

ASI CERTIFICATION PERFORMANCE STANDARD

PRESENTED TO

Bharat Aluminium Company Limited (BALCO)

CERTIFICATE NUMBER

337

ASI STANDARD

PERFORMANCE
STANDARD
(V3.1 2023)

CERTIFICATION LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITING FIRM

CETIZION VERIFICA

DATE OF ISSUE

1 OCTOBER 2025

DATE OF EXPIRY

30 SEPTEMBER 2026

CERTIFIED SINCE

24 JANUARY 2024

AUTHORISED BY



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ACN 606 661 125, Australia
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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 Primary Aluminium product in the form of ingots, wire rod, billet, primary foundry alloys (PFA), ingot and flat rolled products, including low carbon Primary Aluminium (i.e., Restora and Restora Ultra), and the power generation plant at Korba, Chhattisgarh, India.

* Provisional Certification is valid for the period of one year, during which the company can address the non-conformances assessed and subsequently seek full certification.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Vedanta Limited (Aluminium Business)
ENTITY NAME	Bharat Aluminium Company Limited (BALCO)
CERTIFICATION SCOPE	Manufacture and supply of Primary Aluminium product in the form of ingots, wire rod, billet, primary foundry alloys (PFA), ingot and flat rolled products, including low carbon Primary Aluminium (i.e., Restora and Restora Ultra), and the power generation plant at Korba, Chhattisgarh, India.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthousesSemi-Fabrication
ASI STANDARD	Performance Standard V3.1
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit (28 August – 4 September 2023)Surveillance Audit (9 – 13 June 2025)
AUDIT FIRM	CETIZION Verifica
AUDIT DATE	<ul style="list-style-type: none">28 August – 4 September 2023 (Initial Certification Audit)9 – 13 June 2025 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">19 October 2023 (Initial Certification Audit)23 August 2025 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (28 August – 4 September 2023)</u></p> <p>The Audit Scope includes the manufacture and supply of Primary Aluminium product in the form of ingots, wire rod, billet, primary foundry alloys (PFA), ingot and flat rolled products, including low carbon Primary Aluminium (i.e., Restora and Restora Ultra), and the power generation plant.</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none">Aluminium SmeltingAluminium Re-melting/RefiningCasthousesSemi-Fabrication <p>All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (2025)</u></p> <p>The Audit Scope includes the manufacture and supply of Primary Aluminium product in the form of ingots, wire rod, billet, primary foundry alloys (PFA), ingot and flat rolled products, including low carbon Primary Aluminium (i.e., Restora and Restora Ultra), and the power generation plant.</p>

Supply chain activities included in the Audit Scope:

- Aluminium Smelting
- Aluminium Re-melting/Refining
- Casthouses
- Semi-Fabrication

All applicable Criteria in the ASI Performance Standard were included in the Audit Scope.

AUDIT OUTCOME

- Provisional 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

1 October 2025 – 30 September 2026

NEXT AUDIT TYPE

Re-Certification Audit

NEXT AUDIT DATE

30 September 2026

CERTIFICATE NUMBER

337



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

Bharat Aluminium Company (BALCO) (the 'Entity') was incorporated in 1965 as the first Public Sector Undertaking (PSU) in India. In 2001, the Government of India divested 51% of BALCO shares to Sterlite Industries Limited, a subsidiary of Vedanta Limited.

The Entity's manufacturing Facility is located in Korba, Chhattisgarh, India and includes a smelter (two potlines), carbon plant, three Casthouses, rolled product plant and captive power plant. The coal mines associated with the captive power plant are located in Chotia and Barra. BALCO's bauxite mines are in Kawardha and Mainpat (both are non-operational at present and not included in the Certification Scope).

The Entity is currently expanding its production capacity from 0.58 mtpa to 1 mtpa. The Entity is also incorporating an integrated Alumina handling system, a calcined petroleum coke handling system, and a flap gate handling system with an aim to reduce its carbon footprint, enhance the quality of products, and raise Value Added Products (VAP) capacity. Currently, the majority of the Alumina is imported along with other raw materials such as CPC, while other materials such as CT Pitch are domestically sourced.

The Facility includes accommodation and recreation facilities, administrative offices, a medical clinic, security offices, a heavy and mobile equipment maintenance area, and a laboratory. The workforce consists of permanent and contract Workers, both male and female. The Entity's key Stakeholders include Government authorities, communities in the Korba area, suppliers and contractors.

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.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Medium	Medium	High	MEDIUM
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has a legal function that reports to the Chief Executive Officer and the Enterprise Resource Planning (ERP) based tool, 'Compliance Insight', developed with support from an external agency, addresses all Applicable Laws following a 'maker-checker' system. The Entity has a documented compliance procedure that categorises the types of compliances. An independent third party audit is conducted annually.</p> <p>An Environment Clearance (EC) (EC22A008CGI77331) was granted by the Ministry of Environment, Forest and Climate Change in April 2022 for the addition of 5.1 LTPA (1,000,000 tonnes per annum) to a capacity of 10.85 LTPA. Periodic compliance with the EC conditions is reported and made available on the Entity's website. Documents are available at: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2022/04/1.-EC-BALCO-Smelter-10.85-LTPA.pdf and https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/08/10.85-LTPA.pdf</p> <p>An appeal on the EC granted for the expansion project, stating irregularities, was investigated by the National Green Tribunal (NGT), (Central Bench, Bhopal). The appeal (Number 12/2022) was disposed of: https://greentribunal.gov.in/gen_pdf_test.php?filepath=L25ndF9kb2NlbWVudHMvbmdd0L2NhczVkb2MvanVkZ2VtZW50cy9CSE9QQUwwMjAyMi0xMS0xNC8xNjY4NDEyOTI5MTE0OTM5MzYwNzYzNzFmNjAxYzNlZDUucGRm</p> <p>The Entity continues to maintain legal Compliance since the previous ASI Audit.</p>
1.2 Anti-Corruption	Conformance	<p>Anti-Corruption is addressed in the Entity's Code of Business Conduct and Ethics, page 5: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/03/Code-of-Business-Conduct-and-Business-Ethics.pdf</p> <p>The Entity conducts training to exposed departments or functions e.g., finance and commercial. There is an Ethics Committee comprised of unit-level and group-level representatives that responds to violations related to the Code of Business Conduct and Ethics or any 'whistleblower' issues. There is an overall systematic risk assessment including anti-Corruption and a mitigation plan which covers internal and external factors and Stakeholders.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity has implemented a Group level Code of Business Conduct and Ethics, last revised in March 2022, and is available on the website: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/03/Code-of-Business-Conduct-and-Business-Ethics.pdf</p> <p>The Code is included in Workers' induction training and during periodic refresher training for full time employees and contractors (Business partners).</p>
2. POLICY AND MANAGEMENT		

