



# GLS Aluminium Industries Pvt. Ltd.

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<b>TITLE:</b> Non-Compliance and Liabilities	DOC. NO.	<b>GLS/FOIL/MR/SOP/14</b>
	REV. NO.	00
	EFFECTIVE DATE	01/08/2025
	REVIEW DATE	31/07/2026
	SUPERSEDES	NIL

## Non-Compliance and Liabilities Policy for GLS Aluminium Industries Pvt. Ltd.

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### 1. Purpose

The purpose of this Non-Compliance and Liabilities Policy is to establish a framework for publicly disclosing information on material fines, judgments, penalties, and non-monetary sanctions related to non-compliance with applicable laws. This policy aligns with the Global Reporting Initiative (GRI) standards and the Aluminium Stewardship Initiative (ASI) Performance Standard, ensuring transparency, accountability, and continuous improvement in our compliance practices.

### 2. Scope

This policy applies to all employees, directors, officers, contractors, suppliers, and any other stakeholders involved with GLS Aluminium Industries Pvt. Ltd. It covers all facilities and operations, including those related to environmental, social, economic, and governance compliance.

### 3. Core Principles

**Transparency:** We are committed to providing clear and accurate information about any material non-compliance with applicable laws and regulations, including any resulting fines, penalties, or sanctions.

**Accountability:** We recognize our responsibility to report on non-compliance issues and to implement corrective actions to prevent recurrence.

**Continuous Improvement:** We strive to continuously improve our compliance practices to minimize the risk of non-compliance and associated liabilities.

### 4. Non-Compliance Reporting Framework

#### 4.1 Public Disclosure of Non-Compliance



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**Annual Disclosure:** GLS Aluminium Industries Pvt. Ltd. publicly discloses information on material fines, judgments, penalties, and non-monetary sanctions for non-compliance with applicable laws on an annual basis. This includes cases brought through grievance mechanisms and any corrective actions taken.

**GRI Alignment:** Our non-compliance reporting aligns with the following GRI Standards:

**GRI 205: Anti-Corruption 2016** - Disclosure 205-3: Confirmed incidents of corruption and actions taken.

**GRI 206: Anti-Competitive Behavior 2016** - Disclosure 206-1: Legal actions for anti-competitive behavior, anti-trust, and monopoly practices.

**GRI 307: Environmental Compliance 2016** - Disclosure 307-1: Non-compliance with environmental laws and regulations.

**GRI 411: Rights of Indigenous Peoples 2016** - Disclosure 411-1: Incidents of violations involving rights of indigenous people.

**GRI 419: Socioeconomic Compliance 2016** - Disclosure 419-1: Non-compliance with laws and regulations in the social and economic area.

## 4.2 Reporting on Compliance Fines and Sanctions

**Monetary Fines:** We disclose the total monetary value of compliance fines imposed on the company for non-compliance with applicable laws.

**Non-Monetary Sanctions:** We report the total number of non-monetary sanctions, such as restrictions, bans, or suspensions, imposed due to non-compliance.

**Corrective Actions:** Information on corrective actions taken in response to non-compliance incidents is disclosed to demonstrate our commitment to addressing and rectifying compliance issues.

## 4.3 Cases Resolved Under Customary Law



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**Disclosure of Settlements:** In cases where disputes are resolved according to customary law, we may consider disclosing the terms of settlement, with the consent of the parties involved, as part of our commitment to transparency.

## 5. Implementation and Continuous Improvement

**Materiality of Non-Compliance:** We assess the materiality of non-compliance incidents based on their impact on the company, stakeholders, and the environment. Material incidents are included in our annual disclosures.

**Corrective Action and Prevention:** We implement corrective actions to address non-compliance incidents and prevent recurrence. These actions are monitored and reviewed regularly to ensure their effectiveness.

**Feedback Mechanisms:** We encourage stakeholders to provide feedback on our compliance practices and use this input to improve our processes and reduce the risk of non-compliance.

## 6. Training and Awareness

**Employee Training:** All employees, directors, and officers are provided with training on compliance obligations and the importance of adhering to applicable laws and regulations.

**Ongoing Communication:** We regularly communicate with employees and stakeholders about our non-compliance reporting commitments and the measures in place to prevent non-compliance.

## 7. Review and Revision

**Policy Review:** This Non-Compliance and Liabilities Policy will be reviewed at least every five years or as needed based on changes in legal requirements or stakeholder expectations. The review process will include input from senior management and relevant stakeholders.

**Revision History:** Any changes or updates to this policy will be documented in the revision history, and all stakeholders will be informed of the changes.

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**Prepared By:** Shiv Pratap, Compliance Officer

**Reviewed By:** Rajendra Moyal, Management Representative

**Approved By:** Rajesh Singh, C.O.O.

**Revision History:**

Revision Number	Date	Description of Changes	Approved By
00	01-08-2025	Initial release of the Non-Compliance and Liabilities Policy.	Rajesh Singh (C.O.O.) 

