

HUMAN RIGHTS POLICY

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HUMAN RIGHTS POLICY

Hindalco recognises the valuable role that our business can play in protection of human rights. We are committed to respect the human rights of our workforce and the communities around our operations. In line with the UN Guiding principles on Business and Human rights, ILO's declaration on fundamental principles and rights at work, and other internationally accepted standards, our commitment encompasses respecting human rights and seeking to avoid involvement in human rights violations, by identifying, assessing and minimising potential adverse impacts through due diligence and resolving issues & grievances of stakeholders such as employees, local communities and indigenous people surrounding the units, migrant labour and contractual labour, effectively.

We endeavour to achieve our commitment by:

- Maintaining positive legal compliance to applicable regulatory human rights requirements in-line with Hindalco Management Framework (HMF).
- Valuing diversity, equal opportunity and equal remuneration.
- Adhering to the statutory regulation w.r.t. payment of wages that either meet or exceed the
 minimum standard of living and, where such laws are absent, determining the remuneration to
 maintain the living requirements based on industry standards, regional cost of living etc. Annual
 reviews will ensure continued alignment with evolving economic conditions, cost of living indices
 and industry best practices in determining a living wage.
- Preventing harmful conditions, human trafficking, child labour, forced labour, modern slavery, discrimination and harassment in our operations.
- Prohibiting any contribution to armed conflict or human rights abuses.
- Protecting the data confidentiality of employees and that of customers and suppliers.
- Promoting awareness of human rights among employees through training and communication.
- Providing access to remedy by resolving grievances in a timely and culturally appropriate manner.
 Hindalco has a Vigil Mechanism and Whistle Blower Policy, under which employees are free to report violations of applicable laws and regulations and Code of Conduct.
- Prohibiting interference in any way with the establishment, functioning or administration of workers' organisations.
- Respect the right of all workers to form and join a trade union of their choice and participate in collective bargaining without fear of intimidation or reprisal, in accordance with national law.
- Undertaking an iterative due diligence process, aimed at identifying, assessing and managing
 potential human rights related risks and impacts in areas of our control through Hindalco's
 Human Rights Assessment Framework checklist and integrating the same in the company's
 comprehensive Enterprise risk management framework, monitoring Human Rights risks to
 Hindalco on a regular basis.
- Aligning our existing processes and activities with out commitment to respect human rights, as applicable to areas including labour practises, engagement with Indigenous people, in land acquisitions, supply chain and security management.
- Remediation of adverse human rights impacts through legitimate processes.



- Engaging with stakeholders in an inclusive, transparent and culturally appropriate manner on human rights concerns related to our business activities.
- Influencing our contractors, suppliers and other organisations with whom Hindalco has a leverage to align with our commitment to human rights protection.
- Establishing measures to review the impact of actions taken for Human Rights preservation.

This policy shall be made available to all employees, suppliers, customers, authorized business partners, Community and other stakeholders, as appropriate.

for Hindalco Industries Limited

Satish Pai Managing Director



GUIDELINES TO THE HUMAN RIGHTS POLICY

As a global corporate with operations across the world, Hindalco Industries Limited ("**Hindalco**") recognizes the valuable role that the business can play in protection of human rights. Our position on human rights is clearly defined in policy and we undertake compliance with the said principles. We rely on trust-based business relationships, with appropriate monitoring built in, which enrich lives.

We are committed to respect the human rights of our workforce, our suppliers, customers, and the communities around our operations. Hence, this policy applies not just to our entire workforce, including employees (temporary, permanent, apprentice), contractors, but also to our suppliers, customers, and business partners as also to the communities we support. Should national or State laws conflict with the individual principles of this policy, we seek to apply the highest possible priority to human rights within the legal framework of India.

Hindalco's Supplier Code of Conduct lays the foundation for supplier relationships, setting out basic principles and standards to be observed, and requirements for sustainability. It is an integral part of our terms and conditions for new suppliers. The Supplier Code of Conduct and the General Terms and Conditions of the business require suppliers to commit to protecting human rights. They are also expected to require the same, within reason, from their own subcontractors.

We strive to be impactful and build meaningful relationships by engaging with our customers and investing in communities to promote sustainable development. Our commitment to uphold human rights is reflected in the way we run our operations, our policies, and operating procedures, as well as goals and roadmaps. Our business activities take into consideration the health and livelihood of local communities and indigenous peoples and we are guided by our Rehabilitation, Resettlement, and Protection of Indigenous People Policy.

