



## RAVIRAJ FOILS LIMITED. EHS PROCEDURE

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|-----------------------------------------------------------|----------------|---------------|
| HR DEPARTMENT                                             | PAGE NO        | Page 1 of 7   |
| TITLE: Environmental, Social, and Governance (ESG) Policy | DOC. NO.       | RFL/EHS/PR/49 |
|                                                           | REV. NO.       | 00            |
|                                                           | EFFECTIVE DATE | 20/08/2024    |
|                                                           | REVIEW DATE    | 19/08/2025    |
|                                                           | SUPERSEDES     | NIL           |

### 1. Purpose

The purpose of this ESG Policy is to establish and implement integrated environmental, social, and governance (ESG) practices within Raviraj Foils Ltd. in line with the Aluminium Stewardship Initiative (ASI) Performance Standard and the Global Reporting Initiative (GRI) standards. This policy outlines our commitment to sustainable and ethical business practices, ensuring that our operations minimize environmental impacts, promote social well-being, and uphold strong governance principles.

### 2. Scope

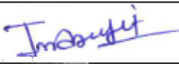
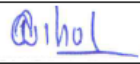
This policy applies to all employees, directors, officers, contractors, suppliers, and any other stakeholders involved with Raviraj Foils Ltd. It encompasses all aspects of our business operations, including environmental management, social responsibility, and corporate governance.

### 3. Core Principles

**Environmental Stewardship:** We are committed to minimizing our environmental impact through sustainable practices, efficient resource use, and continuous improvement in our environmental management systems.

**Social Responsibility:** We strive to create a positive social impact by upholding human rights, ensuring safe and fair working conditions, promoting diversity and inclusion, and engaging with the communities in which we operate.

**Governance Integrity:** We adhere to the highest standards of governance, ensuring transparency, accountability, and ethical conduct in all our business dealings.

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| Safety Officer                                                                      | Sr. EHS Officer                                                                     | HR - Head                                                                             |
| DATE: 20/08/2024                                                                    | DATE: 20/8/2024                                                                     | DATE: 20/08/2024                                                                      |

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### 4. ESG Policy Implementation

#### 4.1 Environmental, Social, and Governance Practices

**Integrated Policies:** Raviraj Foils Ltd. implements integrated ESG policies consistent with ASI and GRI standards. These policies are designed to address key environmental, social, and governance issues relevant to our business.

**Senior Management Endorsement:** Our ESG policies are endorsed by senior management, who provide the necessary resources for their effective implementation and continuous improvement.

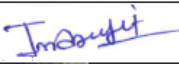
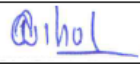
**Policy Review:** ESG policies are reviewed at least every five years or as needed based on changes to the business or emerging risks. Reviews are also conducted if there is any indication of a control gap.

**Internal and External Communication:** ESG policies are communicated to all employees and stakeholders through appropriate channels, ensuring they are understood and integrated into daily operations.

#### 4.2 Leadership and Management Commitment

**Senior Management Representative:** A senior management representative is appointed to lead the implementation of ESG policies and another to oversee the communication of these policies internally and externally.

**Resources and Training:** The company commits to providing the necessary resources, including training and capacity building, to support the implementation and maintenance of our ESG management systems.

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### 4.3 Environmental and Social Management Systems

**Environmental Management System (EMS):** An EMS is implemented to monitor and manage environmental impacts, ensuring compliance with regulatory requirements and striving for continuous improvement in environmental performance.

**Social Management System (SMS):** An SMS is implemented to address social issues, including human rights, labor rights, and occupational health and safety, and to engage with affected populations and communities.

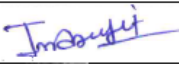
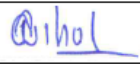
### 5. Responsible Sourcing

**Responsible Sourcing Policy:** The company implements a responsible sourcing policy that covers environmental, social, and governance issues, ensuring that procurement practices align with the principles in the ASI Performance Standard.

**Public Disclosure:** The latest version of the responsible sourcing policy is publicly disclosed, and the policy is reviewed regularly to address any changes in business operations or risks.

### 6. Environmental and Social Impact Assessments

**Impact Assessments:** Environmental and social impact assessments are conducted for new projects or major changes to existing facilities. These assessments consider baseline conditions and the potential impacts of our operations.

