporated in the corporate level Human Rights Policy, and includes a formal commitment to fulfil both national and international Human Rights obligations and undertake necessary Due Diligence on Child Labour. The Entity's existing practices ensure a minimum age of 18 years to allow entry into the plant. Proof of age

CRITERION	RATING	COMMENT
		documentation is available in employment files. No suspected case of Child Labour was found during the Audit.
10.2b Child Labour (hazardous)	Conformance	The Entity neither engages in nor supports Hazardous Child Labour in its business activities, as found during the plant visit, Worker interviews and review of hiring and job allocation records.
10.2c Child Labour (worst forms)	Conformance	The Entity neither uses nor supports the use of the Worst Forms of Child Labour and complies with related national and international law.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has developed policies and procedures that state that it will neither engage in nor support the use of Forced Labour or Human Trafficking, either directly or through any employment or recruitment agencies. This was confirmed during a review of employment records and randomly selected worker interviews.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has developed policies and procedures that state that it will neither engage in nor support the use of Forced Labour. The Entity does not require any form of Deposit, Recruitment Fee or equipment advance from Workers either directly or through employment or recruitment agencies.
10.3c Forced Labour (migrant workers)	Conformance	The Entity has developed policies and procedures that state that it will neither engage in nor support the use of Forced Labour. The Entity does not require any Migrant Workers to lodge deposits or security payments at any time.
10.3d Forced Labour (debt bondage)	Conformance	The Entity has developed policies and procedures that state that it will neither engage in nor support the use of Forced Labour. The Entity does not hold any Workers in Debt Bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has developed policies and procedures that state that it will neither engage in nor support the use of Forced Labour. The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity has developed policies and procedures that state that it will neither engage in nor support the use of Forced Labour. The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity has developed policies and procedures that state that it will neither engage in nor support the use

CRITERION	RATING	COMMENT
		of Forced Labour. The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length as stated in the employment agreement.
10.4 Non-Discrimination	Conformance	The Entity has developed policies and conducted a Human Rights risk assessment that addresses non-Discrimination to ensure equal opportunities and to not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to Discrimination. This was confirmed at the Audit via a review of training, promotion and wage information as well as Worker interviews.
10.5 Communication and engagement	Conformance	The Entity has implemented a practice of open communication and direct engagement with Workers and their Trade Union representatives regarding working conditions and the resolution of workplace and compensation issues. There are periodic review meetings between management and Trade Union representatives. The Workers have access to a grievance redressal system, and any Workers can raise issues without fear of reprisal or retaliation. These aspects were assessed during the Audit via a review of implementation records and interviews with Workers and their Trade Union representatives.
10.6 Disciplinary practices	Conformance	The Entity has a certified standing order as per its statutory requirements in which detailed statutory disciplinary practices (initially in the name of Indian Aluminium Company Limited, INDAL which was subsequently acquired in 2004) are displayed in work areas for employees.
10.7a Remuneration (living wage)	Conformance	The living wage calculation has been conducted, which considers a local socio-economic analysis (via randomly selected surveys of the workforce to collect primary data on family size and household costs associated with expenses such as food, transportation and accommodation). The majority of the workforce are members of a Trade Union and access to free accommodation, food and transportation to support school education is provided.
10.7b Remuneration (method of payment)	Conformance	There has been no change in remuneration practices since the previous Audit. Monthly salaries are paid through bank transfer. Overtime payments are made at

CRITERION	RATING	COMMENT
		<p>a premium rate. Payslips are emailed to each employee and include full details.</p> <p>An Employees Cooperative Society is present that offers concessional loans to Workers, regulated by prevailing acts and governance in place. There is no Overtime work undertaken at the Entity except working on national holidays as per duty roaster and is paid according to prevailing rates. The remuneration practices conform to country labour laws.</p>
10.8 Working Time	Conformance	<p>Working hours are recorded, including for Contractors and security personnel, through biometric machines. The working hours are set as per national laws. Public and national holidays are per legal requirements, plus sick leave, casual leave and privileged leave as per rules. The Entity is operational 24 hours a day, seven days a week and as such, employees working on public holidays are entitled to a premium payment as per legal norms. The Overtime analysis is undertaken monthly. The Entity complies with applicable national laws and the in-force Collective Bargaining Agreement.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has documented its Safety and Occupational Health Policy, which is disseminated to the workforce via displays and training, and is available at:</p> <p>https://www.hindalco.com/upload/pdf/safety-and-occupational-health-policy.pdf</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity has documented its Safety and Occupational Health Policy, which includes a reference to its applicability to the workforce and visitors. Periodic safety training is provided on the Safety and Occupational Health Policy. All Visitors undergo a mandatory safety briefing that addresses the Policy and the safety precautions to be followed by the Visitor. The Audit Team also underwent Visitor induction training that confirmed its effectiveness.</p>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	<p>The Entity has documented within its Safety and Occupational Health Policy a commitment to respect and implement national and international laws on Worker Health and Safety, as applicable.</p>
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	<p>The Entity has documented within its Safety and Occupational Health Policy a commitment to respect the 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	Minor Non-Conformance	<p>The Entity's Management System is ISO 45001 certified.</p> <p>https://www.hindalco.com/upload/pdf/certificate/IMS-alupuram-2023.pdf</p> <p>However, certain 'permit-to-work' documentation made available for review during the Audit did not include approved work permits by the designated Approving Authority.</p>
11.3 Employee engagement on health and safety	Conformance	<p>There is regular employee engagement related to health and safety through toolbox talks (TBT), and regular training (e.g. safe forklift operation). The Entity has established a Safety Committee comprising of management and Workers from various departments. The Entity has also developed a safety training plan for employees on various health and safety issues.</p>
11.4 OH&S performance	Conformance	<p>The Entity has established Key Performance Indicators (KPIs) including the number of minor accidents, reportable accidents and Lost Time Accident Rate (LTAR). The Entity evaluates and monitors its Occupational Health and Safety (OH&S) performance through monthly monitoring of KPIs and internal and external audits.</p>

Document Control and Version History

Revision	Date	Notes
0	18 July 2023	Initial Certification Audit – Full Certification
1	11 June 2025	Surveillance Audit