CRITERION	RATING	COMMENT
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has implemented a series of eleven Policies that address Environmental, Social and Governance (ESG) topics: https://www.balcoindia.com/sustainability/policies-standards/sustainability-policies</p> <p>There is a structured organogram to deploy the ESG Policies and framework, which is led by the CEO who acts as the ESG Chairperson, and anchored by the Chief Executive Officer (CEO) Metal who acts as the ESG Anchor. There is representation by various departments including Corporate Social Responsibility (CSR), Health, Safety and Environment (HSE), Biodiversity, and Renewable Energy, and which includes a 42% gender diversity.</p>
2.2a-c Leadership	Conformance	<p>The Entity has established a structure to deploy and implement the ESG Policies and ASI Performance Standard requirements through the Executive Committee and Management Committee, which is led by the CEO and includes the key leadership team who are responsible for providing relevant resources.</p>
2.3a Environmental and Social Management Systems – Environmental	Conformance	<p>The Entity is certified to related management standards including ISO 14001:2015, with the scope incorporating the Korba plant plus the thermal power plant, coal and bauxite mining, as well as ISO 14064 and ISO 50001:2011. Further detail is provided in the Integrated Annual Report 2022-23, page 42: https://www.balcoindia.com/annual-report/2022-23/</p>
2.3b Environmental and Social Management Systems – Social	Conformance	<p>The Entity has developed its Social Management System through the establishment of a Social Policy, Standard Operating Procedures (SOPs) for implementation, and objectives for topics such as diversity, and regular monitoring: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/04/Social-Policy.pdf</p> <p>Further information is available in the Integrated Annual Report 2022-23, page 27: https://www.balcoindia.com/annual-report/2022-23/</p>
2.4a-e Responsible Sourcing	Conformance	<p>The Entity has developed a Supplier Sustainability Policy as well as a Supplier Code of Conduct, available at: https://d2cwogunyrjif.cloudfront.net/wp-content/uploads/2025/04/Supplier-Sustainability-Policy.pdf https://d2cwogunyrjif.cloudfront.net/wp-content/uploads/2025/04/Supplier-Code-of-Conduct.pdf</p> <p>The Entity has commenced a practice of undertaking supply chain audits to assess supplier conformance with its Supplier Code of Conduct. The Due Diligence report includes a desktop assessment and site visit and addresses topics including modern slavery and other sustainability topics. The Entity has a Standard Operating Procedure (SOP) that outlines the criteria and process for the supplier Due Diligence, which addresses both products and services, and has been approved by the Chief Commercial Officer.</p> <p>Suppliers provide an annual declaration on modern slavery and training on the topic is provided.</p>

CRITERION	RATING	COMMENT
2.5a-g Environmental and Social Impact Assessments	Conformance	<p>An Environment Impact Assessment (EIA) has been undertaken by an externally approved agency for the Entity's ongoing project expansion activity in accordance with EIA notification 2004 by the Ministry of Environment, Forest & Climate Change. The detailed report indicates the baseline and impacts associated with the environment, social issues, employees, external Stakeholders, Biodiversity, additional raw material and consumables, and the Corporate Social Responsibility (CSR) budget. The expansion project-related reports are available at:</p> <p>Risk assessment: https://environmentclearance.nic.in/DownloadPfdFile.aspx?FileName=bNFF6VvBWmIV/9EW/qjzi++sy+lwmFcHopLJBSPyek2QqxX4LkfC0pIEP7nOX3YhJvMGOAeU5ss3cdAXz/B359yW/i3hm7PUBPd0vW2+2A8=&FilePath=93ZZBm8LWEXfg+HAIQix2fE2t8z/pgnoBhDIYdZCzxXKUKNIYED19hF6lJsjSB/5dvgiqKqMhxiRaJ4LDImYKePH7vlqdxpbU7f9F+vYSM=</p> <p>Environmental Clearance: https://environmentclearance.nic.in/onlineSearchnewrk.aspx?autoid=40778&proposal_no=IA/CG/IND/2536/2007&typep=EC</p> <p>Periodical progress is measured, monitored, and reported to Government authorities, and is disclosed at: https://d2zll9uefzbzxd.cloudfront.net/wp-content/uploads/2023/08/10.85-LTPA.pdf</p>
2.6a-h Human Rights Impact Assessment	Conformance	<p>The Entity's Human Rights Impact Assessment, which addresses aspects such as employment, access to clean air, water, sanitation, education, and community work, was included in the EIA that was undertaken by an externally approved agency in accordance with the EIA notification 2004 by the Ministry of Environment, Forest & Climate Change. The detailed report indicates the baseline, and impacts associated with the environment, social issues, employees, external Stakeholders, Biodiversity, additional raw material and consumables, and the Corporate Social Responsibility (CSR) budget. The expansion project-related reports are available at:</p> <p>Risk assessment: https://environmentclearance.nic.in/DownloadPfdFile.aspx?FileName=bNFF6VvBWmIV/9EW/qjzi++sy+lwmFcHopLJBSPyek2QqxX4LkfC0pIEP7nOX3YhJvMGOAeU5ss3cdAXz/B359yW/i3hm7PUBPd0vW2+2A8=&FilePath=93ZZBm8LWEXfg+HAIQix2fE2t8z/pgnoBhDIYdZCzxXKUKNIYED19hF6lJsjSB/5dvgiqKqMhxiRaJ4LDImYKePH7vlqdxpbU7f9F+vYSM=</p> <p>Environmental Clearance: https://environmentclearance.nic.in/onlineSearchnewrk.aspx?autoid=40778&proposal_no=IA/CG/IND/2536/2007&typep=EC</p> <p>Periodical progress is measured, monitored, and reported to Government authorities, and is disclosed at: https://d2zll9uefzbzxd.cloudfront.net/wp-content/uploads/2023/08/10.85-LTPA.pdf</p> <p>The Human Rights Impact Assessment for normal operations has been undertaken and mitigation measures identified, implemented and monitored.</p>
2.7a-f Emergency Response Plan	Conformance	<p>The Entity has developed on-site emergency plans identifying possible emergency situations both for both human and natural induced scenarios, for both the power plant and metal business. Necessary mitigation measures have been implemented and are monitored for effective implementation through periodic drills.</p>

