



Merger And Risk Policy

1. Purpose

To establish a systematic framework for conducting environmental, social and governance (ESG) due diligence during mergers and acquisitions, including the assessment of risks associated with Historic Aluminium Operations, and ensuring that post-merger integration protects Affected Populations, complies with ASI Performance Standard V3, and mitigates all Material ESG impacts.

2. SCOPE

This Policy applies to:

- All mergers, acquisitions, joint ventures, and asset purchases undertaken by SRF ALTECH LTD
- All target facilities, subsidiaries, or partners involved in aluminum rolling, separation, annealing, or packing operations
- All post-merger/ post-acquisition integration activities

3. DEFINITIONS

Term	ASI-Aligned Definition
Historic Aluminium Operations	Environmental, social, or governance impacts arising from past aluminum-related activities prior to acquisition.
Material ESG Impact	Any environmental, social, governance or human rights issue that may affect compliance with ASI, regulatory obligations, or stakeholder well-being.
Affected Populations and Organisations	Communities, workers, Indigenous Peoples, or local organisations impacted by past or present facility operations.

4. RESPONSIBILITIES

Role	Responsibilities
M&A Director	Lead ESG due diligence and integration planning; ensure ASI criteria are incorporated.
EHS Compliance Head	Evaluate environmental legacy issues (soil contamination, emissions, waste, water use).
HR Integration Lead	Assess labour conditions, human rights practices, and community impacts.
Legal Counsel	Assess compliance, land and permit issues, prior liabilities, FPIC obligations.
ASI Standards Manager	Verify alignment with ASI Performance Standard V3 and manage conformity documentation.

5. PROCEDURE

5.1 Phase 1 — ESG Due Diligence (Aligned with ASI 2.9(a))

Step 1: Review of Environmental, Social & Governance Practices

The due diligence shall review:

- Legacy environmental issues (land contamination, waste, emissions, water use)
- Labour rights, health and safety, child/forced labour risks
- Community impacts and Indigenous Peoples' rights (including FPIC)
- Governance issues (anti-corruption, compliance, permit history)
- Step 2: Review of Historic Aluminium Operations

This includes:

- Past contamination in rolling/annealing areas
- Historic labour or community disputes
- Old waste disposal practices
- Legacy emissions or water discharge issues

Step 3: Stakeholder Engagement

- Workers: confidential interviews, surveys
- Communities: consultations, meetings, site visits
- Indigenous groups (where applicable): FPIC consultation
- Regulators: compliance reviews and permit verification
-

Step 4: Materiality Assessment

Risks rated by severity, likelihood, scale, and remediability as per ASI guidance.

5.2 Phase 2 — Post-Merger Integration (Aligned with ASI 2.9(b))

Requirement I — Information Sharing

Immediately after acquisition, SRF ALTECH shall:

- Share information on Material ESG impacts, including Historic Aluminium Operations, with Affected Populations and Organisations in an accessible format.

Requirement II — Mitigation Plan

SRF shall develop and implement an impact mitigation plan:

- In Consultation with Affected Populations
- With participation where possible
- Addressing all identified Material ESG impacts
- Including Environmental, Social, Human Rights and Governance risks

Examples of measures:

- Soil remediation
- Safety system upgrades
- Community benefit programs
- Labour dispute resolution
- Restoration of impacted natural resources

Requirement III — Annual Progress Disclosure

SRF shall:

Share annual updates on mitigation plans with Affected Populations

- Publish a public summary (website, sustainability report)
- Document all consultations and responses

5.3 Phase 3 — Monitoring & Review

- Quarterly ASI conformity reviews
- KPI tracking: grievances, community outcomes, emissions, safety performance
- Annual internal audit
- Revisions triggered by:
 - New risks
 - Community concerns
 - Regulatory changes
 - ASI surveillance audits

6. RISK ASSESSMENT MATRIX (SRF-specific, ASI-aligned)

(You can keep this section—just ensure it complements ASI requirements.)

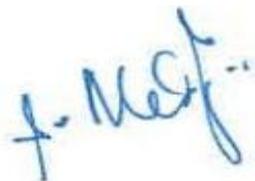
7. DOCUMENTATION & DISCLOSURE

- Maintain all due diligence records for 10 years
- Maintain consultation records for 7 years
- Public disclosure shall not endanger Affected Populations or violate confidentiality (as per ASI 2.6 & 2.9 guidance)

8. TRAINING REQUIREMENTS

- M&A teams: ASI Standard V3, ESG due diligence
- Site leads: Environmental & social compliance, community engagement
- Frequency: Pre-deal, Post-merger, and annual refresh

Approved By,



Site Head, SRF Altech Limited.