We endeavor to achieve our commitment by:

- 1. Maintaining positive legal compliance to applicable regulatory human rights requirements inline with Hindalco Management Framework (HMF), which is marked and annexed hereto as Annexure A.
- 2. Valuing diversity, equal opportunity and equal remuneration: Hindalco takes pride in its culturally and geographically diverse workforce, which we believe is a tremendous asset in generation of ideas, perspectives and values.

We actively promote an open and inclusive work culture, and all employees are responsible for treating each other with dignity and respect. Employment at Hindalco is done with utmost transparency and based on meritocracy. All legal procedures are followed during the hiring process. Employees are provided with employment contracts which comprise governing terms and conditions of their employment including without limitation, and as the case may be, full name, address, and photograph of the employee, identification number and proof along with



document number, emergency contact information, blood group, summary of wages and emoluments - statutory and otherwise, insurance/healthcare benefits, term of employment, working hours and related entitlements, other benefits and rewards, termination triggers and consequences. Employees are also made aware of all company policies through inductions and training and provided access to the same digitally or physically. Employees at Hindalco receive equal pay for equal work. Hindalco offers its employees competitive, performance-based compensation, supplemented with additional benefits in line with applicable laws and company policies while ensuring that its workforce, whether workmen, contract hires or badli workers/substitutes, temporary employees are paid at least the statutory minimum wage.

- 3. Cost of Living: Hindalco is committed to paying wages that meet or exceed the minimum requirements of applicable State or Central laws, where such laws exist. In areas where minimum wage laws are not defined or applicable, we will commit to a benchmarking study based on industry standards, regional cost of living, and consultations. Given the diverse and evolving economic conditions, cost of living indices across the expanse of India, wage structures will be periodically reviewed on annual basis to reflect upon local living costs, including housing, food, healthcare, education, and transportation. If any discrepancies in wages due to regional variations are identified, which are determined to be addressed as per law or company policies, we will endeavor to address them through equitable adjustments, ensuring fairness across our operations. Adjustments will be made as necessary to maintain our commitment to a fair and dignified standard of living for all employees.
- 4. Working hours management: Hindalco's working time principles take into account both operational and individual concerns. We view working hours as a key element of employer attractiveness. We are guided by the ILO Core Labor Standards and comply with applicable statutory working time regulations taking into account aspects such as daily working hours, rest time/ breaks, weekly working hours, weekly offs, shifts and shift changes, seasonal duties and time changes, public holidays, granted or paid leaves (Leaves applicable as per state regulations including Annual Leaves), emergency situations, shutdowns. Across States in India, where we have our operations, we have designed appropriate working time regulations and shift arrangements, defining maximum working hours as per respective state regulations, and we track the working hours to ensure adherence to applicable regulations and to avoid excessive working hours. All employees are entitled to holidays and paid leave as per the applicable laws. Overtime, if any, is voluntary and the wages are paid as per applicable laws. To achieve compliance with applicable laws, proper documentation and registers in the form of attendance musters, biometrics, leave registers, payroll sheets, etc. are always maintained. We train our staff in recordal and maintenance of these critical documents in a transparent and responsible manner.