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**Impact Management Plan:** Based on the assessments, an impact management plan is implemented to prevent, mitigate, and remediate any identified material impacts. This plan is reviewed and updated regularly.

### 7. Human Rights Impact Assessments

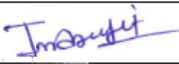
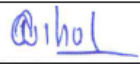
**Human Rights Assessments:** A Human Rights Impact Assessment, including a gender analysis, is conducted for new projects or significant changes to existing facilities. This includes assessments of Indigenous Peoples' rights where applicable.

**Human Rights Management Plan:** A gender-sensitive human rights management plan is developed to address any identified risks and is reviewed periodically to ensure effectiveness.

### 8. Emergency Response and Business Resilience

**Emergency Response Plans:** Site-specific emergency response plans are developed in collaboration with workers, affected populations, and relevant agencies. These plans are reviewed regularly and tested in the absence of actual emergencies.

**Business Resilience Plan:** A business resilience plan is developed to address situations where operations may need to be suspended or significantly altered due to factors outside the company's control. This plan takes into account material adverse environmental, social, and governance impacts and is reviewed at least every five years or upon changes to business operations.

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### 8.1 Examples of Business Resilience Scenarios

Significantly reduced staffing levels (e.g., reducing from three shifts to one or two).

Delayed initiation or continuation of projects.

Partial or complete closure of operations.

Transitioning facilities to care and maintenance mode (minimal staffing to maintain operations).

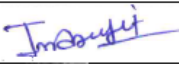
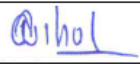
### 8.2 Engagement with Affected Populations

The business resilience plan includes provisions for engaging with affected populations and organizations to ensure that any significant issues are not exacerbated by suspended or altered operations. This engagement is particularly critical where operations may impact human rights or environmental obligations, such as waste management and biodiversity.

## 9. Mergers, Acquisitions, and Divestment

### 9.1 Due Diligence for Mergers and Acquisitions

**ESG Review:** In any due diligence process for mergers and acquisitions, the company reviews its environmental, social, and governance practices related to the ASI Performance Standard, including those associated with historic aluminum operations.

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### 9.2 Post-Merger or Acquisition Activities

**Impact Mitigation Plan:** After a merger or acquisition, the company shares information regarding material ESG impacts with affected populations and organizations. A mitigation plan is developed and implemented in consultation with these stakeholders, and progress is shared annually.

### 10. Closure, Decommissioning, and Divestment

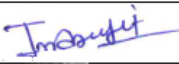
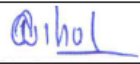
**Planning Process:** Environmental, social, and governance practices are reviewed during the planning process for closure, decommissioning, and divestment of operations. This includes the development of a monitoring plan for material impacts.

**Stakeholder Consultation:** Affected populations and organizations are consulted, and their participation is sought in developing and implementing the closure and decommissioning plans.

**Financial Assurance:** Adequate financial resources are set aside to ensure that closure and rehabilitation commitments are met, minimizing long-term environmental and social risks.

### 11. Monitoring, Reporting, and Continuous Improvement

**Regular Monitoring:** ESG performance is monitored regularly through internal audits, management reviews, and stakeholder engagement. This ensures compliance with ESG policies and identifies areas for improvement.

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SUPERSEDES

NIL

**Public Reporting:** ESG performance is reported publicly in accordance with GRI standards and ASI guidelines. This includes annual sustainability reports and disclosures related to environmental, social, and governance impacts.

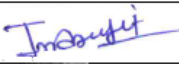
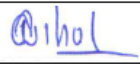
**Continuous Improvement:** The company is committed to continuous improvement in ESG performance by regularly reviewing policies, practices, and outcomes, and by integrating feedback from stakeholders.

## 12. Review and Revision

**Policy Review:** This ESG Policy will be reviewed at least every five years or as needed based on business changes or identified risks. The review process includes 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.

| Sr. No. | Issue Date | Reason for revision | Revision No. | Obsolete Doc No. |
|---------|------------|---------------------|--------------|------------------|
| 1       | 20/08/2024 | First Issue         | 00           | -                |
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| <b>PREPARED BY:</b>                                                                 | <b>CHECKED BY:</b>                                                                  | <b>APPROVED BY:</b>                                                                   |
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| <b>Safety Officer</b>                                                               | <b>Sr. EHS Officer</b>                                                              | <b>HR - Head</b>                                                                      |
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