SUPPLY CHAIN DUE DILIGENCE REPORT - COPPER BUSINESS (DAHEJ) - 1 OCT 2025 TO 31 JUL 2026

HINDALCO INDUSTRIES LIMITED

JULY 31, 2026

HINDALCO INDUSTRIES LIMITED

Supply Chain Due Diligence Report

Copper Business - Dahej Facility

Reporting Period: 1 October 2025 - 31 July 2026

Prior Reporting Period: 1 Aug 2024 – 30 September 2026

Executive Summary

Hindalco Industries Limited (Hindalco) is committed to responsible mineral sourcing across its copper supply chain. This report (1 October 2025 - 31 July 2026), aligned with the OECD Due Diligence Guidance and informed by Copper Mark and LME expectations, summarizes how we identify, assess, and manage supply-chain risks, and documents the progress made during the period in the continued implementation of our due diligence management system for our copper manufacturing. It updates our last annual report (1 August 2024 - 30 September 2025) and supports the Copper Mark annual-publication.

During the period, we continued to act on the findings and learnings from our independent assurance against the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc (JDDS), using them as an opportunity to further strengthen our policies and practices. A follow-up assessment by a Copper Mark approved independent auditor confirmed that the site fully meets all applicable Copper Mark JDDS criteria. As part of our Policy and SOP, we continued to engage a third-party service provider to conduct desk-based due diligence on all our suppliers and logistics partners for this reporting period. The due diligence exercise included independent KYC checks and adverse-media monitoring across jurisdictions, so our assessments are not reliant solely on supplier-provided information but are corroborated by objective third-party sources and routed into corrective actions.

In parallel, we continued to invest in people and processes at scale, delivering responsible-sourcing and compliance training across core functions and beyond via our online learning platform. Where enhanced due diligence and our production-plausibility checks identified items requiring further verification, these are being managed through our engagement-first approach and time-bound corrective actions, and affected material is not treated as fully cleared until that verification is complete.

Snapshot of Results (for the reporting period : 1 October 2025 - 31 July 2026)

- 100% of the copper supply chain for Dahej Facility assessed for red flags and Annex II risks, including countries of origin, transport and transit, and all mining and logistics suppliers.
- 100% of our concerned suppliers screened by an independent third-party provider, continuing the annual practice and SOP.
- 18 countries of origin (including India) recorded for the period across the copper concentrate, anode/blister and ingot feed streams; 31 supplier engagements across those streams.
- No new substantiated Annex II finding was confirmed during this reporting period. Three sourcing / transit jurisdictions triggered a red flag under our Conflict-Affected and High-Risk Areas (CAHRA) determination

methodology - the Democratic Republic of the Congo, Tanzania and Zambia - consistent with the prior period. The flags did NOT constitute Annex-II Risks post evaluation.

- Enhanced due diligence and the production-plausibility test identified a small number of origin-integrity items, which were cleared only post further verification.
- ~11,835 employees, consultants and vendors enrolled in responsible-sourcing and compliance training via our online learning platform; ~67% of assigned courses completed as at 1 January 2026, with the balance in progress, an assessment pass rate above 98%, and over 98% of required policy undertakings signed.
- No supply-chain grievances received during the reporting period.
- An independent Copper Mark follow-up assessment completed during the period confirmed that Birla Copper fully meets all applicable JDDS criteria, with all five due-diligence criteria rated ‘Fully Meets’.

A. Introduction

1. About this Report

At Hindalco Industries Limited, we reaffirm our commitment to respecting human rights, preventing conflict financing, and promoting responsible sourcing in our supply chains. This report has been prepared in accordance with Step 5 of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance) and is informed by the disclosure requirements of the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc (JDDS) and the London Metal Exchange (LME). It provides an overview of our policies, governance structures, and due diligence management system, and documents our due diligence implementation and performance, including lessons learned, outcomes achieved, and continuous improvement actions undertaken during the period 1 October 2025 - 31 July 2026.

2. Scope of the Report

The reporting period spans 1 October 2025 - 31 July 2026.

This Report covers Hindalco’s Copper Unit at Dahej, Gujarat, and its upstream suppliers of copper concentrate, copper anode, blister feed, and (domestically procured) copper ingots. Copper cathode is produced at the Dahej facility and was not externally sourced during the period.

