



# GLS Aluminium Industries Pvt. Ltd.

## HUMAN RIGHTS IMPACT ASSESSMENT (HRIA) PROCEDURE

*(Aligned with UN Guiding Principles & ASI Performance Standard)*

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### 1. Purpose

This procedure establishes a systematic framework for identifying, assessing, and mitigating human rights risks across GLS Aluminium's operations and supply chain, ensuring compliance with international standards (UNGP, ILO Conventions) and ASI requirements.

### 2. Scope

Applies to all GLS Aluminium facilities, contractors, suppliers, and business partners globally.

### 3. Definitions

- **HRIA:** A data-driven process to evaluate potential/adverse human rights impacts.
- **Stakeholders:** Employees, communities, indigenous groups, and supply chain workers affected by operations.



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## 4. Responsibilities

Role	Responsibilities
<b>Sustainability Head</b>	Overall HRIA implementation; reporting to the Board.
<b>EHS Manager</b>	Assess environmental health linkages (e.g., emissions, water scarcity).
<b>Legal Counsel</b>	Ensure compliance with local/international laws; FPIC protocols.
<b>Supply Chain Head</b>	Evaluate supplier human rights practices; conduct audits.
<b>HR Head</b>	Employee rights assessments; grievance mechanisms; training.

## 5. Procedure

### 5.1 Preparation

- **Framework Development:** Customize assessment criteria for aluminium sector risks:
  - *Labor Rights:* Forced labour, child labour in bauxite sourcing.
  - *Community Impacts:* Land acquisition, indigenous rights near mining sites.
- **Stakeholder Mapping:** Identify affected groups (e.g., tribal communities near refineries).



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## 5.2 Assessment Execution

- **Data Collection:**
  - *Methods:* Worker interviews, community consultations, supplier audits.
  - *Focus Areas:* Workplace safety in smelters, fair wages, water access.
- **Risk Analysis:** Rate impacts as **High/Medium/Low** based on:
  - Severity, scale, remediation difficulty.

## 5.3 Reporting

- **Documentation:** Report includes:
  - Identified risks, data sources, stakeholder feedback.
- **Approval:** Reviewed by Legal Counsel; approved by CEO.

## 5.4 Action Plan

- **Mitigation Measures:**

Risk	Action
Indigenous Land Rights	Implement FPIC; co-develop benefit-sharing agreements.
Worker Safety	Automated handling systems; heat-stress management.
Water Scarcity	Community water access projects; zero-discharge technology.

## 5.5 Monitoring & Review

- **KPIs:** Quarterly tracking of:
  - Grievances resolved, supplier compliance rates.
- **Audits:** Biennial third-party HRIA audits.



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## 5.6 Communication

- **Internal:** Training sessions on HRIA findings.
- **External:** Public summaries on website; community forums.

## 6. Sector-Specific HRIA Focus Areas

Impact Area	Aluminum-Specific Risks	Mitigation Measures	ASI Ref.
Labor Rights	Child labor in	ASI-certified suppliers.	ASI 9.2
Community Health	Fluoride emissions from smelters	Real-time air monitoring; health clinics.	ASI 4.8
Indigenous Rights	Land displacement for mining	FPIC documentation; cultural heritage preservation funds.	ASI 5.3
Worker Safety	Molten metal exposure	AI-powered hazard detection; emergency cooling systems.	ASI 4.5



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## 7. Documentation & Training

- **Records:** Securely store HRIA reports for 10 years.
- **Training:** Annual workshops for:
  - Site managers on community engagement.
  - Procurement teams on ethical sourcing.

## Revision History

Rev. No.	Date	Changes Made	Approved By
00	01/08/2025	Initial Issue	Rajesh Singh (C.E.O.)