CRITERION	RATING	COMMENT
		<p>The Emergency Response Plan (ERP) is submitted to relevant Government authorities and is available upon request to other interested parties. The related information is disclosed in the Integrated Annual Report 2024-25, pages 52 and 132: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p>
2.8a-d Suspended Operations	Conformance	<p>The Entity closed coal mining at Chotia-II in August 2024 due to "coal exhausted or mined" as per the approved mining plan. The required information was submitted to the respective authorities in accordance with Environment Clearance (EC) conditions, including the Chhattisgarh Environment Conservation Board, Central Ground Water Authority (CGWA), and the Divisional Forest Officer. The Entity continues its ESG commitments and Corporate Social Responsibility (CSR) projects are ongoing irrespective of closure of commercial operations.</p> <p>The Entity has rolled out a Business continuity plan, an enterprise risk management framework including business disruption scenarios along with mitigation measures and periodic status updates.</p>
2.9a-b Mergers and Acquisitions	Conformance	<p>The Entity has implemented a corporate level guideline for Mergers and Acquisitions that detail the relevance of ESG issues and considerations during Due Diligence processes as part of merger and acquisition activities: https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/Acquisitions-Divestment-and-Joint-Ventures-Due-Diligence.pdf</p> <p>There have been no mergers or acquisitions affecting the Entity since joining ASI.</p>
2.10a-b Closure, Decommissioning and Divestment	Conformance	<p>The Entity has implemented corporate level guidelines for closure, decommissioning and divestment plans that detail the relevance of ESG issues and considerations during Due Diligence processes as part of closure, decommissioning and divestment plans. The related guidelines are publicly available at: https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/Acquisitions-Divestment-and-Joint-Ventures-Due-Diligence.pdf https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/New-Projects-Planning-Processes-and-Site-Closure.pdf</p> <p>The Entity closed coal mining at Chotia-II in August 2024 due to "coal exhausted or mined" as per the approved mining plan. The required information was submitted to the respective authorities in accordance with Environment Clearance (EC) conditions, including the Chhattisgarh Environment Conservation Board, Central Ground Water Authority (CGWA), and the Divisional Forest Officer. The Entity continues its ESG commitments and Corporate Social Responsibility (CSR) projects are ongoing irrespective of the closure of commercial operations.</p>
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	<p>The Entity has published its Integrated Annual Report 2024-25, which includes sections for Stakeholder engagement (pages 28-30), ESG governance (pages 34-35), community of practices and Material ESG topics (pages 26-27). The Report is publicly available at:</p>

CRITERION	RATING	COMMENT
		https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf As part of the Vedanta, the Entity has undergone a double materiality assessment, conducted by an external agency.
3.2 Non-compliance and Liabilities	Conformance	There have been no significant fines, judgments, penalties or non-monetary sanctions at the Entity since the previous ASI Audit. The demands or penalties by the Government received prior to this time are under judicial process as per prevailing laws, and disclosure is provided in the Integrated Annual Report 2024-25, pages 188-191: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf
3.3a-c Payments to Governments	Conformance	The Entity has made payments to Government in local currency for tax-related purposes only. The related information is publicly disclosed in the Integrated Annual Report 2024-25, page 198: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has implemented a documented procedure for the Grievance Mechanism, available at: https://d2zll9uefzbzxd.cloudfront.net/wp-content/uploads/2023/03/Grievance-Mechanisms.pdf There is a designated Community Liaison Officer who has overall responsibility for managing grievances. There are multiple communication channels used to collect and/or receive grievances, including community visits, and a walk-in CSR Department office located at the main plant gate. The Entity continues to work with internal and external Stakeholders and maintains records of engagement and complaints. The effectiveness of the Entity's external Stakeholder engagement process was evaluated during the Audit.
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has conducted a cradle-to-gate Life Cycle Analysis (LCA) in accordance with ISO 14025:2006, ISO 14040:2006, and ISO 14044:2006, as well as the requirements outlined in the internal General Program Instructions 4.0. The scope of the Entity's LCA includes all the forms of Primary Aluminium, such as primary foundry alloys, billets, and wire rods. The functional unit is one tonne of Primary Aluminium Product mix.
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The Entity has conducted a comprehensive LCA of its Product mix, which includes details such as the scope of the study and system boundaries. The LCA is provided to customers and other interested parties on request.
4.2 Product Design	Conformance	The Entity develops Products as per customer requirements (e.g., sizes, material grade and packaging requirements) and follows applicable product standards e.g., Wire Rod standards AA1370, AA8030, AA8176, 6201. The sustainability considerations are factored into product and process development, manufacturing, and deliveries and are considered under the Entity's Life Cycle Assessment.

CRITERION	RATING	COMMENT
4.3a-b Aluminium Process Scrap	Conformance	All Aluminium scrap generated during manufacturing is collected, segregated, remelted, and reused within the plant. The Entity is currently developing scrap reduction and minimisation projects. Different grades of Aluminium scrap are collected and segregated to prevent inadvertent mixing.
4.4a-c Collection and Recycling of Products at End of Life – Material Conversion and other Manufacturing	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is engaging with relevant Stakeholders to assess and improve country-level Aluminium collection at the end of life for recycling to support the concept of the Circular Economy.

5. GREENHOUSE GAS EMISSIONS

5.1a-b Disclosure of GHG Emissions and Energy Use	Minor Non-Conformance	<p>The Entity has disclosed its energy consumption in GJ/Mt of metal produced and Greenhouse Gas (GHG) emissions intensity (Scope 1 and 2) in tonnes CO₂e/ tonne of Primary Aluminium in the Integrated Annual Report 2024-25, page 102: https://d2cwogunyrjif.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p> <p>The Entity's reported GHG emissions and intensity data are externally verified as part of the Vedanta Aluminium Group's Sustainable Development Report 2023-24, page 179-180: https://d1rbiogkeljwo5.cloudfront.net/wp-content/uploads/2024/10/Vedanta-Aluminium-Sustainable-Development-Report-FY-23-24.pdf</p> <p>However, there is no disclosure of Material supply chain-related GHG emissions, including Scope 3, Category 1, 3 and 4 as per ASI requirements in the Entity's Integrated Annual Report. Additionally, this report includes no reference to independent verification of reported GHG emissions for the 2024-25 financial year.</p>
5.2a Aluminium Smelter GHG Emissions Intensity – Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity, as the Smelter has been in operation since 1965.
5.2b Aluminium Smelter GHG Emissions Intensity – In production up to and including 2020	Major Non-Conformance	<p>The Entity has implemented the Vedanta group Energy and Carbon Management Technical Standard, which details the assessment methodology and process (point 4.2.1) and the energy and carbon management plan (point 4.2.2): https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/Energy-and-Carbon-Management.pdf</p> <p>The inventory includes both the thermal power plant and metal generation (smelter and auxiliaries). Consumption data are collected monthly from different ERP tools, collated and processed (calculated).</p> <p>The Entity's Scopes 1, 2 and 3 GHG emissions intensity for the 2025 financial year (FY) (April 2024 – March 2025) was 18.16 t CO₂e/tonne of Primary Aluminium.</p>

