



Environmental, Social, and Governance (ESG) Policy

1. Purpose

The purpose of this Environmental, Social and Governance (ESG) Policy is to establish SRF ALTECH Ltd.'s commitment to responsible, ethical, and sustainable business practices. This Policy is aligned with the Aluminium Stewardship Initiative (ASI) Performance Standard and relevant GRI standards. Its intent is to guide the company in minimizing environmental impacts, enhancing social well-being, and ensuring strong governance across all operations.

2. Scope

This Policy applies to all SRF ALTECH Ltd. Facilities, employees, officers, directors, contractors, suppliers, service providers, and any stakeholders engaged in company activities.

The Policy covers all environmental, social, and governance-related practices, decisions, and operational processes.

3. Policy Principles

3.1 Environmental Stewardship

SRF ALTECH Ltd. commits to:

- Reduce environmental impacts across all operations.
- Promote responsible resource use, pollution prevention, and continual improvement.
- Comply with all applicable environmental laws and ASI requirements.

3.2 Social Responsibility

We commit to:

- Respect and protect human rights and labour rights.
- Ensure safe, healthy, and fair working conditions.
- Promote diversity, equality, and non-discrimination.
- Engage meaningfully with Affected Populations and local communities.

3.3 Governance Integrity

We commit to:

- Ensure transparency, accountability, and ethical behaviour.
- Prevent corruption, bribery, and conflicts of interest.
- Establish internal controls to support responsible decision-making.

4. Implementation of ESG Policy

4.1 Adoption of Integrated Policies

In alignment with ASI Criterion 2.1(a), SRF ALTECH Ltd. will:

- Implement integrated or stand-alone ESG policies consistent with ASI Performance Standard.
- Ensure these policies reflect the company's scale, risks, and impacts.
- Incorporate statements of principles and intentions supporting ASI requirements.

4.2 Senior Management Endorsement

As required by ASI Criterion 2.1(b):

- Senior management formally endorses this ESG Policy.
- Management ensures that operations align with the Policy.
- Resources (financial, human, technical) are provided for implementation.
- Gaps between policies and business practices are analysed and addressed.
- At least annually, senior management reviews ESG issues and progress.

4.3 Regular Review of Policies

As per ASI Criterion 2.1(c–e):

ESG Policies will be reviewed:

- At least every 5 years,
- When material business changes occur (e.g., acquisitions, expansions),
- When new or emerging ESG risks are identified,
- When legal or regulatory changes require updates,
- When a Policy is found to have a control gap or be ineffective.

Reviews may involve Affected Populations, Workers, unions, suppliers, or community representatives.

4.4 Communication of Policies

Aligned with ASI Criterion 2.1(f):

- ESG policies will be communicated internally through inductions, training, posters, intranet, and awareness programs.
- Employees must understand the ESG requirements related to their roles.
- Policies will be communicated externally where relevant—through the company website, stakeholder meetings, for Visitors on site, and upon request.

5. ESG Management Systems

To support implementation, SRF ALTECH Ltd. will maintain:

5.1 Environmental Management System (EMS)

- To monitor, manage, and improve environmental performance.
- To comply with legal and ASI environmental requirements.

5.2 Social Management System (SMS)

- To address human rights, labour rights, community engagement, and occupational health and safety.

5.3 Governance Controls

- To ensure compliance, ethical business conduct, and transparent reporting.

6. Responsible Sourcing

- A Responsible Sourcing Policy is adopted consistent with ASI requirements.
- The Policy addresses environmental, social, and governance risks in supply chains.
- The Policy is publicly disclosed and reviewed periodically.

7. Impact Assessments

7.1 Environmental and Social Impact Assessments

- Conducted for new projects or major operational changes.
- Baseline conditions and potential impacts are evaluated.

7.2 Management Plans

- Impact management plans are developed, updated, and implemented to prevent, mitigate, and remediate impacts.

8. Human Rights Impact Assessments

- Human Rights Impact Assessments (HRIA), including gender analysis, are conducted where required.
- HRIA includes Indigenous Peoples considerations (if applicable).
- A gender-sensitive Human Rights Management Plan is created and periodically reviewed.

9. Emergency Preparedness and Business Resilience

9.1 Emergency Response

- Site-specific emergency response plans are developed in consultation with Workers and Affected Populations.
- Plans are regularly reviewed and tested.

9.2 Business Resilience Planning

- A Business Resilience Plan addresses scenarios such as reduced staffing, project delays, temporary suspensions, or facility closures.
- Stakeholder engagement is included to prevent negative social or environmental outcomes.

10. Mergers, Acquisitions, and Divestments

10.1 Due Diligence

- ESG considerations are included in due diligence for mergers and acquisitions.

10.2 Post-Transaction Activities

- Material ESG impacts are communicated to Affected Populations.
- Mitigation plans are developed collaboratively and progress is transparently shared.

11. Closure, Decommissioning, and Rehabilitation

- ESG practices are applied during planning for closure and decommissioning.
- Affected Populations are consulted and involved where appropriate.
- Financial assurance is maintained to meet closure and rehabilitation commitments.

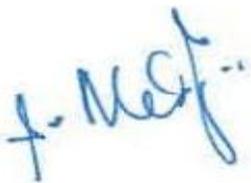
12. Monitoring, Reporting, and Continuous Improvement

- ESG performance is monitored through internal audits, reviews, and stakeholder engagement.
- Public reporting follows GRI standards and ASI guidelines.
- The company promotes continual improvement in ESG performance.

13. Review and Revision

- This Policy will be reviewed at least every five years, or earlier if required due to risks, operational changes, or compliance needs.
- Revisions will be documented, and relevant stakeholders will be notified.

Approved By,



Site Head, SRF Altech Limited.