B. Company Information

Hindalco Industries Limited is the metals flagship company of the Aditya Birla Group. Established in 1958, Hindalco is today an industry leader in aluminium and copper, operating 47 units in 10 countries and including a workforce of nearly 40,000 people from diverse nationalities. Hindalco’s Copper Unit, located at Dahej, Gujarat, features two smelters, two refineries, two rod plants, and supporting infrastructure including a captive jetty, a captive power and oxygen plant, a precious metal recovery plant, and associated utilities. Our product portfolio includes LME-grade copper cathodes, continuous cast copper rods, gold and silver. Installed production capacity is 0.42 million MT (420 KT) for copper cathodes and 0.54 million MT (540 KT) for copper continuous cast rods.

C. Five-Step Due Diligence Framework

Hindalco operates a documented due diligence management system grounded in our policy framework and articulated through standard operating procedures (SOPs). The management system is endorsed by senior management and integrated into the day-to-day operations of the relevant departments, as described in the following sections. The management system is reviewed on an annual basis and when changes in circumstances occur, with a view to continuous improvement.

Step 1: Establish Strong Management Systems

1.1 Policy Framework and Commitments

Hindalco maintains a multi-layered, board-endorsed policy architecture that establishes global minimum standards for responsible sourcing, sanctions and trade compliance, applied across the value chain. The framework is built upon interlocking policies - principally the Human Rights Policy, the Responsible Supply Chain Policy and the Supplier Code of Conduct - which together underpin our approach to ethical governance, safeguarding stakeholder interests, and driving sustainable value creation across our copper supply chain.

Policy	Scope & Key Commitments
Responsible Supply Chain Policy	Formalises Hindalco's adherence to the OECD five-step due diligence framework. Covers Annex II risks including forced labour, child labour, conflict financing, bribery, money laundering, and non-payment of government dues. Publicly available on Hindalco's website.
Human Rights Policy	Conforms to the UN Universal Declaration of Human Rights and ILO core principles. Prohibits trafficking, child labour, forced labour and discrimination.
Code of Conduct & Supplier Code of Conduct	Binding on all employees and vendors. Embedded in onboarding, purchase orders and contracts. Covers human rights, labour practices, health and safety, environmental standards and statutory compliance.
Sanctions Policy	Mandates screening of all counterparties against U.S. OFAC, EU Consolidated, UN and other applicable watchlists. Prohibits direct and indirect dealings with sanctioned persons, entities and jurisdictions. Requires UBO identification and event-driven re-screening.-
Anti-Money Laundering, Anti-Bribery & Anti-Corruption Policy	Sets ethical conduct standards. Prohibits facilitation payments, bribery and engagement in money laundering. Aligns with India's Prevention of Corruption Act, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.
Export Control & SCOMET Compliance	Governs imports and exports of dual-use goods, controlled technology (SCOMET categories 0-8) and software under India's FTDR Act and DGFT regulations. Requires pre-import/export classification and licensing.
Enterprise Risk Management Policy	Holistic risk framework overseen by the Chief Risk Officer. Encompasses sanctions, geopolitical, supply chain, financial and operational risks with quarterly mitigation reviews.
Competition Policy	Governs anti-competitive conduct, including prohibitions on cartelisation, abuse of dominance, bid rigging and information exchange, with protocols for interactions with competitors, trade associations and customers, in line with the Competition Act, 2002.

1.2 Governance and Organisational Structure

Responsible sourcing, sanctions and trade compliance are embedded into Hindalco's corporate governance rather than operating as standalone legal controls. Oversight flows from the Board to the Managing Director and through a cross-functional structure:

- **Sustainability Board (chaired by the Managing Director):** sets strategic direction for compliance, responsible sourcing and ESG commitments.
- **Chief Risk Officer (President level):** oversees the Enterprise Risk Management framework, including sanctions and trade risk, across all business units.
- **Compliance Head (General Manager):** responsible for implementing compliance-related requirements across all mines and manufacturing units.
- **Legal & Compliance function:** reviews counterparty KYC/UBO against national and international sanctions lists; approves or rejects high-risk transactions following enhanced due diligence.
- **Procurement team:** conducts Know Your Counterparty (KYC) screening at onboarding and periodically thereafter; leads supply chain information collection and record-keeping for a minimum of five years.
- **Operations department:** identifies supply chain (countries of origin, transit countries) red flags annually; triggers CAHRA determinations and escalates for enhanced due diligence.
- **Independent financial institution oversight:** Hindalco's banking partners independently apply their own AML, CFT and KYC/UBO screening standards, providing a parallel layer of transaction monitoring.