CRITERION	RATING	COMMENT
		<p>The Entity's Scopes 1 and 2 GHG emissions intensity for the FY 2024-25 was 15.93 t CO₂e, with a year-on-year reduction of 1.5% compared to FY 24 and a 2.2% reduction over the last three years.</p> <p>The Entity's GHG data is disclosed in the Integrated Annual Report 2024-25, page 102: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p> <p>However, the Entity did not demonstrate that its Mine to Metal GHG Emissions intensity had reduced by a minimum 10% over the previous three reporting periods. The Entity did not meet the threshold limit of 13 t CO₂e /t Al and the in-draft decarbonisation plan is not fully aligned to achieve the 2030 threshold limit of 11 t CO₂e /t Al.</p> <p>The Entity is working with an external agency to develop its decarbonisation road map to align with ASI requirements. The existing decarbonisation plan is being implemented with various abatement initiatives being delivered to reduce GHG emissions intensity.</p>
5.3a GHG Emissions Reduction Plans	Major Non-Conformance	<p>The Vedanta Group has a long term goal of 'Net Zero Carbon' by 2050. The Entity has developed a GHG Emissions Reduction Plan and is currently working with an external agency to revise the decarbonisation roadmap to align with the ASI requirements. However, at the time of the Audit, the Entity's decarbonisation roadmap had not been finalised to demonstrate that abatement plans aligned with the Entity's GHG Emissions Reduction Pathway.</p> <p>The Entity has used the ASI method to develop a GHG Emissions Reduction Pathway that is 1.5°C aligned. However, the Entity has not published its Pathway.</p> <p>The Entity's annual GHG emissions intensity data (Scopes 1 and 2) for 2022 to 2025, which demonstrates a 1.5% reduction from 2024 and 2.2% over the previous three years, are disclosed in the Integrated Annual Report 2024-25, page 103: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p> <p>However, the Entity has not demonstrated that its GHG emissions reductions are in line with either its Pathway or those reduction targets previously set.</p>
5.3b-e GHG Emissions Reduction Plans – Targets, review and disclosure	Minor Non-Conformance	<p>The Vedanta Group has a long term goal of 'Net Zero Carbon' by 2050. The Entity has used the ASI GHG Pathways Calculation Tool to develop a Pathway, with a 2021 baseline.</p> <p>However, the Entity has not publicly disclosed its GHG Emissions Reduction Pathway nor Intermediate Targets that address all Direct and Indirect GHG emissions. The Entity's GHG reduction targets disclosed in the Integrated Annual Report and the Vedanta Aluminium Sustainable Development Report 2023-24 are not consistent with the Pathway generated via the ASI methodology.</p> <p>Vedanta Aluminium Sustainable Development Report 2023-24: https://d1rbiogkeijwo5.cloudfront.net/wp-content/uploads/2024/10/Vedanta-Aluminium-Sustainable-Development-Report-FY-23-24.pdf</p> <p>BALCO Integrated Annual Report 2024-25, page 103: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p>

CRITERION	RATING	COMMENT
5.4 GHG Emissions Management	Minor Non-Conformance	<p>The Entity has implemented the Vedanta Group Energy and Carbon Management Technical Standard, which details the assessment methodology and process (point 4.2.1) and the energy and carbon management plan (point 4.2.2): https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/Energy-and-Carbon-Management.pdf</p> <p>The Entity has a certified ISO 50001:2018 Energy Management System that includes both the power plant and Smelter, with related disclosure in the Integrated Annual Report 2024-25, pages 104 and 111: https://d2cwogunyrjif.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p> <p>However, the Entity's GHG Management System and practices were not effective to achieve performance in line with its GHG emissions targets.</p>

6. EMISSIONS, EFFLUENTS AND WASTE

6.1a-f Emissions to Air	Conformance	<p>The Entity has a valid Consent to Operate (CTO) that addresses air emissions limits as per statutory requirements for both the metal produced and the thermal power plant processes. Metal produced includes the smelter, green anode plant, Casthouse, rolling and associated facilities. There is 24/7 online monitoring of Fume Treatment Plant (FTP) 1 and FTP 2 and other stacks. The review of documentation confirmed that pollutants including particulate matter and fluoride were below prescribed limits.</p> <p>During the plant visit and specific to the road connecting Casthouse 3 and the fire station, it was found that the implemented measures to reduce dust and upkeep road maintenance were satisfactory.</p> <p>The stack emissions and ambient air quality monitoring are done as per statutory requirements and are found within permissible limits. There is monthly stack emissions monitoring also conducted through an accredited testing agency and reports has been submitted to the State Pollution Control Board.</p> <p>The related disclosures are included in the Sustainable Development Report 2023-24, pages 83-85: https://d1rbiogke1jwo5.cloudfront.net/wp-content/uploads/2024/10/Vedanta-Aluminium-Sustainable-Development-Report-FY-23-24.pdf</p>
6.2a-g Discharges to Water	Conformance	<p>The Entity is a 'Zero Liquid Discharge' facility and there are no external water discharges. Groundwater samples are tested to monitor for groundwater contamination, and monitoring results are publicly available in the Half Yearly Compliance Status Report, pages 40-43: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/08/3.25-LTPA.pdf</p>
6.3a-g Assessment and Management of Spills and Leakages	Conformance	<p>It was identified in the Audit that there are adequate risk assessment and controls that address Spills and Leakage management. Spill kits are provided and periodically monitored, and training of responsible personnel is conducted. Spills and Leakage are addressed within the on-site emergency plan, which is submitted to concerned Government authorities and is available upon request to other interested parties.</p>

