



# Human Rights Impact Assessment Policy

## 1. Purpose

This procedure establishes a comprehensive framework for identifying, assessing, preventing, mitigating, and remediating Human Rights impacts associated with New Projects or Major Changes at SRF ALTECH LTD facilities.

It ensures compliance with:

- ASI Performance Standard (Criterion 2.6)
- UN Guiding Principles on Business & Human Rights (UNGPR)
- ILO Core Conventions
- International Bill of Human Rights

The procedure ensures:

- A gender-sensitive, participatory HRIA process
- Inclusion of Indigenous Peoples' rights where applicable
- Consideration of historical aluminium operations
- Public disclosure of HRIA and Human Rights Impact Management Plans

## 2. Scope

This procedure applies to:

- All SRF ALTECH LTD facilities, subsidiaries, and controlled operations
- All New Projects or Major Changes to existing facilities
- All contractors, suppliers, and business partners within SRF ALTECH's Area of Influence
- All Rightsholders including workers, communities, Indigenous Peoples, women, children, elderly and other vulnerable groups.

Where Indigenous Peoples are present, FPIC-aligned consultative processes are mandatory.

## 3. Definitions

**Human Rights Impact Assessment (HRIA)**

A structured, participatory assessment of actual and potential Human Rights impacts, using international Human Rights instruments as benchmarks.

**Rightsholders**

Individuals or groups whose rights may be affected (workers, communities, Indigenous groups, supply chain workers, women, children, etc.).

**Business Relationships**

Entities directly linked to SRF activities through supply chain, contracts, partnerships, or government relationships.

**Material Impact**

A Human Rights impact that is severe, large-scale, irreversible, or difficult to remediate.

## 4. Roles & Responsibilities

Role	Responsibilities
Sustainability Head	Overall HRIA governance, oversight, reporting to Board; ensures alignment with ASI Criterion 2.6.
EHS Manager	Integrates environmental and health impacts; evaluates historic pollution or emissions; monitors fluoride, waste, air and water impacts.
Legal Counsel	Ensures FPIC compliance, Indigenous rights protections, compliance with international Human Rights law.
HR Director	Workers' rights, non-discrimination, gender inclusion, grievance mechanisms.

Role	Responsibilities
Supply Chain Head	Supplier HRIAs; assesses forced labour/child labour risks; audits ASI compliance.
Community Relations Manager	Direct engagement with communities; participatory assessments; transparent communication.

## 5. HRIA Procedure

### 5.1 Step 1 – Preparation

#### a. Determine Applicability (Decision Tree per ASI Appendix 1)

- Identify whether a New Project / Major Change affects Rightsholders.
- Document justification when HRIA is not required.

#### b. Establish Baseline Conditions

Include:

- Social, cultural, environmental baseline
- Gender baseline
- Indigenous Peoples' baseline
- Impacts from historic SRF aluminium operations, if relevant

#### c. Stakeholder & Rightsholder Mapping

Include:

- Workers (contract & permanent)
- Local communities
- Indigenous Peoples & territories
- Migrant workers
- Women, children, elderly, differently abled
- Suppliers and contractors
- Cross-border impacts if applicable

### 5.2 Step 2 – Assessment Execution

#### a. Participatory & Non-Discriminatory Data Collection

Methods include:

- Worker interviews (gender-balanced)
- Focus groups (women-only groups where needed)
- Indigenous Peoples' community meetings
- Household surveys
- Supplier audits
- Health risk monitoring
- Land use, cultural heritage mapping

#### b. Scope of Assessment (ASI Requirements)

Assessment must include:

- All Human Rights in the Universal Declaration of Human Rights
- ILO Core Conventions
- Impacts linked through Business relationships
- Cumulative impacts including historic operations
- Special attention to vulnerable groups

#### c. Severity Analysis

Rate impacts by:

- Scale
  - Scope
  - Irremediability
  - Likelihood
- Classify as High, Medium, Low.

### 5.3 Step 3 – Reporting

HRIA Report must include:

- Methodology
- List of Rightsholders engaged
- Indigenous Peoples' engagement documentation

- Gender analysis
- Identified impacts
- Severity ranking
- Baseline data
- Cultural, health, labour rights findings
- Cumulative and trans-boundary impacts
- Mitigation & remedy recommendations

Internal Review

- Reviewed by Legal Counsel
- Approved by CEO / Sustainability Head

**6. Human Rights Impact Management Plan (HRIMP)**

6.1 Mitigation & Remedy Action Plan

Actions must follow the severity priority order:

Risk Identified	Mitigation / Remedy Action	ASI Link
Indigenous Land Rights	FPIC process, benefit-sharing, cultural heritage protection	2.6(c), 5.3
Worker Safety (molten metal, heat stress)	Automation, PPE, AI hazard detection, cooling systems	4.5
Fluoride Emissions	Real-time monitoring; community health clinics	4.8
Water Scarcity	Zero-discharge technology; community water access	4.2
Child/Forced Labor Risk (suppliers)	Mandatory ASI certification; supplier capacity building	9.2

6.2 Timeline & Responsibilities

Each action is assigned:

- Owner
- Budget
- Due date
- KPIs

6.3 Grievance Mechanisms

Must be:

- Rights-compatible
- Accessible
- Culturally appropriate
- Available to workers, communities, Indigenous Peoples

**7. Monitoring, Review & Continuous Improvement**

7.1 Review Frequency

As required by ASI:

- Every 5 years (minimum)
- After any material change to business activities
- After any control gap, incident, or complaint
- After merge/acquisition
- As part of ongoing Human Rights Due Diligence

7.2 KPIs

- Number of grievances resolved
- Supplier compliance rates
- Worker safety indicators
- Community health indicators
- Indigenous Peoples’ engagement frequency

7.3 External Audits

- Biennial third-party HRIA audit
- Review of methodological adherence to ASI’s 5 key components

## 8. Communication & Disclosure (ASI 2.6(h))

External Public Disclosure

SRF will publicly disclose:

- HRIA summary report
- Latest active Human Rights Impact Management Plan
- Without exposing Rightsholders to risk
- Respecting commercial confidentiality

Disclosures may be via:

- Sustainability report
- Annual report
- SRF ALTECH website

Internal Communication

- Regular HRIA training for employees
- Community feedback sessions
- Supplier briefings

## 9. Documentation & Training

9.1 Document Management

- HRIA reports kept for minimum 10 years
- Audit records securely stored
- Stakeholder engagement logs maintained

9.2 Training Requirements

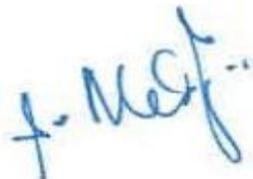
Annual mandatory training for:

- Site managers (community engagement, FPIC)
- Procurement teams (Human Rights due diligence)
- HR teams (non-discrimination, gender sensitivity)
- EHS staff (health & safety rights implications)

## 10. Sector-Specific Human Rights Risks (Aluminium Industry)

Impact Area	Aluminium Sector Risk	Required Mitigation	ASI Reference
Labour Rights	Forced/child labour in bauxite mining	ASI-certified sourcing only	9.2
Community Health	Emissions (fluoride, SO <sub>2</sub> )	Monitoring, health surveillance	4.8
Indigenous Peoples	Land access, heritage impacts	FPIC, cultural protection	5.3
Worker Safety	Molten metal exposure	Automation, emergency systems	4.5

Approved By,



Site Head, SRF Altech Limited.

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