Risk classification follows a Low / Medium / High framework based on jurisdiction, counterparty profile, product sensitivity, ownership complexity and end-use. High-risk transactions require Legal & Compliance clearance before commitment.

---Oversight of the supply-chain due diligence management system is provided by the Board-level Sustainability Committee, which reviews due-diligence KPIs and material risk decisions on a quarterly basis. Day-to-day implementation is led by a cross-functional team spanning Procurement (process owner), Operations, Finance, Legal, Enterprise Risk Management (ERM) and Sustainability, with defined escalation paths to report red flags and supply-chain risks to senior management. Accountability and responsibility are set out in a formal organogram and RACI matrix, as follows:

Activity	ERM	Legal	Finance	Operations	Procurement
1. Data collection & record-keeping	I	C/I	-	R	R
2. KYC	A	I	C/I	R	R
3. Red-flag identification & CAHRA	A	I	C/I	R	R
4. Enhanced due diligence & field audits	C/I	A	C/I	R	R
5. Risk management	A	A	C/I	R	R
6. Reporting	R	A	I	R	I
7. Review, update & training	R	I	I	R	R

(R = Responsible, A = Accountable, C = Consulted, I = Informed)

1.3 Screening and Due Diligence Controls

All counterparties - customers, suppliers, distributors and agents - are screened at onboarding, periodically, and on an event-driven basis. Screening covers the OFAC SDN List, the EU Consolidated List, UN sanctions lists and relevant national watchlists; beneficial ownership mapping to identify Ultimate Beneficial Owners with sanctions exposure; and adverse media, litigation, regulatory action and high-risk jurisdiction indicators via subscribed compliance databases. Re-screening is triggered by regime change, by ownership or control changes in the counterparty, and by evolution of the supply relationship or end-use.

1.4 Due Diligence Standard Operating Procedure

To support due diligence implementation, Hindalco maintains a formal Due Diligence Standard Operating Procedure (SOP), effective 28 June 2024, which defines governance, workflows and documentation requirements in alignment with the five-step framework of the OECD Due Diligence Guidance. The SOP applies across metallurgical operations (including the Dahej Copper Unit) and describes the company's approach to conducting KYC, red-flag review and CAHRA determination, enhanced due diligence, and risk management, as described under Step 2 and Step 3 of this Report. The SOP is reviewed annually to incorporate regulatory updates and lessons learned.

1.5 Internal Controls and Traceability

Hindalco maintains internal controls and traceability processes to collect, review and retain the information needed to map our supply chains and undertake due diligence. At onboarding, all vendors complete a questionnaire covering compliance, financial, environmental, social and governance parameters. On an annual basis, suppliers also complete a Know Your Counterparty (KYC) and Due Diligence Questionnaire, through which we collect the information needed for red-flag review. For international shipments, suppliers provide Certificates of Origin, mine-issued certificates of analysis, and transportation documentation (Bills of Lading and customs export/import records); domestic logistics were managed via Indian Railways and approved road carriers. Sites maintain transaction-level documentation, delivery notes, e-permits and mass-balance reconciliation, with records retained for a minimum of five years. The data generated by these controls feed directly into the red-flag identification and risk-assessment process described under Step 2.

1.6 Training and Awareness

All new employees complete a mandatory compliance course covering the Code of Conduct, AML/ABAC, sanctions and the POSH Act, with completion certified. Procurement-specific training covers sanctions categories, secondary sanctions exposure, SCOMET and dual-use goods classification, end-use and end-user certification requirements, and red-flag identification. Training on global trade compliance and ethics awareness addresses export controls, sanctions, LME compliance, AML/ABAC and CAHRA due diligence through scenario-based case studies. Vendor contracts and purchase orders include explicit references to the Code of Conduct and Supplier Code of Conduct, imposing binding compliance obligations.

During the reporting period, Hindalco continued to deliver responsible-sourcing and compliance training to employees, consultants and vendors via our online learning platform. Approximately 11,835 personnel were enrolled across business units. As at 1 January 2026, about 67% of the assigned courses had been completed, with the balance in progress toward completion by the end of the financial year. Of the personnel completing the certification assessment, over 98% passed, and over 98% of required policy undertakings were signed. All trainees are required to take a final test, to ensure our due diligence system is well understood.