CRITERION	RATING	COMMENT
6.4a-b Public Disclosure of Spills and Leakages	Conformance	Spills and Leakage are addressed within the on-site emergency plan. Instances of Spills and Leakage are recorded and analysed to determine the root cause. External communication of any Spills and Leakages is undertaken via sustainability reports and annual environment statements. There have been no significant instances of Spills and Leakage reported during recent years.
6.5a-c Waste Management and Reporting	Conformance	<p>The Entity's Hazardous and Non-Hazardous waste data, waste management-related performance and plans are disclosed in the Integrated Annual Report 2024-25, pages 37, 102 and 105: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p> <p>Since the last ASI Audit, there has been no change to the fly ash dykes regarding their number, storage capacity and disposal, and safety precautions and environmental protections are in place, for example the early warning lightening monitoring system around the dyke area.</p> <p>Emergency Response Plans are available and periodic mock drills and undertaken with the district authority and Stakeholders (Local Community) every six months. The Entity conducts monthly groundwater monitoring in the surrounding hand pumps and dug wells.</p> <p>There is a task force that meets monthly at Vedanta Group level that considers global incidents to apply the lessons learnt from these incidents, e.g. Ghana Gold mine, failure of Beposo tailing storage facility.</p>
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Conformance	<p>The Entity has a documented procedure for the handling of Spent Pot Lining (SPL). The carbon portion is disposed by an externally approved agency. The Secured Landfill Site (SLF) within the Entity's plant area has been scientifically designed, constructed, and approved by the State Pollution Control Board. The necessary layout and design data are displayed near the SLF. Leachate tanks and an evaporation pond are connected to the SLF. During the Audit, the physical conditions were checked and found to be satisfactory. The refractory portion of SPL is stored in a covered shed with legacy stocks. There are ongoing discussions and sample testing with nearby cement plants for its recycling. The related disclosure is included in the Integrated Annual Report 2024-25, page 19: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p>
6.8a-d Dross	Conformance	<p>There are two Dross processing units that have been in operation since November 2022, operated by a group subsidiary company. Dross from the casthouse is transferred and further processed using hot recovery and cold recovery. The Aluminium recovered from the Dross is sent back to the Casthouse and the non-metal residue portion is sent externally to a briquette plant. There is a documented procedure for handling Dross and related aspects.</p> <p>The general working conditions in the Dross processing unit were found satisfactory both in terms of environmental protection and employees' health and safety.</p> <p>The related disclosures are available at the following:</p>

CRITERION	RATING	COMMENT
		<p>Integrated Annual Report 2024-25, page 19: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p> <p>Aluminium Sustainable Development Report 2023-24, page-170: https://d1rbiogkeljwo5.cloudfront.net/wp-content/uploads/2024/10/Vedanta-Aluminium-Sustainable-Development-Report-FY-23-24.pdf</p>
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	<p>The water intake from the Hasdeo River is via a dedicated canal and pipeline. There is a pump house and a water treatment plant which has three dedicated water pipelines. There are four effluent treatment plants and three sewage treatment plants.</p> <p>The Entity is a Zero Liquid Discharge (ZLD) facility and targets water neutrality by 2030. Records confirmed the average water consumption is below the allocated quantity in the Consent To Operate (CTO). Due to ZLD requirements, approximately four million cubic meters of freshwater is saved and over ten percent of water is recycled and reused.</p> <p>The Entity has developed and reviewed the water balance diagram, which is updated quarterly. Potable water supplied to neighbouring communities through the dedicated pipeline and managed by the Entity is provided 'free of charge'.</p> <p>The additional water requirements associated with the smelter expansion project is considered as part of the EIA, which states that the water requirements will be met from the existing allocation of, and by enhancing the utilisation of recycled water.</p> <p>The water risk assessment study which considered Watersheds in the Entity's Area of Influence was undertaken by an external agency. The overall operational (physical, regulatory, reputational basis) water risk level was assessed as 'low'. The overall water basin risk level, considering the presence of other thermal power plants in the districts of Korba where the Entity is located, is 'medium'. The degree of future water stress is high (40-80%).</p> <p>There is a practice to prepare a water balance diagram on a monthly basis covering the entire plants (Captive Power Plant, Smelter, township).</p> <p>The Entity's task force on water management reviews water performance on a monthly basis and records are maintained.</p> <p>Further information is available at the following: Integrated Annual Report 2024-25, page 37: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p> <p>Sustainable Development Report 2023-24, pages 86-90: https://d1rbiogkeljwo5.cloudfront.net/wp-content/uploads/2024/10/Vedanta-Aluminium-Sustainable-Development-Report-FY-23-24.pdf</p>
7.2a-e Water Management	Conformance	<p>The Entity has developed a documented Water Management Plan that addresses the measures taken and plans to achieve water-related goals. The Entity is audited by an external agency on its water management practices and achievement of goals toward water</p>

CRITERION	RATING	COMMENT
		<p>neutrality. Periodic water inspections are undertaken by an internal team and reported in the internal ERP-SAP system.</p> <p>During the plant visit and specific to the anode plant, no water Leakages were observed. The Entity has a practice to report any water Leakage incident and take any necessary measures.</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	<p>The Entity has undertaken a Biodiversity and Ecosystem Services assessment that incorporates the plant areas, mines, and other areas such as railway tracks. The Biodiversity assessment includes core and buffer areas within a ten kilometre radius. There is an existence of Asian elephants and leopards and the Entity has been working with the Forest Department and financed towards the development of an Asian Elephant corridor.</p> <p>The Entity has disclosed information regarding Biodiversity management in the Sustainable Development Report 2023-24, pages 167-168: https://dlrbiogkeljwo5.cloudfront.net/wp-content/uploads/2024/10/Vedanta-Aluminium-Sustainable-Development-Report-FY-23-24.pdf</p> <p>The Entity has also disclosed information in the standalone Integrated Annual Report 2024-25, pages 106-107: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p>
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Conformance	<p>The Entity has consulted with relevant Affected Populations and Organisations, including Stakeholders such as the Forest Department whilst prioritising its Ecosystem Services. The Biodiversity management plan has been developed and includes programs such as the restoration of village ponds. Progress against this program was assessed during the Audit and consultation with the Local Community.</p>
8.2a-g Biodiversity Management	Conformance	<p>The Entity has developed a Biodiversity Management Plan to address the risk and impact assessment and disclosed relevant information in the Sustainability Report. The Biodiversity Management Plan includes action items and Key Performance Indicators (KPIs) which are regularly monitored every quarter.</p> <p>The management plan includes activity plans such as a wildlife conservation plan with development of an Asian Elephant corridor in conjunction with the Government's Forest Department, restoration of village ponds over the next 10 years (2023-2033), conservation plan for threatened species through Stakeholder awareness and planting, development of water holes, capacity building with the Forest Department on issues such as human and elephant conflicts.</p> <p>The related disclosures are included in the Integrated Annual Report 2024-25, page 106: https://d2cwogunyrjff.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p>
8.3a-c Management of Priority Ecosystem Services	Conformance	<p>The Entity has developed a Biodiversity Management Plan that addresses the impact on Priority Ecosystem Services. The monitoring of plans and the effectiveness of mitigation measures are established.</p>
8.4 Alien Species	Conformance	<p>The Biodiversity assessment addressed the possibility of any accidental or deliberate introduction of Alien Species that could have</p>

