



RAVIRAJ FOILS LIMITED.

EHS PROCEDURE

HR DEPARTMENT

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DOC. NO.

RFL/EHS/PR/81

REV. NO.

00

EFFECTIVE DATE

20/08/2024

REVIEW DATE

19/08/2025

SUPERSEDES

NIL

TITLE: Displacement Policy

1. Purpose

Raviraj Foils Ltd. is committed to minimizing the impacts of physical and economic displacement caused by our operations. This policy outlines our approach to identifying, avoiding, and mitigating displacement impacts, with a focus on vulnerable and at-risk populations, including women, and ensuring that displacement is conducted in a manner that respects human rights and the dignity of affected persons.

2. Policy Statements

2.1 Avoidance and Minimization of Displacement

a. Consider all feasible alternatives in project designs to avoid or minimize physical and/or economic displacement. This consideration must balance environmental, social, and financial costs and benefits, with particular attention to impacts on vulnerable or at-risk populations, including women.

2.2 Resettlement Action Plan (RAP) Development

b. When displacement is unavoidable, in consultation with and, where possible, with the participation of affected populations and organizations, develop a Resettlement Action Plan (RAP) that includes:

I. Compliance with the applicable requirements of IFC Performance Standard 5 (Land Acquisition and Involuntary Resettlement).

II. Adherence to applicable laws, regardless of the number of people affected.

III. Ensuring that living conditions and income-generating options for affected persons are equal to or exceed those prior to displacement.

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CHECKED BY:

APPROVED BY:

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Safety Officer

Sr. EHS Officer

HR - Head

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2.3 RAP Review and Disclosure

- c. Review the RAP at least every five years.
- d. Review the RAP after any significant changes to the business that materially alter the conditions under which the plan was created.
- e. Review the RAP upon any indication of a control gap.
- f. Publicly disclose the latest version of the RAP, including the number of people impacted.

2.4 Reporting and Indigenous Peoples' Consent

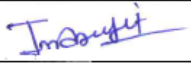
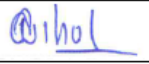
- g. Share progress against the RAP with affected populations and organizations annually for the duration of its implementation or in the event of deviations.
- h. Obtain the Free, Prior, and Informed Consent (FPIC) of Indigenous Peoples where they are involved in the displacement.
- i. Publicly disclose whether FPIC has been obtained, where relevant.

3. Application

3.1 Project Scope

This policy applies to all new projects and major changes initiated from 01 January 2022 onwards.

For projects initiated pre-2022, the policy applies to those projects initiated after Raviraj Foils Ltd. joined the Aluminium Stewardship Initiative (ASI).

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4. Background

4.1 Understanding Displacement

Displacement can be physical (relocation or loss of shelter) or economic (loss of assets or access to assets leading to loss of income or livelihood). Involuntary displacement occurs when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use.

5. Points to Consider in Implementing Criterion 9.6

5.1 Minimizing Displacement

Explore all feasible alternatives to avoid or minimize displacement. Consider gender-sensitive approaches and prioritize negotiated settlements over expropriation to avoid forced evictions.

5.2 Developing a Resettlement Action Plan

When physical displacement is unavoidable, develop and implement a RAP consistent with IFC Performance Standard 5. This should include:

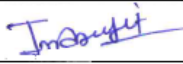
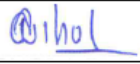
Identification of all people to be displaced.

Efforts to minimize displacement.

Informed consultation and participation of affected people.

Compensation at full replacement cost for lost assets.

Ensuring that compensation documentation is in the names of both spouses or single women heads of households.

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Adequate replacement housing and livelihood restoration plans.

Institutional responsibility for RAP implementation and grievance redress mechanisms.

Monitoring and evaluation arrangements, including the involvement of affected communities.

5.3 Addressing Economic Displacement

For projects involving economic displacement, develop a Livelihood Restoration Plan to ensure that affected persons re-establish their livelihoods at or above pre-displacement levels. This includes compensation for loss of assets and access to alternative resources with equivalent livelihood-earning potential.

5.4 Regular RAP Reviews

Conduct regular reviews of the RAP, involving affected populations where possible. Reviews should occur minimally every five years or following significant business changes or identified control gaps.

6. Resources and Training

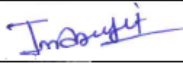
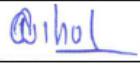
6.1 Guidance and References

For more guidance on managing displacement, consult references including:

IFC Performance Standard 5 – Land Acquisition and Involuntary Resettlement – Guidance Note (2012).

The IFC Handbook for Preparing a Resettlement Action Plan (2001).

Basic Principles and Guidelines on Development-Based Evictions and Displacement (UN Special Rapporteur).

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7. Revision History:

Sr. No.	Issue Date	Reason for revision	Revision No.	Obsolete Doc No.
1	20/08/2024	First Issue	00	-

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