1.7 Contractual Safeguards

Clause type	Description
Representations & warranties	Suppliers certify accurate export-control classification, no sourcing from denial or embargo-listed entities, no sanctioned UBO affiliation, and compliance with applicable AML/ABAC laws. Reaffirmation required at onboarding, annually, and on material change.
Non-diversion covenants	Binding undertakings prohibiting re-export, diversion or transfer to restricted jurisdictions or end-users without prior authorisation, supported by purpose-limitation clauses in end-use declarations.
Audit & access rights	Hindalco retains the right to conduct on-site or virtual audits of supplier records, with access to relevant subcontractor documentation. Annual audits for high-risk suppliers; biennial for moderate-risk.
Purchase-order hold & suspension	Automatic purchase-order hold upon suspected non-compliance. The supplier must remediate within 30 days or Hindalco may terminate without penalty.
Termination rights	Immediate termination rights for material export-control or sanctions breaches posing regulatory or reputational risk, without penalty to Hindalco.
Indemnification	Suppliers indemnify Hindalco for fines, penalties, legal costs and reputational remediation costs arising from supplier non-compliance.
Periodic re-certification	Suppliers self-certify compliance on a quarterly or semi-annual basis, aligned with Hindalco's Vendor Due Diligence platform updates.

1.8 Grievance Mechanism and Whistleblower Framework

Hindalco operates a formal grievance mechanism to receive, assess and resolve concerns related to responsible sourcing and human rights across our copper supply chain. The mechanism is accessible to all employees, suppliers and stakeholders via a toll-free hotline, email and a web portal. Full anonymity and confidentiality are protected under the Whistleblower Policy and the identity of an informant is never disclosed. Each complaint is assigned a case manager with a defined investigation process and service-level agreement, maintained via a central team and a dedicated software platform with access controls, and a management information system tracks all grievances and their resolution for audit and governance purposes. The mechanism is integrated into the Code of Conduct, supplier contracts and all training programmes, and is publicised through regular communications and notices at all premises. During the reporting period, Hindalco received no supply-chain grievances.

Step 2: Identify and Assess Risk

2.1 KYC, Red Flags Identification[1] and CAHRA Determination

Hindalco conducts KYC and collects the information needed to identify red flags through a Know Your Counterparty (KYC) and Due Diligence Questionnaire, capturing suppliers' identity, the nature and legality of their business operations, their owners and beneficial owners, and information on material origin and transport / transit. The red-flags review is based primarily on an assessment of whether sourcing, transport and/or transit countries qualify as Conflict-Affected and High-Risk Areas (CAHRAs) using recognised sources: the Dodd-Frank

[1] Red flags are warning signs or geographic/supplier triggers that demand deeper investigation, whereas Annex II risks are the actual severe social and governance harms (such as human rights abuses or conflict financing) that companies must evaluate and mitigate.

Act Section 1502; the EU indicative CAHRA list; and the TDi Sustainability CAHRA Index. A country qualifies as a CAHRA if it is covered by Dodd-Frank Section 1502 (the DRC and adjoining countries), and/or appears on the EU indicative CAHRA list, and/or is rated ‘High risk’ (red) on the TDi CAHRA Index. Where relevant, a regional (sub-national) assessment is conducted. In addition, Hindalco conducts a plausibility assessment to verify that the declared sourcing country is consistent with that country’s reserves and production volumes.

During the reporting period, Hindalco’s copper unit sourced material originating in Australia, Botswana, Brazil, Canada, Chile, the Democratic Republic of the Congo (DRC), India, Indonesia, Mexico, Namibia, Papua New Guinea, Peru, Saudi Arabia, Serbia, Spain, Sweden, Tanzania and Zambia. Seaborne consignments of anode and blister feed were transported and transhipped through Dar es Salaam (Tanzania), Walvis Bay (Namibia) and Durban (South Africa). Based on Hindalco’s CAHRA determination methodology, three of these jurisdictions qualified as CAHRA - the Democratic Republic of the Congo, Tanzania and Zambia - thus triggering a red flag (not constituting Annex II findings). The flags included vessel and logistics observations and the labour, environmental and health-and-safety matters flagged at certain upstream sites – these observations were addressed separately through continuous supplier engagement with shipments proceeding in those cases where the review of supplier responses and supporting documentary evidence supported that decision.