CRITERION	RATING	COMMENT
		Material adverse impacts on Biodiversity and Ecosystem Services, and a mitigation hierarchy has been developed.
8.5a-b Commitment to “No Go” in World Heritage Properties	Conformance	<p>The Entity has made a commitment not to explore or make Major Changes in World Heritage Properties. This is addressed in relevant Policies, including the New Projects, Planning Processes, and Site Closure Management Standard, available at: https://d1rbiogkeijwo5.cloudfront.net/wp-content/uploads/2021/03/New-Projects-Planning-Processes-and-Site-Closure.pdf</p> <p>The Entity, through the holding entity (Vedanta), creates awareness and provides support to communities living in World Heritage Properties: https://vedantaaluminium.com/media/press-releases/list/on-world-heritage-day-vedanta-aluminium-launches-online-gallery-to-promote-local-handicrafts/</p>
8.6a-d Protected Areas	Conformance	<p>The Entity has made a commitment not to explore or make Major Changes in Protected Areas. This is part of the Entity's Biodiversity assessment and is addressed in relevant Policies, including the New Projects, Planning Processes, and Site Closure Management Standard, available at: https://d1rbiogkeijwo5.cloudfront.net/wp-content/uploads/2021/03/New-Projects-Planning-Processes-and-Site-Closure.pdf</p>
8.6e Protected Areas – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has developed a Human Rights Policy with reference to the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration on Human Rights and other relevant international instruments. It has been signed by the Entity's Chief Executive Officer and communicated to Stakeholders through periodic consultation, induction training, and via on-site display: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/04/Human-Rights-Policy.pdf</p> <p>The Entity has developed a Social Policy: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/04/Social-Policy.pdf</p> <p>The Entity has developed an Equal Opportunity Policy: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/03/Equal-Opportunity-Policy-Balco-2023.pdf-002.pdf</p> <p>Additionally, the Entity has a program to hire transgender Workers and has developed an Equal Opportunity and Deployment for Transgender Persons Policy. The Policy addresses an ‘implementation framework and structure design’ and activities such as sensitisation of existing employees to create awareness on inclusiveness, and the requirements of the Transgender Persons (Protection of Rights) Act,</p>

CRITERION	RATING	COMMENT
		<p>2019. The Entity has designated a 'complaint officer', as required under the Act. Further information is included in a media article:</p> <p>https://newsriveting.com/vedanta-balco-rolls-out-new-gender-reaffirmation-policy-for-lgbtq-employees/</p> <p>The Entity's Human Rights Due Diligence process is undertaken using a systematic approach, which includes risk indicators, Human Rights risks, and responsibilities for implementation of mitigation measures. The risk indicators predominantly address areas including wages and working hours, Health and Safety, youth and Child Labour, Forced and bonded Labour, gender-based Discrimination, transgender/LGBTQ rights, and community rights, with a special focus on vulnerable groups such as women, Scheduled Caste and Scheduled Tribes. This was demonstrated and verified during visits to community-led social projects.</p> <p>The Entity has implemented a grievance Policy and practices where each function has a grievance register (mainly for contract employees), a single point of contact, and an internal portal (mainly used by FTE employees). There is a Grievance Redressal Committee, led by the Entity's senior management.</p>
9.2a-e Gender Equity and Women's Empowerment	Conformance	<p>The Entity has developed an Equal Opportunity Policy, approved by the CEO and available on the Entity's website:</p> <p>https://d2z1l9uefzbxd.cloudfront.net/wp-content/uploads/2023/03/Equal-Opportunity-Policy-Balco-2023.pdf-002.pdf</p> <p>The Human Rights Due Diligence process addresses women's rights and transgender issues. The Entity is committed to a gender-neutral workplace and has established targets for female employment, including 25% in the total workforce and 12% in management positions by FY24, and is working to achieve these targets. The Entity empowers women through different means e.g., various Corporate Social Responsibility (CSR) projects, and has established a Diversity and Inclusion Committee which meets on a monthly basis.</p> <p>Interviews with women employees and observation during plant visits confirmed the Entity provides separate toilets, issues free menstrual products, provides female nursing staff, and there is a crèche facility at the plant (near the alumina canteen) and a Day Care in the township. The Entity conducts ongoing training and sensitisation programs for employees including contract Workers, and displays relevant information at the workplace.</p> <p>The Entity's diversity ratio is increasing with approximately 23% women employees (full time equivalent), with a target of 26% by 2026 and 30% by 2030. The major initiatives are emphasised during new hiring (min 50%) plus geographical diversity, that is, hiring from the north-east regions which are historically neglected in general.</p>
9.3a-i Indigenous Peoples	Conformance	<p>There are no designated Indigenous Peoples close to the plant and coal mining areas. There are Scheduled Caste and Schedule Tribes (locally called Adivasi) as designated by Indian Law having special citizen rights who are consulted with, as Community members, and are included in the Entity's CSR programs as beneficiary groups. This was demonstrated and verified during visits to community-led social projects.</p>

CRITERION	RATING	COMMENT
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Conformance	<p>There are no designated Indigenous Peoples close to the plant and mining areas (Bauxite mining is not operational and outside the scope of certification). There are Scheduled Caste and Schedule Tribes (locally called Adivasi) as designated by Indian Law having special citizen rights who are consulted with, as Community members, and are included in the Entity's CSR programs as beneficiary groups. This was demonstrated and verified during visits to community-led social projects.</p> <p>These vulnerable group of Communities were consulted with consideration of population mix in the society during the approval of the smelter expansion projects as part of the Environment Impact Assessment (EIA) notification, as mandated by Government authorities and which also included a public hearing under the supervision of government officials. The terms and conditions of approvals relating to project initiation or changes are available on the Entity website: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2022/04/1-EC-BALCO-Smelter-10.85-LTPA.pdf</p> <p>It is a suggested improvement to clearly indicate the percentage and number of Community members from vulnerable groups such as women, Scheduled Caste, Scheduled Tribes (Adivasi) that are consulted and/or beneficiaries of the Entity's CSR programs during the reporting period.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Conformance	<p>There are no designated Indigenous Peoples close to the plant and coal mining areas (Bauxite mining is not operational and outside the scope of certification). There are scheduled tribes as designated by Indian law who are consulted with as Community members and are included in the Entity's CSR programs. These Communities were consulted during the approval of the smelter expansion projects as part of the Environment Impact Assessment (EIA) notification, which also included a public hearing under the supervision of government officials. The terms and conditions of approvals relating to project initiation or changes are available on the Entity website: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2022/04/1-EC-BALCO-Smelter-10.85-LTPA.pdf</p>
9.5a Cultural and Sacred Heritage - Identification	Conformance	<p>The Entity works closely with Affected Populations to maintain and improve cultural heritage. The Entity formally celebrated Cultural Heritage Day and undertook related activities to spread awareness amongst Stakeholders and promote cultural heritage: https://www.balcoindia.com/news-room/press-releases/list/vedantas-balco-unveils-museum-to-preserve-its-celebrated-origins/</p> <p>Cultural heritage is addressed through the Entity's Policies and sustainability standards including the Environmental and Social Impact Assessment (ESIA), available at: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/03/ESIA-Standard.pdf</p> <p>The Entity has undertaken a mapping exercise to identify and assess the UNESCO-notified World Heritage Sites in its Area of Influence, and no sites were identified using the UNESCO database.</p>

