



# GLS Aluminum Industries Pvt. Ltd.

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<b>TITLE:</b> Payments to Governments Policy	DOC. NO.	<b>GLS/FOIL/EHS/SOP/02</b>
	REV. NO.	00
	EFFECTIVE DATE	01/08/2025
	REVIEW DATE	31/07/2026
	SUPERSEDES	NIL

## Payments to Governments Policy for GLS Aluminum Industries Pvt. Ltd.

**Document Number:** GLS-EHS-MR-02

**Effective Date:** 01/08/2025

**Revision Number:** 00

### 1. Purpose

The purpose of this Payments to Governments Policy is to establish a clear framework for the legal, ethical, and transparent management and disclosure of payments made to governments by GLS Aluminium Industries Pvt. Ltd. This policy aligns with the Global Reporting Initiative (GRI) standards and the Aluminium Stewardship Initiative (ASI) Performance Standard, ensuring that all payments, including taxes, royalties, and political contributions, are made and reported in a lawful and transparent manner.

### 2. Scope

This policy applies to all employees, directors, officers, contractors, and any other stakeholders involved with GLS Aluminium Industries Pvt. Ltd. It covers all payments made to governments at all levels, including payments to political parties, whether in cash or in-kind, directly or through intermediaries.

### 3. Core Principles

**Legal Compliance:** We commit to making payments to governments only on a legal and/or contractual basis, ensuring full compliance with applicable laws and regulations.

**Transparency:** We ensure that all payments to governments, including political contributions, are publicly disclosed in a transparent manner.

**Accountability:** We are accountable for all financial interactions with governments and political entities, ensuring that they are conducted ethically and responsibly.



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## 4. Payments to Governments Framework

### 4.1 Legal and Contractual Basis for Payments

**Authorized Payments:** GLS Aluminum Industries Pvt. Ltd. ensures that all payments made to governments, including taxes, royalties, and other fees, are made strictly on a legal and/or contractual basis. No payments are made without proper authorization and documentation.

### 4.2 Public Disclosure of Payments

**Annual Disclosure:** We publicly disclose all material payments made to governments, including taxes, royalties, signature bonuses, and other forms of payments or benefits, on an annual basis. This disclosure is aligned with the Global Reporting Initiative (GRI) and ASI Performance Standard requirements.

**Political Contributions:** We disclose the value and beneficiaries of any financial and in-kind political contributions, whether made directly or through intermediaries, on an annual basis. This includes any contributions made to political parties, candidates, or related entities.

## 5. Alignment with International Frameworks

**GRI Standards:** Our reporting on payments to governments aligns with GRI 415: Public Policy 2016 - Disclosure 415-1: Political Contributions, ensuring transparency and consistency in our disclosures.

**Extractive Industries Transparency Initiative (EITI):** We endorse the principles of the EITI and disclose all material payments made to participating governments in the form of taxes, royalties, and other applicable payments. This includes using applicable reporting templates and country workplans where required.

**Non-EITI Countries:** In non-EITI countries, where contract confidentiality provisions allow, we disclose payments to governments in a manner consistent with our commitment to transparency.

## 6. Implementation and Continuous Improvement

**Audit and Assurance Systems:** Our payment disclosures are supported by existing audit and assurance systems, ensuring that all reported information is accurate, complete, and reliable.



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**Regular Monitoring:** We regularly monitor our payment processes to ensure compliance with this policy and to identify any areas for improvement. This includes internal audits and management reviews.

**Stakeholder Engagement:** We engage with stakeholders, including governments and civil society, to ensure that our payment disclosures meet their expectations and contribute to broader transparency efforts.

## 7. Training and Awareness

**Employee Training:** All employees involved in financial transactions with governments are provided with training on this policy, applicable laws, and reporting standards to ensure full compliance.

**Ongoing Communication:** We regularly communicate with employees and stakeholders about our commitments under this policy, emphasizing the importance of transparency and accountability in all government-related payments.

## 8. Review and Revision

**Policy Review:** This Payments to Governments 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 - Sustainability Head / Management Representative

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

**Revision History:**00



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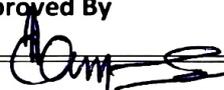
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SUPERSEDES NIL

Revision Number	Date	Description of Changes	Approved By
00	01-08-2025	Initial release of the Payments to Governments Policy.	 Rajesh Singh (C.O.O.)