We formally engaged with the Suppliers to apprise them of Hindalco’s Responsible Sourcing commitments (including from his supply chain partners), obtaining targeted responses on the issues highlighted through the independent verification conducted by Third party service provider. As a result of the continuous engagement with them, a binding commitment from the Suppliers to adhere to responsible sourcing standards aligned with LME and OECD expectations was obtained. The same is documented and an amendment to the ongoing contracts and assurance of inclusion in the new contacts. For DRC: We wanted to acknowledge that CAHRA/geographic and transit risk factors are likely at DRC (origin in or transit through a CAHRA jurisdiction). This was a procedural escalation as per the SOP but not equivalent to finding a non-compliance in the Supplier's processes.
Given the sourcing origin and transit geography, Hindalco commissioned EDD to: (i) validate the provenance of the material, (ii) verify chain-of-custody and transport documentation, (iii) screen counter-parties against sanctions/PEP/denial lists, and (iv) conduct targeted verification where relevant. The EDD identified no material adverse indicators under OECD standards. However, it was decided by the management that we will annually monitor the supply and ring-fence the company by including contractual safeguards. Those recommendations have been adopted by Hindalco Procurement/Compliance.
We therefore recorded:
(a) Annex II was triggered as per the SOP logic;
(b) the ensuing EDD was completed and concluded with no material adverse findings; and
(c) additional verification activity (Deloitte) was documented in the tool logs and contractual clauses adopted.

2.2 Application of the Red-Flag Assessment Methodology

Consistent with our Responsible Supply Chain Policy (effective 28 June 2024) and our Due Diligence Standard Operating Procedure, and in line with the five-step framework of the OECD Due Diligence Guidance and the JDDS, Hindalco applied a structured, tiered red-flag assessment to its suppliers and supply chains during the period. First, KYC and Due Diligence Questionnaires were collected and reviewed to capture each counterparty’s identity, beneficial ownership, and the origin, transport and transit of the material supplied. Second, a red-flags review and CAHRA determination were performed for every sourcing, transport and transit jurisdiction using the recognised sources set out above, and documented in Hindalco’s Red Flags Identification and CAHRA Determination Tool. Third, a production-volume plausibility assessment was carried out, testing the tonnage recorded from each mine of origin against that mine’s published output, so that any implausible origin attribution is surfaced as a red flag for verification. Where a red flag was present - including material originating in or transiting a CAHRA - Hindalco conducted enhanced due diligence using its Enhanced Due Diligence and On-the-Ground Assessment Tool, which draws on the JDDS 'Information Collection for Risk Assessment' expectations and the OECD 'Guiding Note for Upstream Company Risk Assessment'. The desk-based enhanced due diligence examined, among other matters, the counterparty's adherence to international responsible-sourcing frameworks and its Annex II policies, the exact mine of origin and in-country transport routes, the governance and security context of the area of origin and transit, and evidence of any payments to government, security forces or armed groups, with the objective of confirming the presence or absence of OECD Annex II risks. On-the-ground assessment is reserved for cases in which the desk-based review and our defined criteria indicated it was warranted. The methodology, its tools and its outputs - KYC and due diligence questionnaires, CAHRA determinations, plausibility analyses and enhanced-due-diligence assessments - were retained as records and made available for independent third-party assurance against the JDDS.

2.3 Enhanced Due Diligence and Supplier Engagement

For red-flagged supply chains, Hindalco collects additional information to conduct a desk-based assessment of the factual circumstances of extraction, transport, trade, handling, processing and export, via an Enhanced Due Diligence Questionnaire and, where appropriate, on-the-ground verification or recognition of credible third-party audits. During the period, Hindalco engaged an independent service provider to conduct a desk-based due diligence screening of all suppliers and logistics counterparties - including but not limited to those triggering a red flag - comprising screening of suppliers and their beneficial owners against sanctions and watchlists, and assessment of adverse-media reports to detect OECD Annex II risks, using subscribed compliance databases, public sources and media.

In addition to desk-based due diligence through a third-party provider, Hindalco engaged directly with red-flagged suppliers to collect information on the strength of their due diligence systems. In most cases, Hindalco was able to establish that the suppliers are large-scale mining companies participating in the Copper Mark or other relevant due diligence assurance frameworks, thereby mitigating the risk that supply-chain risks remain uncontrolled.