CRITERION	RATING	COMMENT
9.5b Cultural and Sacred Heritage - Impacts	Conformance	<p>The Entity works closely with the Affected Population to maintain and improve cultural heritage. The Entity formally celebrated Cultural Heritage Day and undertook related activities to spread awareness amongst Stakeholders and promote cultural heritage: https://www.balcoindia.com/news-room/press-releases/list/vedantas-balco-unveils-museum-to-preserve-its-celebrated-origins/</p> <p>Cultural heritage is addressed through the Entity's Policies and sustainability standards such as the Environmental and Social Impact Assessment and Management Standard, available at: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/03/ESIA-Standard.pdf</p> <p>The Entity's CSR programs are designed to promote cultural heritage and capacity building among Affected Populations. This was assessed during consultation with the community during the audit.</p>
9.6a-i Displacement	Conformance	<p>The Entity has documented a Policy on Resettlement, which is addressed in the Environment and Social Impact Assessment and Management Standard: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/03/ESIA-Standard.pdf</p> <p>There has been no Resettlement or Displacement since the Entity joined ASI.</p>
9.7a-h Affected Populations and Organisations	Conformance	<p>The Entity has developed a Social Performance Standard on External Stakeholder Engagement: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/03/External-Stakeholder-Engagement.pdf</p> <p>The Entity has a designated Social Performance Manager and Community Liaison Officer. A documented social risk assessment has been conducted which addresses topics including Human Rights, environment, community, and socio-political issues. A Social Performance Steering Committee (SPSC) meets quarterly with a predefined agenda that includes a review of stakeholder engagement, the commitment register, and the Entity's social risk register.</p> <p>There are systematic and documented CSR programs across seven thematic areas covering agriculture, skills development, livelihood, and women's health. CSR programs reach 123 villages across four districts and provide benefits to over 150,000 families. It also includes vulnerable society groups such as women, Scheduled Caste, Scheduled Tribe (Adivasi) which are part of CSR program ideation and beneficiaries.</p> <p>Some of the flagship programs have been delivered since 2011, including the, Mor Jal Mor Maati, farm modernisation program, which has led to an increase in productivity and income for participating farmers. The number of farmers involved has increased from 700 in 2021 to over 2,500 this year. The program is managed by the national-level Non-Government Organisation (NGO) 'Action for Food Production'. The Vedanta Agriculture Resource Centre has been established as part of the project, and is managed by the Farmer Producer Organisation (PFO). The village level CSR program is managed by a Village Development Committee as a means of good governance practices.</p>

CRITERION	RATING	COMMENT
		<p>The Entity also provides skills development support at the Vocational Training Centres (which is 5-star rated by the National Sector Skill Council), which has approximately 1,000 students participating each year in the training of trades and skills. Approximately 75% of students find placement within the Entity or its partner organisations.</p> <p>It is a suggested improvement that the Entity further promote engagement with local NGOs, preferably those actively working in tribal affected areas and/or the management team is representative of such vulnerable groups, participation during CSR program ideation, and program outcome evaluation to make CSR programs even more inclusive, effective and efficient to fulfil intended purposes.</p> <p>The Entity has progressed its CSR program since the previous ASI Audit, with visits to villages nearby to the plant and ash dyke areas by the Audit Team, which included a Local Communities specialist.</p> <p>The CSR Committee of the Board oversees and reviews the Entity's CSR activities. In compliance with Section 135 of the <i>Companies Act 2013</i> related disclosure are included in the Integrated Annual Report 2024-25, pages 159-161: https://d2cwogunyrjf.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p>
9.8a Conflict-Affected and High-Risk Areas - Strong management systems	Conformance	<p>The Entity has developed a Supplier and Business Partner Sustainability Management Policy and a Supplier Code of Conduct, which is communicated to its supply chain and is available on the Entity's website: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/04/Supplier-Sustainability-Policy.pdf and https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/09/Supplier-Code-of-Conduct.pdf</p> <p>The Policy, implementation, and supplier engagement practices confirm that the Entity does not support and is not involved in armed conflict or Human Rights abuses.</p> <p>The Entity has developed management practices to address Conflict-Affected and High-Risk Areas (CAHRAs) through the development and implementation of a CAHRAs Policy and a Standard Operating Procedure for supplier Due Diligence and screening through the five steps of the OECD Due Diligence Guidance of Minerals from Conflict-Affected and High-Risk Areas.</p>
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	<p>The Entity has conducted risk-based Due Diligence in accordance with of OECD Guidance (Step 2) to assess any 'red flags' of suppliers in its Aluminium supply chain, including the Bauxite mine origin and transit routes, using international indices such as CAHRA-EU and CAHRA-TDi.</p>
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Conformance	<p>The Entity has developed its strategy to respond to CAHRA-related risks and any red flags through closer supplier engagement, development of time bound corrective action plans, progress review of suppliers' actions, and a Grievance Mechanism. It has been detailed in applicable procedures and supplier Due Diligence reports.</p>
9.8d Conflict-Affected and High-Risk Areas - Audit of due diligence	Conformance	<p>The Entity's Due Diligence practices have been audited as part of this ASI Performance Standard Audit, which meets the requirements of this Criterion.</p>

CRITERION	RATING	COMMENT
9.8e Conflict-Affected and High-Risk Areas - Report annually	Minor Non-Conformance	The Entity has developed a Supply Chain Due Diligence Report in accordance with the OECD Guidance. However, the Report is yet to be disclosed as either a standalone document and/or part of the upcoming ESG report, expected by the end of October 2025.
9.9 Security practice	Conformance	<p>The Entity has implemented the Vedanta group Technical Standard on Security Management: https://www.vedantalimited.com/uploads/esg/esg-sustainability-framework/Security-Management.pdf</p> <p>There is a dedicated Balco Security Training School to train security personnel, who are employed through an external agency. Human Rights is addressed in the training curriculum (through 16 modules), with training records maintained and progress statistics monitored.</p>
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	The Entity's Workers are free to join Labour Unions and to Collectively Bargain. The Bharat Aluminium Mazdoor Sangh (INTUC) is a registered Labour Union and recognised by the Chhattisgarh Industrial Relation Act 1960. The Entity has various committees (including shop council, central safety, SBU safety, cultural, township, hospital and canteen management) that includes both Workers and management representatives and which meet frequently.
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as it operates in India where Applicable Law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a-c Child Labour	Conformance	The Entity has developed a Policy to prohibit the engagement of Child Labour and has implemented various controls including physical observation and review of Workers' age through education certificates and/or national identity cards. Worker interviews and observation during the plant visits, found no suspected cases of Child Labour.
10.3a-c Forced Labour	Conformance	<p>The Entity has developed various Policies prohibiting Forced Labour conditions during employment, including the Human Rights Policy: https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/04/Human-Rights-Policy.pdf</p> <p>The Entity requires statements and declarations on Modern Slavery to be communicated and acknowledged by its supply chain partners: https://vedantaaluminium.com/wp-content/uploads/2021/04/ilovepdf_merged.pdf</p> <p>As part of the Vedanta Group, the Entity has established practices to ensure compliance with the <i>Modern Slavery Act 2015</i> and, through its holding company (Vedanta Resources), discloses an annual Slavery and Human Trafficking Statement, as required by the Act: https://vedantaresources.com/uploads/more-information/human_trafficking_act/Modern_Slavery_Act_Statement_FY24.pdf</p>
10.4a-c Non-Discrimination	Conformance	The Entity does not discriminate and is an equal-opportunity employer. This is addressed in related Policies and practices, and was confirmed during Worker interviews and a review of records related to