- 5. Fostering health and occupational safety: Protecting the health and safety of our workforce and their well-being is of paramount importance to Hindalco. We strictly comply with all applicable occupational health and safety laws as well as our own company policies. We also apply ISO certification standards, such as ISO 45001, in our operations to improve occupational health and safety. While ensuring the safety and security of our workforce as well as our supply chain, we also remain guided by applicable international laws.
- 6. Providing freedom of association and collective bargaining, and prohibiting interference in any way with the establishment, functioning or administration of workers' organizations: In accordance with the Industrial Disputes Act, 1947, Trade Unions Act, 1946 and other applicable laws, we recognize and respect the right of employees/ workers to form and/or join organization/ trade unions of their choice and participate in collective bargaining to negotiate working conditions without fear of intimidation or reprisal. No worker is subjected to dismissal, discrimination, harassment, blacklisting or any unfair employee decision on account of such worker's affiliation to trade unions or participating in any lawful unionized activities or demonstrations or raising issues to the company. Hindalco fosters a culture founded on trust and constructive cooperation with respective employee representatives. Even when there are different perspectives, the aim is to maintain a good working relationship through dialogue in the interest of the company and its employees and engage in good faith discussions. We honor the term of any collective bargaining agreement that has been signed post a mutual agreement, and copies of such agreement are provided to the workers concerned. At locations without employee representation, we promote regular consultation between the workforce and the company. No union membership fees are deducted from the wages unless agreed otherwise.
- 7. Preventing harmful conditions, human trafficking, child labour, forced labour: The Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 and the Bonded Labour System (Abolition) Act, 1976 prohibits and restricts child labour and abolished bonded labour in India. In accordance with the laws and ILO standards, we prohibit forced, bonded, indentured, underage or prison labor in any form. This also includes all forms of modern slavery and human trafficking. Any form of threat, coercion, physical punishment, or abuse used to compel work is strictly prohibited. We do not confiscate or withhold originals of any identification documents, passports, or work permits of any employee/ workman. All employment contracts are entered into on a voluntary basis, without deposit of money, and can be terminated without penalties in accordance with applicable laws and by providing reasonable notice, as may be applicable. Employees/ workers are not confined/ restricted to moving inside the facility except where necessary for safety and restricted by applicable laws.

In accordance with the applicable Indian laws and in consonance with ILO Core Labor Standards, we adhere to minimum employment ages as per applicable laws and categorically reject employment of any individual below the age of 18 years except as permitted under special statutes. To achieve this, we ensure that any of the following documents verify the age (certified copies of birth certificates, school leaving certificates, government-issued IDs, duly notarized



affidavits from competent authority, working permit issued by an authorized agency of a foreign Country) is collected from all our employees/ workers and the same is verified prior to hiring. As part of our standard hiring practices, we also carry out background verification of all candidates including age verification. The confirmation of employment is subject to satisfactory verification of reports. We also keep a vigil to conduct periodic and random screenings for any potential underage workers. In case of finding any such underage worker, we ensure the worker's safety and subsequently ensure that he is taken out of the work premises of Hindalco after apprising him of the context and without any undue use of power, threat or retaliation.

- 8. Notice period in case of Retrenchment and Layoff: In the event that a layoff or retrenchment becomes necessary, the same shall be carried out in strict compliance with the provisions of the Industrial Disputes Act, 1947. The applicable minimum notice period one month under Section 25F or three months with prior government approval under Section 25N along with statutory compensation, shall be duly adhered to.
- 9. Prohibiting any contribution to armed conflict or human rights abuses: Hindalco does not support armed conflict in any form and has adopted Responsible Supply Chain Policy guided by international standards including OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas. Hindalco believes in peaceful and long-term resolutions and adopts conflict-sensitive approach in all decisions impacting affected populations. We have the responsibility to conduct heightened human rights due diligence in conflict-affected areas where our business operations extend and ensure safety of our workforce.
- 10. Prohibiting discrimination in our operations: In line with our constitutional provisions and relevant laws, Hindalco upholds a strict zero tolerance policy towards discriminationⁱ, ensuring an inclusive and respectful workplace for all. It has adopted policy to prevent any such violation in hiring and employment practices or being disadvantaged or given preference, whether directly or indirectly, on any of the following grounds: religion, race, ethnicity, origin, caste, nationality, citizenship, socio-economic background, spiritual belief, political affiliation, age, disability, gender identity and/or expression, skin colour, marital status, pregnancy status, medical history or any other ground.

Hindalco does not insist on pregnancy tests or medical tests unless required by law and/or prudent workplace safety, especially given the nature of Hindalco's business operations. We do not discriminate or refuse an opportunity to a candidate on account of medical status or refusal to take medical test or pregnancy status. However, such tests are conducted when necessitated by the nature of work to ensure workplace safety of the candidate or others and in consonance with legal and industry norms prevalent at relevant time.



Any medical tests required to be carried out at the behest of Hindalco, are conducted through healthcare practitioners or laboratory technicians, who are qualified and licensed/certified in accordance with applicable laws and when conducted off-site, at a safe and duly licensed healthcare facility/laboratory. Due care is taken during the conducting of such tests, and the test reports/results are provided to the subject. The medical and personal data collected during the tests including the test reports are confidential and are maintained, stored, and processed in accordance with applicable data privacy laws. The costs of such medical tests are borne by Hindalco.

