

Responsible Sourcing Policy

Company: GLS Aluminium Industries Pvt. Ltd.

Effective Date: 01-08-2025

Revision No.: 01

1. Purpose

The purpose of this policy is to ensure that all sourcing activities at GLS Aluminium are conducted in a responsible, ethical, and sustainable manner, in alignment with:

- **GRI Standards** (GRI 2, GRI 3, GRI 204, GRI 308, GRI 414)
- **Aluminium Stewardship Initiative (ASI) Performance Standard** requirements.

This policy establishes the framework for responsibly sourcing aluminium and other materials to minimise environmental and social impacts, ensure product traceability, and maintain ethical business conduct.

2. Scope

This policy applies to:

- All procurement of raw materials, semi-finished aluminium, packaging, consumables, chemicals, and services.
 - All sourcing from domestic and international suppliers, including subcontractors and service providers.
 - All tiers of the supply chain that contribute to GLS Aluminium's products.
-

3. Policy Commitments

3.1 Legal and Ethical Compliance

- Source only from suppliers who comply with applicable **laws, regulations, and international conventions**.
- Prohibit child labour, forced labour, human trafficking, and discrimination (aligned with **ILO Core Conventions, GRI 2-30, and ASI Criterion 11.1**).

3.2 Responsible Aluminium Sourcing

- Prioritise suppliers with **ASI Chain of Custody Certification** or equivalent responsible sourcing credentials.

- Avoid sourcing aluminium from **conflict-affected or high-risk areas** unless compliant with OECD Due Diligence Guidance.
- Ensure segregation of responsibly sourced materials for traceability.

3.3 Human Rights Protection

- Uphold the **UN Guiding Principles on Business and Human Rights**.
- Respect freedom of association, fair wages, safe working conditions, and no harassment or abuse.

3.4 Environmental Stewardship

- Source materials from suppliers committed to reducing **GHG emissions, energy, and water consumption**.
- Avoid sourcing from activities causing deforestation, biodiversity loss, or significant habitat destruction.
- Encourage suppliers to adopt circular economy principles and recycling initiatives.

3.5 Anti-Corruption and Fair Practices

- Zero tolerance for bribery, corruption, facilitation payments, and anti-competitive behaviour.
- Prohibit gifts or benefits that may influence sourcing decisions.

3.6 Quality, Safety, and Traceability

- Require suppliers to maintain full material traceability from origin to delivery.
- Source only materials meeting agreed specifications, legal requirements, and customer standards.

4. Due Diligence and Risk Management

- Conduct **annual supplier and sourcing risk assessments** covering environmental, social, and governance (ESG) factors.
- Classify sourcing channels as **low, medium, or high risk**.
- Require **Corrective Action Plans (CAPs)** for high-risk sources and follow-up audits for compliance.

5. Verification and Monitoring

- Perform supplier audits and site visits for critical and high-risk suppliers.
- Require annual **ESG self-assessments** from suppliers.
- Use third-party verification where required (GRI 308-1, GRI 414-1).

Targets:

- By 2026: 90% of aluminium sourced to be from suppliers meeting GLS Aluminium’s ESG criteria.
 - By 2027: 75% of aluminium sourced to be from **ASI-certified** or equivalent responsible sources.
-

6. Supplier Engagement and Capacity Building

- Provide training, guidelines, and resources to suppliers on responsible sourcing and ASI requirements.
 - Collaborate with suppliers on joint projects to improve environmental and social performance.
-

7. Grievance and Complaints Mechanism

- Maintain a confidential channel for suppliers, workers, and stakeholders to report sourcing-related concerns.
 - Investigate all reports promptly and take corrective action.
-

8. Continual Improvement

- Review sourcing practices annually to identify opportunities for improvement.
 - Integrate new sustainability standards and customer requirements into procurement procedures.
-

9. Roles and Responsibilities

Role	Responsibility
Procurement Head	Oversee sourcing process and ensure compliance with policy
EHS Manager	Assess environmental and sustainability compliance in sourcing
Compliance Officer	Monitor legal and ethical compliance in procurement
Top Management	Approve policy, allocate resources, and review performance

10. Policy Communication

- Publicly available on GLS Aluminium’s website.

- Distributed to all suppliers during onboarding and contract renewals.
- Included as a binding requirement in supplier contracts.

11. Revision History



Revision No.	Date	Description of Change	Approved By
01	01-08-2025	Initial issue	Rajesh Singh (C.O.O.)

