



Rehabilitation, Resettlement and Protection of Indigenous People Policy

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*Placed before the Board of Directors at its meeting held on February 13, 2024, and reviewed/approved thereat.

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REHABILITATION, RESETTLEMENT AND PROTECTION OF INDIGENOUS PEOPLE POLICY

Document ID/Name	Rehabilitation, Resettlement and Protection of Indigenous People Policy of Hindalco Industries Limited (HIL/Hindalco/Organization)
Version	*Note: This Policy may be updated by the Company in its sole discretion, as and when required and shall be available on the Company’s online intranet portal/ website and may be made available through e-mail communication.
Applicable to:	<ol style="list-style-type: none"> 1. Employees, contract workers, interns, trainees, potential employee candidates 2. Contractors 3. Vendors <p>For the purpose of this Policy, collectively referred to as the “We”.</p>
Contact Details	<p>In case of any query, questions, grievance or for requesting any modification or deletion of personal information, please reach out at -</p> <p>Mail ID – hilinvestors@adityabirla.com Phone No. – 91 22 6691 7000 Address – Hindalco Industries Limited, 21st Floor, One Unity Center, Senapati Bapat Marg, Prabhadevi, Mumbai – 400013.</p>

In furtherance of its Sustainability Vision, HIL is committed towards, in alignment and accordance with the applicable laws¹:

- a. Protecting and supporting indigenous people (*which term shall be interpreted in accordance with applicable Indian laws and shall include “affected families / persons” as specified under The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013 (“Indigenous People”*)).
- b. Building effective relationships with Indigenous People that bring sustainable, social, ecological, and economic benefits to them as also our company, and the environment;
- c. Ensuring an equitable rehabilitation and resettlement of Indigenous People, when displacement becomes inevitable, and putting in place a standard operating procedures to achieve the same.

Thus, with the intent of providing understandable, effective, appropriate, and accessible measures to recognize, promote and protect the rights of Indigenous People, we hereby issue this ‘Rehabilitation,

¹ The term 'applicable laws' as used in this policy shall mean any statute, law, bye-laws, regulation, ordinance, protocols, codes, guidelines, policies, notices, directives, rule, judgment, order, decree or approval from the concerned government or statutory authority of India or other governmental restriction or any similar form of decision of, or determination by, or any interpretation or adjudication having the force of law of any of the foregoing of, by any concerned authority of India having jurisdiction over the matter in question and any modifications and re-enactment thereof in force from time to time.

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Resettlement and Protection of Indigenous People Policy of Hindalco Industries Limited' (hereinafter referred to as *Policy*).

Guiding Principles of our Policy:

The following seven principles are the guiding principles of our policy and are to be read and applied in accordance with the applicable laws, including any discussions, recommendations, agreements facilitated by concerned stakeholders.

A. Acknowledgement and Recognition of Rights:

1. We are committed to protect, uphold, recognise, and acknowledge the rights, culture, values and traditional knowledge of the Indigenous People.
2. We are committed to gain a full and detailed understanding of the impact of our historical, current and future operations on Indigenous People.

To this end, we are committed to

- a. Identify the local persons that would be potentially affected by our operations.
 - b. Carrying out a holistic assessment of all our project activities and preparing an engagement plan dealing with various aspects including principles of Free Prior Informed Consent (FPIC), Good Faith Negotiation, Informed Consultation, Informed Equal Participation of the affected Indigenous People;
 - c. Putting in place a binding agreement as a result of amicable discussions between the Indigenous People, HIL and other regulatory bodies, which captures applicable statutory requirements and such additional provisions as may be decided by HIL, , on a case to case basis.
3. We are committed to channelize our efforts, towards reduction of any disruptions that our future projects may cause to the life and livelihood of Indigenous People.