For the balance of cases, we engaged repeatedly with the suppliers concerned - both one-to-one and through focused group sessions - to make them aware of our responsible sourcing commitments and to seek their formal assurance and binding commitment to observe them. These efforts have been consistent, and the outcomes vary. With some suppliers we secured undertakings or contract amendments, including the inclusion of sanctions, AML and anti-bribery clauses; others provided commitment in the form of their Copper Mark certificates or BRSR reporting, or reliance on existing contractual clauses. We have adopted an approach of continuous engagement and substance over form: where suppliers did not accept the exact form or wording proposed, we encouraged dialogue in order to reach a mutually acceptable resolution.

As a result of enhanced due diligence, including a review of information submitted by suppliers and the external third-party assessment, a number of improvement areas were identified which did not constitute new Annex II findings:

- For vessels and logistics, some entries showed adverse-media reports linked to failure to comply with maritime regulations; the affected vessels were held until the necessary corrective actions were taken to meet the required safety, environmental and operational standards.
- For mining entities, the media review flagged labour, environmental, and health-and-safety related issues at certain upstream sites.

- The production-plausibility test identified a small number of origin-integrity items where the declared mine-of-origin requires further verification; these items are under investigation, and the associated material is not treated as cleared pending that verification.
- Certain higher-risk sources have not been treated as cleared and are managed on a restricted basis pending completion of enhanced due diligence, including forced-labour (UFLPA), chain-of-custody and independent third-party audit verification.

Step 3: Design and Implement Risk Management Actions

Where risks are identified, Hindalco applies an engagement-first approach and agrees a time-bound Corrective Action Plan with the supplier, defining milestones, responsibilities and verification methods. In line with our policies and SOP, immediate suspension or disengagement is applied where there is a reasonable risk of serious human-rights abuses or direct or indirect support to non-state armed groups. Suspension or disengagement is applied also where mitigation fails after reasonable timelines (six months) in cases involving bribery, money-laundering, fraudulent origin claims, or non-payment of taxes, fees or royalties.

During this reporting period, no new substantiated Annex II risk was identified.

Step 4: Conduct Independent Third-Party Audit

Hindalco's Copper Unit (Birla Copper, Dahej) participates in the Copper Mark assurance process against the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc (JDDS). An initial independent assessment in 2024 identified a number of areas for improvement, in response to which Hindalco implemented a time-bound corrective-action plan.

During this reporting period, an independent Copper Mark follow-up assessment was conducted from 17 to 21 November 2025 by an accredited independent assessment firm. The follow-up assessment confirmed that the site fully meets all applicable JDDS criteria, with all five due-diligence criteria rated 'Fully Meets':

- Due Diligence Management System: Fully Meets
- Risk Identification: Fully Meets
- Risk Assessment: Fully Meets
- Risk Management: Fully Meets
- Public Reporting: Fully Meets

The Copper Mark Statement of Conformance records that 'the site is found to fully meet all applicable criteria'. This outcome, an improvement on the initial assessment, evidences the effectiveness of the corrective actions taken and of our due diligence management system. The assessment report is publicly available on the Copper Mark website.

In addition, as an LME-listed brand, Hindalco submits an annual Red Flag Assessment template in accordance with the LME Policy on Responsible Sourcing, based on the OECD Due Diligence Guidance, covering supply chain information, management systems, red flag identification, CAHRA determination and grievance mechanisms. Vendor due diligence is also conducted via an external specialist platform covering corporate records and UBO analysis, sanctions and enforcement database screening, adverse media, litigation and regulatory actions, and credit default history, with each vendor scored and risk-rated and with periodic mitigation reviews for high-risk vendors. Hindalco maintains ISO 14001:2015 (Environmental Management), ISO 45001:2018

(Occupational Health & Safety) and ISO 9001:2015 (Quality Management) certifications across its mines, manufacturing units and offices.

Step 5: Report on Due Diligence and Performance

This report constitutes Hindalco's Step 5 due diligence disclosure for the period 1 October 2025 - 31 July 2026, aligned with the OECD Due Diligence Guidance and informed by Copper Mark JDDS and LME expectations. It sets out our management systems, the risk-assessment methodology and findings, risk-management actions and their effectiveness, stakeholder involvement, and priorities for continuous improvement. It also discloses capacity-building and training provided in the last 12 months. The report is publicly available on the company's website at Investor Centre > Policies.

