

Responsible Sourcing Policy

1. Purpose

The purpose of this Responsible Sourcing Policy is to ensure that all sourcing activities at SRF Altech are conducted in a responsible, ethical, transparent, and sustainable manner, in full alignment with:

- Aluminium Stewardship Initiative (ASI) Performance Standard (Criterion 2.4 and related Criteria)
- GRI Standards (GRI 2, GRI 3, GRI 204, GRI 308, GRI 414)
- UN Guiding Principles on Business and Human Rights (UNGPs)
- OECD Due Diligence Guidance for Responsible Supply Chains

This Policy establishes a framework for responsibly sourcing aluminium and other materials to minimise environmental and social impacts, ensure traceability, and maintain ethical business conduct throughout the supply chain.

This Policy shall be publicly disclosed and periodically reviewed as required under ASI Criterion 2.4.

2. Scope

This Policy applies to:

- All procurement of raw materials, aluminium, semi-finished materials, packaging, consumables, chemicals, and services.
- All domestic and international suppliers, subcontractors, and service providers.
- All tiers of the supply chain contributing to SRF Altech's products and operations.
- All SRF Altech Facilities and Business Units.

3. Policy Commitments

3.1 Legal and Ethical Compliance

SRF Altech shall:

- Source only from suppliers who comply with applicable national laws, international regulations, and conventions.
- Prohibit child labour, forced labour, human trafficking, and discrimination in line with ILO Core Conventions and ASI Criterion 11.1.
- Ensure suppliers uphold ethical business conduct, including compliance with anti-corruption regulations.

3.2 Responsible Aluminium Sourcing

- Prioritise sourcing from suppliers with ASI Chain of Custody (CoC) Certification or equivalent responsible sourcing credentials.
- For non-certified suppliers, require documented evidence of sustainability performance.
- Avoid sourcing from conflict-affected and high-risk areas unless aligned with OECD Due Diligence Guidance and ASI Criterion 9.8.
- Ensure segregation and traceability of responsibly sourced materials.

3.3 Human Rights Protection

- Uphold the UNGPs and respect internationally recognised Human Rights.
- Ensure that suppliers provide safe working conditions, fair wages, freedom of association, and zero tolerance for harassment or abuse.
- Address potential Human Rights risks through Due Diligence aligned with ASI Criterion 9.1.

3.4 Environmental Stewardship

- Source from suppliers committed to reducing GHG emissions, energy use, waste, and water impacts.
- Avoid sourcing materials linked to deforestation, biodiversity loss, or significant negative environmental impacts.
- Encourage suppliers to adopt circular economy practices and maximise recycling.

3.5 Anti-Corruption and Fair Business Practices

- Maintain zero tolerance for bribery, corruption, facilitation payments, extortion, or anti-competitive practices.
- Prohibit gifts or benefits that could improperly influence sourcing decisions.

3.6 Quality, Safety & Traceability

- Require suppliers to provide complete material traceability from origin to delivery.
- Ensure sourced materials meet all contractual, legal, and customer specifications.

4. Due Diligence & Risk Management

SRF Altech shall:

- Conduct ESG risk-based Due Diligence on all suppliers at least annually.
- Assess suppliers as low, medium, or high risk, based on environmental, social, and governance factors.
- Require Corrective Action Plans (CAPs) for medium- and high-risk suppliers and verify closure through follow-up audits.
- Apply enhanced Due Diligence to suppliers operating in high-risk geographies or sectors.

5. Verification, Monitoring & Reporting

- Conduct supplier audits, assessments, and site visits for high-risk or critical suppliers.
- Require annual ESG self-assessments in alignment with GRI 308-1 and GRI 414-1.
- Use third-party verification where appropriate.
- Monitor performance against sourcing targets and report progress annually.

Targets:

- By 2026: 90% of aluminium sourced from suppliers meeting SRF Altech ESG criteria.
- By 2027: 75% of aluminium sourced from ASI-certified or equivalent responsible sources.

6. Supplier Engagement & Capacity Building

- Communicate this Policy to all suppliers through contracts, onboarding, and renewal processes.
- Provide awareness, training, and technical support to suppliers to improve ESG practices.
- Encourage supplier participation in sustainability programs and ASI-related initiatives.

7. Grievance & Complaint Mechanism

- Maintain a confidential grievance channel for suppliers, workers, and stakeholders to report concerns related to sourcing practices.
- Investigate all grievances promptly and implement appropriate corrective actions.
- Ensure non-retaliation for any person raising concerns in good faith.

8. Continual Improvement

- Periodically monitor the effectiveness of this Policy and its implementation.
- Review sourcing practices annually to integrate new sustainability standards, customer requirements, and ASI updates.
- Update processes and procedures where identified gaps or improvement opportunities arise.

9. Policy Review Requirements (ASI Criterion 2.4)

SRF Altech shall review this Policy:

1. At least every 5 years (mandatory).
2. Whenever a material change in the Business occurs (e.g., mergers, acquisitions, new operations, new supplier categories).
3. Upon identification of a material ESG risk, violation, or control gap in the supply chain.
4. If stakeholder feedback indicates a need for revision.

Each review shall document improvements, with implementation tracked through internal action plans.

10. Roles and Responsibilities

| Role | Responsibility |
|---------------------------|---|
| Procurement Head | Ensure implementation of responsible sourcing practices and compliance with this Policy |
| EHS Manager | Evaluate supplier environmental and sustainability performance |
| Compliance Officer | Monitor legal, governance, and ethical compliance |
| Top Management | Approve the Policy, allocate resources, and review performance |
| All Procurement Personnel | Integrate responsible sourcing into daily purchasing decisions |

11. Policy Communication

- This Policy shall be publicly disclosed on the SRF Altech website (ASI 2.4b requirement).
- Distributed to all suppliers during onboarding and contract renewals.
- Included as a binding requirement in supplier agreements, purchase orders, and tender documents.
- Communicated internally across all relevant departments.

12. Approval

This Responsible Sourcing Policy is approved by SRF Altech Top Management and is effective from the date of signature

Approved By,



Site Head, SRF Altech Limited.