Hindalco encourages and promotes gender diversity and is committed to offer full support to all working mothers – would be, nursing, as well as mothers of young children or children with special needs. In accordance with applicable laws and company policies, we offer maternity benefits as well as post-natal and other employee benefits and facilities.

Hindalco encourages its employees, who observe, are informed of, or experience to report instances of value violation, inequality or any untoward incident with assurance of no retaliation in accordance with the Corporate Principles and Code of Conductⁱⁱ and Whistle Blower Policyⁱⁱⁱ. Equal treatment to all is a principle deeply enshrined in Hindalco's ethos including employment practices, training, rewards and disciplinary actions, unless prohibited by applicable laws.

11. Prohibiting harassment and abuse in our operations:

Hindalco has a zero-tolerance policy towards victimization^{iv}, abuse^v, and workplace harassment (sexual^{vi}, physical^{vii}, psychological^{viii}, cyber^{ix}) whether unsolicited or not, singular or repeated, in any form and through any media. Hindalco is deeply committed to fostering a safe and trustworthy work environment.

Hindalco encourages its employees, who observe, are informed of, or experience to report instances of harassment, value violation or any untoward incident with assurance of no retaliation in accordance with the Corporate Principles and Code of Conduct^x and Whistle Blower Policy^{xi}. Equal treatment to all is a principle deeply enshrined in Hindalco's ethos including employment practices, training, rewards and disciplinary actions, unless prohibited by applicable laws.

Hindalco ensures that all security practices are gender appropriate and nonintrusive. Security forces engaged by us are contractually and legally obliged to respect human rights espoused in this policy. Continuous training, guidance, and monitoring of the security forces is how Hindalco ensures they comply with human rights principles adopted by Hindalco.



12. Undertaking an iterative due diligence process, aimed at identifying, assessing and managing potential human rights related risks and impacts in areas of our control through Hindalco's Human Rights Assessment Framework checklist and integrating the same in the company's comprehensive Enterprise risk management framework:

Hindalco acknowledges that upholding and protecting human rights within our business operations as well as the supply chain and the surrounding communities is a continuous process and of critical importance to its Board of Directors. The Board is invested and committed to refine the principles under this policy and ensure its effective implementation. We therefore monitor implementation of our human rights' due diligence on an ongoing basis, accounting for changing legal framework, external factors, the dynamic nature and scope of business activities, and findings from our reports. Based on this information, we constantly improve human rights due diligence processes at our company, as well as in our relationships with suppliers and other business partners.

The responsibility of implementing the policy is clearly defined and delegated with the respective operating units and with business partners, who are required to fulfill the due diligence obligations that apply to them. The overall overseeing of the implementation vests with the Chief Human Rights Officer (CHRO), as the dedicated appointee of the Hindalco Board for this policy and report on gaps, improvements areas, and social impact with the Managing Director and the Board of Directors of Hindalco.

- 13. Protecting the data confidentiality: Hindalco understands that it is a custodian of data including personal and sensitive data, for its employees, suppliers, customers, and any other third parties we do business with. We therefore handle this responsibility with utmost care. We comply with applicable data protection and privacy laws to protect and prevent disclosure of any such data which is personal, sensitive, or confidential, that is entrusted to us. Our Data Privacy Policy explains how we access, collect, use, share, transfer, and store this information as permitted by law and in accordance with our privacy policies.
- 14. Promoting awareness of human rights among employees through training and communication: At each operational unit within Hindalco, Human Rights champions are responsible for effective dissemination of and implementing the policy principles and their compliance in their area. They have an obligation to inform the employees/ workers of the content and importance of this Policy during initial orientation and to advise and support them in implementing its principles in their day-to-day work. At the same time, these champions must comply with the Policy themselves. They are also responsible for conducting awareness training at regular intervals and maintain records of such training.



15. Providing access to remedy by resolving grievances in a timely and culturally appropriate manner: Hindalco has a Vigil Mechanism and Whistle Blower Policy, under which employees are free to report violations of applicable laws including human rights violations, and the Code of Conduct. Employees are encouraged to report any concerns to their manager, Legal, Compliance or Human Resources. In addition, employees and third parties can utilize Aditya Birla Group's (ABG) Ethics Hotline to report concerns, including violation of this Policy on Human Rights. Reports can be made anonymously, and the identity of individuals making or involved in a report will be protected, in accordance with the applicable law. Details of ABG Ethics hotline along with the process flow for handling the concerns raised are hereto marked and annexed as Annexure B. All submitted reports concerning Hindalco are analyzed and routed to the appropriate persons within Hindalco for review, assessment and, if appropriate, investigated as part of our formal grievance process. Hindalco does not tolerate any form of retaliation against any individual who reports or participates in the investigation of any suspected unlawful conduct, including conduct that violates our position on human rights.