D. Key Performance Indicators and Targets

KPI	Target (2025-26)	Actual (this period)
Personnel enrolled in training (n.)	~11,835	~11,835 enrolled; ~67% of assigned courses completed (Jan 2026)
Training assessment pass rate (%)	100%	>98% of those attempting
Policy undertakings signed (%)	100%	>98%
Grievances received (n.)	n/a	0
Grievances resolved (%)	100%	100% (none received requiring resolution)
Suppliers / vendors assessed for red flags (%)	100%	100%
Suppliers screened by an independent third-party provider (%)	100%	100%
Countries of origin (n.)	-	18
Supplier engagements across material streams (n.)	-	31
Red-flag jurisdictions identified (n.)	-	3 (DRC, Tanzania, Zambia)
New substantiated Annex II risks identified (n.)	0	0
Copper Mark JDDS conformance (follow-up assessment)	Fully meets	Fully meets all applicable criteria (Nov 2025)

E. Feedback

Any comments, questions or grievances related to the topics covered in this report may be addressed via Hindalco's grievance mechanism (toll-free hotline, email and web portal). Confidentiality and the anonymity of informants are protected under our Whistleblower Policy.

F. Challenges and Limitations

Hindalco acknowledges the following constraints that affect due-diligence implementation and disclosure:

- **Data gaps and visibility:** limited visibility beyond first-tier suppliers in certain chains; language barriers in some regions can affect document review and outreach.
- **Resource and implementation constraints:** budget limitations for field audits necessitate a risk-based approach to on-site verification; traceability IT integration is in progress and will be completed in phases.

These priorities are being carried forward under our continuous-improvement plan, alongside completion of certified sanctions and PEP screening, strengthening of lot-level chain-of-custody for red-flag origins, completion of the production-plausibility analysis on a single controlled master data set for the full reporting period, and consolidation of a single supplier screening register.

Glossary of Terms

Term / Acronym	Definition
Annex II Risks	Risks listed under Annex II of the OECD Due Diligence Guidance, including serious human-rights violations, support to armed groups, bribery, money laundering and tax evasion.
CAHRA	Conflict-Affected and High-Risk Area - a country or region identified to be at heightened risk of conflict or human-rights abuses.
CAP	Corrective Action Plan - a structured remediation plan developed to address audit findings or identified risks.
CoO	Certificate of Origin - a document declaring the origin of the goods being traded.
Copper Mark	A voluntary assurance framework for responsible copper production and sourcing aligned with OECD Guidance.
Due Diligence SOP	Standard Operating Procedure that outlines Hindalco's internal process for responsible supply-chain due diligence.
EDD	Enhanced Due Diligence - additional scrutiny conducted for high-risk suppliers or CAHRA-linked entities.
ESG	Environmental, Social and Governance - a framework used to evaluate a supplier's sustainability and ethical impact.
JDDS	Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel and Zinc - recognised by the LME and aligned with OECD Guidance.
KYC	Know Your Counterparty - a process of verifying the identity and risk profile of suppliers or customers.
LME	London Metal Exchange - the global centre for trading industrial metals.
OECD DD Guidance	The OECD framework for responsible sourcing from conflict-affected and high-risk areas, followed globally by mineral and metal supply chains.
Red Flag	A risk indicator or warning sign that triggers further due diligence (for example, sourcing from a high-risk geography).
SOP	Standard Operating Procedure - an internal protocol describing roles, workflows and responsibilities for operational processes.
Supplier Code of Conduct	A binding policy document setting out Hindalco's expectations of suppliers on human rights, environment, compliance and ethics.
Third-Party Audit	An independent review of Hindalco's supply-chain due diligence practices conducted by an external assurance provider.
Traceability	The ability to track the source, processing and movement of materials throughout the supply chain.
UBO	Ultimate Beneficial Owner - the natural person who ultimately owns or controls a counterparty.
UFLPA	Uyghur Forced Labor Prevention Act - US legislation addressing forced-labour risk in supply chains, applied within enhanced due diligence.
Whistleblower Policy	Hindalco's internal mechanism enabling stakeholders to report unethical conduct anonymously and without fear of retaliation.