

Code of Conduct Policy

1. Purpose

The purpose of this Code of Conduct is to define the ethical, social, environmental, and governance standards expected from all employees, contractors, suppliers, and business partners of SRF ALTECH.

This Code is implemented in accordance with:

- ASI Performance Standard V3, Criterion 1.3
- GRI Standards relevant to environmental, social, governance, and ethical conduct
- Applicable local, national, and international legal requirements

This Code applies to all SRF ALTECH operations, supply chains, logistics, associated facilities, and stakeholder interactions.

2. Scope

This Code applies to:

- All employees of SRF ALTECH at every level
- Contract workers, consultants, and temporary staff
- All suppliers, service providers, and subcontractors
- All joint ventures and associated entities under SRF ALTECH control
- Any party conducting work on behalf of SRF ALTECH

3. Principles of the Code of Conduct

(Aligned with ASI Performance Standard requirements)

3.1 Ethical Conduct and Integrity (ASI 10.1–10.6)

SRF ALTECH shall:

- Conduct all business with honesty, fairness, and transparency
- Maintain zero tolerance for bribery, corruption, facilitation payments, fraud, and money laundering
- Avoid conflicts of interest
- Maintain accurate books, records, and reporting
- Prohibit anti-competitive behaviour and cartel practices

3.2 Compliance with Laws and Regulations (ASI 1.1)

SRF ALTECH shall comply with all:

- Applicable statutory, regulatory, contractual, and industry requirements
- Internationally recognised business integrity and ESG standards
- Trade, sanctions, customs, and anti-corruption laws

3.3 Human Rights and Labour (ASI Principle 11)

SRF ALTECH is committed to:

- Respecting internationally recognised human rights
- Prohibiting child labour, forced labour, modern slavery, and human trafficking

- Ensuring freedom of association and collective bargaining
- Ensuring non-discrimination, fairness, dignity, and respect at work
- Protecting privacy and personal data of all individuals

Where Indigenous Peoples are present, SRF ALTECH shall respect their rights, cultures, and traditions, in line with ASI requirements.

3.4 Health, Safety, and Well-being (ASI Principle 6)

SRF ALTECH shall:

- Provide a safe and healthy work environment
- Implement hazard identification and risk assessment processes
- Prevent workplace incidents, injuries, and occupational diseases
- Investigate and correct near-misses and incidents
- Promote physical and mental well-being programs

3.5 Environmental Responsibility (ASI Principles 5, 7, 8, 9)

SRF ALTECH shall:

- Minimise environmental impacts across the operational lifecycle
- Reduce emissions, waste, water consumption, and energy usage
- Implement pollution controls and emergency response plans
- Protect biodiversity and ecosystems
- Manage waste streams responsibly, including aluminium scrap, packaging, oils, and chemicals
- Promote circularity and recycling of aluminium products

3.6 Responsible Sourcing & Supply Chain (ASI Principle 7)

SRF ALTECH shall:

- Source materials responsibly and evaluate suppliers' ESG practices
- Prefer ASI Chain of Custody (CoC) certified suppliers where possible
- Conduct supplier risk assessments covering human rights, labour, safety, and environment
- Avoid sourcing from conflict-affected areas unless aligned with OECD Due Diligence Guidance

3.7 Product Stewardship (ASI Principle 8)

SRF ALTECH shall:

- Ensure products are safe, compliant, and responsibly manufactured
- Provide accurate information regarding composition, recyclability, and environmental impact
- Promote lifecycle thinking and circular economy principles

3.8 Stakeholder Engagement (ASI Principle 3)

SRF ALTECH shall:

- Engage transparently with stakeholders, Affected Populations, and local communities
- Respect community concerns and cultural sensitivity
- Maintain accessible and effective grievance mechanisms

3.9 Confidentiality and Data Protection

SRF ALTECH shall:

- Protect confidential, proprietary, and personal information
- Ensure compliance with applicable data protection laws

3.10 Whistleblower Protection (ASI 10.7)

SRF ALTECH ensures:

- Confidential, secure, and anonymous reporting channels
- Protection against retaliation
- Prompt investigation and corrective actions

4. Implementation and Responsibilities

Role	Key Responsibilities
Top Management	Approve, endorse, and enforce the Code of Conduct; allocate resources
Compliance Officer	Monitor compliance, manage grievances, investigate breaches
EHS Manager	Ensure environmental and safety compliance
HR Head	Uphold fair labour practices and diversity
Procurement Head	Evaluate supplier ESG risks and enforce responsible sourcing

5. Communication and Training

SRF ALTECH shall:

- Share the Code of Conduct with all employees, suppliers, and business partners
- Include the Code as part of supplier and contractor agreements
- Provide mandatory annual training
- Make the Code accessible in local languages

6. Monitoring, Review, and Continuous Improvement

(Fully aligned with ASI Criterion 1.3(c), 1.3(d), 1.3(e))

SRF ALTECH shall:

6.1 Review Frequency (Mandatory)

- Conduct a full review of the Code of Conduct at least every 5 years

6.2 Early Review Triggers (ASI-Required)

The Code shall be reviewed earlier if:

- There is a material change to the business affecting environmental, social, or governance risks
- There is a merger, acquisition, expansion, or significant restructuring
- New regulatory or legal obligations arise
- A material breach of the Code is identified
- A control gap is detected
- Feedback from Affected Populations or stakeholders indicates misalignment

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6.3 Review Considerations

Reviews shall evaluate:

- Alignment with ASI Performance Standard requirements
- Whether the Code reflects current business practices
- Any gaps between commitments and actual performance
- Stakeholder expectations, including Indigenous Peoples where relevant
- Effectiveness of implementation and enforcement

6.4 Public Disclosure (ASI Criterion 1.3(b))

SRF ALTECH shall publicly disclose the latest Code of Conduct through:

- Sustainability Report / ESG Report
- Corporate website
- Annual Report

7. Disciplinary Actions

Violations of the Code may result in:

- Corrective actions, retraining, or warnings
- Termination of employment or business relationships
- Reporting to regulatory authorities where legally required

Approved By,



Site Head, SRF Altech Limited.