CRITERION	RATING	COMMENT
		<p>hiring, training, promotion, disciplinary actions, Overtime, and career development. The random selection of employees for Worker interviews, which assessed the effectiveness of non-Discrimination Policies, included peoples belonging to Scheduled Caste and Scheduled Tribes. Further information is available in the Code of Business Conduct and Ethics and the Human Rights Policy:</p> <p>https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/09/Code_of_Business_Conduct_and_Ethics</p> <p>https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/04/Human-Rights-Policy.pdf</p>
10.5 Communication and engagement	Conformance	<p>The Entity implements comprehensive employee engagement activities and has been externally recognised e.g., ‘Great place to work’:</p> <p>https://www.balcoindia.com/about-us/awards-recognitions/</p> <p>There is a structured Learning and Development sub-function under the Human Resources department. The Entity implements a detailed employee engagement plan and training calendar and includes initiatives such as ‘coffee with ‘Human Resources’’, internal surveys and employee awards. Internal employee surveys are undertaken and an employee engagement survey is conducted by an external agency. Townhall meetings occur each quarter and the Entity maintains related documentation including meeting minutes and photographs.</p> <p>The Entity provides a daily email communication, ‘Balco Patrika’, presenting a highlight of the day. The Entity also circulates a printed quarterly newsletter that includes key employee-related communications.</p>
10.6a-g Violence and Harassment	Conformance	<p>The Entity has established Policies to prohibit Violence and Harassment in the workplace. There are effective grievance redressal mechanisms, which were confirmed during Worker interviews. The random selection of employees for Worker interviews, which assessed the effectiveness of non-Discrimination Policies, included peoples belonging to Scheduled Caste and Scheduled Tribes. The reporting hotline is displayed within the plant area. The Code of Business Conduct and Ethics is available at:</p> <p>http://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/09/Code_of_Business_Conduct_and_Ethics.pdf</p>
10.7a-d Remuneration	Conformance	<p>A minimum wage is mandated by the Chhattisgarh Government. The Entity’s actual wage paid is above the minimum wage and additionally includes allowances such as canteen allowance, and a conveyance allowance. There are Workers who are covered under a Long Term Settlement (LTS) at a higher negotiated wage rate.</p> <p>Wages are paid on the last day of the month via bank transfer for all Workers, including contract Workers (previously paid on a different day). Payslips are provided to Workers and includes details including working hours, social security deduction, and allowances. Overtime worked is paid at a premium rate in accordance with Indian Law.</p>
10.8a-c Working Time	Conformance	<p>Working hours are recorded through a biometric attendance system for contractor Workers and face recognition for Full Time Equivalent (FTE) Workers. The Entity has implemented four work shifts for general Workers for 48 hours/week over Monday to Saturday and three shift</p>

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		<p>schedules of 48 hours/week over six days. The shift schedule is on a rolling basis as per job requirements. Annual leave is comprised of casual leave, sick leave, privilege leave plus national/festival holidays.</p> <p>The Entity monitors Working Time and Overtime using a gate pass system which prevents any employee from working continuously on the seventh day after six consecutive workdays, without prior approval. Such a situation would be exceptional, such as in the case of plant and equipment breakdowns. The CEO's office and Human Resources department prepare and review monthly Working Time and Overtime.</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers on their Rights, as was confirmed during Worker interviews. The Entity displays information on the minimum wage and human resources-related Policies within the plant area, and informs Workers of their Rights during induction and periodical/refresher training.
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	<p>There is a corporate structure/organogram relating to safety which comprises of five sub-functions. The Entity has a documented Occupational Health and Safety (OH&S) Management System certified to ISO 45001:2018 and related Policies and technical standards. Salient features of the Management System and the Entity's Health, Safety, Environment and Sustainability (HSE&S) Policy are available on the website: https://www.balcoindia.com/sustainability/occupational-health-safety/ and https://d2z1l9uefzbzxd.cloudfront.net/wp-content/uploads/2023/04/HSES-Policy.pdf</p> <p>The HSE&S Policy addresses suppliers, business partners, and Stakeholders, and is approved by the Entity's CEO.</p> <p>The Entity has maintained its ISO 45001:2018 certification, as disclosed in the Integrated Annual Report 2024-25, page 111: https://d2cwogunyrjif.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p>
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The Entity has implemented a certified OH&S Management System. Periodic safety reviews are undertaken e.g. daily toolbox talk in each area lead by the section Safety Officer and a daily meeting chaired by the deputy CEO to review safety performance covering Power and Metal functions which follows a well-defined agenda. Monthly safety reviews are conducted by the CEO and management team to address topics including workplace safety, health examination, CCTV, road conditions and review of leading and lagging indicators (including near miss effectiveness index, interlock bypass compliance, and fatal accidents).</p> <p>The Entity periodically monitors its OH&S performance using both leading and lagging indicators, and undertakes peer comparison, as disclosed in the Integrated Annual Report 2024-25, pages 7 and 134: https://d2cwogunyrjif.cloudfront.net/wp-content/uploads/2025/06/Integrated-Annual-Report-FY-2024-25.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	The Entity has distributed a recent memorandum which informs concerned Workers on the re-constitution of the Central Safety Committee. The Committee includes equal membership of Trade

CRITERION	RATING	COMMENT
		Union members and management representatives. Formal meetings are held every three months. Minutes of meetings are circulated to all concerned through email, and are displayed on the notice board in both Hindi and English.

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DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	24 January 2024	Certification Audit – Full Certification
1	1 October 2025	Surveillance Audit – Provisional Certification