It is ensured that all personnel who receive such complaints or grievances are formally trained to address such complaints or grievances.

- 16. Providing victim Support: Personnel handling discrimination, harassment or any value violation issue are trained to provide required support and assistance to the parties including the aggrieved party. They make sure that all concerned parties are aware of their rights and obligations, including interim rights during the pendency of proceedings/inquiry. Counselling services, if required, are also made available in certain cases as per company policies or applicable laws. Similarly, paid leave option is also made available to select cases of physical or mental abuse or harassment as well as sexual harassment as per company policies in line with applicable laws.
- 17. Ensuring transparent reporting & robust Documentation: We aim to be transparent about how we conduct and fulfil our Human Rights due diligence obligations and align with our overall sustainable development goals. The insights received from our due diligence exercise as well as external stakeholders on our practices and control measures and the effectiveness of the same is accounted for in the continuous improvement plan.

We ensure that data collected during the audit as well as from external sources is properly documented, stored, and retained in accordance with our company policies and procedures in line with the applicable laws, and available for review by the senior management as well as to the Board of Directors when required.

We ensure that documents pertaining to all disciplinary actions are meticulously and contemporaneously maintained.



18. Promoting mindful engagement with the workforce: Hindalco proactively and on a need, basis carries out employee interventions to collect feedback from its workforce on several employment relevant topics through various modes such as employee surveys, interview, focused group discussions, offsites. We foster work-family culture and believe in thanking families of our employees for their continued support through annual celebrations. Gifting and hospitality to our employees is strictly in accordance with our company policies and in accordance with applicable laws.

for Hindalco Industries Limited

Satish Pai Managing Director

Discrimination means and includes unjust and prejudicial treatment based on any of the bias causing factors mentioned in this Policy.

[&]quot;https://www.hindalco.com/Upload/PDF/hindalco-code-conduct.pdf

iii https://www.hindalco.com/Upload/PDF/hindalco-whistle-blower-policy-19.pdf

iv Victimization means and includes an act of singling out someone without due cause and based on any of the bias causing factors mentioned in this Policy.

^v Abuse means and includes undue use or misuse of power, influence, or strength.

vi Sexual harassment has the meaning ascribed to it under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and judicial interpretations thereof.

vii Physical harassment includes violence, physical attacks, threats, assault, battery, damage to the property.

viii Psychological harassment includes bullying, passing hurtful remarks, causing hostile work environment, intimidation, blackmailing, aggression, manipulation and any such act, whether deliberate or not, which causes emotional pain or disturbance.

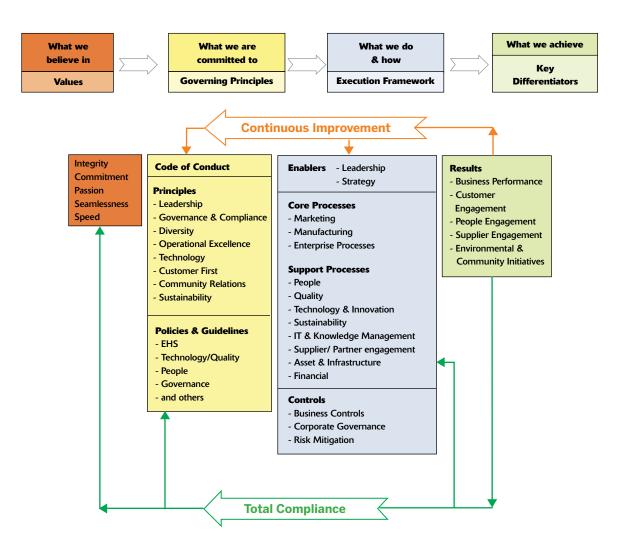
ix Cyber harassment includes use of digital data through any means of technology or media to stalk, control, manipulate, threaten, defame, shame, humiliate or cause any disturbance to a person.

