

Stakeholder Complaints, Grievances and Requests for Information Policy

1. Purpose

The purpose of this policy is to establish a comprehensive, rights-compatible, transparent, and accessible Complaints Resolution Mechanism (CRM) for managing complaints, grievances, and requests for information submitted by stakeholders affected by SRF ALTECH's operations.

This policy fulfils the requirements of the Aluminium Stewardship Initiative (ASI) Performance Standard – Criterion 3.4 and aligns with international frameworks, including the UN Guiding Principles on Business and Human Rights (UNGPs) and the GRI 3-3 standard.

2. Scope

This policy applies to:

- All SRF ALTECH facilities and operational sites
- All employees, directors, officers
- Contractors, suppliers, labour agencies
- Communities, Indigenous Peoples, and all stakeholder groups affected by the organisation's operations

It covers all concerns related to environmental, social, human rights, community, health, safety, and governance issues.

3. ASI Principles Governing the Complaints Resolution Mechanism

The CRM is built on the nine core ASI criteria:

3.1 Legitimacy

- The CRM is trusted by stakeholders and administered using fair, impartial procedures.
- It operates with transparent governance, independent oversight where needed, and accountability for fair conduct.

3.2 Accessibility

- The CRM is accessible to all Affected Populations, including vulnerable or at-risk groups.
- Multiple channels are available (online, hotline, in-person, email, written submissions, anonymous).
- Complaints are accepted in local languages and oral formats.
- Assistance is provided for illiterate stakeholders, women, minorities, migrant workers, and persons with disabilities.

3.3 Predictability

- The CRM outlines clear steps, indicative timelines, and expected outcomes at each stage.
- Stakeholders are informed of progress at key phases.

- No statute of limitations restricts grievance submission.

3.4 Equitability

- Complainants are supported with access to information, translators, mediators, and advisory services.
- Support is provided to address power imbalances between the company and affected individuals.

3.5 Transparency

- The company publishes anonymized summaries, statistics, trends, and outcomes of grievances while protecting confidentiality.
- The mechanism is publicly available on the company website and through community outreach.

3.6 Rights-Compatibility

- Remedies and outcomes must respect internationally recognised human rights.
- The CRM ensures no solution causes further harm, discrimination, or retaliation.

3.7 Continuous Learning

- Regular analysis of grievance trends is conducted to identify systemic issues.
- Lessons learned are used to strengthen policies, training, and operational practices.

3.8 Engagement and Dialogue

- Dialogue-based, non-adjudicative processes are prioritised.
- Affected Populations participate in designing, reviewing, and improving the CRM.

3.9 Alignment with ASI and Global Standards

- The CRM is aligned with guidance from UN OHCHR, CAO, ICM, UNDP, The Remedy Project, and Harvard's rights-compatible grievance mechanism guidelines.

4. Complaints Resolution Mechanism Framework

4.1 Establishment of CRM

- SRF ALTECH has established a formal CRM capable of managing complaints related to all ASI Performance Standard issues.
- Designed in consultation with workers, communities, Indigenous Peoples (where applicable), NGOs, and other stakeholders.

4.2 Public Disclosure

- The CRM procedure, forms, contact points, and reporting are publicly disclosed on:
 - Company website
 - Community notice boards
 - Annual sustainability/GRI/ASI reports

4.3 How Stakeholders Can Submit Complaints

Complaints may be submitted through:

- ✓ Toll-free hotline
- ✓ Email
- ✓ Company website portal
- ✓ Complaints box at facility

- ✓ Community liaison officers
- ✓ Worker committees / union representatives
- ✓ Anonymous channels
- ✓ Oral submissions (recorded by designated officers)

No documentation or identification is required unless voluntarily provided.

5. CRM Process and Governance

5.1 Receiving and Registering Complaints

- A designated Grievance Officer or CRM team receives and logs all complaints in a secure, confidential system.
- An acknowledgment is provided to the complainant (except anonymous submissions).

5.2 Assessment and Classification

Complaints are categorized (human rights, environmental, safety, labour, community, supply chain, etc.) and prioritized based on severity and rights impact.

5.3 Investigation and Dialogue

- A fact-finding investigation is conducted.
- Dialogue with affected parties is facilitated.
- Mediators or external experts may be involved when appropriate.
- Gender-sensitive and culturally appropriate approaches are applied.

5.4 Resolution and Remedy

Possible outcomes include:

- Apology
- Corrective action
- Compensation or restitution
- Operational changes
- Training interventions
- Changes in policies or procedures
- Agreements reached via dialogue

5.5 Appeals and Escalation

- Stakeholders may appeal if unsatisfied.
- Escalation to senior management or independent third-party mediators is available.
- Indigenous groups may request the use of Customary Law grievance systems.

5.6 Safeguarding and Non-Retaliation

- Strict protections exist against retaliation for complainants, witnesses, or advisors.
- Anonymous submissions are encouraged where reprisals are feared.
- A specific Anti-Retaliation Protocol is maintained.

5.7 Data Protection and Confidentiality

- All CRM data complies with applicable privacy laws.
- Sensitive data is securely stored and access-restricted.

6. Special Provisions for Vulnerable and At-Risk Groups

The CRM ensures:

6.1 Gender Responsiveness

- Options for women-only committees
- Handling of sexual harassment cases by trained specialists
- Support for childcare, safe spaces, and cost barriers

6.2 Migrant Workers

- Complaints accepted without documentation
- Translation assistance
- Protection against labour trafficking concerns

6.3 Indigenous Peoples

- FPIC principles respected
- Access to customary grievance mechanisms
- Culturally sensitive engagement

6.4 Persons with Disabilities

- Complaints accepted via braille, audio, or assisted formats

7. Monitoring, Reporting, and Transparency

7.1 Public Reporting

SRF ALTECH will disclose annually (in anonymized and aggregated form):

- Number and types of grievances
- Categories of issues raised
- Resolution timelines
- Outcomes and remedies
- Appeal outcomes
- Complainant satisfaction feedback
- Systemic issues identified and corrective actions taken

All reporting aligns with GRI 3-3 and ASI reporting guidance.

8. Review and Continuous Improvement

8.1 Periodic Review

- Full CRM review every five years, at minimum (as required by ASI).
- Additional reviews triggered by:
 - major organizational changes (mergers, expansions)
 - significant incidents
 - evidence of control gaps
 - stakeholder feedback

8.2 Continuous Improvement

- CRM data analyzed regularly to identify trends.
- Policies, procedures, and training updated accordingly.
- Independent experts or multi-stakeholder panels may support improvements.

9. Training and Awareness

9.1 Employee Training

All employees, contractors, and managers receive mandatory training on:

- ASI requirements
- CRM procedures
- Human rights awareness
- Anti-retaliation protocols

9.2 Stakeholder Awareness

- Communities are informed through meetings, leaflets, digital platforms, and liaison officers.
- Workers are informed through orientation, toolbox talks, and posters.

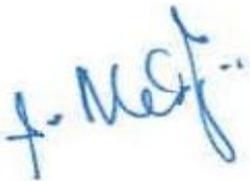
10. Policy Review and Approval

This policy will be reviewed at least every five (5) years or earlier if:

- Regulatory changes occur
- ASI Standards are updated
- Control gaps are identified
- Significant changes occur in business operations

Revision history will be maintained, and updates communicated to all stakeholders.

Approved By,



Site Head, SRF Altech Limited.