B. Responsiveness to the needs and expectation of Indigenous People:

4. Where impacts of our operations are identified, we are committed to ensure that interactions with Indigenous People are undertaken in good faith and in an open and equitable manner. To this end, we are committed to:
 - a. Identify instances, basis concrete evidence and through a comprehensive due diligence process, where our interactions with Indigenous People have justifiably fallen short of our commitment in the Policy;
 - b. Take immediate, corrective and comprehensive action to address any gaps in our approach;

C. Effectiveness and Accessibility of Protection

5. Where rehabilitation and resettlement of native residents is inevitable, we are committed to minimise the repercussions of such displacement by acknowledging and protecting the rights, culture and traditions of the region through a process facilitated by the statutory and regulatory authorities. To this end we are committed to:
 - a. Ensure that the resettlement is conducted in an effective, humane, collaborative, informed and transparent manner;
 - b. Ensure that the physical and economic needs of the Indigenous People that arise because of the displacement are acknowledged, recognised and catered for in the

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binding agreement concluded. We are committed to ensuring that these agreements include:

- Comprehensive, fair and detailed report on the status of all projects where interaction with Indigenous People have been held, including details relating to resettlements undertaken and compensations paid
 - Agreed action plan with timelines;
 - Mechanism for grievance redressal;
 - Evaluation and review of the resettlement project.
- c. Ensure that throughout the process, Indigenous People are informed and their Free Prior Informed Consent (FPIC) is obtained;
 - d. Ensure that appropriate compensation is timely awarded to the identified group of Indigenous People in accordance with the applicable law.
 - e. Explore all options of additional assistance for those who are physically or economically displaced, placing particular emphasis on any vulnerable groups;
 - f. Respond to the need for greater respect, recognition and protection of the vulnerable customs, cultures and traditions;
 - g. Ensure that Indigenous People have the means to access legal aid;
 - h. Ensure that, wherever feasible, the possibility of the Indigenous People returning to their land is explored;

D. Creating awareness of the rights and needs of Indigenous People

6. We are committed to
 - a. creating awareness of this Policy across our operations and our suppliers and business partners through various CSR and other initiatives.
 - b. educating our staff, employees and contractors about Indigenous People, their history, culture, knowledge and skills.
 - c. encouraging our employees, customers, vendors, suppliers and business partners whose attitudes and performance aligns with our aims and aspirations.

E. Concord with relevant international agreements and processes

7. We are committed to recognize and abide by our obligations, whether statutory (per the applicable laws) or voluntary (as elected by HIL), relating to Indigenous People.

F. Contribute to safeguarding knowledge and culture of Indigenous People

8. We are committed to
 - a. preserve, safeguard, protect traditional knowledge and culture of Indigenous Communities;
 - b. respect beliefs and values of Indigenous People
 - c. promote conservation, maintenance, application and wider use of such knowledge and culture.

G. Promote community development and legitimate trading activities

9. We are committed to

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- a. Promote innovation and transfer of information pertaining to the culture, skills and knowledge possessed by Indigenous People (referred to as '***Information***' here) for the mutual advantage of the holders and users of such Information.
- b. Promote equitable and fair distribution of benefits, monetary or otherwise, arising from use of such Information consistent with applicable laws.

10. We are committed to

- a. Provide fair and equal access to training, education, employment and business
- b. Promote the development of and the expansion of marketing opportunities for the use of such Information;

H. Repression of unfair practices

11. We are committed to curb:

- a. any removal of any Indigenous Peoples from their lands or territories by unauthorised use of force or coercion
- b. any forced assimilation or destruction of the culture of Indigenous Peoples;
- c. any discrimination against Indigenous Peoples by way of discriminatory conditions of labour and, inter alia, employment;
- d. Any misrepresentation of Information.

12. We are committed to adopt, practice and propagate a zero tolerance for unfair practices and encourage no-retaliation. To this end we are committed to:

- a. support and encourage reporting suspected non-compliances under this Policy as well as hazards, potential hazards, incidents involving health and safety or the environment.
- b. take every report seriously, investigate each report to identify facts, and effect improvements to our practices and procedures when warranted.
- c. offer good faith protection to all our complainants.² However, any intentionally false or malicious reporting would be actionable.

Administration and Enforcement:

1. We are committed to comply with all aspects of this Policy and support our partners and colleagues in doing so.
2. We are committed to (i) constitute a dedicated committee or (ii) identify certain key personnel to
 - a. Ensure compliance with the terms of this Policy and other applicable laws;
 - b. Entertain and adjudicate, wherever, expedient, such disputes that may arise owing to violation of the terms of this Policy.
 - c. Promote and propagate awareness regarding the contents of this Policy.