 $^{^{\}rm x}\ https://www.hindalco.com/Upload/PDF/hindalco-code-conduct.pdf$

xi https://www.hindalco.com/Upload/PDF/hindalco-whistle-blower-policy-19.pdf

Annexure A

Hindalco Management Framework (HMF)



The Hindalco Management Framework is the proprietary intellectual property of Hindalco Industries Limited.

Annexure B



Ethics Helpline – Integrity Matters Process Flow

Aditya Birla Group



How does it work for the Reporter? Ethics Helpline Process Flow for reporting

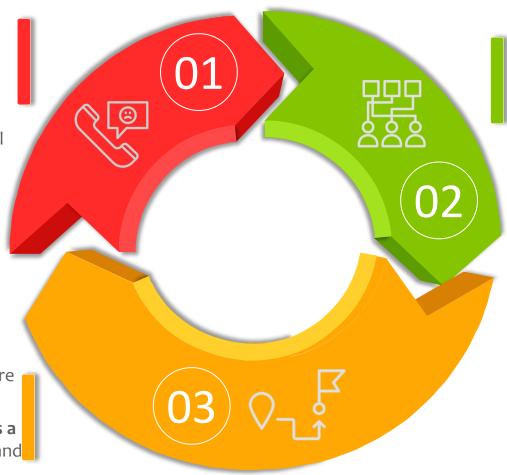


Reporting complaint

- A Reporter calls on Integrity Matters tollfree phone line and selects his/her preferred language
- ► The person describes the potential or actual wrongdoing to a specialist
- The Reporter receives a unique report number and may send supporting evidence
- ► The Reporter can use other channels like web, email, fax and post as well.

Investigation & Closure

- ► Case Managers classify the report; assign status, priority and Investigator based on nature of complaint
- The Case Investigator formulates and sends a response to the Reporter with a confirmation and asks for further information, if any, via the CMS



Notification to company

- ► Integrity Matters transcribes and translates the recording into written text and attaches evidence (if any)
- ► Integrity Matters enters the case into the Case Management System (CMS)
- Designated Case Manager is alerted via email

Note:

- ⁻ 'Reporter' is the person who reports the complaint. 'Case managers' are the Business-wise SPOCs who manage the CMS.
- The reporter may call on the toll-free phone number again and provide the unique report key and to understand the management response and case status or provide additional information
- Similar process is followed for reports made via other channels like web, email, fax and post etc.
- Integrity Matters does not capture IP address or store web cookies to further protect reporter confidentiality

How does it work for the Company? Ethics Helpline Process Flow for the Case Manager



Complaint reported

- ► Designated Case Managers are **alerted of any new report** via automated email
- ► They have to then log-in to the online Case Management System (CMS) to view the report

Tracking & Closure

- A detailed **case diary** is to be maintained on the CMS for each case, which can also be downloaded by the Case managers
- ► Management can view analysis of case data in real time and generate **reports** on-demand
- ► Case Managers/Investigators must track and update the case status & closures on the CMS



Check & Assign

- ► Case Manager to **classify** the case based on nature of complaint, **set priority and assign Investigator/s**
- ➤ Case Manager/ Investigators to assign a status of resolution and enter case notes to the case diary on the CMS
- ► In case of POSH cases, kindly direct to POSH committee and in case of Value Violation, direct it to the VSC committee.

Investigation

- The system allows Investigators to send a management response including any **follow-up questions** to the Reporter, even when the Reporter is anonymous
- ► The system allows entering of any cases received internally (through walk-ins etc.) in the system. Case managers can use this feature to maintain a single secure repository of all cases and case data.

Note:

- Reporter is the person who reports the complaint. Case managers are the Business-wise SPOCs who manage the CMS (Web platform for Managing Disclosures)
- Similar process is followed for reports made via other channels like web, email, fax and post etc.

Contact details for employees to reach out



If you come across instances of Values Violation, Unethical/Illegal practices within ABG, report at:

- Call: 1800-102-6969
- E-mail: abg.ethicshelpline@integritymatters.in
- Website: abgethicshelpline.integritymatters.in
- Integrity Matters Postal Address:

Aditya Birla Group EthicsHelpine C/o Integrity Matters

Unit 1211, CENTRUM, C-3,

S.G. Barve Road, Wagle Estate,

Thane West, Maharashtra – 400604